



PERSONAL DATA
PROTECTION COMMISSION
SINGAPORE

**Annual Report
2015/16**



THE PDPC MISSION

To promote and enforce personal data protection

so as to foster an environment of trust among businesses and consumers, contributing to a vibrant Singapore economy.

PROTECTING DATA



BUILDING TRUST

Bit-by-Bit

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CHAIRMAN'S MESSAGE

Appreciation for the Personal Data Protection Act (PDPA) among organisations and consumers is on the rise. This is apparent from the PDPC annual surveys conducted early last year, where nearly 80% of the organisations surveyed indicated awareness of their obligations under the PDPA. This marks an increase from the previous year's results. It is also encouraging to know that a majority of the organisations surveyed have security measures in place to protect personal data, and are proactive in checking against the DNC Registry before making telemarketing calls or sending telemarketing messages to consumers.

The surveys also revealed a heightened understanding of the PDPA amongst consumers, with many viewing the PDPA and DNC Registry as effective in helping individuals gain more control over their personal data and protecting the information from misuse. The positive impression shows an increasing level of trust, and could have led to the relatively higher comfort levels of consumers in sharing their personal data.

While we are encouraged with the current development, we will not rest on our laurels. With data becoming the new currency of today, a robust data protection regime is crucial for the country to keep with the times and stay relevant.

The transition from the Infocomm Development Authority (IDA) to the Infocomm Media Development Authority (IMDA) in October 2016, and the integration of PDPC into the IMDA structure, is thus a timely development that will enable Singapore to have a holistic approach in achieving its Smart Nation vision. PDPC will continue as a cross-sector regulator, operating as part of IMDA to ensure that data protection regulations and government data policies are in sync. Data protection is a lynchpin that contributes to the establishment of an environment of trust, on which our Smart Nation services can rest on.

From Compliance to Accountability

Both 2015 and 2016 proved to be yet another important year for PDPC in terms of enforcement decisions and actions. At the end of September 2016, 18 organisations were found to have key lapses in their data protection measures – one key lapse being inadequate data security measures implemented, which resulted in the leaks and loss of thousands of individuals' personal data. Another was the failure in obtaining consent for the collection, use and disclosure of personal data. PDPC publishes its decisions for all cases where breaches are found, as part of our commitment to transparency and to explain our decisions. This is also intended to help organisations understand the policies and application of the PDPA.

Such enforcement actions drive home the message of the importance of personal data protection for organisations. At the same time, it also firmly plants the notion of PDPC's commitment in ensuring that individuals' personal data will not be misused by organisations in their pursuit of business competitive advantage.

One should note that the enforcement actions are not intended to prohibit the sharing of data, but to encourage organisations to use data responsibly. More importantly, it is meant to facilitate a shift from a compliance mindset to one where the organisations adopt an accountability approach in personal data protection. For organisations, a Data Protection by Design approach is a useful operation model that will enable the optimal balance between use of data and safe handling practices, thereby realising the full benefits of data sharing for both organisations and individuals.

Engagement Efforts

Both the surveys and enforcement decisions played a vital role in helping the Commission recognise that some organisations require more practical guidance in complying and attaining accountability in their business processes. They also helped PDPC to identify sectors and areas in which organisations require help in enhancing their data protection measures.

For the past two years, PDPC has ramped up its outreach efforts and the issuance of new advisory guidelines and guides. It has developed new initiatives and made improvements to current ones, so as to assist organisations along their data protection journey. As part of a larger initiative, PDPC has also used various media platforms such as posters, online advertisements and an info-educational television series. These have helped to emphasise the importance of personal data protection to all organisations across multiple channels.

Awareness of consumers' expectations in personal data protection is also an essential step towards trusted data sharing. In the past two years, we have reached out to individuals of different age groups through events such as the annual Silver IT Fest and Lab on Wheels programme, the Consumer Association of Singapore's (CASE)

annual World Consumer Rights Day, and social media publishing. Their roles and rights in safeguarding their personal data are accentuated through these avenues. More importantly, we want to educate them on the opportunities and risks in place so that they can make informed decisions in sharing their personal data with organisations.

I am pleased to share that there are concrete plans in development for the next two years to focus on enhancing the competency of Data Protection Officers (DPOs) and enabling organisations to build data protection capabilities. DPOs are vital in inculcating a data protection culture in organisations. With this in mind, the aim is to elevate and professionalise the work of DPOs so that data protection can be pursued as a career.

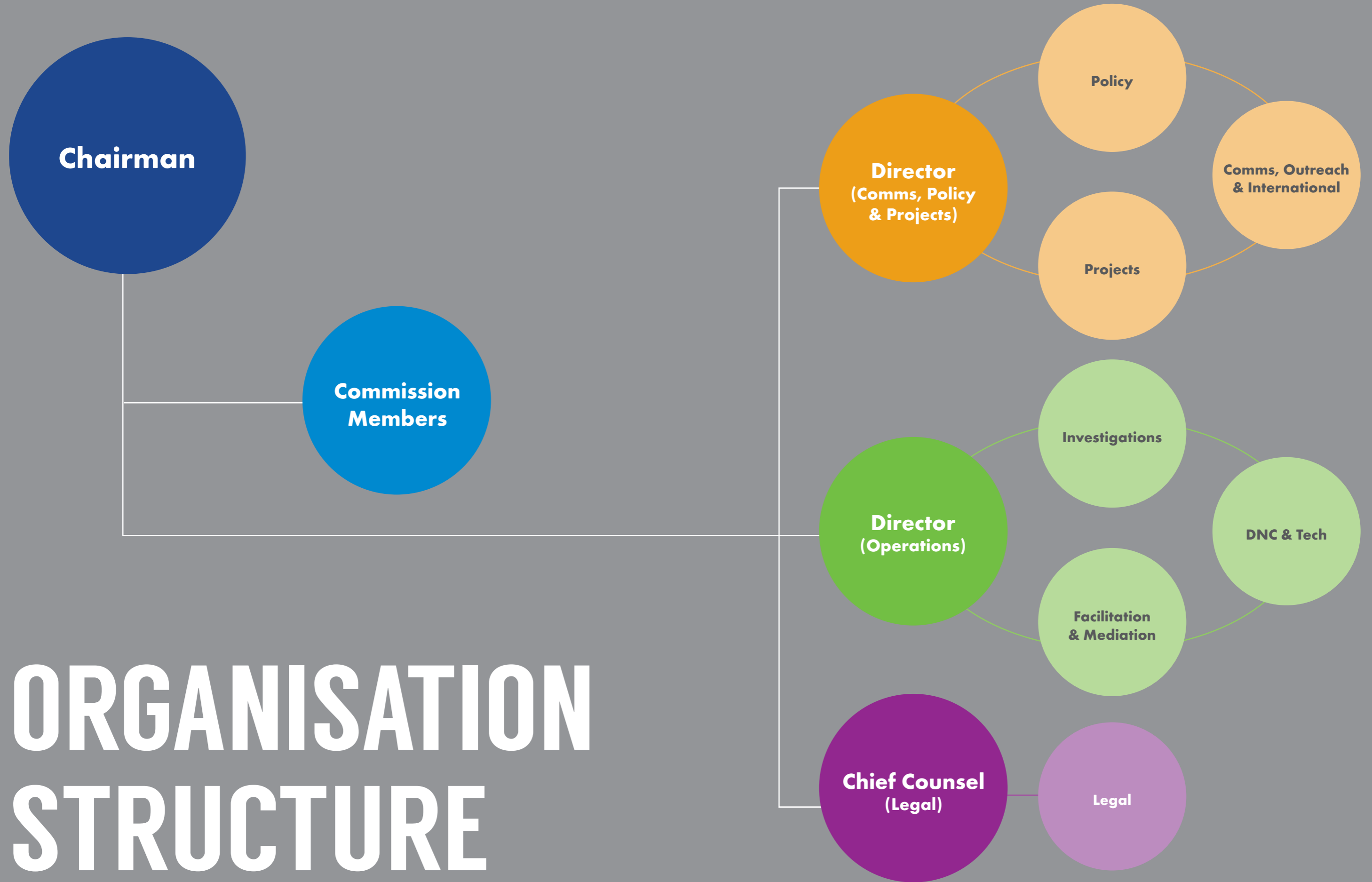
With cross-border data flow becoming a common phenomenon, we are proactively devising areas to help organisations raise their data protection standards. This is to enable them to compete regionally and internationally with foreign businesses, while still adhering to high data protection benchmarks. We are also looking to partner with more organisations, as well as working on deepening our current collaborations, to take on more initiatives for consumer education.

