

PERSONAL DATA PROTECTION COMMISSION

Case No. DP-1809-B2767

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

And

Global Outsource Solutions Pte. Ltd.

SUMMARY OF THE DECISION

1. Global Outsource Solutions Pte. Ltd. (the “**Organisation**”) provided warranties for products purchased by its clients’ customers. To be eligible for this warranty, customers registered their purchases with the Organisation via the Organisation’s website at <http://www.globaloutsourcesia.com> (the “**Website**”). The Organisation collected various personal data from such customers for this purpose, including personal information such as their name, email address, mailing address and contact number, and details of the customers’ purchases such as the name of the product purchased, the purchase date, the name of the retailer and the location of the physical store where the product was purchased (collectively, the “**Personal Data**”).
2. The Personal Data Protection Commission (“**the Commission**”) received a complaint on 23 September 2018 that the complainant could access the Personal Data of another individual when viewing a warranty registration summary page on the Website (**the “Incident”**).

3. The Organisation admitted to the occurrence of the Incident but was unable to identify the cause of the Incident. The Commission found that the Organisation had not provided any security requirements to the vendor it had engaged sometime in 2013 to develop the Website. Consequently, it had not reviewed the Website's security arrangements or conducted any security testing on the Website. In the circumstances, the Organisation had not implemented reasonable security arrangements to protect the personal data collected by the Website (including but not limited to the Personal Data disclosed in the Incident) and is therefore in breach of section 24 of the PDPA.
4. The Commission also found that the Organisation did not have any internal data protection policies for its employees in relation to the handling of personal data for the purposes of registering products through the Website. This failure to develop and implement such internal data protection policies is a breach of section 12 of the PDPA.
5. The Organisation has since removed the warranty registration section on its website and is in the process of revamping its Website to incorporate the necessary security arrangements. The Organisation is directed to develop and implement policies for data protection and staff training in data protection, and to put all employees handling personal data through data protection training.