

Section	PDPC requirement	Feedback
1.4	<p>The requirement to port data between service providers has the potential to ease an individual's efforts to switch between different providers as it eliminates the repetitiveness of having to provide their personal data each time they switch between service providers, and thereby lowers switching costs for consumers.</p>	<ol style="list-style-type: none"> 1. To what extent can the organisation receiving the data rely on the accuracy of the data ported over? Data quality and controls differ across organisations and the organisation receiving the data is ultimately responsible for ensuring that the accuracy of the data in concern. Proper due diligence checks must be carried out and organisations may not benefit much from the time savings. 2. When financial institutions ("FIs") establish a customer relationship with an individual, there are additional AML/CFT customer onboarding requirements which requires FIs to identify the individual to a high level of fidelity. As such, FIs will not be able to solely rely on information provided by another organisation even if the organisation is within the same sector.
1.5	<p>Portability of historical transactional data is expected to create impetus for competitive offerings for customers to switch service providers as the new service provider can immediately provide more personalised services once it has access to the customer's historical transactional data.</p>	<ol style="list-style-type: none"> 1. What is the scope of "historical transactional data" and the timeline in concern e.g. within 1 year, within 5 years etc. 2. Is the required historical transactional data limited to the product/service level (ie. limited to historical transaction of the product/service that was switched) or at the customer level (ie. includes all historical transaction made by the customer including product/service that was not switched)? 3. Will the sharing of historical transactional data be restricted to organisations within the same sector? If such data is disclosed to cross-sector organisations, they will be collecting information in excess than what is required to establish the customer relationship, which is against the principles of PDPA. 4. Organisations need to be transparent on how the data is being used and individuals should be given an option to "opt-out" from these personalised services.
3.4	<p>Crucially, making the value of data more visible also supports the bringing together of diverse data sources. This creates benefits in terms of productive efficiency (e.g. more precise predictions based on a larger set of variables) and recombinant innovation. In turn, the greater visibility of the value of data would likely beget a more vibrant data sharing environment (within or across industries), enabling businesses to unlock greater value from diverse data sets and derive additional insights for the benefit of consumers.</p>	<ol style="list-style-type: none"> 1. With increased data sharing, the impact of any data breach will be magnified. Will the Commission be specifying the minimum security control standards for data porting? 2. Not all organisations will find value in receiving data relating to the individuals from other industries if the data is irrelevant. Also, what actions are expected of organisations when they receive data which they are not allowed to collect (e.g. NRIC) based on their business model? 3. Receiving/storing excessive data is also not aligned with PDPA's retention principle where personal data should not be retained if there is no longer any legal or business use for it. 4. When an individual has already ceased the customer relationship with the Company, will the Company still be obligated to port the individual's data (held within the Company's retention period) to another organisation upon the individual's request?

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3.8	<p>Economies of scope of inputs not only benefits organisations. Within data protection law, data portability is often discussed as a consumer right. The individual consumer determines whether his/her data is opened up to other organisations, and which organisations should be receiving his/her data. This allows the consumer to benefit from the cost savings made by organisations. By exercising his/her choice to withhold his/her data from organisations that provide 'bad offers' and choosing only to give it to organisations that extend 'good offers', consumers can assert positive pressure on service providers to provide more competitive service or product offerings.</p>	<ol style="list-style-type: none"> 1. How do organisations ensure that the individuals do not tamper with the data received from the first organisation before they provide the data to another organisation? 2. Will PDPC prescribe the minimum data fields required for porting data between organisations? 3. Sectors such as healthcare and finance typically collect more personal data as compared to other sectors. Such sectors will need to exercise more caution especially when porting data to organisations from another sector. Will organisations have the discretion to choose the data fields to be ported to other organisations? 4. Is the Commission intending to allow individuals to decide the type of information that the organisation has to provide to them? If so, <ol style="list-style-type: none"> a. Additional costs will be incurred for data porting. b. Who is responsible for ensuring that the data is extracted as per the individual's request? i.e. no excessive fields extracted by the organisation.
3.15	<p>The immediate economic effect of introducing data portability is a reduction in friction when it comes to transactions involving personal data. Rather than re-entering information (or waiting for data to accumulate), an individual can simply ask for his data to be transferred to another organisation.</p>	<ol style="list-style-type: none"> 1. Significant costs will be required to setup the network and infrastructure to enable transfer of data between organisations. Should there be a central government platform to manage the transfer of data for consistency? 2. Instead of having organisations transfer data amongst themselves, it might be more practicable for organisations to leverage on the existing infrastructure by collecting the most up-to-date and verified customer information from a single database managed by the government (eg. MyInfo) which some organisations have already implemented. 3. Who will be held responsible if data accuracy is compromised during transfer?