

MANAGING DATA INTERMEDIARIES UNDER THE PDPA

In today's data-driven economy, organisations often outsource data processing activities to data intermediaries (DI). To provide assurance for customers and enhance their business competitiveness, organisations should ensure accountability by referring to the key considerations listed in the DI Management Lifecycle.



A) GOVERNANCE AND RISK ASSESSMENT

- Establish a governance structure for data processing by the DI
- Establish the objectives and requirements of the data processing to be outsourced
- Understand the risks involved
- Ensure that the DI is able to meet the requirements and have the necessary data protection framework

For complex data processing activities

- Consider engaging DIs with the **Data Protection Trustmark (DPTM) Certification**

B) POLICIES & PRACTICES

- Establish clear communication channels
- Have a binding contractual agreement
- Tailor operational procedures to the scope of the outsourcing

For complex data processing activities

- Review details like the schedules to the contract and other administrative instructions to the DI
- Have appropriate standard operating procedures (SOPs)
- Define the format and frequency of reports from the DI
- Establish an escalation process and a reporting chain for incident reporting

D) EXIT MANAGEMENT

- Establish exit management plans and time frames for the DI to cease retaining the personal data
- Ensure that work done is documented
- Conduct exit audits and checks
- Ensure any data migration or transfers is done securely
- Apply the DI Management Lifecycle for any new DI

C) SERVICE MANAGEMENT

- Have a kick-off meeting
- Have the appropriate level of representation in meetings
- Conduct regular and ad-hoc meetings

For complex data processing activities

- Develop an on-boarding process and use the briefing as a basis for any structured training
- Consider proactive monitoring by having database logs and monitoring access
- Consider conducting audit exercises and on-site inspections
- Consider simulations and table-top exercises

