

VOLUNTARY UNDERTAKING UNDER
SECTION 48L OF THE PERSONAL DATA PROTECTION ACT 2012

Case number: DP-2210-C0365

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

And

(1) Yayasan Mendaki (UEN No. 198902633C)

... Organisation

The Commission has reasonable grounds to believe that the Organisation has not complied, is not complying or is likely not to comply with section 24 of the Act. In order for the Commission to suspend its investigation pursuant to section 50(3)(ca) of the Act, the Organisation HEREBY UNDERTAKES that it will:

- (a) Complete the remediation plan set out at Schedule B within the timelines stated in Schedule B; and
- (b) Within 14 days of the completion of the remediation plan set out at Schedule B, provide the Commission with a copy of the declaration set out at Schedule C duly signed by the signatory of this Undertaking or a representative of the Organisation of equal designation.

The Organisation acknowledges that the Commission shall be entitled to publish and make available to the public this Undertaking and the summary of the Commission’s findings set out at Schedule A to this Undertaking.

The terms of this Undertaking may be varied by the written agreement of the Commission and the Organisation.

SIGNED, for and on behalf of)

Yayasan Mendaki)

By the following:)

Name: _____)

Designation: _____)

Date: _____)

SCHEDULE A

SUMMARY OF FACTS

1. On 27 October 2022, the PDPC was informed that the Organisation's servers were encrypted by a ransomware attack. Preliminary investigation had revealed that only the on-premises network was affected while the cloud infrastructure was not affected.
2. After conducting forensic investigation, the Organisation discovered that approximately 2.7TB of data had been exfiltrated from a virtual file server. However, the contents of the exfiltrated data could not be determined and none of the exfiltrated data has been published, leaked or put up for sale on the Dark Web.
3. To prevent a recurrence of a similar incident, the Organisation took immediate remedial actions to address the cause of the personal data breach and notified the potential affected individuals.

SCHEDULE B

REMIEDIATION PLAN BY YAYASAN MENDAKI (“YM”)

No.	Remediation action	Status	Target Completion
1	Implement phishing awareness training for all newly onboarded YM staff members as part of YM’s staff onboarding and orientation process.	On going	By 31 December 2023
2	Reviewing and confirming software patches are up to date.	On going	By 31 December 2023
3	Reviewing and updating YM’s firewall policy	On going	By 31 December 2023
4	Running software scans on all staff-issued laptops.	On going	By 31 December 2023
5	Consulting with cybersecurity experts to: (a) Assist with YM’s migration from on-premise servers to cloud servers; (b) Implement and improve cybersecurity on YM’s cloud services and server environment.	On going	By 31 December 2023
6	Implemented a data export limit/restriction to detect and alert YM if large amounts of data are exported from its servers	On going	By 31 December 2023
7	Restricted access to YM’s servers based on the location of origin of the relevant IP address	On going	By 31 December 2023
8	Implementing Cisco Cloud Email Security as an added layer of YM staff email security	On going	By 31 December 2023
9	Implemented two-factor authentication (with a fresh prompt every 24 hours) on access to YM’s servers and services.	On going	By 31 December 2023
10	Implemented time-specific access restrictions to YM’s cloud servers and services	On going	By 31 December 2023

11	Implemented third party cloud backup for YM's user accounts and email	On going	By 31 December 2023
12	Disabled permissions for: (a) Connecting unauthorised personal devices to YM's servers; and (b) Connecting removable storage devices (via USB ports) to staff-issued laptops	On going	By 31 December 2023
13	Reviewing the use of wireless devices with staff-issued laptops.	On going	By 31 December 2023
14	Restricted file sharing between staff members only via YM's internal Sharepoint platform, and disabling file sharing using other methods/platform	On going	By 31 December 2023
15	To implement virtual private network (VPN) to separate cloud environment from the Internet	Not started	By 31 December 2023
16	To update password policy to adopt stronger passwords of at least 12 alphanumeric characters to be in line with CyberSecurity Agency of Singapore's guidelines	Not started	By 31 December 2023

SCHEDULE C

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(1) Yayasan Mendaki (UEN No. 198902633C)

... Organisation

DECLARATION

I refer to the voluntary undertaking dated _____ given by the Organisation to the Personal Data Protection Commission pursuant to section 48L of the Act (“**the Undertaking**”).

I declare that the remediation plan set out at Schedule B of the Undertaking has been completed.

I acknowledge that by making a false declaration or providing false or misleading information to the Personal Data Protection Commission, I may be prosecuted for offences under section 51(3)(c) of the Personal Data Protection Act 2012 and/or section 182 of the Penal Code 1871.

Signature

Date

Name

Designation