

The following are the CIMB Bank's comments for the few questions raised in the PDPC consultation paper:

Question 3: What are your views on the proposed reduction of the period for effecting withdrawal of consent to 10 business days, in line with the period to effect an unsubscribe request under the Spam Control Provisions?

CIMB Bank response:

The current situation within our organisation has the IT constraint of extracting the phone numbers for different channels based on the decision science for marketing campaign with the exclusion of the DNC and UNSUB list. The above process currently already takes up more than 10 to 12 business days which includes UAT testing, therefore with the change to 10 business days for the withdrawal of consent to take effect make it operationally unreasonable.

Question 5: Should B2B marketing messages be subject to the requirements under the DNC Provisions, in alignment with the coverage under the Spam Control Provisions?

CIMB Bank response:

Our view is that if the office/mobile phone of the individual appears on the business card of the individual then we will still treat that phone number as a 'BCI' and we will be able to continue to contact that phone number for commercial purposes. Can we also know that if publicly available phone number will also be subjected to the DNC provision?

Our view is that publicly available office numbers and business contact information (which include handphone numbers) should continue to be excluded from the DNC provision.

The suggested proposal to subject B2B messages to DNC would not generally yield the desirable outcome to businesses given the additional administrative burden. We respectfully entreat that PDPC reconsiders the proposals under Paragraphs 3.26 and 3.27.

Question 10: What are your views on the proposed Enhanced Practical Guidance framework?

CIMB Bank response:

The EPG is a good for organisation but it will be better if the EPG could be shared on the PDPC website so other organisations which have similar situations can make reference and so in compliance with the Regulation.