



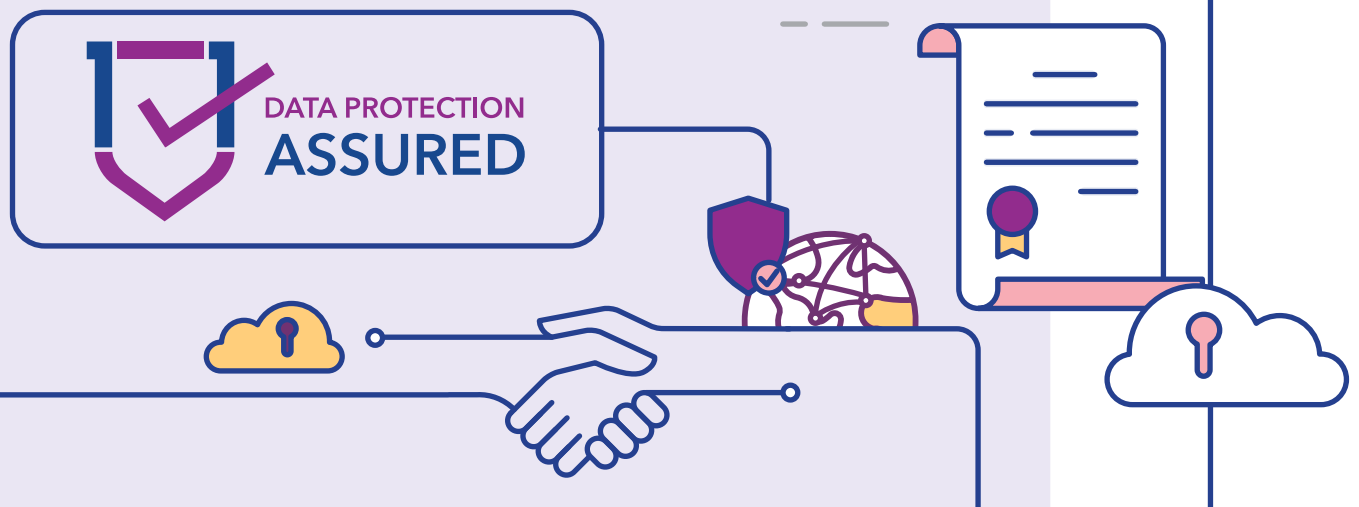
DATA PROTECTION
ASSURED

TRUST IS NOW CERTIFIED

THE DATA PROTECTION TRUSTMARK

A strong digital economy that supports innovation and cross-border flow of data is founded upon trustworthy data protection practices. Organisations that shift from compliance to accountability in the management of personal data demonstrate that they can handle personal data responsibly, thus instilling a high level of consumer trust.

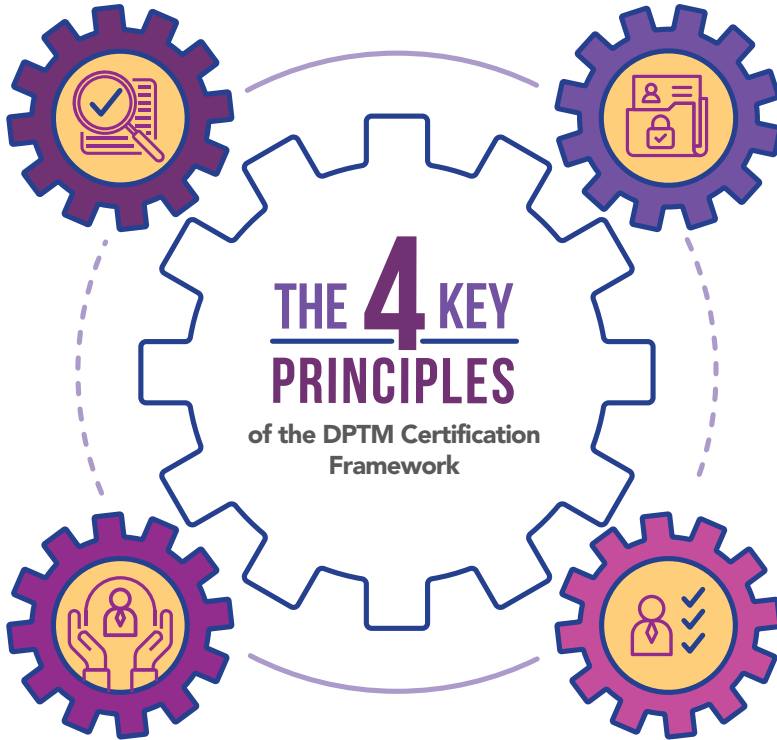
As part of advancing Singapore’s digital economy as a trusted data hub, the IMDA has developed the Data Protection Trustmark (DPTM) certification. Adapted from Singapore’s Personal Data Protection Act (PDPA) and international benchmarks and best practices, this enterprise-wide certification recognises organisations that demonstrate accountability in their data protection practices.



The PDPA governs the collection, use and disclosure of personal data by private organisations, in a way that recognises both the needs of individuals and organisations. There are nine data protection obligations on how organisations may comply with the PDPA, namely consent, purpose, notification, access and correction, accountability, protection, accuracy, retention and transfer. For more information, visit www.pdpc.gov.sg.

Governance and Transparency

Organisation has appropriate data protection policies and practices implemented to manage personal data, and these policies and practices are communicated to stakeholders.



Management of Personal Data

Organisation obtains appropriate consent to collect, use and disclose personal data for appropriate purposes notified to individuals.

Care of Personal Data

Organisation ensures appropriate information security, retention, disposal, accuracy and completeness of personal data.

Individual's Rights

Organisation provides for withdrawal of consent, access and correction of personal data by individuals.

BENEFITS OF DPTM



Increases Business Competitiveness

- Demonstrates to your customers that you have robust data protection policies and practices in place to safeguard their personal data
- Strengthens your organisation's reputation
- Builds confidence and trust with your customers
- Increases your business competitiveness, both locally and overseas

Provides Assurance to Your Organisation

- Validates your organisation's data protection regime
- Increases your data governance and protection standards
- Uncovers potential weaknesses to enable your organisation to take steps to mitigate risks

STORIES OF DPTM-CERTIFIED ORGANISATIONS

As the very first organisations to successfully receive the DPTM certification, these trailblazers have proactively committed to a higher standard of trust and data protection. The experiences they share reveal how they have conquered challenges to obtain certification, and the advantages brought about by the trustmark.

Here are their stories.



p.04
AIG Singapore

p.06
Carpe Diem @ ITE

p.08
DBS Bank

p.10
iColumn

p.12
M1

p.14
MAMORU Singapore

p.16
MaNaDr

p.18
New Hope
Community Services

p.20
P2D Solutions

p.22
Shangri-La Hotel,
Singapore

p.24
TRS Forensics

p.26
TTSH
Community Fund



AIG Singapore

SUSTAINING TRUST

IN A CHANGING DATA LANDSCAPE



For AIG Singapore, attaining the DPTM is an important validation of its data protection efforts. Notwithstanding, it is mindful that the journey does not end here.



MR CHRISTIAN SANDRIC
President and Chief Executive Officer
 AIG Singapore

The Data Protection Trustmark (DPTM) has been secured, but the job is not done. For insurer AIG Singapore, its data protection journey is an ongoing process.

The DPTM is a voluntary certification that enables organisations to demonstrate that they have a robust data governance standard and are able to meet the obligations of Singapore's Personal Data Protection Act (PDPA) and elements of international benchmarks.

"It is not about ticking the boxes. Risk is ever evolving. We need to constantly keep pace with advancements in technology and their impact on consumers. We cannot afford to be complacent just because we are certified," said Mr Christian Sandric, President and Chief Executive Officer of AIG Singapore.

UNDERPINNED BY TRUST

AIG is one of the largest insurance companies in the world and has had a presence in Singapore since 1953. It serves both individual customers and commercial clients, with insurance products offering coverage ranging from personal accident, car, travel and home, to that of energy and cyber risks for large corporate customers.

When AIG Singapore underwrites risk, it has to collect information about its customers. Depending on the types of insurance applied for, this could include personal data such as name,



Risk is ever evolving, and we need to constantly keep pace with the latest developments. We cannot afford to be complacent just because we are certified.



DPTM certification. "Be prepared," said Mr Sandric. "There are many criteria to meet in the self-assessment phase of the certification, so you need to get the basics right. Do not rush into it when you are not ready."

In June this year, AIG Singapore became the first insurer in Singapore to receive the DPTM.

For the organisation, the certification provides reaffirmation and validation that its efforts in personal data protection are focused on the right areas. Internally, the DPTM has helped reinforce the emphasis that AIG Singapore places on personal data protection to its employees.

And for partners and customers, third-party validation in the form of the DPTM helps strengthen their trust in the company. "It's not just us saying that we are protecting your data; the DPTM also attests to that."

"It is also important to keep in mind that personal data protection is an ongoing process," said Mr Sandric. "We cannot take certification to mean that we are all good. We have to continuously focus on personal data protection, and ensure that our policies, processes and practices are evolving with changes in the data landscape."

Taking a wider perspective, Mr Sandric feels that DPTM is important not just for AIG Singapore but also for the insurance industry as a whole.

"Data protection matters greatly to our customers so it is important for the insurance industry to put the right focus on this," he said. "We have a collective responsibility to make sure we continuously improve our data protection measures for our customers. Even though we are first in the industry to achieve the DPTM certification, I hope other insurers will follow."

NRIC number, contact information and existing health conditions. During the claims process, it also needs to gather information about a particular situation or incident. For example, if a customer falls ill, it has to collect medical information in order to process the medical insurance claim.

