



# GUIDE TO NOTIFICATION



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# INTRODUCTION



The Personal Data Protection Act (“**PDPA**”) comprises various rules governing the collection, use, disclosure and care of personal data, including the following obligations:



### **CONSENT**

Organisations may collect, use or disclose personal data only with the individuals’ knowledge and consent (with some exceptions).



### **NOTIFICATION**

Organisations must inform the individuals of the purposes of the collection, use or disclosure of their personal data.



### **APPROPRIATENESS**

Organisations may collect, use or disclose personal data only for purposes that are considered appropriate to a reasonable person in the given circumstances.



### **ACCOUNTABILITY**

Organisations must make information about their personal data protection policies available on request. They should also make available the business contact information of the representatives responsible for answering questions relating to the organisations’ collection, use or disclosure of personal data.



## **PURPOSE OF THE GUIDE**

This Guide aims to illustrate good notification practices for organisations to comply with the Notification Obligation under the PDPA.

You are encouraged to read the Advisory Guidelines on Key Concepts in the PDPA (“**Key Concepts Guidelines**”), in particular, the chapter on Notification Obligation, as well as any other relevant guidelines that the PDPC may issue from time to time.

All examples cited in the Guide are for illustrative purposes only. It should not be assumed that following any of the examples in the Guide would constitute compliance with the PDPA or other laws. Organisations should evaluate their own requirements in light of their obligations under the PDPA.



# WHAT IS A NOTIFICATION?

In this guide, a notification refers to the following:

- a** A notification informs individuals of the purposes for which an organisation is collecting, using or disclosing their personal data.
- b** A notification may also provide other information such as the business contact information of the data protection officer or a representative of the organisation who is responsible for addressing queries regarding the organisation's personal data protection policies, processes for withdrawal of consent and requests for access or correction of individuals' personal data.
- c** The PDPA does not prescribe how organisations should inform individuals of the purposes of collection, use or disclosure of their personal data, or what must be included as part of the notification. Organisations will need to determine the most appropriate form of notification to meet their business needs.



# WHAT TO CONSIDER WHEN DEVELOPING A NOTIFICATION<sup>1</sup>

<sup>1</sup> The list of considerations is not meant to be exhaustive. Please also refer to the respective chapters within the Key Concepts Guidelines for more information on the personal data protection provisions.





## TYPE OF PERSONAL DATA

- Identify who your organisation is collecting the personal data from and tailor the notification to the intended audience.
- Provide information on the types of personal data that will be collected, used or disclosed. Include information about how such personal data will be collected.



## NOTIFICATION AND PURPOSE LIMITATION

- State clearly the purposes of the collection, use or disclosure of personal data.
- Explain whether and why the personal data collected is necessary for your organisation to provide the product or service to individuals.
- Provide information on any third parties whom the personal data may be disclosed to.

www.ABCcompany.com

ABC Company Home About Services Contact

If you would like to sign up to our mailing list to receive the latest promotions, events or to enjoy birthday discounts, please provide your details below.

Name: \_\_\_\_\_

Date of Birth: \_\_\_\_\_

Email: \_\_\_\_\_

Please indicate your area(s) of interest (up to 3):

Interest #1

Interest #2

Interest #3

Submit



Individuals are clearly informed of the purpose for which their personal data is collected, used or disclosed before they provide it.

### ABC Company Terms and Conditions

Your personal data will be used by XYZ Company to deliver the goods you ordered and for all other valid business purposes, in compliance with the law.



It is not clear what "other valid business purposes" refer to.



## CONSENT

- As far as possible, obtain consent from the individuals through positive actions by the individuals for the collection, use or disclosure of their personal data.
- Provide information on how the individuals may withdraw consent for the collection, use or disclosure of their personal data.
- Inform and explain any consequences if consent is withdrawn. For example, where the personal data is necessary to provide a service, a withdrawal of consent to use the data will result in the termination of the service.
- Obtain clear and unambiguous consent in written or evidential form in order to send telemarketing messages to Singapore telephone numbers registered with the Do Not Call (“**DNC**”) Registry.

