

BCA BC BMSC/CIR/2025/1

Building Plan & Management Group

10 Dec 2025

Management Corporation  
Chairperson/ Secretary/ Council Members



Dear Sir/Madam

**HANDLING REQUESTS TO ACCESS PERSONAL DATA HELD BY MANAGEMENT CORPORATION STRATA-TITLED DEVELOPMENTS**

- 1 This circular clarifies the requirements which apply to requests made for personal data in records and documents maintained by and within the control of Management Corporations of Strata-Titled developments (“MCSTs”).
- 2 MCSTs must adhere to the provisions of both the Building (Strata Management) Act 2004 (“B(SM)A”) and the Personal Data Protection Act 2012 (“PDPA”) when handling personal data:
  - a. A subsidiary proprietor or a prospective purchaser, or their authorised representatives can apply for any record or document of an MCST under section 47(1)(b)(viii) of the B(SM)A. MCSTs should note not to disclose personal data beyond what is necessary for the purpose it is being used for.
  - b. MCSTs must appoint a data protection officer (DPO) and make the DPO's business contact information publicly available. DPOs may register with the PDPC via <https://go.gov.sg/registerdpoinfo>. DPOs play a vital role in ensuring compliance with the PDPA. MCSTs must develop and implement data protection policies and practices for complying with the PDPA, including for handling personal data requests and retaining personal data. These policies and practices must be communicated to their managing agents, and information about these policies and practices should be made available upon request.
  - c. MCSTs must protect personal data. In addition, under sections 21 and 22 of the PDPA, individuals can request access to and correction of their own (and only their own) personal data held by MCSTs, subject to the exceptions in the PDPA. Reasonable service fees may be charged by MCSTs for access, if the requestor is given a written estimate in advance. Before granting access, MCSTs must ensure that the personal data of other persons, such as non-subsidary proprietors, is redacted or otherwise protected. If a request is denied, clear reasons should be provided.

- d. For all applications whether under the B(SM)A or PDPA, MCSTs should verify who is making the request and, where necessary, ask why they need the data to determine whether there are any restrictions that apply and/or how best to provide it.

3 If you require any clarification on the above, you may wish to write in via the following online feedback forms:

BCA Online Feedback Form	PDPC Online Feedback Form
	

Thank you

Yours faithfully



MS ANN TANG  
DIRECTOR, BUILDING MANAGEMENT DEPT  
BUILDING PLAN & MANAGEMENT GROUP  
BUILDING AND CONSTRUCTION AUTHORITY  
For and on behalf of the Commissioner of  
Buildings



MR BAY CHUN HOW  
DIRECTOR, CONSUMER SERVICES & INVESTIGATION  
DATA INNOVATION & PROTECTION GROUP  
PERSONAL DATA PROTECTION COMMISSION

## ANNEX A– FREQUENTLY ASKED QUESTIONS

Question	Answer
<b>B(SM)A related queries</b>	
1. How can MCST facilitate SPs' request to records/documents under the MCST's custody? Who is entitled to make an application under section 47 of the B(SM)A?	<p>Section 47 of the B(SM)A provides that the MCST may upon <u>application to it made in writing</u> in respect of a lot, and <u>payment of a prescribed fee</u>, make available for inspection information in its custody.</p> <p>An application can be made by a subsidiary proprietor or mortgagee or prospective purchaser or mortgagee of that lot or by a person authorised in writing by such a subsidiary proprietor or mortgagee.</p>
2. Can MCSTs charge any fees for SPs' request for documents?	<p>The prescribed fee or payment for services rendered by the MCST for supplying information under section 47 of the B(SM)A is spelt out under Regulation 11 of the Building Maintenance (Strata Management) Regulations.</p> <p>For more information on the supply of information by MCST, you may wish to refer to paragraph 6.1 of Strata Management Guide (SMG) Topic 8 ("Maintaining MC's Records") which can be downloaded from: <a href="#">Strata Management Guides   Building and Construction Authority (BCA)</a>.</p>
<b>PDPA related queries</b>	
1. Is it mandatory for my MCST to appoint a DPO?	<p>All organisations, including sole proprietorships and non-profit organisations, are required to designate at least one person, a Data Protection Officer (DPO), to be responsible for ensuring that the organisation complies with the PDPA.</p> <p>Organisations are also required to ensure that at least one DPO's business contact information is made available to the public. The business contact information may be a general telephone or email address of the organisation.</p>
2. Who can be a DPO?	<p>The DPO may be an individual whose scope of work solely relates to data protection or an individual in the MCST who takes on this role as one of his multiple responsibilities.</p> <p>MCSTs with manpower constraints may outsource operational aspects of the DPO function to a third-party, e.g. managing agents, law firms, and corporate service providers. To be clear,</p>

	<p>compliance by the MCST with the PDPA remains the responsibility of the MCST.</p> <p>A DPO should ideally be:</p> <ul style="list-style-type: none"> <li>• a council member of the MCST or have direct reporting line to the MCST; and</li> <li>• sufficiently skilled, knowledgeable, and empowered to drive data protection policies and practices in the MCST.</li> </ul> <p>It is advisable for the DPOs to attend the <a href="#">Fundamentals of the PDPA</a> to gain a good understanding of PDPA and the <a href="#">Practitioner Certificate in PDP (Singapore)</a> to acquire the knowledge and skills needed to establish a robust data protection policies and practices for the MCST. These courses are eligible for funding under the SkillsFuture if you meet the eligible criteria.</p> <p>You may find out more about the responsibilities of the DPO via the <a href="#">PDPC website</a>.</p>
3. Is it mandatory to register my MCST's DPO?	<p>Under the PDPA, it is mandatory for organisations to appoint a DPO and make the DPO's business contact information publicly accessible.</p> <p>While registering your MCST's DPO is voluntary, doing so would offer exclusive benefits, including:</p> <ul style="list-style-type: none"> <li>• Access to free workshops and resources to support DPOs in safe data use</li> <li>• Updates on the latest PDPA developments and best practices</li> <li>• Insights into key data trends</li> </ul> <p>Registering your DPO with PDPC enhances your MCST's ability to stay informed and compliant.</p>
4. Is there a deadline to register my MCST's DPO?	<p>There is no deadline to register your DPO. However, we strongly encourage your MCST to register your DPO as early as possible so that he/she can be kept abreast of relevant personal data protection developments in Singapore.</p>
5. Where can my MCST's DPO register with the PDPC?	<p>MCSTs can register their DPOs via the <a href="#">PDPC website</a>. Once the online submission is successful, an acknowledgement email will be sent to the email address provided. If you did not receive the acknowledgement email, please check your spam folder. For further assistance, please <a href="#">contact PDPC here</a>.</p>

6. Are there any penalties involved should MCST not appoint a DPO?

The specific enforcement action(s) taken by the PDPC for a MCST's failure to appoint a DPO will depend on the circumstances of the data breach incident, the MCST's non-compliance with the PDPA and its response to rectify the situation. Enforcement outcomes could comprise Warnings, Directions or Financial Penalty. Therefore, it is crucial for MCSTs to comply with the requirement to appoint a DPO, as mandated by the PDPA, and ensure proper data protection governance.

For other questions related to the DPO, please visit the [PDPC website](#).

