

## a) Cover Page

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Organization: City Harvest Church

## b) Summary of Major Points

I understand that PDPC is currently looking at formulating guidelines for the collection of the physical NRIC cards and NRIC numbers of the public.

I am writing in to highlight as well as to check on the following scenarios where the church collects the NRIC numbers of members. I would like to know if it is permissible for us to continue collecting under the new guidelines. It would also be good if PDPC could take these into consideration when formulating the guidelines as many churches would probably face the same situations too.

Currently, our church collects the NRIC numbers of the members and use it as a key identifier due to, but not limited, to the following:

### **1) Donation**

When members make donations, for example, to the church's building fund, they indicate their NRIC so that we can identify the correct individuals who have made donations.

The main purpose is for the issuing of receipts to them, as well as to process any refunds due to wrong amounts donated, or any other reasons.

As not all members give via credit cards, with many giving in cash, we would not be able to process receipts/refunds accurately if there is the absence of the NRIC numbers, bearing in mind that several individuals can share the same name. E.g. Mary Tan

### **2) Issuing of Water Baptism Certificates**

As water baptism certificates can be used at ICA for the purpose of allowing individuals to change their names or adding Christian names, we need to collect their NRIC for verifying their identities.

### **3) Membership Application**

As above, we use the NIRC numbers to verify the identity of those applying for membership.

### **4) Data Intermediaries**

As a church, we do work with volunteers who handle the personal data of church members. As they are considered data intermediaries, we require them to sign a Non-Disclosure Agreement before allowing them to handle these personal data. And to identify them, we require them to furnish us with their NRIC while signing the NDA.

### **5) Filling Up of Consent & Indemnity Forms**

For members who wish to participate in church organized events, they have to sign indemnity forms and for those under 21 years of age, they have to furnish the church with a parental consent form. For these 2 forms, NRIC numbers are also required.

### **6) Additionally, City Harvest Church also runs a private Bible school.**

I would like to check if private schools are allowed to continue collecting the NRIC numbers (not physical card) of the students for the purpose of registration and for verifying their identities.

### c) Comments to Questions Mentioned

NA

### d) Conclusion

We would appreciate if PDPC could take the feedback as mentioned in Point (b) into consideration while formulating the policies pertaining to the collection of NRIC numbers.