

**WRITTEN VOLUNTARY UNDERTAKING (“Undertaking”)  
TO THE PERSONAL DATA PROTECTION COMMISSION**

This Undertaking is given to the Personal Data Protection Commission or its delegates pursuant to section 48L(1) of the PDPA, by:

**OG Private Limited**

UEN: 196200157H

Registered Address: 60 Albert Street #05-01 OG Albert Complex, Singapore (189969)

(hereinafter referred to as the “Organisation”).

By signing this Undertaking, the above-named Organisation acknowledges the matters stated herein and undertakes to the Commission in the terms set out herein.

**1. DEFINITIONS**

1.1 In this Undertaking:

- (a) “PDPA” means the Personal Data Protection Act 2012; and
- (b) “Relevant Provisions” means the provisions in Parts III, IV, V, VI, VIA and IX, and section 48B(1) of the PDPA.

**2. ACKNOWLEDGEMENTS**

2.1 The Organisation hereby acknowledges the following matters:

- (a) The Commission has carried out investigations into certain acts and practices of the Organisation, and has reason to believe that the Organisation has not complied, is not complying, or is likely not to comply with one or more of the Relevant Provisions. The relevant facts and circumstances are summarised at Schedule A.
- (b) As a result of any non-compliance with the PDPA by an organisation, the Commission has a number of enforcement options under the PDPA, including the option to issue directions under sections 48I or 48J of the PDPA.
- (c) The Commission recognises that the Organisation has made efforts to address the concerns raised in this case and to improve its personal data

protection practices. In addition, the Organisation was cooperative in the course of the investigation and was responsive to requests for information. The Commission further recognises that the Organisation appears ready to implement or is in the midst of implementing the steps set out in Schedule B.

- (d) Having carefully considered all the relevant facts and circumstances, the Commission takes the view that this is an appropriate case in which an Undertaking may be accepted.

- 2.2 The Organisation also acknowledges and agrees that the Commission may publish and make publicly available this Undertaking, and without limitation to the foregoing, the Commission may issue public statements referring to this Undertaking and/or its contents in whole or in part.

### **3. UNDERTAKINGS**

- 3.1 The Organisation undertakes that it has taken, or will take all necessary steps, to carry out the actions or refrain from carrying out the actions referred to in Schedule B, and where applicable, in accordance with the stipulated timelines.

### **4. COMMENCEMENT**

- 4.1 This Undertaking shall take effect upon the acceptance by the Commission of the Organisation's duly executed Undertaking.

### **5. THE COMMISSION'S STATUTORY POWERS**

- 5.1 In order to provide the Organisation with an opportunity to complete all necessary steps to implement its undertakings set out in clause 3 above, the Commission will exercise its powers under section 50(3)(ca) of the PDPA to suspend the investigations referred to in clause 2 on the date the Undertaking takes effect as set out in clause 4.1.

- 5.2 The Organisation acknowledges that the Commission will verify the Organisation's compliance with its undertakings set out in clause 3 above, and if necessary, will exercise its powers under the Ninth Schedule of the PDPA to do so.

- 5.3 Clause 5.1 above shall be without prejudice to the Commission's statutory powers to conduct or resume, at any time, the investigations referred to in clause 2 above if it thinks fit, including but not limited to the situation where the

Organisation fails to comply with this Undertaking or part thereof in relation to any matter.

- 5.4 Nothing in this Undertaking, including the Commission's acceptance of the Undertaking, is intended to, or shall, fetter or constrain the Commission's rights and statutory powers (including but not limited to those under sections 48I, 48J, 48L(4) and 50 of the PDPA) in any manner. Neither shall be construed as creating any anticipation or expectation that the Commission will take or not take any particular course of action in the future (whether in the present case or in respect of any other case concerning a breach or suspected breach of the PDPA). The acceptance of this Undertaking is strictly confined to the particular facts of the present case, and is made on the basis of the representations and information provided by the Organisation. The acceptance of an Undertaking in this case shall not be construed as establishing any precedent.

## **6. VARIATION**

- 6.1 This Undertaking may be varied only with the express written agreement of the Commission.

This document has been electronically signed. The Parties hereby affirm that the electronic signatures have been affixed with the due authorisation of each Party and that Parties intend for the electronic signatures to carry the same weight, effect and meaning as hand-signed wet-ink signatures.

