



# Porsche Club

Singapore



## DATA PROTECTION POLICY

This Data Protection Policy outlines how Porsche Club Singapore (hereinafter “**the Club**”) collects, processes and uses Personal Data in accordance with the Singapore Personal Data Protection Act 2012 (“**PDPA**”). Personal Data will generally only be collected and used for legitimate purposes and only to the extent necessary to achieve those purposes.

### **1** DEFINITIONS AND INTERPRETATION

The following terms shall have the following meanings:-

**Club Constitution** means the document that governs the Club and its practices;

**Individuals** mean the volunteers, members and sponsors of the Club;

**Organisation** means any individual, company, association or body of persons, corporate or unincorporated, whether or not formed or recognised under the law of Singapore; or resident, or having an office or a place of business in Singapore, as defined under section 2 of the PDPA;

**Personal Data** means the data whether true or not, about an individual who can either be identified from that data; or from that data and other information to which the Club has or is likely to have access, as defined under section 2 of the PDPA;

## **2 PURPOSE OF THE COLLECTION, USE, DISCLOSURE OF THE PERSONAL DATA**

2.1 The Club was formed by a group of Porsche enthusiasts keen on participating in organised Porsche driving activities. Individuals are involved in the activities of the Club, ranging from motoring to social and charity, to cater to the interests of members of the Club and also with aims of giving back to society.

2.2 The Personal Data as described in detail below are collected, processed, disclosed and/or used by the Individuals for their own purposes in order to be able to perform their club objectives as set out above and as stated in the Club Constitution.

2.3 The abovementioned purposes shall be communicated to the Individual from whom the data is being collected, processed, disclosed and used, before such collection, processing, disclosure or use, or as soon as practicable to do so.

## **3 USAGE OF PERSONAL DATA**

The following are examples of Personal Data which the Club typically collects, retains, uses, and discloses (where appropriate and necessary):-

### **3.1 Data for Administrative Purposes**

- Name
- Private contact details
- Emergency contact data
- Date of birth
- Nationality
- Passport details
- Family details
- Education data
- Job details
- Income details
- Purchase history of Porsches and/or other automobiles

### 3.2 Data for Security Purposes

- Access control data
- Video surveillance data

### 3.3 Data for other Purposes

- Timekeeping information
- Inventory management system data
- Communication data
- Photographs
- Multi-media and videos

## 4. **CONSENT OBLIGATION**

4.1 The Club shall obtain the consent of Individuals before collecting, storing, processing, using, transferring, sharing or disclosing Personal Data of the respective Individuals, including sensitive Personal Data, for purposes necessary or desirable in connection with the Club.

4.2 Such purposes include sharing information with any third party engaged by the Club, whether in Singapore or outside Singapore, including but not limited to any other Affiliate or Member Clubs of Dr.Ing.h.c.F. Porsche AG..

4.3 Individuals shall be taken to have consented to the collection, procession, disclosure or use of their Personal Data upon their endorsement of this Policy, whether online or by signing a letter of consent if the application or renewal or membership is done via hard copy.

4.4 Individuals may choose to abstain from giving such consent or withdraw their consent at any time. Individuals may withdraw their consent by notifying the Club at [<contact\\_us@porscheclub.org.sg>](mailto:contact_us@porscheclub.org.sg). In the event where consent has been withdrawn or the provision of the same is abstained, the Club shall not be responsible and/or liable for any loss, damage or harm resulting from, directly or indirectly, its inability to retrieve, use and/or disclose such Personal Data.

4.5 For the avoidance of doubt, where consent is not necessary in the situations provided for in the Second, Third and Fourth Schedule of the PDPA, including but not limited to the following instance:-

- the collection, disclosure and/or use is necessary for any purpose that is clearly in the interest of the respective Individuals, if consent for its collection, disclosure and/or use cannot be obtained in a timely way or the respective Individuals would not reasonably be expected to withhold consent; or
- the collection, disclosure and/or use is necessary to respond to an emergency that threatens the life, health or safety of the respective Individuals or other Individuals;

the Club shall have the discretion to decide what appropriate action to take and need not consult the relevant Individuals accordingly.

## **5. PROTECTION OF PERSONAL DATA IN ANY COMPLAINTS**

5.1 Complaints from the respective Individuals regarding privacy issues will be handled by the Data Protection Officer or Vice-Data Protection Officer and may be referred to the General Committee.

