《2018年網絡安全法》的疊加要求

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《2018年網絡安全法》（Cybersecurity Act 2018）設立了網絡安全局（Cyber Security Agency），並建立了關鍵資訊基礎設施制度。根據該制度，對提供基本服務屬必不可少的系統，其被指定的擁有人必須遵守實務守則、報告事故並接受審計。[1]銀行及金融屬於基本服務界別，但關鍵資訊基礎設施的指定由專員就個別系統作出，至今並未擴展至加密資產交易所。2024年的修訂擴大了該法的範圍，涵蓋具臨時網絡安全關注的系統、具特殊網絡安全利益的實體，以及雲端和數據中心服務等基礎數碼基礎設施。這些修訂透過加密資產業務的服務供應商，間接觸及這些業務。[2]

因此，對加密資產平台而言，實際適用的網絡安全要求來自新加坡金融管理局（MAS）。《科技風險管理指引》及《科技風險管理通告》訂定了標準及報告責任。《網絡衛生通告》則對所有持牌金融機構施加基本控制措施。[3]《1993年濫用電腦法》（Computer Misuse Act 1993）就未經授權存取及修改訂立刑事罪行，不論受害人是否被指定的基礎設施擁有人，這些罪行均適用於黑客。[4]

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註釋

1. Cybersecurity Act 2018，第3部（關鍵資訊基礎設施），特別是第7條（指定）、第10條（報告責任）、第14條（事故報告）及第15條（審計）。 ↩
2. Cybersecurity (Amendment) Act 2024，於2024年5月7日通過，在Cybersecurity Act 2018中加入第3A至3C部。 ↩
3. MAS Notice on Cyber Hygiene及MAS Technology Risk Management Guidelines（2021年1月）。第L部分第VII章論述其對DPT持牌人的適用。 ↩
4. Computer Misuse Act 1993，第3–5條。第N部分第I章論述有關罪行。 ↩

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