

## **The Singapore Cricket Club Privacy Policy**

Respecting and protecting the privacy of individuals is important to the Singapore Cricket Club (“SCC”), therefore SCC conducts its business in compliance with applicable laws on personal data protection and data security. .

This policy sets out the manner in which SCC collects, uses and manages and protects personal data (as defined below) in compliance with the provisions of the Personal Data Protection Act 2012 (“PDPA”).

This policy applies to all individuals who provide SCC with personal data or whose personal data is otherwise collected, used and/or disclosed by SCC in connection with and/or for the purpose of its operations.

SCC may from time to time update this policy to ensure it is consistent with its future developments or business purposes or its future operations or to accommodate future changes to applicable legal or regulatory requirements. All updates to this policy will be published at SCC’s website (<http://www.scc.org.sg/>) and appropriate notifications of any material revisions will be issued to the relevant persons or members. Subject to an individual’s rights at law, the prevailing terms of the policy from time to time shall apply. By continuing their relationship with SCC after any amendments have been introduced and published, individuals shall be deemed to have accepted the policy.

For the avoidance of doubt, this policy forms part of the terms and conditions, if any, governing an individual’s specific relationship with SCC and should be read in conjunction with such terms and conditions. In the event of any conflict or inconsistency between the provisions of this policy and the said terms and conditions, if any, the provisions of the terms and conditions shall prevail to the fullest extent permissible by law.

Visitors to the SCC’s website are deemed to have agreed to the terms and conditions of this Privacy Policy.

### **1. Definitions**

**“Data Protection Officer”** means that the person designated to be responsible for ensuring that SCC complies with PDPA;

**“DNC Registry”** means the Do-Not-Call Registry maintained by the Personal Data Protection Commission, pursuant to the PDPA;

**“Event/Tournament/Programme Participant”** means persons (whether or not Members) who participate in or attend events or programmes or tournaments or sporting activities organised or sponsored by SCC from time to time;

**“Guests”** means persons being introduced by the Members of SCC from time to time;

**“Individual”** means natural persons, whether living or deceased, and “individuals” means any of them;

“**Members**” means the members of SCC from time to time;

“**PDPA**” means the Personal Data Protection Act 2012;

“**Personnel**” shall include any person engaged under a contract of service or contract for service with SCC, management personnel, permanent or temporary employees, as well as trainees, interns and volunteers engaged by SCC from time to time;

“**Personal data**” or “**Personal information**” is data or information that can be used to identify an individual;

“**Potential Members**” shall include any individual who has submitted an application to be a member of SCC; and

“**Potential Personnel**” shall include any individual who has submitted an application to be engaged by SCC as Personnel.

## **2. Collection of Personal Data**

SCC will only collect, use or disclose an individual’s personal data which it reasonably considers necessary for the relevant purposes underlying such collection, use or disclosure. Depending on the specific nature of an individual’s interaction or relationship with SCC, personal data which SCC collects, uses or discloses concerning an individual may vary. The types of data collected by the SCC may include, but is not limited to: -

- a. Personal information including an individual’s name, gender, date of birth, identification numbers including Singapore NRIC / FIN numbers, passport number, applicable visa or permit such as employment pass, work permit, permanent residency status, etc.;
- b. Contact information including telephone numbers, addresses, personal email addresses, etc.;
- c. Payment Information including details of an individual’s CPF account, credit card(s), bank account(s), etc.;
- d. Employment information including employment history and details of former employers;
- e. Qualification information including academic qualifications, sports qualification, etc.;
- f. Resume, such as an individual’s work resume for employment purposes or sports resume for application of sports membership, etc.;
- g. Family information including the name, relationship, contact information of the individual’s next of kin, spouse and children;
- h. Preferences information, such as details of the individual’s personal preferences or other special requests or special conditions applicable to the individual;
- i. Personal interest information, for example the individual’s hobbies, interests, etc.;
- j. Membership information including memberships with other clubs or associations;
- k. Technical information gathered automatically by our computer systems/website, etc.;
- l. Other information including photographs, videos and CCTV recordings of the individual and any other information that the individual may from time to time provide SCC through the course of an individual’s interactions with SCC.

