

CARES

Data Protection Policy

1. Purpose and scope

- 1.1 The purpose of this policy is to ensure compliance with the Singapore Personal Data Protection Act (PDPA) and equivalent UK, EU and other national legislation where applicable to activities in CARES ('data protection law'). Data protection law governs the collection, use and disclosure of personal data about identifiable individuals (living or deceased) by organisations.
- 1.2 This policy applies to Cambridge Centre for Advanced Research and Education in Singapore Ltd (CARES). It does not apply to University of Cambridge or any other partners of CARES, which are separate legal entities and data controllers. CARES is incorporated under Singapore Governing Law and therefore the primary data protection legislator for CARES is the PDPC Singapore.
- 1.3 This policy applies to all staff except when acting in a private or domestic capacity. In this policy, the term 'staff' means anyone working in any context within CARES at whatever level or grade and whether permanent, fixed term or temporary, including but not limited to employees, other visiting research or teaching staff, workers, trainees, interns, seconded staff, agency staff, agents, volunteers, and external members of committees. Staff who have a secondary affiliation with another organisation will be governed by this policy only when acting on behalf of CARES; in a non-CARES context the policy of the relevant affiliated organisation should be referred to.
- 1.4 This policy applies to all students when processing personal data on behalf of CARES, but not in any other situation including when acting in a private, domestic or non-CARES capacity.
- 1.5 This policy is not, and should not be confused with, a privacy or consent notice (a statement informing data subjects how their personal data is used by CARES).
- 1.6 This policy should be read in conjunction with the obligations in the following documents, which supplement this policy where applicable:
 - 1.6.1 staff employment contracts and comparable documents which impose confidentiality obligations in respect of information held by CARES;
 - 1.6.2 information security policies, procedures and terms and conditions, which concern the confidentiality, integrity and availability of CARES information, and which include rules about acceptable use, breach reporting, IT monitoring, and the use of personal mobile devices
 - 1.6.3 records management policies and guidance, which govern the appropriate retention and destruction of CARES information; and
 - 1.6.4 any other contractual obligations on CARES or individual staff which impose confidentiality or data management obligations in respect of information held by CARES, which may at times exceed the obligations of this and/or other policies in specific ways (e.g. in relation to storage or security requirements for funded research).

2 Policy statement

- 2.1 CARES is committed to complying with data protection law as part of everyday working practices.
- 2.2 Complying with data protection law may be summarised as but is not limited to:
 - 2.2.1 complying with the data protection provisions on collection, use, disclosure and care of personal data: consent, purpose, notification, protection, accuracy, retention and transfers
 - 2.2.2 complying with the data protection provisions on the rights of individuals to access and correct their personal data and
 - 2.2.3 understanding, and implementing as necessary, CARES' openness and accountability obligations under data protection law.
- 3 Roles and responsibilities**
 - 3.1 CARES has a corporate responsibility with respect to activities relating to the collection, use and disclosure of personal data:
 - 3.1.1 complying with data protection law and holding records demonstrating this;
 - 3.1.2 cooperating with the Personal Data Protection Commission Singapore (PDPC)
 - 3.1.3 responding to regulatory/court action and paying administrative levies and fines issued by the PDPC.
 - 3.2 CARES Governing Board is responsible for:
 - 3.2.1 reviewing (at least once every three years) and approving this policy; and
 - 3.2.2 assessing the overall risk profile and ensuring appropriate resources and processes are in place and implemented to enable compliance with data protection law.
 - 3.3 The CARES Data Protection Officer is responsible for:
 - 3.3.1 ensuring appropriate policies and procedures are in use in CARES for compliance with data protection law and are communicated to staff, students and stakeholders ;
 - 3.3.2 fostering a data protection culture in CARES;
 - 3.3.3 acting as CARES's standard point of contact with the PDPC on data protection matters;
 - 3.3.4 managing data protection-related queries and complaints; and

- 3.3.5 reporting annually to the CARES Governing Board on personal data risk in CARES.
- 3.4 With support from the Data Protection Officer, the CARES Director is responsible for:
 - 3.4.1 making all staff within CARES aware of this policy as necessary;
 - 3.4.2 ensuring that appropriate processes and training are implemented within CARES to enable compliance with data protection law; and
 - 3.4.3 ensuring that appropriate processes are implemented within CARES to enable information assets containing personal data to be included in CARES's Information Asset Register.
- 3.5 Individual staff, as appropriate for their role and in order to enable CARES to comply with data protection law, are responsible for:
 - 3.5.1 completing relevant data protection training;
 - 3.5.2 following relevant advice, guidance and tools/methods provided by CARES, regardless of whether access to and processing of personal data is through CARES-owned and managed systems, or through their own or a third party's systems and devices;
 - 3.5.3 when processing personal data on behalf of CARES, only using it as necessary for their contractual duties and/or other CARES roles and not disclosing it unnecessarily or inappropriately;
 - 3.5.4 recognising, reporting internally, and cooperating with any remedial work arising from personal data breaches;
 - 3.5.5 recognising, reporting internally, and cooperating with the fulfilment of access and correction requests;
 - 3.5.6 when engaging with students who are using personal data in their studies and research, advising those students of relevant advice, guidance and tools/methods to enable them to handle such personal data in accordance with this policy; and
 - 3.5.7 only deleting, copying or removing personal data when leaving CARES as agreed with the CARES Director (with advice from the Data Protection Officer) and as appropriate.
- 3.6 The responsibilities in paragraph 3.6 apply to individual students when processing personal data on behalf of CARES.
- 3.7 Non-observance of the responsibilities in paragraph 3.6 may result in disciplinary action.

- 3.8 The roles and responsibilities in paragraphs 3.1 to 3.8 do not waive any personal liability for individual criminal offences for the wilful misuse of personal data under data protection law.

4 Contact and date of last revision

- 4.1 Contact details are published on the CARES webpage.
- 4.2 This policy was last approved by CARES Governing Board 27th November 2019.