

SCREEN LMS

Email and Electronic Communications Notice

Separates essential service messages from optional marketing and explains preferences, unsubscribe and anti-spam controls.

LEGAL AND ASSURANCE STATUS: Operational draft for implementation and UAT. It has not been represented as approved by Singapore-qualified counsel, an accredited certification body or an external auditor.

Document code	EMAIL-001	Version	1.0
Effective date	2026-07-12	Next review	2027-07-12
Owner	Data Chord Pte. Ltd.	Audience	admin; auditor; super_admin
Status	Pending review by Singapore-qualified counsel and the appointed DPO	Acknowledgement	Required for designated roles

Change history

Version / effective date	Change	Owner	Approval status
1.0 / 2026-07-12	New electronic communications policy.	Data Chord Pte. Ltd.	Pending required approval and legal review

Controlled copy: the current LMS-published version. Printed or forwarded copies are uncontrolled. A material change creates a new version; earlier versions and acceptance evidence are preserved.

Purpose and scope

Separates essential service messages from optional marketing and explains preferences, unsubscribe and anti-spam controls.

This document applies to Screen LMS application operations, relevant Azure services, authorised users, administrators, service providers and records within its stated audience.

Governance principles

- Apply Singapore law, contractual commitments and approved organisational policy using documented, risk-based decisions.
- Use data minimisation, least privilege, separation of duties and secure defaults.
- Preserve evidence sufficient to demonstrate what was decided, implemented, tested and reviewed.
- Escalate uncertainty; do not treat this operational draft as legal advice or certification evidence by itself.

Roles and responsibilities

- The document owner maintains this controlled version, monitors changes and initiates review after a material legal, technical, supplier or business change.
- Managers assign accountable control owners, approve resources and review significant exceptions, risks, incidents and overdue actions.
- Users and authorised suppliers follow the policy, complete required training, protect credentials and report suspected incidents or nonconformities promptly.
- The Data Protection Officer reviews personal-data implications and the security owner reviews confidentiality, integrity and availability implications.

Essential and optional messages

Essential security, account, assessment, recovery and critical service messages are sent where needed to operate and protect the service. Optional marketing or catalogue communications use a separate category preference and are not an access condition.

Sender and content controls

Messages identify the sender, use an approved template and purpose, provide a plain-text alternative, avoid deceptive subjects, protect variables and direct the recipient to the specific authorised LMS destination.

Unsubscribe and preferences

Applicable optional messages contain a clear category-level unsubscribe action. Tokens are signed, recipient-bound and expiring; suppression takes effect immediately in Screen LMS. Essential communications cannot be disabled through the marketing preference control.

Message controls

- Use a documented template key, category, sender identity, subject, plain-text alternative, accessible action and exact authorised deep link.
- Sanitise administrator-supplied HTML, allowlist variables and reject unresolved placeholders.
- Bind unsubscribe tokens to the intended recipient and category, sign them, expire them and prevent open redirects.
- Keep the logo in the footer and avoid deceptive subjects, hidden sender identity or generic 'click here' actions.

Records and evidence

- Keep the approved version, superseded versions, approval record, publication record, acceptance evidence where required, training evidence, exceptions and review decisions.
- Apply role and tenant access restrictions, protect evidence from unauthorised change, and use the approved retention and secure-disposal schedule.
- Do not place secrets, passwords, access tokens or unnecessary personal data in governance evidence or issue trackers.

Monitoring, exceptions and review

The owner reviews the policy at least by the scheduled date and after a material incident, audit finding, law change, supplier change, architecture change or significant processing change.

- Record each exception with business justification, affected assets or data, risk, compensating controls, approver, owner, expiry and review date.
- Track findings and overdue actions through the corrective-action process and verify effectiveness before closure.
- A material change creates a new controlled version. Where the policy is an access condition, the LMS presents the new version for renewed acceptance while preserving earlier evidence.

Official sources and external references

Sources were checked during the 12 July 2026 policy refresh. The document owner must verify the current official version during every review. A source citation does not mean the issuing body has approved Screen LMS or this document.

- **Attorney-General's Chambers, Singapore: Personal Data Protection Act 2012 (Singapore Statutes Online)** — <https://sso.agc.gov.sg/Act/PDPA2012>
- **Attorney-General's Chambers, Singapore: Spam Control Act 2007** — <https://sso.agc.gov.sg/Act/SCA2007>
- **Infocomm Media Development Authority: Best Practices for Organisations - Unsolicited Communications** — <https://www.imda.gov.sg/infocomm-regulation-and-guides/unsolicited-communications/best-practices-for-organisations>

Approval and review record

Role	Name	Decision / date	Notes
Document owner	To be completed	Pending	Required before representing this document as fully approved
Information security	To be completed	Pending	Required before representing this document as fully approved
Data Protection Officer	To be completed	Pending	Required before representing this document as fully approved
Singapore-qualified legal reviewer	To be completed	Pending	Required before representing this document as fully approved