

PERSONAL DATA PROTECTION COMMISSION

Case No. DP-1912-B5465

In the matter of an investigation under section 50(1) of the
Personal Data Protection Act 2012

And

Horizon Fast Ferry Pte. Ltd.

SUMMARY OF THE DECISION

1. The Personal Data Protection Commission (“**Commission**”) investigated a complaint against Horizon Fast Ferry Pte. Ltd. (the “**Organisation**”) where the Organisation’s email account, singapore@horizonfastferry.com (the “**Email Account**”) had sent out phishing emails to its customers (the “**Incident**”).
2. Investigations revealed that the computer used to access the Email Account was infected with malware. This caused the Email Account to send phishing emails to three customers. Each email contained only the personal data that the customer himself had sent to the Email Account to book ferry tickets. Hence there was no disclosure of other customers’ personal data in the phishing email.
3. The Organisation informed the Commission that it had implemented various security measures prior to the Incident such as updating their anti-virus software regularly. However, investigations revealed that the password to access the Email Account was

shared by 11 employees of the Organisation and had not been changed for almost 3 years. This poor management of passwords fell short of what is reasonably required to protect the personal data in the Email Account.

4. The Deputy Commissioner for Personal Data Protection therefore found that the Organisation in breach of the Protection Obligation under section 24 of the Personal Data Protection Act 2012 for failing to implement reasonable security arrangements to protect the personal data in its possession or under its control. Upon consideration of the facts, a warning was issued to the Organisation.