The screenshot shows a web browser window with the URL www.ABCDE.com. The page header includes the company name 'ABCDE' and navigation links: 'About', 'Categories of Products', 'Forum (Sign-in Required)', and 'Personal Data Protection Policy'. The main content area features a green box with the following text: 'The use of our service is subject to our terms and conditions. Please read through the Terms and Conditions before confirming the following:'. Below this text are two buttons: 'I agree' and 'I disagree and do not wish to proceed.'. The footer contains the text: 'Copyright 2019. All Rights Reserved. ABCDE Pte Ltd. Sitemap | Contact Us'.



This option offers individuals a clear choice whether to agree or disagree/proceed.

**XYZ Company**

**SIGN UP AS OUR MEMBER  
TO ENJOY DISCOUNTS!**

Name: \_\_\_\_\_  
 Mobile No.: \_\_\_\_\_  
 Email: \_\_\_\_\_  
 Address: \_\_\_\_\_

| Please tick if you wish to receive information about promotions and offers by: |                          |
|--------------------------------------------------------------------------------|--------------------------|
| Phone                                                                          | <input type="checkbox"/> |
| SMS                                                                            | <input type="checkbox"/> |
| Email                                                                          | <input type="checkbox"/> |
| Mail                                                                           | <input type="checkbox"/> |

\_\_\_\_\_  
Signature and Date

You can stop receiving such information about promotions and offers in the future by writing to [DPO@xyz.com](mailto:DPO@xyz.com). You may refer to our full personal data protection policy at [http://www.xyz.com/personal\\_data\\_protection\\_policy](http://www.xyz.com/personal_data_protection_policy).



Obtain consent from the individual through a positive action, such as asking the individual to tick his preferred mode of receiving marketing messages.



Clearly state how the individual may withdraw consent from marketing by providing a link or an email address for the individual to opt out.

**XYZ Company**

**APPLICATION FOR XYZ CARD**

Name: \_\_\_\_\_  
 Mobile No.: \_\_\_\_\_  
 Email: \_\_\_\_\_  
 Address: \_\_\_\_\_

**Terms and Conditions**

- Terms and conditions
- Terms and conditions
- Terms and conditions

I hereby declare that all information provided by me in this application is true.

I agree to the collection, use and disclosure of my personal information for all the purposes set out above.

\_\_\_\_\_  
Signature and Date

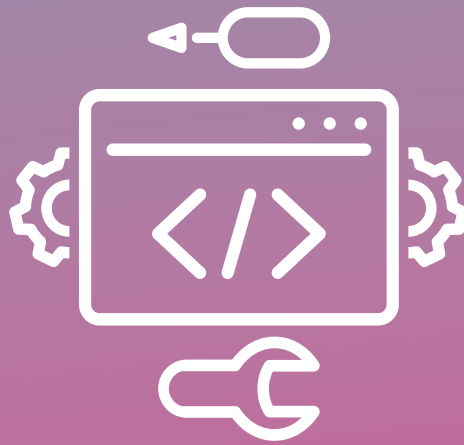


Avoid using pre-ticked boxes to obtain consent from an individual.



## ACCOUNTABILITY

- Provide information on how individuals can obtain more information about the organisation's personal data protection policy.
- Provide information on how individuals may submit queries regarding the organisation's management of their personal data, including the contact information of the organisation's representative responsible for addressing these queries.

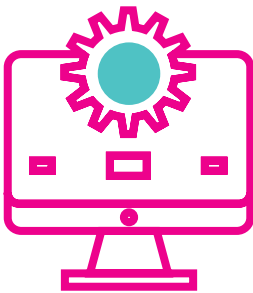


# HOW TO DEVELOP A NOTIFICATION

In developing a notification on the collection, use or disclosure of personal data of individuals, organisations should consider the most effective presentation format, such as layout, location of the notification, and clarity of language used.

