



Lim Shao Min
Associate Director, Corporate & Finance

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ABOUT SHAO MIN

Shao Min is an Associate Director with the Corporate & Finance Department in Drew & Napier.

Her key areas of practice are Technology, Media, and Telecommunications (TMT), Data Protection, Privacy and Cybersecurity, as well as Artificial Intelligence (AI) and Digital Trust.

Shao Min's practice includes advising on complex telecommunications regulation and data protection/cybersecurity matters, including work that supports both the industry and regulators. On the TMT side, she advises regulators on the application and enforcement of telecommunications and sectoral competition laws and regulations, including drafting decisions, directions and codes of practice. She also advises major telecommunications companies on their contracts across fibre broadband, mobile and TV services.

In the data protection space, she advises organisations on the management and reporting of data breach incidents and has assisted with making notifications and representations to the regulator, including on novel areas involving reliance on the Legitimate Interests Exception and breach of statutory timelines for incident reporting. She has also advised many multi-national corporations on their data protection compliance and governance obligations and regularly assists to draft required contracts and documentation such as privacy policies, data protection impact assessments, and cross-border data transfer agreements.

Shao Min's practice also includes AI-focused advisory work. For instance, she has advised on IP and liability issues arising for AI chatbots, advised a legal tech company on deploying a large language model (LLM) product in Singapore (including boundary-setting to avoid unauthorised practice of law risk, IP liability-risk controls, and data storage/processing considerations), and

advised on infrastructure procurement and commercial documentation for high-performance computing resources used in AI training. She also regularly advises one of the world's leading AI safety and research companies and LLM developers on online safety laws, training AI models with user personal data, and processing sensitive personal data.

Shao Min was seconded to a Singapore-headquartered APAC technology group, supporting in-house stakeholders by negotiating, drafting and advising on a range of commercial IT agreements, including vendor partnerships, reseller agreements, software licensing, master services agreements, platform terms of use, and non-disclosure agreements.

Before joining the firm in 2021, Shao Min trained and practised in one of Singapore's largest law firms under a Senior Counsel's team, where she worked on commercial litigation and arbitration matters. These matters include SIAC and HKIAC arbitrations involving complex cross-border structures and high-value claims, and actions before the Supreme Court involving fraud and conspiracy in relation to one of Singapore's largest and most significant corporate insolvency and fraudulent trading cases.

EXPERIENCE

The matters Shao Min has been involved in include:

Data Protection & Cybersecurity

- Advising organisations on the development of data protection policies, data retention schedules, privacy notices, and contractual clauses. This includes reviewing an organisation's existing data protection program, flagging gaps in compliance and recommending remediation steps.
- Advising businesses with global operations on their cross-border transfers

of data, preparing data protection impact assessments, reviewing data processing addenda, and coordinating multi-jurisdictional data protection advisory projects.

- Advising both local and multi-national organisations on investigations in respect of data breaches, including making notifications to the Personal Data Protection Commission of Singapore and affected individuals, and drafting representations for organisations.
- Advising a large multi-national corporation on the conduct of its annual cybersecurity audit, which includes a comprehensive legal review of its cybersecurity measures for compliance with local laws and regulations.
- Advising a large US-based AI company on data protection issues concerning the training of AI models using user data (including sensitive personal data), applicable online safety laws, and general business risks for operations in Singapore.
- Advising on the use of cloud services in Singapore, including the powers of public authorities in Singapore to inspect and seize data stored on servers owned by Singapore companies or servers located in Singapore.

TMT, Commercial & Regulatory

- Advising a multi-national technology company on regulatory issues relating to data centres, including issues arising under the Infrastructure Protection Act 2017, Telecommunications Act 1999, Cybersecurity Act 2018, Strategic Goods (Control) Act 2002, and Personal Data Protection Act 2012.
- Advising on issues arising from the effects of export control laws and regulations restricting exports of emerging technologies (e.g., AI systems, semiconductor chips).
- Coordinating multi-jurisdictional surveys on data centre resiliency, security and sustainability legislation in 15+ jurisdictions across Asia, US and Europe.
- Reviewed an agreement for the supply of telecommunications equipment for IP

infringement issues arising from the supplier's use of third-party system software (including open-source software) and advised on solutions to mitigate the buyer's risk of liability.

- Reviewing and negotiating IT contracting agreements, such as those pertaining to vendor partnerships, reseller agreements, software licensing, teaming agreements, master service agreements, terms of use, and non-disclosure agreements.
- Reviewing consumer contracts for a Singapore-headquartered telecommunications company, including agreements on fibre broadband, mobile services, and television services.
- Reviewing commercial playbooks for a leading US-based data and AI platform and advising on legal and operational risks for its procurement projects.
- Advising on online gaming and gambling laws and regulations in Singapore, including gambling advertising, for a major cruise ship company.
- Advising on regulatory repercussions arising under Singapore product liability laws, particularly in relation to consumer protection.
- Advising regulators in Singapore on the application and enforcement of telecommunications and sectorial competition regulation, including drafting decisions, codes of practice, and appeal submissions to the Minister.

Artificial Intelligence Advisory

- Advised a multi-national telecommunications company on intellectual property and liability issues arising from the implementation of AI chatbots in the workplace to boost employee productivity.
- Advised a legal technology company on the deployment of its large language model product in Singapore to provide legal services. In particular, helping it to set boundaries on its services offered so that it will not fall afoul of unauthorised practice of law provisions in the Legal Profession Act 1966, designing measures to reduce its potential liability for incorrect output, and advising on its present and

future arrangements for data storage and data processing both overseas and in Singapore.

- Advised a local startup on their procurement of high-performance computing resources (i.e. Nvidia GPUs) to train AI models and reviewing and drafting Infrastructure-as-a-Service contractual documents.
- Advising a multi-national internet technology company on legal risks arising from web-scraping, including intellectual property issues, breach of the Computer Misuse Act 1993, and breach of the Personal Data Protection Act 2012.

APPOINTMENTS/MEMBERSHIPS

- Member, Law Society of Singapore
- Member, Singapore Academy of Law