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Introduction

1. The Personal Data Protection Act 2012 (the “**PDPA**”) is intended to be a baseline law for the protection of personal data in Singapore. The Personal Data Protection Commission (“**PDPC**”)¹ was established on 2 January 2013 to administer and enforce the PDPA. The PDPA is applicable to Professional Investment Advisory Services Pte Ltd (the “**Organisation**”) and the Organisation must comply with it.
2. A Do Not Call (“**DNC**”) regime/framework will be established to enable individuals to register their Singapore telephone number(s) with the DNC registry if they do not wish to receive marketing messages through their Singapore telephone number. The DNC registry will be / is operated by the PDPC. This will have an immediate impact on all of the Organisation’s telemarketing activities. The DNC regime/framework comes / has come into force on 2 January 2014.
3. From 2 January 2014 and thereafter, all employees and advisers of the Organisation must strictly comply with this policy. For employees of the Organisation, this policy binds each employee and each employee is contractually required to comply with it. This policy forms a part of the terms of the employment contract between the Organisation and the employee. **FAILURE BY THE EMPLOYEE TO COMPLY WITH THIS POLICY OR A BREACH BY THE EMPLOYEE OF THE TERMS OF THIS POLICY WILL SUBJECT THE EMPLOYEE TO DISCIPLINARY PROCEEDINGS INCLUDING POSSIBLE TERMINATION AT THE DISCRETION OF THE ORGANISATION.**
4. A breach of the DNC regime/framework carries with it criminal liability under the PDPA. All employees and advisers are therefore expected to be fully aware of the dos and don’ts relating to telemarketing, the sending of marketing SMSes/MMses, marketing faxes and the making of marketing voice calls.
5. Further, should the Organisation be fined for breaches of the DNC regime/framework as a result of an action or omission of any employee, the Organisation reserves its right to claim compensation and damages from that employee.

Messages impacted by the DNC Regime/Framework

6. The DNC regime/framework applies to all manifestations or forms of messages, whether in sound, text, visual or other form. It would therefore include messages such as Short Messaging Service (“**SMSes**”) messages and Multimedia Messaging Service (“**MMses**”) messages, voice calls and any data applications which use a Singapore telephone number². A voice call includes a call that involves a recorded or synthetic voice.
7. The DNC regime will impose restrictions on :
 - (a) marketing telephone or voice calls;
 - (b) marketing text messages (SMSes and MMses); and/or
 - (c) fax messages,

that are sent to a Singapore telephone number. It can be a Singapore landline, a Singapore mobile phone number, or a Singapore fax number, whether residential or business lines. The DNC regime/framework will

¹ The PDPC is a statutory body.

² For example, Whatsapp, iMessage, Viber etc.

however not apply to telephone numbers of other countries such as a Thailand telephone number or an Indonesian telephone number.

8. Under the DNC regime/framework, a Do Not Call registry ("**DNC Registry**"), comprising of 3 registers, will be maintained by the PDPC, as follows :
 - (a) one for marketing telephone or voice calls;
 - (b) another for marketing text messages (SMSes and MMSes); and
 - (c) a third for fax messages,
 (the "**DNC Registers**").
9. A user or subscriber of a Singapore telephone number who does not wish to receive any marketing messages via the above three modes of communication to his Singapore telephone number, may choose to register his Singapore telephone number on any or all of the 3 abovementioned registers.
10. Pursuant to the DNC regime/framework, certain kinds of messages will be subject to certain conditions, a breach of which will be criminal. These messages would essentially be messages of a marketing nature ("**Marketing Messages**")³. A "**Marketing Message**" is very broadly defined in the PDPA. It is a message where the purpose of the message, or one of the purposes of the message, is :
 - (a) to offer to supply goods or services;
 - (b) to advertise or promote goods or services;
 - (c) to advertise or promote a supplier, or prospective supplier, of goods or services;
 - (d) to offer to supply land or an interest in land;
 - (e) to advertise or promote land or an interest in land;
 - (f) to advertise or promote a supplier, or prospective supplier, of land or an interest in land;
 - (g) to offer to provide a business opportunity or an investment opportunity;
 - (h) to advertise or promote a business opportunity or an investment opportunity; or
 - (i) to advertise or promote a provider, or a prospective provider, of a business opportunity or an investment opportunity.

Although already defined very widely, it is possible for the authorities to subsequently include further instances when a message would be deemed a Marketing Message.

11. In considering whether the purpose or one of the purposes of a voice call, an SMS/MMS or a fax (the "**Message**") falls within that which would make it a Marketing Message, the following will be considered, namely the content and presentation of the Message as well as the content that may be obtained through the message (i.e. by using the numbers, URLs or contact information included in the message) and/or the content that can be obtained by calling the number from which the Message was made.

³ In the PDPA, such messages are defined as "specified message" but for ease of understanding, we have referred to them as Marketing Message instead.

12. Note also that a Message sent to a Singapore telephone number where the purpose, or one of the purposes, is to seek clear and unambiguous consent to send Marketing Messages to that Singapore telephone number, would itself be considered a Marketing Message. The effect is that the sending of such messages must also comply with the requirements of the DNC regime/framework. Employees or advisers must not seek to obtain clear and unambiguous consent from an individual, using fax/text message/voice call to his Singapore telephone number to seek his consent.

The Prohibitions

13. 3 key requirements or prohibitions apply to all Marketing Messages. For ease of reference, we shall refer to them as :
- (a) The **“Requirement to Check with the DNC Registry”**, which is explained at paragraphs **14 to 16** below;
 - (b) The **“Requirement to provide Contact Information”**, which is explained at paragraphs **27 to 31** below; and
 - (c) The **“Voice Call Calling Line Identity Prohibition”**, which is explained at paragraphs **33 to 35** below.

Requirement to Check with the DNC Registry

14. The Requirement to Check with the DNC Registry is as follows :
- (a) Before any organisation or any person sends a Marketing Message to a Singapore telephone number, that organisation or person must strictly comply with the following :
 - (i) within a certain number of days prior to sending the Marketing Message have checked with the DNC Registry under the PDPC on whether that Singapore telephone number has been registered with the relevant DNC Register (depending on whether a fax, SMS or voice call is intended to be sent/made); and
 - (ii) only if there is confirmation from the DNC Registry that Singapore telephone number is not registered with the relevant DNC Register, can that organisation or person then send the Marketing Message to that Singapore telephone number via the mode of communication for which the Singapore telephone number has not been registered.
15. If that Singapore telephone number is found to be registered, that organisation or person must not send the Marketing Message to that Singapore telephone number. To do so would be a criminal offence. Further details of the checking that is to be done with the DNC Registry are set out at paragraph **56 to 58** below.
16. There is however an exception to the above requirement to check a Singapore telephone number with the DNC Registry. This is where the subscriber or user of that Singapore telephone number has, prior to your sending of the Marketing Message, given clear and unambiguous consent to receiving such Marketing Messages at his Singapore telephone number via the particular mode of communication namely fax, SMS/MMS and/or voice call. Such consent must be in writing, further details on obtaining clear and unambiguous consent are set out at paragraphs **44 and 46** below.

17. As a matter of best practice, consent should be obtained in writing. Refer to the consent forms enclosed at **Annex 2: Personal Data Notice & Consent Form**, **Annex 4: Personal Data Update Form** and **Annex 6: Email version of Personal Data Notice & Consent Form** which you can use to obtain clear and unambiguous consent. Further details on obtaining clear and unambiguous consent are set out at paragraphs 44 to 46 below.

Exemption for Certain Specified Messages

18. The Organisation and its advisers are exempt from the Requirement to Check with the DNC Registry prior to sending a Marketing Message to a Singapore telephone number if all of the following requirements are fulfilled⁴:
- (a) the Marketing Message is either a fax message or a text message (SMS/MMS). It cannot be a voice call;
 - (b) the sender is in an ongoing relationship with the subscriber or user of the Singapore telephone number at the time of the transmission of the Marketing Message to that Singapore telephone number; and
 - (c) the purpose of the Marketing Message is related to the subject of the ongoing relationship.

A Marketing Message to be sent to an individual that satisfies all of the above will be referred to in this document as an “**Exempt Message**”. Each of the above conditions will be elaborated upon in the following sections. Note that an Exempt Message is limited only to either a fax message or a text message. Telephone/voice calls are outside of this exemption. For telephone/voice calls, the requirement to check with the DNC Registry elaborated at paragraphs **14 to 16** above will continue to apply.

19. If you are not sure whether the above requirements have been met for a particular Marketing Message that you intend to send, it is always advisable to err on the side of cautious and check with the DNC Registry elaborated at paragraphs **14 to 16** above.

Conditions for Sending an Exempt Message

20. An Exempt Message must in addition comply with the following conditions :
- (a) it must contain a clearly displayed statement in the English language which informs the user/subscriber of the Singapore telephone number that he may opt out from receiving via his Singapore telephone number any Exempt Message by providing the Organisation with an opt-out notice, and :
 - (i) where the Exempt Message is a fax message, by way of fax message to a fax number stated in the Exempt Message (for the avoidance of doubt, the Exempt Message must contain such latter information); and

⁴ Personal Data Protection (Exemption from section 43) Order 2013 comes into force on 2 January 2014.

- (ii) where the Exempt Message is a text message, by way of text message to a Singapore telephone number or a short number code facility stated in the Exempt Message (for the avoidance of doubt, the Exempt Message must contain such latter information);

Sample Opt-Out Notice Wording for SMS/MMS/text messages:

“To opt-out from receiving such marketing text messages in future, send text “OPTOUT” to [insert number]”

Please note that the above is merely a sample of the opt-out notice to be inserted in the Exempt Message. The sample does not address the Requirement to provide Contact Information as explained at paragraphs **27 to 31**, which is also one of the requirements.

- (b) the numbers provided in the opt-out notice (i.e. the telephone number, short number code facility, or fax number) must be valid and capable of receiving an opt-out notice from the individual at all times for a period of 30 days after the date on which the Exempt Message is transmitted to the recipient; and
 - (c) the use of opt-out telephone numbers or short number codes provided in the opt-out notice does not result in the recipient incurring any cost additional to the cost normally incurred in sending a text message or fax message.
21. Even if the conditions in paragraph **20** are satisfied, the exemption will not apply if (i.e. you must not send the Exempt Message), at the time of the transmission of the Exempt Message, the user or subscriber of the Singapore telephone number has :
- (a) withdrawn any previous consent that he had given you to sending him a Marketing Message and the prescribed period described at paragraph **50** has expired;
 - (b) opted out from receiving any Exempt Message at their Singapore telephone number by submitting an opt-out notice to the sender and a period of 30 days after the date on which the opt-out notice was submitted has lapsed; or
 - (c) in any way indicated to you or the Organisation that he does not consent to you or the Organisation sending him any Marketing Message to his Singapore telephone number.

Ongoing Relationship

22. An ‘ongoing relationship’ is defined as a relationship which is on an ongoing basis, between the Organisation and a subscriber/user of a Singapore telephone number, which arises from the carrying on or conduct of a business or activity (commercial or otherwise) by the Organisation. The business or activity need not be for profit.
23. Ongoing relationships are also not limited to commercial relationships. Relationships which arise from regular participation in the activities of the Organisation may also be considered to be an ongoing relationship between the individual and the Organisation. An example of such non-commercial relationships includes students of a school or a donor with a standing order to regularly donate to a charity. Other examples of ongoing relationships include existing insurance policy holders, existing credit card customers and existing subscribers to a rewards programme.