SCC collects an individual's personal data through various ways, including but not limited to:-

- a. Forms submitted to SCC, including membership application forms, employment application forms, registration forms, attendance forms, etc.;
- b. Correspondence with or including SCC, including emails, electronic messages, paper mail, etc.;
- c. Verbal communication, for example when an individual speaks directly to SCC Personnel, etc.;
- d. Surveys, including online surveys conducted by SCC or its designated agents, etc.;
- e. Website, including an individual's access or navigation through our website, etc.;
- f. Images including video recordings, CCTV recordings, and photographs when an individual attends a SCC organised or sponsored event, tournament or programme;
- g. Business partners and suppliers, who may furnish an individual's personal data to SCC through the course of their commercial dealings with SCC;
- h. Visiting teams' information including details of players;
- i. Personal information relating to visiting members from reciprocal clubs; and
- j. Information submitted by individuals including personal data for any reason related to SCC's ordinary course of operations and business.

### **3. Purpose of Use**

SCC may collect, use and/or disclose an individual's personal data for the following purposes:-

#### Members and Potential Members

- a. Administration and management of Members' and Potential Members' relationships with SCC including providing services to Members and Potential Members;
- b. Provision of information to our Members and/or Potential Members about our services, facilities and/or other benefits being offered and made available to our Members and/or Potential Members;
- c. Provision of information to our Members and/or Potential Members about third party and/or external vendor/supplier promotions, deals and/or other services being offered or made available to our Members and/or Potential Members;
- d. Event/Tournament/Programme organisation and facilitation, including organising and facilitating Events/Tournaments/Programmes for or in respect of our Members and/or Potential Members, and also for verification of the eligibility of such Members and/or Potential Members to participate in such Event/Tournament/Programme;
- e. Publicity purposes including recording of videos or taking photographs of Members and/or Potential Members during Events/Tournaments/Programmes organised by SCC;
- f. Evaluation of the suitability and eligibility of Potential Members to be a member of SCC;
- g. Improvement of facilities/services/activities in respect of Members and/or Potential Members, by tailoring such facilities/services/activities to match the needs and preferences of our Members and/or Potential Members;

- h. Investigation purposes, including for disciplinary cases, which may include or necessitate the viewing of images including video recordings, CCTV recordings and photographs of Members and/or Potential Members; and
- i. Transmission of personal data to thirty parties engaged by or working in collaboration with SCC to facilitate any of the above mentioned purposes.

#### Personnel and Potential Personnel

- a. Administration and management of Personnel relationships and activities with SCC including the provision of services to our Personnel;
- b. Evaluation of Personnel's performance;
- c. Organisation of staff training and other staff or employment related activities;
- d. Promotional and publicity purposes, including recording of videos or taking photographs of Personnel during Events/Tournaments/Programmes organised by SCC;
- e. Disciplinary purposes;
- f. Investigation purposes;
- g. Statistical purposes;
- h. Evaluation of the suitability and eligibility of a potential Personnel; and
- i. Transmission of personal data to third party engaged by or working in collaboration with SCC to facilitate any of the above mentioned purposes.

#### Event/Tournament/Programme Participants

- a. Administration and management of Event/Tournament/Programme participant's relationship with SCC;
- b. Verification of the identity and eligibility of Event/Tournament/Programme participants;
- c. Promotional and publicity purposes, including recording of videos or taking photographs of participants at Event/Tournament/Programme;
- d. Transmission of personal data to third parties engaged by or working in collaboration with SCC for any of the above-mentioned purposes.

#### Guests

- a. Recording and verification of Guests' identity in SCC's premises;
- b. Management and monitoring of Guests' activities within SCC's premises.

#### General Business Purposes

- a. Management of the administrative and business operations of SCC;
- b. Facilitation of completion of transactions with individuals;
- c. SCC's response to complaints, queries and/or requests;
- d. Conduct of market research for statistical profiling and other purposes for the improvement of SCC's facilities/services/activities and/or improvement of SCC's Personnel services and activities;
- e. Safety and security;
- f. Record keeping ;
- g. Prevention, detection and investigation of any misconduct, complaint, crime, fraud, unlawful action, breach of SCC's Club Rules and Bye-laws, disputes, etc.;

- h. Accounting or auditing ;
- i. Debt collection and recovery;
- j. Legal purposes or obtaining legal advice;
- k. Compliance with laws, regulations, codes or guidelines binding on SCC including disclosures to regulatory authorities or other public bodies; and
- l. Transmission of personal data to third parties engaged by or working in collaboration with SCC to facilitate any of the above-mentioned purposes.

SCC may also collect, use and/or disclose individual's personal data for any other purposes reasonably related and/or ancillary to any of the above mentioned purposes.

#### **4. Sharing of Information**

SCC does not sell or otherwise market personal data to third parties. SCC also requires its third party partners and service providers who possess and/or process personal data on its behalf to adhere to similar data protection standards as the PDPA legal framework in Singapore.

