

# Data Protection Starter Kit Checklist

This checklist provides a guide for organisations in the **implementation of accountable data protection practices** in the management of personal data under its possession or control. It references the following PDPC guides

- Guide to Developing a Data Protection Management Programme (DPMP) ([www.pdpc.gov.sg/DPMP](http://www.pdpc.gov.sg/DPMP))
- Guide to Managing Data Breaches 2.0 ([www.pdpc.gov.sg/Managing-Data-Breaches](http://www.pdpc.gov.sg/Managing-Data-Breaches))
- Guide to Data Protection Impact Assessments ([www.pdpc.gov.sg/DPIA](http://www.pdpc.gov.sg/DPIA))

**Organisations may also consider Data Protection-as-a-Service for SMEs (DPaaS@SMEs) Providers registered with IMDA to implement the DPaaS Package in Section 1 and 2.**

SECTION 1: DPAAS PACKAGE (ONE-TIME SETUP)		
A. Data Protection Management		
Step	Description	Resources/ References
1.	Appoint a DPO and business contact information is made available to the public <input type="checkbox"/>	For ACRA-registered entities, organisations may register in ACRA BizFile+ ( <a href="http://www.bizfile.gov.sg">www.bizfile.gov.sg</a> ).  For non ACRA-registered entities, organisations may register the DPO with PDPC ( <a href="http://www.pdpc.gov.sg/dpo-registration">www.pdpc.gov.sg/dpo-registration</a> ).  Refer to <i>Appendix I</i> for instructions to register DPO on ACRA BizFile+ and sample website notice on making available the business contact information of DPOs.
2.	Identify risks and gaps using PDPA Assessment Tool for Organisations (PATO) <input type="checkbox"/>	Refer to the <a href="http://www.pdpc.gov.sg/PATO">PDPA Assessment Tool for Organisations (PATO)</a> ( <a href="http://www.pdpc.gov.sg/PATO">www.pdpc.gov.sg/PATO</a> ) to identify, evaluate, rectify and improved current gaps with regards to the management of personal data.
3.	Develop a Data Protection (DP) Policy <input type="checkbox"/>	Refer to <i>Appendix II</i> for the DP Policy (Sample).  For Steps 4 to 10, references will be made to the relevant annexes in the sample DP Policy (Sample).
4.	Embed data protection as part of corporate governance and establish a reporting structure for data protection matters <input type="checkbox"/>	Refer to <i>ANNEX A-1</i> of the DP Policy (Sample) for a sample corporate reporting structure.  Additional references can be found under “ <b>Policy</b> ” section in the DPMP.

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5.	Embed regular monitoring and reporting mechanisms within Enterprise Risk Management (ERM) Framework <input type="checkbox"/>	Refer to <i>ANNEX A-2</i> of the DP Policy (Sample) for the Enterprise Risk Management Framework.  Additional references can be found under “ <b>Good DP Practices</b> ” section in the DPMP.
6.	Document data assets and flows using a Data Inventory Map <input type="checkbox"/>	Refer to <i>ANNEX B</i> of the DP Policy for Data Inventory Map Templates.  Additional references can be found under “ <b>Process</b> ” section in the DPMP.
<b>B. Data Breach Management</b>		
7.	Establish a data breach management team <input type="checkbox"/>	Refer to <i>ANNEX G</i> of the DP Policy (Sample) for the Data Breach Management Plan (Sample) which will include <ul style="list-style-type: none"> <li>• Data breach management team composition template;</li> <li>• Complaint Handling Procedure (Sample); and</li> <li>• Breach Incident Response Plan.</li> </ul> Additional references can be found in the Guide to Managing Data Breaches 2.0.
8.	Develop a complaint handling procedure <input type="checkbox"/>	
9.	Develop a 4-step action plan for data breach response (using C.A.R.E model) <input type="checkbox"/>	
<b>C. Training and Communications</b>		
10.	Develop a staff training and communications plan <input type="checkbox"/>	Refer to <i>ANNEX H</i> of the DP Policy (Sample) for the Training and Communications plan (Sample).
11.	Mandate all staff to complete the PDPA E-Learning Programme <input type="checkbox"/>	Refer to the PDPA E-Learning Programme for all staff ( <a href="http://www.pdpc.gov.sg/elearning">www.pdpc.gov.sg/elearning</a> )
12.	Identify key personnel to attend the 2 PDPC courses if they do not possess any prior data protection certifications listed in the DPO Competency Framework and Training Roadmap <input type="checkbox"/>	The 2 PDPC courses are: <ul style="list-style-type: none"> <li>• Fundamentals of Personal Data Protection Act (<a href="http://www.pdpc.gov.sg/fundamentals-of-pdpa">www.pdpc.gov.sg/fundamentals-of-pdpa</a>)</li> <li>• Practitioner Certificate in Personal Data Protection (<a href="http://www.pdpc.gov.sg/practitioner-certificate">www.pdpc.gov.sg/practitioner-certificate</a>)</li> </ul> For more information on the DPO Competency Framework and Training Roadmap ( <a href="http://www.pdpc.gov.sg/dp-competency">www.pdpc.gov.sg/dp-competency</a> )

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## SECTION 2: DPAAS PACKAGE (ANNUAL RETAINER)

1. Carry out annual review of data protection policies.
2. Conduct a table-top exercise to test the data breach response plan.
3. Provide one refresher training for key employees on handling personal data.

## SECTION 3: GOOD ACCOUNTABILITY PRACTICES

1. Conduct a Data Protection Impact Assessment (DPIA) for ***new or existing systems and processes undergoing changes*** to identify, assess and address risks.  
  
Refer to ANNEX E of the DP Policy (Sample) for the DPIA Report (Template).
2. Adopt the Data Protection-by-Design (DPbD) principles when developing ICT systems.  
  
Refer to Guide to Data Protection by Design for ICT Systems ([www.pdpc.gov.sg/DPBD](http://www.pdpc.gov.sg/DPBD)) for more information.
3. Independent validation of established policies, processes and practices.  
  
Organisations are encouraged to apply for the Data Protection Trustmark ([www.imda.gov.sg/dpcertifications](http://www.imda.gov.sg/dpcertifications)) certification for an independent review on its policies and processes.

## APPENDICES

<b>Appendix I</b>	Registration of DPO on ACRA BizFile+ and Sample Website DPO Notice	 Appendix I - Registration of DPO a
<b>Appendix II</b>	Data Protection Policy (Sample)	