24. Note that this exemption does not apply where, at the time of the transmission of the Exempt Message, the ongoing relationship between the Organisation and the subscriber/user of the Singapore telephone number has ceased.

Related to the subject of the ongoing relationship

25. Even if the Organisation has an ongoing relationship with the individual, you are not permitted to send any Exempt Message unless the purpose of the Exempt Message is related to the subject of the ongoing relationship between the Organisation and the individual.

Illustration A: Organisation Z is in the business of selling books. The individual has purchased Organisation Z's books. This is a standalone transaction. Organisation Z is not in an ongoing relationship with the individual.

Illustration B: The individual is a current holder of a unit trust KAR with Company Z. A message, the purpose of which is related to the subject of the ongoing relationship could be – "Sign up for more units in unit trust KAR at a special limited promotional price".

Illustration C: The individual has an existing gym membership with Company Z. A message, the purpose of which is related to the subject of the ongoing relationship could be – "New pilates programme commencing in April for members. Sign up now for an early bird discount".

Illustration D: The individual has signed up for service A offered by Company Z which has not expired. A message during the existence of service A, the purpose of which is related to the subject of the ongoing relationship could be – "Limited time offer. Sign up to renew your service A for a further 2 years at a promotional discount of 20%".

26. Procedures for obtaining consent are set out in the **Annex 1: Obtaining Consent Procedure**.

The Requirement to provide Contact Information

27. Any Marketing Message must contain clear and accurate information :

- (a) identifying the organisation that sent or authorised the sending of the Marketing Message;
- (b) on how the recipient of the Marketing Message can readily contact the sender; and
- (c) that is to be valid for at least 30 days after the recipient receives the Marketing Message.

28. A breach of this requirement is criminal.

Information identifying Organisation

29. With regard to paragraph **27** above, this is self-explanatory and it is achieved by stating the full registered name of the Organisation in the Marketing Message. This latter method should be the default position which you use. However, if you wish to embark on other means such as by using the Organisation's

website address as identification information, this is permissible as long as the individual can identify the Organisation using the information provided within the text of the website address itself or within the contents of the landing page which the address leads to.

Illustration A: A company called Petro Karlson, which runs an ecommerce website selling bags, sends the following message to its consumers: “You are invited to an online bag promotional event at www.PetroKarlson.com”. Company Petro Karlson would have provided adequate identification information.

Illustration B: Company QWE sells bathroom fixtures. It sends the following message to its consumers: “Come see our online sale at www.bathroomstuff.com”. Company QWE would have satisfied the requirement to provide sufficient identification information if the contents of the landing webpage easily allows the individual to identify Company QWE as the sender of the message. An example of such contents would be QWE’s logo and/or name being prominently displayed on the landing webpage.

Illustration C: XYZ Company sends the following message to its customers, “ABC product on sale! For more information, call Simon at [mobile number].” In this case, the recipient is able to identify Simon as a sender of this message.

Clear and accurate information to readily contact the Organisation

30. With regard to paragraph 27 above, you must ensure that the contact information in the Marketing Message enables the individual to directly contact you or the Organisation in a reasonably convenient manner. The contact information provided should be readily accessible from Singapore and operational during Singapore business hours. It should also be included within the message.

Illustration A: “From VBN”. “VBN invites you to view our latest promotions. Reply “1” for contact details”. No contact information has been provided within the message and the latter is not compliant. The correct approach would be where the Marketing Message states “From 98765432”. “VBN invites you to view our latest promotions. Contact us at [insert telephone number or email address] for more information”.

31. You must provide an operational Singapore telephone number or email address so that the individual can readily contact the Organisation. Short codes and “no-reply” email addresses are not to be used as they will not satisfy the requirement. Merely providing the physical address of the Organisation is also insufficient.
32. For more illustrations, please refer to Section 10 of the Advisory Guidelines on the Do-Not-Call Provisions issued by the Personal Data Protection Commission on 26 December 2013.

The Voice Call Calling Line Identity Prohibition

33. If the Marketing Message is in the form of a voice call/telephone call made to the recipient, the calling line identity must not be concealed from the recipient and the recipient must be able to see the calling line identity of the sender of the said call. “**Calling line identity**” means the telephone number or information identifying the sender.

34. In this regard, if a voice call/telephone call is made, the recipient must be able to see the actual telephone number of the sender and the sender information on his telephone/mobile phone must not read as 'Blocked', 'Unknown' or 'Private Number' or any other words to that effect.
35. A breach of this requirement is criminal.
36. The above 3 key requirements/ prohibition (Requirement to Check with the DNC Registry, The Requirement to provide Contact Information and The Voice Call Calling Line Identity Prohibition) apply to all senders of a Marketing Message (see paragraphs **20 to 21** above for the exemption applying to an Exempt Message). Under the PDPA, a sender of a Marketing Message covers the immediate person or organisation that sent the Marketing Message, and also includes the person or organisation that caused the Marketing Message to be sent or that authorised the sending of the Marketing Message. This means that no organisation can avoid the application of the above requirements or prohibitions by seeking to outsource the sending/making of such Marketing Messages to another party whether located locally or overseas, as under the PDPA, the person or organisation that engaged the outsourced service provider will still be viewed as the sender of the Marketing Message.
37. A breach of any of the above 3 key requirements/ prohibition is criminal. You MUST strictly comply with the above 3 key requirements/ prohibition. A breach of the above by you may not only mean that you have committed a criminal offence, it will also subject you to disciplinary proceedings and possible termination of your employment, by the Organisation.

Messages NOT impacted by the DNC regime/framework

38. The following Messages made/sent either by way of a voice call, SMS/MMS or fax, are deemed not to be Marketing Messages and are therefore not subject to the DNC regime/framework :
 - (a) those sent by a public agency under, or to promote, any programme carried out by any public agency which is not for a commercial purpose;
 - (b) those sent by an individual acting in a personal or domestic capacity. These are purposes to do with an individual's personal, family or household affairs. For example, when an individual keeps a database of his or her friends' and relatives' names, addresses, contact numbers and birthdates for his or her own personal use, he or she is considered to be acting in a personal or domestic capacity. His or her keeping of the database will not be covered under the PDPA;
 - (c) those which are necessary to respond to an emergency that threatens the life, health or safety of any individual;
 - (d) those the sole purpose of which are:
 - (i) to facilitate, complete, or confirm a transaction that the recipient of the message has previously agreed to enter into with the sender;

For example, a customer contacts you in your capacity as a sales person of a company to purchase a product from you. He informs you over the phone that he wishes to purchase the product. You thereafter proceed to obtain administrative details from him such as his credit card information in order to complete the transaction. The phone connection is suddenly cut off or he says that he needs to rush off for a meeting and would like to complete the transaction later. You subsequently call him to complete the transaction.

Another example would be as follows: you hold a road show to sell membership for a lifestyle club. During the peak lunch-hour period, you and your colleagues are busy attending to individuals who wish to sign up for membership. There are other potential customers waiting in queue to sign up as well. Some of them are unable to wait and you hand them an appropriately worded form which states that they wish to purchase a membership and that they would like you to contact them to complete or confirm the purchase. They leave their contact details including telephone number for you to contact them.

It is important that such a Message made is for the abovementioned sole purpose only. In a case where the Message includes any other marketing purpose(s) such as where you send a Message which consists of not only the purpose of completing the customer's purchase but also the ancillary purpose of sending the customer advertisements for other products/services, this would be caught by the requirements of the DNC regime/framework as it would not be a message the sole purpose of which is to facilitate, complete or confirm a transaction that the customer has previously agreed to enter into. It would thus be considered a Marketing Message and the requirements of the DNC regime/framework would apply.

- (ii) to provide warranty information, product recall information or safety or security information with respect to a product or service purchased or used by the recipient of the message;

For example, an SMS or telephone call made to a customer who had previously purchased a product from you to inform him that the product he had purchased has been recalled for safety lapses, would not be considered a Message that is governed by the DNC regime/framework.

- (iii) to deliver goods or services, including product updates or upgrades, that the recipient of the message is entitled to receive under the terms of a transaction that the recipient has previously agreed to enter into with the sender;

For example, a customer has purchased a piece of furniture from Company A. On the day of delivery, Company A may call the customer's Singapore telephone number to speak to the customer to facilitate delivery of the furniture such as liaising on the time of delivery.

- (iv) to conduct market research or market survey;

The terms 'market research' or 'market survey' are unfortunately not defined in the PDPA. Do note however that in order for the exception of 'market research' or 'market survey' to apply, the research or survey done must be for the purpose of determining the perception of the 'market' as a whole. As an illustration, if a customer has made a purchase at your retail outlet or if you run a hotel and you have a customer who has just stayed at your hotel, and you send an SMS to that customer's mobile phone to carry out a survey on whether he enjoyed his stay at the hotel or his purchase at the retail outlet, this exception would not apply as such survey is not a 'market survey' but simply a survey to ascertain whether that customer had a good experience from his recent dealings with your organisation. Such Message would therefore not fall under the exception and the full requirements of the DNC regime/framework would apply.

- (e) those the sole purpose of which are to provide :
 - (i) notification concerning a change in the terms or features of;
 - (ii) notification of a change in the standing or status of the recipient of the message with respect to;
 or

- (iii) at regular periodic intervals, account balance information or other type of account statement with respect to,

a subscription, membership, account, loan or comparable ongoing commercial relationship involving the ongoing purchase or use by the recipient of goods or services offered by the sender; or

An example is as follows: Company Z operates an online shopping website where it sells clothes and home lifestyle products at a 20% discount off similar products bought from a physical retail outlet, to members who join its membership programme. One of the conditions of this programme is that members would need to use real monies to exchange for shopping credits issued by Company Z and to use such credits to make purchases on the online shopping portal. If Company Z sends an SMS or makes a voice call to its member, solely to provide information on that member's account balance and such sending of the SMS or voice call are at regular periodic intervals, the above exception would apply.

Another example is as follows: Bob has purchased an online subscription to an online magazine. At the time of subscription, Bob had agreed to a set of terms and conditions. During the lifetime of Bob's subscription, the publisher of the online magazine updates and makes some amendments to its terms and conditions, and sends Bob an SMS or makes a telephone call to Bob informing him of the change in terms.

- (f) any message sent to an organisation other than an individual acting in a personal or domestic capacity, for any purpose of the receiving organisation; or

This exception is targeted at taking business to business Messages outside of the ambit of the DNC regime/framework. For example, Terry is a representative of Fantastic Insurance Pte Ltd. He wishes to sell or promote a new corporate medical insurance package to Serious Packers Pte Ltd which Serious Packers Pte Ltd can purchase for its staff. He previously had met Serious Packers Pte Ltd's human resource manager and she had given him her name card, on which is printed her mobile number. He makes a call to that mobile number and starts speaking to the said human resource manager about this corporate medical insurance cover. As the call is for the purpose of Serious Packers Pte Ltd and not for the personal benefit of the human resource manager, this exception applies. However, Terry must be careful that during the call he does not speak at all about any products or services that can benefit the human resource manager personally such as personal medical insurance – if he does so, this exception no longer applies and the DNC regime/framework would apply.

