



Sustainable Living Lab Pte Ltd | UEN: 201211858M

StayCool Data Protection Notice for Participants

A community heat-resilience programme delivered by Sustainable Living Lab (SL2), supported by the SG Eco Fund

Applies to	StayCool participants, prospective participants, and their authorised representatives
Programme	StayCool
Effective / Last Updated	28 August 2026

This Data Protection Notice ("**Notice**") sets out the basis upon which Sustainable Living Lab Pte Ltd ("**SL2**", "**we**", "**us**" or "**our**") collects, uses, discloses or otherwise processes the personal data of StayCool participants, in accordance with the Singapore Personal Data Protection Act 2012 ("**PDPA**") and all associated regulations and guidelines issued from time to time by the Personal Data Protection Commission ("**PDPC**").

This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations we have engaged to collect, use, disclose or process personal data on our behalf and for our purposes ("**Data Intermediaries**").

1. Definitions

1. "**Participant**" means an individual who (a) has contacted us through any means to find out more about the StayCool programme; (b) has entered, or may enter, into a [StayCool Participant Consent & Declaration Form](#) with us for the StayCool programme; or (c) has been referred to us by any community partner organisation, including but not limited to Voluntary Welfare Organisation ("VWO"), Active Ageing Centre ("AAC"), the Agency for Integrated Care ("AIC"), or a grassroots body.
2. "**Personal data**" means data, whether true or not, about an individual (whether a prospective participant, current participant, participant's authorised representative, caregiver, next-of-kin, or other household member) who can be identified: (a) from that data; or (b) from that data and other information to which we have, or are likely to have, access.
3. "**Protection, Retention Limitation, and Data Breach Notification requirements**" means, collectively, SL2's obligations under this Notice to: (a) implement appropriate administrative, technical, and physical measures to protect personal data (see Section 11); (b) limit the retention of personal data to no longer than is necessary for the purpose for which it was collected, or as required by law (see Section 13); and (c) notify the PDPC and affected individuals of any notifiable data breach in accordance with the Personal Data Protection (Notification of Data Breaches) Regulations 2021 (see Section 11.4). Where SL2 engages a data intermediary or technology partner, that partner is contractually bound, by written agreement, to comply with these same requirements.
4. Other terms used in this Notice shall have the meanings given to them in the PDPA, where the context so permits.

2. Personal Data We Collect

The personal data we collect from you depends on the nature of your interaction with us. As a general guide, we may collect the following categories of data:

Category	Examples
Basic and contact information	Full Name (as shown on NRIC or equivalent), residential address, email address, telephone number, age group, gender, household composition, and the identities and contact details of your next-of-kin, caregiver, or authorised representative
Housing information	Flat type and floor level are used to understand your home's heat profile
Emergency contact information	The name, relationship to you, and contact details (e.g., phone number) of a person you nominate to be contacted in the event of an emergency
Health and safety information	Chronic condition status (Yes/no basis), pregnancy status (Yes/no basis), and other health information you choose to share with us, provided voluntarily and not required as a condition of joining the programme
Financial situation	Where relevant to assessing eligibility for, or need for, the StayCool programme
Environmental sensor data	Indoor temperature and humidity readings are collected continuously from sensors placed in up to 3 rooms of your home
Physiological wearable data	Heart rate, heart rate variability (HRV), blood oxygen saturation (SpO2), and step count/movement data, collected from your StayCool wearable
Photographs and audio-visual information	Taken during programme activities (e.g. StayCool onboarding, sensor installation, outreach events). We obtain prior consent for photographs of you individually or taken in your home. At public events such as talks or market booths, general or group photographs may be taken. You may ask not to be photographed or to have your image removed. See Section 8.

Important: None of the StayCool devices, including the environmental sensors, the wearable, or any associated equipment, contains a camera or microphone. None of the equipment is capable of audio or video recording. The environmental sensors measure only temperature and humidity.

