



JLPW INSIGHTS

B-11-8 Level 11 Magazi Axenye II Haldan Apekwen Seng 50A50 Kalcikwamszeria MOMENTAL LIMBUR

# Legal Updates on Personal Data Protection

Summary of the Guideline on Data Breach Notification

#### Introduction

"data subject"

"sensitive personal data"

Office Hours 8.30 am - 5.30 pm 8.30 am – 5.30 pm Mondays to Fridays Mondays to Fridays

Chan Yee Choi Jesy P.G. Ooi

The long-anticipated amendments to the Personal Data Protection Act 2010 ("PDPA 2010") that is gazetted in October last year, introduced a requirement for data controllers to notify the Personal Data Protection Commissioner ("Commissioner") and affected data subjects if a data breach occurs (amongst other amendation of the commissioner). These amendments came into force on 1 January 2025. Kramny H. K. Paran

Yours faithfully, James C. C. Wong

for Jeff Leong, Poon & Wong Following the gazettement, the Department of Personal Data Protection ("JPDP") had in November 3024 announced that the Commissioner would release guidelines and a standard by early 2025 on compliance with the mount in the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would release guidelines and a standard by early 2025 on compliance with the commissioner would be a standard by early 2025 on compliance with the commissioner Lee Seen Yin introduced by the amendments. Nancy, S.F. Kueh

[name of Partner/Lawyer]

E-mail: [email address of Partner/Lawyer]
The Commissioner has now on 25 February 2025 issued a circular ("Circular No. 2/2025") as well-sale guideline on data breach notifications ("DBN Guideline"), and we hope to provide a meaningful and concise summary perow.

Jesy P.G. Ooi John Stanley Isaacs John Stanley Isaacs **Defined Terms** KhrawW.S.Heheong **Richard Maw**Cheong **RighardHawin** 

Throughout this summary, we will be using certain defined terms from the PDPA 2010 which are will be low for your ease of reference. RaheenegP\$thithUMen

> Whenday Workin Limen Wov-PuKukim II

"data controller" : means anyone other than a data processor, who processes personal data, or

> controls or authorises the processing of personal data. Loo Lee Lin T. Fe Emily J. S. Chin

"data processor" : means anyone who processes personal data only on behalf of and the controller and

does not process the personal data for their own purposes. An entitle of a data

controller is not considered a data processor. Meera Michele Nainar Michelle M.X. Yap

TABREACE P.J. Liw Mighzelle Mer. Yap : means the individual who is the subject of the personal data; FSW SUZ Brind iw Jilliffanly. \$9h Teh

SDawhisez Printee "personal data" : means any data from which a person can be identified; Dan the i P. Xuanee

: means personal data containing information on a data subject's plays it is the means personal data containing information on a data subject's plays it is the means personal data containing information on a data subject's plays it is the means personal data containing information on a data subject's plays it is the means personal data containing information on a data subject is the means personal data containing information on a data subject is the means personal data containing information on a data subject is the means personal data containing information on a data subject is the means personal data containing information on a data subject is the means personal data containing information on a data subject is the means of the means o

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commission of offences and biometric data.

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Amos M. W. Kok



#### <del>JEFF</del> <del>LEONG,</del> <del>P O O N &</del> <del>W O N G</del>

#### **Definition of Personal Data Breach**

ADVOCATES & SOLICITORS

Under section 2 of the PDPA 2010, a personal data breach is defined as any breach, loss, misuse or unauthorized access of personal data. The DBN Guideline expands this definition to include any event or incident that is likely to lead your Ref : Please advise to such breach.

[date]

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# Requirement to Notify the Commissioner [insert content]

In accordance with section 12B(1) of the PDPA 2010, if a data controller has reason to believe that a personal data breach has occurred, the data controller must notify the Commissioner as soon as practicable. The DBN Guideline clarifies that not all personal data breaches are required to be notified to the Commissioner, but the Sonal data breaches that cause or are likely to cause significant harm.