39. Messages which are not Marketing Messages, as defined at paragraph 38 above, would naturally not be covered by the DNC regime/framework. An example of this would be if the Organisation has a job opening and makes a phone call to the mobile phone of a friend of an existing staff who had recommended that friend for the job to the human resource department of that Organisation. If the human resource manager merely calls that friend for the purpose of recruiting her for this job opening, that is considered not to be a Marketing Message.

40. As you can see, Marketing Messages essentially cover all messages of a marketing nature. There may however be some instances in which you intend to call someone or send an SMS/MMS or a fax to someone where you are not sure whether it is a Marketing Message. ALWAYS err on the side of caution. If you are unsure whether such Message constitutes a Marketing Message, then the default position should be that you treat it as a Marketing Message and comply with the requirements of the PDPA with respect to dealing with Marketing Messages. Alternatively, always seek clarification from the Organisation's Data Protection Officer on whether a call, SMS/MMS or a fax would be considered a Marketing Message if you are unsure. The effect of a breach of the DNC regime/framework is criminal and it may mean that the

Organisation or you, or both you and the Organisation would have committed a criminal offence as a result of the call, SMS/MMS or fax that you make.

Extra-territorial Effect

41. The requirements and prohibitions of the DNC regime/framework have extra-territorial effect. They apply where :
- (a) the sender of the Marketing Message is in Singapore when the Marketing Message is sent to a Singapore telephone number, regardless of whether the device with that Singapore telephone number is in Singapore at the time that the Marketing Message was sent; or
 - (b) the recipient of the Marketing Message is in Singapore when the Marketing Message is accessed. This means that if the sender is overseas, the DNC regime would nevertheless still apply to that sender.
42. As mentioned at paragraph **36** above, the party that will be liable for a breach of the DNC regime will be the sender of the Marketing Message in question. It is not possible to avoid the application of the DNC regime/framework by outsourcing the sending of Marketing Messages to an overseas service provider or a local service provider. This is because the PDPA considers a sender of a Marketing Message to include not only the person or organisation that has in fact sent or made the Marketing Message, but also any person or party who causes or authorises the sending of the Marketing Message. Hence, if your organisation outsources the making of marketing voice calls to a third party call centre that is based in the Philippines and that call centre breaches the DNC regime/framework, the parties in breach would include the Philippines call centre as well as your organisation.

Engaging Third Party Service Providers to send Marketing Messages

43. Before you engage any third party service provider to send Marketing Messages on your Organisation's behalf, you must ensure that your Data Protection Officer is notified in writing about it (you may choose to send your Data Protection Officer an email in this regard) and that such engagement has been authorised by your Organisation. You must also ensure that there is a written contract in place between your Organisation and the third party service provider. One of the purposes of having such a written contract in place is to impose certain obligations on the third party service provider in relation to the Marketing Messages that it sends on the Organisation's behalf. This is extremely important for protecting the Organisation and ring-fencing its liability. Hence, do not engage such a third party service provider until there is a written contract in place that had been approved by the Data Protection Officer and the Organisation and legal issues, if any, have been addressed.

Clear and Unambiguous Consent

44. As mentioned at paragraph **16** above, where the Organisation has obtained clear and unambiguous consent from an individual to send Marketing Messages to that individual's Singapore telephone number, there would be no need to check the DNC Registry to confirm that the individual's Singapore telephone number has not been registered on the relevant DNC Registers. This consent must be obtained from the

user or subscriber of the Singapore telephone number. Even if that individual proceeds to register his Singapore telephone number on a DNC Register after providing clear and unambiguous consent, you can still rely on that clear and unambiguous consent to continue sending him Marketing Messages. However, do note that the individual can at any time withdraw such consent that he had previously given the Organisation.

Consent obtained prior to 2 January 2014 – existing consumers

45. Note that such clear and unambiguous consent from an individual to send Marketing Messages to that individual's Singapore telephone number can be obtained from an individual prior to 2 January 2014 and such consent would be valid. However, do note that the individual who has given his consent can similarly withdraw his consent prior to or after 2 January 2014 and such withdrawal will need to be acted upon as described below at paragraphs **47 to 55**.

Consent beyond what is reasonable to provide the product or service

46. As a representative of the Organisation, you must ensure that if you wish to obtain the abovementioned consent from an individual to send Marketing Messages to that individual's Singapore telephone number, such consent cannot be made a condition for the Organisation to provide the individual with a product or service that the individual is purchasing from the Organisation, if it is beyond what is reasonable to provide the individual with the said product or service.

Illustration A: Terry wishes to open a simple plain vanilla savings account with Bank XYZ. There is a contractual term in Bank XYZ's savings account contract terms that stipulates that Bank XYZ is permitted to send Marketing Messages to Terry. In this illustration, as the term that allows Bank XYZ to send Marketing Messages to Terry has been made part of the savings account's standard terms and conditions for which Terry is not able to disagree to, such term has been made a condition for Bank XYZ to provide the product/service to Terry which is a simple plain vanilla savings account. In order to operate and administer the savings account, logically there would be no reasonable necessity for Bank XYZ to send Marketing Messages to Terry. Hence, in such a case, such consent extracted from Terry has not only been made a condition of providing that product/service, but is also beyond what is reasonable to provide that product/service. Hence, any consent extracted by such means would be invalid and equivalent to there being no consent at all.

Illustration B: Sarah purchases a washing machine from Electricole Department Store. The sales representative hands Sarah a form for her to provide her contact details such as name, address, Singapore telephone number and to indicate whether she wishes to receive marketing messages and calls as well as other forms of marketing materials from Electricole Department Store. The sales representative informs Sarah that if she agrees to receiving such marketing materials and messages, to simply complete the form and sign off. The sales representative informs Sarah that it is an optional form and that if she does not wish to receive such marketing messages and materials, that she need not complete the form. Sarah decides not to complete the form. Even though Sarah did not complete the form, Electricole Department Store continues with the sale transaction and sells the washing machine to Sarah. What Electricole Department Store has done complies with the PDPA in that it has not made consent to receiving marketing messages and marketing materials from Electricole Department Store a condition of the purchase transaction. Sarah was given a choice to opt-in to receive such Marketing Messages.

Illustration C: *Feel Great Pte Ltd is in the healthcare business, selling various health related products to its customers who are mainly consumers. Many customers have signed up with Feel Great Pte Ltd's VIP membership which simply permits VIP members to obtain a 20% discount off any purchases of Feel Great Pte Ltd's health products. Feel Great Pte Ltd had never obtained its VIP members' express consent to receiving marketing SMSes or marketing voice calls on Feel Great Pte Ltd's latest products or promotions. However, it had consistently sent such marketing SMSes and made such marketing voice calls in the last several years as there was no law prohibiting it. Now, in order to deal with the DNC regime/framework, Feel Great Pte Ltd decides to send a letter to each VIP member to inform them that it intends to use their existing Singapore telephone numbers that are on Feel Great Pte Ltd's database to send them marketing SMSes and make marketing voice calls on Feel Great Pte Ltd's products and promotions. The letter continues to state that if the VIP member does not wish to receive such marketing SMSes or marketing voice calls, that the VIP member would need to complete the 'Marketing Opt-Out Form' that is enclosed together with the letter and return the same to Feel Great Pte Ltd by a specified date. It is also stated in the letter that if Feel Great Pte Ltd does not receive such 'Marketing Opt-Out Form' by the specified date, that the VIP member is then considered by Feel Great Pte Ltd to have agreed to Feel Great Pte Ltd sending such VIP member marketing SMSes and making marketing voice calls to such VIP member. Feel Great Pte Ltd has in other words, used an opt-out approach to obtain consent from its VIP members. Feel Great Pte Ltd's approach as described above is incorrect. Consent that is to be obtained from an individual for the purpose of the DNC regime/framework must always be on an opt-in basis and not on an opt-out basis. Essentially, if Feel Great Pte Ltd uses this approach, the law will view there to be no consent given from the individual. In order for any consent obtained to be valid, Feel Great Pte Ltd must approach it by way of Illustration B above.*

Withdrawal of Consent

47. The consent that had been previously given by a user or subscriber of a Singapore telephone number can be withdrawn at any point of time, in any of the following form, be it by SMS, email, telephone call or even in-person.
48. If you receive any withdrawal of consent by an individual to receiving Marketing Messages, you must immediately act upon it. Your receipt of such a withdrawal of consent by that individual is deemed to be a receipt by your employer, i.e. the Organisation, of the withdrawal of consent.
49. Pursuant to the requirements of the PDPA, once the Organisation receives a withdrawal of consent from an individual, the Organisation has only a certain prescribed period within which to ensure that thereafter, the individual no longer is sent any further Marketing Messages by the Organisation and its agents. Should the Organisation fail to ensure this or should an individual's withdrawal of consent be somehow overlooked by the Organisation and the Organisation still sends that individual a Marketing Message after the expiry of the prescribed period, such activity would be a breach of the DNC regime and will constitute a criminal offence.
50. The abovementioned prescribed period by which an Organisation must ensure that the individual no longer receives any Marketing Messages from the Organisation and its agents after the said prescribed period is :
 - (a) 60 days, for a notice of withdrawal given by an individual from 2 January 2014 to 1 July 2014 (inclusive); and
 - (b) 30 days, for a notice of withdrawal given on or after 2 July 2014.

51. Hence, if you receive a request from an existing or non-existing client seeking to withdraw his/her consent to receiving Marketing Messages by **any mode of communication**, you must advise the individual to contact DPU at dataprotection@proinvest.com.sg for his/ her request to be processed.
52. If you receive some form of communication from an existing client (such as an email) that is vague and you are unclear on whether the individual is seeking to withdraw his consent to receive Marketing Messages but you have in any case an impression (even if it is a weak impression) that the individual appears to be seeking to withdraw his/ her consent to receive Marketing Messages, you must clarify with the individual, advise the individual to contact DPU at dataprotection@proinvest.com.sg for his/ her request to be processed.
53. As describe in paragraph 51, if you receive a request from an existing client to unsubscribe from receiving Marketing Messages through text messages, you must forward the request via an email to dataprotection@proinvest.com.sg about it that contains the following mandatory information:
 - (a) name of the existing client;
 - (b) NRIC/ Passport Number of the client;
 - (c) Date and time of un-subscription message sent by that client to withdraw his/ her consent
 - (d) Phone number(s) to be un-subscribed
54. Procedures and time lines for dealing with all withdrawal of consent are set out in **Annex 7: Withdrawal of Consent Procedure**.
55. Ignoring any communication from an individual where he is seeking to withdraw his consent to receive Marketing Messages or to act slowly in dealing with any such communication is conduct that is not accepted by the Organisation and will be viewed by the Organisation as a breach of your employment/representative contract with the Organisation and subject you to disciplinary proceedings as well as possible termination of your employment with the Organisation.

Checking the DNC Registers

56. If clear and unambiguous consent has not been obtained or has been withdrawn, as mentioned at paragraph 14 above, and you wish to send a Marketing Message to a Singapore telephone number, you will need to have within a certain prescribed period (see below) prior to sending the Marketing Message, check with the DNC Registry whether that Singapore telephone number is registered on the relevant DNC Register. You will only be able to send the Marketing Message after you have checked the DNC Registry and the results show that the Singapore telephone number is not registered on the relevant DNC Register.

