WRITTEN VOLUNTARY UNDERTAKING ("Undertaking")
TO THE PERSONAL DATA PROTECTION COMMISSION

This Undertaking is given to the Personal Data Protection Commission or its delegates pursuant to section 48L(1) of the PDPA, by:

The National University of Singapore Society
UEN: S61SS0139H
Registered Address: Kent Ridge Guild House, 9 Kent Ridge Drive, #01-00 Singapore 119241

(hereinafter referred to as the "**Organisation**").

By signing this Undertaking, the above-named Organisation acknowledges the matters stated herein and undertakes to the Commission in the terms set out herein.

1. DEFINITIONS

1.1 In this Undertaking:

(a) "**PDPA**" means the Personal Data Protection Act 2012 (No. 26 of 2012); and

(b) "**Relevant Provisions**" means the provisions in Parts III, IV, V, VI, VIA and IX , and section 48B(1) of the PDPA.

2. ACKNOWLEDGEMENTS

2.1 The Organisation hereby acknowledges the following matters:

(a) The Commission has carried out investigations into certain acts and practices of the Organisation, and has reason to believe that the Organisation has not complied, is not complying, or is likely not to comply with one or more of the Relevant Provisions. The relevant facts and circumstances are summarised at Schedule A.

(b) As a result of any non-compliance with the PDPA by an organisation, the Commission has a number of enforcement options under the PDPA, including the option to issue directions under sections 48I or 48J of the PDPA.

(c) The Commission recognises that the Organisation has made efforts to address the concerns raised in this case and to improve its personal data protection practices. In addition, the Organisation was cooperative in the course of the investigation and was responsive to requests for

information. The Commission further recognises that the Organisation appears ready to implement or is in the midst of implementing the steps set out in Schedule B.

(d) Having carefully considered all the relevant facts and circumstances, the Commission takes the view that this is an appropriate case in which an Undertaking may be accepted.

2.2 The Organisation also acknowledges and agrees that the Commission may publish and make publicly available this Undertaking, and without limitation to the foregoing, the Commission may issue public statements referring to this Undertaking and/or its contents in whole or in part.

3. UNDERTAKINGS

3.1 The Organisation undertakes that it has taken, or will take all necessary steps, to carry out the actions or refrain from carrying out the actions referred to in Schedule B, and where applicable, in accordance with the stipulated timelines.

4. COMMENCEMENT

4.1 This Undertaking shall take effect upon the acceptance by the Commission of the Organisation's duly executed Undertaking.

5. THE COMMISSION'S STATUTORY POWERS

5.1 In order to provide the Organisation with an opportunity to complete all necessary steps to implement its undertakings set out in clause 3 above, the Commission will exercise its powers under section 50(3)(ca) of the PDPA to suspend the investigations referred to in clause 2 on the date the Undertaking takes effect as set out in clause 4.1.

5.2 The Organisation acknowledges that the Commission will verify the Organisation's compliance with its undertakings set out in clause 3 above, and if necessary, will exercise its powers under the Ninth Schedule of the PDPA to do so.

5.3 Clause 5.1 above shall be without prejudice to the Commission's statutory powers to conduct or resume, at any time, the investigations referred to in clause 2 above if it thinks fit, including but not limited to the situation where the Organisation fails to comply with this Undertaking or part thereof in relation to any matter.

5.4 Nothing in this Undertaking, including the Commission's acceptance of the Undertaking, is intended to, or shall, fetter or constrain the Commission's rights and statutory powers (including but not limited to those under sections 48I, 48J,

48L(4) and 50 of the PDPA) in any manner. Neither shall be construed as creating any anticipation or expectation that the Commission will take or not take any particular course of action in the future (whether in the present case or in respect of any other case concerning a breach or suspected breach of the PDPA). The acceptance of this Undertaking is strictly confined to the particular facts of the present case, and is made on the basis of the representations and information provided by the Organisation. The acceptance of an Undertaking in this case shall not be construed as establishing any precedent.

6. VARIATION

6.1 This Undertaking may be varied only with the express written agreement of the Commission.

This document has been electronically signed. The Parties hereby affirm that the electronic signatures have been affixed with the due authorisation of each Party and that Parties intend for the electronic signatures to carry the same weight, effect and meaning as hand-signed wet-ink signatures.

SIGNED, for and on behalf of)

The National University of Singapore Society)

By the following:)

Name: _____)

Designation: _____)

Date: _____)

ACCEPTED by)

)

Name: Yeong Zee Kin)

Designation: Deputy Commissioner / Commissioner

Personal Data Protection)

Date: _____)

SCHEDULE A

SUMMARY OF FACTS

1. On 8 October 2021, the Organisation was made aware by its IT Security Department that records of members of The National University of Singapore Society ("NUSS") were put on sale in an internet forum.

2. NUSS identified that a threat actor had conducted an SQL Injection attack on its website and was able to download all the data contained in 51 data tables. As a result of the attack, the personal data of the Organisation's approximately 3,725 individuals including their name, NRIC numbers, membership number, marital status, gender, date of birth, nationality, email address, telephone numbers, address, education details, motor vehicle registration details were affected.

SCHEDULE B

S/N	Item	Status	Target Date of Completion (Month-Year)
1	Ensure no personal data is stored at the webserver end	Completed	Oct 2021
2	Fix all vulnerabilities as identified in Group-IB's report	In Progress	Target to complete by 30 Nov 2021
3	Another penetration test after all vulnerabilities fixed	In Progress	Target to complete by Q1 2022
4	Ensure all 3rd party vendors have a. Compliance to the PDPA b. Proper data protection clauses in contract c. SOPs for handling NUSS personal data	In Progress	Target to complete by Q1 2022
5	Migrate web site from the current share hosting server to a Virtual Private Server (VPS), so that more security set up can be done to the server itself	In Progress	Target to complete by Q2 2022
6	Revamp the website to adhere to the Open Web Application Security Project (OWASP) guidelines.	In Progress	Target to complete by Q2 2022
7	Periodic Penetration Test	Periodic	Periodic