“

PDPC will continue its efforts in entrenching trust between organisations and consumers within an interconnected environment driven by innovation to optimise the social and economic benefits of data sharing.

”





ORGANISATION STRUCTURE



Mr Yeong Zee Kin
Assistant Chief Executive,
Personal Data Protection Commission

Chairman

Mr Leong Keng Thai
Chairman, Personal Data Protection
Commission & Deputy Chief
Executive, Infocomm Development
Authority of Singapore



Ms Aileen Chia
Assistant Chief Executive and
Director-General (Telecoms and
Post), Infocomm Development
Authority of Singapore



Ms Ong Seok Leng
Senior Director, Governance
Group, Infocomm Development
Authority of Singapore

Mr Ong Tong San
Cluster Director, Competition
and Resource Development,
Infocomm Development
Authority of Singapore (IDA)



COMMISSION MEMBERS



Chairperson
Ms Liew Woon Yin
Director, Abundanti



Mr Hui Choon Kuen
Deputy Chief Counsel (Advisory), Civil Division, Attorney-General's Chambers & Dean, AGC Academy



Mr Effendy Ibrahim
Marketing Director, Asia & Japan, Veeam Software



Mr Lam Chee Kin
Managing Director & Head, Group Legal, Compliance & Secretariat, DBS Bank Ltd



Professor Simon Chesterman
Dean, Faculty of Law, National University of Singapore



Mr Ho Meng Kit
Chief Executive Officer, Singapore Business Federation



Ms Tina Hung
Deputy Chief Executive Officer and Group Director, Service Planning & Development and Advocacy & Membership, National Council of Social Service



Mr Lim Biow Chuan
President, Consumers Association of Singapore



Mr Lim Chin Hu
Managing Partner, Stream Global



Associate Professor Low Cheng Ooi
Chief Medical Informatics Officer, Ministry of Health & MOH Holdings

ADVISORY COMMITTEE



Professor Steven Miller
Vice Provost (Research) and Professor, Information Systems (Practice), Singapore Management University



Mr Poon Hong Yuen
Chief Executive, SPRING Singapore

2015

May
2015

Guide to Managing Data Breaches

The guide was released to help organisations deal with data breach scenarios.



Guide to Securing Personal Data in Electronic Mediums

The PDPC introduced the guide to provide advice on the steps that organisations need to take to protect digitally stored personal information.

Advisory Guidelines on Requiring Consent for Marketing Purposes

Advisory Guidelines on Requiring Consent were issued by PDPC for entities that perform marketing functions.

Sample Clauses on Obtaining and Withdrawing Consent

The PDPC produced Sample Clauses for organisations to collect, use and disclose personal information for sending marketing materials to the individual.

Launch of PDP Toolkit

The PDP toolkit consisted of initiatives that were aimed at helping organisations to comply with the PDPA.

Privacy Awareness Week

PDPC launched a series of activities in the Privacy Awareness Week, to promote awareness of privacy and personal data protection issues.



3rd PDP Seminar, 'Securing Personal Data for a Competitive Edge'

Attended by 650 corporate representatives, the event gave insights on global data protection challenges and strategies in the digital economy, and the preservation of integrity in the Big Data age.

MILESTONES

2016

**June
2015**

Legal Advice Scheme

A joint effort between the PDPC and the Law Society of Singapore to provide legal advice to SMEs regarding their compliance with the PDPA.



Data Protection Officer (DPO) Connect

A regular e-newsletter was launched to keep DPOs informed of personal data protection matters, learn about good practices from others, and understand compliance better.



Read online at <https://goo.gl/cEboLA>

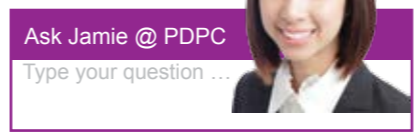
**August
2015**

E-Learning Corporate Account

Organisations with a Corporate Account can use the PDPC e-learning programme as a corporate training tool to equip their employees with up-to-date knowledge of the PDPA.



**March
2016**



Launch of 'Ask Jamie'

Jamie is PDPC's automated 24/7, virtual assistant found on both the PDPC and DNC websites, to help users to find quick answers.

**April
2016**

First Batch of Enforcement Decisions

Published as a reminder to organisations to exercise due care and implement adequate security measures when managing personal data, the decisions of the cases range from a warning to directions, including a financial penalty.

Advisory Guidelines on Enforcement for Data Protection Provisions

The guidelines are aimed at providing clarity to the industry on PDPC's interpretation of enforcement on data protection provisions under the PDPA.



PDPC's LinkedIn Page Goes Live

This increases PDPC's presence on social media, and provides a platform to facilitate disseminating news and updates on the PDPA and data protection in general.



Connect to <https://goo.gl/agyXff>

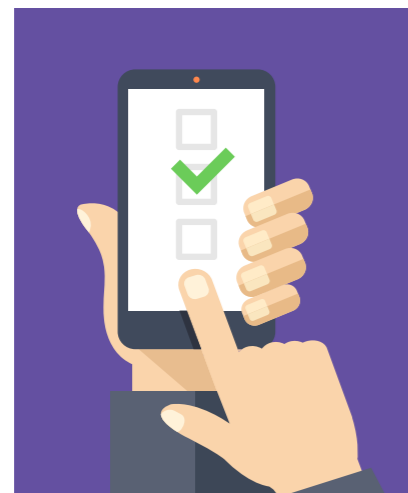
The Global Privacy Enforcement Network (GPEN) Sweep 2016

PDPC participated in the GPEN Sweep for the first time in April 2016. An initiative aimed at encouraging organisations to comply with data protection legislations and to enhance cooperation between data protection authorities globally, this year's theme centres on the Internet of Things (IoT), with a focus on accountability.

**June
2016**

Guide on Handling Access Requests

This guide helps organisations to develop comprehensive policies and processes for handling access requests.



**July
2016**

Guide on Building Websites for SMEs

Organisations need to be aware of their obligations under the PDPA, particularly if their websites are used to collect, use, disclose, and store personal data, like customer and payment details.

Guide to Disposal of Personal Data on Physical Medium

This guide pertains to the handling and disposal of personal data that is stored on a physical medium, such as paper and other read-only storage media like CDs and DVDs.

Guide on Data Protection Clauses for Agreements Relating to the Processing of Personal Data

This applies to organisations that engage another entity to provide services relating to the processing of personal data (e.g. hosting or storing data, and payroll processing).