3. How We Collect Your Personal Data

We collect personal data about you in the following ways:

1. Directly from you (or your authorised representative) when you sign up for or participate in the StayCool programme, complete surveys, attend a training/onboarding session, or interact with the StayCool app;
2. Passively, through the environmental sensors and physiological wearable devices installed or issued to your household as part of the programme;
3. From community partner organisations, including but not limited to VWOs, AACs, grassroots organisations, or AIC, where you have been referred to us through those channels;
4. From trained StayCool volunteers who visit or contact your household and record observations strictly in connection with programme activities (e.g., confirming a device is working, noting a welfare concern to be followed up by our team); and
5. From digital platforms that we operate, or that are operated on our behalf. Where we engage technology partners to develop, host, maintain, or support these platforms, they may have access to personal data solely for the purpose of providing such services to us and in accordance with our instructions. Our technology partners are not authorised to collect, use, or disclose your personal data for their own purposes (see Section 6 below).

4. How We Use Your Personal Data

We may collect, use and disclose your personal data for the following purposes:

Programme Delivery

1. To assess your eligibility, onboard your household, and set up devices under the StayCool programme;
2. To deliver personalised heat-health alerts and cooling advice through the StayCool app and AI engine;
3. To schedule and coordinate volunteer visits and physical support activities;
4. To follow up, whether identified through a volunteer's observations during a household visit, or through our review of sensor and wearable data, on where programme devices have not been activated, or where welfare concerns are flagged, including by deploying a volunteer to the household concerned; and
5. To organise and/or arrange volunteers for your household based on availability, language, and need.

Programme Learnings

1. To measure indoor thermal comfort and physiological heat strain at the household level;
 2. To assess the effectiveness of cooling advice and physical interventions over the programme period;
 3. To produce findings that contribute to Singapore's climate-health evidence base; and
 4. To publish aggregated and anonymised findings in a publicly accessible report upon programme completion.
- No individually identifiable data will be published.

Programme Operations and Compliance

1. To manage participant communications and programme scheduling;
2. To enable our technology partners to develop, operate, maintain, and improve the sensors, wearables, app, and AI engine used to deliver the programme;
3. To meet our grant reporting obligations to the SG Eco Fund (Grant Reference: 2506OR048) under the Ministry of Sustainability and the Environment ("MSE");
4. To maintain records required by applicable law or regulation; and
5. To handle feedback, complaints, or enquiries relating to the programme.

The purposes listed above may continue to apply even after your participation in an SL2 programme(s) has ended, to the extent reasonably necessary to fulfil those purposes or as required or permitted under applicable law. However, if you withdraw from an ongoing SL2 programme(s), or subsequently withdraw your consent after your participation has ended, we will cease collecting, using, or disclosing your personal data for the relevant purposes from the date of your withdrawal, unless continued processing is required or permitted under applicable law.

5. Our Basis for Collecting, Using, and Disclosing Your Personal Data

1. Before we collect, use, or disclose your personal data, we will notify you of the purpose for doing so and obtain your consent (or that of your authorised representative), except where the PDPA permits us to do so without consent.
2. You (or your authorised representative) may be taken to have given **deemed consent** where you voluntarily provide personal data to us for an obvious purpose (for example, providing your contact number so that a volunteer can reach you).
3. Where you have been referred to us by a community partner organisation, we will still independently notify you of our purposes and obtain your consent at the point of sign-up, before collecting or using your personal data for StayCool's purposes.
4. We may, in limited circumstances permitted under the PDPA, collect, use or disclose personal data without consent, for example, where necessary to respond to an emergency threatening your life, health or safety; where necessary in the national interest or for an investigation; or where we rely on the research or business improvement exceptions to analyse anonymised programme data for the purposes described in Section 4 above.
5. If you choose not to provide certain personal data, we may not be able to enrol or continue supporting your household in the programme. We will explain the likely consequences to you before processing any such decision.

