

## **Personal Data Protection Policy**

This Personal Data Protection Policy describes and explains the purposes for which and the manner in which Trailblazer Foundation Ltd (“**Trailblazer**” or as appropriate in the context, “**we**”, “**us**” or “**our**”) collects, uses, discloses, transfers and processes Personal Data of individuals in the course of our operations and operating, administering and managing our projects, funds and sponsorships.

“**Personal Data**” in this Policy means data that can identify an individual.

### **1. Personal Data that we collect**

The types of Personal Data that we collect about individuals may include:

- (i) Name
- (ii) NRIC number, FIN number, passport number
- (iii) Image of thumbprint
- (iv) Photograph or video image
- (v) Date of birth
- (vi) Gender
- (vii) Marital status
- (viii) Names of spouse, children and relatives
- (ix) Race
- (x) Country of birth / nationality
- (xi) Signature (specimen or electronic signature)
- (xii) Telephone numbers
- (xiii) Facsimile numbers
- (xiv) Email addresses
- (xv) Residential, office and mailing address
- (xvi) Bank account number
- (xvii) Occupation and salary
- (xviii) Education history
- (xix) Employment history

You may have provided the Personal Data to us personally. You may also have authorised other individuals or organisations to provide the Personal Data to us and consented to our collection of your Personal Data from these individuals. These individuals may include your employees, subordinates, colleagues and your family members.

### **2. Purposes for which we collect and use Personal Data**

The purposes for which we collect and use Personal Data are:

- (i) To evaluate and process applications for sponsorships submitted by individuals or organisations;
- (ii) To provide sponsorship to individuals or organisations;

- (iii) To communicate with sponsored individuals and organisations in relation to or in the course of our provision of sponsorships;
- (iv) To receive and process donations from donors;
- (v) To communicate with donors concerning Trailblazer's projects, funds and sponsorships;
- (vi) To operate, administer and manage Trailblazer's projects, funds and sponsorships;
- (vii) To evaluate Trailblazer's projects, funds and sponsorships;
- (viii) To respond to your enquiries, your requests for information or feedback that you submit through our website or through other means; and
- (ix) For administrative and management purposes related to the above.

We only collect and use Personal Data for purposes for which you have consented to. If we need to use your Personal Data for any purpose to which you have not previously consented to, we will seek your consent prior to using your Personal Data for the new purpose.

### **3. Disclosure, sharing and transfer of Personal Data**

In the course of or in connection with our operations and operating, administering and managing our projects, funds and sponsorships, we do disclose, share and transfer Personal Data to the following parties for the following purposes:

- (i) To our agents and sub-contractors for the purposes of operating, running, managing and administering Trailblazer's projects and funds;
- (ii) To our partner organisations for the purposes of operating, running, managing and administering Trailblazer's projects, funds and sponsorships;
- (iii) To the banks for the purposes of arranging for payment or the transfer of funds;
- (iv) To government or non-government authorities, agencies and/or regulators as required under law or under directions or orders from the government or non-government authorities, agencies and/or regulators.

We also disclose, share and transfer Personal Data to the following parties for the purposes of managing, administering and running our operations and for our business and legal purposes:

- (v) To our service providers (who may be located outside Singapore) that have been retained to perform services on our behalf or on behalf of our affiliates, including:
  - a. Service providers who provide IT and outsourcing services such as data storage, electronic mail services and deployment of management operations for information technology
  - b. Professional and legal advisors;
  - c. Vendors, service providers and consultants that have been engaged to help manage, operate, administer and run Trailblazer's operations or provide services to us to facilitate our operation, administration and management of Trailblazer's projects, funds and sponsorships;
  - d. External contractors to provide advisory, consultancy and evaluative services to Trailblazer, or organise events for Trailblazer.

Trailblazer requires that our service providers implement adequate levels of protection in order to protect Personal Data. We also require that our service providers only process Personal Data strictly for purposes for which we engage them for and consistent with the purposes that we have described in the section “Purposes for which we collect and use Personal Data” or with other purposes for which your consent has been sought and obtained.

In addition, we would disclose Personal Data in the following circumstances:

- (i) we are required to do so by law;
- (ii) in response to a request from law enforcement authorities or other government officials;
- (iii) to comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and
- (iv) where the disclosure is necessary for investigations or legal proceedings.

