

PERSONAL DATA PROTECTION COMMISSION

Case No. DP-1810-B2869

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

And

ERGO Insurance Pte. Ltd.

SUMMARY OF THE DECISION

1. ERGO Insurance Pte Ltd (the “**Organisation**”) is a general insurer and operates an internet portal (the “**Portal**”) which enables its insurance intermediaries, who are not the Organisation’s employees, to request for documents of policyholders represented by the intermediaries. These documents contain the policyholders’ personal data such as their names, addresses, car registration numbers, genders, nationalities, NRIC numbers, dates of birth and contact numbers (the “**Personal Data**”).
2. The Organisation voluntarily informed the Personal Data Protection Commission on 15 October 2018 that it had earlier discovered, on 11 September 2018, that some of its insurance intermediaries had been incorrectly sent documents of policyholders who were represented by other insurance intermediaries (the “**Incident**”). The Incident arose when some insurance intermediaries (the “**Intermediaries**”) requested for documents of policyholders which they represent through the Portal. However, the Organisation’s application and printer servers had been shut down for a scheduled system downtime and when they were restarted, the Organisation’s employees had failed to follow the correct restart process. They were supposed to start both servers at the same time but this was

not done as the starting of the printer server initially failed. This resulted in documents with duplicate document IDs being generated and hence the wrong documents being sent to the Intermediaries. As a result of the Incident, the Personal Data of 57 individuals were mistakenly disclosed to the Intermediaries.

3. The Personal Data Protection Commission found that the Organisation did not have in place a clearly defined process to restart its application and printer servers and a sufficiently robust document ID generation process (such as including a timestamp as part of the document ID) to prevent the duplication of document IDs. 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. No directions are required as the Organisation implemented corrective measures that addressed the gap in its security arrangements.