MONTHLY DPO SUPPORT PACK · C8

Quarterly data protection report to management

Fictional organisation, illustrative only, not a client case study. Quillmarrow Supplies Pte. Ltd. (fictional) is invented. All people are shown by role only.

Organisation	Quillmarrow Supplies Pte. Ltd. (fictional)
Document	C8 · Quarterly data protection report to management
Version	1.0
Date	12 February 2027 (illustrative)
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Client approver (role)	Managing Director
Label	Fictional organisation, illustrative only, not a client case study

Prepared by the Head of Operations (DPO) with the reviewer's support on 9 February 2027 for the MD and COO meeting on 12 February 2027.

1. Summary for the MD

- At **31 January 2027**, eight review areas were Green, three were Amber and none were Red. The Amber areas were consent (G-02), retention (G-08) and transfers (G-09).
- Of the 15 actions in C2, eight were Closed, one was In progress, four were Open and two were Overdue. The overdue items were retention decisions for RS-02, RS-12 and RS-13 (DA-08) and the DV-01 addendum (DA-10).
- Eight requests or complaints were received. Seven were closed and responded to within Quillmarrow's response target in B7; one remained Open and within target at 31 January. One acknowledgement was late.
- There was one incident in the quarter, INC-2026-11. The MD and DPO recorded a separate decision that it was not notifiable. No PDPC notification was made.
- Ten policy or procedure changes were recorded. The January refresher was attended by 71 of 79 invited staff; the HR Manager owns catch-up for the eight absentees under DA-15.
- **Five decisions are needed** at the meeting: the three outstanding retention positions; the DV-01 addendum deadline and interim arrangement; the older showroom sign-ups; the conditional DV-04 pilot; and B11 v1.1.

The RAG and tracker figures in this report are a snapshot at 31 January. The decisions recorded after the meeting are shown separately in section 6 and do not change that snapshot.

2. RAG view by area

The ratings show progress against the B2 action plan. Green means the planned actions for that area are done and evidenced; it is not a statement that Quillmarrow is compliant. The handover view is from B2 at 30 October 2026. The current view is at 31 January 2027. Owners below identify the relevant role for follow-up; detailed action owners are in C2.

Area	At handover (30 Oct 2026)	Now (31 Jan 2027)	Why	Owner
G-01 Accountability	Amber	Green	DPO contact published; B5 approved; complaints process documented.	DPO
G-02 Consent	Amber	Amber	Pre-ticked box removed and showroom recording method live. About 600 older sign-ups remain suppressed pending a decision.	Head of Marketing; MD with DPO for DA-03

Area	At handover (30 Oct 2026)	Now (31 Jan 2027)	Why	Owner
G-03 Purpose limitation	Green/Amber	Green	CCTV purpose and access statement approved. Staff-related use requires DPO and HR Manager review.	DPO with HR Manager
G-04 Notification	Red	Green	Website, job-application, showroom and CCTV notices introduced.	DPO
G-05 Access and correction	Amber	Green	B7 adopted and log in use. DV-01 agreed to forward requests within one working day.	DPO
G-06 Accuracy	Green	Green	Sales verification evidence retained on 27 January 2027.	Sales Manager
G-07 Protection	Amber	Green	Customer-library link sharing restricted; ShopCloud admin MFA enabled; Harbour IT admin access reviewed.	IT Manager
G-08 Retention limitation	Red	Amber	B8 decisions approved except RS-02, RS-12 and RS-13; the first clean-up is in progress.	MD with DPO and Finance Director; Finance Director and Warehouse Manager for DA-09
G-09 Transfer limitation	Amber	Amber	ShopCloud hosting and backup locations confirmed; DV-01 addendum remained unsigned at the snapshot date.	COO for DA-10; IT Manager for DA-11
G-10 Data breach notification	Red	Green	B11 approved; incident and separate decision records in use; drill completed.	DPO
G-11 Do Not Call provisions	Amber	Green	B12 approved and campaign gate met; calls use contact sources S1 to S3 only, and the two uncleared sources (S4 and S5) stay excluded.	Head of Marketing

Late or revised items: The showroom consent method was due on 13 November 2026; the date was revised to 4 December, and it went live on 2 December. The remaining notices were due on 13 November, revised by the COO to 11 December, and completed on 9 December. ShopCloud admin MFA was completed on 19 November, after its 13 November target. The Harbour IT access review was completed on 22 January 2027 against a revised date of 31 January agreed by the COO.

