

IRR PRIVACY POLICY

Last updated: 11 April 2022

1. We care about your privacy

This Privacy Policy will help you understand the purposes for which we will use your personal data, who we share your personal data with, and the choices you have in relation to how your personal data is collected and used by us.

By interacting with us (including using our website (www.itsrainingraincoats.com) (“Site”)), submitting information to us via any means (including through the use of our online forms), or signing up for any IRR Initiatives (defined below), you acknowledge and consent to the collection, use and transfer of your personal data in accordance with this Privacy Policy.

Sometimes, we may provide additional privacy notices to explain how we may use your personal data in specific situations and you may have the choice to opt-out of such uses.

2. Who are we?

ItsRainingRaincoats Ltd. is a company limited by guarantee and a registered charity registered in Singapore with its registered office at 9 Raffles Place, #32-00, Republic Plaza, Singapore 048619 (“IRR”, “we”, “us” or “our”).

3. How do we collect data?

We generally collect your personal data when you:

- (a) visit and use our Site and any underlying services, functions, features or materials (personal data will either be provided by you or collected automatically by our Site);
- (b) participate in any of our initiatives, services, activities, events or donation drives organised, operated, held, hosted or co-hosted by us (“IRR Initiatives”);
- (c) submit an application form, request form, registration form, or other forms relating to any of our IRR Initiatives, whether as a recipient, volunteer, a donor, a beneficiary, or any other third party; or
- (d) otherwise interact with our employees and/or volunteers (for example, via emails, messaging platforms, social media platforms, telephone or video calls, physical meetings, etc.).

We will indicate if the collection and provision of certain categories of personal data is mandatory. For any such categories, if you do not provide us with the required information then you may not be able to participate in any of the IRR Initiatives or receive any requested communications or services from us. All other personal data can be provided by you on a voluntary basis.

If you are under the age of 18, you must obtain consent from your parents or guardian before providing any personal data to us.

4. What information do we collect about you?

The personal data we may collect about you includes (depending on the nature of your interaction with us) the following:

- (a) if you are a volunteer, your full name, email address, telephone number, postal address and languages spoken;
- (b) if you are an in-kind donor, your full name, email address, telephone number and postal address;
- (c) if you are a beneficiary of any of our IRR Initiatives, your full name, identity card number, race, employer organisation, email address, telephone number and postal address; and
- (d) any other items that may be requested by us.

We never collect any credit card details from you. If you wish to make a financial contribution to IRR, you can always do so via Giving.Sg, a one-stop national giving platform to donate, volunteer and fundraise for any of the over 600 registered non-profits in Singapore. Giving.Sg does not transfer or disclose any personal data collected by it to us, and we do not own or control, and are not responsible for the privacy practices of Giving.Sg.

5. **How do we use your information?**

By providing your personal data to us, you consent to the collection, use and disclosure of your personal data for the purposes set out below and for any other purposes ancillary to the below:

(a) **Administrative and operational purposes**

Managing the administrative and business operations of IRR and complying with internal policies and procedures; verifying your identity; maintaining, updating, administering and processing a record of your activities with us and your use of our services or participation in any IRR Initiatives; managing risks; and managing the safety and security of our premises, volunteers, personnel, recipients and IRR Initiatives.

(b) **Management of IRR Initiatives**

To enable you to participate in any IRR Initiatives in which you have requested to participate, keep you up to date with new and disseminate information whether as a recipient, volunteer, donor, beneficiary or in any other capacity.

(c) **Support purposes**

To assist you when you contact us, such as responding to and investigating any of your questions or concerns.

(d) **Optimisation and improvements**

We may use your personal data to understand and improve our Site, IRR Initiatives or our operations, through various means, such as the use of analytics tools, research, surveys and feedback forms. This will enable us to enhance our IRR Initiatives, services or activities, develop new features and benefits, and assess and amend marketing and strategic operations and plans.

(e) **Legal purposes**

We may use your personal data to investigate or handle any incidents, claims or disputes, or as otherwise required by law or requested by any governmental, regulatory, supervisory, judicial or administrative authority, department, agency, commission, board, panel, tribunal or court (“**Government Authority**”). We may also use your personal data in relation to any legal proceedings concerning you.

You also consent to IRR collecting, using and disclosing your personal data for the following specific purposes:

(f) **If you are a prospective or existing beneficiary**

Assessing your eligibility as a beneficiary; receiving, reviewing, managing and/or fulfilling your requests for monetary or in-kind donations; carrying out and managing any activities, events or classes which you have requested to participate in (for example, registering as a student and matching with a teacher under the MADWISH programme); reviewing and managing any other requests made by you (for example, request for legal assistance); creating and maintaining a database of IRR’s beneficiaries for internal records and reference; and/or managing our relationship with you.

(g) **If you are a prospective or existing donor**

Soliciting donations; carrying out any initiatives, activities, events or donation drives which you have requested to participate in as a donor (including any related purposes); creating and maintaining a database of IRR’s donors for internal records and reference; and/or managing our relationship with you.

(h) **If you are a prospective or existing volunteer**

Inviting you to participate in the IRR Initiatives; assessing your suitability as a volunteer; carrying out and managing any IRR Initiatives that you have requested to participate in as a volunteer (for example, registering as a teacher and matching with a beneficiary under the MADWISH programme); creating and maintaining a database of IRR’s volunteers for internal records and reference; and/or managing our relationship with you.