Illustration A: Bob, a sales manager of a company, wishes to send Sharon a Marketing Message via SMS and voice call. Before sending the Marketing Message, Bob must have checked with the DNC Registry to ascertain whether Sharon's Singapore telephone number has been registered on the relevant registers for SMS and voice call. If the result of the check with the DNC Registry states that Sharon's Singapore telephone number has been registered on the voice call register but not on the SMS register, it means that Bob can only send the marketing SMS to Sharon but not make a marketing call to Sharon. If the result of the check shows that Sharon's Singapore telephone number has been registered on the voice call register as well as

the SMS register, Bob must not make the marketing voice call nor send the marketing SMS to Sharon.

Illustration B: Company Y wishes to send James a Marketing Message via SMS and fax. Company Y must have checked with the DNC Registry to ascertain whether James' Singapore telephone number has been registered on the relevant registers and obtained a result that James' Singapore telephone number has not been registered before sending that Marketing Message to James. If the result of the check with the DNC Registry states that James' Singapore telephone number has been registered on the SMS register but not on the fax register, it means that Company Y can only send the marketing fax message to James but not send a marketing SMS to James.

57. For the process to be followed when checking the DNC Registry, please refer to **Annex 9: DNC Individual Account Guide**. Note that this is only a summary, for full details please visit www.dnc.gov.sg.

Validity Period of results received

58. When you check a Singapore telephone number against the DNC Registry, you will receive a confirmation from the DNC Registry on whether the telephone number in question is registered in the relevant DNC Register or not. Subject to further changes from the PDPC, if you see the notation "NR", it means the telephone number in question is not registered with the DNC Register in question. If you see the notation "DNC", it means the telephone number in question is registered with the DNC Register in question.

Mandatory Safekeeping of Results Received

59. For any and all results that you receive from the DNC Registry on your checks, you must keep a copy of the same for future verification or investigation, especially if at a future date there is a dispute as to whether you had checked the DNC Registry or whether a particular telephone number was registered or not.
60. Further, the results of the check that you receive from the DNC Registry will provide you with a validity period for those telephone numbers which you have checked. It is very important that you always bear in mind the validity period stated on the results of each telephone number. You must keep track and maintain a list of each number together with the validity period for each respective mode of communication. The validity period of results of the checks received will be as follows :

Date Results of Checks Received	Validity Period
2 January 2014 to 31 May 2014 (both dates inclusive)	60 days from receipt of results
1 June 2014 to 1 July 2014 (both dates inclusive)	Until 31 July 2014
From 2 July 2014 onwards	30 days from receipt of results

61. The results of each check received from the DNC Registry will expressly show the validity period. Please look out for this validity period. You must rely on the validity period as printed in the results received from

the DNC Registry, unless it appears out of sync with the validity periods as described above. In such an event, please check with the Data Protection Officer.

62. Do note that if the user/subscriber of a Singapore telephone number subsequently registers his telephone number, perhaps the day after you have made a check with the DNC Registry on his telephone number, you can still send him the Marketing Message in reliance on the results of the check received from the PDPC and the validity period as stated on the results slip.

***Illustration:** On 25 January 2014, Company A wishes to send Derek a marketing SMS and make a marketing voice call to Derek's Singapore telephone number. Company A on 15 January 2014, checks with the DNC Registry and receives a result slip from the PDPC on 16 January 2014. It is printed on the results slip that the validity period of the check expires on 15 March 2014 (i.e. 60 days later). The results slip states that Derek's Singapore telephone number has not been registered for the SMS/MMS and voice call DNC Registers. On 18 January 2014, Derek registers his Singapore telephone number with the SMS/MMS and voice call DNC Registers. Company A is still permitted to send Derek the marketing SMS/MMS and marketing voice call until 15 March 2014, in reliance on the results stated in the results slip and regardless of the fact that Derek has registered his Singapore telephone number with the SMS/MMS and voice call DNC Registers on 18 January 2014.*

63. Once the validity period for a check on a Singapore telephone number has expired, you must re-check that Singapore telephone number with the DNC Registry to ensure that it is not registered in the relevant DNC Registers before sending a Marketing Message to that Singapore telephone number. You are not allowed to send marketing message to the Singapore number once the validity period had lapsed.
64. A checklist that you should refer to before sending a Marketing Message to a Singapore telephone number can be referred to in **Annex 10: Checklist for procedure prior to the sending of Marketing Messages**.

Receiving Leads from Third Parties (E.g. Referrals/ Introducers)

65. In the course of the performance of your operations, you may receive customer leads from third party sources. For example, your organisation may have a 'Refer a Friend' scheme, where an existing customer refers a friend to the Organisation with the hope that the Organisation can subsequently obtain business from that friend. That existing customer could very well pass you the Singapore telephone number of his friend for you to make a marketing call or send a marketing SMS.
66. In light of the requirements and prohibitions in the DNC regime/framework, you must not simply rely on any lead given by any third party source and send a Marketing Message to that lead's Singapore telephone number. If you wish to do so, you must abide by the process contained at paragraphs **67 to Error!** eference source not found. below.

Warranty of required consent

67. In a scenario where you obtain customer leads' contact details from a referral (such as a referral from an existing customer or introducer), you must obtain a warranty/declaration from them that they have obtained the necessary consent of the individual whose personal data is to be disclosed to you, for both you and the Organisation to collect their personal data, for the Organisation (and you) to process such personal data to

send them Marketing Messages⁵, and for the Organisation (and you) to send them Marketing Messages by SMS/MMS, voice call or fax (per the consent that they had provided). Please refer to **Annex 12: Client Referral Form**.

68. You must not contact the customer leads unless the referrer has declared that the customer leads that he provides are legitimate and are indeed consented by the leads themselves. However, if you have any concerns as to whether the leads have actually consented to receiving such marketing calls or SMS, you should check the Singapore telephone numbers provided to you against the DNC Registry before making any marketing messages over voice calls, SMS or fax to the leads. In the alternative, you may wish to send emails to these leads to seek their consent for you to call or send SMS or faxes to them.
69. If you are uncertain, please contact the DPU for clarification.

Referring Leads to Third Parties (E.g. Referral Service Partners/ Introducer)

70. In the course of the providing financial services to customers, there may be a need to pass on referral leads to a PIAS Referral Service Provider such as financial institutions, will writing, tax and estate planning companies for such PIAS Referral Service Providers to contact the customer to market their products and services.
71. In light of the requirements and prohibitions in the PDPA, you must not simply pass such leads to third party providers without first obtaining the consent of the customer. If you wish to do so, please ensure that the client signs on the "Consent to Refer Form". Please refer to **Annex 13: Consent to Refer Form** which is to be completed by the PIAS client before, he/ she is referred to any PIAS Referral Service Partner (Please refer to <http://www.proinvest.com.sg/our-services/global-product-service-providers>) or any introducing activity is conducted. A soft copy of the completed form is to be forwarded to DPU at dataprotection@proinvest.com.sg within 3 working days.
72. Please note that under the PDPA, in the event that the PIAS client withdraws his/ her consent for the referral, you will have to inform the Referral Service Partner of such withdrawal accordingly within 3 working days.

Breach of DNC Regime/Framework

73. A breach of the DNC regime/framework is criminal. This means that if you send a Marketing Message in breach of the requirements of the PDPA, you and/or the Organisation would have committed a criminal offence. Apart from being a criminal offence, you and/or the Organisation would also have to pay a financial penalty to the authorities.
74. Should you cause the Organisation to be in breach of the requirements of the PDPA relating to the sending of Marketing Messages as a result of your failure to strictly adhere to this policy or as a result of your action or omission, you will be subject to disciplinary proceedings including possible termination of your employment by the organisation. Additionally, the Organisation will not hesitate to seek compensation from you for any loss or damage suffered by the Organisation, arising from your action or omission.

⁵ Note that this requirement of obtaining a warranty from a third party that he has obtained the necessary consent from the individual to provide the individual's personal data to the Organisation applies equally where the purpose of the disclosure is for purposes other than to send that individual a Marketing Message.

The Interplay between the DNC Regime/Framework and the Consent and Purpose Data Protection Principles

75. The PDPA consists of two parts which every organisation needs to comply with. One part comprises the DNC regime/framework while the other part consists of the 8 data protection principles. The DNC regime/framework will come into force first on 2 January 2014. The 8 data protection principles will follow after and come into force on 2 July 2014. These two parts relate to different aspects of data protection but function as a whole when it comes to determining if an organisation has discharged its data protection obligations. Therefore, adherence to one part of the PDPA does not necessarily mean that you are not in breach of the other part. From 2 July 2014 onwards, when sending Marketing Message you must ensure not only that the requirements of the DNC regime/framework are complied with but also that you have abided by the requirements of the 8 data protection principles. For further information on the 8 data protection principles please refer to the Organisation's other policies (to be issued at later dates).

Illustration A: Company A wishes to send Tony a marketing SMS on 7 August 2014. The assumption here is that there is no ongoing relationship between Company A and Tony. Company A had on 31 July 2014 checked with the DNC Registry that Tony's Singapore telephone number is not registered on any of the DNC Registers. Company A therefore proceeds to send Tony the marketing SMS on 7 August 2014. Assuming that Company A complies with the other requirements of the DNC regime/framework, Company A would not have breached the DNC regime/framework. In sending that marketing SMS, Company A would have had to process Tony's personal data. Assuming that Company A did not obtain Tony's consent to such processing and no exception to processing without consent applies, Company A would have breached the consent and purpose data protection principles as such data protection principles are already in force since 2 July 2014.

76. As the DNC regime/framework comes into force first, it is possible for you to send a Marketing Message to an individual whose Singapore telephone number you have checked is not registered on the DNC Registry, without breaching the 8 data protection principles (this is because the 8 data protection principles do not come into force until 2 July 2014). This will only apply to Marketing Messages sent during the period between 2 January 2014 and 1 July 2014 (inclusive).

Illustration B: Company A wishes to send Carrie a marketing SMS and make a marketing voice call to Carrie on 20 March 2014. The assumption here is that there is no ongoing relationship between Company A and Carrie. Company A had on 15 March 2014 checked with the DNC Registry that Carrie's Singapore telephone number is not registered on any of the DNC Registers. Company A therefore proceeds to send Carrie the marketing SMS and to make the marketing voice call on 20 March 2014. Assuming that Company A complies with the other requirements of the DNC regime/framework, Company A would not have breached the DNC regime/framework. In sending that marketing SMS and making that marketing voice call, Company A would have had to process Carrie's personal data. Assuming that Company A did not obtain Carrie's consent to such processing and no exception to processing without consent applies, Company A would not have breached the consent and purpose data protection principles as such data protection principles are not in force until 2 July 2014.

Registering a Singapore Business Telephone Number with the DNC Registers

77. Each employee of the Organisation is provided with one or more Singapore business telephone numbers (whether mobile or landline), to conduct business for the Organisation. Such Singapore business telephone

numbers can be registered in the DNC Registers if the intention is to prevent any Marketing Message to be sent to such Singapore business telephone number.

78. With respect to the Singapore business telephone numbers that have been provided to you or assigned to you by the Organisation for you to conduct business for the Organisation, you are not to register any of these Singapore business telephone numbers with the DNC Registers without the approval of the Data Protection Officer and the Organisation.
79. Any registration of any of the Organisation's Singapore business telephone numbers (whether mobile or landline) that it maintains for all its employees, will be the decision of the Organisation and not yours and carried out centrally by the Data Protection Officer.