6. Disclosure of Your Personal Data to Third Parties

We will not sell, rent, or trade your personal data to any third party. We may disclose your personal data only to the following categories of recipients, strictly for the purposes set out in this Notice:

Recipient	Purpose and safeguards
Trained StayCool volunteers	To conduct home visits, set up devices, and provide welfare check-ins and cooling advice. Volunteers are trained and bound by confidentiality obligations and a signed StayCool Volunteer Consent & Declaration Form .
Technology and software partners	To develop, operate, maintain, and improve the sensors, wearables, mobile app, and AI engine used to deliver the programme. These partners process data strictly on our instructions, under a written contract, and are contractually bound to our Protection, Retention Limitation, and Data Breach Notification requirements as data intermediaries. Where overseas access is involved, see Section 8 below.
Partner organisations (e.g. VWOs, community bodies, grassroots organisations)	To coordinate referrals and run joint programme activities. Only the minimum necessary data is shared, and data handling expectations are communicated to all partners in advance. Many of our community partners are additionally bound by a signed Partner Memorandum of Understanding (MOU) covering data handling; a copy can be requested from our DPO.
SL2's scientific research team	Where the data shared is fully anonymised in accordance with PDPC guidance, it does not constitute personal data, and the PDPA's transfer restrictions do not apply. Where any pseudonymised or individually identifiable data is shared with this team, such sharing will be governed by a written data transfer agreement imposing PDPA-equivalent protection standards. Where overseas access is involved, see Section 8 below.
Relevant grant bodies or statutory partners	For grant reporting and compliance purposes. Only aggregated or anonymised data will be shared, unless otherwise required by law.
Government agencies or statutory boards	Where required or authorised by law.

Sharing data about other people: If you give us personal data about a third party, such as your next-of-kin, caregiver, or another household member, you confirm that you have informed that individual and obtained their consent for us to collect, use, and disclose their personal data for the purposes described in this Notice.

7. Reliance on the Legitimate Interests Exception

1. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of SL2 or another person. In relying on the legitimate interests exception under the PDPA, SL2 will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
2. In line with the legitimate interests exception, we will collect, use or disclose your personal data for the following purposes:
 - a. Fraud detection and prevention;
 - b. Detection and prevention of misuse of our services and programme resources; and
 - c. Network and system security analysis to prevent fraud and data security incidents.

The purposes listed in Section 7.2 may continue to apply even where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter.

8. Overseas Access of Personal Data

1. In the course of delivering StayCool, your personal data may be accessed from overseas locations, where necessary, by our technology and software partners (for cloud hosting, AI processing, and application support) and by SL2's scientific research team (for data analysis and research). Your personal data remains stored within Singapore and is protected through appropriate technical and organisational measures, including encryption in transit and at rest. The specific countries from which such access may occur may change from time to time as our partners and research collaborations evolve. Current details are available from SL2's Data Protection Officer on request.
2. Before authorising such access, we take steps to ensure that the recipient is bound by legally enforceable obligations to provide a standard of protection for your personal data that is comparable to the protection under the PDPA. This is achieved through written contracts, role-based access control rules, and restrictions on the recipient's further use, disclosure or re-identification of the data.
3. We do not permit access to your personal data from any other overseas location without either your consent or appropriate safeguards consistent with the PDPA's Transfer Limitation Obligation.
4. We conduct reasonable due diligence before permitting overseas access and periodically review whether the recipient continues to provide a standard of protection comparable to that required under the PDPA.

9. Photographs, Video, and Other Recordings

1. Where we take photographs or video recordings of you in your home, or of you individually (such as during onboarding or device installation), we will do so only with your prior consent and for the stated purpose (for example, internal reporting or publicity for StayCool).
2. At larger or public events (such as outreach sessions, community events, or group activities) where general or group photographs may be taken, you may ask not to be photographed, or ask us to remove an image of you.
3. You may withdraw your consent for the future use, retention, or publication of such photographs or recordings at any time, by contacting us using the details in Section 17. We will cease further use or disclosure following your withdrawal, save where we are required or authorised to retain or use the material under the PDPA or other written law (for example, where it has already been made publicly available). We are not able to recall copies that have already been lawfully distributed prior to your withdrawal.
4. No closed-circuit television, audio recording device, camera or microphone is installed in your home as part of the StayCool programme.