## **6. ACCESS AND CORRECTION OF DATA**

6.1 The Club shall upon request, provide the respective Individuals access to their Personal Data, which is under the Club's control.

6.2 The Club shall also upon request, provide the respective Individuals with information regarding the ways such Personal Data was used or disclosed during the past year.

6.3 The Club shall upon request, correct any error or omission in the respective Personal Data of the Individuals that is under the Club's control.



## **7. ACCURACY OF DATA**

7.1 The Club shall take reasonable measures to ensure that the Personal Data in its possession is accurate and complete if the Personal Data is likely to be used to make a decision that affects the respective Individuals the Personal Data relates to, or if the Personal Data is likely to be disclosed to another Organisation.

7.2 While the Club shall take reasonable steps to update and ensure the accuracy of the Personal Data in its database, Individuals are ultimately responsible for the submission of correct Personal Data and to inform the Club of any changes to such Personal Data as the Club shall not be obliged to carry out checks to determine the accuracy of the Personal Data provided.

## **8. DATA RETENTION PERIODS**

8.1 The Club shall not retain the Personal Data in its possession and/or database if the Personal Data is no longer required to meet the purposes for which they were collected and/or no longer serves a legal and/or business purpose.

8.2 For the avoidance of doubt, the Club shall be entitled to retain and/or use such Personal Data as long as it serves an evaluative purpose.

## **9. TRANSFER OF PERSONAL DATA TO THIRD PARTIES**

### ***9.1 Potential Transfers***

Personal Data may be transferred to law enforcement, governmental agencies, or authorized third parties, in response to a verified request relating to a criminal investigation or alleged illegal activity or any other activity that may expose the Club to legal liability.

### ***9.2 Restrictions of Data Transfer Outside of Singapore***

Personal Data transferred out of Singapore shall be protected with a standard of protection that is comparable to the protection under the PDPA.

**10. DATA PROTECTION OFFICER (“DPO”)**

10.1 The Club shall appoint at least one (1) DPO, whose business contact details shall be made available to the public.

10.2 The Club may appoint a Vice-Data Protection Officer (“VDPO”) to the DPO accordingly. The VDPO shall act on behalf of the DPO in the event of the DPO being indisposed.

10.2B All Individuals whose Personal Data are in the Club’s possession, are entitled to contact the DPO and/or VDPO with enquiries regarding how the Club processes Personal Data, or to access and modify Personal Data to the extent that they cannot do so on their own.

**11. TECHNICAL AND ORGANISATIONAL METHODS TO SECURE DATA**

The Club has implemented and maintains reasonable technical, physical, and administrative security measures for the security of Personal Data including regarding loss, misuse, unauthorised access, disclosure, or alteration.

**11.1 *Access control to premises and facilities***

Technical and organizational measures to control access to premises and facilities, particularly to check authorisation:

- Access control system
- ID Reader/ Magnetic Card
- Issuing of keys to Personnel with clearance
- Electronic Door Security System
- Security Staff
- Surveillance facilities
- Alarm system/ CCTV

## 11.2 *Access control to systems*

Technical (ID/password security) and organizational (user master data) measures for user identification and authentication:-

- Password procedures (requirement of minimum length, alpha-numeric and periodic change of password)

## 11.3 *Access control to data*

Requirements-driven definition of the authorisation scheme and access rights, and monitoring and logging of accesses:-

- Differentiated access rights based on roles and transactions

## 11.3 *Disclosure control*

Measures to transport, transmit and communicate or store data on data media (manual or electronic) and for subsequent checking:-

- Encryption
- Electronic Signature

## 11.4 *Input control*

Measures for subsequent checking whether data have been entered, changed or removed (deleted), and by whom:-

- Log-in details and records
- Intelligent Reporting system

## 11.5 *Availability control*

Measures to assure data security (physical/logical):-

- Backup procedures
- Anti-virus/ Firewall systems
- Mirroring of hard disks
- Remote storage of data
- Data Recovery Plan

**12. UPDATES TO THIS POLICY**

The Club reserves the right to update this policy from time to time. Consent to prior versions of this policy is deemed consent to a newer version, too, if not objected within ten (10) days of such update.

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Updated as of December 2014.

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