Amendments

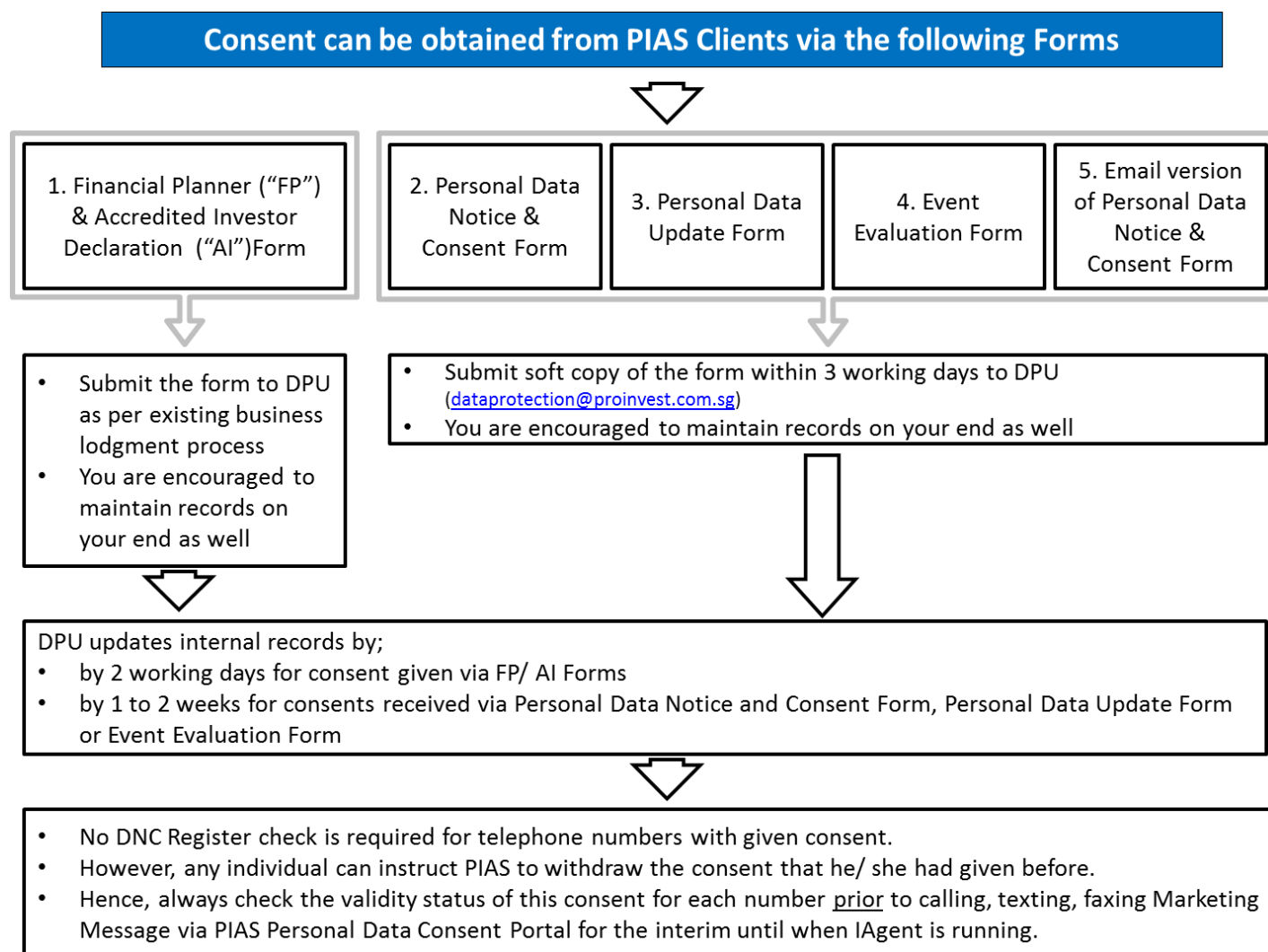
80. The Organisation reserves its right to amend this policy from time to time. Any such amended policy will similarly apply to you and become part of your employment contract with the Organisation.

Data Protection Officer

81. If in doubt on any aspect of the DNC regime/framework or this policy, please do not hesitate to forward your enquiries to the Data Protection Unit at dataprotection@proinvest.com.sg.

ANNEX

Annex 1: Obtaining Consent Procedure



Annex 2: Personal Data Notice & Consent Form

<div style="margin-left: 20px;"> <h3 style="margin: 0;">Personal Data Notice & Consent Form</h3> </div>	
<div style="border: 1px solid black; padding: 2px; display: inline-block;"> <small>For adviser to complete</small> <small>P5 Code:</small> </div>	
*Client's Full Name as per NRIC/ Passport	
*NRIC (Passport No. for foreigner)	
Contact Details	
Postal Address	
Email Address	
Mobile No.	Office No.
Home No.	Fax No.
<small>*Mandatory field</small> Personal Data Notice and Consent Clause <p>1. I understand, acknowledge and consent to PIAS processing, collecting and using my personal data provided by me in this form and from time to time, to PIAS and disclosing my personal data to Permitted Parties for the following Purposes:</p> <ul style="list-style-type: none"> i) administering, servicing or dealing with the financial advisory services provided by PIAS (including processing your applications for financial products); ii) managing with your financial products that you have purchased pursuant to the financial advisory services provided by PIAS; iii) observing any legal, governmental or regulatory requirements of any relevant jurisdiction (including any disclosure or notification requirements to which PIAS is subject to); and iv) carrying out due diligence, monitoring or other screening activities in accordance with PIAS' legal or regulatory obligations or risk management procedures. v) providing me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of postal mail and electronic transmission to my email and postal address(es). For withdrawal of consent for marketing via email and/ or postal mail, please contact PIAS Data Protection Officer for more information at dataprotection@proinvest.com.sg. <p>2. <input type="checkbox"/> (Please tick <input checked="" type="checkbox"/> the box if you wish to provide your consent)</p> <p>By ticking the box, I hereby consent PIAS to collect and use my personal information to provide me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of telephone calls, SMS/MMS and facsimile to me, to the telephone number(s) provided by me to PIAS in this form and any other telephone number(s) provided by me to PIAS from time to time.</p> <p>I understand that if my consent is not provided, PIAS will be unable to provide me with such marketing and promotional information using such modes of communication.*</p>	

3. I hereby represent and warrant that I am the user and/or subscriber of all the telephone number(s) provided by me to PIAS from time to time (including without limitation the telephone number (s) provided by me to PIAS in this consent form and on all other forms, or documents from time to time), and that I have read and understood PIAS' Personal Data Notice and Consent Policy and the above provisions.

* For details about PIAS' Personal Data Notice and Consent Policy, please visit <http://www.proinvest.com.sg/about-pias/pdpa>.

Client's Signature

Date: _____

For Internal Use:

Received by	On	By
Dept.:	Date:	Staff:

Annex 3: Full Personal Data Consent Clause (<http://www.proinvest.com.sg/about-pias/pdpa>)

Notice of Purposes

The Personal Data Protection Act

The Personal Data Protection Act ("PDPA") establishes a general data protection law that governs the collection, use, disclosure of individuals' personal data by organisations. Personal data includes (but is not limited to) your name, NRIC/Passport number, telephone number(s), address etc.

The PDPA contains two main sets of provisions, covering data protection (the "DP Provisions") and the Do Not Call registry (the "DNC Provision"). The DNC Provisions have come into force on 2 January 2014 and the DP Provisions will come into force on 2 July 2014 respectively.

For more information about the PDPA, please click the following links below:

[PDPC website](#)

[DNC Registry website](#)

PIAS views data protection seriously and has taken measures to protect your personal data. When you apply for financial advisory services from PIAS, update us of your new particulars or attend our events and seminars, PIAS may need to collect your personal data. You may be required to complete a relevant application, update or consent form which contains a section on Personal Data Consent ("**Form**"). This Personal Data Notice and Policy ("**Policy**") contains the details of how PIAS will process, collect, use and disclose your personal data. You should read this Policy carefully before providing any consent to PIAS to process, collect, use and disclose your personal data.

PURPOSES FOR PROCESSING, COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

Purposes

To process, administer and/or manage your financial advisory services with PIAS, PIAS will necessarily need to process, collect, use and/or disclose your personal data or personal information about you. Such personal data includes information set out in any Forms and any other personal information provided by you from time to time or possessed by PIAS for the following purposes:

- i) administering, servicing, or dealing with the financial advisory services provided by PIAS (including processing your applications for any financial products);
- ii) managing the financial products that you have purchased pursuant to the financial advisory services provided by PIAS;
- iii) processing or carrying out your instructions or responding to any enquiry purporting to be given by you or on your behalf and dealing in any matters relating to the financial advisory services which you are entitled to receive (including sending you information on and invitations to seminars and events organised by PIAS, the mailing of correspondence or any other relevant document(s), to you, which could involve disclosure to certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages);
- iv) forming part of PIAS' records as to the business carried on by PIAS;
- v) observing any legal, governmental or regulatory requirements of any relevant jurisdiction (including any disclosure or notification requirements to which PIAS is subject to);
- vi) complying with PIAS and PIAS' related companies' policies and procedures (including without limitation any reporting and disclosure policies and procedures);

- vii) carrying out due diligence, monitoring or other screening activities in accordance with PIAS' legal or regulatory obligations or risk management procedures;
- viii) carrying out, processing and analysis of satisfaction surveys regarding PIAS' financial advisory services. and
- ix) If consented by you, providing you with marketing/ promotional information on new and/or other financial products and services which in the opinion of PIAS may be of interest or benefit to you, by way of telephone calls, SMS/MMS and facsimile to you to any telephone number provided by you to PIAS from time to time.

(collectively, the "**Purposes**")

PIAS may also be collecting from sources other than yourself, personal data about you, for one or more of the above Purposes, and thereafter, using, disclosing and/or processing such personal data for one or more of the above Purposes.

Disclosure

The personal data provided by you to PIAS may be disclosed by PIAS to the following parties (whether such parties are located or resident within or outside Singapore) for one or more of the above Purposes:

- i) financial institutions who may have need for such personal data in order to provide the financial products that you have purchased pursuant to the financial advisory services provided by PIAS (including without limitation any brokers and lawyers);
- ii) employees, officers, directors and agents of PIAS;
- iii) PIAS' related companies (to comply with PIAS and PIAS' related companies' policies and procedures);
- iv) PIAS' lawyers and auditors;
- v) any third party vendors employed or engaged to provide administrative, computer or other services or facilities to PIAS; and
- vi) any regulatory authority, government, dispute resolution or statutory body in Singapore and/ or other jurisdiction/s.

(collectively the "**Permitted Parties**").

Any such disclosure and transfer of personal data shall not be treated as a breach of any restriction upon the disclosure of personal data imposed on PIAS by law or otherwise.

Consent

By providing your consent to PIAS by signing on a Form, you hereby:

- i) consent to PIAS processing, collecting, using and/or disclosing your personal data for the Purposes as described above;
- ii) consent to PIAS collecting personal data about you from sources other than yourself and processing, using and/or disclosing such personal data, for the Purposes as described above; and
- iii) consent to PIAS disclosing your personal data to the Permitted Parties, for the Purposes as described above.