10. Anonymisation and Use of Data for Research

1. During the active monitoring period, your household's environmental sensor and wearable data is identifiable at the household level, as this is necessary to generate personalised alerts and cooling advice for you.
2. Before this data is used for research, evaluation or publication, we anonymise it in line with the PDPC's published guidance on anonymisation, including the removal of direct and indirect identifiers, aggregation across households, and periodic review of re-identification risk.
3. Findings arising from the programme will be published only in a form that does not identify any individual participant or household.
4. Personal data about you is not "owned" by SL2 or any other party — under the PDPA, you retain rights over your own personal data (see Section 13 below), while SL2 is responsible for its collection, use, and protection. Anonymised and aggregated datasets and findings produced from StayCool programme data (which no longer identify any individual) are SL2's programme deliverables, and SL2 may use, publish, and share them for research and public-good purposes as described in this Notice, subject to any data-sharing terms agreed with our grant funder (the SG Eco Fund, under the Ministry of Sustainability and the Environment).

11. Protection of Your Personal Data

1. We have implemented appropriate administrative, technical, and physical measures to protect your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal, or similar risks. These measures are implemented in accordance with PDPC guidelines and include:
 - a. **Data minimisation:** Only personal data that is necessary for programme participation and research outcomes is collected from participants;
 - b. **Device and household privacy:** No cameras or microphones are deployed in any participating household at any time. Data collected by sensors and wearables are transmitted to our secure cloud system via an encrypted connection, independent of your home Wi-Fi;
 - c. **Access controls:** Access to personal data is restricted to authorised SL2 personnel and trained volunteers on a need-to-know basis and need-to-basis data disclosure;
 - d. **Authentication:** One-Time Passwords (OTP), Two-Factor Authentication (2FA), or Multi-Factor Authentication (MFA) are used to secure access to systems handling personal data;
 - e. **Encryption:** Data is encrypted in transit and at rest to ensure end-to-end protection of all transmitted information;
 - f. **System security:** Endpoint protection measures, regular patching of operating systems and software, and secure system configurations aligned with relevant security baselines are maintained to reduce exposure to security threats and vulnerabilities;
 - g. **Security reviews:** Regular security reviews and testing are performed to proactively identify and address potential risks; and
 - h. **Volunteer obligations:** Volunteers are trained on data confidentiality obligations before being assigned to any household.
2. Where we disclose your personal data to a data intermediary, we require them, by written contract, to implement security measures that provide a comparable standard of protection.
3. No method of transmission over the internet, or method of electronic storage, is completely secure. While we cannot guarantee absolute security, we take reasonable steps to protect your personal data and regularly review our security measures.
4. **Data breach notification:** In the event of a data breach that is notifiable under the Personal Data Protection (Notification of Data Breaches) Regulations 2021, we will notify the PDPC no later than three (3) calendar days after determining that the breach is notifiable, and will notify you without undue delay where the breach is likely to result in significant harm to you.

12. Accuracy of Personal Data

1. We will take reasonable steps to ensure that your personal data collected by us is accurate, complete and up-to-date.
2. Please notify us promptly of any changes to your personal data by contacting us using the details set out in Section 17 below.

13. Retention of Personal Data

1. We will cease to retain your personal data, or remove the means by which it can be associated with you, as soon as it is reasonable to conclude that the purpose for which it was collected is no longer being served by retention, and retention is no longer necessary for legal or business purposes.
2. The environmental sensors, wearable, and associated equipment issued to your household are yours to keep, and may continue to function, even after your participation in the StayCool programme or your use of the StayCool app ends. This is separate from our retention of your personal data, which follows the rules set out below.
3. As a general guide:
 - a. **Participant contact, identity, and StayCool app account data** will be retained for as long as you continue to use the StayCool app. We will delete this data within 12 months of the earliest of:
 - i. the date you remove or delete your account from the StayCool app;
 - ii. the date you withdraw from the StayCool programme during the study data collection

- period; or
 - iii. the date you contact our Data Protection Officer to request removal of your data; unless retention is required for legal or regulatory purposes;
- b. **Sensor, wearable, and survey data already collected** will be retained for the StayCool study data collection period and for 5 years thereafter, to support grant audit and reporting obligations to the SG Eco Fund under the Ministry of Sustainability and the Environment (Grant Reference: 2506OR048), and to allow for research verification and dispute resolution purposes. Once any of the events in paragraph (a) above occurs, we will stop collecting further sensor, wearable, or survey data from you, but data already collected will continue to be retained for this statutory period; and
- c. **Anonymised or aggregated research data** may be retained indefinitely for public-good research and programme improvement purposes.

