



Dear Commissioner,

In response to the **Public Consultation for Approaches to Managing Personal Data in the Digital Economy (issued 27 July 2017)**, we would like to submit our comments for this paper.

We agree with the suggestions raised and the approach to strike a reasonable balance between the need for organisations to collect, use and disclose personal data with individuals' right to protection of their personal data.

We have only one comment for section 6.13 (Time Frame for Breach Notification), where we feel it would be clearer to require that organisations notify the PDPC as soon as practicable, no later than 3 working days from the time it is aware of the data breach instead of the proposed 72 hours.

I am contactable at siewho.syn@qbe.com for any queries.

Best regards

A handwritten signature in blue ink, appearing to read "Syn Siew Ho".

Syn Siew Ho
2 August 2017