A notification can be embedded within a Personal Data Protection Policy displayed prominently so that individuals can easily access it.

If there is a need to obtain fresh consent for new purposes or each time a new purpose comes up, consider using dynamic approaches to obtaining consent such as just-in-time notifications and data protection dashboards. Refer to page 21 for more information.



## LAYOUT

Layout refers to the manner in which the information is arranged. When developing a notification, organisations may wish to take the following actions:

- Highlight **information** that may be **of particular concern** to individuals, such as purposes where personal data will be used or situations where personal data will be disclosed to third parties for specific purposes.
- Use **headings, titles** and **sections** for ease of reading, especially when the notification is expected to convey a lot of information.
- Use a **layered notice** that lists the most important or basic information more prominently. Doing this guides the individuals to see vital information easily.
- Use a **font size that is comfortable** to the eye.
- Manage the **overall length** of the notification by being **clear** and **to the point**.
- Use **visual illustrations**, if necessary, to emphasise or direct readers to important information.

## Examples of notification layouts

### PERSONAL DATA PROTECTION POLICY

Terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions.

1. [Definition of terms used in the personal data protection policy.](#)
2. What types of personal data will be collected?
3. How will the personal data be used?
4. Who will the personal data be shared with?
5. How will the personal data be protected?
6. What should the individual do when he changes his mind about what he had originally consented to?

- 1. Definition of terms used in the personal data protection policy.**  
Definition of Term 1  
Definition of Term 2
- 2. What types of personal data will be collected?**  
Terms and conditions on collection
- 3. How will the personal data be used?**  
Terms and conditions on usage



For web-based notices, the use of hyperlinks provides an overview and allows the reader to directly access specific content.

Headers are used for each section of the notification for clarity.

Text is arranged into neat sections for ease of reading.

### PERSONAL DATA PROTECTION POLICY

Terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions, terms and conditions.



The absence of headers or sections, and the large amounts of text make the notification difficult to read.

The screenshot shows a browser window at www.ABCcompany.com. The notification is titled 'Notice' and contains the following text: 'The information that you provide will assist us in personalising and improving your customer experience using our website. Please refer to our full Personal Data Protection Policy [here](#).' Below the notice is a form with fields for 'Name:' and 'Email Address:'. There are three checkboxes for 'Hobbies and Interests (you can tick more than one)': 'Flower arrangements', 'Cooking and bakery', and 'Knitting and sewing'. Below that, there are three checkboxes for 'I would like to receive the following information via email from ABC company (optional) (you can tick more than one)': 'News on ABC Company's latest programmes and activities', 'Information on our latest product offers and discounts', and 'News and product offers from our partners and vendors'. A note at the bottom states: '(\*We will share your contact information with our partners and vendors)'. A 'Save' button is at the bottom of the form.



Personalised dashboards are used to notify individuals that they can view and modify how their personal data is being collected, used or disclosed.





## LOCATION

When deciding where to place the notification, organisations should consider the medium.

### PAPER DOCUMENTS

- Individuals should be able to locate the notification and corresponding terms and conditions easily.
- For instance, organisations can put the most important information upfront or on the first page of the document.

**COMPANY XYZ LIMOUSINE SERVICES**

**Booking Confirmation**  
 1 x Rental of Car  
 3 Hours \$300

**In-vehicle recording**  
 In-vehicle recording devices will be used for security and safety purposes.

\_\_\_\_\_  
 Signature and Date



The notification clearly states the purpose of recording and is easily located.

**WIN  
\$888  
in cash**

**when you purchase a minimum of  
\$30 worth of XYZ products!**

Name: \_\_\_\_\_  
 Date of Birth: \_\_\_\_\_  
 Gender: \_\_\_\_\_  
 Mobile Number: \_\_\_\_\_  
 Email Address: \_\_\_\_\_  
 Occupation: \_\_\_\_\_



The lucky draw form provides no information about the purposes for which the personal data is collected, used or disclosed, or where such information can be found.