PIAS may amend this Personal Data Notice and Consent Policy from time to time by posting an amended version of this Personal Data Notice and Consent Policy on our website, and you agree to be bound by such amended Personal Data Notice and Consent Policy.

If you have any queries as to this Personal Data Notice and Consent Policy or how PIAS processes, collects, uses and discloses your personal data, please contact the Data Protection Officer at dataprotection@proinvest.com.sg.

Annex 4: Personal Data Update Form

PIAS PROFESSIONAL INVESTMENT ADVISORY SERVICES		Personal Data Update Form	
		For adviser to complete	
		PS Code:	
*Relationship with PIAS	<input type="checkbox"/> Client / <input type="checkbox"/> Ex-Employee / <input type="checkbox"/> Others: (please specify)		
*Client Full Name (as per NRIC/passport)			
*NRIC/Passport No. for foreigner			
Please fill up the relevant section of information which you will like to update. You may leave the other sections blank.			
Customer Information (Please attach a copy of your NRIC or Deed Poll)			
	Existing Details	New Details	
Client Full Name (as per NRIC/passport)			
NRIC/Passport No. for foreigner			
Nationality			
Address Details			
Residential Address			
Mailing Address			
Contact Details			
For overseas no. pls indicate "+" sign, country code + area code + contact number (e.g. +1234567890).			
	Existing Details	New Details	
Mobile No.			
Home No.			
Office No.			
Fax No.			
Email Address			
Remarks (if any)			

*Mandatory Fields

Personal Data Notice and Consent Clause

- I understand, acknowledge and consent to PIAS processing, collecting and using my personal data provided by me in this form and from time to time, to PIAS and disclosing my personal data to Permitted Parties for the following Purposes:
 - administering, servicing or dealing with the financial advisory services provided by PIAS (including processing your applications for financial products);
 - managing with your financial products that you have purchased pursuant to the financial advisory services provided by PIAS;
 - observing any legal, governmental or regulatory requirements of any relevant jurisdiction (including any disclosure or notification requirements to which PIAS is subject to); and
 - carrying out due diligence, monitoring or other screening activities in accordance with PIAS' legal or regulatory obligations or risk management procedures.
 - providing me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of postal mail and electronic transmission to my email and postal address(es).*

Personal Data Update Form

For withdrawal of consent for marketing via email and/ or postal mail, please contact PIAS Data Protection Officer for more information at dataprotection@proinvest.com.sg.

2. ☐ (Please tick ✓ the box if you wish to provide your consent)

By ticking the box, I hereby consent PIAS to collect and use my personal information to provide me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of telephone calls, SMS/MMS and facsimile to me, to the telephone number(s) provided by me to PIAS in this form and any other telephone number(s) provided by me to PIAS from time to time.

I understand that if my consent is not provided, PIAS will be unable to provide me with such marketing and promotional information using such modes of communication.*

3. I hereby represent and warrant that I am the user and/or subscriber of all the telephone number(s) provided by me to PIAS from time to time (including without limitation the telephone number (s) provided by me to PIAS in this consent form and on all other forms, or documents from time to time), and that I have read and understood PIAS' Personal Data Notice and Consent Policy and the above provisions.

* For details about PIAS' Personal Data Notice and Consent Policy, please visit <http://www.proinvest.com.sg/about-pias/pdpa>.

Client's Signature _____

Date: _____

For Internal Use:

Request Received by DPU	Date:	Name of DPU Officer/ Manager:
Request Handled By:	DPU/ AMU/ HR/ RM&C	Date of Receipt from DPU:
Correction Request Completion	Yes (State date of completion: _____)	
(If not completed, please specify reason)	No (State reason that correction is not completed: _____)	

Annex 5: Event Evaluation Form

PIAS PROFESSIONAL INVESTMENT ADVISORY SERVICES	<h2 style="margin: 0;">Event Evaluation Form</h2>
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For adviser to complete

P8 Code: _____

Seminar: _____ **Date:** _____

We would greatly appreciate if you could kindly take a few moments to complete this form, your feedback will help us improve our future seminars and services to you.

Full Name (as per NRIC/Passport): _____ Email Address: _____

Address: _____ Postal Code: _____

Telephone: (Mobile) _____ (Home) _____

Invited By (Adviser's Name): _____ Existing PIAS Client: ☐ Yes ☐ No

1. Did you find the venue convenient and suitable?

☐ Yes

☐ No

2. How did you find the seminar topic and its relevance to you?

☐ Yes

☐ No

3. How would you rate the duration of the event?

☐ Excellent

☐ Good

☐ Satisfactory

☐ Poor

4. Would you like to review your financial portfolio?

☐ Yes

☐ No

I would like to know more about (tick where applicable)

☐ Medical Protection

☐ Estate Planning

☐ Risk Insurance Planning

☐ Trust and Wills

☐ Children's Education Planning

☐ Mortgage and Refinancing

☐ Investment Planning

☐ Taxation Planning

☐ Retirement Planning

☐ CPF Minimum Sum Scheme (Annuity)

I am interested in making an appointment to discuss my financial situation and the most convenient day & time would be: _____

Any other comments: _____

Personal Data Notice and Consent Clause

- I understand, acknowledge and consent to PIAS processing, collecting and using my personal data provided by me in this form and from time to time, to PIAS and disclosing my personal data to Permitted Parties for the following Purposes:
 - administering, servicing or dealing with the financial advisory services provided by PIAS (including processing your applications for financial products);
 - managing with your financial products that you have purchased pursuant to the financial advisory services provided by PIAS;
 - observing any legal, governmental or regulatory requirements of any relevant jurisdiction (including any disclosure or notification requirements to which PIAS is subject to); and
 - carrying out due diligence, monitoring or other screening activities in accordance with PIAS' legal or regulatory obligations or risk management procedures.
 - providing me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of postal mail and electronic transmission to my email and postal address(es).
For withdrawal of consent for marketing via email and/or postal mail, please contact PIAS Data Protection Officer for more information at dataprotection@proinvest.com.sg.

- ☐ (Please tick ✓ the box if you wish to provide your consent)
By ticking the box, I hereby consent PIAS to collect and use my personal information to provide me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of telephone calls, SMS/MMS and facsimile to me, to the telephone number(s) provided by me to PIAS in this form and any other telephone number(s) provided by me to PIAS from time to time.

I understand that if my consent is not provided, PIAS will be unable to provide me with such marketing and promotional information using such modes of communication.*

- I hereby represent and warrant that I am the user and/or subscriber of all the telephone number(s) provided by me to PIAS from time to time (including without limitation the telephone number (s) provided by me to PIAS in this consent form and on all other forms, or documents from time to time), and that I have read and understood PIAS' Personal Data Notice and Consent Policy and the above provisions.
- I understand, acknowledge and consent to PIAS using photos taken at this event which may reflect my identity for publication in PIAS collateral and publicity purpose.

* For details about PIAS' Personal Data Notice and Consent Policy, please visit <http://www.proinvest.com.sg/about-pias/pdpa>.

Date: _____

Client's Signature

For Internal Use:

Received by DPU	On	By
	Date & Time:	DPU Officer/ Manager:

Annex 6: Email version of Personal Data Notice & Consent Form



SETTING THE PROFESSIONAL STANDARD
FOR FINANCIAL ADVICE IN SINGAPORE

Personal Data Notice & Consent

Dear Valued Client of PIAS,

With the implementation of the Personal Data Protection Act 2012 (PDPA) in Singapore, PIAS would like to seek your clear and unambiguous consent via this email to continue sharing informative marketing messages to your Singapore telephone number/s, even if it is registered with the DNC Registry. If you change your mind, you will be able to withdraw your consent from PIAS (subject to existing contracts).

Please assist to complete the below Personal Data Notice & Consent Form and send it back to your friendly PIAS Financial Consultant. If you have any enquiries, please do not hesitate to contact **Financial Consultant's Name** at **Insert Financial Consultant's Handphone Number** (mobile) or **Insert Financial Consultant's Email Address** (email).

Thank you.

Kind regards,

Professional Investment Advisory Services Pte Ltd



SETTING THE PROFESSIONAL STANDARD FOR FINANCIAL ADVICE IN SINGAPORE

Telephone +65 6372 5700 | Fax +65 6372 5950 | Email piasadmin@proinvest.com.sg

Head Office 6 Shenton Way, OUE Downtown 2, #09-08, Singapore 068809

Professional Investment Advisory Services Pte Ltd | <http://www.proinvest.com.sg/> | [Read disclaimer](#)

Personal Data Notice and Consent Form

I understand, acknowledge and consent to PIAS processing, collecting and using my personal data provided by me in this form and from time to time, to PIAS and disclosing my personal data to Permitted Parties for the following Purposes:

- i) administering, servicing or dealing with the financial advisory services provided by PIAS (including processing your applications for financial products);
- ii) managing with your financial products that you have purchased pursuant to the financial advisory services provided by PIAS;
- iii) observing any legal, governmental or regulatory requirements of any relevant jurisdiction (including any disclosure or notification requirements to which PIAS is subject to); and
- iv) carrying out due diligence, monitoring or other screening activities in accordance with PIAS' legal or regulatory obligations or risk management procedures.
- v) providing me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of postal mail and electronic transmission to my email and postal address(es).*

For withdrawal of consent for marketing via email and/ or postal mail, please contact PIAS Data Protection Officer for more information at dataprotection@proinvest.com.sg.

(Yes / No)*** *(Please delete as appropriate)*;

By opting for 'Yes' above, I hereby consent PIAS to collect and use my personal information to provide me with marketing, advertising and promotional information, materials and/or documents relating the financial advisory services provided by PIAS (including the financial products of PIAS' business partners and product providers) that PIAS may be selling, marketing, offering or promoting (whether such products or services exist now or are created in the future) which in the opinion of PIAS may be of interest or benefit to me, by way of telephone calls, SMS/MMS and facsimile to me, to the telephone number(s) provided by me to PIAS in this form and any other telephone number(s) provided by me to PIAS from time to time.

I hereby represent and warrant that I am the user and/or subscriber of all the telephone number(s) provided by me to PIAS from time to time (including without limitation the telephone number (s) provided by me to PIAS in this consent form and on all other forms, or documents from time to time), and that I have read and understood PIAS' Personal Data Notice and Consent Policy and the above provisions.

* For details about PIAS' Personal Data Notice and Consent Policy, please visit

<http://www.proinvest.com.sg/about-pias/pdpa>.

*****Please enter your full name:**

*****Please enter your NRIC/FIN/Others** *(Please delete as appropriate)*:

*****Date:** [Click here to enter a date.](#)

*** Please indicate that you agree to PIAS, its employees, agents and third party service providers using the modes of communication by deleting as appropriate.

