

Technology, Media & Telecommunications

Annex C of Internet of Things Cybersecurity Guide (Case Study for Smart Buildings)

In March 2020, the Infocomm Media Development Authority ("**IMDA**") launched an Internet of Things ("**IoT**") Cyber Security Guide ("**Guide**") to offer enterprise users and their vendors better guidance on deploying IoT technology. The Guide aims to help enterprise users and their vendors address the cyber security aspects of IoT systems in the acquisition, development, operation and maintenance of these systems.

To help the Facilities Management ("**FM**") industry in the implementation of security requirements of smart IoT FM systems, IMDA sought to enhance the Guide with a new annex ("**Annex C**"), which is a case study on Smart Buildings. To solicit feedback on the proposed Annex C, IMDA issued a Public Consultation on 29 July 2022, which was open for a period of six weeks.

Annex C of the Guide has now been finalised and published on 1 December 2022. IMDA has indicated that it has carefully considered all the suggestions and comments received in the Public Consultation and has revised Annex C to incorporate the applicable inputs to enhance the clarity and applicability of Annex C, while ensuring that Annex C remains succinct to be useful.

IMDA has also issued an Explanatory Memorandum for the Public Consultation on Annex C. This document sets out the key issues raised in the Public Consultation and provides IMDA's responses and decisions on these issues. IMDA indicated that Respondents were generally positive and supportive of Annex C, and have provided suggestions to enhance Annex C. The key issues cover the following areas: (i) general architecture of Smart Building; (ii) security objectives; (iii) applied vendor disclosure checklist; and (iv) overall coverage and usefulness.

The finalised Annex C provides a sample IoT application for Smart Building to illustrate the application of the recommendations defined in the Guide. It covers the following areas:

- (a) Identify the target of protection;
- (b) Define the security problem;
- (c) Conduct risk assessment;
- (d) Determine the security objectives; and
- (e) Define the security requirements.

Technology, Media & Telecommunications

Click on the following links for more information (available on the IMDA website at www.imda.gov.sg):

- [IMDA's Explanatory Memorandum for the consultation on the new Annex C of IMDA IoT Cyber Security Guide](#)
- [IMDA IoT Cyber Security Guide Annex C](#)

Contacts



Rajesh Sreenivasan
Head, Technology, Media &
Telecommunications

T +65 6232 0751

rajesh@rajahtann.com



Steve Tan
Deputy Head, Technology,
Media & Telecommunications

T +65 6232 0786

steve.tan@rajahtann.com



Benjamin Cheong
Deputy Head, Technology,
Media & Telecommunications

T +65 6232 0738

benjamin.cheong@rajahtann.com



Lionel Tan
Partner, Technology, Media &
Telecommunications

T +65 6232 0752

lionel.tan@rajahtann.com



Tanya Tang
Partner (Chief Economic and
Policy Advisor), Technology,
Media & Telecommunications

T +65 6232 0298

tanya.tang@rajahtann.com

Please feel free to also contact Knowledge Management at eOASIS@rajahtann.com

Regional Contacts

R&T SOK & HENG | *Cambodia*

R&T Sok & Heng Law Office

T +855 23 963 112 / 113

F +855 23 963 116

kh.rajahtannasia.com

RAJAH & TANN | *Myanmar*

Rajah & Tann Myanmar Company Limited

T +95 1 9345 343 / +95 1 9345 346

F +95 1 9345 348

mm.rajahtannasia.com

RAJAH & TANN 立杰上海

SHANGHAI REPRESENTATIVE OFFICE | *China*

Rajah & Tann Singapore LLP

Shanghai Representative Office

T +86 21 6120 8818

F +86 21 6120 8820

cn.rajahtannasia.com

GATMAYTAN YAP PATACSIL

GUTIERREZ & PROTACIO (C&G LAW) | *Philippines*

Gatmaytan Yap Patacsil Gutierrez & Protacio (C&G Law)

T +632 8894 0377 to 79 / +632 8894 4931 to 32

F +632 8552 1977 to 78

www.cagatlaw.com

ASSEGAF HAMZAH & PARTNERS | *Indonesia*

Assegaf Hamzah & Partners

Jakarta Office

T +62 21 2555 7800

F +62 21 2555 7899

Surabaya Office

T +62 31 5116 4550

F +62 31 5116 4560

www.ahp.co.id

RAJAH & TANN | *Singapore*

Rajah & Tann Singapore LLP

T +65 6535 3600

sg.rajahtannasia.com

RAJAH & TANN | *Thailand*

R&T Asia (Thailand) Limited

T +66 2 656 1991

F +66 2 656 0833

th.rajahtannasia.com

RAJAH & TANN | *Lao PDR*

Rajah & Tann (Laos) Co., Ltd.

