

Lions Protheses Centre (Singapore)

Personal Data Protection (PDPA) Policy

Policy title	Personal Data Protection (PDPA) Policy
Policy owner	Secretary, Data Protection Officer ("DPO")
Approved by	Management Board of Lions Protheses Centre (Singapore)
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1. Introduction and Purpose

1.1 Lions Prostheses Centre (Singapore) ("**LPC**") collects, uses and discloses personal data in the course of providing prosthetic limbs and related support to low-income amputees, managing donors and fundraising, engaging volunteers and members, and employing staff. Much of LPC's beneficiary data is **sensitive medical and financial information** (e.g. amputation and clinical records, residual limb measurements and photographs, means-testing details), which demands a high standard of care.

1.2 This Policy sets out how LPC complies with the **Personal Data Protection Act 2012 ("PDPA")**, having regard to the PDPC's Advisory Guidelines for the Social Service Sector (revised 18 January 2024), and with the separate duty, as an IPC, under **regulation 8(1)(c) of the Charities (Institutions of a Public Character) Regulations**, to keep all information relating to every donor confidential and not to disclose it to any other person except as authorised by or under any law or with the donor's consent.

1.3 **Scope.** This Policy binds all Management Board and Sub-Committee members, staff, volunteers and interns of LPC, and applies to all personal data in LPC's possession or control, in any form. Volunteers acting in the course of their duties are treated in the same way as employees for PDPA purposes; LPC remains responsible for their handling of personal data, and volunteers must comply with this Policy and sign the confidentiality undertaking in the Volunteer Management Policy.

2. Personal Data Held by LPC

2.1 "Personal data" means data about an individual who can be identified from that data or together with other information LPC has or is likely to have access to, and includes photographs and video. LPC handles personal data of the following groups for the following main purposes:

Group	Typical data	Main purposes
Beneficiaries (amputees) and their family members/caregivers	Name, NRIC/FIN, contact details; medical and amputation history, clinical assessments, residual limb measurements and photographs; household income and means-testing documents	Assessing eligibility; fabricating, fitting and maintaining prostheses; care coordination and referrals; subsidy administration; reporting to funders (anonymised/aggregated where possible)
Donors and sponsors	Name, NRIC/FIN/UEN or business registration number, contact details, donation records (date, type, amount, any terms) — as required by IPC Reg. 10(2)	Processing donations and issuing tax deduction receipts (including mandatory submission of donation records to IRAS); donor communications and fundraising appeals; statutory record-keeping. Donor information is kept confidential under IPC Reg. 8(1)(c)
Volunteers	Name, NRIC/FIN, contact details, skills, availability; screening declarations for roles with beneficiary contact	Recruitment, screening, deployment, training, insurance, recognition
Member clubs' delegates and representatives (LPC's members are Lions Clubs, i.e. organisations)	Delegate/representative name, club, contact details	Membership administration, notices of General Meetings, elections and governance under LPC's Constitution

Group	Typical data	Main purposes
Employees and job applicants	Identification, contact, qualifications, employment and payroll data	Recruitment, employment administration, payroll/CPF, statutory obligations
Event participants and website users	Registration details; photographs/videos at events	Event administration; publicity, newsletters and fundraising materials (with consent/notification)

3. Data Protection Officer

3.1 The Management Board designates the **Secretary** to be the **Data Protection Officer**, and makes the DPO's business contact information publicly available. **This obligation applies regardless of LPC's size.** The DPO's business contact information is published on LPC's website and in its privacy notice: **[Name/designation], [secretary@lpc.org.sg] or [enquiry@lpc.org.sg], [telephone]** [mailbox to be set up; may be a general office contact answered during Singapore business hours]. The DPO may delegate tasks but remains accountable for LPC's compliance.

3.2 The DPO: maintains this Policy and LPC's data protection practices; maintains the personal data inventory and retention schedule; handles access, correction and withdrawal requests and complaints; manages data breach response; conducts staff and volunteer briefings; and reports to the Management Board at least annually. [LPC is encouraged to register its DPO with the PDPC at go.gov.sg/registerdpoinfo.]

4. Consent

4.1 LPC collects, uses or discloses personal data only with the individual's consent, or under deemed consent or an exception provided by the PDPA.

4.2 **Beneficiaries.** Consent is obtained in writing at intake, covering the collection of medical and financial information, clinical photography for treatment records, and disclosure to treating clinicians, hospitals or partner agencies involved in the beneficiary's care. Where a beneficiary lacks capacity or is a minor, consent is obtained from a person validly acting on their behalf (e.g. parent, guardian or donee).

4.3 **Photography and media.** Photographs or videos of beneficiaries intended for newsletters, the website, social media or fundraising materials require **separate, specific consent** — this is never bundled with consent for service delivery, and a beneficiary's refusal never affects their access to LPC's services. Event photography is covered by prominent notices at events; volunteers who take photographs may not retain or use them for personal purposes.

4.4 **Donors.** By making a donation and providing their NRIC/FIN/UEN for a tax deduction receipt, donors are deemed to consent to the processing of their data for donation administration, receipting and the mandatory transmission of donation records to IRAS.

4.5 **Withdrawal.** An individual may withdraw consent at any time on reasonable notice, in writing to the DPO. LPC will explain the likely consequences (which may include inability to continue providing services), effect the withdrawal within [30] days, and cease the relevant collection, use or disclosure unless otherwise authorised by law.

