

MCST 2916 SANCTUARY GREEN CONDOMINIUM

Personal Data Protection Policy

Sanctuary Green Management Corporation does, from time to time, require collection of Personal Data in order to provide services to Residents and Subsidiary Proprietors, and to comply with obligations pursuant to laws of the Republic of Singapore. The Management Corporation is committed to protecting and respecting privacy of your Personal Data.

This policy statement sets out the basis on which we will collect, handle, process and store any Personal Data we collect from you, or that you provide to us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

DEFINITION OF TERMS

“BMSM Act”	The Building Maintenance and Strata Management Act of the Republic of Singapore;
“MCST” or “Management Corporation”	Management Corporation for Strata Title 2916, Sanctuary Green and shall include the Management Council and the Managing Agent
“Management Council”	The Management Council elected by Subsidiary Proprietors of Sanctuary Green
“Managing Agent”	The agent appointed by the MSCT to administer services to residents under the BMSM Act;
“Personal Data”	Data, whether in physical or electronic form, that may reasonably lead to the identification of you as an individual;
“Resident”	A person who is a lawful resident of Sanctuary Green, whether as an owner of a unit, or a tenant;
“Subsidiary Proprietor”	The owner of a unit in Sanctuary Green
“We”, “Our” and “Us”	the Management Corporation, and shall include the Management Council and the Managing Agent

COLLECTION AND PROCESSING OF PERSONAL DATA

You can use and browse our website and have contact with Us without disclosing your personal data, except as may be necessary to allow Us to respond to your requests or in cases where you contact us directly.

We collect Personal Data only:

- Where required by law;
- To allow Us to provide services to you (including but not limited to, car parking access, facilities access, services by vendors on behalf of the MCST), as a subsidiary proprietor or resident; and/or
- When you provide it to Us, through registration, completion of forms, emails, inquiries and requests, and similar situations in which you have chosen to provide the information to Us.

We will retain control of, and responsibility for, the use of any personal data you disclose to Us. Such data shall remain in our possession, or that of data intermediaries acting on our behalf.

PURPOSES OF USE

All Personal Data and other information collected may be used by Us, and may be combined with other information, for the following purposes:

- To keep records as required by the BSM Act and other laws of the Republic of Singapore;
- To provide services to you in accordance with the by-laws of the MSCT and/or rules, procedures and processes approved from time to time by the Management Council;
- To respond to queries, complaints or issues that you may raise with Us, and to take follow-up action relevant to that query, complaint or issue;
- To perform office, operational and/or administrative matters pertaining to your request; and/or
- To seek feedback and comments on our business and operational matters.

IP ADDRESSES

When you use our website, We may collect and store information about your computer (including your IP address, operating system and browser type) for system administration. This is statistical data about our users' browsing actions and patterns. This data could possibly lead to your identification, but We, and our data intermediaries, do not use it to do so unless required by law.

COOKIES

Our website may use cookies to distinguish you from other users of Our website. This assists the website to increase efficiency when you browse it and also allows Us to improve our website.

THIRD PARTY WEBSITES

Our website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

DISCLOSURE OF YOUR PERSONAL DATA

To respond to or process your request to the MCST, We may have to disclose your personal data to any member MCST, or to third parties, such as our service providers and professional advisors.

Notwithstanding anything contained in this policy statement, your Personal Data may be disclosed to a Government Agency in accordance with the provisions of the BSM Act, or in compliance with a request made pursuant to statutory requirement, subpoena, warrant or other judicial order.

Your Personal Data may be disclosed in any manner reasonable to any relevant party where it is considered that, failing to do so, may jeopardise the immediate health and safety of you or any other person, or the safety and integrity of the structures and property administered by the Management Corporation.

Your personal data will not be disclosed on to any further parties, unless We have obtained your consent or are legally required to do so.

WHERE WE STORE YOUR PERSONAL DATA

Data that We collect from you, including but not limited to Personal Data, shall be stored in Singapore, however, from time to time, data that We collect from you may be transferred to, and stored at, a destination outside Singapore. It may also be processed by staff operating outside Singapore who work for us or for one of our service providers.

By submitting your personal data, you agree to this transfer, storing and/or processing. The Management Corporation will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement.

SECURITY

We use physical, technical and organisational security precautions to protect your data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risk. Our security procedures are reviewed from time to time to ensure adequacy and maintenance, especially with respect to technology updates.

DATA RETENTION

We retain Personal Data for as long as necessary for the fulfilment of the purposes for which it was collected, or to which you have given your consent, except where otherwise provided by law.

RIGHT TO WITHDRAW CONSENT, REQUEST ACCESS TO, AND CORRECTION OF PERSONAL DATA

You have the right to withdraw consent, request access to, and correct Personal Data that the Management Corporation holds about you, in accordance with applicable laws, except where, by doing so, the MCST will not be able to comply with its obligations under the BSM Act and other relevant Singapore laws.

If you withdraw consent for the Management Corporation to hold Personal Data about you, you are acknowledging that the MCST may not be able to provide services to you that reasonably require your identity or other personal information (eg address and residency status) in order to fulfil those service obligations. In such instances, you agree that you will not hold the MCST liable for its failure to provide services or respond to your queries.

All requests for the withdrawal of consent, access to, or correction of Personal Data held by the Management Corporation shall be made in writing to the MCST via post at:

The Secretary
MCST 2916 Sanctuary Green
189 Tanjong Rhu Road
#01-01 Sanctuary Green
Singapore 436926

Attention: Data Protection Officer

CONTACT

Questions, comments and requests regarding this Privacy Statement should be addressed to the Managing Agent, MCST 2916 Sanctuary Green, at sg_mgt@sanctuarygreen.com.sg.

By Order

Management Council
Management Corporation Strata Title 2916 Sanctuary Green
Singapore
September 2014