Question 1: What are your views on the proposed criteria for limiting the collection, use or disclosure of individuals’ NRIC numbers or copies of the NRIC to instances where:
(a) it is required under the law; and
(b) it is necessary to accurately establish and verify the identity of the individual?

AIA Singapore: We are agreeable that it is required under the law and necessary to accurately establish and verify the identity of the individual.

Question 2: What are your views on the proposed criteria for limiting the retention of individuals’ physical NRIC to instances where:
(a) it is required under the law; and
(b) it is necessary to accurately establish and verify the identity of the individual?

AIA Singapore: We are agreeable that it is required under the law and necessary to accurately establish and verify the identity of the individual.

Question 3: Are there common scenarios or additional issues (e.g. updating of information systems) that these advisory guidelines should address?

AIA Singapore: No Comments.

Question 4: What are your views on the proposed provision of up to one year from the issuance of the advisory guidelines for organisations to review and implement changes to their practices and processes involving the collection, use or disclosure of NRIC numbers or copies of the NRIC, or the retention of physical NRIC?

AIA Singapore: We wish to propose up to 2 years to review and implement changes to our practices and processes involving the collection, use or disclosure of NRIC numbers or copies of the NRIC, or the retention of physical NRIC.