AIG Singapore has controls designed to ensure that it only captures information that is needed to provide services to its customers, and has policies and processes in place designed to ensure that this information is well protected. These include exercising care in data collection, understanding how to store the data safely and how to destroy it, and performing appropriate verification before any information is disclosed.

The important piece that underpins all these is trust. "Our business is based on trust and reputation, and trust lies at the heart of data protection. Certification provides good validation that our personal data protection efforts are on the right track, and thereby raises consumers' confidence in our brand. The people, organisational capabilities and services behind it are important. People buy from us because they trust us as an organisation," said Mr Sandric.

comprising around 20 subject matter experts from different lines of business, set about analysing the organisation's standard operating procedures for handling personal data and making sure that the proper controls were in place. A data register was also set up so that the organisation would have a better overview of the data that it collects and discloses.

Then in 2018 when the pilot for the DPTM was announced, AIG Singapore decided to pursue certification. "It's one thing to tell ourselves we are doing the right thing and that we are continuously working to strengthen data protection; but it's a great perspective to get someone else to look at what we have done and provide validation that we are doing the right things," said Mr Sandric.

RIGOROUS PROCESS

The certification process was rigorous. "As a global organisation, we have internal compliance policies in place across all our entities. In preparation for the certification, we consolidated the necessary documentation and data from various stakeholders and sorted the information for sharing with the DPTM assessor according to the certification requirements," explained Mr Sandric.

The assessment criteria also had to be contextualised for insurance business operations so that the organisation was able to clearly articulate to the assessor the controls it already has in place. "The whole process required us to get into a high level of detail across all levels of the organisation as we examined our current state against the certification standard," said Mr Sandric.

From this experience, one important insight that AIG Singapore shared was that organisations should have their data protection policies and practices firmly in place before they embark on

END-TO-END

ACCOUNTABILITY

"The ability to look at things end-to-end across the board is of paramount importance," said Mr Sandric. "We cannot say we have good data protection practices in a particular area if we do not understand the downstream impact of what we are doing."

When the PDPA was introduced, AIG Singapore set up a working group to study its then existing data protection policies and processes and map them against the PDPA. The group,



Carpe Diem @ ITE

STRENGTHENING TRUST BETWEEN SCHOOLS AND FAMILIES



For Carpe Diem @ ITE, attaining the DPTM is a key milestone in its ongoing personal data protection journey.



MR TAN KIAH HUI
Centre Director
Carpe Diem @ ITE

Parents' income tax forms, Central Provident Fund (CPF) statements, contact details – these are some examples of the personal data that childcare centre Carpe Diem @ ITE collects out of necessity.

Carpe Diem @ ITE has 178 children and 28 employees including teachers, cooks, cleaners, and administrative staff. Given the nature of the childcare business, various types of documents containing personal data are required to facilitate enrolment. Some parents even have to hand over their CPF statements or income tax forms to the centre in order to claim childcare subsidies.

But parents, employees and other stakeholders can rest assured that the information is in good hands, with the Data Protection Trustmark (DPTM) providing independent validation that the organisation has sound personal data protection policies and practices in place.

SENSITIVE INFORMATION

The protection of personal data is of paramount importance to Carpe Diem @ ITE. "We started paying more attention to personal data protection back in 2014, when the Personal Data Protection Act (PDPA) came into force," said Mr Tan Kiah Hui, Centre Director and Data Protection Officer (DPO) of Carpe Diem @ ITE. "When parents place their children in our centre, they need to have the peace of mind that we will take care of their personal data."

Children's data, especially, is sensitive information as they are minors and their personal information requires

greater care. Unintended disclosure of personal data such as their addresses, for example, could lead to safety concerns if the information were to fall into the wrong hands. These concerns provided Carpe Diem @ ITE with the impetus to go beyond mere compliance with the PDPA to making sure that it was accountable to all stakeholders in terms of its personal data protection policies and practices.

As a start, Mr Tan signed up for a basic course to understand the various obligations under the PDPA, and went on to attend an information privacy manager course.

Putting his new-found knowledge to good use, he guided the childcare centre through the process of identifying where data protection lapses may lie.

It took the centre about half a year to get its data protection policies, processes and practices sorted out. For example, prior to the review, all employees used to have open access to the children's files. Upon realising that there had to be better access controls to prevent unintended disclosure, the centre put a stop to this practice and provided teachers access only to information that was necessary for their work, such as the children's photographs for documentation purposes.

PHYSICAL SECURITY

Measures were also put in place to address physical security, especially since most of the data held by Carpe Diem @ ITE is in hard copy. These include not just children's and parents' records, but also employees' records with information such as their salaries.

To protect this data, the centre ensures that the cabinet containing files with personal data is locked at all times. Only three people have access to the key – the centre manager, an administrative staff and Mr Tan.

Besides the more obvious collection of personal data, the centre also handles a lot of worksheets which include children's names and sometimes their photographs as well.

Previously, after a child left the centre, his or her worksheets were either thrown into wastepaper bins, or recycled without checking to see if there was any personal data on the reverse side of the paper.

With the push for better personal data protection, the centre introduced the practice of shredding all worksheets



To me, the DPTM is important. Parents can see that we are putting in our utmost effort to do the right thing.



before disposing of them, to make sure that no personal or confidential information is divulged.

STAFF EDUCATION

Carpe Diem @ ITE also emphasised staff education. "We reiterated to our staff the importance of protecting personal data," said Mr Tan. To get them on board, he asked the staff to put themselves in other people's shoes. Just as they would not want their information to be exposed to others, they too should take care of the personal data that they handle.

"That is where we were coming from. We want to protect personal information, not just of the children but the employees as well. Once our staff understood this, they were more willing to take the necessary steps to protect personal data."

When the DPTM pilot was announced in July 2018, the centre decided to go for the certification. Explaining the reasons, Mr Tan said, "Can we prove to the parents and give them the assurance that we are doing our best to protect their data and their children's data? To me, the DPTM is important. Parents can see that we are putting in our utmost effort to do the right thing."

SELF-CHECKS

As part of the certification process, Carpe Diem @ ITE conducted a round of self-checks and rectifications. It found that some teachers simply placed the children's files unattended on their tables, and had to remind them not to do so. It also put up posters to increase awareness of the importance of personal data protection.

By the time the DPTM assessor came down to check on their processes, the centre was well prepared. There were only a couple of gaps that it had to address.

For example, the assessor noted that Carpe Diem @ ITE had a retention

policy but did not establish the retention period for the personal data that was being collected from employees as well as students. To rectify this, the centre set its retention period at five years and updated its retention policy accordingly.

The assessor also noted that the data protection impact assessment did not include approval from the holding company's top management. While Carpe Diem @ ITE explained that their Centre Director Mr Tan was also the Group DPO of the Carpe Diem Holdings, and that his approval would suffice, it nonetheless went on to implement proper management approval for the impact assessment.

AN ONGOING JOURNEY

With Carpe Diem @ ITE certified, Mr Tan is now working with the Carpe Diem Headquarters to encourage the rest of the childcare centres in the group to apply for the DPTM. "We have to beef up our data protection standards in all our centres," he said. "It should be a consistent, ongoing effort. We have attained the trustmark; now it is time to help other centres strive for the same standards."

The data protection journey is an ongoing one. "We start by being compliant with the PDPA, but it doesn't stop there. The DPTM serves as an important milestone in enabling us to demonstrate to parents and employees that we have gone beyond mere compliance to adopting accountable personal data protection practices," said Mr Tan.



DBS Bank

HOW DBS BECAME '001' IN DPTM CERTIFICATION



Senior management buy-in was key to achieving Singapore's first DPTM certification.



MR SHEE TSE KOON
Singapore Country Head
DBS Bank

The number on the Data Protection Trustmark (DPTM) certificate reads "001".

DBS Bank may have been the largest company amongst the pioneering batch of organisations to apply for Singapore's DPTM certification, but that did not stop the financial services giant from becoming the first to cross the finish line.

DBS is one of the leading financial services groups in Asia with a presence in 18 markets globally. It is no stranger to accolades, having been awarded the Global Bank of the Year by The Banker and World's Best Digital Bank by Euromoney last year.

It was also recognised as the Safest Bank in Asia by New York-based trade publication Global Finance for ten consecutive years.

But, as Mr Shee Tse Koon, Singapore Country Head, DBS Bank, pointed out, "Trust is not something that we can take for granted."

NEXT LEVEL

Mr Shee noted that a lot of trust has been built on the bank's financial strength – its capital base, liquidity position and performance – as well as the fact that it is headquartered in Singapore.

But the scope of trust has expanded in recent years. "In this new age where data is a key asset to business success, we want to build upon the strength of our trust to take it to the next level," said Mr Shee.

As a bank, DBS is required to collect data from all its customers, from the mass retail to private banking customers.

For example, when customers open a bank account, the bank has to collect enough data to determine who they are dealing with in order to meet regulatory requirements, and carry out regular reviews to ensure that all the information remains valid.

When giving wealth advice, the bank must assess the customers and their risk appetite. To do this, it needs to have data on the customer's financial standing and past investment behaviour.

In addition to transactional data, the bank also registers the preferences of customers as part of an ongoing process to better understand them in order to provide a better customer experience. It also registers personal data of the directors, beneficiary owners and

presented the DPTM framework to its senior management, they received approval immediately. "It was a no-brainer for us. Trust is very integral to banking," said Mr Shee.

CONCERTED EFFORT

A core certification work group of ten employees was formed to engage various internal stakeholders during the preparatory stage and coordinate the onsite certification visits by the external assessors. The preparation work included gathering necessary evidence such as policy documents and training records to demonstrate the bank's data protection practices. The entire certification process took about four months from the time an external assessor was appointed to when DBS received the certification notification from the DPTM certification body.

onboarding and employee benefits. For Procurement, the assessors examined processes, involving vendors' due diligence and practices in ensuring protection of data. The Information Security team was also engaged to facilitate the assessment of the bank's technical controls for personal data protection.

