



Cheryl Seah
Director, Corporate & Finance

LL.B. (Hons), National University of Singapore (2012)
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ABOUT CHERYL

Cheryl is a Director with the Corporate & Finance Department in Drew & Napier.

Her key areas of practice are Telecommunications, Media & Technology (TMT), Artificial Intelligence (AI) and Digital Trust and Administrative & Public Law.

Cheryl advises clients on regulatory matters, ranging from cybersecurity to payment services to gaming. She also advises clients on legal, contractual and governance issues arising from their use of AI at all stages of the AI life-cycle: from procuring the computing resources, to the data used in model training, to the IP and liability issues arising from the output.

Cheryl publishes frequently on legal issues arising from the use of AI with the Law Society of Singapore, where her work has been cited in a Singapore regulator's report, and also featured in the Law Society's yearly top 10 most read articles. She has conducted talks on AI for external organisations (e.g., IPOS International, LexisNexis SEA), local and ASEAN regulators, and in local (NUS, SMU) and European universities. She has also been invited to contribute her views on AI issues with research institutions such as the Global Cyber Security Capacity Centre at the University of Oxford, and the Global Index on Responsible AI.

Before joining the firm in 2022, Cheryl was a State Counsel/Legislative Drafter in the Legislation Division of the Attorney-General's Chambers (Singapore's national law drafting office). For 8 years, she has advised Ministries and Statutory Boards on their policies, helping them to manage the legal risks of their policies, and proposing alternatives where the legal risk is high. She drafts the necessary legislation which is then published if the policy also requires a change in the law.

Cheryl has advised on and drafted legislation across a wide variety of subjects, with a focus on transport (including autonomous vehicles),

infrastructure, technology, and civil procedure. While in Drew & Napier, she continues to advise local statutory boards, and has embarked on a legislative project for a foreign regulator.

Cheryl is also familiar with leading and organising projects, having successfully worked with internal and external stakeholders to deliver a significant national project – the 2020 Revised Edition of Acts – Singapore's largest revision of laws to date, spanning 510 Acts with 27,000 pages.

Prior to becoming a Legislative Drafter, Cheryl was a Deputy Public Prosecutor. Cheryl graduated from the National University of Singapore and was placed third in the 2012 Singapore Bar Examinations.

EXPERIENCE

The matters Cheryl has been involved in include:

Payment Services Advisory

- Advised a foreign company on the applicability of the Payment Services Act 2019 to the payment structures in its proposed collaboration with a Singapore company and a UK company to provide services in Singapore
- Advised a major international electronics business on its intended issuance of non-fungible tokens (NFTs)
- Advised a public-private partnership entity on whether its operational processes distributing cryptocurrencies for payment required a PSA licence
- Advised local and foreign licensees on their reporting obligations to the Monetary Authority of Singapore and Suspicious Transaction Reporting Office

Artificial Intelligence Advisory

- Advised a Fortune 500 multinational corporation on mitigating the intellectual property and liability issues arising from the implementation of a ChatGPT-like system in the workplace to answer questions and generate documents and code
- 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 GPUs to train AI models and reviewing and drafting Infrastructure-as-a-Service contractual documents
- Advised a leading identity verification service provider on the AI Governance Addendum to its vendor contract, and on Singapore's data protection laws when using AI to process personal data
- Advised a legal technology company customizing large language models on its terms of service for Singapore users
- Advised a leading frontier AI model developer on the deployment of its generative AI services in Singapore
- Advised a local company on the scope of customer information it may use to develop machine learning models to make predictions about behaviour
- Advised a multinational software company developing AI solutions on government procurement issues in Singapore
- Drafted legislation with respect to autonomous vehicle trials

- One of 5 lawyers in a delegation from the Attorney-General's Chambers (Singapore) to Estonia/Luxembourg in 2019 to study their use of technology when delivering public services

Artificial Intelligence Training Services

- Conducted training for over 100 senior management personnel of an American MNC with consumer-facing businesses on deploying AI safely and legally
- Designed and conducted a half-day (paid) course on the legal issues and contractual terms to look out for when procuring an AI solution – this was attended by over 40 local and overseas participants
- Conducted training for board members of a leading Asian insurer on the legal and ethical issues arising from the use of AI

TMT & general corporate matters

- Advised a local IT company on licensing issues for its software application for drivers, and drafted its privacy policy and terms of use
- Advised a multinational cloud service provider on the impact of the 2023 amendments to the Cybersecurity Act 2018 on its operations in Singapore
- Advised a multinational company on the setting up of an app store in Singapore, covering a wide range of issues from competition laws to content restrictions
- Drafted various agreements to support commercial projects, including independent contractor agreements, subcontractor agreements and consortium agreements
- Advised a local entity on safeguards to protect its existing assets in relation to its financing arrangements for overseas expansion
- Advised on a joint venture between a Singapore company and a foreign company to provide training and

consultancy services in the foreign jurisdiction

- Advised a foreign state on the applicability of international treaties to its special economic zone
- Advised a local client on the applicability of Free Trade Agreements
- Advised a multinational electronics business on price variation and termination clauses in supplier contracts
- Advised a company with worldwide distribution on product recalls