A personal data breach causes or is likely to cause significant harm if there is a risk of any of the following: Lim

the personal data breach may result in physical harm, financial loss, a negative effect of the cords or damage to or loss of property; Kramny H. K. Paran

Youtsefaithfiphymised personal data may be misused for illegal purposes;

for left Leong Roon & Wong data consists of sensitive personal data;

ulilleen S. K. Tida the compromised personal data consists of personal data and other personal information, which, when Lee Seen Vin combined, could potentially enable identity fraud; or

[narme of Partnardata bee ach affects more than 1,000 data subjects, i.e. it is of significant scale affects more than 1,000 data subjects, i.e. it is of significant scale. E-mail: [email address of Partner/Lawyer]

Where a personal data breach involves more than 1 data controller, each data controller must subject an action to Chan Yee Chong Jesy P.G. Ooi the Commissioner.

It is important to note that the mandatory personal data breach notification obligations do not apply to data processors. Data controllers must contractually impose obligations on data processors engaged by them (if a replacement of the controllers must contract the controllers must controller the controllers must controller the controllers must controller the controllers must controller the controller than the controller th data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches that occur and to provide all reasonable and necessary assistance to meet data breaches the breaches that occur are the provide all reasonable and necessary assistance to meet data breaches the breaches that the breaches the breachest t obligations. RaheenegP\$thithUMen

## Timing of the Notification to the Commissioner

Notification is required to be made as soon as practicable within 72 hours from the occurrence of the source of th Cheng Mun Mun Emily J. S. Chin Yeo Shu Pin Cheng Mun Mun Meera Michele Nainar breach.

On this point, it is worth noting that based on the examples provided in the DBN Guideline, the computation of the 72 hours is from the time that the data controller is made aware of a personal data breach, or from the time that the data Michelle Max. Yap controller confirms that a personal data breach has occurred, as applicable. FSW SUZ Brind iw

#### Format of the Notification to the Commissioner

Notification to the Commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commissioner may be made through completing the notification form available on the commission of the c of JPDP or by completing the notification form in Annex B of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the DBN Guideline and submitting it the base of the b Cherry S.Y. Cheah hand.

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#### JEFF LEONG. POON & WONG

Along with the notification form, the data controller is also required to provide the below listed information to the Commissioner. If this is not possible at the time of the initial notification, the information may be provided in phases, as soon as practicable within 30 days from the date of the initial notification. **Contact Details** 

Your Ref : Please advise The requested information is as follows:

[date tails of the personal data breach, including:

the date and time the personal data breach was detected by the data controller; [insert content] on the type of personal data involved and the nature of the breach;

the method used to identify the breach and the suspected cause of the incident; 0

the number of affected data subjects; 0

the estimated number of affected data records; and 0

the personal data system affected, which resulted in the breach;

the potential consequences arising from the personal data breach;

the chronology of events leading to the loss of control over personal data:

measures taken or proposed to be taken by the data controller to address the personal data breach, including **Partners** 

steps implemented or planned to mitigate the possible adverse effects of the breach; measures taken or proposed to be taken to address the affected data subjects; and

Youtsefaithfuldy, details of the data protection officer or any other relevant contact person⊯frema whom further Wong Kath Huii

for left Leang, Poon be 8800 data breach may be obtained.

Anne W. Y. Weng If the data controller fails to notify the Commissioner within the 72-hour timeframe, written notice ntestable submitted to the **്യൂൺങ് നിങ്**നയ്ക്**. alwye** the reasons for delay and providing supporting evidence, including documentation of the incident time internal factors that contributed the delay.

### **Requirement to Notify Data Subjects**

Khra Wir. S. Heineong In accordance with section 12B(2) of the PDPA 2010, data controllers are additionally required underside tion 12B(2) of the PDPA 2010 to notify affected data subjects without unnecessary delay if the personal data breach calcuses or is likely witness p.E. Immo to cause any significant harm. RaheenegP\$thithUMen

The DBN Guideline clarifies that the criteria for assessing significant harm for notification to the Commissioner also applies for the notification to affected data subjects, save for the significant scale criterion.