COMMITMENT

On 9 January 2019, it was announced that DBS was amongst the first of six companies to be awarded the DPTM certification.

"It is a great honour to be the first bank to be certified with the DPTM. It speaks of our commitment to personal data protection," said Mr Shee.

"There is huge value in how we can use data to fulfil the needs and wants of customers and employees," he added. "With a robust framework in place, we're able to properly utilise our data to the benefit of the communities we serve."

Sharing his views on why it is important for financial institutions to work towards the DPTM certification, Mr Shee said, "The financial industry is one where trust is of utmost importance, and the DPTM will provide consumers with that element of trust."



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shareholders of its corporate clients and in some cases, employee salaries as well when their payroll is handled by the bank.

RESPONSIBLE USE

The bank created a set of guiding principles dubbed PURE (Purposeful, Unsurprising, Responsible, Explainable) to oversee responsible use of data. For example, when the bank uses third-party data, it will keep customers informed that it is doing so. "Whichever form of data we have, we apply the PURE principles to make sure we use it for the right purpose," said Mr Shee.

When the DPTM was announced, DBS saw this as an opportunity to seek external validation of its guiding principles, as well as its other personal data protection policies and practices.

When the bank's Group Legal, Compliance and Secretariat team

Management endorsement was critical to the success of the bank's DPTM application. It enabled the bank to put together cross-business, cross-functional teams very quickly and mobilise them in a concerted effort to efficiently manage the anticipated intense certification process.

CLOSE SCRUTINY

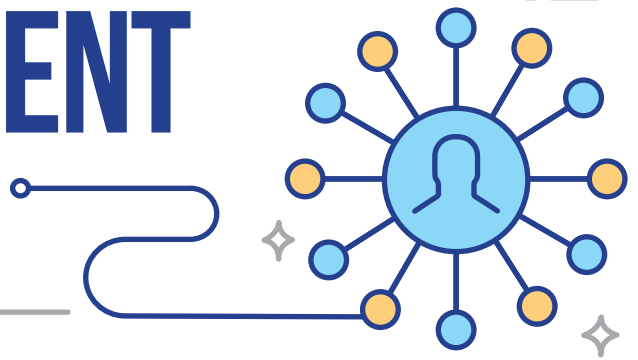
The assessment for the bank's consumer banking franchise involved a detailed review of product managers and operational teams dealing with secured lending, unsecured lending, investments, deposits and insurance products and services. The assessor even visited several DBS branches to check if frontline staff were aware of personal data protection requirements, and to evaluate their handling of personal data.

For Human Resource, the assessors scrutinised teams that handled sourcing,



iColumn

BOOSTING CLIENT CONFIDENCE WITH DPTM



As a data intermediary managing millions of customer records on behalf of shopping malls, iColumn welcomes certification as a way of assuring clients that the personal data under its care is responsibly managed and safeguarded.



MR JASON CHEONG
Chief Executive Officer
iColumn

iColumn is a digital marketing agency that provides a proprietary customer relationship management (CRM) platform for shopping malls to run their loyalty programmes. As a data intermediary, it manages some four to five million customer records on behalf of about 35 malls in Singapore. For the company, a recurring issue is having to assure clients that the personal data under its care is safeguarded at all times.

“Before the Data Protection Trustmark (DPTM) came along, clients were already asking if there were third-party certifications to prove that we had robust data handling and data protection standards,” said iColumn’s Chief Executive Officer Mr Jason Cheong. “When we found out about the DPTM, we were quite excited, knowing that the trustmark could be a testament to our data protection practices and strengthen clients’ confidence and trust in us.”

POWERFUL INSIGHTS

To advise and aid its clients in their marketing efforts, iColumn collects personal, transactional and behavioural information on shoppers who sign up for the malls’ loyalty programmes. This is done through a mobile application developed by the company.

The data flows into iColumn’s system and is analysed to help its clients make better business decisions. Clients can use these insights to personalise and improve their

customers' experiences. For example, relevant and timely offers or coupons can be sent out to individual shoppers, potentially leading to a boost in sales. "It is powerful information for marketing. By studying an individual's shopping behaviour, for example how often they visit particular restaurants or stores, malls can upsell or cross sell products or services that interest them," said Mr Cheong.

PRE-DPTM DAYS

Prior to its DPTM journey, iColumn already had in place policies and processes to ensure that it complied with the Personal Data Protection Act (PDPA) and that the personal data it handled was well protected.

For example, at the contractual level, it signs an undertaking with all its clients that it will not use the personal data beyond the purposes for which consent was obtained and also ensures that this is enforced internally.

At the technical level, iColumn partitions each client's database in such a way that their data is stored separately. This helps to minimise data loss should a breach occur. The company also subscribes to alerts from security partners who monitor vulnerabilities and malware intrusions and flag out systems that need to be patched.

"We have security consultants to look at our whole set-up and how we protect our systems against common attacks," said Mr Cheong.

In terms of internal controls, the company restricts staff from accessing personal and sensitive data. Only senior employees such as the chief developer and the chief database administrator have access to the personal data which they need for their work. To provide

additional safeguards, these staff have a non-disclosure and confidentiality clause in their employment contract and can be held liable if they violate the terms.

Annually, the company also gets audited by its clients, who look at its data protection and information security processes.

THE DPTM JOURNEY

When iColumn embarked on the DPTM certification process, it discovered a gap in terms of its lack of documentation. "What we had was on-the-job training – seniors teaching the juniors what to do," said Mr Cheong. "There was a lack of documented standard operating procedures (SOPs). We implemented data protection measures but did not document our policies and practices properly."

To address this, iColumn focused on developing a process documentation guide and SOPs for its business activities. "This made everything more methodological. It became easier to explain to our stakeholders how our practices are aligned with our data protection policies."

iColumn also took the opportunity to engage staff and clients in conversations about its data protection policies and practices. From staff, it gathered feedback about their experiences in handling clients' data and whether the existing data protection policies were clear to them. For some clients, it reached out to their C-suite executives, IT departments and data protection officers to find out more about their concerns surrounding data protection and how they would like iColumn to address them.

By the time the company was assessed by the DPTM assessment body, it was found to be in compliance with most of



the certification requirements. There were only some missing elements such as not equipping the data protection officer with proper training on data protection, which iColumn swiftly addressed.

GREATER ASSURANCE, BETTER SALES

By and large, the response to the news that iColumn was undergoing DPTM certification was positive, said Mr Cheong.

When it attained the trustmark, an obvious benefit was the strengthening of clients' confidence in the company. "The DPTM shows that we are handling personal data responsibly and that we have robust data protection policies and practices that are compliant with the PDPA. This gives us more credibility. Our clients have more trust in how we handle their data."

The clients, in turn, are able to provide their customers with greater assurance surrounding the protection of personal data collected for the loyalty programmes.

"Knowing that their vendor is certified, our clients can tell their own customers – the shoppers – that their personal data is safe with the malls. This confidence comes from the fact that their vendor is able to demonstrate the capability to protect the personal data that is passed to them to manage."

From a sales perspective, when iColumn meets new clients, having the DPTM also gives it a distinct advantage over other vendors that do not have this certification, said Mr Cheong.

Looking back on the DPTM experience, he shared, "As a data intermediary to the retail industry, it is imperative that we foster a culture of accountability and trust amongst our clients. This helps open doors to more business opportunities as well as strengthen our existing clients' loyalty."

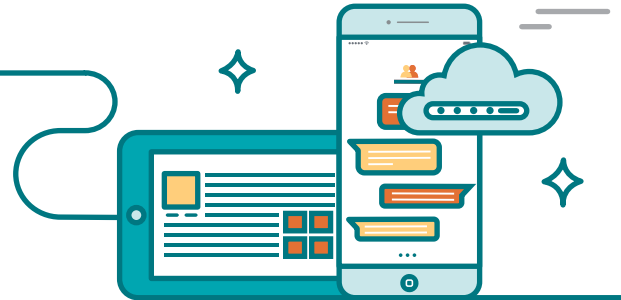


As a data intermediary to the retail industry, it is imperative that we foster a culture of accountability and trust amongst our clients.



M1

THE POWER OF THE DPTM FOR M1



Certification speaks volumes about M1's data protection policies and practices and gives it a business edge as the first telco to be certified.



MR STAMFORD LOW

*Director of Customer Experience & Retail
M1*

The customer engagement frontline is also the data protection frontline.

When the Personal Data Protection Act (PDPA) first came into force in 2014, telecommunications services provider M1 decided that its personal data protection efforts would be driven by the customer service department. This was due to the department's responsibility of handling the bulk of personal data necessary for customer interactions and service delivery purposes.

"We decided the Data Protection Officer (DPO) should come from an operations department, and narrowed that down further to customer service. This is by virtue of the volume of personal data that crosses their hands. We were also conscious that it is not good enough to have just policies and procedures in place – we have to make sure we do what we say we will be doing," said M1's Director of Customer Experience & Retail, Mr Stamford Low.

This tenet was reinforced when the organisation decided to apply for certification under the Data Protection Trustmark (DPTM) scheme. The assessment process helped to enhance awareness and good practices of data protection amongst its customer service staff.

COLLECTIVE EFFORT

M1 provides mobile and fixed line services to over two million customers in Singapore. In the course of delivering these services, it collects personal data such as the customer's

full name, NRIC number, address and contact information for purposes of identification and verification. It also collects usage data such as IP addresses and location. "Protecting this data is vital," said Mr Low.

When the organisation embarked on strengthening its personal data protection efforts in 2014, it established a committee to tighten policies and processes surrounding personal data protection and introduce ways to heighten awareness amongst its staff.