14. Your Rights

1. You (or your authorised representative) may, at any time, request:
 - a. Access the personal data about you that is in our possession or under our control;
 - b. Correct any personal data about you that is inaccurate, incomplete, misleading, or not up to date; or
 - c. Withdraw your consent to our collection, use, or disclosure of your personal data.
2. We may require reasonable verification of identity before processing such requests.
3. To exercise these rights, please request to remove them via the mobile app and/or submit a request to our Data Protection Officer using the contact details in Section 17. We will respond to your request as soon as reasonably possible. In general, our response will be within ten (10) business days, given the often time-sensitive and welfare-related nature of participant requests
4. If we are unable to process your request, we will inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
5. If you withdraw your consent, depending on the nature of your withdrawal, we may not be in a position to continue supporting your household's participation in StayCool (for example, where withdrawal requires us to help you uninstall the StayCool app). We will explain the likely consequences to you before processing your request.
6. Your withdrawal of consent does not affect our right to continue to collect, use or disclose personal data where this is permitted or required under the PDPA or other applicable law, and does not affect the lawfulness of anything we did with your data before your withdrawal took effect.

15. Minors and Other Household Members

StayCool household participants include, but are not limited to, seniors aged 60 and above, a person with chronic condition(s), or expectant mothers. Where information about a minor (an individual below 18 years of age) in your household is incidentally collected, for example, as part of household composition, or because the minor is present during a volunteer visit or photograph, we will only collect, use or disclose that minor's personal data with the consent of the minor's parent or legal guardian, save where an exception under the PDPA applies.

16. Cookies

Our website and StayCool mobile application may use cookies and similar technologies to support essential functions, remember your preferences, and analyse how our website and app are used. Where these technologies collect personal data, we process that information in accordance with this Notice. For more information about the cookies and similar technologies we use, their purposes, and how you can manage your preferences, please refer to our Cookie Policy.

17. Important Notes

1. **Not a medical device.** The StayCool sensor and wearable are not medical devices. They are designed to detect environmental and physiological heat risk and to prompt simple protective action. They are not a substitute for medical advice, diagnosis, or treatment, and any guidance in the app is general in nature. Please consult your doctor about any medical condition, and continue to follow any advice your doctor has already given you, including on fluid intake, medication, or activity.
2. **Voluntary with no cost involved.** Participation in StayCool is entirely voluntary and free of charge. There is nothing to buy, no sales involved, and no obligation to continue if you change your mind. Choosing not to take part, or stopping later, will not affect any other service or support you receive from us or from our community partners.
3. **Visits to your home.** Any visit to your home will only take place with your prior consent. You may ask to see the identification of any StayCool team member or volunteer before allowing them entry, and you may ask them to stop or leave at any time.
4. **No recording in your home.** No camera, microphone, or other recording device is placed in your home under the StayCool programme. The sensors measure only temperature and humidity (See Sections 2 and 11).
5. **You stay in control of your data.** You can ask to see the personal data we hold about you, ask us to correct it, or withdraw your consent at any time, by contacting our Data Protection Officer (Section 17). We will explain what withdrawing means for your participation before we act on it (See Section 14).

18. Data Protection Officer / Contact Us

SL2 has appointed a Data Protection Officer (“**DPO**”) to oversee management of personal data in accordance with the PDPA. If you have any questions about this Notice, or how SL2 manages, protects and/or processes your personal data, please contact our DPO at dpo@sustainablelivinglab.org

19. Updates to This Notice

We may update this Notice from time to time to ensure it remains consistent with our practices and with any changes to applicable law. Where a change is material, we will notify you through the StayCool app or by direct communication before the change takes effect. The date of the most recent update is indicated at the top of this Notice.