#### Timing of the Notification to Data Subjects

Notification is required to be made without unnecessary delay within 7 days from the date of the initial notification to the Commissioner. Ten Pore Pul. Liw

#### Format of the Notification to Data Subjects

The notification to affected data subjects shall be provided directly and individually in a practical manifest using clear and appropriate language, to allow data subjects to take necessary precautions to protect themselves. Such motification should be separate from other communication, such as regular updates or newsletters, so that the ผัสเกิดแก่เราเรา Cherry S.Y. Cheah clear and transparent. Lee Seng Yau Cherry S.Y. Cheah Yuki M.Y. Chong Lee Seng Yau

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#### JEFF LEONG, POON & WONG

If direct notification is not practical, the data controller may use alternative means of notification, such as public announcement or other similar methods.

The notification must include the following information: Your Ref: Please advise

the details of the personal data breach that has occurred:

[date tails on the potential consequences resulting from the personal data breach;

measures taken or proposed to be taken by the data controller to address the personal data breach, including, where appropriate, measures to mitigate its possible adverse effects;

measures that the affected data subjects may take to eliminate or mitigate any potential adverse effects resulting from the data breach; and

the contact details of the data protection officer or other contact point from whom more in the data protection officer or other contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from whom more in the data protection of the contact point from the data protection of the contact point from the data protection of the data protection the personal data breach can be obtained.

**Contact Details** 

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Michael H. K. Lim

#### **Assessment Requirements**

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KhrawW.S.Heheong

Cheong Cheong RinghardsHawim Wiemeie P.E. Lition

Reneger Sthith Unlen

Whendow Wish Limen Wayn Polk Whim Lim

Carissa MnT. Ee

Loo Lee Lin T. Fe Emily J. S. Chin

Data controllers should act promptly upon becoming aware of any personal data breach to assess controllers and reduce its potential aithoraudy. James C. C. Wong

for Jeff Leong, Poon & Wong

Data controllers may consider the following immediate containment actions, as applicable:

ulilleen S. K. Tida Anne W. Y. Wang Lee Seen Vin Nancy, S.F. Kuch

- [nanselate and อเรื่องพทอปี the compromised database or system from the network;
- E-mail: Jemail address of Partner Lawyerless rights;
- stop the practices identified as having caused the data breach; and

determine whether the lost data can be recovered or whether any immediate remedial action to Jesy P.G. Ooi John Stanley Isaacs minimise further harm caused by the breach. John Stanley Isaacs

During the investigation, data controllers should also identify the following:

- the type(s) of personal data involved;
- the number of affected data subjects;
- the systems, servers, databases, platforms and services affected;
- the chronology of events leading to the data breach;
- the severity of the data breach;
- the root cause of the data breach, and whether it is still ongoing;
- the harm and potential harm that may result from the data breach;
- the measures that should be taken to contain the data breach, and mitigate its possible adverse in the
- the remedial actions that should be taken to reduce the harm to affected data subjects.

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Cheng Mun Mun Emily J. S. Chin Yeo Shu Pin Cheng Mun Mun Meera Michele Nainar

The data controller should conduct a post-breach evaluation to review the effectiveness of methods data breach management and response plan, as well as their data protection practices and policies to prevent the recurrence of Dan the i P. Xuanee similar incidents.

Amos M. Wx.Kek Caroline S.R. Lim Low Yaw Ren Lim Cherry S.Y. Cheah Lee Seng Yau
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#### **Governance Requirements**

ADVOCATES & SOLICITORS

In addition to notification procedures, the DBN Guideline requires a data breach management and response plan to be put in place by data controllers, with a focus on prompt identification of personal data breaches and appropriate Your Ref : Please advise contain and mitigate any breaches as well as ensure compliance with data breach notification of bligations.

A datate ach management and response plan should outline the following:

[insert content] personal data breach identification and escalation procedures;

roles and responsibilities of relevant stakeholders (e.g., the data breach

response plan, the data protection officer);

steps to contain and mitigate the impact of the breach;

steps to determine whether it is necessary to notify the Commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine whether it is necessary to notify the Commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine whether it is necessary to notify the Commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine whether it is necessary to notify the Commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine whether it is necessary to notify the Commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine whether it is necessary to notify the Commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine whether it is necessary to notify the Commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine the commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine the commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine the commissioner and/or the affected (\$30.9m - 5.30.pm) steps to determine the commissioner and/or the commissioner and/or the commissioner and the

communication plan for notifying the Commissioner and/or the affected data subjects; and

Data controllers should also conduct periodic training as well as awareness and simulation exercises, to ensure that employees are aware of their roles and responsibilities in responding to a personal data breach.

