

Feedbacks

Discussions among attendees took place to understand scope of the “Data Portability Obligation”. Questions that need additional clarity:

- By and large, the PDPA and the proposed provisions apply to “personal data” that pertains to “individuals”, which is more relevant to retail/consumer banking in the context of Banking & Finance. As CUB Singapore Branch handles mainly corporate customers, to what extent does the “Data Portability Obligation” apply? e.g. personal data pertaining to Board members/authorised signatory(ies)?
- With respect to Q2 (b) in the Consultation Paper - the proposed scope of data that is subject to “Data Portability Obligation” include “user activity data”. Attendees in this meeting commented that such activity data may contain confidential information of the Bank, e.g. loan statement contain interest rates that vary among different customers which may involve commercial interest of the Bank – and hence can this be excluded from the scope?

Attendees also commented on challenges that the Branch may have when the obligation become effective:

- Is PDPC able to provide further clarify over the “commonly used machine-readable format”?
- Is ABS going to organize additional briefings to the Banking Industry on how banks can prepare for and implement these proposed provisions?