



THE PARSI ZOROASTRIAN ASSOCIATION OF SOUTH EAST ASIA

83 Desker Road, Singapore 209606

Email: pzas.singapore@gmail.com

Privacy Statement - Parsi Zoroastrian Association of South East Asia (PZAS)

Terms and Conditions

I. Policy

Parsi Zoroastrian Association of South East Asia (the "Association" or "we") are committed to protecting the data privacy of members in accordance with Applicable Law. This PZAS Privacy Statement ("Privacy Statement") describes how the Association collects, uses, transfers, stores and safeguards the Personal Data of Members of the Association. You will find all of the definitions for the capitalized terms in Section IV below.

II. Purpose and Scope

This Privacy Statement documents the Association's privacy and data protection practices for the Personal Data of members. This Privacy Statement applies to all Members of the Association and their families based in Singapore. While this Privacy Statement explains how the Association treats Personal Data, we may also share or use your Personal Data in accordance with your separate instructions or consent, and to the extent allowed under Applicable Law.

1. Personal Data

What is Personal Data?

As defined in the Glossary (view below), "Personal Data" means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly. We describe below what this means and what categories of Personal Data PZAS collects about our Members in the course of your membership. In a nutshell, your Personal Data relates notably to your contact address, identity details, telephone / mobile details and your social NRIC details.

Does the format of the Personal Data matter?

This Privacy Statement applies to Personal Data in any medium or format that we obtain about you as a Member, whether we obtained it directly or indirectly, manually or automatically, or otherwise through applications and any other information from any of these sources to the extent it is combined with, or associated with Personal Data about you. An image of an identifiable individual captured in a photograph or video recording is personal data about that individual.

How long does PZAS keep my Personal Data?

We use your Personal Data for as long as you remain a member of the Association at and where the retention of your Personal Data is necessary to meet legal requirements in accordance with Applicable Law. Personal data will be removed by PZAS, within a reasonable period after you cease to be a member of the organization or upon specific written request by the member.

2. Collection & Use

Why does PZAS collect my Personal Data?

As an Association, we collect and maintain Personal Data that you provide via your Membership application for a variety of purposes. In addition, image of an identifiable individual captured in a photograph or video recording is personal data of that individual collected by PZAS at its events / gatherings, for distribution on its website, WhatsApp groups or Social Media.



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How does PZAS use my Personal Data?

The verification of your Membership application for membership of the Association, by way of example:

- To ascertain that you meet the requirements of the type of membership applied for and to confirm the right to membership, amongst others.

PZAS takes photographs / videos at its events / gatherings and may share these on its website or Social Media. These are purely for broadcasting the Associations activities and events.

The compliance with a legal obligation to which PZAS is subject, by way of example:

- To comply with statutory, financial and legal obligations including audits, reports and statistics.

3. Legal Basis

What is the legal basis for processing my Personal Data?

For Members applying for membership of the Association, your Personal Data is processed as per the local and Applicable Laws on data protection in Singapore.

With regard to the above-mentioned legal basis, please refer to Section 2 which provides you with categories of data processing and illustrations.

4. Transfer and sharing

Member Personal Data may be stored in hard and electronic format in Singapore.

Are my data transferred and shared?

- Transfer and sharing among PZAS Members:
Personal Data may be shared in the normal course and scope of business with other Members to the extent necessary and as permitted to facilitate the Members Directory, with safeguards. NRIC details will not be shared with other members.
- Transfers and sharing with third-party

Personal Data will not be shared with any third-party with the exception of:

- Photographs taken at PZAS events / gatherings and write ups of the events / gatherings, being shared /put up on the PZAS website (www.pzas.org) or its social media page on other social media sites. Permission of the members is being taken in order to facilitate the uses described above.
- In the future if any data needs to be provided to any Third Party Service Provider, all contracts with Service Providers must contain minimum contractual safeguards, as defined or required by Applicable Law and PZAS Policies.
- The Association may also share Personal Data with law enforcement, regulatory authorities or other third parties in cases where it is necessary to protect the Association's legitimate interests (including for example, to prevent imminent physical harm, financial loss, or to report suspected illegal activity) as required and if permitted by Applicable Law.



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5. Your Data Protection rights (Access, rectification, erasure, blocking)

What are my rights?

You have the right to obtain from PZAS confirmation as to whether or not Personal Data concerning you are being processed, and, where that is the case, access to the Personal Data and the information relating to such processing.

You have the right to obtain from the Data Controller without undue delay the rectification of inaccurate Personal Data concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement. You also have the right to obtain from the Data controller the erasure of Personal Data concerning you without undue delay and the Data controller shall have the obligation to erase Personal Data without undue delay where, for instance, one of the following grounds applies:

- (a) The Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (b) The data subject withdraws consent.

