

RESPONSE TO CONSULTATION PAPER

Consultation topic:	Public Consultation for Managing Unsolicited Commercial Messages and the Provision of Guidance to Support Innovation in the Digital Economy
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Question 2: What are your views on including commercial text messages sent using IM identifiers under the Spam Control Provisions?

We would like to clarify if the definition of 'sending in bulk' in the proposed New Act would be the same as the existing Section 6 of the Spam Control Act?

Question 3: What are your views on the proposed reduction of period for effecting withdrawal of consent to 10 business days, in line with the period to effect an unsubscribe request under the Spam Control Provisions?

Whilst the proposal looked at streamlining the number of days, this may disrupt an organisation's operations as it is a significant reduction of number of days. Should this be implemented, firms may have to put in additional resources to deal with all requests within the prescribed period.

Question 7: What are your views on the proposed obligation to communicate accurate DNCR results, and liability on third-party checkers for any infringements of the DNC Provisions resulting from inaccurate information they provided?

We are supportive of this proposal.

Question 10: What are your views on the proposed Enhanced Practical Guidance framework?

In relation to the proposal on regulatory relief and information provided during EPF determination process, we would like to clarify if the EPG process is overseen by a function which is independent from the supervisory and enforcement function? If not, the well intent of having an EPG framework will be defeated as organisations may be deterred from approaching PDPC out of 'fear' of being reprimanded.