For Internal Use:

Received by DPU	On	By
	Date & Time:	DPU Officer/ Manager:

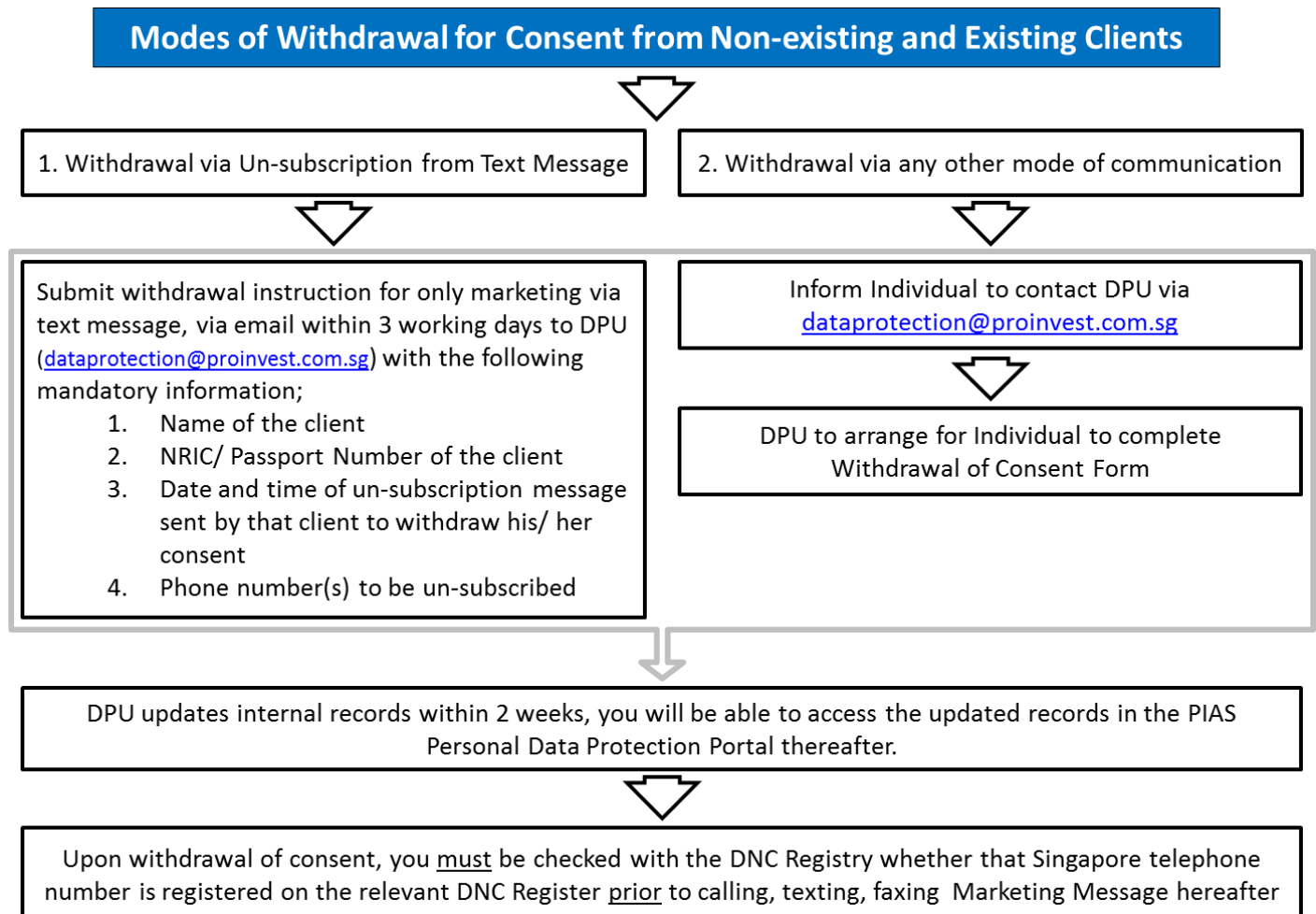
Co. Reg. No. 200106346Z

Disclaimer

This message contains privileged and confidential information from Professional Investment Advisory Services Pte Ltd. If you are not the intended recipient of this electronic message, please do not disseminate, copy or take any action in reliance on it. We request you notify us immediately before deleting this message. Any views expressed in this message or attachment/s are those of the individual sender, and are not necessarily the views of the company.

Professional Investment Advisory Services Pte Ltd uses virus scanning software and while due care and attention is taken; the company excludes all liability for any loss or damage caused whether directly or indirectly by any computer virus or other defects transmitted with any email and any attachment(s), to the extent permitted by law. It is sent on the strict condition that the user carries out and relies on its own procedures for ensuring that its use will not interfere with the recipient's systems including but not limited to scanning this email and any attachment(s) for viruses and defects before opening or sending them on. The recipient assumes all risk of use and releases the sender from all responsibility and liability for any direct or indirect consequence of use.

Annex 7: Withdrawal of Consent Procedure



Annex 8: Withdrawal of Consent Form (Client & Prospect)

PIAS PROFESSIONAL INVESTMENT ADVISORY SERVICES	<h2 style="margin: 0;">Withdrawal of Consent Form (Client & Prospect)</h2>
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Important Note

Upon completion, please email the complete form to dataprotection@proinvest.com.sg or mail to 6 Shenton Way, #09-08 OUE Downtown 2, Singapore 068809 (Attention to Data Protection Unit).

Section A: Personal Particulars (All fields are mandatory)

Full Name (as per NRIC/Passport)

NRIC/ Passport No for foreigner

Are you a client of Professional Investment Advisory Services Pte Ltd? (Please circle)

Yes / No

Section B: Withdrawal of Marketing Consent

1. I hereby withdraw my consent to allow PROFESSIONAL INVESTMENT ADVISORY SERVICES PTE LTD and its employees and advisers (collectively "PIAS") to collect, use and disclose my personal data for the purpose of sending me such marketing, advertising and promotional information through the following mode(s) of communication where I have indicated below:
 - i. ☐ Postal mail to my postal address(es);
 - ii. ☐ Electronic transmission to my email address(es);
 - iii. With respect to all my telephone number(s), by way of
 - (a) ☐ Voice / phone call*: _____
 - (b) ☐ SMS/MMS*: _____
 - (c) ☐ Facsimile*: _____

*Please specify the number which you wish to withdraw.
2. I represent and warrant that I am the user and/or subscriber of the telephone number(s) previously provided by me or in this Form.
3. I hereby understand that I may continue to receive Marketing message through the mode(s) of communication selected above within the next 30 days from the date of receipt of my written request to PIAS.
4. I understand that PIAS will cease sending marketing, advertising and promotional information to me via the mode(s) of communication selected above.
5. I have read and understood the provisions stated in this Form.
6. I understand that I will need to provide fresh consent to PIAS should I wish to receive marketing information and/or promotional offers from PIAS again in future.

Withdrawal of Consent Form (Client & Prospect)

Section C: Withdrawal of Personal Data Consent

1. ☐ I hereby withdraw my consent to allow Professional Investment Advisory Services Pte Ltd and its employees and advisers (collectively known as "PIAS") to collect, use and disclose my personal data for the purpose of:
 - (i) Administering, servicing, dealing with the financial advisory services provided by PIAS (including managing my financial products and investment portfolios);
 - (ii) Managing my financial products that I have purchased pursuant to the financial advisory services provided by PIAS;
 - (iii) Observing any legal, governmental or regulatory requirements of any relevant jurisdiction (including any disclosure or notification requirements to which PIAS is subject to); and
 - (iv) Carrying out due diligence, monitoring or other screening activities in accordance with PIAS' legal or regulatory obligations or risk management.
2. Please note that PIAS may have to stop providing you with some or all financial advisory services should you withdraw your consent for PIAS to collect, use and disclose your personal data for this purpose. However, PIAS may still collect, use and disclose your personal data without your consent if permitted by applicable laws.
3. I understand that PIAS may cease collecting, using and disclosing my personal data within 30 days from the date of receipt of the completed Form.
4. I understand that I will need to provide fresh consent to PIAS should I wish to receive financial advisory or other related services from PIAS again in future.

Signature*

Date*

*denotes mandatory

For Internal Use:

Date of Receipt by DPU			
Name/ Signature of DPU Officer			
Updated Client Consent Portal?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Date of Completion: _____

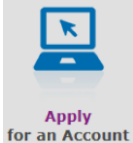

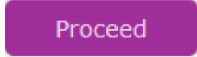
Annex 9: DNC Individual Account Guide


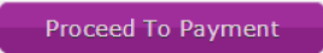
* For more information and illustrative guide, please refer to http://www.dnc.gov.sg/guide_organisation.pdf

A. Setting up a Individual Account

1)	Create an Individual Person account via the DNC Registry website at www.dnc.gov.sg , with your Singpass Each Singpass can only apply for one type of account. For example, the same Singpass cannot be used to create an account for 'Organisation registered in Singapore' and 'Individual Person'.
2)	Pay a one-time fee of \$30
3)	An activation link will be sent to the email provided
4)	Each main account will be given 500 free credits every year

B. Steps in setting up Individual Accounts

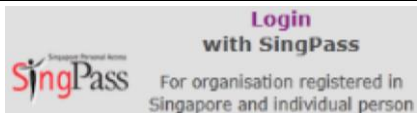
1)	Access the website – http://www.dnc.gov.sg via any browser
2)	 <p>To apply for an account, click on the “Apply for an Account” icon under the Organisation box. You will be directed to the Organisation Account Creation information page</p>
3)	<p>There are 3 types of account. Click on the drop down box to select “Individual Person” under account type</p> 
4)	Tick on the checkbox after reading the Terms and Conditions and click on the  button
5)	You will be redirected to Singpass login page. Upon successful login with your Singpass, you will be routed to the DNC details page
6)	Fill in the individuals details as requested

7)	As you are not checking on behalf of another organisation, click the  button in the On Behalf List page to go to the Account Creation Summary page
8)	The Account Creation Summary page shows the details that you have entered. Check the details and click on the  button to go to Select Payment Mode page. If there are any amendments, please click on the <Back> button to amend the details.
9)	In the Select Payment Mode page shown below, click on your preferred payment mode . You can either click on VISA, MasterCard, American Express, or Internet Banking . You will be then redirected to the ENets payment page.
10)	For VISA / MasterCard or American Express payment mode, you will need to enter your credit card details. For Internet Banking, you will need to provide your bank account information.
11.	Upon completion, you will be shown the Registration Confirmation page. An activation email will also be sent to your registered email once payment is successful.

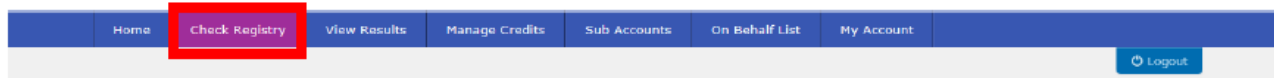
C. Purchasing credits

1)	Two types of credits available: (a) pre-paid or (b) pay-per-use *Pay-per-use carries a minimum charge of \$10
2)	Varying rates apply for both

D. Using the DNC Registry

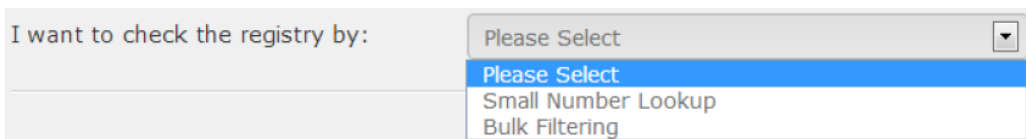
1)	Login to www.dnc.gov.sg using your Singpass
2)	 <p>If you are an Individual Person, click on “Login with Singpass” and you will be redirected to the SingPass page.</p>

2) Click on **Check Registry** at the navigation bar at the top of the screen to submit your numbers for checking.