## WEBSITES AND MOBILE INTERFACES

- Check that the design of the notification is suitable for the webpage or mobile interface.
- If there are space constraints, consider putting the most important information upfront and/or indicate hyperlinks to the various sections within the full notification.
- The notification should be accessible with minimal swipes or taps from the landing page.

The image contains five screenshots illustrating notification best practices:

- Top Desktop Screenshot:** A browser window for www.ABCcompany.com with a prominent pink pop-up box that reads "Member Sign-In Required. Please click here to read our personal data protection policy before proceeding." A green checkmark icon is to the right.
- Middle Desktop Screenshot:** A browser window for www.ABCcompany.com with a pink pop-up box that reads "Notice: If you would like to share your email with us for marketing purposes. Please click here." A green checkmark icon is to the right.
- Bottom Desktop Screenshot:** A browser window for www.ABCDE.com with the personal data protection policy text visible on the landing page. A green checkmark icon is to the right.
- Mobile Screenshot 1:** A smartphone screen showing the ABC Company landing page with a pink notification banner at the top. A pink arrow points from this banner to the next screenshot.
- Mobile Screenshot 2:** A smartphone screen showing the full personal data protection policy text, which is formatted with numbered sections and sub-points. A green checkmark icon is to the right.

Accompanying text for each desktop screenshot:

- The alert to the notification in the personal data protection policy is in the form of a pop-up box and located prominently on the website for readers to access.
- The notification is in the form of a push notification immediately before the disclosure of personal data.
- The personal data protection policy is presented on the landing page of the website.

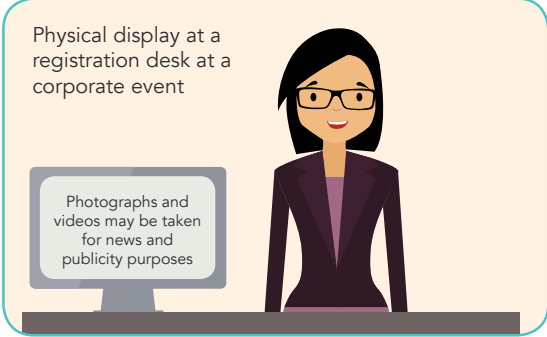
Accompanying text for the mobile screenshots:

- The link to the notification is easy to locate from the landing page.
- Formatting enables the user to easily scroll to read the notification.

## PHYSICAL DISPLAYS

- Notice should be prominently displayed prior to and during the collection, use and disclosure of personal data.
- Notification should clearly state the purpose for collection, use and disclosure of personal data.
- If an organisation is required to collect certain types of personal data because of legislative requirements, this requirement should be clearly stated.

Physical display at a registration desk at a corporate event



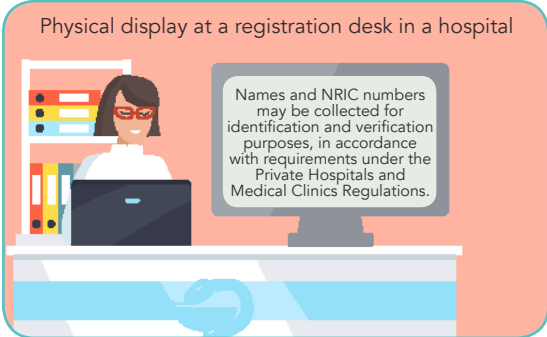
Photographs and videos may be taken for news and publicity purposes

✓

The notification is presented in a conspicuous manner before the personal data is collected.

The purpose is clearly stated.

