

Subject PDPC's Public Consultation on Proposed Data Portability and Data Innovation Provisions

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PART II: PROPOSED DATA PORTABILITY OBLIGATION

Consultation Question	Feedback, if any	Reference, if any
<p>Q2. What are your views on the proposed Data Portability Obligation, specifically – a) scope of organisations covered; and b) scope of data covered?</p>	<ul style="list-style-type: none"> • PDPC to provide exemption to the smaller company/set up from a need to comply with the data portability requirements due to the implementation/compliance cost. • PDPC to allow the banking industry to determine the type of information that can be shared including the transactions data. Based on the pre-set information, the guidelines should not allow the individual to request the FIs to remove the data as this may have impact to integrity of the data and cost of compliance to the request. 	<p>Section :Covered Organisation Para 2.16</p> <p>Section: Covered Data Para 2.22 Para 2.24 Para 2.26</p>
<p>Q4. What are your views on the proposed requirements for handling data portability requests?</p>	<ul style="list-style-type: none"> • The industry may need to consider establish a platform for the FIs to exchange information to ensure it is secured, standard process apply for submission and acknowledgement, standard format and less impact for the FIs to implement the requirement. • The guidelines should not allow the individual to request the FIs to remove the data as this may have impact to integrity of the data and cost of compliance to the request. • PDPC to provide baseline fee that the industry could charge the individual. 	<p>Section: Handling Data Portability Requests Para 2.37</p> <p>Para 2.37 (c)</p> <p>Para 2.37 (d)(i)</p>
<p>Q6. What are your views on the proposed binding codes of practices that set out specific requirements and standards for the porting of data in specific clusters or sectors?</p>	<p>Agree with PDPC on the proposed industry-specific code of practices to outline specific requirements and standard for the banking industry in consultation with regulator and the industry.</p> <p><u>Other</u> PDPC to provide sufficient time and milestones for the industry to adopt and implement the requirements</p>	<p>Section: Code of Practice Para 2.49</p>