Led by the customer service department, the committee comprised personnel from human resource, engineering, IT, procurement, marketing and other departments across the organisation. This was in recognition of the fact that data protection is a collective effort.

Besides fine-tuning policies and processes, one of the new initiatives implemented was a mandatory e-learning module on protecting personal data that all personnel had to undergo, including the Chief Executive Officer. Such measures placed M1 in good stead when it came to DPTM certification, since they ensured that everyone in the organisation understood his or her role in personal data protection.

COVERING THE 'HOW'

The DPTM was officially launched by the Infocomm Media Development Authority (IMDA) in January 2019, and M1 felt that it would be a good proof point for its efforts in personal data protection. "We saw it as a natural extension of what we were already doing."

To prepare for DPTM, M1 rolled out several initiatives internally, including engaging an external consultant to help identify areas for improvement. This was an organisation-wide effort involving more than 10 departments and over a third of M1's 1,500 staff.



We see value in being the first telco in Singapore to be able to say that a third party has validated that we have got good practices in handling personal data.



There was quite a lot of work to be done. Whilst the company already had policies and processes in place for compliance with the PDPA, DPTM requirements delved much deeper. "PDPA does not really prescribe 'how' something is to be done. But for the purpose of DPTM documentation, we needed to cover the 'how' in greater detail," said Mr Low.

For example, under PDPA's Access and Correction Obligation, customers may request for access to their personal data. While the earlier version of M1's policy had made provisions for such requests, it did not state how quickly this access would be granted. In preparing for DPTM certification, M1 amended the relevant forms and procedures to ensure that the information was stated upfront in the service level agreement for the processing of an access request.

Looking back, Mr Low felt it was a good decision to engage an external consultant in its certification effort. "Having a third party look at what you say you are doing really helped because he was completely unbiased, and was therefore able to look at things through an objective lens."

Another important lesson gained through the pre-DPTM exercise was a better understanding of data protection by design and the advantage of introducing data protection impact assessment early in a product development lifecycle.

"Now, when we come up with new ideas, we start to think about issues relating to consent from customers for the collection and use of their personal data, and address them much earlier in the process."

When the organisation finally applied for certification, the assessment went smoothly with improvements required only in a few areas. In August 2019, M1 became the first telecommunications services provider in Singapore to attain the certification.

CONTINUOUS JOURNEY

Internally, the DPTM has further strengthened the culture of personal data protection across the organisation. The fact that M1 stepped up for the voluntary assessment made its staff realise the seriousness it placed on responsible and accountable handling of personal data.

Even after attaining certification, M1 continues to review and introduce new data protection initiatives. For example, staff training was enhanced to include specific operational scenarios where they would need to handle personal data. It also implemented regular Clean Desk Audits to inculcate good habits and ensure that no personal data is inadvertently left exposed on someone's desk.

VALIDATION

For M1, certification affirms that it is moving in the right direction in terms of personal data protection. "We see value in being the first telco in Singapore to be able to say that a third party has validated that we have got good practices in handling personal data," said Mr Low.

From the business aspect, the certification has helped M1 when it comes to bidding for telco contracts from corporate customers. "When bidding, there is always a section on personal data protection. In the past, we had to spend a fair amount of time and effort to answer related questions. What we do now is simply state that we are DPTM-certified, which is much more impactful, saving both time and effort in contract discussions on data protection matters," said Mr Low.

For consumers, personal data protection is something that resonates with them today. "We see customers taking a greater interest in what is happening to their personal data, so the DPTM comes at the right time," said Mr Low.

MAMORU Singapore

REINFORCING BRAND AND REPUTATION THROUGH DPTM



Mamoru looks to DPTM to strengthen its reputation in the data protection space and grow its business in Singapore.



MR YO OKADA
General Manager
MAMORU Singapore

The Data Protection Trustmark (DPTM) can help foreign companies to establish and grow their presence in Singapore. It affirms their understanding of local data protection laws and proves that they have met the stringent personal data protection requirements of the certification process.

This is the view of Mr Yo Okada, General Manager of Mamoru Singapore.

Mamoru is the first Japanese company in Singapore to be awarded the DPTM. According to Mr Okada, the certification has reinforced the company's reputation as a trusted leader in the secured end-to-end data disposal space. It has also helped the company to build up its personal data protection consultancy business.

PROTECTION AS A BUSINESS

Mamoru means "protection" in Japanese. The company is a wholly-owned subsidiary of Nihon Purple in Japan, which provides information security management and consultancy services for the Personal Information Protection Act and PrivacyMark. These are Japan's equivalent of Singapore's Personal Data Protection Act (PDPA) and DPTM respectively.

A major segment of Nihon Purple's business is the collection and disposal of data, both in the form of paper documents and electronic media.



Our target is not just the Japanese companies. We would also like to do something for the Singapore market, and the DPTM will help us in this regard.



Like its parent company, Mamoru has a solutions business which focuses on the disposal of data. This involves the shredding of paper documents as well as the physical destruction of electronic data stored in media such as hard disk drives, solid state drives and random access memory (RAMs).

Mamoru also has a consultancy business where it advises organisations on personal data protection laws, helps improve their processes, and conducts security risk assessments and information security management workshops.

With a background entrenched in data protection, Mamoru saw the DPTM certification as a good way to demonstrate its alignment with the personal data protection regime in Singapore.

In the shredding business, for example, the company handles a lot of confidential documents which may contain clients' personal data. "We fully understand the importance of managing these documents with care because that's exactly the reason why clients want the documents shredded – to prevent unintended disclosure. This is why we were interested to find out more about the DPTM and to get certified," said Mr Okada.

PREPARING FOR CERTIFICATION

In preparing for the certification, Mamoru put itself through the same process that it goes through with its consultancy services clients – creating policies, learning more about its own business processes, and understanding what kind of personal data it has within the organisation.

For example, although Mamoru is primarily a business-to-business company, it does have a few private customers using its shredding services. In such cases, it may collect personal data such as the

customer's name, address and contact number on delivery receipts.

Going into the certification process, Mamoru had to ensure that there was proper documentation in place on how to handle personal data and dispose of it. "We had to make sure that we had proper rules in place. We re-examined our PDPA compliance manual as well as our own processes and policies, so that we could make changes where we needed to."

Engagement with the company's management was also important. During the certification journey, governance of personal data became a regular topic in management conversations. "Every month, we have a management meeting. When reporting to the managing director in Japan, we would talk about the DPTM application as well as general handling of personal data. If there were any new discoveries or developments, we would share them with the staff so that everyone was on the same page on what needed to be done."

HEIGHTENING AWARENESS

Mamoru also recognised that education and awareness were very important in ensuring that everyone plays his or her part in personal data protection. "Without awareness, we cannot change human behaviour," said Mr Okada.

The DPTM plays a key role in heightening this awareness. "It sets out something visible related to data protection and information security, which is not always very tangible," said Mr Okada.

For example, the DPTM logo is displayed prominently in Mamoru's office and has been incorporated into corporate collaterals such as name cards and other stationery.

"It reminds us that we are certified, so we have to be accountable in how we manage personal data. The certification stimulates a mind-set change in the organisation. It is a plus," said Mr Okada.

Through the certification process, Mamoru also benefited from different perspectives pertaining to personal data protection.

"The third party assessor sees things from a different point of view, so they give us advice from a different angle," said Mr Okada. For example, the DPTM assessor recommended that Mamoru put in place more physical security measures to protect servers containing personal data.

BUSINESS ADVANTAGE

From a business perspective, the DPTM certification has helped to strengthen Mamoru's personal data protection consultancy and led to engagements with companies such as NTA Travel (Singapore) Pte Ltd.

Mamoru also sees the certification as an asset as the company seeks to grow its market share in Singapore. Currently, Japanese firms make up about 90 per cent of its customer base, but the company would like to reach out to other local businesses and MNCs operating here.

"Our target is not just the Japanese companies. We would also like to do something for the Singapore market, and the DPTM will help us in this regard," said Mr Okada. "It enables us to strengthen our branding here."

In his view, foreign companies doing business in Singapore should go for DPTM certification. "It will help them to localise and customise their data protection practices. The DPTM is a visible goal that they can work towards, and with that, the benefits will follow."



MaNaDr

PROTECTING TRUST

AMIDST TECHNOLOGICAL DISRUPTION



The DPTM provides MaNaDr with strong endorsement of its data protection policies and practices as it works towards disrupting and democratising healthcare.



DR SIAW TUNG YENG
Chief Executive Officer
 MaNaDr

MaNaDr was set up by a group of doctors in 2017 with a vision – to make healthcare affordable and accessible to everyone who needs it by leveraging technology. It does this by creating a mobile health platform that allows patients to teleconsult with their doctors wherever they may be, at any time, on any day.

Central to MaNaDr's value proposition is the cultivation of a doctor-patient relationship based on trust, and striking the right balance between business innovation and personal data protection.

In this respect, the Data Protection Trustmark (DPTM) gives a clear indication that the company is on the right track in ensuring good data protection standards. It helps MaNaDr to provide assurance on doubts that patients may have about the security of their personal data. Since attaining the certification, the company no longer gets questions about what it is doing to protect the data.

CRUCIAL ELEMENT

Unlike many new business models emerging in the age of digital transformation, healthcare cannot be "on-demand" where you match your patients with whichever doctor is available, said its founder and chief executive officer Dr Siaw Tung Yeng. This is because the one element that is so crucial in healthcare is trust.

"We don't expect patients to go online to search for a doctor randomly. In my years of practice, patients come to me to ask which specialist they should see," he said.

This is because patients trust the professional recommendations of their own doctors. And thus, one of the most powerful things that MaNaDr has built is a community of trusted doctors for a community of patients and their friends and relatives. Its vision is to connect these two communities so that patients can have access to trusted healthcare providers for guidance and advice through life.