SCC may share anonymous or aggregate information with other Clubs and with third parties, including advertisers and sponsors. Aggregate or anonymous information does not contain any personal data, and accordingly its use and disclosure is not subject to the terms and conditions of this Privacy Policy.

The SCC website may contain links to third party websites, which are not controlled by SCC and which are not covered by this Privacy Policy. SCC is not responsible for the privacy practices or the content of such other websites. Before you enter information on to those websites, you should look at their privacy policy and terms and conditions of use.

#### **5. Consent**

SCC will not collect, use and/or disclose an individual's personal data without his/her consent except as provided for in this Privacy Policy or as required by law (for example, disclosure to the Courts or various Government departments) or if we genuinely believe it is necessary to (i) act under exigent circumstances to protect the rights, property or personal safety of our Members or Guests, or any member of the public; (ii) protect and defend the rights or interests or property of SCC; and/or (iii) obtaining legal advice.

SCC will take reasonable steps to highlight the purposes relevant to an individual at the point or time of collection of the individual's personal data via appropriate means, including but not limited to:

- a. express provisions in contracts, application forms and/or registration forms to be signed with or submitted to SCC;
- b. notifications on SCC's website;
- c. verbal communications;
- d. correspondence through mail, email or electronic messages.

SCC will inform the individual of purposes (whether intrinsic or optional) to the relationship between SCC or provision of services to such individuals whenever feasible. SCC reserves the right to decline to engage in the relevant relationship with an individual or provide any relevant services to him or her if that individual does not consent to SCC's collection, use or disclosure of his or her personal data for those purposes that are intrinsic to the relationship or provision of services.

Individuals who voluntarily provide personal data to SCC for specified purposes; use or access SCC's website or computer network; enter SCC's premises and/or attend or participate in events/tournaments/programmes/activities organised by SCC will be deemed to have agreed and consented to SCC collecting, using and/or disclosing their personal data in the manner and/or for the purposes set forth in this Privacy Policy. In addition, individuals who voluntarily provide personal data to SCC for specified purposes will also be deemed to consent to the collection, use and disclosure of the said personal data by the Club for the purposes for which the said personal data had been provided to SCC.

An individual who provides SCC with the personal data of third parties, including but not limited to information regarding his or her spouse or children for any particular purpose, represents to SCC that consent has been obtained from the relevant third parties to allow SCC to collect, use and/or disclose their personal data for the relevant purpose(s) concerned. In such an instance, SCC will rely on the individual to inform these third parties that their personal data is being provided to SCC, and also to advise them about where they can find a copy of this Privacy Policy (i.e. on the SCC website).

Insofar as SCC collects personal data of an individual from any third party, such as Reciprocal Club or Visiting Club and/or other business partners or associates of SCC, SCC will take reasonable steps to inform the relevant third party of SCC's purpose(s) for collecting the personal data and also require the third party to obtain consent from the individual(s) concerned in order that the said personal data may be disclosed to and collected by SCC via that third party.

## **6. Withdrawal of Consent**

An individual who wishes to withdraw his or her consent to the collection, use or disclosure of his or her personal data may at any time do so by notifying SCC's Data Protection Officer at [dataprotection@scc.org.sg](mailto:dataprotection@scc.org.sg), stating the following information:-

- a. Name and identification number
- b. Membership number (if a Member);
- c. The purpose(s) for which the individual wishes to withdraw consent.

SCC may require up to 3 weeks, from the date of the individual's notification or request, to respond and effect any change.

Please note that SCC may be unable to continue to provide certain products and/or services to an individual as a result of that individual's withdrawal of consent, and that such withdrawal of consent will not affect any legal consequences arising from such withdrawal.

In the event that a Member wishes to withhold or withdraw his or her consent for SCC to collect, use or disclose his / her personal data, please take note that:-

- a. Where the collection, use or disclosure of the Member's personal data is necessary in order for SCC to administer and/or maintain and/or further his or her membership with SCC, the Member's withdrawal of consent in such situations may result in the SCC being unable to continue administering or maintaining or furthering his or her membership with SCC. However, as stated above, please note that this will not affect any legal consequences arising from such withdrawal of consent.
- b. That being said, a Member may opt to withdraw his or her consent for SCC to collect, use or disclose his or personal data for the following purposes, namely:-
  - (i) For SCC to provide him or her with information, promotion or marketing materials in relation to SCC's organised events / tournaments / activities / programmes, offers and/or benefits being offered and/or made available to Members; and/or
  - (ii) For SCC to provide him or her with information regarding promotions, deals and/or other services being offered and/or made available to Members by SCC's third party and/or external vendors/suppliers,

although in such an instance, SCC may as such not be able to accord the Member concerned the full extent of the personalised and comprehensive membership experience that SCC had designed for its Members.