6. **Direct marketing**

Subject to your consent, we will use your name, address, telephone number, email address and information regarding any previous IRR Initiatives in which you have participated, in order to send you marketing and promotional materials via email, SMS or social messaging platforms to keep you updated on our IRR Initiatives, and to solicit your participation in such IRR Initiatives. We may share your personal data with our volunteers and service providers in order for them to help us send you such marketing and promotional materials on IRR's behalf.

7. **Who do we share your information with?**

(a) **Affiliate entities**

Your personal data may be disclosed or transferred to our affiliate entities (each an “**Affiliate**”) in order to fulfil any of the purposes we have set out above.

(b) Volunteers, donors or beneficiaries

Depending on the nature of your capacity and your interaction with us, your personal data may be disclosed or transferred to our volunteers, donors or beneficiaries (as the case may be) in order to carry out any IRR Initiatives which you have requested to participate in, or fulfil any of the purposes set out above. For example, if you are a prospective or existing beneficiary, your personal data may be disclosed or transferred to our volunteers and/or donors in order to carry out any requests which you have made (e.g. in-kind donations, class registrations, etc.), or if you are an in-kind donor your name, address and phone number may be circulated to volunteers in order to arrange someone to pick-up and drop-off of the items you are donating.

(c) Service providers

Your personal data may be disclosed or transferred to our service providers (including agents and contractors) who process personal data on our behalf to help us administer, maintain and operate the Site and IRR Initiatives, provide back-end, storage, administrative or IT services to us, provide any services to you, or carry out any of the purposes set out above. For example, IT vendors, back-office service providers, and telecommunication providers.

(d) Third party partners

If you are a prospective or existing beneficiary, your personal data may be disclosed or transferred to our third party partners in order to carry out any IRR Initiatives which you have requested to participate in, or fulfil any of the purposes set out above (except for direct marketing purposes). For example, your personal data may be provided to mobile phone retailers or mobile data service providers / vendors in relation to your mobile phone / mobile data requests. In relation to your requests for legal assistance, your personal data may be provided to external legal advisors, government agencies or any other non-governmental organisations. Such third parties will collect and process your personal data as a data controller, and we do not have any control over how they handle your personal data.

(e) Government Authorities

Your personal data may be disclosed or transferred to any government or regulatory authority in order to fulfil any of the legal and administrative purposes set out under Clause 5(d) above. This may include providing such government or regulatory authority with direct access to the Site, our databases and your personal data.

8. How do we keep your data secure?

We will use all reasonable endeavours to maintain the security of your personal data and to protect your personal data from misuse, interference and loss and against unauthorised collection, copying, access, modification or disclosure. However, due to the nature of the Internet, we do not provide any guarantee or warranty regarding the security of your personal data during transmission to or storage by us via electronic means and you acknowledge that you disclose your personal data to us at your own risk. We will destroy or anonymise any personal data we hold about you which is no longer required under the terms of this Privacy Policy.

9. **Where do we store your data?**

The personal data you provide to us will be transferred to and stored with a cloud service provider with servers that are generally located in various jurisdictions. Where your personal data will be transferred to a country outside of Singapore, we will ensure that the recipients in that country will provide your personal data with a standard of protection that is at least comparable to the protection under the Personal Data Protection Act 2012 (No. 26 of 2012).

10. **How long do we keep your data?**

We will only retain your personal data until it is reasonable to assume that such retention no longer serves the purpose for which your personal data was collected and is no longer necessary for legal or business purposes. We will either irreversibly anonymise or securely destroy your personal data once we no longer need it.

11. **Your rights**

We will use all reasonable endeavours to keep your personal data accurate, complete, up-to-date, relevant and not misleading. You have the right to request access to and correction of any of your personal data held by us, or withdraw your consent to our collection, use and disclosure of your personal data (except in situations when specifically authorised by you, when required by law, or in an emergency) at any time by submitting a written request to our Data Protection Officer (see “Our Contact Details” section below).

In order to ensure that your personal data is kept as accurate as possible, please notify us of any changes to your personal data

Please note that your withdrawal of consent to our collection, use and disclosure of your personal data may result in us not being able to carry out all or some of the purposes as set out in this Privacy Policy.

12. **Online tracking technology**

We may use online tracking technology on our Site such as cookies, pixel tags, web beacons and other similar technologies to automatically collect information about verifying users; remembering user preferences and settings to enhance your experience when you return to using our Site; location and usage patterns; monitoring, evaluating and optimising the operation of our Site; and analysing traffic on our Site.

You have the right to disable any of these online tracking technologies by adjusting your browser settings to modify your cookie preferences. However, if you turn off your cookies, some of our Site's services may not function properly and you will not be able to receive the most efficient and personalised experience.

13. **Links to other sites**

Our Site may contain links to other third party websites and applications, including those of our Affiliates (“**Third Party Sites**”). We do not own or control, and are not responsible for the privacy practices of those Third Party Sites. We encourage you to remain alert if you follow any links to leave our Site, and to review the privacy policies of those Third Party Sites so that you are aware of how your personal data may be collected and used by such third parties.

14. How do we manage updates to this policy?

From time to time, we may update this Privacy Policy to reflect new technologies, regulatory requirements or any other changes that may be necessary. We will notify you by posting a notice of such updated Privacy Policy on our Site and, where required by law, obtain your consent to such changes.

15. How to contact us

If you wish to contact us regarding this Privacy Policy (including in relation to any of your rights under this Privacy Policy or any other questions you may have), please contact our Data Protection Officer at dpo@itsrainingraincoats.com.