"It is a relationship based on trust," Dr Siaw emphasised. "And in creating this platform, we want to demonstrate that MaNaDr can be trusted as well."

That was why, when the DPTM was announced, MaNaDr decided to put itself through the rigor of getting certified. Prior to that, it engaged a consulting

set from the clinic that is fully secure on an internal encrypted platform; the other is the patient's online persona that is housed separately. This helps to ensure that even if the external data gets breached, the internal data is still secure.

Every service on MaNaDr is also designed to be a micro service. For example, the "Appointment" service is housed in one server, and the "Chat" service on another. "If there is a data breach in one micro service, only that particular one will be affected. They cannot breach the whole ecosystem," said Dr Siaw.

The MaNaDr platform is secured by a two-lock system to protect the source code. The company also makes sure that the data links to member clinics are highly secured and that the clinics sign a compliance document to affirm that their data protection policies and processes are in tandem with MaNaDr's.



training on data protection and fully understands the philosophy behind it.

MaNaDr has about 80 employees globally, including 15 full-time staff in Singapore and development teams in Vietnam and India. All staff – including overseas staff – have to go through the same training and adopt the same processes to ensure that personal data is protected.

"AMAZING" IMPACT

In January this year, MaNaDr was amongst the first organisations in Singapore to receive the DPTM. The certification has had an "amazing" impact on its operations, said Dr Siaw.

He recalled how MaNaDr used to get a lot of questions about the security of data on its platform, and was constantly being asked to prove that it had adequate measures in place. People were reluctant to share personal data such as their credit card details as they were afraid that the information would get stolen.

"With the DPTM, people do not ask about such things anymore. We save time and effort in having to explain our data protection policies and practices to them."

SELLING POINT

Dr Siaw believes the DPTM will also help MaNaDr expand its presence in overseas markets. Having the trustmark enables the company to strike up conversations with like-minded healthcare practitioners in overseas clinics and close more business deals, he said.

"DPTM has become a selling point for the company because it is a trustmark offered by the Singapore government," said Dr Siaw. "A lot of business deals may not factor in DPTM at first, but it gives us a distinct edge in the market when we mention it. Everything else being equal, it can be the deciding factor in many cases."



To me, this is crucial because we are dealing with highly-sensitive patient data. We want to make sure that they are at ease when they share their data with us.



firm to identify gaps in its policies and processes and to find out what it needed to do to plug those gaps.

"To me, this is crucial because we are dealing with highly-sensitive patient data. We want to make sure that they are at ease when they share their data with us," said Dr Siaw.

UNIQUE DATA STRUCTURE

Going into the certification process, the company deduced that it had already met about 90 per cent of the DPTM requirements at the onset.

From day one, MaNaDr made sure that it encrypted all personal data that it had. It specifically designed a unique data structure with two sets of portfolios for each patient. One comprises a data

STANDARDISING PRACTICES

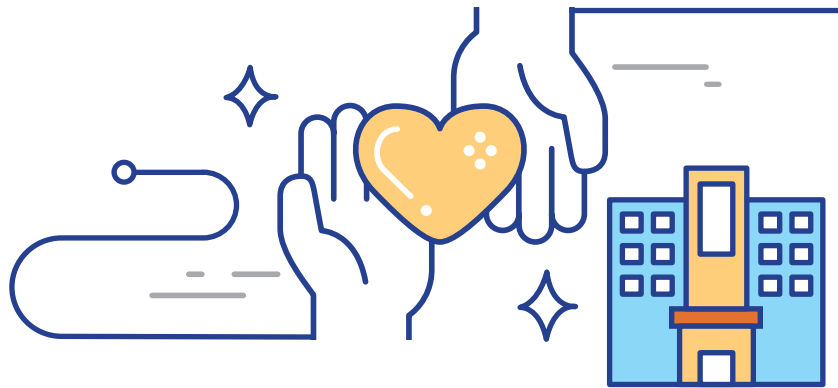
For MaNaDr, the DPTM certification process has helped to reinforce the company's personal data protection regime.

"We may not always be aware of blind spots in our processes. As we went through the DPTM certification, we learnt how to identify deficits in our system and what we had to do to plug those gaps," said Dr Siaw.

As part of the DPTM assessment, the company formalised and standardised its personal data protection practices. Policies and processes were documented and a personal data protection manual was produced to ensure that anyone who joins the company has access to systematic

New Hope Community Services

HELPING PEOPLE IN CRISIS



The DPTM is part of New Hope Community Services' data governance priority, enabling it to strengthen public trust in the social services space.



MS LEAH TAN

Centre Manager
New Hope Community Services

Its beneficiaries are people in crisis – homeless men, women and families. In rendering them help, New Hope Community Services knows it is vital to protect their personal data as well. It is part of the organisation's overall push to ensure good governance and strengthen public trust.

And this was the reason why New Hope decided to apply for the Data Protection Trustmark (DPTM) when the certification was announced. Having achieved the Charity Governance Award in 2017 and received the Charity Transparency Award for three consecutive years from 2016 to 2018, the DPTM certification was a logical next step for the organisation.

DEALING WITH PERSONAL DATA

New Hope started its services in 2004 with one shelter for homeless male ex-offenders. In 2007, it expanded its scope by collaborating with the then-Ministry of Community Development, Youth and Sports (now Ministry of Social and Family Development or MSF) to look into arranging housing for other homeless individuals and families.

In carrying out its work, New Hope needs to have information not just about its beneficiaries but also their family members, especially those who will be staying together in the rental flats, said Ms Leah Tan, Centre Manager (HQ) and Data Protection Officer (DPO), New Hope Community Services. For example, the personal data it has to gather

includes information on the beneficiaries' children and the children's schools.

When helping its beneficiaries to apply for rental flats, it also needs to have other personal data such as the beneficiaries' financial information – how much savings they have and their outstanding debts – in order to find out if they are eligible for assistance.

FUNDING SUPPORT

To ensure that all this information is well protected, New Hope's founder and Chief Executive Officer Pastor Andrew Khoo and its Chief Operating Officer James Chua initiated the organisation's personal data protection drive. They wanted to engender trust amongst donors and beneficiaries by making sure that its policies and practices were aligned with the Personal Data Protection Act (PDPA).

In 2014, soon after the PDPA came into effect, New Hope put in place the basics of personal data protection. It appointed a DPO, and published its DPO's contact details and PDPA notice on its website.

Subsequently, when it learnt that Citrep+ (Critical Infocomm Technology Resource Programme Plus) funding was available for the training of DPOs, it decided to apply for the grant and sent ten staff representing different departments, including the DPO, for a Hands-On DPO Training course.

TRANSLATING POLICIES

TO PRACTICE

After the training, the representatives formed a committee to drive the organisation's data protection initiatives. The committee sat down to map out the organisation's data inventory and identified processes that presented a risk to personal data protection. Next, it looked into policy development for the respective departments and for the organisation as a whole, and put in measures to translate these policies into practice.

"It was important that we did not stop at just developing policies. We had to prepare the people and constantly remind them about good personal data protection practices," said Ms Tan.

For example, reminders were sent out to staff to be extra careful with case files that

contained personal information about their beneficiaries. Only people working directly on the cases were authorised to access these files. Even administrative staff supporting the programmes were not allowed to have access to the details of the cases.

With its personal data protection policies and practices in place, New Hope decided to go for the DPTM certification because it saw the trustmark as a good test of its efforts in putting in place measures to comply with the PDPA.

A LEARNING EXPERIENCE

The certification process was tough, said Ms Tan, but it helped the organisation to further strengthen its policies.

For example, the DPTM self-assessment checklist introduced a requirement on data protection impact assessment. This underscored the importance of carrying out a personal data risk assessment based on the functions and needs of the organisation, and implementing the appropriate measures to address these risks.

Some of the "dos" include logging out of the desktop and putting documents away when leaving the desk, and making sure that application forms are not left lying around in case the personal data they contain are inadvertently exposed to people who should not have access to the information.

Simple solutions were also implemented to help the staff protect personal data. For example, "Confidential" stickers are provided so that staff can stick them onto documents with personal data. The stickers provide a visual indication and reminder that a document contains personal data, so that the staff will take more care to ensure that the said document is adequately protected, for example, by keeping it in a locked cabinet or drawer when not in use.

AN ONGOING EFFORT

Attaining the certification was an important milestone for New Hope. "Nowadays, charity governance is a very big thing. We may get into trouble if we don't do things right," said Ms Tan. "Also, there are so many charities, and

When donors are deciding which organisation to support, the DPTM helps by providing us that trust factor.



Using a data protection impact assessment template from its external consultant, the organisation listed down the personal data that it collected, where it was stored, the risk level of the data, what would happen if the data were to be exposed, and what action the organisation would take if this were to happen.

DOS AND DON'TS

It also came up with a list of "dos and don'ts" to help staff make the connection between personal data protection and their everyday tasks. For example, one of the "don'ts" on the list is that staff should not leave their printouts unattended at the photocopier. "Sometimes, we don't know who the printouts belong to because no one collects them. This exposes the personal data on the printouts to other people who may not be authorised to view the information," said Ms Tan.

