PDPA PROGRAMME PACK · B12

DNC checklist and process

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	B12 · DNC checklist and process
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Client approver (role)	Head of Marketing
Label	Fictional organisation, illustrative only, not a client case study

1. When the DNC provisions apply

This procedure is for Quillmarrow's planned telemarketing campaign to SME owners, using the prospect list in **PD-10**. It supports the action on **G-11**: no register-check process was reported and sender details were not standardised.

The Do Not Call (DNC) provisions concern specified messages sent to Singapore telephone numbers. Relevant channels can include voice calls, SMS, messaging apps and fax. The content, recipient, number and channel matter; staff should not assume a message is outside the rules simply because it concerns a business.

Some B2B messages and other situations may be treated differently. Clear and unambiguous consent in evidential form may also be relevant. The Head of Marketing and the DPO should confirm how the rules and any proposed exception apply to each campaign with a Singapore-qualified lawyer. Do not assume that a business relationship, a publicly available number or an old list establishes consent.

Use this procedure with B6 for consent and withdrawal, B3 for the data inventory and B8 for retention. Refer to the **PDPC Advisory Guidelines on the Do Not Call Provisions** and confirm legal questions with a lawyer.

2. Pre-campaign checklist

The Head of Marketing should complete and document the checklist before any batch is released. A proposed control is not evidence that it has been carried out.

Check	How	Owner role	Record kept
Campaign purpose and channels	Describe the offer, audience, message and intended channels. Ask the DPO to review whether the message is a specified message and whether any exception is proposed.	Head of Marketing	Campaign brief, message drafts and DPO review
List sources	Identify each source of PD-10 numbers, how it was collected and who supplied it. Keep sources distinguishable until review is complete.	Head of Marketing	Source list, collection details and unresolved questions
Consent evidence	Where consent is relied on, locate clear and unambiguous consent in evidential form for the relevant message and channel. Check wording, source and withdrawal status.	Head of Marketing	Consent record, wording version, source and evidence location; mark missing evidence as missing
DNC register check	Check the relevant numbers against the applicable registers **within the validity period set by the PDPC (confirm the current period)**, unless a proposed exception has been reviewed and confirmed with a lawyer. Exclude numbers that should not be contacted.	Head of Marketing	Check date, channels, batch reference, result and exclusions

Check	How	Owner role	Record kept
Sender identification	Include Quillmarrow's identification and contact details in each message. Review the wording for the particular channel with the DPO and confirm requirements with a lawyer.	Head of Marketing	Approved message or call script and version
Calling line identity	For voice calls, ensure the calling line identity is not concealed. Test the intended calling arrangement before release.	Sales Manager	Test date, outcome and calling arrangement
Opt-outs and withdrawals	Provide an appropriate way for recipients to opt out; record and action requests promptly under B6. Apply suppression before each batch and communicate changes to any calling provider. Confirm channel-specific requirements with a lawyer.	Head of Marketing	Suppression list reference, request date, action and provider confirmation where relevant
Campaign release	Reconcile the approved audience with DNC results, consent evidence and suppressions. Hold unresolved sources or numbers; obtain DPO review before release.	Head of Marketing	Final batch reference, exclusions, approval and release decision

The checklist should be repeated for a later batch if the facts or relevant check status have changed. Do not treat a check for one channel as automatically covering another.

3. Campaign record fields

The Head of Marketing should keep a record for each campaign and batch, with access limited to staff who need it. Include:

- Campaign and batch reference, purpose, proposed message and channels.
- List sources, collection methods and the person or role responsible for each source.
- Number-list or file reference and secure evidence location; avoid copying the full prospect list into the decision record.
- Consent wording and evidence references where consent is relied on, including any gaps or withdrawals.
- DNC check date, relevant registers or channels checked, results, exclusions and evidence location.
- Suppression check, opt-out contact route and any instructions sent to a calling provider.
- Approved sender identification, contact details and message or script version.
- Voice calling-line identity test and outcome, where applicable.
- DPO or legal review, decision, owner, release date and any conditions or unresolved actions.

Keep DNC check records under **RS-08** and marketing and consent records under **RS-07**, subject to Quillmarrow's confirmed B8 decisions. Do not invent a retention period. Preserve enough evidence to reconstruct the decision without keeping unnecessary copies of personal data.