3. Trends this quarter

Actions

C2 status at 31 January 2027	Count	Actions
Closed	8	DA-01, DA-02, DA-04, DA-05, DA-06, DA-07, DA-11, DA-12
In progress	1	DA-09
Open	4	DA-03, DA-13, DA-14, DA-15
Overdue	2	DA-08, DA-10
Total	**15**	**DA-01 to DA-15**

DA-03 is awaiting a decision; the other three Open items were on track at the snapshot date. DA-08 was due on 31 January and placed on the 12 February agenda. DA-10 missed its revised 31 January target and was escalated to the COO.

Requests and complaints

Month received	Count	Position at 31 January 2027
November 2026	3	AR-07 to AR-09 closed; each response was within the target.
December 2026	3	AR-10 to AR-12 closed; each response was within the target. AR-10 was a complaint.
January 2027	2	AR-13 closed within the response target, but acknowledged late. AR-14 remained Open and within target.

Month received	Count	Position at 31 January 2027
Total	**8**	**7 closed and responded to within target; 1 Open within target.**

AR-13 reached a sales shared mailbox on 5 January and was acknowledged on 12 January, five working days later, against a three-working-day target. Shared mailboxes now forward request-like emails to the DPO. AR-14 was due on 19 February 2027; no outcome after 31 January is recorded here. C3 holds the request-level detail.

Incidents, changes and training

Measure	Quarter position
Incidents	1: INC-2026-11. The MD and DPO decided it was not notifiable; no PDPC notification was made.
Policy and procedure changes	10 entries, PC-01 to PC-10, in C5.
December B15 briefing	74 of 80 attended. Five absentees completed the recording by 22 December; one was on long-term leave.
January C6 refresher	71 of 79 attended; eight were absent and are to catch up under DA-15.
Breach drill	One tabletop exercise on 21 January, recorded in C7.

For INC-2026-11, the recipient confirmed deletion on 10 December. The DPO completed the assessment on 11 December, and the MD and DPO recorded the decision separately that afternoon. The Sales Manager told the customer as a courtesy. DA-12, concerning the Finance team's external-recipient warning and delayed send, closed on 13 January.

The C7 scenario was **simulated and never happened**. The exercise identified the need for a calendar-day reminder, ShopCloud's incident contact and a deputy decision-maker, as well as clearer separation of assessment and decision.

4. Open risks

The ratings below reflect the relevant area's 31 January RAG where one is assigned. They are not separate legal or technical risk scores.

Risk	Ref	Rating	Owner	What would reduce it
Older showroom sign-ups lack consent records and could be used incorrectly if suppression is not maintained.	G-02; DA-03	Amber	MD with DPO; Head of Marketing for suppression	Keep them suppressed and carry out the MD's decision after lawyer advice.
Retention positions for orders, employee HR files, and payroll and CPF records were not yet approved at the snapshot date.	G-08; DA-08	Amber	MD with DPO and Finance Director	Decide using accountant and lawyer advice; update B8 and carry out approved clean-ups.
DV-01's addendum was unsigned despite the revised target. Malaysia fulfilment continues under interim minimisation.	G-09; DA-10	Amber	COO	Agree the addendum or bring alternatives to management; maintain interim minimisation.
A proposed vendor could receive access before its conditions and overseas-transfer safeguards are confirmed.	DV-04; DA-13	No separate RAG assigned	Head of Customer Service; DPO to confirm conditions	Complete the missing evidence and contract points, restrict access, keep AI suggestions off and update B3 and B9 before the pilot.
Staff who missed the refresher may not have received the session.	DA-15	No separate RAG assigned	HR Manager	Complete the recording and five-question check by 26 February.
The drill exposed gaps in B11 v1.0 that could delay a response or confuse its record.	C7; DA-14	No separate RAG assigned	DPO	Update B11 with the contact, deputy and calendar-day reminder; retain separate assessment and decision records.

5. Decisions needed

The recommendations below are for management's consideration at the meeting; they do not replace the decisions recorded in section 6. Legal points should be confirmed with a Singapore-qualified lawyer, and accounting or tax retention matters with Quillmarrow's accountant or lawyer.

1. **Retention positions — DA-08.**
   Options: Approve the accountant's and lawyer's positions for RS-02, RS-12 and RS-13, or seek clarification before approving them.
   DPO recommendation: Approve the positions if the MD is satisfied that the advice resolves the outstanding questions, then update B8. The actual periods are not reproduced in this report.
   Decision: MD, with the DPO and Finance Director supporting.

