



PERSONAL DATA PROTECTION ACT GUIDELINES ON PERSONAL DATA ACCESS REQUEST

1. Definition of Data Requestor

A Data Requestor is an individual who is the requestor of the personal data. Only a Data Requestor is entitled to make a Personal Data Access Request.

2. Obligation of Raffles Marina Ltd

Under Section 21 of the Personal Data Protection Act, it states:

“(1) ... on request of an individual, an organisation shall, as soon as reasonably possible, provide the individual with:

- a) personal data about the individual that is in the possession or under the control of the organisation; and
- b) information about the ways in which the personal data referred to in paragraph (a) has been or may have been used or disclosed by the organisation within a year before the date of the request.”

Under this Section, Raffles Marina Ltd is obligated to provide Data Requestor the personal data we are holding on him/her, when requested.

Raffles Marina Ltd is obligated to give a description of the information and inform the purpose/purposes for holding the personal data.

3. Procedures on Personal Data Access Request

To provide the Data Requestor the personal data Raffles Marina Ltd is holding on him/her, the Data Requestor must provide the following:

- a) Request to be made in writing by completing the Access Request Form. The Access Request Form is obtainable by emailing to pdpo@rafflesmarina.com.sg.
- b) Reasonable degree of appropriate information to enable us locate the personal data required. No reason for the request is needed.



- c) Raffles Marina Ltd will make reasonable enquiries to satisfy ourselves about the identity of the Data Requestor to ensure we are not disclosing personal data to a party who is not entitled to it.
- d) An Administration Fee may be charged for the handling and processing of your request to access your personal data. If so, we will inform you of the fee beforehand. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee and the fee is so paid.
- e) Please note that access to personal data may be refused in a number of circumstances such as requests which would impose an unreasonable burden in terms of expense; personal data that relates to anticipated legal proceedings; or the request for access is frivolous or vexatious. If we deny or restrict your access, we will do so in writing including the reasons for the denial. However, the administration fee received will not be refunded.
- f) Personal Data Access Request to be submitted along with the Administration Fee to the Personal Data Protection Officer, Raffles Marina Ltd, 10 Tuas West Drive, Singapore 638404.
- g) The Personal Data Access requested will be made available within 30 days of receipt of the request. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested.
- h) In the event that the Personal Data Access Request is very general, for instance, to provide the Data Requestor everything we have on him/her, Raffles Marina Ltd will seek more detailed information on the nature of the request, such as date/time of the particular incident, the identity of the other party involved, etc. However, this will be dealt with on a case-by-case basis.
- i) The personal data communicated to the Data Requestor will be in tangible form. This means that a photocopy or printout of the personal data will be provided to the Data Requestor. However, if the Data Requestor has requested and agreed, the personal data will be provided in electronic format that is via email.



4. Information which will not be provided

Raffles Marina Ltd will not provide or disclose the following types of information in relation to a Personal Data Access Request:

a) Duplicate Request

In the event that personal data has already been provided to the Data Requestor or his/her legal representative, Raffles Marina Ltd will not provide a further copy of the same personal data in respect to the Personal Data Access Request. The administration fee received will not be refunded.

b) Repeat request

In the event that personal data has already been provided to the Data Requestor and a further identical request is made within a period of six months of the original date of request, and there has been no significant change in the personal data held by Raffles Marina Ltd, it will be classified as a repeat request. The administration fee received will not be refunded.

c) Information available in Public Domain

Raffles Marina Ltd will not consider that it is an obligation to provide information that is already in the public domain.

d) Information about other individual

In the event that Personal Data Access Request involves information which relates to one or more individuals other than the Data Requestor, the information about the other individual may be personal data about that individual. Hence, the personal data protection rules under the Personal Data Protection Act 2012, including the restrictions on disclosure, apply. In view of this, Raffles Marina Ltd will not grant access to the information in question.

e) Information given in confidence

In all cases, Raffles Marina Ltd is not obligated to provide or disclose information in response to a Personal Data Access Request if the information held by us is given in confidence.



f) Privileged information

Raffles Marina Ltd will not disclose any privileged information in relation to Personal Data Access Request that is currently being pursued in court's proceedings.

g) Statement of Account

Statement of Account will not be provided in response to Personal Data Access Request. However, Data Requestor may obtain the Statement of Account and other information related to their accounts from our Finance Manager.

h) Interference with operations of Raffles Marina Ltd

Raffles Marina Ltd will not disclose or provide information that would unreasonably interfere with our operations.

i) Unreasonable expense

If the burden or expense of providing access would be unreasonable to Raffles Marina Ltd.

j) Data Access Request refusal

In the event that Raffles Marina Ltd denies a Personal Data Access Request, we will do so in writing including the reasons for the denial.

If an individual is not satisfied with the response given by Raffles Marina Ltd, he/she has the right to lodge a complaint to the Personal Data Protection Commissioner.



5. Section 21: Not obligated to provide personal data or information

Under Section 21, clause (3) of the Personal Data Protection Act, it states that "An organization shall not provide an individual with the individual's personal data or other information under subsection (1) if the provision of that personal data or other information, as the case may be, could reasonably be expected to:

- (a) threaten the safety or physical or mental health of an individual other than the individual who made the request;
- (b) cause immediate or grave harm to the safety or to the physical or mental health of the individual who made the request;
- (c) reveal personal data about another individual
- (d) reveal the identity of an individual who has provided personal data about another individual and the individual providing the personal data does not consent to the disclosure of his identity; or
- (e) be contrary to the national interest

In addition to this Section, please refer to *Exceptions from Access Requirement* under *The Fifth Schedule of Personal Data Protection Act 2012*
<http://www.pdpc.gov.sg/personal-data-protection-act/the-act>

6. Correction of Personal Data

If Data Requestor believes that any personal information under our possession or control is incorrect or incomplete, he/she may wish to inform the Personal Data Protection Officer. Raffles Marina Ltd will correct any information found to be incorrect within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest possible time within which we can make the correction. For further information on correction of Personal Data, please refer to "Correction of Personal Data".