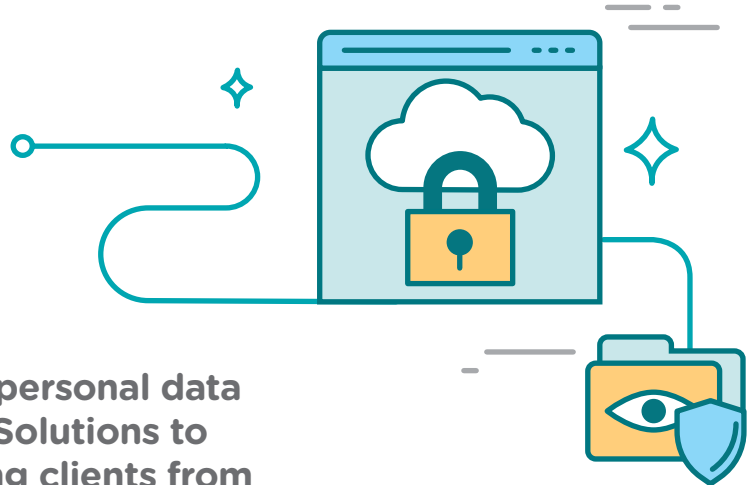
people don't know who to trust. When donors are deciding which organisation to support, the DPTM helps by providing us that trust factor."

New Hope also knows that the personal data protection effort does not stop here. "Having achieved the DPTM, we must continue to find opportunities to let people know that we are not just PDPA compliant, but that we take everyone's personal data seriously," said Ms Tan. "Because we are DPTM-certified, all the more we must be on our toes and be able to demonstrate our accountability in practice to the rest of the social services sector."

P2D Solutions

WALKING THE TALK

Attaining the DPTM enables personal data protection consultancy P2D Solutions to demonstrate that it is advising clients from the point of experience.



MR DESMOND CHOW

Director
P2D Solutions

For P2D Solutions, attaining the Data Protection Trustmark (DPTM) is about proving that the company walks the talk.

P2D was set up in November 2014 to provide end-to-end services to businesses that need help getting started on their personal data protection journey. "The big boys have law firms guiding them, and larger companies tend to have more experience responding to regulatory requirements. SMEs are the ones that need the most help," said P2D Solutions' Director Mr Desmond Chow. "We hold their hands through the entire process. We take the heavy lifting away from them."

This includes helping clients to scope out the whole personal data protection effort and helping them to do data inventory mapping, which will serve as the foundation for the entire personal data protection initiative going forward.

BUSINESS SENSE

As a company providing personal data protection consulting services, P2D saw the DPTM certification as a means to boost its credibility, and hence it made business sense to go for the trustmark. "If we are in this space giving advice to others, at the very least, we have to make sure what we give others is rigorous enough to stand up to the assessment."

The company's certification process started in November 2018 with a self-assessment. It conducted an internal review, went through all its documentation on processes and policies, and made sure all outstanding gaps were attended to. "Going through



We do not only say we can do it, we have demonstrated that we have done it, so we know what challenges are involved.



the process was important if we are going to advise our clients on what is needed," said Mr Chow.

BENEFITS OF DPTM

In March 2019, P2D attained the DPTM certification. Reflecting on the milestone, Mr Chow said the trustmark provides P2D's clients with reassurance that their personal data is protected and "by association, the policies and processes that we have done up for them are sufficiently robust".

From a business perspective, the DPTM has also helped to open up new opportunities for the company, which launched a set of services to help clients prepare for the certification.

"Before they even sign up for the DPTM certification, or before the assessment bodies visit them, we go in and help them improve their systems to the point that they can pass the assessment."

"We have experienced what it was like. When we talk to clients who want to go for DPTM, we know what they are in for. We can then give good advice."

NO SHORTCUTS

One of the key things he tells his clients is that the basics need to be in place before they put themselves through the certification.

"The first question I ask them is: Do you have anything in place? If not, then put DPTM on hold, ensure basic compliance first. You need to start with the basics and work your way up. You cannot shortcut the process."

For example, he advises companies that they have to first put in place measures to meet the obligations of the Personal Data Protection Act (PDPA) such as

appointing a competent Data Protection Officer, and having in place a proper data protection management programme as well as proper PDPA policies, practices and training.

He also advises companies on the need for proper documentation of personal data protection policies, processes and procedures. Examples include having a data breach management plan, data protection impact assessment and code of conduct for staff on how to manage personal data.

"If you have the processes in place but they are not documented, it does not work for the DPTM certification. You need proper documentation to support your processes and practices," said Mr Chow.

THE PEOPLE FACTOR

Another piece of advice he has for clients is to pay attention to the people factor. "Your system is only as strong as its weakest link – people. Human beings are predisposed to make mistakes and this is something that all organisations have to pay attention to. While you may not be able to totally eliminate the risk of human error, with proper data protection policies, practices and training, you can mitigate the potential impact of these errors."

For example, companies need to ensure that they conduct regular training for their staff including contract and temporary staff.

"I cannot stress enough the importance for all staff to maintain a high level of awareness of PDPA," said Mr Chow. "Whether you are management or rank and file, you have a role to play."

He pointed out that during the DPTM certification process, the assessor will come in and talk to the staff on the ground to assess their understanding of personal data protection. "No matter

how much work you put in, you need to distil it down to what is essential to the frontline staff."

For example, staff who man the reception counter will need to make sure forms are locked up properly, and that documents containing personal data are disposed of in a proper manner.

"Our challenge is that when we train the rank and file, we have to translate the PDPA obligations into bite sized chunks that they can digest," said Mr Chow. "We need to change the mind-set that 'I don't get paid enough to pay attention to that'."

HELD TO A HIGHER STANDARD

Having gone through the certification process, P2D is acutely aware that with the DPTM, the company is being held to a higher standard. "The awareness needs to be even higher, and the company's internal policies need to be even stricter. DPTM, in that sense, is about doing the fine-tuning for us to get our processes to a higher level of efficiency," said Mr Chow.

In his view, the certification will help set apart companies that are willing to take that extra step to protect their customers' personal data. "Eventually, it will be a market differentiator between those that can do it and those that can't. Those who are certified will have that distinct advantage in their business," he said.

As for P2D and its compatriots in the personal data protection consulting space, the case for the DPTM certification is clear. "We have to walk the talk. We do not only say we can do it, we have demonstrated that we have done it, so we know what challenges are involved. We are advising you from the point of experience and not just theoretical knowledge."



Shangri-La Hotel, Singapore

CHAMPIONING PERSONAL DATA PROTECTION FOR TRUST AND LOYALTY



A committed team of Data Protection Champions played a key role in DPTM certification for Shangri-La Hotel, Singapore by ensuring that its 1,000 strong workforce was accountable in following good data protection practices.



MR TANE PICKEN
General Manager
Shangri-La Hotel, Singapore

Achieving the gold standard in personal data protection is not a single person's effort. At Shangri-La Hotel, Singapore, Data Protection Champions in every department played a significant role in the hotel's success in attaining the Data Protection Trustmark (DPTM).

Shangri-La Hotel, Singapore comes under the umbrella of one of Asia-Pacific's leading luxury hotel groups - Shangri-La Hotels and Resorts. As part of the hotel's operations and for security reasons, it collects personal data such as the guests' full name, passport number, credit card details, contact number and country of origin during check-ins, as well as information such as age and date of birth for its loyalty programme. It also retains personal data of all its employees for administrative purposes. This includes their identification details and medical history.

"We have the responsibility to keep all this data well protected," said Mr Tane Picken, General Manager of Shangri-La Hotel, Singapore. "Personal data protection is part of our hotel's daily operations and our colleagues are trained to ensure that this data is secured and handled with care."



This certification is testament to our hotel's commitment to protecting the privacy, confidentiality and security of the personal data of our guests and colleagues.



APPOINTING DATA

PROTECTION CHAMPIONS

As a group, Shangri-La Hotels and Resorts has had comprehensive data protection guidelines and policies in place since 2008 to ensure that its data management practices are compliant with the personal data protection laws of the countries that they operate in. It also conducts compulsory annual audits on all its hotels and resorts to ensure that the directives are updated and adhered to.

For Shangri-La Hotel, Singapore, a more specific set of guidelines was put in place in 2012 to align its personal data protection policies and practices with the Personal Data Protection Act (PDPA).

One of the steps that the hotel took was to appoint a Data Protection Officer (DPO) to ensure that the personal data of its guests and employees was managed properly, with adequate safeguards in place to prevent unintended disclosure. The DPO also helps to ensure that the hotel's data protection policies and processes are up to date.

But it did not stop there. In March 2019, Shangri-La Hotel, Singapore took the further step of appointing a Data Protection Champion in each department to oversee internal communications and staff training in personal data protection.

This role proved to be key when the hotel embarked on DPTM certification later the same year.

PREPARING FOR DPTM

The decision to go for third-party certification was seen as a strategic

move for the hotel. "In the hospitality industry, trust is key to driving our business and strengthening the relationship we have with our guests and clients," said Mr Picken.

"Going for the DPTM certification underscores our company's stance in data protection, assuring our guests, clients, partners and employees that we value their faith in us and strive to treat their personal data with care and respect."

Third-party certification also served as a validation that the hotel's personal data protection guidelines and policies were compliant and relevant from an independent perspective.

But the preparation for DPTM was not without its challenges.

For Shangri-La Hotel, Singapore, one of the things it had to do was to ensure that each and every one of its 1,000 employees was adequately trained in personal data protection. Although the hotel already had an extensive set of data protection policies in place, this was still a formidable task because of the number of staff involved.

And this is where the Data Protection Champions came into the picture.

A working committee was established with Data Protection Champions playing an active role in raising employees' standards in personal data protection within each department. This was done through regular briefings and training.

The champions also helped to disseminate data protection information promptly to keep staff updated, to minimise lapses.

"This internal communication is paramount in ensuring that the right

procedures are being conveyed to our colleagues who are responsible for collecting guest data and making sure that new colleagues are properly trained on how to handle personal data before they start work," said Mr Picken.

In addition to this, the Shangri-La Academy rolled out an e-learning course on data protection, which was mandatory for all employees.

The hotel also appointed an external party to assist in its preparation for the DPTM certification. The consultant helped to identify high-risk areas and data protection gaps that were quickly addressed.