Yours faithfully,

for Jeff Leong, Poon & Wong

post-incident review.

#### **Record Keeping Requirements**

Data name of the street keep of cords and maintain a register detailing personal data breaches for at least 2 vears from the date of the mail address of he commissioner. Such records and register should also detail any personal data breaches that were not required to be notified to the Commissioner, but the timeframe for retention is motivated. The documentation must be made available on request by the Commissioner. Chan Yee Chong Jesy P.G. Ooi

The register should document the following information:

- description of the personal data breach, including the date and time the data controller became a second warre of the personal data breach, an analysis and identification of the root cause, the type of personal data involved, the estimated number of affected data subjects, the estimated number of affected data subjects, the WaynPolk Willim Lim compromised personal data system
- which allowed the breach to occur;
- description of the likely consequences of the personal data breach;
- description of a chronology of the events leading to personal data breach;
- containment and recovery measures taken to address the personal databreach; and
- details of notifications made to the Commissioner and/or affected data subjects and justification for making notifications, where applicable.

Concerns

During our perusal of the DBN Guideline, we noticed that there is a discrepancy with the PDPA 2010 con what constitutes a personal data breach. Under section 2 of the PDPA 2010, a personal data breach is defined as any foreach, loss, misuse or unauthorized access of personal data. However, under the DBN Guideline, a personal data preach also includes any event or incident that is likely to lead to such breach, loss, misuse or unauthorised acressing conditions.

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Yeo Shu Pin Cheng Mun Mun Meera Michele Nainar

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Wona Kalh Hiji

2025) may lead to

#### JEFF LEONG. POON & WONG

There is also a discrepancy on when notifications are required to be made to the Commissioner. In accordance with section 12B(1) of the PDPA 2010, if a data controller has reason to believe that a personal data breach has occurred, the data controller must notify the Commissioner as soon as practicable. Data controllers are additionally required under section 12B(2) of the PDPA 2010 to notify affected data subjects without unnecessary delay if the personal data breach courses advise causes of personal fixed breach causes of personal fixed breach causes of personal fixed breach cause any significant harm.

The limerence between sections 12B(1) and (2) of the PDPA 2010 (that is where subsection 12B(1) requires notification to the Commissioner of personal data breaches but subsection 12B(2) requires notification to the data subject only [insert content] where the personal data breach causes or is likely to cause significant harm) implies that there is a difference between the breaches where notification is required to the Commissioner than those where notification is required to the data subject. Office Hours

However, the DBN Guideline provides that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for per son that notification to the Commissioner is only required for the C that cause or are likely to cause significant harm. The DBN Guideline further states that the criteria to assess significant harm are the same for both notification to the Commissioner and notifications to data subjects (exception the commissioner and notifications to data subjects (exception the commissioner and notifications to data subjects). scale criterion).

These discrepancies between the PDPA 2010 and the DBN Guideline (as well as Circular No. confปัญษารสุดเป็นโปนให่ of clarity

for Jeff Leong, Poon & Wong

Jill<del>os</del>n S. K.Ticia To illustrate, an example given by the DBN Guideline of a personal data breach is the accidental personal data containing personal data to the wrong recipient. As the definition of a personal data breach under the BBM Guideline is very [Nature of Clading / equiver] or incidents likely to lead to a breach), and the requirement for notification to the Commissioner under the PDFR 2018 flags where wide (being of all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commission is all personal data breaches whether which all some commissions are commission of the or otherwise). Data controllers may then be required to notify the Commissioner every time in the controllers may then be required to notify the Commissioner every time in the controllers and in the controllers may then be required to notify the Commissioner every time in the controllers are controllers. Chan Yee Chong Jesy P.G. Ooi addresses.

We urge the JPDP to clarify these discrepancies.

The full Circular 2/2025 and the DBN Guideline are available on the official website of JPDP here. Raheeed ShirtuWen

Wendw Wshin Limen

Prepared by Alicia Teon (Partner)

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