

that disclosure will be made in digital form moving forward and enquire if such change in the form of disclosure is acceptable to the consumers. The FSP shall-

- a) give prior written notice of at least seven (7) calendar days to financial consumers before the change takes effect;
- b) in the written notice, indicate the benefits of opting for disclosure via digital means to enable financial consumers to opt-in for migration to digital disclosure; and
- c) clearly disclose the relevant fees in the event financial consumers request for a physical copy of the information.

S 11.19 A FSP shall ensure that in making a disclosure via a digital channel, it does not expose financial consumers to heightened security risks, such as phishing, scam, and identity theft.

S 11.20 When access to relevant financial product information is provided through a hyperlink on a FSP's digital channels, the FSP shall make it clear that financial consumers will not be asked to provide their personal details online in order to access the product information. This is to mitigate against the risk of phishing and financial scams. The FSP shall also ensure that the hyperlink is-

- a) prominent and easy to navigate;
- b) labelled appropriately to convey the relevance of information it leads to; and
- c) programmed to lead financial consumers directly to the relevant information on the click-through page.

S 11.21 A FSP shall ensure that any personal information including financial information communicated to financial consumers via a digital channel is adequately protected, such as by using password protection or encryption.

S 11.22 A FSP shall ensure that its website and other digital channels used to deliver product information are accessible to all financial consumers, consistent with the principles set out in the Policy Document on Fair Treatment of Financial Consumers.

S 11.23 A FSP that distributes its insurance and takaful products through non-direct digital platforms (NDDPs)¹¹ shall also comply with the disclosure requirements as specified under paragraph 1 in Schedule II.

G 11.24 For the avoidance of doubt, the requirements under paragraphs 11.7, 11.8, 11.17 and 11.20 do not apply to NDDPs.

12 Disclosure of customer information

S 12.1 A FSP intending to disclose customer information to other entities within the financial group or third parties such as strategic alliances for marketing and promotional purposes, shall obtain the prior written consent of financial consumers authorising such disclosure.

¹¹ Non-direct digital platforms include product aggregators and E-commerce platforms, but do not include any digital channel developed as the ITO's proprietary system or outsourced to third party vendors to administer on behalf of the ITO, whereby consumers purchase the product directly from the ITO.