

PERSONAL DATA PROTECTION COMMISSION

Case No. DP-1906-B4115

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

And

Tanah Merah Country Club

Editorial note: An application for reconsideration was filed against the decision in *Re Tanah Merah Country Club*. Pursuant to this application, the Commissioner has decided to reduce the financial penalty imposed on the Organisation from \$8,000 to \$4,000. As the application did not give rise to significant legal or factual issues, a separate decision on the application will not be published.

SUMMARY OF THE DECISION

1. On 19 June 2019, Tanah Merah Country Club (the “**Organisation**”) informed the Personal Data Protection Commission (the “**Commission**”) of unauthorised access to its electronic direct mail (“**EDM**”) system (the “**Incident**”). During the Incident, which occurred on 9 June 2019, the EDM system was used to send unauthorised spam emails.
2. The Organisation was unable to determine how unauthorised access was gained to the EDM system. During investigations, it was discovered that the common password for login to the EDM system was weak, as it comprised the initials of the Organisation and the year 2010 (which was the year that the EDM system was set up). The password was shared by at least 3 persons: 2 of the Organisation’s marketing staff and its technical support vendor. Further, it had not been changed since 2010. Investigations disclosed that there were no arrangements in place to ensure and enforce password strength, expiry and protection.
3. In the circumstances, although the means of unauthorised access to the EDM system was not determined, the evidence pointed to weak password control as the cause. The Deputy Commissioner for Personal Data Protection therefore found the Organisation in breach of section 24 of the Personal Data Protection Act 2012.

4. The Organisation is directed to pay a financial penalty of \$8,000 within 30 days from the date of this direction, failing which interest at the rate specified in the Rules of Court in respect of judgment debts shall accrue and be payable on the outstanding amount of the financial penalty until the financial penalty is paid in full. In view of the remedial measures taken by the Organisation, the Commission will not issue any other directions.

5. The Organisation's prompt co-operation in the course of the Commission's investigation and its prompt actions taken to remediate the breach were taken into consideration in determining the quantum of the financial penalty.