You have the right to obtain from the Data controller restriction of processing where for instance the accuracy of the Personal Data is contested by you. You have the right to receive your Personal Data in a structured, commonly used and machine-readable format. You have the right to object at any time to processing of Personal Data concerning you.

You have the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy in cases where the Data controller does not take action on your request.

Note that you have the ability to directly access and modify much if not all of your Personal Data through Association Systems. Upon your request, we will try to accommodate requests to remove Personal Data unless retention of Personal Data is required by Applicable Law or necessary to defend the Association against legal claims.

How does a member withdraw consent?

You have the right to withdraw consent provided by yourself at any time by doing so specifically, in writing or email (PZAS.Singapore@gmail.com) addressed to the Data Protection Officer, Parsi Zoroastrian Association of South East Asia, Singapore. The Data Protection Officer, PZAS will ensure that this withdrawal of consent is acted on within one month of receipt of your message.

6. Protection

The Association uses physical, technical and organizational security controls commensurate with the amount and sensitivity of the Personal Data to prevent unauthorized processing, including but not limited to, unauthorized access to, acquisition and use of, loss, destruction, or damage to Personal Data, and to protect the data's integrity. Where appropriate, the Association uses encryption, access controls, standards and other procedures to protect Personal Data from unauthorized access. Physical and logical access to electronic and hard copy files is further restricted based upon job responsibilities and business needs, and only individuals with a legitimate business need to know the Personal Data, and for legitimate business purposes, are authorized to access it.

The Data Protection Officer (and Data Controller) for PZAS shall be appointed by the Managing Committee of the Association.

7. Questions



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Who can I contact if I want to know more about this Statement, the process to access Association data, the processing of Personal Data or my rights, etc?

If you have any questions about this Privacy Statement, or the collection, access, use, disclosure, sharing or safeguarding of Personal Data, or your Personal Data you may contact PZAS Data Protection Officer at pzas.singapore@gmail.com. The Managing Committee of PZAS will decide in what cases / circumstances, data can be provided and to what extent.

III. Glossary

"Applicable Law" means applicable laws, rules and/or regulations.

"Member" means any person applying to become a member of PZAS, post payment of the membership dues.

"Member Personal Data" means Personal Data relating to a Member of the Association.

"Data controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

"Data processor" means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data controller;

"Association Devices" means all electronic devices, systems and software applications provided to you by the Association for business use.

"Legitimate interest" means the Association's interests or the interests of third parties, and commercial interests as well as wider societal benefits. Legitimate interest is analyzed through a) a Purpose test: are you pursuing a legitimate interest, b) a Necessity test: is the processing necessary for that purpose and c) a Balancing test: do the individual's interests override the legitimate interest.

"Personal Data" means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

"Sensitive Personal Data" means Personal Data revealing racial or ethnic origin, or information concerning NRIC details.

"Service Provider" means any entity under contract with a PZAS Group Member which processes Personal Data on behalf of a PZAS. Service Providers also may be referred to as Data Processors.



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Consent form – PZAS Privacy Statement

I have read the Privacy Statement of the Parsi Zoroastrian Association of South East Asia (PZAS) which has been provided to me and is available for viewing on www.pzas.org.

I am agreeable to providing my consent for the following:

1. Personal Data of me/us (and my/our family) being collected / used / disclosed by PZAS
2. Personal Data of me/us (and my/our family) being shared in the normal course and scope of business with other Members, in form of a directory, or when included in any social media groups
3. Photographs of me/us and my/our family taken at PZAS events / gatherings and write ups of the events / gatherings, being shared /put up on the PZAS website (www.pzas.org) or its social media page or on other social media.
4. The Association may also share Personal Data with law enforcement, regulatory authorities or other third parties in cases where it is necessary to protect the Association’s legitimate interests.

Please tick only 1 of the above boxes.

- Yes**, I/we have **read** and **consent** to the terms and conditions mentioned in this document and the PZAS Privacy Statement for me/us and my/our family
- Yes**, I/we have **read** and **consent** to the terms and conditions mentioned in this document and the PZAS Privacy Statement only for the undersigned, but
No, do not consent to the same for my/our family (including our children)
- No**, I have read the terms and conditions mentioned in this document and the PZAS Privacy Statement and **do not consent** for myself or for my family

If I/we tick on the second or third box above, I/we take up the responsibility of ensuring that the applicable persons **not consenting** will desist from appearing in any group photographs taken during the PZAS meetings and functions, and If I/we or my/our family do appear in these group pictures then I/we consent to my/our and my/our family pictures being included as part of the group pictures.

Signature:

Name:
(as per NRIC)

Date:

Signature:

Name:
(as per NRIC)
