



OANDA[®]
ASIA PACIFIC

50 Collyer Quay, #04-03 OUE Bayfront,
Singapore 049321

Response to Public Consultation on Proposed Business Operation of the DNC registry

OANDA Asia Pacific Pte Ltd. (“OANDA”)

Contact Person:
Ms. Simone Tracy Tan
Email: tracytan@oanda.com
DID: +65 3106 2144, extension 2103
Mobile: +65 8128 2185

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1. Summary of Major Points

Thank you for providing OANDA Asia Pacific Pte. Ltd. (“OANDA”) with the opportunity to provide input with respect to the issued Personal Data Protection Commission Public Consultation entitled “Proposed Business Operation of the Do Not Call Registry”.

OANDA is of the opinion that the Personal Data Protection Act (Cap 26) (“Act”) does not apply to OANDA by virtue of “Deemed consent” under section 15. This is because the individuals have voluntarily provided their personal data to OANDA. However if it is interpreted that this Act does apply to OANDA, we wish to submit our inputs as follows.

In summary, OANDA has no major objections to the questions within the consultation paper.

However OANDA would like to propose a suggestion pertaining to the methods for checking the DNC registry. Instead of requiring organizations to submit their telephone numbers via the two methods- small number lookup and bulk upload, OANDA proposes the Commission to explore the possibility of offering Application Programming Interface (API) to organizations. This equips the organizations with the ability to allow their system to interact with the DNC database directly.

OANDA would also like to highlight that; we do not engage ourselves in any activities outlined in section 37(1) of the Act. We only contact clients who have registered with us for a demo or live account to follow-up with them on regulatory, on-boarding, Trading or account related issues. Permission to contact these clients is provided by the client at the time of registration.

2. Comments

Questions in relation to the process of registration and deregistration of Telephone Numbers with DNC registry:

Question 1: With reference to paragraphs 3.6 to 3.9, do you have any views/comments on the proposed process of registration and deregistration? Is the process simple and straightforward?

OANDA Response(s):

We have no comments and we view that the process is simple and straightforward.

Questions in relation to the methods provided for checking the DNC registry:

Question 6: With reference to paragraph 5.1, do you have any views/comments on the proposed methods on how to check the DNC registry?

OANDA Response(s):

In addition to the online single and bulk search capabilities, we propose a third search method via Application Programming Interface (API). This will allow organizations to automate the DNC search for newly created accounts with the organization. For example: Once the client enters in his telephone number, the API could automatically check the DNC database to confirm if the client is registered. If so, the system has the ability to then reconfirm with the client if they do not wish to be contacted by phone. Searches done via the API will be via a Subaccount created specially for these searches.

Questions in relation to the payment schemes:

Question 7: With reference to paragraph 6.6, what is the average quantity of Telephone Numbers would your organization be likely to submit for checks per month and which would be the scheme (pre-paid or pay-per-use) your organization be most likely to use as the form of purchase?

OANDA Response(s):

Average of 800 Telephone Numbers for checks per month via pre-paid payment scheme.

3. Conclusion

In general, OANDA has no major objections to the issued Public Consultation entitled “Proposed Business Operation of the Do Not Call Registry” other than the proposed alternate method of checking the DNC Registry in Question 6.

OANDA seeks the Commission to consider our comments and suggestions with consideration.

Should the Commission have any questions pertaining to OANDA’s submission, please contact our contact, Ms. Simone Tracy Tan.