



## **Data Protection Policy**

This document ("Data Protection Policy") applies to all personal data collected by Daughters Of Tomorrow Limited ("DOT").

The purpose of this Data Protection Policy is to inform you of how DOT manages Personal Data which is subject to the personal data protection principles under Singapore's Personal Data Protection Act ("the Act") or similar personal data protection principles applicable to all organisations. Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or signing up for any programmes and services offered by us, you agree and consent to DOT, as well as our respective representatives and/or agents collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to DOT's authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any previous consent you may have provided to DOT in respect of your Personal Data, and your consent herein is additional to any rights which DOT may have at law to collect, use or disclose your Personal Data.

DOT may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Protection Policy as updated from time to time on our website [www.DaughtersOfTomorrow.org](http://www.DaughtersOfTomorrow.org). Please check our website regularly for updated information on the handling of your Personal Data.

### **1. Personal Data**

- 1.1. In this Data Protection Policy, "Personal Data" refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- 1.2. Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

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

- 2.1. Generally, we collect Personal Data in the following ways:
  - (a) when you submit an application form or registration form, or other forms relating to any of our products and services;
  - (b) when you enter into any agreement or provide other documentation or information in respect of your interactions with us, or when you use our services;



- (c) when you interact with our customer service officers, for example, via telephone calls, letters, face-to-face meetings, social media platforms and emails;
  - (d) when you use our electronic services, or interact with us via any of our websites or use services on any of our websites;
  - (e) when you request that we contact you or request that you be included in an email or other mailing list;
  - (f) when you respond to our promotions, initiatives or to any request for additional Personal Data;
  - (g) when your images are captured by us via CCTV cameras while you are within our premises, or via photographs or videos taken by us or our representatives when you attend events at our premises;
  - (h) when you are contacted by, and respond to, our marketing representatives and customer service officers;
  - (i) when we receive references from business partners and third parties, for example, where you have been referred by them;
  - (j) when you fill up surveys administered by our third party surveying service providers;
  - (k) when we seek information from third parties about you in connection with the products and services you have applied for; and/or
  - (l) when you submit your Personal Data to us for any other reason.
- 2.2. When you browse our websites, you generally do so anonymously but please see the section below on cookies. We do not, at our websites, automatically collect Personal Data unless you provide such information or login with your account credentials.
- 2.3. 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 and warrant to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
- 2.4. 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 products and services you have requested.

### 3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

- 3.1. **Generally**, DOT collects, uses and discloses your Personal Data for the following purposes:
- (a) outreach in relation to our programmes and services;
  - (b) responding to your queries, feedback, complaints and requests;
  - (c) verifying your identity;



- (d) managing the administrative and operations of DOT and complying with internal policies and procedures;
- (e) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (f) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to review, develop and improve the quality of our programs and services;
- (g) monitoring or recording phone calls and face-to-face interactions for quality assurance, employee and volunteer training and performance evaluation and identity verification purposes;
- (h) in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
- (i) conducting investigations relating to disputes, billing or fraud;
- (j) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on DOT (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations);
- (k) if you are an existing or prospective participant (including an invited speaker or trainer) of our courses, events and programmes:
  - (i) assessing and processing any applications or requests made by you for any courses, events and programmes offered by us;
  - (ii) creating and maintaining your profile in our system database for internal records and reference;
  - (iii) providing customer service and support;
  - (iv) administering debt recovery and debt management;
  - (v) facilitating your use of our online portals;
  - (vi) taking photograph(s) and/or video(s) of you for (i) internal dissemination within DOT; and (ii) generating publicity materials for our courses, events and programmes;
  - (vii) facilitating and providing opportunities for networking between yourself and other existing or prospective participants (including invited speakers or trainers) of our courses, events and programmes; and/or
- (l) any other purpose reasonably related to the above.

