

Personal Data Protection Policy

1. Introduction

FootballPlus Limited (“We” or “Our Organisation”) is an Institution of a Public Character dedicated to helping young people and building stronger communities through football. We respect the privacy of our beneficiaries (including our Champions), as well as our donors, volunteers, supporters, event participants and members of the public. We are committed to fulfilling our obligations to you and under the Personal Data Protection Act 2012 (“**PDPA**”). This Personal Data Protection Policy (“**Policy**”) governs the collection, use and disclosure of Personal Data by our organisation and will assist you in understanding how we manage any Personal Data which is provided to us. By using our website and/or by giving or making available your Personal Data to us, you agree and consent to the collection, use, disclosure and processing of your Personal Data in accordance with the terms of this Policy.

1.1. Definitions

“**Personal Data**” refers to any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which the organisation has or is likely to have access. Examples of such Personal Data include:

(a) your name, NRIC or FIN number, telephone number(s), mailing address, email address and any other information relating to you which you have provided us in any forms you may have submitted to us, including through the giving.sg portal;

(b) information about your use of our website and services including your IP address which we may record through the use of internet cookies

“**Processing**” means in relation to Personal Data, the carrying out of any operation or set of operations in relation to Personal Data, and includes any of the following: recording, holding, organising, adapting, altering, retrieving, combining, transmitting, erasing or destroying personal data.

2. Collection of Personal Data

2.1. Generally, your Personal Data may be collected by Our Organisation either directly or by third parties who work with us in the following situations:

(a) when you submit forms to us to register to be a referrer, beneficiary, donor, supporter and/or event participant of Our Organisation;

- (b) when you apply to be a volunteer, intern or employee with Our Organisation, and throughout the course of such work, including submitting any documents or information in connection with such application;
- (c) when you register your interest with us to obtain news, information and updates on Our Organisation and its activities, or employment with Our Organisation;
- (d) when you access our website, submit information through our website and/or your browser loads our internet cookies;
- (e) when you access our giving.sg profile at <https://www.giving.sg/footballplus-ltd> and/or donate through such profile;
- (f) when you respond to surveys or questionnaires from us or third parties we engage;
- (g) through Closed-Circuit Television System (CCTV) recordings when you visit our premises;
- (h) when you communicate with us or any of our third party partners in relation to Our Organisation's activities;
- (i) through photography, videography and/or sound recordings when you participate in any of our events and/or activities;
- (j) when you participate in our programmes and/or activities, including our Champions Unlimited programme, and you provide us with personal data for purposes of tracking your progress under our player performance matrix;
- (k) when you submit your personal data to us for any other reason; and/or
- (l) when we collect your personal data by other lawful means.

2.2. If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of such third party to provide us with their Personal Data for the respective purposes.

2.3. You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the services you have requested.

3. Purposes for Collection, Use, Disclosure and Processing of Personal Data

3.1. Generally, Our Organisation may collect, use, disclose and/or process your Personal Data for the following purposes:

- (a) to communicate with you and to respond to your queries whether by email, postal mail or any other means;

- (b) to verify your identity;
- (c) to process any enquiry or request which you send to us;
- (d) to process any referral made by you concerning a prospective beneficiary;
- (e) to send you further information on events or activities to which you have signed up to participate;
- (f) to conduct surveys, research and statistical analysis with the aim of helping us monitor and improve our activities and event organisation;
- (g) to ensure the safety and security of our employees and others who might visit our premises;
- (h) to record, through videography, photography and/or audio recording, your participation in any of our events and/or activities for use in our outreach materials;
- (i) to monitor the performance of our website and facilitate the use of web forms and other elements used on the website;
- (j) to meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issues by any relevant competent authority; and
- (k) any other purpose reasonably related to any of the above.

3.2. If you are an existing or prospective beneficiary, Our Organisation may also collect, use and/or disclose your Personal Data for the following purposes:

- (a) to evaluate your suitability and/or eligibility for any of the programmes conducted by Our Organisation, including the Champions Unlimited programme;
- (b) to create and maintain records, including records in our player performance matrix, to track your development;
- (c) to generate publicity or outreach materials for our programmes and campaigns;
- (d) to generate periodic reports for our donors;
- (e) to communicate with you or your parent/guardian on any of the programmes conducted by Our Organisation, including the Champions Unlimited programme;
- (f) to plan, facilitate, manage and execute any arrangements necessary for the granting of a wish to you and any family member(s) who may accompany you for events, overseas trips, camps or any other activities which we may organise;
- (g) to contract and/or engage third party vendors and service providers such as tutors, caterers, transport agents, ticketing agents, travel agents, airlines and/or

medical staff where required for any events, overseas trips, camps or any other activities which we may organise;

(h) to make arrangements and liaise with any partners or affiliates where overseas travel is necessary; and

(i) any other purpose reasonably related to any of the above.

3.3. If you are an existing or prospective donor, Our Organisation may also collect, use and/or disclose your Personal Data for the following purposes:

(a) to solicit donations;

(b) to process any donation made by you;

(c) to create and maintain donor profiles in our systems for internal records and reference;

(d) to generate publicity materials for Our Organisation;

(e) to facilitate the processing of any tax deductions by the Inland Revenue Authority of Singapore for any qualifying donations which you make;

(f) to communicate with you concerning any donation made by you; and

(g) any other purpose reasonably related to any of the above.

