

PERSONAL DATA PROTECTION COMMISSION

Case No. DP-1808-B2508

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

And

CampVision Ltd.

SUMMARY OF THE DECISION

1. CampVision Ltd (the “**Organisation**”) engaged SHINE Children and Youth Services (“**SHINE**”) to collect evaluation feedback from youths participating in its programmes. For this purpose, SHINE collected information from the youths on the Organisation’s behalf, including their names, NRIC numbers, email addresses and schools (the “**Personal Data**”). SHINE did this using a platform provided by Typeform S.L. (“**Typeform**”), a company based in Spain, which provides online survey services. In June 2018, Typeform discovered that an unknown third party had gained access to its server and downloaded information provided by many Typeform users, including Personal Data collected by SHINE on behalf of the Organisation (the “**Incident**”).
2. The Personal Data Protection Commission (the “**Commission**”) found that Personal Data of 106 individuals collected by SHINE on behalf of the Organisation had been exposed to the risk of unauthorised access and disclosure in the Incident. The Commission’s investigations revealed that there was no written contract between the Organisation and

SHINE setting out SHINE's obligations with respect to the processing and protection of Personal Data, which it collected on the Organisation's behalf. The Organisation also admitted that it had not conveyed any instructions to SHINE with respect to protection of the Personal Data. In the circumstances, the Deputy Commissioner for Personal Data Protection found the Organisation in breach of section 24 of the Personal Data Protection Act 2012 and decided to give a warning to the Organisation.