4. Worked example: Q4 SME owners campaign

This example illustrates one proposed batch; it is not evidence that the campaign was run or that checks occurred.

The Head of Marketing has identified **five illustrative list sources** for PD-10. Consent evidence is available for three and missing for **two of the five**:

Source	Where the numbers came from	Consent evidence	Decision for this batch
S1	Showroom sign-up cards with the new unticked choice (PD-09, after the B6 change)	Yes: signed card and wording version	Eligible after DNC check
S2	Web-shop customers who ticked the marketing choice (PD-08)	Yes: system record and wording version	Eligible after DNC check
S3	Trade-fair enquiry forms, 2026, with a separate call consent line	Yes: forms scanned	Eligible after DNC check
S4	Older showroom sign-ups before the B6 change	Missing	**Hold**: not called; DPO and lawyer review
S5	B2B contacts from the 2025 account form with the pre-ticked box (PD-04)	Missing: pre-ticked box is not a clear choice	**Hold**: not called; re-ask through B6 before any use

Check for the example batch	Illustrative completion or action
Purpose and channel	Record the proposed SME offer and whether the batch uses voice calls, SMS or another channel. DPO review remains needed before release.
Source and consent review	Record all five sources separately. Review the wording and channel coverage for the three sources with evidence. Hold the two sources with missing evidence; do not reconstruct consent as fact.
DNC check	Check eligible numbers against the relevant registers within the validity period set by the PDPC (confirm the current period). Record the batch reference and exclusions.
Message and identity	Prepare the message or script with Quillmarrow's identification and contact details. For voice calls, test that the calling line identity is not concealed.
Opt-outs	Apply the current suppression list and confirm who will process new opt-outs and inform any provider.
Release decision	The Head of Marketing and DPO review the evidence and exclusions. Release only an eligible, approved batch; the two missing-evidence sources remain on hold pending review and legal advice.

Consent evidence from the other sources is not, by itself, proof that every intended contact may proceed. The DPO should review the proposed basis, register checks and exceptions with a lawyer where needed.

5. Owner roles and monthly check

The **Head of Marketing** owns the campaign record, list sources, consent evidence and suppression process. The **Sales Manager** owns the voice-call script and calling-line test. The **DPO** reviews questions about applicability, exceptions and unresolved evidence, and coordinates legal advice.

The DPO should conduct a **monthly sample check** of campaign records, register-check evidence, message versions and opt-out handling. Record findings, corrective actions, owner and target date in B2 under G-11.

By **13 November 2026** (G-11 target in B2), the Head of Marketing should prepare the register-check procedure, standard sender details and campaign record for DPO review. The campaign should not be treated as ready merely because this checklist exists.

6. Go or no-go gate

The campaign starts only when the Head of Marketing can show the DPO all of the following. If any one is missing, the answer is no-go and the gap stays open in B2 under G-11.

Gate item	Evidence	Owner role
Every number traced to a source (S1 to S5)	Source list	Head of Marketing
Held sources removed from the batch	Batch file reference and count removed	Head of Marketing
DNC check done within the valid period	Check date and exclusions record	Head of Marketing
Standard sender details in the script	Approved script version	Sales Manager
Calling line identity tested	Test record	Sales Manager
Opt-out route working and suppression list applied	B6 test record	Head of Marketing
DPO sign-off	Dated note in the campaign record	Head of Operations, appointed DPO

7. Next actions

Action	Owner role	Evidence	Target
Confirm with a lawyer which messages in the campaign are specified messages and whether any exception applies	Head of Operations, appointed DPO	Written advice on file	13 November 2026
Build the S1 to S5 source list and remove S4 and S5 from the first batch	Head of Marketing	Source list and batch file	13 November 2026

Action	Owner role	Evidence	Target
Approve the standard sender details and call script	Sales Manager, with DPO	Approved script version	13 November 2026
Run and file the first DNC check	Head of Marketing	Check record and exclusions	Before the first call
First monthly sample check	Head of Operations, appointed DPO	Findings logged in B2 under G-11	One month after the first batch

This checklist is practical support, not legal advice.

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).