3.2. In addition to the purposes listed at paragraph 3.1 above, DOT collects, uses and discloses your Personal Data for the following purposes:



- (a) If you are an existing or prospective participant (including an invited speaker or trainer) of DOT's courses, events and programmes:
  - (i) administering and conducting information sessions, courses, events and programmes (including facilitating registration, recording attendance, processing payment for courses, conducting tests and examinations, event budgeting and contacting you for administrative purposes);
  - (ii) facilitating your applications to other educational or training institutions which you may apply to;
  - (iii) maintaining an alumni network and organising alumni activities such as information sessions and talks;
  - (iv) registering you on member, beneficiary and/or volunteer lists;
  - (v) administering continuing professional development points; and/or
  - (vi) any other purpose reasonably related to the aforesaid.
  
- 3.3. Furthermore, where permitted under the Act and/or where you have provided your consent to DOT separately, DOT may also collect, use and disclose your Personal Data for the following additional purposes:
  - (a) providing or marketing services, programs and benefits to you, including but not limited to special events from DOT;
  - (b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of programs and services by DOT;
  - (c) administering and organising contests, lucky draws, promotional events, competitions and marketing campaigns, and personalising your experience at DOT's outreach events and touchpoints;
  - (d) conducting market research, analytics and surveys to enable DOT and our authorised partners to understand and determine customer preferences and demographics for us to offer you programs and services as well as special opportunities and marketing programmes which may be relevant to your preferences and profile; and/or
  - (e) any other purpose reasonably related to the aforesaid.
  
- 3.4. If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, DOT may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.
  
- 3.5. In relation to particular products and services or in your interactions with DOT, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.



#### **4. Disclosure of Personal Data**

4.1. DOT will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed by DOT, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:

- (a) authorised partners of DOT;
- (b) companies providing support services to DOT, our women and our volunteer community
- (c) agents, contractors or third party service providers who provide operational services to DOT, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security, employee recognition or other services to DOT;
- (d) agents, contractors or third party service providers (including but not limited to external trainers) who provide services in connection with the courses, programmes and events organised, conducted and administered by DOT;
- (e) our partners or collaborators in our courses, events and programmes;
- (f) our professional advisers such as consultants, auditors and lawyers;
- (g) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority;
- (h) other existing or prospective participants (including invited speakers or trainers) of our courses, events and programmes; and
- (i) any other party whom you authorise us to disclose your Personal Data to.

#### **5. Use of Cookies**

5.1. A cookie is information that is placed on your computer when you visit certain websites. The cookies placed by our servers are readable only by us, and cookies cannot access, read or modify any other data on an electronic device, nor does it capture any data which allows us to identify you individually. All web-browsers offer the option to refuse any cookie. Should you choose to refuse our cookies, we would not be able to gather any information from you.

5.2. Should you wish to disable the cookies associated with these technologies, you may do so by changing the settings on your browser. However, in doing so, you may not be able to access certain part(s) of our website.

#### **6. Data Security**

6.1. DOT will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that no harmful code (such as viruses, bugs, trojan



horses, spyware or adware) will infect our websites. You should be aware of the risks associated with using websites.

- 6.2. While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet or when you use our online portals, and we urge you to take every precaution to protect your Personal Data when you are on the Internet. We recommend that you change your passwords often, use a combination of letters and numbers, and ensure that you use a secure browser.
- 6.3. If applicable, you undertake to keep your username and password secure and confidential and shall not disclose or permit it to be disclosed to any unauthorised person, and to inform us as soon as reasonably practicable if you know or suspect that someone else knows your username and password or believe the confidentiality of your username and password has been lost, stolen or compromised in any way or that actual or possible unauthorised transactions have taken place. We are not liable for any damages resulting from any security breaches, or unauthorised and/or fraudulent use of your username and password.

## 7. **Contacting Us – Feedback, Withdrawal of Consent, Access and Correction of your Personal Data**

7.1. If you:

- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records,

you can contact our Data Protection Officer via [Empower@DaughtersOfTomorrow.org](mailto:Empower@DaughtersOfTomorrow.org).

7.2. If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, DOT may not be in a position to administer any contractual relationship in place, which in turn may also result in the termination of any agreements with DOT, and your being in breach of your contractual obligations or undertakings. DOT's legal rights and remedies in such event are expressly reserved.

## 8. **Governing Law**

8.1. This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.