Legislative Drafting & Advisory

- Co-drafted the Rules of Court 2021, which span over 600 pages and introduce significant reforms to the civil justice system
- Assisted in the drafting of the Cross-Border Railways Act 2018 to implement the \$17 billion cross-border high speed rail project between Singapore and Malaysia; advised stakeholders on financing and operational issues, as well as on how to address representations sent in from members of the public and corporations on the impact of the project
- Advised on and drafted legislation for public order matters
- Advised on the implementation of new security regimes for air cargo agents and consignors for the carriage of cargo on commercial aircraft, and drafted legislation to give effect to the policy changes
- Representative on inter-agency committee (2013 – 2014) to study changes to criminal procedure and the investigative process in relation to the videorecording of interviews (note: legislative changes have since been introduced in 2018)
- Designed and conducted annual half-day workshops on the legislative process and legislative drafting techniques in collaboration with the Ministry of Education (MOE) for MOE's Moot Parliament Programme. Conducted workshops for

National University of Singapore and Singapore Management University law students, as well as upper secondary school students (2017 – 2022)

- (2024) In personal capacity (having volunteered with MOE's Moot Parliament Programme since 2009), engaged by MOE to develop online resources for students on how to effectively translate policy into law

Legal policy / legal project management

- (February 2019 – December 2021) Was one of 2 lawyers managing Singapore's largest revision of Acts to date, covering all current legislation in the Singapore Statute Book (510 Acts, 27,000 pages). This exercise to update and simplify Singapore's laws was reported in the Straits Times "*Over 500 Singapore laws to be made easier to read*" on 20 December 2021 and other local media. It was chaired by the Attorney-General and involved the entire Legislation Division (~70 officers) due to its scale:
 - Set project milestones, laid out steps, timelines, and manpower needs, and constantly monitored progress, ensuring the project was completed by the publicly communicated date of 31 December 2021
 - Developed policies for the revision of the language of Acts to ensure consistency across the Statute Book, without affecting the meaning of any Act
 - Advised Ministries on the legal implications of the revision changes applied to their Acts
 - Worked closely with the Legislation Division's IT team to ensure that the Division's custom drafting software could meet the technical requirements of the project as well as the procedures required by law under the Revised Edition of the Laws Act 1983

ACCOLADES

- **Singapore Law Gazette Awards 2024** – Best Feature Article, titled "Navigating the Ever-evolving AI Landscape: What

Lawyers and Businesses in Singapore Should Know”

- **Singapore Business Review** – identified as one of Singapore’s 20 most notable lawyers under 40 in 2024

PUBLICATIONS

- “Liability arising from the use of artificial intelligence” in the *Singapore Law Gazette*, May 2023
- “Artificial Intelligence: Learned Friend or Foe?” in the *Singapore Law Gazette*, August 2023
- “Navigating the Ever-evolving AI Landscape: What Lawyers and Businesses in Singapore Should Know” in the *Singapore Law Gazette*, September 2023
- “Generative AI: An Evaluation of the Current Solutions to Address the Intellectual Property Challenges it Generates” in the *Singapore Law Gazette*, November 2023
 - Cited in the Intellectual Property Office of Singapore and Singapore Management University’s report “When Code Creates: A Landscape Report on Issues at the Intersection of Artificial Intelligence and Intellectual Property Law” (February 2024)
 - Ranked in the top 10 most read *Law Gazette* articles of 2024
- “Round Up of Significant Legal Developments in AI for 2023” in the *Singapore Law Gazette*, December 2023
- “Liability for AI-generated Content” in the *Singapore Law Gazette*, March 2024
 - Ranked in the top 10 most read *Law Gazette* articles of 2024
- “Open-source AI Models – What Are They, and Closing the Safety and Liability Gaps” in the *Singapore Law Gazette*, November 2024
- Chambers Global Practice Guides – Artificial Intelligence 2023, 2024 (Singapore) – co-authored the inaugural Singapore chapter

- Global Legal Insights – AI, Machine Learning & Big Data Laws, and Regulations 2023, 2024 (Singapore)
- Lexology – Artificial Intelligence 2024 (Singapore) – co-authored the inaugural Singapore chapter
- The Legal 500 – Artificial Intelligence Guide 2023, 2024 (Singapore) – co-authored the inaugural Singapore chapter
- “Singapore’s 2020 Revised Edition of Acts” in the *Journal of the Commonwealth Association of Legislative Counsel*, June 2022 (Issue No. 1 of 2022)

SPEAKING ENGAGEMENTS

- IPOS International: IT Law Series on the Regulation of Artificial Intelligence (13 July 2023)
- University of Oslo Faculty of Law: “AI Governance in ASEAN – an overview, international comparisons, and what lies ahead” (12 March 2024)
- LexisNexis Southeast Asia: “Leveraging AI in Legal Practice” (26 March 2024)
- Singapore Management University Centre for AI & Data Governance: “AI Governance: Internationality and Interoperability” (20 June 2024)
- Singapore International Chamber of Commerce: “Rules governing AI” (24 July 2024)
- Attorney-General’s Chambers, Singapore: “AI Governance and Liability” (7 August 2024)
- National University of Singapore (guest lecture for ‘Corporations, Technology and the Law’): “AI: Policy & Practice” (11 September 2024)
- Thales: “Data Security” (21 November 2024)
- Invited to contribute views on how Singapore addresses the legal and governance challenges brought about by the use of AI to leading research institutions:
 - the Global Index on Responsible Artificial intelligence, which measures progress on the responsible use of AI in over 140 countries and is funded by

- the IDRC, the Government of Canada and USAID
- the Global Cyber Security Capacity Centre at the University of Oxford, to create an AI Cybersecurity Readiness Metric

APPOINTMENTS/MEMBERSHIPS

- Industry Fellow, SMU Centre for Digital Law
- Member, Law Society of Singapore
- Member, Law Society of Singapore Information Technology Committee
- Member, Law Society of Singapore Publications Committee
- Member, Singapore Academy of Law
- Member, Commonwealth Association of Legislative Counsel