

**Bowls Singapore (BSG)  
Privacy Policy**

Bowls Singapore (BSG) recognises its obligations under the Personal Data Protection Act 2012 (“PDPA”) and this Privacy Policy is to help you understand how BSG, (“BSG”, “we”, “us”, or “our”) collects, uses, discloses and cares for the Personal Data you have provided to BSG, as well as to assist you in making an informed decision before providing us with any of your Personal Data.

BSG recognises the importance of the Personal Data you have entrusted to us and are committed to properly manage and protect your Personal Data.

In this Privacy Policy, any reference to “you” shall include the parent or legal guardian of an individual who is a minor.

**Personal Data** (“Personal Data”) includes any information which identifies you such as your name, any type of unique identifier (including full or partial NRIC, FIN, Passport numbers), telephone number, address, email address, social media handle, image, photograph, video, PayNow or PayLah or bank details, name of employer or school, emergency or next-of-kin contact details, and any other information relating to you, which you have provided to us.

**1. Purposes for Which We Process Your Personal Data**

The purposes (“purposes”) for which BSG processes Personal Data include the following as may be applicable to you:

- a. Processing your membership, admission or registration with us;
- b. Providing you with BSG’s services, including but not limited to organising and facilitating your participation in BSG events and activities (such as coaching, training and competitions), your use of BSG facilities, administering rankings, facilitating selection for national teams;
- c. Providing you with newsletters and information of BSG events, local or overseas tournaments or other matters related to law bowls.
- d. Publicity purposes, including but not limited to publishing event photographs and videos; media articles; membership, event and activity updates; and/or any other publicity materials which may showcase BSG members and/or members’ achievements and include your photographs.
  - i. **Please do note that photographs(s) or video images of you may be taken during such activities/ events/ competitions and used, disclosed, processed and published on BSG & co-organisers’ social media platforms, websites and in materials such as publications, or any materials/books and you agree to the same.** BSG will provide appropriate Personal Data collection notice signages at the activity/ event/ competition;
- e. Contacting you via different modes such as phone/voice call, short text message, email and/or letters for BSG related matters such as BSG events, training, competition arrangement;

- f. Carrying out background checks, investigation and screen activities in accordance with legal or regulatory obligations;
  - i. BSG may carry out background checks, screening and verification (including criminal record checks where permitted by law) for coaches, volunteers, officials and staff as part of recruitment, safeguarding, accreditation and selection processes. Screening results will be treated as confidential, retained only for the period necessary for the recruitment or safeguarding purpose, and access will be limited to authorised personnel. Where third-party screening providers are used, BSG will ensure contractual safeguards consistent with PDPA requirements.
- g. Dealing with feedback, grievances, complaints and related matters;
- h. Conducting disciplinary and security matters and/or arrangements. Please be informed surveillance cameras may be installed in BSG training facilities for security reasons;
- i. Producing statistics and research for internal and/or statutory reporting and/or record keeping requirements and performing BSG policy/process reviews;
- j. Carrying out research, analysis and development activities, including but not limited to data analytics, surveys and/or profiling to improve any of the BSG programmes;
- k. Responding to requests for information from local hospitals, embassies, public agencies, ministries, statutory boards or similar authorities;
- l. Complying with any government or regulatory requirements of any relevant jurisdiction to make disclosure;
- m. Marketing, promotion and advertising purposes, including but not limited to sharing information about relevant benefits and rewards from our sponsors. BSG has the right to use your name, photograph, video images, personal story and information you provide to BSG in BSG's promotional materials; and To contact you for fund raising activities for BSG selected causes by various modes of communication platforms including but not limited to phone/voice call, short text message, email, social media and/or postal mail.

## **2. Collection of Personal Data**

Generally, we collect Personal Data in the following ways:

- a. Joining BSG or applying to join BSG as a player, member, coach, volunteer, sponsor, official and/or employee;
- b. Participating in BSG events and activities (including but not limited to lessons, coaching and officiating courses and tournaments);
- c. Creating an account on and/or using on online portal maintained by BSG;
- d. Responding to our surveys, providing us with feedback or contacting us about any matter, whether via email, letters or telephone calls.

If you provide us with Personal Data of other individuals (for e.g., your emergency contact(s)) you warrant that you have obtained their consent for their Personal Data to be collected, used and disclosed in accordance with this Privacy Policy.

At or before the point of collecting Personal Data from you, BSG will notify you of the purposes for which your Personal Data is being collected. Where Personal Data is collected from a third party, we will notify you of the collection and the purposes as soon as practicable unless notification is not required or permitted by law.

### **3. Your Consent**

We generally do not collect your Personal Data unless it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your Personal Data to us after you or your authorised representative have been notified of the purposes for which the data is collected, and you or your authorised representative have given consent to the collection and use of your Personal Data for those purposes. We may collect or use Personal Data without consent where it is permitted or required by the PDPA or other laws.

### **4. Accuracy of Data**

BSG will make reasonable efforts to ensure that Personal Data in our possession is accurate, complete and up to date before we use or disclose it. Where appropriate, we will verify the accuracy of Personal Data with you or other reliable sources.