Physical display at a registration desk in a hospital

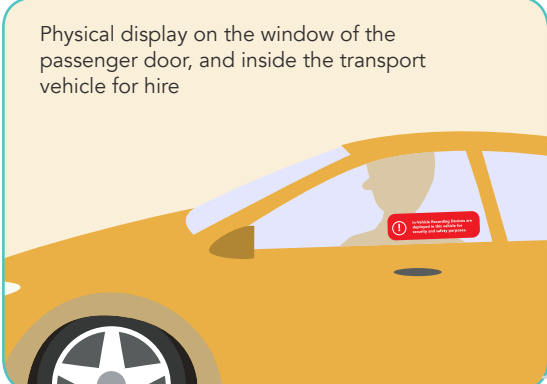


Names and NRIC numbers may be collected for identification and verification purposes, in accordance with requirements under the Private Hospitals and Medical Clinics Regulations.

✓

The collection of specific personal data as a requirement to comply with legislative requirements is clearly stated.

Physical display on the window of the passenger door, and inside the transport vehicle for hire



✓

The notification is displayed on the window of the passenger door such that individuals are aware before they board the transport vehicle for hire, as well as inside the vehicle, such as on the back of the headrests facing the passenger seats.

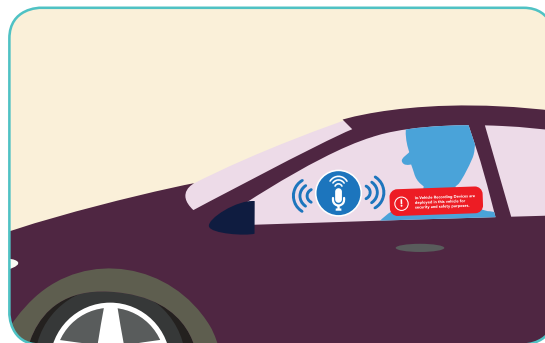
## PHYSICAL DISPLAY TO NOTIFY ON CCTV SURVEILLANCE



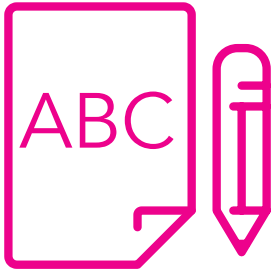
The purpose of CCTV usage is clearly stated.



## AUDIO RECORDING INSIDE A TRANSPORT VEHICLE FOR HIRE



The notification on the audio recording is clearly communicated to the passenger.



## LANGUAGE

Organisations should take note of the following when developing language in notifications:

- Use simple language.
- Keep notifications simple and easy to understand.
- Consider if any details are unnecessary and may be excluded.
- Information should not be misleading.
- Understand the demographics of the intended audience and tailor the notifications to suit the audience profile. For example, use simple language if the service is targeted at children or youth.
- Be as clear, brief and direct as possible.

### Examples of notification language

www.ABCcompany.com

ABC Company Home About Services Contact

**PERSONAL DATA PROTECTION STATEMENT**

Our personal data protection statement outlines our policy and responsibilities on the collection, use or disclosure of your personal information.

**Collection and use of personal information**

- ABC Company collects personal information such as your name, contact number, email address and payment information for purposes of [please list purposes here].
- When you subscribe to ABC Company's mailing list for upcoming events or special promotions, we will ask for your name and email address.
- If you no longer wish to receive promotional materials from ABC Company, you may unsubscribe from our mailing list by emailing us at [email@abccompany.com](mailto:email@abccompany.com), and no further information will be sent to your email address.
- Other terms and conditions.

Copyright 2019. All Rights Reserved.



Simple language is used when explaining the purpose for which personal data will be collected, used or disclosed.

**PERSONAL DATA PROTECTION POLICY**

ABC Company is a company incorporated in Singapore and a member of ABC Group ("The Group"). The Group also includes 123 Limited and 456 Limited and associated companies from time to time. By signing here, you agree to allow the Group to use and process, by any medium, the information given by you which may be acquired throughout the process of this application and via any evidence you submitted in support of this application in order to determine if this application will be approved or rejected.

