

Annex

**Public Consultation on the Proposed Business Operation of the Do Not Call Registry by
Personal Data Protection Commission, Singapore (“PDPC”) dated 15 May 2013**

1. Question 2

CSPL Comment:

We would like to clarify whether only one contact person be registered under the main account? From a corporate governance perspective, it may not be prudent to leave the administration/contact of the main-account to only one employee. We would like to propose the possibility of for example registering a common email address that may be accessible by 2 or more employees and listing the names of all these employees as the relevant contact persons.

2. Question 3

CSPL Comment:

(a) We would like to understand PDPC’s rationale for limiting the number of sub-accounts given an administrative fee will be charged for each sub-account creation. Our view is that such a limit may be unduly restrictive especially for large organizations.

(b) We would like to know whether the notification email in response to a search by a sub-account holder will be sent only to the email of the sub-account holder or to email of main-account holder as well. We are proposing notifications to both account holders for better control by the main account holder.

(c) We would like to know whether searches be conducted from a main account or only from a sub-account? We recommend that they can be conducted from either account for flexibility.

3. Questions 4 and 5

CSPL Comment:

(a) We would like to seek PDPC’s clarification as to whether Part IX of the Act applies to any organization (whether foreign or Singapore registered) (“3P Service Provider”) who has been engaged by a Singapore registered organization (“Organisation”) to, for example, conduct telemarketing services on the basis that it falls under the definition of “sender” under section 36(1) of the Act.

(b) Assuming that the obligations of Part IX of the Act fall on both the 3P Service Provider as well as the Organization (as the party authorizing), we would like to seek PDPC’s clarification as to whether, if in the contract between the 3P Service Provider and the Organisation, the obligation to conduct the checks with the DNC Registry is imposed on the service provider, such contractual provisions will constitute the Organisation as having taken reasonable steps and deemed not to have authorized

the sending of the message under Section 37(4) of the Act. If so, we propose that foreign organizations should be allowed to register their own accounts with the DNC Registry.

- (c) We would further like to seek PDPC's clarification on a situation whereby the Organisation outsources for example telemarketing services to the 3P Service Provider and where the database of phone numbers belongs to the 3P Service Provider (for example a telecommunications services provider) and not the Organisation. In such a scenario, do the obligations of Part IX of the Act continue to fall on both such 3P Service Provider as well as the Organization? Similarly, if in the contract between such 3P Service Provider and the Organisation, the obligation to conduct the checks with the DNC Registry is imposed on the 3P Service Provider, will such contractual provisions constitute the organisation as having taken reasonable steps and deemed not to have authorized the sending of the message under Section 37(4) of the Act?

4. Question 8

CSPL Comment:

We would like to propose that payment methods extend beyond credit card and IDD from a corporate account holder perspective.