



Caption: PDPC Commissioner Mr Tan Kiat How (Extreme Right in black jacket) chatting with participants of the C-level Breakfast Talk.

## **Building a Data Protection Ecosystem to Boost Awareness, Capabilities and Accountability**

***The Personal Data Protection Commission (PDPC) has developed a data protection ecosystem roadmap with the aim of fostering an environment of trust and confidence among businesses and consumers, equipping Data Protection Officers (DPOs) in Singapore, and inculcating accountability in organisations.***

This was the focus of a C-level Breakfast Talk with PDPC Commissioner Mr Tan Kiat How on 4 May 2017, which was jointly organised by the Singapore Business Federation (SBF) and PDPC. The talk was one of a series of events organised during Privacy Awareness Week 2017, an annual initiative by the Asia-Pacific Privacy Authorities (APPA) to promote awareness of privacy and personal data protection issues.

Delivering her welcome remarks at the event, Ms Cheryl Kong, Assistant Executive Director, Member Relations, SBF, noted that data is a key resource in today's digital economy. As businesses now look for the best way to use data efficiently for competitive advantage, those that make full use of their data will be able to provide better services. Protecting data flows within the enterprise and with partners is therefore imperative, and the ability to leverage data safely and responsibly is of utmost importance to businesses, she said.





“That is why having personal data protection measures makes good business sense,” said Mr Tan.

In his keynote address, Mr Tan said that as data is such a valuable commodity today, if it is not handled with care, it may negatively impact businesses such as through the disruption of business operations, the loss of reputation, loss of customer trust, loss of business opportunities and the loss of time and money to deal with costly data breaches. He emphasised that Personal Data Protection is a good business strategy. Putting in place proper data protection policies and processes can help organisations gain customers’ trust and confidence, he said.

He also highlighted the need for organisations to take an end-to-end approach to data protection. Generally, organisations put in a lot of effort in data protection during the collection process with their emphasis on obtaining consent at this stage. But data collection is just the start of an entire life cycle involving the use of data, and organisations must also consider how they transfer data not only within their company and business units, but also across their ecosystem of partners and outsourcing providers. They must be certain that the people to whom they pass the data treat it as securely as they do.

“Through the entire data life cycle, we must have a process in place to safeguard and be responsible users of those data”, Mr Tan told the chief executive officers, chairpersons, managing directors and directors at the talk.

### Data Protection Ecosystem Roadmap

To help organisations do just that, the PDPC has laid the foundation for a data protection ecosystem roadmap. This includes putting in place a system of support around the organisation’s Data Protection Officer (DPO).

A DPO helps the organisation look out for “blind spots” relating to personal data protection. He or she can help ensure that there are safeguards in place for data protection and that any vulnerabilities or breaches can be discovered early. While it need not be a full-time role, the DPO should ideally be a senior member of the organisation, such as a vice-president, director or head of a business unit. This would encourage a culture of accountability across all levels of the organisation, said Mr Tan.

Mr Tan cited PDPC’s survey findings which found that 78 per cent of organisations in Singapore were aware of requirements relating to personal data protection. However, although 69 per cent had some level of compliance with the Personal Data Protection Act (PDPA), only 40 per cent had appointed a DPO, which is mandatory under the Act.

Notwithstanding the encouraging statistics on general awareness of the PDPA, more can be done to assist SMEs in their compliance journey. Government agencies can play a role in the ecosystem by supporting organisations and data protection professionals with resources and guidance. For instance, PDPC is working with Trade Associations and Chambers to encourage its industry members

to play a bigger part in shaping and strengthening Singapore’s personal data protection landscape. At the same time, PDPC is working with the IMDA SMEs Go Digital team to make available technical advisors to assist SMEs on more complex enquiries and guide them on resources that are available to them. The advisors will also assist with the matching of funding support, such as SPRING Singapore’s Capability Development Grant (CDG), to an SME’s needs, and help with the grant application.

PDPC is also working towards providing a listing of services providers who can offer technical services and IT solutions to SMEs, including outsourced services and solutions. Such a listing can help to match the supply of data protection services and solutions to that of the demand of organisations.