2. **DV-01 addendum — DA-10.**
   Options: If the addendum remains unsigned on 28 February, continue under interim minimisation with a further deadline; or minimise the Malaysia fulfilment data further and examine alternatives.
   DPO recommendation: Set a firm further deadline, retain the interim minimisation and ask the COO to bring alternatives if it is missed. Since 7 December 2026, customer email addresses have not been sent to DV-01; the shared data is limited to name, delivery address, phone and order lines.
   Decision: MD, with the COO responsible for follow-up.

3. **Older showroom sign-ups — DA-03.**
   Options: Delete the approximately 600 older sign-ups, or consider a single re-permission message after lawyer advice. They have been suppressed from all marketing since 16 December 2026.
   DPO recommendation: Delete the records rather than send a re-permission message, subject to the lawyer's advice and any other retention question. Keep suppression in place until deletion.
   Decision: MD with the DPO.

4. **DV-04 pilot — DA-13.**
   Options: Approve the planned 1 March pilot subject to completion of all conditions, or defer it until the conditions are confirmed.
   DPO recommendation: Proceed only if the missing evidence is received, the lawyer's contract points are agreed, AI reply suggestions remain off, access is limited to ticket and order-lookup roles, and B9 and B3 are updated. The DPO should confirm the conditions before the pilot starts. C4 contains the review.
   Decision: MD at this meeting. The DPO's conditional decision of 18 January and COO approval of 20 January remain subject to DA-13.

5. **B11 v1.1 — DA-14.**
   Options: Approve the revised plan with the COO as deputy decision-maker, ShopCloud's incident contact and a calendar-day reminder; or return it for revision.
   DPO recommendation: Approve the revision, while retaining separate assessment and decision records.
   Decision: MD.

6. Decisions recorded on 12 February 2027

Added after the meeting by the DPO

Decision	Decided by	Date	Tracker ref
Approved the accountant's and lawyer's positions for RS-02, RS-12 and RS-13; requested B8 v1.2 by 28 February 2027.	MD	12 February 2027	DA-08
Gave DV-01 until 31 March 2027 under interim minimisation; the COO will bring alternatives after that date.	MD	12 February 2027	DA-10
Directed deletion of the older showroom sign-ups by 31 March 2027; no re-permission message.	MD	12 February 2027	DA-03
Approved the DV-04 pilot subject to DA-13; the DPO is to confirm that conditions are met before 1 March 2027.	MD	12 February 2027	DA-13
Approved B11 v1.1.	MD	12 February 2027	DA-14

These are decisions, not evidence that the associated clean-up, addendum or pilot conditions have been completed. C2 should continue to show the relevant follow-up.

7. Next quarter: February to April 2027

- **B8 and clean-ups:** update B8 to v1.2 by 28 February following the MD's decision. Continue DA-09: RS-04 disposal was recorded on 25 January; RS-10 visitor-log clean-up is due by 28 February.
- **DV-01:** maintain interim minimisation and pursue the addendum to the MD's 31 March deadline. The COO will bring alternatives after that date.
- **Older showroom sign-ups:** retain marketing suppression and carry out the MD's deletion decision by 31 March. Do not send a re-permission message.
- **DV-04:** the Head of Customer Service owns DA-13, due 28 February. The DPO must confirm the conditions before the planned 1 March start. If the pilot starts, conduct the planned check after 30 days.
- **Staff refresher:** the HR Manager follows up the eight absentees' recorded session and check by 26 February under DA-15.
- **Planning:** plan the policy annual review and prepare for the next breach drill in July 2027.

The monthly check-in for January was held on **5 February 2027**. The following check-ins are planned for **5 March** and **2 April 2027**.

8. Sign-off

Report owner: Head of Operations (DPO), who approved it for issue on 9 February 2027

Received by: Managing Director and COO, 12 February 2027

Decisions made by: Managing Director, 12 February 2027, recorded by the DPO in section 6

Prepared with support from: the reviewer, who is not Quillmarrow's DPO

About this sample

Fictional organisation, illustrative only, not a client case study. Quillmarrow Supplies Pte. Ltd., its people, vendors, findings and dates are invented. Nothing in this document reports a client result.

I personally review and sign off every deliverable. You appoint your own DPO. I support them.

This is practical compliance support, not legal advice. For legal advice, use a Singapore-qualified lawyer.

What's not included

- Acting as, being named as or replacing your DPO.
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- Certification or a guarantee of compliance.
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- Forensic investigation, penetration testing, security engineering or administering your systems.
- Holding your customer database or making changes to live systems.
- Rebuilding the whole PDPA programme, a new AI governance review or a major new project (these need a separate scope and quote).
- Healthcare-sector work or on-site delivery.

Questions about this sample: DM @alewyl1 on X, or ask for a free intro call (coffee chat).