

# REPORT ONSITE AUDIT OF 50 COMPANIES IN SINGAPORE

*Aug 2013 - Sep 2014*



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## Introduction

Singapore Personal Data Protection Act was legislated in 2012 to protect the individual's personal data. It recognises both the rights of individuals, including rights of access and correction, and the needs of organisations to collect, use or disclose personal data for legitimate and reasonable purposes. It also provides for the establishment of a national Do Not Call (DNC) Registry.

## Objectives of report

- To Identify the most common potential data breaches in organisations in Singapore and Malaysia that could contravene the Personal Data Protection Act
- Discover to what extent breaches are related to paper documents (conducted between Aug 2013 – Sep 2014)

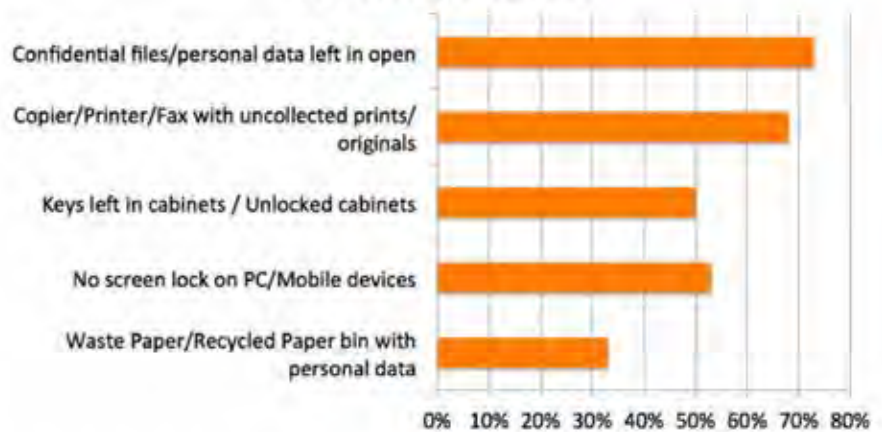
## Methodology

- Identified 14 common areas of potential data breaches
- Worked with data protection officers from the organization (clients) and from DPEX Centre Data Protection Hands-on Course to document common data breaches. Number of Companies involved: n = 50
- Top 5 data breaches were documented.
- Period conducted between Aug 2013 – Sep 2014)

## Findings

1. The areas of risk where organisations can potentially contravene the Personal Data Protection Act (PDPA). Based on more than 50 on-site PDPA audits which the company managed with the help of data protection officers from SMEs, the biggest risks identified were those related to paper documents. The top five areas identified (outside the IT infrastructure) are as follows:

**PDPA Exposures within Organisation**  
**% of Respondents**



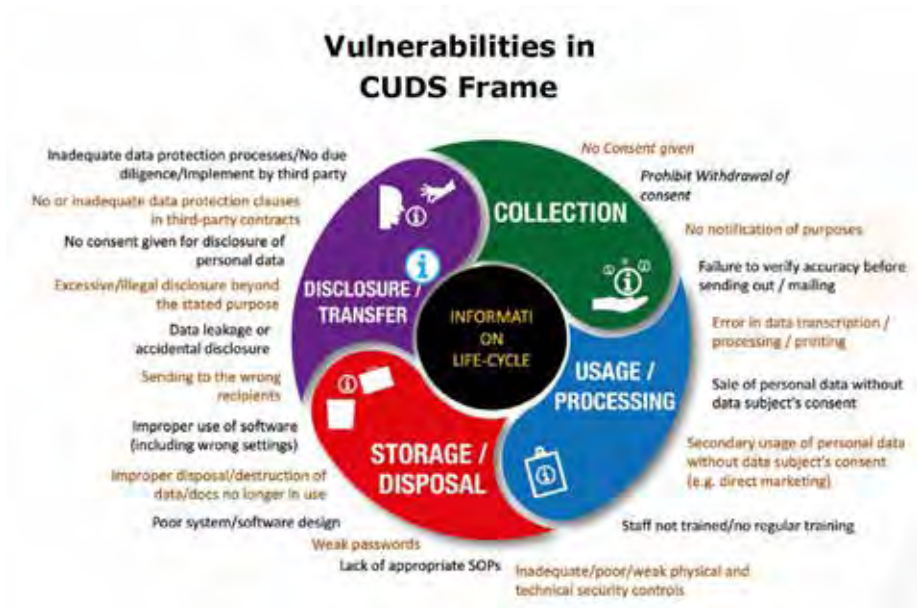
Source: Straits Interactive Findings from 50 PDPA Audits  
 Participants may choose more than one answer.

- a) 73% of companies audited had exposed desks with confidential / personal data
- b) 68% of them had uncollected prints and / or originals left at the copier
- c) 1 in 2 companies had risks associated with
  - Unlocked or exposed screens on PC / mobile devices
  - Unlocked cabinets or those with keys left in the keyhole
- d) 1 in 3 companies had papers and / or documents with confidential data thrown into waste paper or recycled bins documents.

## Conclusion

These findings, collected over a span of a year, included clients from Straits Interactive undergoing PDPA site audits and those who attended the company's popular hands-on data protection officer's course. The gaps were easily addressed with recommended information security measures. The audit methodology included a data inventory assessment and an analysis of the flow of personal data within the organisation. This was followed by an actual site inspection of where personal data was collected, processed and stored.

Following the audit and integrating with learnings from IAPP, the common vulnerabilities the various points of collection, processing (usage), storage and disclosure of personal data can be seen in the following framework:





## About Straits Interactive

Straits Interactive delivers end-to-end governance, risk and compliance solutions that enable trusted business and responsible marketing, especially in the area of data privacy and protection. Recently Data Protection Trustmark (DPTM) certified, we help businesses achieve operational compliance and manage risks through a combination of cloud technology and professional services. Our quest for innovation has led to us being recognised and awarded Intercon's Top 50 Tech Companies (in recognition of the company's contribution to technology) and APAC Business Headlines' Company of the Year, 2019. Our software-as-a-service solutions include DPOinBOX and Governance, Risk & Compliance System (GRACIAS), all of which are supported by professional services that include advisory services, audits, and training. More information about the company can be found on [www.straitsinteractive.com](http://www.straitsinteractive.com).



## About the Data Protection Excellence (DPEX) Network

The Data Protection Excellence (DPEX) Network is the first of its kind facility in the ASEAN region whose aim is to provide leadership, best practices, training, research and support for all things surround data privacy from an operational perspective. This collaboration of partnerships comprise accreditation bodies, law firms, universities and organisations who provide professional services and technologies relating to data privacy. An ever-growing network, members currently include Straits Interactive, Singapore Management University, International Islamic University of Malaysia, De LaSalle University, Philippines, IAPP, EXIN, OCEG and Lexxion amongst others. More information about DPEX Network can be found at [www.dpexnetwork.org](http://www.dpexnetwork.org)

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