PDPA PROGRAMME PACK · B0

PDPA programme pack: cover and decisions

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	B0 · PDPA programme pack: cover and decisions
Version	1.0
Date	30 October 2026 (illustrative)
Prepared by	Alex Lew, reviewer and sign-off
Client approver (role)	Managing Director
Label	Fictional organisation, illustrative only, not a client case study

Why this programme was commissioned

Quillmarrow Supplies Pte. Ltd. (fictional) is an office-supplies distributor with about 80 staff, a Singapore showroom and warehouse, a web shop for individuals and trade accounts for businesses. Malaysia orders are fulfilled by a partner in Johor. Four things made the programme urgent. An enterprise customer's supplier questionnaire asked for a privacy policy, a breach plan and a retention schedule that Quillmarrow did not have. A SharePoint folder of customer returns data was shared with "anyone with the link" for two days in September (INC-2026-07). Marketing planned a telemarketing campaign to SME owners with no Do Not Call (DNC) checks. And the Head of Operations had just been appointed Data Protection Officer (DPO) and needed a working programme to own.

The programme ran remotely over about three to four weeks: interviews with role holders, document review and system walk-throughs using descriptions and masked screenshots. No customer database was received and no client personal data was put into AI tools.

Decisions this supports

- What personal data Quillmarrow needs, why it needs it and where it goes.
- Which gaps need attention first and who owns the action.
- What staff should do when someone withdraws consent, asks for access or correction, or raises a complaint.
- What to check before appointing a vendor or transferring data overseas.
- How the team escalates a suspected breach and records its decisions.
- What management and the appointed DPO need to approve and maintain.

Where each decision is answered

Decision	Answered in	Decided by (role)
What data, why and where it goes	B3 inventory and data flow map; B8 retention schedule	DPO; MD confirms retention decisions
Which gaps first, and who owns them	B2 gap review and action plan	MD
Withdrawal, access, correction and complaints	B6 consent and withdrawal; B7 access and correction; B5 policy (complaints)	DPO
Vendors and overseas transfers	B9 vendor checklist; B10 transfer checklist	COO with the DPO
Suspected breaches	B11 breach management plan	MD and DPO (notification decision)
What to approve and maintain	B5 policy; B16 DPO handover pack	MD; DPO maintains

The pack at a glance

Measure	What the pack records
Review areas	11 (G-01 to G-11): 3 Red (Notification, Retention limitation, Data breach notification), 7 Amber, 1 Green
Personal data records	25 in the inventory (PD-01 to PD-25), with systems, access, vendors and overseas flows
Retention decisions	20 record types (RS-01 to RS-20); periods set by law are flagged for the accountant or lawyer
Access and correction requests	6 sample requests logged (AR-01 to AR-06), including one late and one open
Vendor questions	18 questions to 3 fictional vendors and data intermediaries, with gaps left visible
Breach exercise	INC-2026-07 worked through C.A.R.E.: assessed on 16 September, recorded as not notifiable, with the deadline that would have applied

These are counts of what the sample documents contain. They are not results or outcomes.

What is in this pack

ID	Document	Client approver (role)
B0	Pack cover and decisions (this document)	Managing Director
B1	Programme scope sheet	Chief Operating Officer
B2	Gap review and action plan (with tracker workbook)	Managing Director
B3	Personal data inventory and data flow map (with workbook)	DPO
B4	Privacy notices	DPO
B5	Internal data protection policy	Managing Director
B6	Consent and withdrawal procedures	DPO
B7	Access and correction procedure and log (with workbook)	DPO
B8	Retention schedule (with workbook)	DPO; MD confirms decisions
B9	Vendor and data intermediary checklist (with workbook)	Chief Operating Officer
B10	Overseas transfer checklist	DPO
B11	Data breach management plan	Managing Director
B12	DNC checklist and process	Head of Marketing
B13	DPIA template, with a worked example	DPO
B14	Basic AI-use policy	Managing Director
B15	Remote staff briefing: outline and speaker notes	DPO
B16	DPO handover pack	Managing Director

How to read this pack

1. Start with the **gap review (B2)**: the summary, the three Red areas and the action plan with owners and dates.
2. Read the **breach management plan (B11)** next. It is the most urgent gap and shows the INC-2026-07 assessment and decision log.
3. Use the **inventory (B3)** as the reference for every other document: notices, retention, vendors and transfers all point back to its PD IDs.
4. Give staff the **policy (B5)**, the **briefing (B15)** and the **AI-use policy (B14)** once the MD approves them.
5. The DPO keeps the programme running from the **handover pack (B16)**.

The breach rule used throughout

A breach is notifiable if it is likely to cause significant harm to the people affected, or affects 500 or more people. Quillmarrow assesses a suspected breach quickly; PDPC guidance expects the assessment within 30 calendar days. If a breach is notifiable, Quillmarrow tells the PDPC as soon as practicable and no later than 3 calendar days after assessing that it is notifiable. Where significant harm is likely, it tells the affected people as soon as practicable, on or after notifying the PDPC. A data intermediary tells Quillmarrow without undue delay. The assessment and the decision to notify are recorded separately. The public explanation is at alexlew.live/faq.html#faq-breach-deadlines.

Approvals and status

Item	Client approver (role)	Status in this sample
B1 scope sheet	Chief Operating Officer	Agreed before fieldwork
B2, B5, B11, B14, B16	Managing Director	Issued for approval
B3, B4, B6, B7, B8, B10, B13, B15	DPO (Head of Operations)	Issued for approval
B9 vendor checklist	Chief Operating Officer	Issued; vendor follow-ups open
B12 DNC process	Head of Marketing	Issued; no calls until the process is in use

The reviewer signs off each deliverable before issue. Quillmarrow's management makes the decisions and the appointed DPO owns the programme after handover.

Limits of this pack

- Facts are client-reported unless a document records the evidence seen.
- Questions that need a legal view, such as the basis for a particular use of data, contract wording or periods set by law, are flagged for a Singapore-qualified lawyer or accountant and are not answered here.
- No forensic investigation, penetration testing or changes to live systems were done.
- Missing evidence is listed, owned and dated in B2 rather than assumed.

After the programme

- **Owner.** The DPO owns the inventory, the action plan and the maintenance checklist in B16.
- **Re-review triggers.** A new system, vendor, collection point, overseas flow or marketing channel, a breach or near-miss, or a change in PDPC guidance.
- **Cadence.** The DPO reports progress on B2 actions to the MD monthly until all Red items close, then reviews the programme annually.

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 your DPO. You appoint your own DPO; I prepare the handover and can support them separately.
- Legal advice, legal contract drafting, representation or a guarantee of compliance.
- Forensic investigation, penetration testing, security engineering or implementing changes in live systems.
- A detailed AI governance review or ISO/IEC 42001 readiness check unless separately scoped.
- Ongoing document upkeep after handover, unless agreed through monthly DPO support.
- Healthcare-sector work or on-site delivery.

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