A FIRST FOR THE HOTEL

SECTOR

In all, it took about six months from the start of its preparations to becoming the first hotel in Singapore to be awarded the DPTM.

"This certification is testament to our hotel's commitment to protecting the privacy, confidentiality and security of the personal data of our guests and colleagues. It definitely provides a mark of trust for our guests, and also lends a stamp of accreditation for our business partners as well," said Mr Picken.

Reflecting on the importance of DPTM to the hospitality industry as a whole, he emphasised that data protection is a key area that management should look at, especially for companies that handle large volumes of customer information. If some of this data were to land in the wrong hands, it could have a detrimental effect on a customer trust, the hotel's business, and the reputation of the industry as a whole.

And that is why for Shangri-La Hotel, Singapore, the data protection effort has to be a continuous one. "It is important to keep the conversation on personal data protection ongoing, to ensure that it stays top of mind and we remain vigilant in our data protection practices," said Mr Picken.



TRIS Forensics

ACHIEVING A COMPETITIVE EDGE IN THE GLOBAL MARKET



Backed by IMDA, the DPTM helps TRS Forensics stand out in the crowded risk consultancy space.



MR TAN SWEE WAN

Chief Executive Officer
TRS Forensics

Competition was intense. TRS Forensics was up against a field of well-known international competitors bidding for a high-value forensics technology project. But it had an ace up its sleeve. The company's Data Protection Trustmark (DPTM) caught the eye of the client, a large multinational company from the European Union (EU), and it went on to secure the contract.

TRS Forensics is a Singapore-based risk-consultancy firm that aims to go global by demonstrating that its data protection policies and processes are aligned with international standards. The DPTM has given the company a competitive advantage in this respect, as it is based on Singapore's Personal Data Protection Act (PDPA) as well as international benchmarks and best practices, said TRS Forensics' chief executive officer Mr Tan Swee Wan. The fact that Singapore's IMDA is the certification body strengthens the legitimacy of the certification to consumers and businesses in other countries.

PERSONAL DATA IN RISK

CONSULTANCY

Established in 2017, TRS Forensics saw an opportunity to deploy technological solutions to speed up and automate audit and accounting functions, as well as to offer a full range of risk consultancy services.

The company's areas of expertise include internal audit, investigation, and cybersecurity advisory services.

In the course of its engagement with clients, TRS Forensics handles a lot of personal data. In internal audit, for example, a client may want the company to look at payroll processes and records. To do so, TRS Forensics would need access to payroll as well as transaction records containing names, national identification numbers, bank account numbers and salary information.

As part of its cybersecurity services, the firm may conduct penetration testing, which involves going into the company's network with the client's permission. Sometimes in the course of an investigation, it may require access to client's affected personal data and other sensitive data as part of the evidence-gathering process.

"NEED TO KNOW" BASIS

Given the nature of the data that it has access to, TRS Forensics makes it a point to ensure that it has processes and procedures in place to safeguard clients' and employees' personal data.

It places restrictions on who can access what data. For example, access to all the engagement files is granted on a "need to know" basis. It has clear policies and internal procedures to safeguard the data, covering how it receives the data, what kind of consent it has to obtain, how it stores the data, what data needs to be encrypted, and how the data is to be destroyed at the end of the engagement.

When the company first learnt about the DPTM through the media, it decided that this was a good certification to work towards.

"The DPTM presents a lot of advantages," said Mr Tan. "It allows us to test our own processes and procedures to see if what we have put in place can be benchmarked against international recommended practices. This enables us to show proof to our clients that we have a robust mechanism to protect important data. We are also giving assurance to our own employees that the data they entrust us with is well protected."

CERTIFICATION JOURNEY

TRS Forensics' certification journey began in October 2018 with a self-assessment. This was followed by an assessment conducted by an independent body from IMDA's appointed panel.

"The key thing we gained was having an independent third party to take a look at what we have implemented. Although we are in the industry and we offer cybersecurity and data protection services, it is always good to have an external pair of eyes to scrutinise our processes," said Mr Tan.

The DPTM also proved to be an advantage when the company bid for a technology forensics project earlier this year. "We were the only Singapore-based firm invited to pitch because of our credentials," said Mr Tan. "The client's legal counsel agreed that the DPTM was a good thing to have."

This was because amongst the requirements of the DPTM were principles based on international requirements and guidelines, such as the EU's General Data Protection Regulation (GDPR), the Asia-Pacific Economic Cooperation (APEC) Privacy Framework, and the Organisation for Economic Co-operation and Development (OECD) Guidelines on the Protection of Privacy and Transborder Flows of Personal Data. When a DPTM-certified company operates in these geographies, the trustmark provides its clients with the assurance that the company's data protection policies are aligned with international best practices.

THE SINGAPORE FACTOR

As a government-backed certification scheme, the DPTM is also a strong selling point for Singapore companies looking to expand into the region.

"There is a lot of trust in the Singapore government. We get a lot of work because of Singapore's reputation. So it helps that

the DPTM is administered by the IMDA," said Mr Tan. "This gives us an edge compared to other overseas competitors."

Mr Tan cited the example of a client in Malaysia, an e-wallet company, which was willing to pay more for a DPTM-certified Singapore company with a presence in Malaysia. "They are willing to pay a premium for the trust and recognition," he said.

Last but not least, the DPTM has also enabled TRS Forensics to communicate clearly to its employees the importance of personal data protection.

"From day one, we have had policies and processes, but as known in any cybersecurity or data protection scenario, human beings are usually the weakest link. We have to constantly remind our employees to be vigilant," said Mr Tan.

The certification process helped drive home this point when the employees were interviewed by the independent assessor. "Having a third party talk to them brings out the importance of being vigilant and shows that the company is dead serious about data protection," said Mr Tan.

"The DPTM certification process enabled us to improve what was already a strong system, and to also send the right message to our employees. This strengthens our reputation in data protection and gives our clients the confidence that we practise what we preach."



BB

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DD

TTSH Community Fund

GOING BEYOND COMPLIANCE TO UPHOLD TRUST WITH DONORS AND BENEFICIARIES



Trust is the cornerstone of the charity sector. With the DPTM, Tan Tock Seng Hospital Community Fund shares how it has progressed from compliance to accountability to sustain that trust.



MS EUNICE TOH
Executive Director
TTSH Community Fund

Trust is of paramount importance to a charity. "It is not only about ensuring trust with the giving public, but also the beneficiaries who need to have confidence that their personal data will not be exposed," said Ms Eunice Toh, Executive Director of the Tan Tock Seng Hospital (TTSH) Community Fund. This includes data such as the beneficiaries' socioeconomic status and the medical condition and history of patients, which is very personal information.

To uphold this trust and the confidence of its stakeholders, TTSH Community Fund made a concerted move to elevate its data protection approach from compliance to accountability. This meant going beyond complying with rules, to taking proactive steps to protect personal data. "We want to strive to a higher level, and having a third party to certify our standards will make it more objective," said Ms Toh.

It was for this reason that TTSH Community Fund applied for the Data Protection Trustmark (DPTM) and went on to become the first charity organisation in Singapore to attain the certification.

CHARITY ARM

TTSH Community Fund is the charity arm of Tan Tock Seng Hospital. It has more than 100 programmes focusing on four main areas – research and innovation, training, patient care and most importantly, needy patients.

"We catch those cases that fall through the cracks, or where traditional charities cannot adequately help them," said Ms Toh.

For example, a TTSH Community Fund programme called "Help Me Go Home" supports needy patients by paying for the costly breathing equipment that they will need when they are discharged. This helps to ensure they can continue to breathe properly, which affects their quality of life.

The charity also helps to cover basic but necessary out-of-pocket expenses ranging from spectacles, dentures and milk supplements to ambulance fees and taxi fare for the physically challenged who need to go to the hospital for follow-up consults.

As a charity, TTSH Community Fund collects personal data of donors and beneficiaries to service them better. It also collects personal data of staff and volunteers to determine that they are suitable for the job.

For example, medical social workers who refer patients to TTSH Community Fund will provide the charity with the beneficiaries' personal particulars, some brief information on their medical condition, as well as background information such as their sources of income, type of housing, number of children, family history and other related details.

PROACTIVE STEPS

TTSH Community Fund was an early adopter of the Personal Data Protection Act (PDPA). As early as 2014 when the Act came into force, it took concrete steps to protect personal data. It started with the review and development of templates, policies and standard operating procedures for personal data protection. "I got my team to sit down to think about their processes, and to review and revise policies and procedures for better and more effective buy-in and ownership," said Ms Toh.

For example, before featuring patients in any of its publicity materials, the staff learnt to be mindful about getting their permission, explaining to them exactly what information would be collected and why, and how it was going to be used.

Having thought through its policies and processes and put them into practice, TTSH Community Fund then embarked on developing its own personal data protection manual.

The manual was subsequently incorporated into the staff on-boarding process, ensuring that new hires are in sync with the organisation's personal data protection policies and practices. Ms Toh also conducts regular PDPA updates through internal platforms such as weekly "roll-call" meetings and departmental meetings, to ensure that staff are kept up to date with the latest developments in the PDPA and that all issues are looked into and clarified.

CHECKS AND REFERENCES

When the DPTM was announced, Ms Toh saw it as a good opportunity to put the organisation's data protection policies and practices to the test. "I knew that my team had moved forward, but did we really cover all our bases? I felt it would be good to get a third party to assess this."

Having worked in audit during the early part of her career, Ms Toh believes in the need for checks and monitoring "to ensure that things are in good order".

"It made sense for us to get certified, because then there is a benchmark for us to measure where we are and which areas we can improve on," she said.

During the certification process, TTSH Community Fund found that the DPTM self-assessment portion was not a problem. "We were able to fill in the answers quite easily," said Ms Toh. "The real test was when the assessors came on board to validate our standards."