#### **4. Protection and Security of Personal Data**

We employ a range of technological and physical security arrangements and maintain safeguards to protect against the accidental or unauthorized access, collection, use, disclosure, copying, modification, disposal, deletion and other similar risks to Personal Data.

#### **5. Retention of your Personal Information**

Trailblazer only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than 5 years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless otherwise informed or otherwise required by law or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations.

#### **6. How to Contact Us**

If you have any questions or comments about this Policy and our policies and practices on our collection, use, disclosure or retention of Personal Data, you may contact our Data Protection Officer by emailing us at [DPO@trailblazerfoundation.org.sg](mailto:DPO@trailblazerfoundation.org.sg)

#### **7. Access and Correction of Personal Data**

You may request for information from Trailblazer on what Personal Data of yours we have and how we have used and shared your Personal Data during the last one year before the date of your request.

Please submit your requests in writing by email to our Data Protection Officer at the contact details listed in Section 6 above. There is an administrative fee to cover our administrative costs in preparing a response to your request. We will inform you of the administrative fee upon our receipt and review of your request. We would appreciate it if you could make payment of the administrative

fee by way of a cheque made payable to “Trailblazer Foundation Ltd”. Once we receive payment of the administrative fee, we will endeavour to respond to your request within 30 days. If we require more time to respond to your request, we will let you know.

If there is a change or an update in your Personal Data or if there is a need to correct any Personal Data of yours that we have, please email us and provide us with the following details:

- Your name and an email-address or mailing address at which we can contact you.
- The personal information for which there has been a change, update or correction.

As it is important to us that the Personal Data that we have about you is accurate and complete, it may be necessary for us to request for supporting documentation from you to facilitate our updating and correction of your Personal Data. We will contact you if we require supporting documentation from you.

There may be circumstances where we will not update or correct Personal Data:

- (i) The personal information is opinion data that is kept solely for an evaluative purpose;
- (ii) Documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

## **8. Withdrawal of Consent**

You may also choose to withdraw your consent to Trailblazer’s use, collection, sharing or processing of your Personal Data at any time.

If you wish to withdraw your consent, please notify us in writing by email to our Data Protection Officer at the contact details listed in Section 6 above with the following details:

- Your name and an email-address or mailing address at which we can contact you.
- The nature of our relationship with you.
- The purposes for which you would like to withdraw consent to Trailblazer’s use, sharing or processing of your Personal Data.

Please understand that your withdrawal of your consent to our use of your Personal Data may affect our provision of sponsorship and/or assistance to you, depending on the nature of your relationship with us and may have practical and/or legal consequences. We will inform you of these consequences at the time when we receive your request to withdraw your consent.

## **9. Feedback and Complaints**

If you have any concerns, feedback or complaints about the manner in which Trailblazer has collected, used, disclosed or processed your Personal Data, you may write to our Data Protection Officer at the contact details listed in Section 6 above. Please provide us with the following details as this would assist us to review and investigate your feedback or complaint internally and enable us to provide you with a response:

- Please indicate the nature of our relationship with you.
- Please provide us with details of your feedback or complaint.

- If you are able to identify the relevant person who dealt with you concerning your personal information, please include these details.

It may be necessary for us to contact you to request for more information or documentation in order to assist us or to facilitate us looking into or investigating your complaint. For this reason, we would need you to provide us with your contact details so that we can contact you for this purpose and also to respond to your complaint once we have finished looking into and or investigating your complaint.

We will use reasonable endeavours to respond to your complaints in writing in a timely manner.

## **10. Data Breach Notification**

In the event that there is a significant data breach involving 500 or more individuals and upon assessment that it is a notifiable incident, i.e., it is deemed to result in significant harm to affected individuals, we will notify the Personal Data Protection Commission (PDPC) within 3 calendar days and the affected individuals as soon as practicable, using appropriate and efficient mode of notification, providing relevant details of the data breach and include relevant information about the data breach management and remediation plans to both PDPC and affected individuals.

## **11. Updates to this Personal Data Protection Policy**

We may change or update portions of this Policy at any time and without prior notice to you. Please review this Policy from time to time so you are aware of any changes or updates to the notice. We will indicate the effective date of the notice. If you do not agree with any of the changes or updates to the Policy, you have the option of withdrawing your consent to our collection, use, disclosure and processing of your Personal Data (please refer to Section 8 above).

Effective date of PDPA	: 2 July 2014
Amendments to the PDPA	: 2 November 2020 and 1 February 2021

*Last update: 1 August 2024, 23 April 2025*