**October
2016**



Hosting of 45th APPA Forum in Singapore

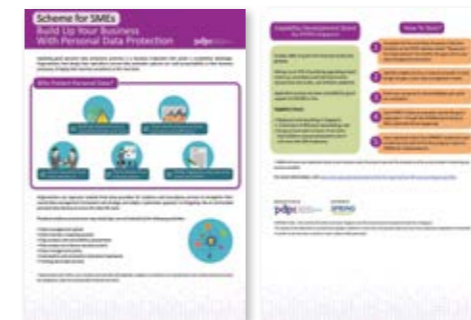
About 50 APPA members, invited observers and guests from more than 13 jurisdictions attended the two-day event, to exchange ideas and engage in constructive discussions on personal data protection and privacy trends and developments.

4th PDP Seminar, 'Bridging Innovation and Trust'

The seminar was one of a string of data protection events during the week, and saw the involvement of well-established international data protection authorities from Asia-Pacific, Europe and the U.S.

Launch of Capability Development Grant (CDG)

The CDG helps SMEs by defraying up to 70 percent of qualifying upgrading project costs.



'Your Personal Data, Our Responsibility'

PDPC's inaugural four-part television information-education series was broadcast on free-to-air television.

DPAC MEMBERS' VIEWS ON SINGAPORE'S DATA PROTECTION LANDSCAPE



Ms Liew Woon Yin,
Chairperson of DPAC and
Director of Abundanti



Mr Lam Chee Kin,
Managing Director & Head of Legal,
Compliance and Secretariat of DBS Group



Professor Steven Miller,
Vice Provost (Research) and Dean of SMU's
School of Information Systems

Ms Liew Woon Yin, Mr Lam Chee Kin and Professor Steven Miller commented on their roles in DPAC and data protection issues in Singapore's evolving landscape.

What do you think about your role as a DPAC member?

Ms Liew Woon Yin DPAC members represent the business, banking, healthcare, IT, public and social services sectors and academia. We contribute our diverse views and perspectives to the PDPC on matters relating to the development and administration of the personal data protection framework. This is to ensure transparency, clarity and consistency in the administration of the legislation. My role as Chairperson of the PDAC is to ensure that all issues surfaced for discussions are given due consideration and that there is general agreement in any recommended approach.

Mr Lam Chee Kin My role as a DPAC member is tremendously satisfying. Taking into consideration views from the various sectors in the engagement and decision-making process of the PDPC is important. It ensures that Singapore develops its data protection framework in a way that is appropriate to our circumstances. And on my part, I hope to effectively supplement that work with the perspective of the financial sector.

Professor Steven Miller I strongly believe in the importance of a national Data Protection Advisory Committee (DPAC). I find the committee sessions and background briefings to be exceptionally interesting and useful, and I am enthusiastic about committing my time and effort to being an effective DPAC member.

Why did you agree to continue your term in DPAC?

Ms Liew Woon Yin Protection of personal data is still a fairly new subject in Singapore as the PDPA only came into force in 2014. I am keen to contribute to the development of the personal data protection framework, look into its challenges and issues, and balance implementation. Furthermore, the enthusiasm of the DPAC members and their insightful comments make the role so much more constructive and interesting.

Mr Lam Chee Kin On a personal front, it is stimulating and somewhat humbling to be surrounded by so many highly qualified colleagues from different industries. Professionally, I am encouraged by the commitment of DPAC and the PDPC to robustly analyse and debate on policy positions and enforcement decisions. I think our efforts so far will put us in good stead in time to come.

Professor Steven Miller The DPAC meetings are very insightful and constructive. Comprising a diverse group of people, each with very relevant and extensive professional experience, the DPAC members have much to say. We are not shy about expressing our views on matters that the PDPC would like us to advise on. We have raised multiple alternatives to suggestions put forward by the PDPC; we have brought forth many important considerations pertaining to the nature of important trade-offs that are applicable to a particular issue that we are considering.

Personally, I learn a lot from each of the DPAC meetings. More importantly, the PDPC receives useful, thoughtful and sometimes challenging inputs from DPAC. This is a good thing. It results in all of us – both PDPC and DPAC members – thinking more clearly and deeply about the issues and cases we review. For these reasons, I think DPAC plays an important role in the larger overall effort to create a culture and governance structure for personal data protection, that are both progressive as well as pragmatic.

Describe how the PDPA has changed your industry in Singapore.

Ms Liew Woon Yin There is increasing awareness in the business sector that data regulatory compliance is now something they have to take into account, even though there may be confusion among some regarding the implementation. Anecdotally, the departments in some organisations are looking at personal data protection purely from a departmental viewpoint (in silo) rather than holistically from the organisational perspective. It is an indication of a lack of understanding of the context of the legislation.

However, it is heartening to note from the industry survey conducted by the PDPC in 2015 – to gauge the awareness and sentiments of organisations towards the PDPA – that responses were generally positive. The organisations surveyed (more than 1,500 companies from various industry sectors and of different sizes) are cognisant of the benefits that data protection brings to consumers and organisations, and in strengthening Singapore's position as a trusted hub and choice location for data hosting and processing activities.

Mr Lam Chee Kin The financial sector is subjected to strict regulations in areas such as customer confidentiality and technology/operational risk management. The PDPA forms an important subset of the broader category of information and technology risk management, and warrants some refinement in the data protection policies and processes already in place.

Professor Steven Miller I am part of SMU, one of Singapore's newer national autonomous universities. Universities require any type of research work involving 'human subjects' to be reviewed by an Institutional Review Board (more popularly referred to as a research ethics committee), which may be separate or set up within the university. Internationally, there are well-established guidelines for how an Institutional Review Board within a research organization (including a university), should vet a research proposal involving human subjects. This includes considering when informed consent from the research subject is required and the proper means of gaining that consent. It is also necessary to look at situations that may require exceptions to standard approaches, for getting informed consent for data gathering and usage.

In my view, there is much synergy in terms of content and spirit between the PDPA and the approach of an Institutional Review Board. This is in respect to ensuring the ethical and proper treatment of personal data in research projects involving human subjects. My view is that the PDPA has made it easier to motivate the university community of faculty, staff and students to be interested in learning about research ethics in general; and the specifics of Institutional Review Board requirements in particular.

In your opinion, what are some of the issues facing Singapore that are pertinent to data protection?

Ms Liew Woon Yin The implications of Big Data, Internet of Things and Cloud Computing. Companies have to ascertain that adequate consent is given prior to data collection. They also need to ensure that there is clarity in what user information is collected and how it will be used. With cloud computing, the primary issue lies with the legal challenges with cross-border data transfers and data protection across countries.

Take ASEAN for example. Different data protection laws across ASEAN countries, means that it can be problematic for companies engaging in cross-border data transfers to comply. Malaysia, Philippines and Singapore have data protection legislation in place but the rest of ASEAN does not. The establishment of the ASEAN Economic Community on 1 January 2016 reflects the recognition of the importance of cooperation and protecting personal data, in the information trade and flow amongst ASEAN member states. Member countries have agreed to develop best practices or guidelines on data protection (but not to legislate), as part of their commitment to establish an integrated ASEAN Economic Community.

Singapore will need to work with its ASEAN partners to provide specific guidelines and minimum standards of data protection, and ensure that compliance costs are not prohibitive.

Mr Lam Chee Kin I am quite confident that we will strike the right balance for Singapore in terms of safeguarding individuals' personal data, while continuing to be an ideal place for business and innovation. The issue is when Singapore data protection requirements intersect and interact with the laws of other countries. From an implementation perspective, data protection officers (DPOs) may have to wrestle with the varying laws of multiple countries, when the reality is that technology and business have transcended jurisdictional borders. That will be my immediate concern.

Looking forward and given our stated vision towards the building of a Smart Nation, I think we will have to deal more with trends such as the increased leveraging of big data, the rise of the Internet of Things, and the growing ubiquity of biometrics for authentication. Advances in these areas (coupled with changes in the behaviours and expectations of customers) may require a rethink of the way core data protection principles work, how data protection consents are obtained (or how necessary they are in different contexts) and the way data is secured.

Professor Steven Miller I am glad that Singapore has taken a proactive approach towards the protection of personal data, while adopting a pragmatic approach that sensibly considers the needs of the multiple types of stakeholders. There are natural differences in the perspectives and interests of the various stakeholders (individuals, business organisations, non-profit organisations, government) involved in the ecosystem of personal data generation, collection and protection. These could result in disagreement. The challenge is in sorting out the differences in specific contexts, such that the operating environment remains robust, while personal data is protected.

An active and strong DPAC is therefore an important component in making this work.

It has been a fruitful year for PDPC, as we directed various initiatives to raise the level of personal data protection in our society.

> Promoting Compliance

> Speaking To Industry

HIGHLIGHTS



PROMOTING COMPLIANCE

Our endeavours in enforcement and education have paid off, with a visible drop in complaints and healthier organisational data protection practices.

Policing The Industry

At PDPC, the main enforcement objective is to promote compliance of the PDPA among organisations. Not only do we take action against errant organisations, the enforcement also spreads the importance of proper personal data protection management on the ground.

2016 was the first year since the PDPA came into full force that we published the Commission's Decisions. As of end September 2016, we had published 16 Grounds of Decisions, with penalties ranging from a warning for a minor breach to directions and financial penalties for a major breach.

The decisions involved a couple of high-profile breaches that were reported in the media prior to PDPC's investigations, as well as some minor ones, all of which provided learning values to other organisations. A majority of these breaches resulted from the lack of adequate IT security measures, and the role of the data intermediary was also prominent.

"Some organisations adopt a passive attitude and start paying serious attention to compliance only after a lesson has been learned. When a breach occurs, customers are usually the ones affected because their personal data is leaked or disclosed, which is the bigger issue. Therefore, our efforts have been to encourage such organisations to adopt a more proactive mindset, to prevent problems from occurring in the first place," said Mr Yeong Zee Kin, Assistant Chief Executive, PDPC.

The desired outcome is for the landscape to transit from organisations simply focusing on compliance, to organisations realising the benefits of taking greater accountability over personal data protection.



The personal data of some 317,000 members of K Box Entertainment Group (K Box), a well-known karaoke chain, was leaked through a website which allowed members of the public to post and share text online publicly. Apart from having inadequate data protection policies, K Box also did not appoint an officer to oversee PDPA compliance, which is a mandatory requirement under the PDPA. For these offences, K Box was issued directions and a financial penalty of \$50,000, PDPC's heftiest penalty to date, whilst the data intermediary responsible for K Box's database management, Finantech Holdings, was fined \$10,000.

In another case, the data intermediary of Challenger Technologies (Challenger), an IT retailer, had sent out an email update on Challenger's behalf to over 165,000 of its members regarding the status of their membership points. However, the emails were sent to the wrong recipients, resulting in each Challenger member receiving the information of another member. While Challenger took immediate steps to rectify the mistake, Challenger and its data intermediary, Xirlynx Innovations, were issued a warning for failing to put in place proper procedures to protect personal data.

As of end September 2016

910,310

Consumer Numbers Registered

6,650

Organisation Accounts Created

1.31 billion

Numbers Checked by Organisations

Decline In DNC Offences

DNC provisions came into force six months earlier than the data protection provisions, and two major cases were published in 2014.

The number of DNC-related complaints since then, has fallen sharply from 7,800 cases per year to 2,200 within the span of 18 months.

This achievement is largely the result of the increased awareness to obtain consent for marketing purposes. PDPC has been actively reaching out to organisations to help them understand the importance of seeking the consent of individuals and checking their lists of telephone contact numbers against the DNC Registry, before sending telemarketing messages to consumers.

To help mitigate costs for organisations, the PDPC also offers a given number of credits for each main account annually, which they can use to perform telephone number checks with the DNC Registry.

Benefitting From Compliance

There are intrinsic benefits that come with complying with the PDPA. If customers' personal data is compromised, organisations tend to lose reputation and goodwill, resulting customer and revenue losses. This was observed from the media attention shone on the enforcement cases.

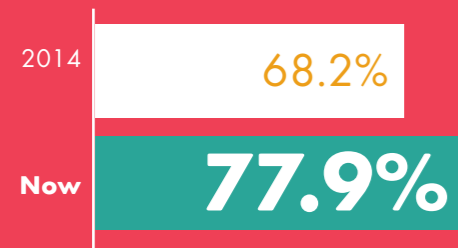
Customers would be more confident transacting with organisations that are responsible enough to protect personal data. In addition, the adoption of appropriate personal data protection measures can help organisations enhance workflows, boost operational efficiencies and strengthen their processes by helping to plug the gaps and tackle risks that could cause costly breaches.

Increasingly, organisations are realising that owning a shorter list of 'consented contacts' is far more valuable than a longer unprocessed list. It enhances and focuses their marketing efforts, since the messages and calls received by consumers are likely to be more receptive. At the same time, organisations end up spending less on telemarketing that yield low returns.



REACHING OUT TO INDUSTRY, FACILITATING UNDERSTANDING

Awareness of Data Protection Obligations



Sectoral Awareness of PDPA

HIGHEST

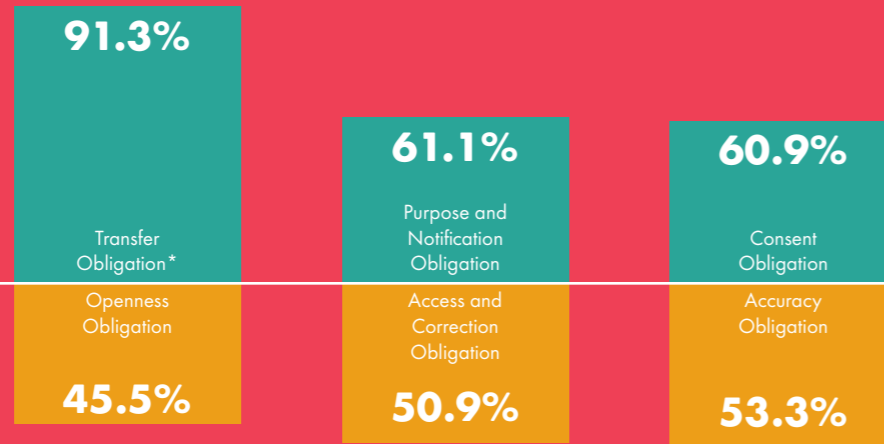
Social Services, Employment, Telemarketing, as well as Arts, Entertainment and Recreation industries.

LOWEST

Wholesale and Retail Trade, and Transportation and Storage industries.

Top 3 Obligations

Highest Compliance



Areas For Increasing Compliance

*Only for organisations that transfer data overseas



Organisations agreed that PDPA is beneficial for consumers.



Organisations believed that PDPA is beneficial for their organisations.



Believed that benefits derived from complying with the PDPA outweigh the cost of compliance in the long run.

SPEAKING TO INDUSTRY

Seminars and exhibitions are some of the channels that the PDPC leveraged on to facilitate greater awareness and better understanding of personal data protection challenges and strategies.



The Personal Data Protection (PDP) Seminar

The PDP Seminar 2016, which took place on 20 July at the Raffles City Convention Centre, saw a turnout of close to 800 participants hailing from sectors ranging from finance, employment, healthcare to Voluntary Welfare Organisations (VWOs). Besides providing insights into the opportunities and challenges of moving data across different sectors in a Smart Nation and Internet of Things (IoT) environment, topics discussed at the event also delved into how initiatives such as Privacy Impact Assessment, Privacy by Design and Privacy Management Programme, can help address the challenges of an increasingly complex data ecosystem.

The seminar was one of a string of data protection events held in Singapore during that week, and in particular, saw the involvement of well-established international data protection authorities from Asia-Pacific, Europe and the U.S.

PDP Seminar 2015 was held on 8 May at the Ritz-Carlton, under the theme 'Securing Personal Data for a Competitive Edge'. Attended by about 650 corporate representatives, the event gave insights on global data protection challenges and strategies in the digital economy, and how integrity can be preserved in the age of Big Data.

Gracing the event were Mr John Edwards, Privacy Commissioner of the Office of the Privacy Commissioner, New Zealand, who was the keynote speaker; and Dr Yaacob Ibrahim, Minister for Communications and Information, who was the Guest-of-Honour. The half-day seminar concluded with a post seminar appreciation lunch for all speakers and moderators.



Data Privacy Asia

PDPC Chairman, Mr Leong Keng Thai, delivered a keynote speech as Guest-of-Honour at the Data Privacy Asia 2015, themed 'Data Privacy: Your Business Imperative'. Held in the month of August, the three-day event featured over 25 thought leaders and tackled topics such as the implications for data protection with the growth of mobile, cloud and social networking technologies. It also strived to help participants better understand how to achieve a balance between data-driven innovations and individual data protection.



SME Expo

The SME Expo is an exhibition organised by the Singapore Chinese Chamber of Commerce & Industry (SCCCI) that attracts over 4,500 delegates annually. The PDPC hosted a booth at the 2015 event held at Suntec Convention Centre, and took the opportunity to educate SME representatives on the PDPA, as well as provided details on the PDPC initiatives that can aid organisations in their compliance.



We believe in achieving synergies through collective efforts with other public and industry entities.

> Forming Bonds For Better Results

> Industry Partner Quotes

COLLABORATION WITH PARTNERS



FORMING BONDS FOR BETTER RESULTS

Strategic alliances empower the PDPC to make deeper inroads in expediting industry compliance.



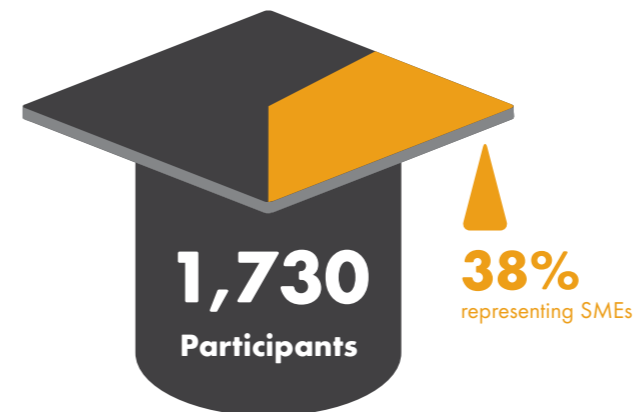
Financial Assistance

To help SMEs strengthen their overall data management framework and strategies, and adopt a systematic approach in mitigating risks of unintended personal data disclosure across the data lifecycle, PDPC collaborated with SPRING Singapore in August 2016 to help SMEs to tap on SPRING's Capability Development Grant (CDG). The grant is especially useful for SMEs that are keen to review their personal data collection and management processes, and can be used to defray up to 70 percent of qualifying upgrading project costs that may include consultancy and training services, assessments and audits, and can also be used to defray the costs of adopting software solutions that assist organisations in their compliance with data protection obligations.

Legal Advice Scheme

A joint effort between the PDPC and the Law Society of Singapore, the PDPA Legal Advice Scheme was launched in June 2015. This scheme enables SMEs to gain basic legal advice from a legal representative assigned by the Law Society, on their compliance with the PDPA.

The Law Society adds further value to the process by helping SMEs to complete the relevant documentation prior to the consultation, so that the one-hour session can be optimised. During the consultation, SMEs will be provided with an initial assessment of their level of compliance with the PDPA and preliminary advice on what may be needed to address the gaps.



Fundamentals Of The PDPA Course

PDPC's two-day Workforce Skills Qualifications (WSQ) course, a collaboration with the Skills Future Singapore (SSG), previously known as Workforce Development Agency (WDA), saw increased participation from the previous year. From April 2015 to September 2016, 1,730 participants completed the course, with 38 percent of them representing SMEs.

Collaborating With Industry

To date, we have tapped on the industry network of at least 67 trade associations, chambers of commerce and professional bodies to help us reach out to organisations. Their assistance is valuable for information dissemination whenever new initiatives are rolled out, and many take the initiative to approach us to conduct briefings on areas of the PDPA that could do with further clarifications for affected sectors. There are also those that have taken the lead and are working with us to develop guidelines which are specific to their corresponding industry sectors. We look forward to deepening our relationships with them and exploring new avenues for future collaboration.



WORDS FROM THE INDUSTRY



"At CapitaLand, the protection of customers' personal data is important to us. This is even more so in this digital age of omni-channel, borderless communications. Besides having a robust set of policies, it is crucial that our stakeholders share our commitment to good data practices.

Our collaboration with PDPC at our regular Biz+ retailer engagement event has furthered our efforts to safeguard the interests of our shoppers by reaching out to hundreds of retailers. CapitaLand remains committed to personal data protection as we increase our engagement with customers in the online and offline realms."

- Ms Teresa Teow, Head, Retail Management, Singapore, CapitaLand Mall Asia



"The Direct Marketing Association of Singapore has collaborated with PDPC on numerous initiatives since its establishment in 2013. Having reliable, complete data about customers and prospects is the cornerstone of all successful marketing programmes today; so nothing matters more than for companies to be trusted by consumers to collect, manage and use their data wisely.

Through the standards set by the Personal Data Protection Act 2012, as well as the educational initiatives of the PDPC and organisations like DMAS, the standard of marketing practice in Singapore has been raised. We are well on our way to increasing our customers' trust and improving our marketing bottom line with responsible data use."

- Ms Lisa Watson, Chairman, Direct Marketing Association of Singapore

"PDPC plays a major role in protecting the personal data of consumers from misuse by unscrupulous retailers. We work closely with them to provide mediation services for resolving consumer disputes in relation to the PDPA. PDPC also participates in our outreach events regularly, such as the World Consumer Rights Day, to educate the public on good personal data protection practices.

With the PDPA in place, businesses are now more transparent in how they manage consumers' personal data, thus strengthening consumers' confidence in the retail industry."

- Mr Seah Seng Choon, Executive Director, Consumers Association of Singapore (CASE)



"Given the growing scale and sophistication of cyber threats, it is important for Singapore to ensure that it has a robust data protection framework in place, which is backed by credible cybersecurity measures. Creating a safer cyberspace requires the collective effort of the government, businesses, individuals and the community.

To this end, the Cyber Security Agency of Singapore (CSA) collaborates closely with PDPC on outreach and education initiatives, to reach out to companies and the public. This empowers them to understand how to protect their personal data, and thereby play a vital part in creating a safe and secure cyberspace."

- Mr David Koh, Chief Executive, Cyber Security Agency of Singapore



Tools and resources are available to help organisations embed accountability in data protection practices.

> Giving Guidance, Clearing Doubts

> Showing The Way

GIVING GUIDANCE



GIVING GUIDANCE, CLEARING DOUBTS

“Advisory Guidelines and guides, which are rolled out regularly by the PDPC, are useful for organisations to understand how to comply with the PDPA.”

- Ms Evelyn Goh, Director, Comms, Policy & Projects, PDPC

Due to the varying nature of businesses, there is no one-size-fits-all approach that can be applied across the board. The PDPC develops Advisory Guidelines and guides to help organisations understand how to operationalise data protection compliance based on their industry sectors and requirements. Advisory Guidelines, for instance, indicate the manner in which the PDPC will interpret provisions of the PDPA, making it easier for stakeholders to comprehend the application of the personal data protection and Do Not Call provisions on specific concepts and topics, such as the notification obligation, anonymization and specified messages.

Sector-specific Advisory Guidelines, which focus on sector-specific issues, have also been developed for five different industries, namely telecommunication, real estate agency, education, healthcare and Social Services. Over the past 18 months, two new Advisory Guidelines – Requiring Consent for Marketing Purposes and Enforcement of Data Protection Provisions – were issued and revisions were made to an earlier two that now include more scenarios.

Besides these, PDPC’s guides are another valuable resource that provide information and examples of good

practices that organisations may adopt to fuse data protection measures in their day-to-day operations. The Guide to Handling Access Requests, for instance, explains how organisations can manage requests by individuals to access their personal data, and include sample access request and acknowledgement forms. The Guide on Building Websites for SMEs, on the other hand, addresses the data protection considerations of website development and management, including the outsourcing of such works to IT vendors.

“The importance of well-structured data protection clauses in an agreement between the organisation and its IT vendor are sometimes neglected, resulting in a lack of clarity in responsibilities and this may lead to personal data breaches. Our guides and template clauses help them to take the necessary steps to remedy and even mitigate such issues,” said Ms Evelyn Goh, Director, Comms, Policy & Projects, PDPC.

In addition to the Advisory Guidelines and guides, the PDPC also provides guidance to organisations to reduce the uncertainty organisations may face with regards to specific requirements of the PDPA. To date, 21 organisations have received practical guidance from PDPC.



SHOWING THE WAY

The PDPC has intensified its efforts in paving new avenues for help seekers to access, understand and implement personal data protection measures.

Avenues Of Help

Many SMEs lack expertise in data protection. Hence, the PDPC is continually devising new avenues to assist them in building such capabilities. Guided self-help is the first step in this direction and we have developed and handed out basic tools such as the business operation checklist for this purpose. Similarly, an online page comprising Frequently Asked Questions (FAQs) has also been made available, enabling organisations to find quick answers to common questions on their own.

Through the years, we have also conducted briefings to train data protection practitioners from organisations of different sectors and various sizes, who have been tasked to ensure their respective functions' compliance with the PDPA within the organisations.

Apart from the quarterly public briefings we conducted over the past two years, general briefings on the PDPA were held in collaboration with the National Library Board (NLB) and the National Cloud Computing Office, Singapore Business Federation (SBF), Singapore Chinese Chamber of Commerce & Industry (SCCCI), City Developments Limited, CapitalLand Limited and Direct Marketing Association of Singapore (DMAS).

We also worked with the Ministry of Manpower to host specific briefings for organisations from the employment sector, Shared Services for Charities to help Voluntary Welfare Organisations (VWOs) understand the PDPA better, and Council for Estate Agencies (CEA) to convey key points across to the real estate agencies, through the KEO Dialogue sessions.

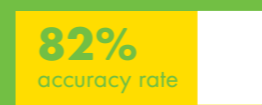
In 2015, PDPC launched a Personal Data Protection (PDP) Toolkit for organisations, which comprises a summary of initiatives aimed at helping organisations better understand the PDPA and to handle personal data with greater responsibility and care.

Through these initiatives, PDPC was able to reach out to close to 6,000 corporate representatives and more than 3,600 organisations.



Humanising Technology: Ask Jamie

'Ask Jamie', an automated 24/7 virtual assistant, was introduced on both the PDPC and DNC websites in March 2016. Utilising natural language processing with everyday syntax to decipher questions and provide suitable responses, Jamie adds a human touch to interactions with users who visit the PDPC website to find quick answers. It also streamlines users' search processes, so that they can obtain answers without having to look through the entire FAQ section on the website. Visitors to PDPC's website simply have to enter their questions into a dialogue box and wait for Jamie to provide the relevant answers. Improving the quality of Jamie's responses continues to be a part of PDPC's ongoing efforts to improve users' experience.



26,000 Ask Jamie queries received



As end of September 2016
49,565 email & phone queries received by the F&M team

7,215
Phone Enquiries

42,350
Email Enquiries

17%
from organisations

On Air

Since data protection may be a daunting topic to broach for some, PDPC decided to engage a non-intrusive and light-hearted approach to convey its messages and clear misconceptions. A four-part TV information-education series titled, 'Your Personal Data, Our Responsibility', shown in both English and Mandarin on free-to-air channels, was produced to help viewers gain a greater appreciation of the common data protection issues that organisations face, and how to deter or remedy them. The series succeeded in reaching out to 2.3 million viewers.

Popular local TV variety show host Pornsak acted as a DPO for a hypothetical SME. Scenarios ranging from personal data breaches, consumer complaints and accidental disclosures were experienced by the SME and the DPO went on a learning journey to find out about good data protection practices, from a breadth of organisations ranging from VWOs to MNCs. The series was complemented by print versions of the case studies in mainstream media, and can be accessed on the PDPC YouTube channel.



LinkedIn As A Conduit

In April 2016, PDPC boosted its presence on social media with the creation of a LinkedIn account. This opens up yet another conduit to disseminate relevant news and updates in personal data protection to the industry, and allows followers of the profile to connect with PDPC easily when the need arises.



>300 LinkedIn followers

Benefitting From Others' Experience

The PDPC has published a collection of case studies featuring organisations that have effectively implemented policies and processes for the protection of personal data.

More importantly, they serve as useful references for organisations – especially those that had encountered difficulties in kick-starting the implementation of data protection policies and procedures. Interested parties get to hear from household names such as Eu Yan Sang, MasterCard and National Trades Union Congress (NTUC) about the challenges in complying with the PDPA.

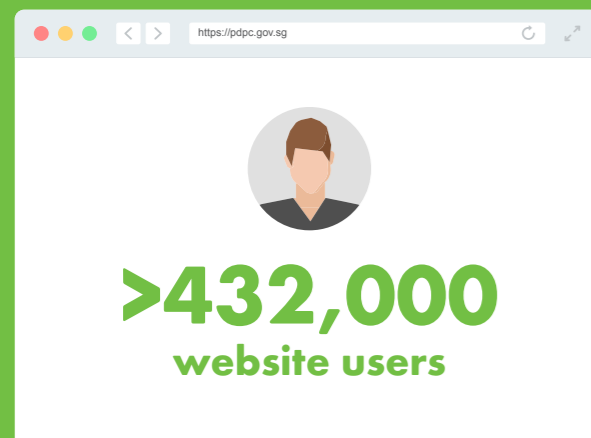
Smaller organisations, such as Lembaga Biasiswa Kenangan Maulud (a bursary and scholarship-disbursing organisation that helps needy students) and Redmart (an online grocer) also provided useful tips in protecting the personal data of donors and beneficiaries. Redmart ensures customer anonymity through various solutions such as a delivery app, which provides delivery staff with information on a need-to-know basis.

Many of the simpler implementations shared by these organisations demonstrate that complying with the PDPA is not necessarily an onerous and expensive process – a misconception held by some organisations that have yet to begin their personal data protection journey. Rather, each organisation's journey is dependent on a host of factors, such as the nature of its business, scale of operations and current stage of data protection.

Online Learning

A popular five-module programme that has served over 20,000 website visitors, the PDPC e-learning platform is a useful resource for organisations that want their employees to acquire a basic understanding of the PDPA. In June 2015, an assessment module was added to the programme, which allows users to test their learning outcomes from the programme. At the end of September 2016, more than 970 participants have sat through all five individual modules before completing the assessment.

Another new feature that was added subsequently is the e-learning Corporate Account for organisations. Through this, organisations can now use the e-learning programme as a corporate training tool to equip their employees with primary knowledge of the PDPA. More than 60 organisations, big and small, have applied for an e-learning corporate account since its launch in August 2015, with 5,400 employees benefitting from the e-learning programme training.



Further progress is being made with our continued efforts to educate all levels of society in data protection.



REACHING OUT TO ALL AGES

REACHING OUT TO ALL AGES

No one is left behind in our efforts to impart knowledge that ensures adequate security for everyone's personal data.



"It is important for consumers to understand the implications of sharing personal data with others and to know their role in safeguarding the information. This helps to ensure responsible data use and handling by organisations, as we journey towards the goals of Singapore's Smart Nation vision."
- Mr Yeong Zee Kin, Assistant Chief Executive, PDPC



raising awareness on various aspects of cyber security and personal data protection that young students should pay heed to. The books contain fun and engaging activities, while educating them on different aspects of cyber safety. The first issue has reached the hands of 42,000 primary 5 students, through their schools. An online version is also available on the PDPC and CSA websites.

The stories follow Crypto and Synthia, our cyber defenders, on their quest to secure the cyberspace. Students are informed about the dangers of downloading apps that attempt to elicit personal data from them.



Read online at <https://goo.gl/Giriei>

The message of data protection can be challenging to convey, if it is based on the efforts of PDPC alone. However, by partnering and participating in specific events with other government agencies, our message will be aligned with theirs. This allows us to target the right audience better and spread our reach wider.

Early Education

Growing up in the digital age, it is crucial for children and youths to know the implications of their decisions on the Internet. The PDPC recognises this need and has taken steps to engage students at primary, secondary and tertiary institutions to emphasise the importance for them to be responsible for protecting their own personal data.

Besides reaching out to them through talks and roadshows, such as the Infocomm Development Authority's (IDA) Lab on Wheels initiative where messages for students are communicated through a roving bus, we also participate actively in the Ministry of Education's (MOE) Cyber Wellness Student Ambassador Programme (CWSAP)

where display booths are set up in schools to educate students on the importance of personal data protection.

Furthermore, the PDPC is collaborating with the Cyber Security Agency of Singapore (CSA) to create a series of student activity books titled 'Cyber Safety', with the aim of

As of October 2016, PDPC has reached out to over 78,000 students about their personal data protection responsibilities.



CWSAP 2016

Helping The Elderly

Knowing a digital gap exists between the youths and elderly, a different approach is needed to help our country's senior citizens gain a better understanding of the benefits of data sharing; as well as the steps they can take to protect their own personal data in the digital space. PDPC has therefore leveraged on IDA's Silver Infocomm initiatives such as the annual Silver IT Fest, to impart this knowledge to them. This is in tandem with IDA's goals of improving the digital literacy of seniors and better integrating them into society, through engagement events such as the annual Silver IT Fest in 2015 and 2016.

Other efforts include teaming up with CASE when they organise grassroots roadshows, to reach out to the masses. For instance, we participated in the annual CASE World Consumer Rights Day in March 2016, where more than 1,500 members of the public were engaged through a five-day roadshow.

To date, we have connected with more than 135,000 consumers through our events and outreach activities.

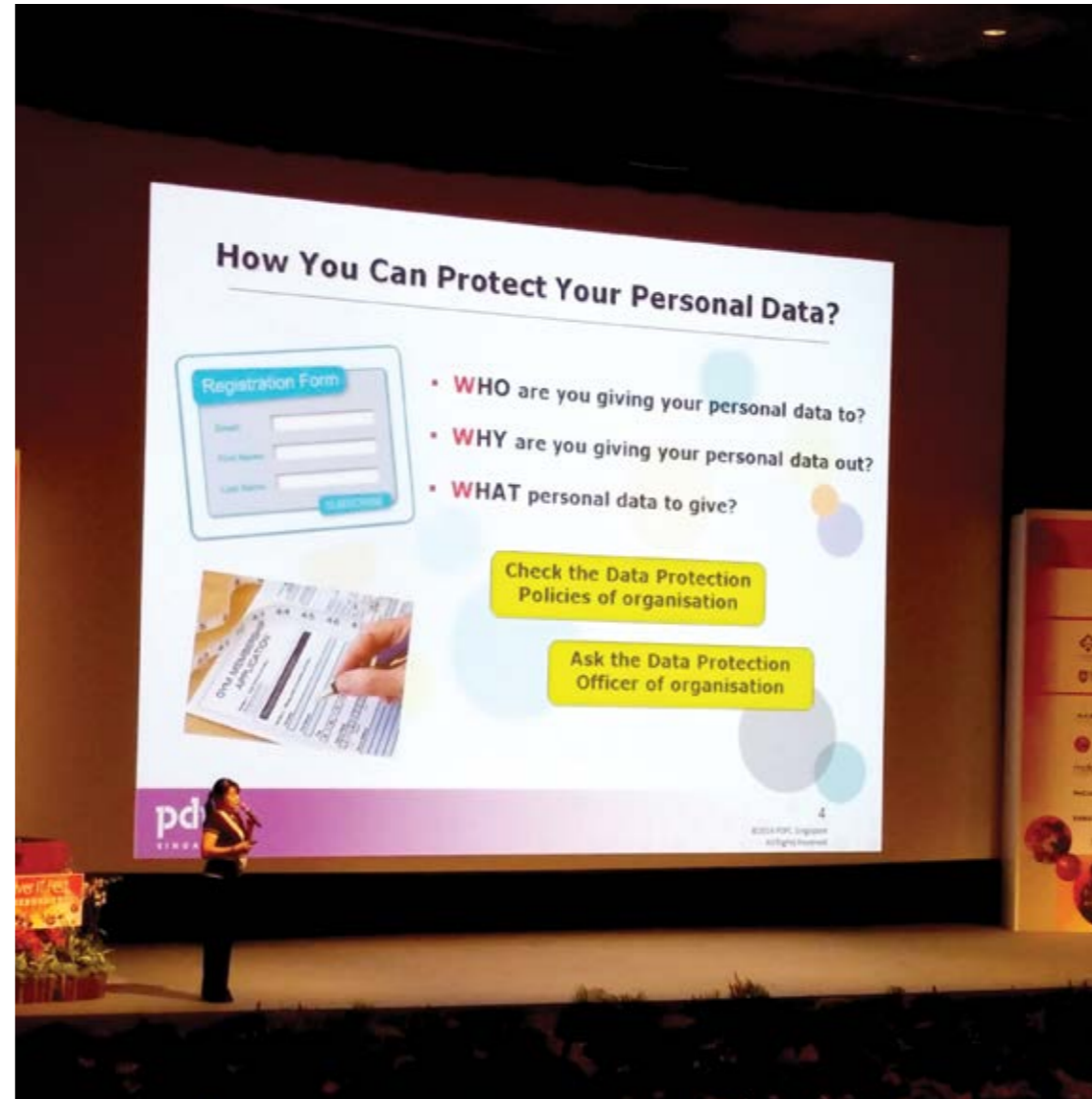
>135,000 individuals participated in our outreach events

9 in 10 consumers agreed that PDPA is a good initiative to protect their personal data from misuse.

86% Of those who signed up for the DNC registry, had experienced a drop in the number of telemarketing messages received over the past one year.

70%-80% of consumers were positive towards the effectiveness of the PDPA on organisations' practices.

8 in 10 consumers who have signed up for the DNC Registry felt that it was effective in protecting their personal data from misuse.



PDPC sees the importance of keeping abreast with developments in data protection across the globe.



INTERNATIONAL ENGAGEMENTS

INTERNATIONAL ENGAGEMENTS

Connecting with international data protection authorities is essential to help PDPC enforce cross border breaches and to develop and improve its policies.

Many businesses today transact across borders, some with operations in multiple jurisdictions, or store data in more than one country.

Against this backdrop, it is essential for PDPC to be plugged into an international network of data protection authorities, to enable us to stay abreast of international perspectives of personal data protection issues, support joint initiatives and awareness campaigns, and discuss aspects of tackling cross border challenges. Should a personal data breach concurrently affecting multiple countries occur, a pre-existing connection allows us to reach out to other data protection authorities swiftly to share useful information, exchange views on tackling the breach and thereby, possibly accelerate the taking of appropriate enforcement action against perpetrators.

The PDPC is a member of a number of regional and international networks. Taking part in the APEC Data Privacy Subgroup (DPS) Senior Official Meetings from 2013, and joining APEC Cross-Border Privacy Enforcement Arrangement (CPEA), Asia Pacific Privacy Authorities (APPA) and Global Privacy Enforcement Network (GPEN) in 2014, were significant steps in this direction. In 2015 and 2016, the following international engagements marked PDPC's efforts to boost its global connections and elevate its standing and presence in the international data protection landscape.



Asia Pacific Privacy Authorities (APPA) Forum

APPA serves as a platform for 19 regional data protection authorities to form partnerships and exchange ideas on new developments and best practices about personal data protection measures and regulation. PDPC has been a member of the Asia Pacific Privacy Authorities (APPA) since 2014 and participated in the 43rd and 44th APPA Forums in Hong Kong and Macao respectively in 2015.

Scheduled back-to-back with PDP Seminar 2016, the 45th APPA Forum was hosted by PDPC in Singapore on 21 and 22 July 2016. The event was a big success, with over 50 international and local delegates attending the two-day sessions. They benefitted from topics ranging from data portability and information sharing in the public sector, to the effectiveness of educational activities.

Delegates were also treated to a tour of the National Gallery, where they learned about Singapore's rich culture and history through a guided tour.



Privacy Awareness Week (PAW)

PDPC participated in Privacy Awareness Week (PAW) for the first time in 2015, an annual initiative that was started by the Asia-Pacific Privacy Authorities (APPA) in 2006 to promote and raise awareness of the importance of personal data protection. Usually held during a week in May, PAW member authorities would conduct a variety of activities aimed at individuals, businesses and government organisations. The themes for PAW 2015 and 2016 were 'Privacy Matters' and 'Data Protection in Your Hands' respectively.

Besides actively posting on PDPC's social media platforms to promote PAW, the PDPC also developed posters and Electronic Direct Mailers (EDMs) to highlight the main obligations under the PDPA, how employees can play their part to protect personal data at the workplace, as well as common scenarios relating to personal data protection situations, for the weeks of PAW in 2015 and 2016. Google, in collaboration with PDPC, also held a half-day workshop for 50 mobile app developers in conjunction with PAW 2015, to talk them through some of the key personal data protection considerations for developing apps over the Android platform.



International Association for Privacy Professionals (IAPP) Asia Privacy Forum – Singapore

Organised by the world's largest information privacy association, the IAPP Asia Privacy Forum – Singapore was kicked off in 2014 to provide a platform for data protection and privacy professionals working in the region to share best practices and advance privacy management issues. PDPC Commission Member Ms Aileen Chia gave a keynote speech on the early stages of the personal data protection regime in Singapore, and our interest in providing support systems for companies in the region at the 2015 event. PDPC Assistant Chief Executive Mr Yeong Zee Kin's keynote speech for the 2016 event focused on PDPC's enforcement priorities and the challenges personal data protection professionals face in the digital age.

APEC Data Privacy Subgroup Senior Official Meetings

Held in Hong Kong in September, the Sedona Conference saw PDPC's Assistant Chief Executive, Mr Yeong Zee Kin, participate in a panel discussion, to discuss emerging trends and developments in APAC, pertaining to data protection and cybersecurity. Featuring a mix of data protection authorities, legal counsels, and information governance professionals, the conference also focused on topics such as information governance, eDiscovery, as well as cross-border data transfer issues.

International Conference of Data Protection & Privacy Commissioners (ICDPPC)

The annual International Conference of Data Protection & Privacy Commissioners (ICDPPC) brings together data protection authorities from all over the world, DPOs of multinationals, MEPs and other stakeholders to discuss data protection issues. Ms Evelyn Goh represented PDPC in a panel discussion at the ICDPPC conference in Amsterdam in 2015 and spoke on the role of a DPO in the context of big data.

European Data Protection Days (EDPD) Conference

The 6th EDPD Conference was held on April 2016 in Berlin, Germany, where more than 200 international and local representatives from corporate organisations and data protection authorities gathered to exchange ideas and information relating to new developments in the EU General Data Protection Regulation (GDPR). It was a good platform for projecting PDPC in the European data protection landscape.

PDPC Chairman Mr Leong Keng Thai delivered a keynote address at the event, on the need for a robust personal data protection regime in driving Singapore's Smart Nation vision. He also participated in a panel discussion alongside data protection authorities from Europe and the U.S. to discuss views on regulating global data flows, and a data protection authority's role in achieving a balance between overseeing personal data protection and contributing to the country's economic growth and innovation.



Centre for Information Policy Leadership (CIPL) Roundtable & Workshop

Riding on the PDP Seminars, the Centre for Information Policy Leadership (CIPL) took the opportunity to lead a delegation to Singapore to discuss data protection issues such as cross-border data transfers with PDPC in May 2015, and conducted a workshop on enabling legal compliance and cross-border data transfers with the APEC Cross Border Privacy Rules (CBPR) in July 2016. PDPC Chairman Mr Leong Keng Thai and Commission Member Ms Aileen Chia hosted a roundtable session for the delegation in 2015, while Assistant Chief Executive Mr Yeong Zee Kin delivered the Opening Remarks and participated as a panel speaker in the 2016 workshop.

The Sedona Conference Institute

Featuring a mix of data protection authorities, legal counsels and information governance professionals, the Sedona Conference focuses on data protection topics such as information governance, eDiscovery, as well as cross-border data transfer. PDPC's Assistant Chief Executive Mr Yeong Zee Kin participated in a panel discussion at the September 2016 event that took place in Hong Kong, touching on emerging trends and developments in the Asia-Pacific region pertaining to data protection and cybersecurity.

**We find meaning in
bringing hope and joy
to others.**




GIVING BACK TO SOCIETY

GIVING BACK TO SOCIETY

PDPC envisages its staff to be responsible citizens and group volunteerism is one way of fostering altruism. In August 2015, the entire PDPC, led by Chairman Mr Leong Keng Thai, made a visit to St John's Home for the Elderly to bring cheer to the residents.

Our staff taught the 98 elderly residents how to make lanterns from red 'Hong-Bao' packets, sang songs with them and played games such as Bingo! with them. Food, drinks, goodie bags and hampers were also distributed, specially prepared for the Home by our staff. The joyful smiles of the residents made it a positive and enriching experience for all of us.



An aerial photograph of Gardens by the Bay in Singapore at sunset. The sky is a vibrant mix of orange, pink, and purple. The two large, illuminated conservatories, the Flower Dome and the Cloud Forest, are prominent on the left. The Supertrees, tall, tree-like structures, are scattered across the park, some with glowing tops. The water of the bay is visible in the background, with many ships anchored. The overall scene is a blend of natural beauty and modern architecture.

**PDPC continues to seek better approaches
to improve personal data protection in
our society.**

www.pdpc.gov.sg



PERSONAL DATA
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S I N G A P O R E

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