

TRANSFER IMPACT ASSESSMENT

Transfer of Personal Data from Malaysia to Singapore

Pursuant to Section 129 of the PDPA 2010 (as amended 2024)
and the Cross-Border Personal Data Transfer Guidelines (29 April 2025)

Item	Details
Conducted by	YBServe Solutions (SSM: 202603018067)
Date of Assessment	26 February 2026
Valid Until	26 February 2029 (3 years per CBPDT Guidelines)
Version	1.0
Classification	Internal - Available to Customers upon request

1. PURPOSE

This TIA is conducted per Section 129 of the PDPA (as amended) and the Cross-Border Personal Data Transfer Guidelines (29 April 2025) to assess whether Singapore has in force a law substantially similar to the PDPA or ensures adequate protection.

2. DETAILS OF THE TRANSFER

Item	Details
Data Controller	Each YBServe Customer (elected representative's office)
Data Processor	YBServe Solutions (SSM: 202603018067)
Receiver	Supabase Inc. (Sub-processor)
Location	Singapore (AWS ap-southeast-1)
Personal Data	Full names, IC numbers, emails, phones, addresses, electoral data, interaction descriptions, photos, chat messages, sent messages, etc.
Data Subjects	Citizens/constituents, staff/authorised users
Purpose	Database hosting, authentication, file storage
Legal Basis	S.129(2)(a) Substantially similar law + S.129(3)(a) Consent
Frequency	Continuous (real-time)

3. ASSESSMENT OF SINGAPORE'S DATA PROTECTION FRAMEWORK

3.1 Applicable Law

Singapore's **Personal Data Protection Act 2012** (No. 26 of 2012), significantly amended by the **Amendment Act 2020** (effective 1 February 2021).

3.2 Comparison

Factor	Malaysia PDPA	Singapore PDPA	Assessment
Scope	Commercial transactions; automatic processing	All organisations; electronic + non-electronic	Comparable. Singapore broader.
Consent	Required; must be informed	Required; informed; legitimate interests exception	Comparable.
Security	Security Principle requires practical steps	Protection obligation requires reasonable arrangements	Comparable.
Breach notification	Mandatory 72h to Commissioner (since June 2025)	Mandatory 3 days to PDPC (since Feb 2021)	Comparable. Both mandatory.
Cross-border	Restricted unless adequate protection or consent	Restricted unless comparable protection	Comparable.
Data subject rights	Access, correction, withdrawal, portability (since June 2025)	Access, correction, withdrawal, portability (since Feb 2021)	Comparable.
Enforcement	JPDP Commissioner	PDPC Commission	Both independent regulators.
Penalties	Up to RM 1M and/or 3 years	Up to S\$1M or 10% turnover	Singapore potentially higher.

Factor	Malaysia PDPA	Singapore PDPA	Assessment
DPO	Mandatory for certain orgs (June 2025)	Mandatory for all orgs (2021)	Singapore stricter.

3.3 International Recognition

- Signatory to APEC Cross-Border Privacy Rules (CBPR);
- Participant in ASEAN Framework on Digital Data Governance;
- Recognised as among the strongest data protection frameworks in Asia-Pacific.

4. ASSESSMENT OF RECEIVER (SUPABASE INC.)

Infrastructure hosted on AWS with **SOC 2 Type II, ISO 27001, ISO 27017, ISO 27018** certifications. Technical measures include AES-256 encryption at rest, TLS 1.2+ in transit, RLS for tenant isolation, automated PITR backups, network isolation, and DDoS protection.

Contractual safeguards include: processing limited to specified purposes, prohibition on using data for Supabase's own purposes, security obligations, breach notification, and data deletion upon termination.

5. RISK ASSESSMENT

Risk Factor	Assessment	Mitigation
Legal framework	LOW - Singapore PDPA substantially similar	Monitor law changes
Regulatory enforcement	LOW - PDPC active and established	N/A
Government access	LOW - Established legal processes	Encryption at rest
Receiver security	LOW - SOC 2, ISO 27001 certified	RLS, encryption, access controls
Onward transfers	MEDIUM - Supabase may use sub-processors	Contractual restrictions

6. CONCLUSION

Based on this assessment, Singapore has in force a law -- the Personal Data Protection Act 2012 (as amended) -- that is **substantially similar** to Malaysia's PDPA. Singapore ensures an **adequate level of protection** equivalent to the PDPA.

The transfer of Personal Data to Singapore (Supabase Inc., AWS ap-southeast-1) is **permissible under Section 129(2) of the PDPA**. Data Subject consent (Section 129(3)(a)) is obtained as a supplementary basis via the privacy consent checkbox.

7. REVIEW

- Within **3 years** (by 26 February 2029) per CBPDT Guidelines;
- Sooner if material changes to Singapore's data protection laws;
- Sooner if changes to Supabase infrastructure or security;
- Sooner if YBServe migrates database to a different jurisdiction.

Assessed by:

Razif, Founder & CEO, YBServe Solutions

Date: 26 February 2026

Next Review Due: 26 February 2029

-- END OF ASSESSMENT --