"When you are being assessed, it makes you look into all aspects of personal data protection, big or small," she said.

The organisation realised that it had certain blind spots such as the handling of personal data of staff seconded to the organisation. It took steps to ensure that data on all staff – including those who were there on secondment – was accurate and up-to-date.

By and large, however, the assessors were impressed by TTSH Community Fund's focus on personal data protection, the effort that it had put in, the progress that it had made and its commitment to personal data protection.

A ROBUST STANDARD

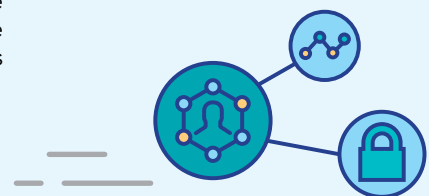
For TTSH Community Fund, attaining the DPTM has helped the organisation build trust with its stakeholders and partners who include beneficiaries, donors, staff, vendors and the hospital itself.

"For a charity, to be trusted is integral. The DPTM is a robust standard. It shows that appropriate governance is in place where data protection is concerned. It gives people confidence in us."

This was important not just for TTSH Community Fund but also for the charity sector as a whole, said Ms Toh, who sits on the organisation's board and also advises other charities. She often takes the opportunity to share her organisation's DPTM experience with these other charities, and the response has been positive.

"They see the DPTM as a milestone achievement and expressed motivation to pursue the same for themselves. It is something tangible to strive towards and they are inspired."

As the charity sector moves forward with personal data protection and as more organisations get certified, personal data protection standards will naturally be raised across the industry as a whole, said Ms Toh. In the process, public trust will be strengthened. "We are all here to do good, all serving the community, so at the end of the day, everyone gains. I think that is fantastic."



The DPTM is a robust standard. It shows that appropriate governance is in place where data protection is concerned.



DPTM CERTIFICATION CHECKLIST



Take the first step by referring to this quick checklist to gauge your organisation's readiness in becoming DPTM-certified.

Governance and Transparency	<input type="checkbox"/> Does your organisation have policies and practices in place to manage personal data, and communicate these policies and practices to stakeholders?
	<input type="checkbox"/> Does your organisation conduct risk and impact assessments to identify, assess and address data protection risks?
	<input type="checkbox"/> Does your organisation have a data breach management plan?
Management of Personal Data	<input type="checkbox"/> Does your organisation ensure that the personal data collected is necessary for the purpose, and individuals are notified of the purposes on or before the collection of their personal data?
	<input type="checkbox"/> Does your organisation obtain consent for the collection, use or disclosure of personal data?
Care of Personal Data	<input type="checkbox"/> Does your organisation have appropriate security policies, practices and measures to protect personal data?
	<input type="checkbox"/> Does your organisation have appropriate data retention and disposal policies and processes for different types of personal data?
	<input type="checkbox"/> Does your organisation ensure that its personal data is accurate and personal data disclosed to other organisations is accurate and complete?
Individual's Rights	<input type="checkbox"/> Does your organisation provide information on how individuals may withdraw consent, and request access and correction of their personal data?
	<input type="checkbox"/> Does your organisation have processes to handle requests for access, correction and withdrawal of consent of personal data?



To be DPTM-certified, organisations must provide documented evidence of data protection policies/processes to IMDA, as well as demonstrate the implementation and actualisation of these policies/processes.

For the full checklist and more information about the application process, please visit www.imda.gov.sg/dptm.

FAQs

1 What are the requirements that my organisation has to fulfil to apply for the DPTM certification?

Your organisation should have put in place a data protection regime to comply with PDPA obligations. It should also strongly advocate active accountability, beyond mere compliance, in personal data protection. Furthermore, your organisation must be either (1) formed or recognised under the laws of Singapore, or (2) resident, or having an office or place of business, in Singapore, and in any case, not a public agency (as defined in the PDPA 2012).

2 What is the cost to apply for the DPTM certification?

There is an application fee of \$535 (inclusive of GST) payable to IMDA. Your organisation will also have to engage an Assessment Body (from the IMDA appointed panel) to conduct the certification assessment. Actual assessment fee will be confirmed by the Assessment Body.

Grants and subsidies are available.

3 Is funding support available for the DPTM certification?

Enterprise Singapore offers support for Singapore companies through the Enterprise Development Grant while the National Council of Social Services offers support for social service organisations through the Organisational Development Grant.

The funding will cover (1) third-party consultancy fees if your organisation wishes to engage professional consultancy services to prepare for the DPTM certification, as well as (2) assessment fees payable to the selected DPTM Assessment Body.



4 Who will conduct the DPTM assessment?

DPTM assessment can only be conducted by an IMDA appointed panel of assessment bodies. Upon successful application of the DPTM certification, your organisation may select any of the five assessment bodies (BSI Group Singapore Pte Ltd, EPI Certification Pte Ltd, ISOCert Pte Ltd, Setsco Services Pte Ltd and TUV SUD PSB Pte Ltd) to conduct an assessment of your data protection policies and practices.

5 Will Personal Data Protection Commission (PDPC) consider the DPTM certification as a mitigating factor in the event of a data breach?

Obtaining the DPTM certification means an organisation has demonstrated good data protection policies and practices including drawer plans to deal with data incidents, and it may serve as a mitigating factor in the event of a data breach.

Under the PDPC's Active Enforcement Framework, the PDPC and/or an organisation that is able to demonstrate accountable data protection practices, for example having the DPTM certification, may initiate an undertaking process. The organisation must be ready to implement remediation of the data breaches and take steps to prevent recurrence. The undertaking process is to provide such organisations more efficient resolution and improve their processes.

More information on the undertaking process can be found in the [Guide on Active Enforcement](#).

6 Is the DPTM certification recognised overseas?

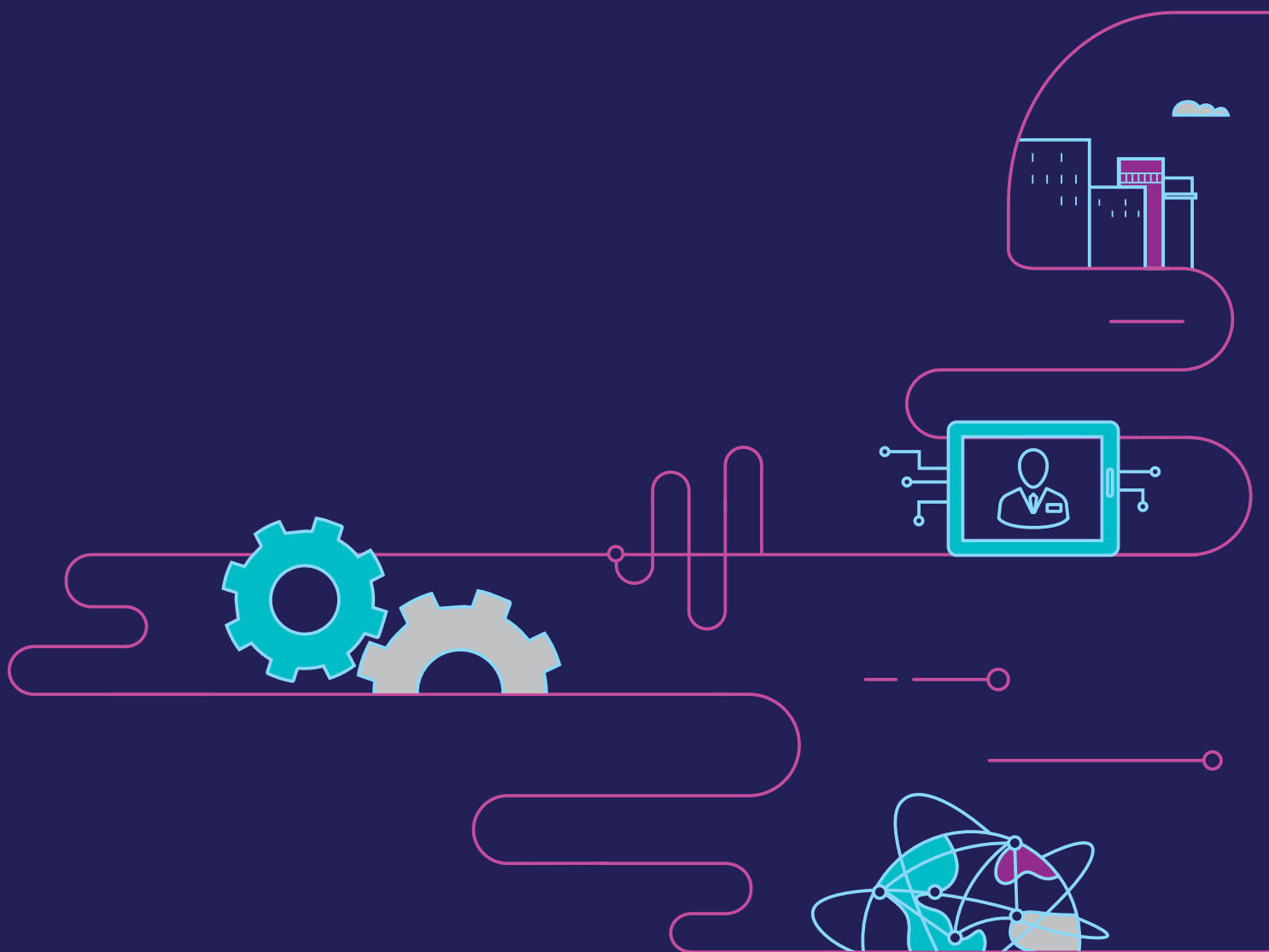
The DPTM is a local certification scheme. Depending on regional developments, IMDA may explore mutual recognition of similar certifications with other countries.



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