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested. You should update us in a timely manner of all changes to the information provided to us.

### **5. Cookies**

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you visit our website and allows us to improve user experience.

If you do not wish the cookies in our website to collect information about you (for example, store your preferences and record session information), you can adjust settings on your browser so that you will be notified when you receive a cookie. Should you wish to disable the cookies associated with these technologies, you may do so by changing the settings on your browser. However, by doing so, you may not be able to see certain functions or enter part(s) of our websites.

## 6. Disclosure of Your Personal Data

BSG will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to any applicable law, we may disclose Personal Data for any of the purposes specified above to:

- a. our trusted partners, third party service providers, collaborating entities, agents, independent contractors or providers of professional services who work with us to or on our behalf provide and deliver services to support BSG's programmes, services, and operations and stipulate their compliance with data protection laws;
- b. any person to whom disclosure is allowed or required by law, regulation or any other applicable instrument;
- c. any court, tribunal, regulator (including national and/or international regulator), enforcement agency, exchange body, tax or other authority where we are required to do so by applicable law and/or regulation; any authority or regulator; any directive, order or request of any authority or regulator; or any agreement with a regulator or an authority;
- d. relevant government authorities, ministries, statutory boards and agencies; and
- e. any other party to whom you authorise us to disclose your Personal Data to.

You may withdraw your consent for any or all purposes set out in this Privacy Policy by giving us reasonable notice in writing. We will inform you of the likely consequences of withdrawing consent for the specific purposes you identify. Where withdrawal of consent prevents us from providing a service you have requested, we will explain the specific consequences and, where appropriate, discuss alternatives. We will not treat withdrawal as an automatic termination of contractual relationships without first assessing the specific circumstances.

## 7. Security

Where Personal Data is transferred outside Singapore, BSG will ensure that the recipient provides a standard of protection comparable to the PDPA. We will do so by using contractual data protection clauses, ensuring the recipient is subject to binding corporate rules, or other legally recognised safeguards.

BSG has implemented reasonable technical and organisational measures to protect Personal Data. In the event of a data breach that is likely to result in significant harm to affected individuals or is of a scale that requires notification, BSG will notify the Personal Data Protection Commission (PDPC) and affected individuals as required by law and will take steps to contain and remediate the breach.

## **8. Overseas Transfer**

BSG may share Personal Data with foreign national federations, international governing bodies, tournament organisers, anti-doping authorities, insurers or service providers (such as travel agents, airlines, hotels or transport providers) when athletes participate in overseas competitions or when services are hosted outside Singapore. Such transfers will only occur where the recipient provides a standard of protection comparable to the PDPA. BSG will implement appropriate safeguards such as contractual data protection clauses, binding corporate rules, or other legally recognised mechanisms. Typical examples include athlete accreditation data shared with event organisers and medical information shared with tournament medical teams; where practicable, BSG will notify affected individuals before such transfers.

## **9. Retention**

BSG will retain Personal Data only as long as necessary for the purposes set out in this policy or as required by law. We maintain retention schedules for major categories of Personal Data and will securely delete or anonymise Personal Data when it is no longer required.

## **10. Data Processing of Minors' Information**

For the purposes of this policy, a “minor” is any individual under 18 years of age. Where we collect Personal Data of a minor, BSG will obtain verifiable parental or legal guardian or school consent prior to collection or use. BSG may request additional proof of parental authority where necessary (for example, a signed consent form or confirmation by email).

## **11. Health and Medical Information**

BSG may collect health or medical information where necessary for participant safety, first aid, insurance, selection or competition requirements. Such information will be treated as **sensitive for operational purposes** and will only be accessed by authorised personnel (medical staff, designated coaches, event safety officers and the DPO). Where health data is used for non-medical purposes (for example, publicity or research), BSG will obtain **explicit consent**. Health and medical data will be retained only for as long as necessary for the purpose collected and in accordance with our retention schedule; access is restricted and records are stored securely.

## **12. Contacting Us**

You have the right to request access to Personal Data that BSG holds about you and to request correction of any errors or omissions. We will respond to access and correction requests within a reasonable period and in accordance with the PDPA. If we refuse a request, we will provide the reasons for refusal and the avenues for appeal in writing.

If you have a complaint about how we handle your Personal Data, please contact our Data Protection Officer at [bowlssg.privacy@gmail.com](mailto:bowlssg.privacy@gmail.com). We will acknowledge receipt within 10 business days and aim to resolve complaints within 30 business days.

## **13. Links to Other Websites**

While using or interacting with BSG, you may come across links to third party websites. If you click on or follow any of those links, please be aware that third party websites have their own privacy policies and BSG has no responsibility or liability for those policies. It is your responsibility to check those policies before using or submitting any data to any of those websites.

## **14. Updates to This Privacy Policy**

BSG may amend this Privacy Policy at any time to ensure that it is consistent with any developments to the way BSG uses Personal Data or any changes to the laws and regulations applicable to BSG. We will make available the updated Privacy Policy on our website. All communications, transactions and dealings with BSG shall be subject to the latest version of this Privacy Policy in force at the time.

Prepared by: Kelvin Kwek, DPO  
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