2) Click on the drop down box to select the method of submission. Use either the:

- (a) **Small Number Lookup** (for 10 or less telephone numbers); or
- (b) **Bulk Filtering** (no limit on the number of telephone numbers that can be checked)

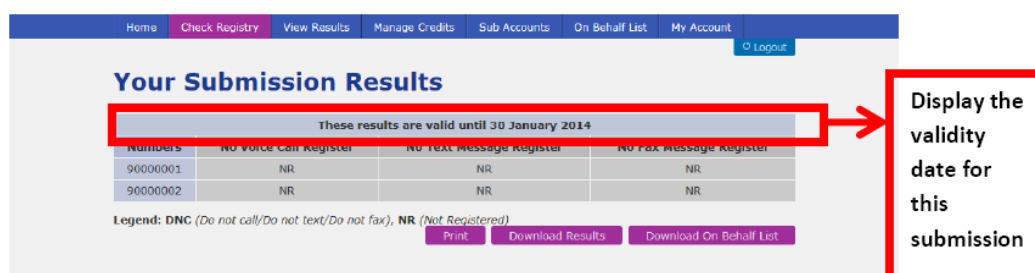


3) Ensure **sufficient credits** for check or purchase more credits

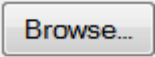
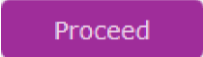
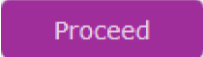
4a) i) For **Small Number Lookup**, key in telephone number/s and click on the **Proceed** button to go to the **Submission and Payment Summary** page.

ii) The **Submission and Payment Summary** page will display the total quantity of the telephone numbers submitted, the current credit balance, the credits to be deducted and the remaining credits. Click on the **Proceed** button to go to **Step 3: Your Submission Results** page or <Back> to go back to previous page.

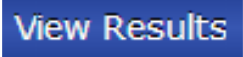
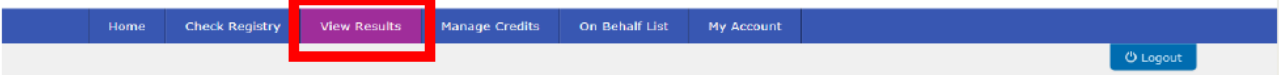
iii) If there are sufficient credits, you will be shown the **Your Submission Results** page below.



If there are insufficient credits, you will be redirected to a page to prompt you to pay via Pay Per Use or Pre-paid.

4b)	<p>i) For Bulk Filtering, upload the .CSV file (with a single column of telephone numbers that are exactly 8 digits and starting with 3, 6, 8 or 9).</p> <p>Note: You may use any editor (Microsoft Excel, Notepad, etc) to develop the .CSV file. Please remember to save as .CSV file format and no other format. Click on the  button to upload the file to the system.</p> <p>ii) Click on the  button to go to Submission and Payment Summary page.</p>
	<p>iii) Check the details on Submission and Payment Summary page and click on  button to go to Your Submission Results page.</p>
	<p>iv) If there are sufficient credits, the DNC Registry will proceed to check your numbers and you will be notified within 24 hours.</p> <p>If there are insufficient credits, you will be redirected to a page to prompt you to pay via Pay Per Use or Pre-paid.</p>

E. Collecting results

	Small Number Lookup	Bulk Filtering
1)	Results available immediately on portal	Results available within 24 hours . Notification via email will be sent to the account holder when the results are ready
2)	<p>Click on  at the navigation bar at the top of the screen. You can search for past results by specifying your search criteria.</p> 	
3)	<p>A copy of the results must be retained for your own reference, especially if at a future date there is a dispute as to whether you had checked the DNC Registry or whether a particular Singapore telephone number was registered or not.</p>	

Annex 10: Checklist for procedure prior to the sending of Marketing Messages

**The assumption here is that all requirements imposed by the 8 data protection principles are adhered to, in particular the consent and purpose data protection principles.*

- ☐ Determine if the message (voice call, SMS/MMS or fax) to be sent is to a Singapore telephone number.
- ☐ Find out if the individual has provided clear and unambiguous consent to receive such Marketing Message on his Singapore telephone number.
- ☐ Ensure that the individual's consent (if any) is evidenced in written or other form so as to be accessible for subsequent reference.
- ☐ Determine if the consent has since been withdrawn.

If there is such consent and the consent has not been withdrawn, you may proceed to send the Marketing Message. But only send via the method of communication that the individual has consented to. For example, if the individual has only consented to receiving Marketing Messages via SMS, you must only send the Marketing Message via SMS. You must not make a marketing voice call to him.

- ☐ Find out if the exemption at paragraphs **18 to 25** relating to marketing fax messages or marketing text messages applies.

Note that the exemption will not apply if the individual has opted out, withdrawn his consent or otherwise indicated that he does not wish to receive Marketing Messages.

- ☐ Check to see if the Singapore telephone number has been checked previously and if the present time is within the validity period for the results of the DNC registry check.
- ☐ Ensure that the Singapore telephone number has been checked against the relevant DNC Register within the prescribed period.
- ☐ Ensure that the Marketing Message contains clear and accurate information identifying the Organisation as well as how the recipient may contact the Organisation.
- ☐ Ensure that such information remains valid for at least 30 days after the receipt of the message.
- ☐ If the Marketing Message is a voice call, ensure that the calling line identity is not concealed.
- ☐ Ensure that all requirements for Marketing Messages as set out by regulations under the PDPA are complied with.
- ☐ Ensure that the Marketing Message is sent during the validity period of the results of the DNC Registry check.
- ☐ Monitor and be watchful for any communication by recipients indicating that they wish to cease receiving Marketing Messages and ensure that this withdrawal of consent is immediately communicated to the Data Protection Officer and acted upon.
- ☐ Ensure that any withdrawal of consent is immediately communicated to any third parties engaged to send Marketing Messages on behalf of the Organisation.
- ☐ Ensure that no Marketing Messages are sent to the individual (whether by the Organisation itself or by third parties engaged by the Organisation to send Marketing Messages on its behalf) after the stipulated period of time (please refer to paragraph **50** for the relevant time period).

Annex 11: Management of Non-Clients Consent Data

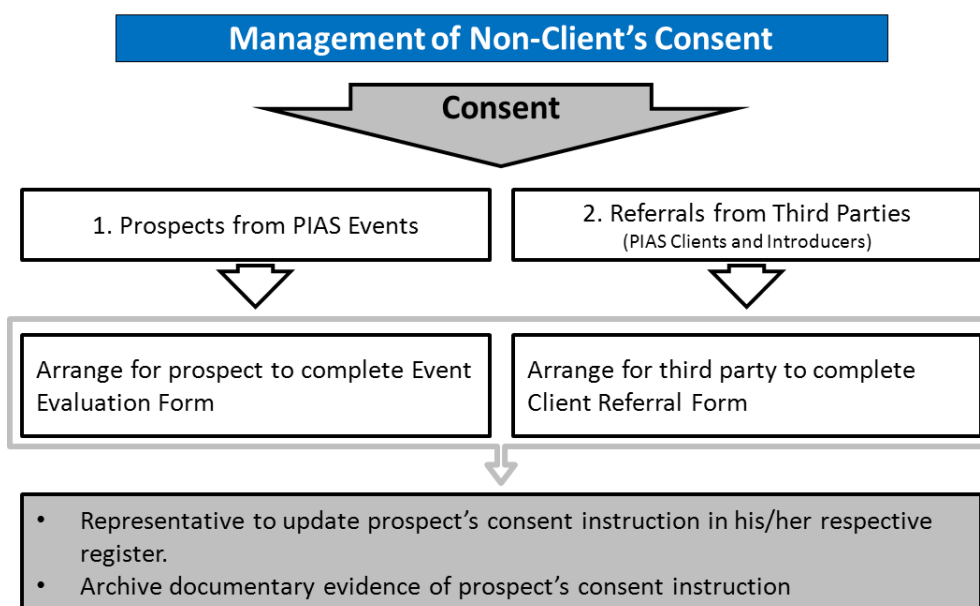
The interim PIAS Personal Data Protection Portal is not to capture non-PIAS client's consent data. Until when the IAgent system is available, such information of their own leads will be updated in registers maintained by each individual representative. Therefore, consent instructions of non-PIAS clients (prospects) should not be submitted to DPU as the system will not be able to capture the data.

With the above, it is a requirement that the register contains all the below information specified in the below table illustration.

Prospect Name	NRIC	CONSENT GIVEN					
		Voice Call Number(s) and Consent Date	Text Message Number(s) and Consent Date	Fax Number(s) and Consent Date			

Each representative is responsible of ensuring

- The accuracy and completeness of the data entered and
- Prompt updates in the register upon receiving the consent instructions.



Annex 12: Client Referral Form



PROFESSIONAL INVESTMENT ADVISORY SERVICES

Client Referral Form

For adviser to complete

P8 Code:

Note: This Form must be completed and signed by third party referrers/ introducers who are referring or introducing leads to PIAS.

I declare and warrant that the personal data of the individual/s that I am providing to PIAS below:

- (a) is legitimate;
- (b) consent has been obtained from him/ her for me to disclose his/ her personal data to PIAS and for PIAS to collect and use the data;
- (c) is indeed provided by the very individual stated below and the individual has been informed that PIAS will be contacting him/ her by way of voice call, SMS/MMS, facsimile and/ or email for marketing purposes; and
- (d) is accurate and provided with that very individual's consent.

Referrals by Clients to PIAS	Name	Mobile Number	Email Address

I undertake to indemnify and at all times to keep PIAS (together with its respective officers, employees and agents) (each an "Injured Party") indemnified against any and all losses, damages, actions, proceedings, costs, claims, demands, liabilities (including full legal costs on a solicitor and own client basis) which may be suffered or incurred by the Injured Party or asserted against the Injured Party by any person or entity whatsoever, in respect of any matter or event whatsoever arising out of, in the course of, by reason of or in respect of any breach of my declaration and warranty above.

Referrer/ Introducer's Signature

Full Name (as per NRIC/Passport) : _____

NRIC (Passport No. for foreigner) : _____

Name of Corporate Introducer* : _____

Date : _____

*Where applicable

For Internal Use:

Received by DPU	On	By
Date & Time:		DPU Officer/ Manager:

Annex 13: Consent to Refer Form

PIAS PROFESSIONAL INVESTMENT ADVISORY SERVICES	Consent to Refer Form
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NOTE: This form is to be completed by the PIAS client if you are referring him/ her to any PIAS Referral Service Partners (e.g. referring client to our referral service partner for mortgage loan) or any introducing activity is conducted.

For adviser to complete
P8 Code:

Please complete all the below fields.

Full Name (as per NRIC/Passport)	
NRIC (Passport No. for foreigner)	
Contact Number	
Name of Representative	
Name of Referral Service Partner	

- I understand, acknowledge and consent to the aforementioned representative from PIAS to collect, use and/ or disclose my personal data to the Referral Service Partner listed above (which may be located outside of Singapore).
- ☐ I consent to the Referral Service Partner to contact me by way of voice call, SMS/MMS and/ or facsimile for marketing purposes.
- I hereby represent and warrant that I am the user and/or subscriber of the telephone number(s) provided by me in this form, and that I have read and understood the above provisions.

Client's Signature _____

Date _____

For Internal Use:

Received by DPU	On	By
	Date & Time:	DPU Officer/ Manager: