

PERSONAL DATA PROTECTION COMMISSION

Case No. DP-1907-B4201

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

And

AXA Insurance Pte. Ltd.

SUMMARY OF THE DECISION

1. The Personal Data Protection Commission (the “**Commission**”) received a complaint on 4 July 2019 against AXA Insurance Pte. Ltd. (the “**Organisation**”). The complaint was about an email (the “**Email**”) sent with a scanned document (the “**Attachment**”) containing personal data of 87 other policyholders (the “**Affected Individuals**”) to the Complainant on 28 June 2019. (the “**Incident**”).
2. The Attachment was an internal email correspondence of the Organisation that contained the names, NRIC numbers, insurance policy numbers and the details of the servicing agents of the Affected Individuals (the “**Personal Data**”). The Attachment was not meant for the Complainant.
3. The Organisation admitted that during scanning of documents by its employees, it did not have a process to segregate documents intended for internal record purposes from documents for customers.

4. The Organisation's customer care specialist who retrieved the scanned document which formed the Attachment also failed to check the Attachment before sending out the Email.

5. The Commission found that these lapses in processes resulted in the Incident. The lapses pointed to a failure by the Organisation to make reasonable security arrangements to protect the personal data of its policyholders from inadvertent disclosure by its employees. The Organisation was therefore found in breach of the Protection Obligation under section 24 of the Personal Data Protection Act 2012. The Commission has decided to issue a warning to the Organisation after considering the admission of liability by the Organisation, the impact of the breach and the corrective measures taken.