You agree that in addition to the mode and manner in which the Group may send you notices and communications under the Terms, the Group may send notices and communications as we deem appropriate for the processing of this application to you at your last known address, facsimile and/or telephone/mobile number or electronic mail address in our records (as the case may be).

Your personal information will be processed by us in accordance with the XXX Act 2001 and other applicable laws including the YYY Act 1998 and other relevant regulations that may apply from time to time.

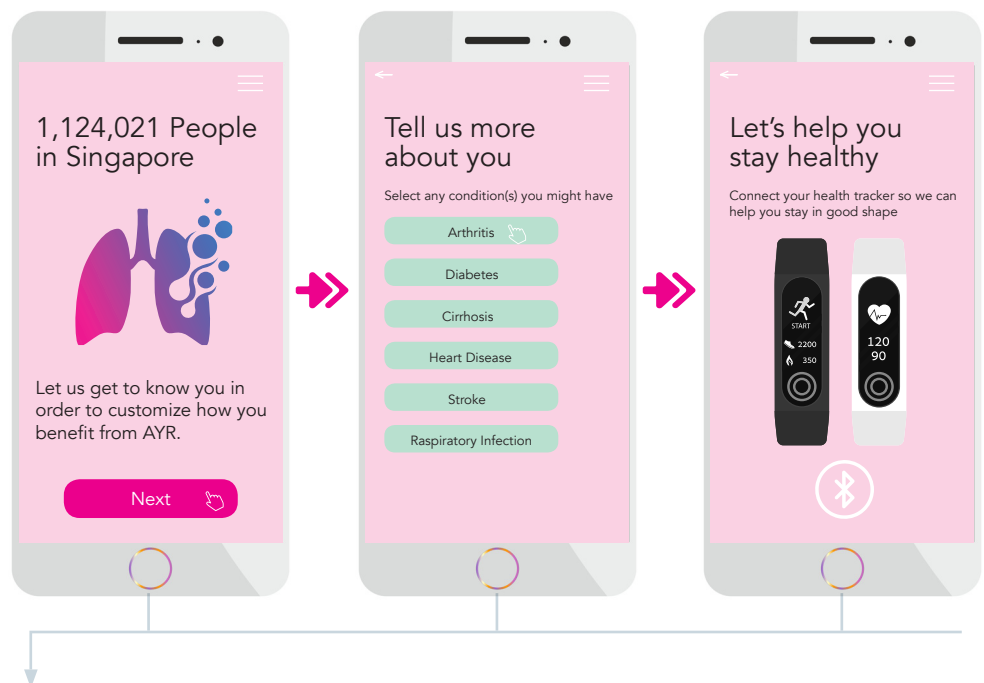


Long sentences are used, which might take readers longer or make it harder for them to understand.

## JUST-IN-TIME NOTIFICATIONS AND DYNAMIC CONSENT<sup>2</sup>

- Consider providing just-in-time notifications, where the necessary information is provided to individuals just before data processing takes place. This is particularly useful for more sensitive types of data such as health-related data.
- Identify the various touch points with customers. For each of these touch points, provide contextualised and relevant information about the data processing such that consent obtained is meaningful.
- Give individuals granular choices, where possible, rather than a single, all-or-nothing choice.
- Where appropriate, consider informing individuals through physical interactions (e.g. customer interacting with a bank teller).