At the same time, PDPC plans to grow the population of DPOs in Singapore by professionalising the role of DPOs, through practical training and certificate recognition.

With international data flows being the norm of today’s Digital Economy, the data protection ecosystem can entrench Singapore’s position as a trusted hub for data innovation, said Mr Tan.

### Feedback from Participants

Many of the participants at the talk welcomed the initiatives under the data protection ecosystem roadmap.

Mr Chandran Nair, General Manager, Corporate, SingEx Holdings, said he had attended the talk to find out what should be the next step for organisations going forward.

“I was pleased to learn about the proposed ecosystem,” said Mr Nair, who is also the DPO of his organisation, which manages trade exhibitions, conferences and the operations of Singapore EXPO. “Rather than work in isolation, I would be interested to engage a group of like-minded industry professionals with whom I can work together and find solutions.”

He added that in the past, his organisation had sought clarifications on the PDPA from PDPC which had been very helpful. An ecosystem will certainly be of great help for this, he commented.

Furthermore, for an ecosystem to be effective, it should comprise DPOs who share common industry interest. “This will drive them to come together to share knowledge and find suitable solutions that are beneficial to all.”

Sharing her thoughts on creating an effective and trustworthy ecosystem, Mrs Eunice Toh, Executive Director of TTSH Community Fund which supports needy patients of the Tan Tock Seng Hospital, said that organisations “have a duty and also the responsibility” to ensure that PDPA best practices are



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**- Mr Chandran Nair,**  
General Manager, Corporate, SingEx Holdings, on the benefits of having a Data Protection Ecosystem



observed at every level, and to ensure that there is "clear understanding, compliance and accountability".

During the event's panel discussion, several members of the audience also raised interesting points and highlighted some of the challenges they have encountered with personal data protection. For example, one participant noted that while there are grants available to help organisations with good data management processes and systems to secure their data, such as the SPRING Singapore's CDG, the application process for such funding can be very tedious.

In response, Deputy Commissioner Mr Yeong Zee Kin said that PDPC would look into the feedback on the grant application process. Several organisations have benefitted from this grant and PDPC would continue to organise events to bring together service providers and prospective applicants.

Another question that was raised at the event was whether there will be any form of accreditation for companies which conform with the PDPA as this can help enterprises with business development.

The good news is that the PDPC is seriously considering this. "We want to recognise companies that are being very responsible in investing time, effort and resources to put in place systems for personal data protection, and to signal to the market which organisations these are," said Mr. Tan.

Championing the PDPA, Mrs Toh of TTSH Community Fund said the Act has helped to raise awareness of the importance of personal data protection. "Even now, I think the awareness level can be further improved," she said.



"Organisations have a duty and also the responsibility to ensure that PDPA best practices are observed at every level... making sure there is clear understanding, compliance and importantly accountability in order to have an effective and trustworthy data ecosystem."

**- Mrs Eunice Toh,**  
Executive Director, TTSH Community  
Fund, on the need to share good data  
protection practices



"Hearing directly from the Commissioner gives us a better sense of PDPC's thinking. We know that the authorities are here to help the community on issues relating to the PDPA."

**- Mr Chia Yoong Hui,**  
Chief Executive Officer of Ascenz  
Solutions, on the C-Level Breakfast Talk

Mr Chia Yoong Hui, Chief Executive Officer of Ascenz Solutions which provides operational risk intelligence solutions for the maritime industry, highlighted the need to train people. "Data protection must be instilled in the organisation's culture. Everybody must think about the confidentiality of data, including doing simple things like shredding documents, not exposing data on a desk and even escorting visitors to meeting rooms. It's the equal responsibility of everyone and the DPO is there to ensure we are doing okay."

Mr Chia gave positive feedback about the talk. Hearing directly from the Commissioner gave attendees a better sense of PDPC's thinking, he said. "We know that the authorities are here to help the community on issues relating to the PDPA".



### Objectives of the Data Protection Ecosystem

- Increase awareness of, and compliance with, the PDPA
- Increase the appointment of DPOs
- Provide more help to SMEs in their personal data protection journey
- Build industry capability and foster accountability