

The Chartered Institute
of Logistics & Transport
Singapore
Personal Data Protection
Policy

TABLE OF CONTENTS

Contents	Page
1. Introduction.....	1
2. General	2
3. Do Not Call Registry.....	2
4. Personal Data Protection.....	3

1. Introduction

The Chartered Institute of Logistics & Transport Singapore (“**CILTS**”) is committed to act responsibly with regard to the personal data that it holds within its various systems. Personal data refers to data about an individual who can be identified as a result of that data. Personal data includes employees, members and customers data. Our members and customers’ personal data contains important, personal information of our members and customers and it is CILTS’ responsibility to develop appropriate policies to prevent abuse.

This Policy is designed to provide information on the activities which involve the collection, use, disclosure, storage, and retention of personal data. It is in compliance with the Personal Data Protection Act 2012.

This Policy consists of two key parts:

(1) Do Not Call Registry: This part sets out CILTS’ policy on the sending of telemarketing calls, text messages, or faxes addressed to Singapore telephone numbers.

(2) Personal Data Protection: This part sets out CILTS’ policy in relation to an individual’s personal data.

This Policy applies to all employees, members and customers. Also, any entity that performs services for or on behalf of CILTS, including vendors, contractors, co-brand partners and agents are expected to comply with this Policy.

2. General

2.1 The Personal Data Protection Act 2012 (“**PDPA**”) establishes in Singapore a new overarching regime for the protection of personal data and seeks to ensure that organisations comply with a baseline standard of protection for the personal data of individuals.

2.2 This Policy consists of two key parts:

2.2.1 **Do Not Call Registry:** This sets out CILTS’ policy on the sending of telemarketing calls, text messages, or faxes addressed to Singapore telephone numbers. To regulate telemarketing, Singapore has established a Do Not Call Registry for individuals to opt out from receiving certain types of marketing messages.

2.2.2 **Personal Data Protection:** This sets out CILTS’ policy in relation to an individual’s “**personal data**”, i.e. data, whether true or not, about an individual who can be identified from that data or other accessible information. The protection covers personal data stored in electronic or non-electronic form. Personal data can include member, customer, employee or statistical usage data.

2.3 **CILTS’ approach to compliance with the PDPA:** This Policy sets forth the approach of CILTS to achieving compliance with the PDPA.

2.3.1 Employees should read, understand and comply with all the provisions of this Policy and any other guidelines on personal data.

2.3.2 All employees are expected to treat and handle personal data sensitively and respectfully, and also to comply fully with this Policy and the law.

2.3.3 Failure to comply with this Policy may result in penalties and fines imposed by the law, as well as disciplinary measures imposed by CILTS.

2.4 **Updates to this Policy:** This Policy will be updated periodically. Employees are expected to always remain fully updated on this Policy.

2.5 **CILTS Data Protection Officer:** for queries regarding the Policy, the CILTS Data Protection Officer may be contacted at the following:

Executive Director: tel. 62750233

3. Do Not Call Registry

3.1 **DNC Registry:** The PDPA establishes a system whereby individuals may register their Singapore telephone numbers with a national Do Not Call (“**DNC**”) Registry to indicate that they do not wish to receive certain types of telemarketing messages (“**Marketing Messages**”) at those telephone numbers. Organisations must not send Marketing Messages to numbers which are listed on the relevant DNC Register (e.g., must not send a telemarketing SMS to a number listed on the No Text Message Register).

3.2 No Marketing Messages: CILTS generally does not allow employees to send Marketing Messages unless officially authorised by CILTS Board or Executive Director.

3.3 Marketing Messages: Before contacting a Singapore telephone number to offer any product or service, consider if the message is a Marketing Message. Marketing Messages include messages which are:

3.3.1 advertising CILTS' courses, membership, educational visits and study tours;

3.3.2 advertising partners' offer/services;

3.3.3 inviting the members to a CILTS' event;

3.3.4 inviting the members to visit CILTS' website.

3.4 Not Marketing Messages: Marketing Messages do not include:

3.4.1 business-to-business marketing messages;

3.4.2 any message that is solely intended to notify members of their membership status;

3.4.3 any message that is only to conduct market research or market survey; or

3.4.4 if an employee contacts a customer only to respond to a query or complaint by that customer, that follow-up call is not a Marketing Message.

4. Personal Data Protection

4.1 Employees to comply: Employees who may handle, receive, collect, use, disclose or transfer any personal data (which may include member, customer, employee or statistical usage data) must comply with the obligations in the PDPA. Employees in certain job functions may have additional personal data guidelines which apply to them. These employees must follow these additional personal data guidelines as prescribed from time to time.

4.2 PDPA obligations: The PDPA imposes the following key obligations to protect personal data:

4.2.1 Personal data must be collected, used or disclosed only for purposes which would be considered appropriate by a reasonable person in the circumstances.

4.2.2 Individuals must be notified of the purposes for the collection, use or disclosure of their personal data, prior to such collection, use or disclosure.

4.2.3 The consent of the relevant individual must be obtained for any collection, use or disclosure of their personal data, unless exceptions apply. CILTS must allow the withdrawal of consent which has been given or deemed to be given.

- 4.2.4 When requested, CILTS must provide individuals relevant information in connection with their personal data and the collection, use and disclosure thereof; and the right to access and correct their personal data.
- 4.2.5 CILTS must use reasonable efforts to ensure that personal data is accurate and complete if such data is used to make a decision affecting the individual or if such data will be disclosed to another organisation.
- 4.2.6 CILTS must implement reasonable security arrangements for personal data.
- 4.2.7 CILTS must not keep personal data for longer than it is necessary to fulfil: (i) the purposes for which it was collected; or (ii) a legal or business purpose.
- 4.2.8 Personal data shall be transferred outside Singapore only where the standard of protection provided to such personal data is comparable to the protection under the PDPA.

4.3 External requests: CILTS may receive external queries or requests relating to personal data at different touch points. Depending on the type of query or request, authorised employees may be able to deal with the requests or if necessary, escalate the external request relating to personal data (e.g. queries, complaints, withdrawal of consent, access and correction requests from the public) to management. There are serious penalties for failure to comply. If in doubt, please contact the CILTS Data Protection Officer.