T +856 21 454 239

F +856 21 285 261

la.rajahtannasia.com

RAJAH & TANN LCT LAWYERS | *Vietnam*

Rajah & Tann LCT Lawyers

Ho Chi Minh City Office

T +84 28 3821 2382 / +84 28 3821 2673

F +84 28 3520 8206

CHRISTOPHER & LEE ONG | *Malaysia*

Christopher & Lee Ong

T +60 3 2273 1919

F +60 3 2273 8310

www.christopherleeong.com

Hanoi Office

T +84 24 3267 6127

F +84 24 3267 6128

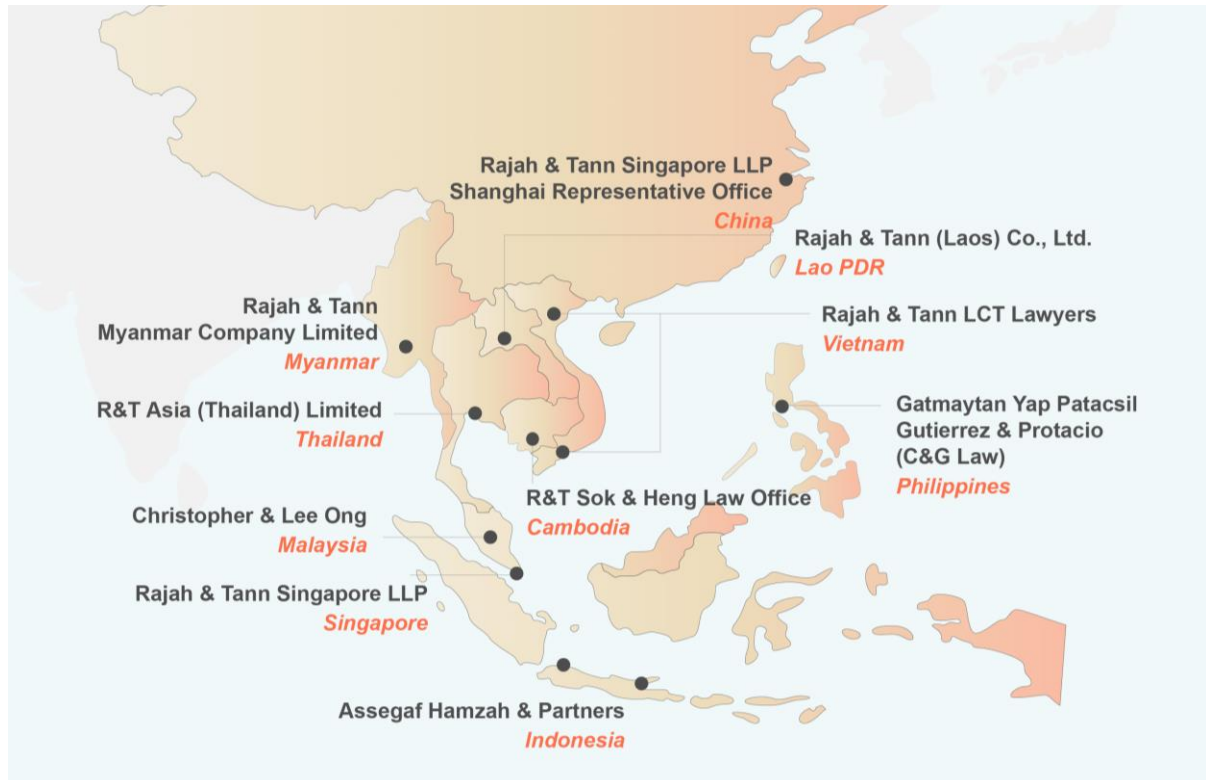
www.rajahtannlct.com

Rajah & Tann Asia is a network of legal practices based in Asia.

Member firms are independently constituted and regulated in accordance with relevant local legal requirements. Services provided by a member firm are governed by the terms of engagement between the member firm and the client.

This update is solely intended to provide general information and does not provide any advice or create any relationship, whether legally binding or otherwise. Rajah & Tann Asia and its member firms do not accept, and fully disclaim, responsibility for any loss or damage which may result from accessing or relying on this update.

Regional Presence



Rajah & Tann Singapore LLP is one of the largest full-service law firms in Singapore, providing high quality advice to an impressive list of clients. We place strong emphasis on promptness, accessibility and reliability in dealing with clients. At the same time, the firm strives towards a practical yet creative approach in dealing with business and commercial problems. As the Singapore member firm of the Lex Mundi Network, we are able to offer access to excellent legal expertise in more than 100 countries.

Rajah & Tann Singapore LLP is part of Rajah & Tann Asia, a network of local law firms in Cambodia, China, Indonesia, Lao PDR, Malaysia, Myanmar, the Philippines, Singapore, Thailand and Vietnam. Our Asian network also includes regional desks focused on Brunei, Japan and South Asia.

The contents of this Update are owned by Rajah & Tann Singapore LLP and subject to copyright protection under the laws of Singapore and, through international treaties, other countries. No part of this Update may be reproduced, licensed, sold, published, transmitted, modified, adapted, publicly displayed, broadcast (including storage in any medium by electronic means whether or not transiently for any purpose save as permitted herein) without the prior written permission of Rajah & Tann Singapore LLP.

Please note also that whilst the information in this Update is correct to the best of our knowledge and belief at the time of writing, it is only intended to provide a general guide to the subject matter and should not be treated as a substitute for specific professional advice for any particular course of action as such information may not suit your specific business and operational requirements. It is to your advantage to seek legal advice for your specific situation. In this regard, you may call the lawyer you normally deal with in Rajah & Tann Singapore LLP or email Knowledge Management at eOASIS@rajahtann.com.