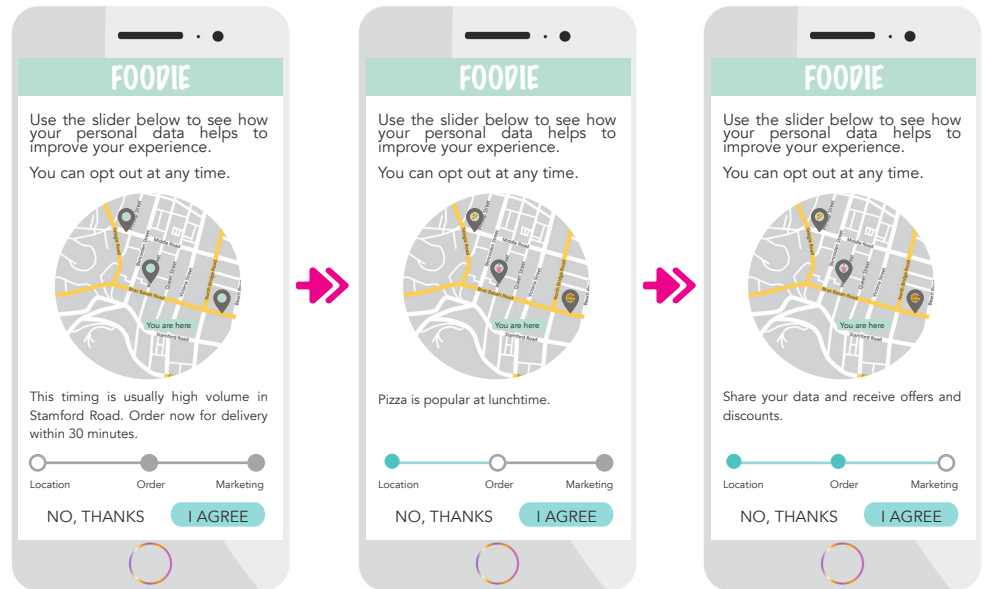
### Examples of just-in-time notifications and dynamic consent



- ✓ Use a factual, step-by-step process to show how personal data will be processed.
- ✓ Provide bite-sized and meaningful information to give context.

<sup>2</sup> Examples in this section adapted from [www.ttclabs.net/event/singapore](http://www.ttclabs.net/event/singapore)

## Examples of just-in-time notifications and dynamic consent

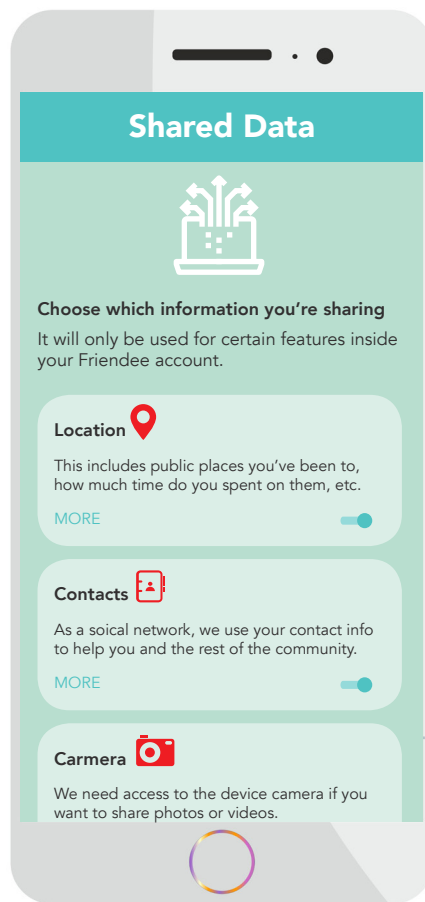


Use a slider interface to guide users through the types of information that are requested by the app.



More detailed information on the benefits can also be provided.





Give granular choices for individuals to make meaningful decisions.



## #SGDIGITAL

Singapore Digital (SG:D) gives Singapore's digitalisation efforts a face, identifying our digital programmes and initiatives with one set of visuals, and speaking to our local and international audiences in the same language.

The SG:D logo is made up of rounded fonts that evolve from the expressive dot that is red. SG stands for Singapore and :D refers to our digital economy. The :D smiley face icon also signifies the optimism of Singaporeans moving into a digital economy. As we progress into the digital economy, it's all about the people - empathy and assurance will be at the heart of all that we do.

BROUGHT TO YOU BY



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