## **7. Personal Data Collected before 2 July 2014**

SCC will continue to use an individual's personal data that was collected before 2 July 2014 for the purposes of which such personal data was collected, unless consent is withdrawn by that individual.

## **8. DNC Registry**

SCC will not send unsolicited telemarketing messages to Singapore telephone numbers through voice calls, text or fax messages registered on the DNC Registry unless SCC has obtained the relevant individual's clear and unambiguous consent in written or other accessible forms in order to comply with the PDPA.

SCC will continue to contact individuals at the telephone numbers provided to SCC in order to undertake regular Club business

## **9. Access, Correction, Verification and Notification of Changes in Personal Data**

An individual may at any time request to (i) access his or her personal data held by SCC; (ii) know how his or her personal data has been or will be used by SCC; (iii) correct or update or

delete any inaccurate or outdated personal data held by SCC. Such request(s) must be submitted in writing to the SCC\_Data Protection Officer at [dataprotection@scc.org.sg](mailto:dataprotection@scc.org.sg), and must include proof of that individual's identity as well as specify any membership reference numbers or employee number, where applicable.

SCC may charge an administrative fee to cover the reasonable costs of retrieving the information and supplying it to the individual concerned. SCC may also refuse or restrict an individual's request for access to his or her personal data, such as where the personal data relates to ongoing or anticipated legal or disciplinary proceedings, or where the request is frivolous or vexatious. If SCC denies or restricts any access, we will explain why as required by applicable laws.

Information voluntarily submitted by an individual to SCC shall prima facie be deemed complete and accurate.

Where feasible, SCC will take reasonable steps to verify the accuracy of any personal data received, at the point of collection. However, individuals remain primarily responsible and liable to ensure that all the personal data that they submit to SCC is complete and accurate.

SCC shall also take reasonable steps to periodically verify personal data in its possession, taking into account the exigencies of its operations. However, it is the responsibility of each Member and Personnel to periodically update SCC of any changes that should be made to his or her personal data.

SCC shall not be held liable for any inability on its part to provide services to an individual if that individual does not notify SCC of any relevant changes to his or her personal data or fails to submit complete and accurate personal data to SCC.

## **10. Protection of Personal Data**

SCC takes reasonable precautions to protect an individual's personal data and store it securely. Reasonable steps are taken and reasonable security arrangements are made to prevent unauthorised access, collection, use, disclosure, copy, modification, disposal or similar risk to personal data in the SCC's possession.

SCC will take reasonable steps to ensure that third parties who receive personal data from SCC protect such personal data in a manner consistent with this policy and/or the PDPA and will not use such personal data for any other purposes other than those specified by SCC, by incorporating appropriate contractual terms in its written agreements with these third parties or the provision of a written undertaking from these third parties.

SCC is not responsible in any way for the security and/or management of personal data shared by individuals with third party websites accessible via links on SCC's website, nor is it responsible for the privacy practices or the content of these websites.



## **11. Retention of Personal Data**

SCC will retain personal data for the period necessary to fulfil the purposes set out in Clause 3 above and any legal or business purpose, after which we will take reasonable efforts to ensure that such personal data in our possession or under our control is destroyed.

In cases where an individual ceases to be a Member or Personnel of SCC, whether having terminated/resigned/defaulted his/her membership or terminated/dismissed/resigned as an employee, SCC has the right to retain that individual's records and use his or her information for legal and/or business purposes.

## **12. Use of Cookies**

Currently, SCC does not use cookies at our website but may do so in the future. In the event of changes in the future, SCC will update this policy with the relevant information on the use of cookies at the SCC website.

## **13. Questions**

For any questions or queries with regards to this policy, please contact our Data Protection Officer at [dataprotection@scc.org.sg](mailto:dataprotection@scc.org.sg). You will then be contacted within thirty (30) days by the relevant Data Protection Officer.

## **14. Changes to Policy**

SCC reserves the right to modify or change this policy at any time. Any change or modification of this policy will be posted on the SCC website. SCC encourages individuals to check the SCC website and the terms of this policy regularly to keep up to date.

The continued use of our website and the acceptance or engagement of our services at SCC after any changes to this policy constitutes consent to any such changes, to the extent that such consent is not otherwise expressly withdrawn.