SIGNED, for and on behalf of )

**OG Private Limited** )

By the following: )

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

Designation: \_\_\_\_\_ )

Date: \_\_\_\_\_ )

ACCEPTED by )

)

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

Designation: Deputy Commissioner/Commissioner  
Personal Data Protection )

Date: \_\_\_\_\_ )

# **SCHEDULE A**

## **SUMMARY OF FACTS**

1. On 4 January 2022, OG Private Limited received emails from Desorden Group stating that personal data have been stolen and demanded a ransom of USD\$90,000 in return for not publishing the stolen data.
2. It was identified that a threat actor had conducted a Bruteforce SQL Injection attack and was able to download 3 databases. As a result of the attack, the personal data of the Organisation's approximately 276,677 individuals including their name, gender, address, date of birth, email address, telephone numbers, NRIC numbers (encrypted) and passwords (encrypted) could have been affected.

## **SCHEDULE B**

S/N	Item	Status	Target Completion (MMM-YY)
1	<p>SQL Injection Prevention Enhancement</p> <p>Strengthened the existing SQL injection code to prevent future brute force SQL injection attacks.</p>	Completed	Jan-22
2	<p>Additional IP Blocking Measure</p> <p>To further shorten the lead-time for blocking suspicious traffic, the system was upgraded to automatically block any IP generating 50 or more connections per minute at any time. With this implementation, there are now 2 levels of checking/blocking.</p> <p>First, the system will automatically block suspicious traffic. Second, the system continues to send suspicious activity alerts to our vendors' 24/7 duty team who will investigate and respond appropriately.</p>	Completed	Jan-22
3	<p>Data Security Enhancement:</p> <p>After the attack, we increased the security of the personal data in the database:</p> <ul style="list-style-type: none"> <li>i. Encrypted member names</li> <li>ii. Encrypted email addresses</li> <li>iii. Encrypted mobile phone numbers</li> </ul>	Completed	Jan-22



4	<p><b>Streamline Data Storage</b></p> <p>We made changes to our membership program to enable further reduction in the types of personal data that we collect and store:</p> <ul style="list-style-type: none"> <li>i. Deleted member dates of birth from the server</li> <li>ii. Deleted member NRIC numbers from the server</li> </ul>	Completed	Jan-22
5	<p><b>Immediate Password Security Measure</b></p> <ul style="list-style-type: none"> <li>i. Changed system setting to force members to reset their passwords on next login.</li> <li>ii. Changed passwords for all online databases and cloud-based services.</li> </ul>	Completed	Jan-22
6	<p><b>Tighten System Security</b></p> <p>Comprehensive security review including:</p> <ul style="list-style-type: none"> <li>i. Carrying out Vulnerability Assessment and Penetration Testing (VAPT)</li> <li>ii. Updating and patching server software</li> <li>iii. Installing or updating appropriate computer security software (including virus checking)</li> </ul>	In progress	Jun-22
7	<p><b>Harden Web Portal Security</b></p> <p>Implement reCAPTCHA to detect abusive traffic and prevent brute force attack</p>	In progress	Jul-22
8	<p><b>Additional Data Security Enhancement:</b></p> <p>Encrypt member address. The data encryption algorithm is AES-256 algorithm with secret key</p>	In progress	Aug-22

9	<p>Implement Annual System Security Review</p> <p>Establish SOP for annual security review and Vulnerability Assessment and Penetration Testing (VAPT)</p>	On-going	On-going
10	<p>Hardening of Website Security</p> <p>In additional to AWS Firewall on server level, will implement additional Firewall on application level to harden the security.</p>	In progress	Sep-22
11	<p>Implementation of Two-Factor Authentication</p> <p>Two-Factor Authentication (“2FA”) will be implemented for all admin users login.</p>	In progress	Oct-22
12	<p>Tighten Protocols for Contracting with 3<sup>rd</sup> Party Vendors</p> <ul style="list-style-type: none"> <li>i. Vendor selection due diligence</li> <li>ii. Checklists for IT vendors providing IT solutions</li> <li>iii. Checklists for vendors processing personal data</li> <li>iv. SOPs for 3<sup>rd</sup> parties handling personal data</li> <li>v. Review contract terms and conditions for adequate protection and risk management, and compliance with data protection regulations.</li> </ul>	In progress	Nov-22

13	<b>Inhouse PDP review and implement PDP Training</b>  Engage PDP consultant firm to review existing data protection protocols and implement SOP for ongoing training of employees and/or associates in handling of personal data and ensuring data security.	In Progress	Nov-22
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