

Ref.	Topic	M1's Comments
3	Definition of and interpretation of what constitutes Personal Data ("PD")	-
4.3 – 4.6	Inbound Roaming	-
4.7 – 4.8	Outbound Roaming	In regard to the Transfer Limitation Obligation in respect of transfer of PD out of Singapore in the case of outbound roaming, it was noted that in order to strictly comply with the obligation, telcos would have to ensure that any PD transferred out of Singapore to roaming partners would have to be provided a standard of protection that is comparable to the protection under the PDPA. In practice this would be difficult to achieve as different jurisdictions have different privacy rules, and roaming agreements are generally as per the standards recommended by the GSMA. Accordingly, the current provisions on confidentiality under the bilateral roaming agreements may have to suffice.
4.9 – 4.11	Provision of subscriber identity for calls or text messages	-
4.12 – 4.13	Displaying PD in itemised bills	-
4.14 – 4.19	Prepaid mobile services	To seek PDPC's clarification on the following: Para 4.18(a) states that to fulfill the Notification Obligation, Operators may consider briefly stating purposes such as "marketing other telecommunication services" on the prepaid card. Can the PDPC clarify what it means by "marketing other telecommunication services"?
5.3 – 5.7	Specified messages sent by telcos	-
Others	How does the DNC Exemption Order work with the PDPA	To seek PDPC's guidance on the following: When the PDPA comes into effect on 2 July 2014 and customer's consent for collection, use and disclosure of PD is required, does the DNC Exemption Order continue to be applicable under the specified scenarios or is it rendered irrelevant?
	Customer's request for access to PD and access to information on how PD has been used	Will the PDPC provide guidelines on (i) the scope of which such requests are to be addressed and, (ii) the charges/fees that telcos may accordingly impose.