

**LIONS HOME FOR THE ELDERS**  
**PERSONAL DATA PROTECTION POLICY**

(As at 14 April 2021)

**1. OBJECTIVE**

Lions Home for the Elders (“Lions Home” or “the Home”) protects the confidentiality of its stakeholders, partners, employees, clients, residents and their caregivers. Personal data is treated in strictest confidence.

This Data Protection (DP) Policy ensures the management of data in Lions Home is in compliance with the Personal Data Protection Act 2012.

Purpose of Personal Data Protection Act 2012 (“PDPA”):

To govern the collection, use and disclosure of personal data by organisations in a manner that recognises both the right of the individuals to protect their personal data and the need of organisations to collect, use or disclose personal data for purposes that a reasonable person would consider appropriate in the circumstances.

1.1 Personal Data is ascribed in the PDPA to mean “any data about an individual who can be identified from that data and other information to which the organisation has or is likely to have access.”

Personal Data shall include but not limited to the following:

- (a) Personal particulars such as NRIC/FIN number, contact details, finance related information including credit card and banking account;
- (b) Medical records;
- (c) Social and family background; and
- (d) Information in either physical or electronic form. It includes images captured by CCTV cameras within Lions Home premises.

**2. SCOPE**

The DP policy outlines how Lions Home collects, uses, discloses and manages the personal data of the individual.

**3. DATA PROTECTION OFFICER**

The Data Protection Officer (DPO) is responsible to oversee the management of data and ensure its compliance to PDPA. He is supported by the Heads of Departments (HODs) whose role is to execute the DP strategy at the operations.

The DPO is the point of contact for data protection incidents and/or any query on Lions Home Personal Data Protection Policy and Procedures.

**4. THE CONSENT, PURPOSE LIMITATION AND NOTIFICATION OBLIGATIONS**

4.1 The Home shall notify the individual of the purpose for the collection, use and disclosure of personal data and obtain his consent unless the following exceptions apply (non-exhaustive):

**LIONS HOME FOR THE ELDERS**  
**PERSONAL DATA PROTECTION POLICY**

(As at 14 April 2021)

- (a) the Collection or Use or Disclosure is necessary and clearly in the interest of the individual, consent cannot be obtained in a timely way or the individual would not reasonably be expected to withhold consent;
- (b) the Collection or Use or Disclosure is necessary in an emergency that threatens the life, health or safety of the individual or another individual; and/or
- (c) the Collection or Use or Disclosure is necessary in the national interest.

The comprehensive list of the exceptions may be found in the Second (collection of personal data without consent), Third (use of personal data without consent) and Fourth (disclosure of personal data without consent) Schedules under PDPA.

- 4.2 The Home shall assume the individual has given his deemed consent to the collection, use or disclosure of the personal data if he voluntarily provides his personal data to Lions Home or when the individual represents and discloses personal data about a relevant third party (dependent, spouse, children and/or parents).
- 4.3 If the individual lacks mental capacity, the Home shall establish the collection, use or disclosure of personal data that is in the best interest of the individual.
- 4.4 The purpose or purposes for the collection of personal data shall include but not limited to the following:
  - (a) Admission to Lions Home or enrolment into the Home's clinical and community-based care services;
  - (b) Assessment of financials as part of the mandatory requirements;
  - (c) Evaluation of biopsychosocial and emotional needs;
  - (d) Application of grant and financial assistance from government agencies and/or philanthropic organisations;
  - (e) Collaboration with health and social care organisations in delivering seamless, holistic and integrated care services;
  - (f) Management of donations;
  - (g) Management of volunteers;
  - (h) Employment;
  - (i) Communications with stakeholders and partners on the happenings in the Home as well as soliciting for donations through appeal letters and other mediums; and
  - (j) Regulatory and legal requirements.

**5. ACCESS AND CORRECTION OBLIGATIONS**

- 5.1 Individuals can put forward their request in writing either through post or email to the DPO in order to access, correct or withdraw consent for the collection, use and disclosure of personal data.
- 5.2 The Home shall respond accordingly based on the type and reasonableness of the request:

**LIONS HOME FOR THE ELDERS**  
**PERSONAL DATA PROTECTION POLICY**

(As at 14 April 2021)

- (a) Access -  
Lions Home shall provide an individual with his personal data that is under the control of the Home and about the ways in which the personal data has been or may have been used or disclosed during the past 12 months. Accordingly, the individual shall receive a reply in appropriate time. However, the Home will not allow access if it:
- threatens the safety or physical or mental health of another individual;
  - causes immediate or grave harm to the safety or physical or mental health of the individual who made the request;
  - reveals personal data about another individual;
  - reveals the identity of an individual who provided personal data about another individual; or
  - contrary to national interest.
- (b) Correction –  
The Home shall amend an error or omission in a reported personal data in its possession. In addition, it shall notify organisations to which personal data was disclosed unless otherwise directed by the individual.
- (c) Withdrawal of Consent –  
The Home shall advise the individual that its ability to provide assistance, financial and/or any form of support, may be impeded as a result of the withdrawal of any consent given or deemed to have been given in respect to the collection, use and disclosure of personal data. Confidential information required by law and the relevant authorities will be duly complied

For stakeholders, partners, donors and volunteers, they may exercise the option of withdrawal by notifying the Home of their intentions.

**6. Accuracy Obligation**

Lions Home shall ensure that the personal data collected is accurate and complete. It shall, where appropriate, take steps to authenticate the personal information collected.

**7. Protection Obligation**

Lions Home shall protect personal data by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

**8. Retention Limitation Obligation**

Lions Home shall retain the documents containing personal data in accordance with the regulatory and operational obligations.

**LIONS HOME FOR THE ELDERS**  
**PERSONAL DATA PROTECTION POLICY**

(As at 14 April 2021)

- 8.1 Project files and Printed Records  
Printed records containing personal data are archived for a period of years. Thereafter, where the information is obsolete or not required, printed records shall be destroyed:
- Finance - 6 years
  - Human Resource - 5 years
  - Corporate Communications - 5 years
  - Public/Social Welfare - 15 years
  - Clinical - 15 years
- 8.2 The Home shall conduct a review of personal data every 2 yearly to determine if the personal information stored is still needed to serve its intended purposes.