

Singapore Tourism Board's Data Trust Charter

Introduction

Singapore Tourism Board ("STB") has drawn up the Data Trust Charter ("Charter") to support data sharing between STB and our industry stakeholders in the private sector ("Industry Stakeholders"). This Charter represents our public commitment to secure and responsible data sharing and usage of the data shared with us by Industry Stakeholders joining us for the Singapore Tourism Analytics Network ("Stan") as our data partners ("Data Partners") and the protection of the privacy of personal data in that data sharing and usage. This public commitment mirrors the relevant data-related laws, guidelines and directions that govern STB's conduct, including the Statutory Bodies and Government Companies (Protection of Secrecy) Act ("Protection of Secrecy Act"), the Public Sector (Governance) Act 2018 and the Government Instruction Manual. Equally, this Charter describes the commitment we expect from our Data Partners.

What is Data?

In this Charter, "Data" refers to all information shared in any medium by our Data Partners under Stan, including but not limited to commercial data of Data Partners, content and information shared with us by Data Partners, personal data obtained through sites and systems of Data Partners, and data generated through surveys and research of Data Partners.

Why does STB collect, use or share the Data?

STB champions the development of Singapore's tourism sector, one of the country's key service sectors and economic pillars, and undertakes the marketing and promotion of Singapore as a tourism destination. While STB's mandate is to drive tourism development, we cannot achieve success without cooperation from our Industry Stakeholders. Continued support from our Industry Stakeholders is crucial in ensuring the success and sustainable growth of the sector.

In the face of growing challenges such as resource scarcity and increasingly discerning travellers, there is a need to focus on yield-driven quality growth. STB's approach is to leverage data analytics to drive strategic outcomes and aims to facilitate the sharing of data and resources among Industry Stakeholders. This would raise industry capability and competitiveness, encourage data-driven business decisions and forge long-term win-win partnerships.

STB's principles governing the Data Trust Charter

STB holds in the highest regard all the following principles to ensure that the Data sharing environment between STB and Data Partners, and between Data Partners is healthy and beneficial:

- (1) **Impartiality:** STB is a neutral and impartial third party user and facilitator of tourism-related Data, and has a primary mandate to holistically develop the tourism sector.
- (2) **Common tourism outcome:** STB is driven to act in a way that is beneficial for the tourism sector and tourism Industry Stakeholders in Singapore through continually seeking to achieve positive tourism outcomes and to raise industry capabilities.

(3) Confidentiality: STB upholds and respects commercially sensitive information, personal data and confidential information of our Industry Stakeholders, and has appropriate policies and processes to protect such data.

(4) Protection: STB accords the same level of prioritisation of protection to the data of our Industry Stakeholders to our own, so as to better avert illicit or accidental alteration or loss, and to better avoid unauthorised access, use or disclosure.

(5) Privacy: STB recognises and respects the rights of individuals to their privacy in any data shared, and has appropriate policies and processes to govern the collection, usage, access and disclosure of personal data collected by, on behalf of or shared with STB.

STB is committed to enshrining these principles and the contents of this Charter by incorporating these in Data Sharing Agreements with our Data Partners for Stan and in data processing contracts with our service providers.

STB's commitment to our Data Partners

We are committed to bind ourselves to our Data Partners through Data Sharing Agreements encompassing the following subject matter:

(1) Data Usage and Transparency

STB collects Data from you to fulfill its functions pursuant to legislation under its purview. In particular, the STB's functions under the Singapore Tourism Board Act are to develop and promote Singapore as a travel and tourist destination, to advise the Government on matters relating to travel and tourism, to enhance the travel and tourism sector's contribution to the Singapore economy, and to exercise licensing and regulatory functions under STB's legislated purview. For any use other than (i) these functions, (ii) allowed under this Charter or (iii) required under law, STB will seek your prior written consent.

(2) Data Confidentiality and Sharing

STB respects the commercial sensitivity of your Data and we will take reasonable measures to ensure that your specific Data remains confidential. We will not disclose the specific Data provided by a Data Partner to any other Industry Stakeholder without your prior written consent. If and when such consent is given, we will seek to ensure that it will be on terms similar to this Charter. Any industry benchmarks and insights shared by STB will be done at an aggregated and anonymised level to ensure that the Data provided by each Data Partner will be neither identifiable nor directly attributable. Additionally, STB will adhere to the following Data sharing guidelines:

- Aggregated benchmarks and insights that are derived from fewer than five individual Data Partners will not be shared.
- No benchmark or insight will be shared where the contribution of any one Data Partner exceeds 50% of the aggregated data.