3.4. If you are an existing or prospective volunteer, Our Organisation may also collect, use and/or disclose your Personal Data for the following purposes:

(a) to evaluate your suitability for service as a volunteer with Our Organisation;

(b) to create and maintain a volunteer database and management system;

(c) to manage Our Organisation's relationship with you as a volunteer;

(d) to facilitate our various programmes and events which you participate in;

(e) to generate publicity materials for Our Organisation;

(f) to communicate with you concerning Our Organisation's events, activities and volunteering opportunities; and

(g) any other purpose reasonably related to any of the above.

3.5. If you are an existing or prospective participant of our events and programmes:

- (a) to assess and process any applications or requests made by you for any of our events and programmes;
 - (b) to create and maintain your profile in our internal records;
 - (c) to generate publicity materials for Our Organisation; and
 - (d) any other purpose reasonably related to any of the above.
- 3.6. If you are an existing or prospective employee, Our Organisation may also collect, use and/or disclose your Personal Data for the following purposes:
- (a) to evaluate your suitability for service as an employee of Our Organisation and process your application (including any interviews and pre-recruitment checks on your qualifications);
 - (b) to obtain employee references and for background screening;
 - (c) to manage Our Organisation's relationship with you as an employee or prospective employee; and
 - (d) to communicate with you concerning your employment application and/or service as an employee of Our Organisation; and
 - (e) any other purpose reasonably related to any of the above.

4. Outreach / Optional Purposes

Where you have specifically provided us with your consent, we may also collect, use and/or disclose your Personal Data for the following purposes:

- (a) to send you news, updates and invitations in relation to activities and events organised by Our Organisation;
- (b) to send you information on our fund-raising campaigns; and
- (c) any purpose directly relating to any of the above.

5. Disclosure of Personal Data

Other than the purposes to which you have consented, we will keep confidential any Personal Data which you provide to us. However, subject to any applicable law, we may disclose your information in circumstances such as, but not limited to, the following:

- (a) where disclosure is necessary for any purpose which is clearly in your interest, if consent cannot be obtained in a timely way;
- (b) where disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (c) where disclosure is necessary for any investigation or proceedings;

- (d) where disclosure is to a public agency and such disclosure is in the public interest; and
- (e) where such disclosure without your consent is permitted and/or required by the PDPA or any other applicable law.

6. Use of Cookies

A cookie is a small text file that is placed on your computer when you visit certain websites. Our website may collect and store tokens of information ('identifiers') in your browser. The purposes for which we use cookies include, but are not limited to, monitoring the performance of our website, assessing the popularity of different sections of the site and facilitating the use of online web forms.

If you do not want to receive cookies from our website, you have the option of setting your browser to notify you when you receive cookies, so that you may determine whether to accept it or not. However, please be aware that if you do turn off cookies in your browser, you may not be able to fully utilise some of our website.

7. Links to Other Sites

Our website may contain links to other sites. We are not responsible for the privacy practices or the content of such websites.

8. Access, Correction and Withdrawal of Consent

8.1. Access

You may request access to your Personal Data currently within our possession and/or control. This should be done by submitting to a request to our Data Protection Officer via the email specified below or via mail to the address specified below. As our obligations under the PDPA require us to ensure that your Personal Data is protected, we will request information from you to verify your identity before disclosing any information to you. Following your request, our Data Protection Officer might also contact you in order to seek clarification on the specific information which you require.

We will respond to any request within a reasonable time of such a request being made, but in any case no later than 30 days from the date of the request. There may be circumstances where, by law, we will not be required or able to accede to your request. Where this is the case, we will notify you of this within a reasonable time.

Please note that we may charge a reasonable fee for the handling and processing of your request. You will be informed of the fee before your request is processed.

8.2. Correction

We will endeavour to ensure that your Personal Data is sufficiently accurate and complete in making any decision that impacts you.

You may request that corrections be made to your Personal Data in our possession. This should be done by submitting to a request to our Data Protection Officer via the email specified below or via mail to the address specified below. Following your request, our Data Protection Officer might also contact you in order to seek clarification on the specific information which you would like us to correct. We will respond to any request within a reasonable time of such a request being made, but in any case no later than 30 days from the date of the request. There may be circumstances where, by law, we will not be required or able to accede to your request. Where this is the case, we will notify you of this within a reasonable time.

8.3. Withdrawal of Consent

Where you have provided consent or your consent has been deemed, you may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession and/or under our control by submitting a request via email to our Data Protection Officer.

We will process your request within 10 days of receiving your notification. Please note that where your Personal Data is required for us to provide you with any services, we may cease the provision of such services without any liability.

9. Contact Us

If you have any questions relating to your Personal Data in our possession, or would like to make any requests concerning such data, please contact our Data Protection Officer using the contact information provided below:

- Email: [Wenjin@footballplus.com.sg]
- Office Address: [Wenjin to update]
- Telephone: +65 [Wenjin to update]

Date: [20 July 2023] [Wenjin to update]