

PERSONAL DATA PROTECTION COMMISSION

Case No. DP-1910-B5129

In the matter of an investigation under section 50(1) of the
Personal Data Protection Act 2012

And

Actstitude Pte Ltd

SUMMARY OF THE DECISION

1. Actstitude Pte Ltd (the “**Organisation**”) is a social media platform marketing agency. It has a webpage allowing individuals interested in joining the Organisation to upload their resumes. For each resume uploaded, a file was created with a Uniform Resource Locator (“**URL**”) and stored in a database. Between August 2018 to October 2019, over 160 individuals uploaded their resumes.
2. The Organisation, however, admitted that it did not put in place controls to restrict access to the resume files. The URLs generated by the Organisation could also be manipulated to access resume files uploaded by different individuals.
3. When the webpage was created on 5 July 2018, the Organisation did not conduct vulnerability scanning as part of pre-launch testing; neither did the Organisation conduct periodic security reviews. Such scans offer a reasonable chance of detecting both the lack of access controls and the vulnerability of the URLs to manipulation.

4. The result of this failure to put in place access controls or to conduct security testing was that Google indexed and disclosed the URLs when a search was made of the names in the uploaded resumes. The URLs could then be manipulated to access the resumes of other individuals. This led to a complaint to the Personal Data Protection Commission on 25 October 2019.

5. The Deputy Commissioner for Personal Data Protection therefore found that the Organisation did not adopt reasonable steps to protect personal data in its possession or under its control against risk of unauthorised disclosure. The Organisation was in breach of the Protection Obligation under section 24 of the Personal Data Protection Act 2012. Upon consideration of the facts, a warning was issued to the Organisation. No directions are required as the Organisation had taken action to address the gaps in its security arrangements.