5. Purpose Limitation and Notification

5.1 LPC collects only personal data that is reasonably necessary for the purposes in paragraph 2.1, and notifies individuals of those purposes on or before collection — through its intake, donation, volunteer and membership forms and the **Privacy Notice published at lpc.org.sg**

5.2 Personal data is not used for a different purpose without fresh consent or a legal basis. Where LPC relies on the legitimate interests exception (e.g. sharing data with another social service agency to coordinate a beneficiary's care), this reliance is stated in the published Privacy Notice.

6. Access and Correction

6.1 Individuals may request access to their personal data and information about how it has been used or disclosed in the past year, or request correction of an error or omission, by writing to the DPO.

6.2 LPC responds as soon as possible and within **30 days**; if longer is needed, the individual is informed of the soonest practicable time. A reasonable administrative fee may apply to access requests (quoted in advance). Corrections are made promptly and, where appropriate, sent to organisations to which the data was disclosed within the preceding year. Access may be refused where an exception under the PDPA applies (e.g. where disclosure could harm the individual or reveal another person's data).

7. Accuracy

7.1 LPC takes reasonable steps to keep personal data accurate and complete, especially beneficiary clinical and means-testing records used to make decisions about care and subsidies, which are verified at intake and updated at each review or fitting.

8. Protection

8.1 LPC protects personal data with reasonable administrative, physical and technical safeguards, proportionate to sensitivity — beneficiary medical data receives the highest tier:

- **need-to-know access** — beneficiary case files and clinical photographs are accessible only to those directly involved in the beneficiary's care (LPC's staff, and designated Management Board members and authorised clinical volunteers);
- physical records kept in locked cabinets on LPC's premises; visitor access controlled;
- electronic records password-protected with individual user accounts; portable devices and removable media encrypted; screens locked when unattended;
- personal data sent externally only via secured channels; email attachments containing sensitive data password-protected;
- access rights reviewed on role change or departure; volunteer sign-up and beneficiary data never stored on personal devices without authorisation;
- third parties processing data for LPC (e.g. IT vendors, mailing houses) are bound by written contracts imposing PDPA-equivalent protection and are treated as data intermediaries.

9. Retention Limitation

9.1 Personal data is retained only as long as needed for the purpose or a legal/business requirement, per LPC's retention schedule [indicative — to be confirmed]:

Records	Retention period
Beneficiary case and clinical records	[5] years after last service contact, then securely destroyed
Donation records and tax deduction receipts	At least 5 years from the end of the relevant Year of Assessment.
Accounting and audit records	At least 5 years from the end of the financial year to which the entry relates.
Volunteer records	[2] years after cessation of volunteering
Employee records	Per employment law requirements; [5] years after cessation
Unsuccessful job/volunteer applications	[6] months unless consent to retain

9.2 Documents are destroyed securely (shredding; secure deletion of electronic media). Anonymised data may be retained for statistics and reporting.

10. Transfer Limitation

10.1 LPC does not transfer personal data outside Singapore unless the recipient is bound by legally enforceable obligations to provide a standard of protection comparable to the PDPA (e.g. cloud or CRM providers hosting data overseas under appropriate contract terms).

11. Data Breach Management

11.1 Any suspected loss, unauthorised access or disclosure of personal data must be reported to the DPO **immediately**. The DPO contains the breach, assesses it within **30 days**, and documents the assessment.

11.2 LPC notifies the **PDPC within 3 calendar days** of assessing that a breach (a) is likely to result in significant harm to affected individuals — noting that prescribed categories under the **Personal Data Protection (Notification of Data Breaches) Regulations 2021** include an individual's **health and medical information**, which LPC holds for its beneficiaries — or (b) affects 500 or more individuals. Affected individuals are also notified where significant harm is likely, unless an exception applies. Contractual breach-reporting to funders or agencies is in addition to, not instead of, PDPC notification.

12. Do Not Call (DNC)

12.1 Before sending telemarketing-type messages or calls to Singapore telephone numbers promoting goods, services or events, LPC checks the DNC Registers, unless the individual has given clear consent or the ongoing-relationship exclusion applies. Pure donation appeals that do not advertise goods or services generally fall outside the DNC "specified message" regime; where in doubt, the DPO is consulted. Every marketing message includes an unsubscribe option, honoured within the statutory period.

13. Training, Compliance and Review

13.1 All office bearers, staff and volunteers are briefed on this Policy on appointment or onboarding and at least [annually]; volunteers with access to beneficiary data receive the NCSS/PDPC volunteer data-protection guidance and sign a confidentiality undertaking.

13.2 Breaches of this Policy by office bearers, staff or volunteers may result in disciplinary action or termination of engagement. Concerns about data misuse may also be raised under the Whistleblowing Policy.

13.3 The DPO reviews this Policy at least annually against PDPC guidance, reporting to the Management Board; material changes are approved by the Management Board. [LPC may use the PDPC's free PDPA Assessment Tool for Organisations (PATO) and Data Protection Essentials programme for periodic self-assessment.]

14. Contact

14.1 Questions, requests or complaints under this Policy: **Data Protection Officer**, Lions Protheses Centre (Singapore), Blk 465 North Bridge Road, #02-5051, Singapore 191465; [enquiry@lpc.org.sg]; [telephone]. Individuals who remain dissatisfied may approach the Personal Data Protection Commission (pdpc.gov.sg).