(3) Data Protection

STB will take reasonable measures to ensure the security of the Data you have shared with us, STB has an ICT Security Policy, dictated by the Government Instruction Manual and the Public Sector (Governance) Act 2018, which encompasses all of the following:

- Maintenance of the confidentiality, integrity and availability of STB information assets holding the Data shared.
- Requirements on all STB personnel as to their respective responsibilities on maintaining the security and privacy of the Data shared.
- Administration of access control on all systems and applications holding the Data shared.
- Scenario planning and processes to prevent and respond to a variety of threats to STB information assets holding the Data shared, including unauthorised access, disclosure, modification, destruction, loss, misuse, manipulation of information assets and denial of services.

(4) Data Accuracy and Relevance

STB will take reasonable measures to ensure Data we collect, compile and subsequently share with you as industry benchmarks and insights is complete and accurate. STB may make modifications and/or extrapolations to the Data shared prior to its compilation for the purpose of quality controls and analytics.

(5) Personal Data Privacy

STB will take reasonable measures to ensure that the privacy of individuals will not be compromised through sharing Data with us. STB has a Personal Data Protection Policy, consistent with the Personal Data Protection Act 2012 and dictated by the Government Instruction Manual and the Public Sector (Governance) Act 2018, which encompasses all of the following:

- Requirements on all STB personnel as to their respective responsibilities to protect personal data.
- Requirements for the collection, use, access, retention, disclosure and disposal of personal data.
- Safeguards and processes to protect any personal data collected by or shared with us against illicit or accidental alteration or loss, and unauthorised access, use or disclosure.
- Processes to allow individuals to access, modify and delete their personal data.
- General prohibition against unauthorised re-identification of a person from anonymised data shared.

(6) Modification and Withdrawal

Each Data Partner shall have the right to request modification or withdrawal of the Data that has been provided to STB, subject to reasonable justifications. In order to maintain the integrity of the data sharing platform, any request for the modification or withdrawal of the Data you have provided to STB will be subject to mutual agreement.

Commitment from our Data Partners

STB believes that for Data sharing to be of value and mutually beneficial to all parties involved, Data Partners should, equally, commit to enshrining similar principles in Data Sharing Agreements with STB. Hence, this Charter illustrates the commitment sought from our Data Partners.

(1) Data Quality and Format

Each Data Partner will take reasonable measures to ensure that the Data they provide to STB is complete and accurate, and shared in such form and manner as STB may reasonably require.

(2) Frequency of Data Sharing

Each Data Partner will agree in conjunction with STB on a suitable frequency of Data sharing and take reasonable measures to ensure that the Data is shared in a timely manner in line with the agreed frequency.

(3) Variety of Data

Each Data Partner should consider the different types of data collected and agree in conjunction with STB on the types of Data to be shared. Each Data Partner should provide as great a variety of Data as possible to be harnessed and brought together to achieve deeper insights and value for the industry.

(4) Volume of Data Shared

Each Data Partner will agree in conjunction with STB on the volume of Data to be shared. Each Data Partner should provide as much Data as possible, so as to enhance the comprehensiveness and relevance of the insights that can be generated for mutual benefit.

(5) Data Granularity

Each Data Partner will agree in conjunction with STB on the granularity of the Data to be shared. Each Data Partner should provide Data that is as granular as reasonably possible so as to enhance the usefulness of the insights generated.

Data sharing within the whole of Singapore Government

We will comply with all relevant Singapore legislation, Government guidelines, regulatory directions and other requirements of a similar nature. In doing so, STB may share Data with other public sector bodies, including but not limited to the sharing of Data under directions of the Public Sector (Governance) Act 2018.

Consequently, STB shall have the right to vary this Charter for reasons including, but not limited to, complying with whole-of-government requirements, or from time to time adapting to policy demands on data-sharing. In the event of any such variation, STB will notify all affected Data Partners of the variation.

Contact

For any questions or feedback concerning Singapore Tourism Board's Data Trust Charter, please contact stb_feedback@stb.gov.sg.

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