

Hi PDPC officer,

Please see our responses below.

S/N	Question	Response
1	What are your views on the impact of data portability, specifically on consumers, market and economy?	Systems need to be enhanced to conform to a standard machine-readable format and a standard transmission method. The data exchange protocol and standard needs to be established as the whole industry has heterogeneous systems. If the industry is not using a standard machine-readable format, our organisation will need to perform a conversion in the format
2	What are your views on the proposed Data Portability Obligation, specifically – a) scope of organisations covered; and b) scope of data covered?	<u>b) Scope of data covered:</u> 1. PDPC should provide a list of data that can typically be ported by individuals 2. PDPC should consider establishing a list of sensitive personal data that should be exempted from the scope of data covered, for example: i. Financial information like credit card numbers, bank account information ii. Medical information like medical history, diagnosis iii. NRIC numbers
3	What are your views on the proposed exceptions to the Data Portability Obligation, specifically – a) the proposed exception relating to commercial confidential information that could harm the competitive position of the organisation, to strike a balance between consumer interests and preserving the incentive for first movers' business innovation; and b) the proposed exception for "derived data"?	No comments

4	What are your views on the proposed requirements for handling data portability requests?	<p>1. We propose that PDPC should provide guidance on the types of structured, commonly used and machine-readable format that organisations can use</p> <p>2. We also propose for PDPC to provide examples on the format of data portability requests</p>
5	What are your views on the proposed powers for PDPC to review an organisation's refusal to port data, failure to port data within a reasonable time, and fees for porting data?	No comments
6	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?	No comments
7	What are your views on the proposed approach for organisations to use personal data for the specified businesses innovation purposes, without the requirement to notify and seek consent to use the personal data for these purposes?	No comments
8	What are your views on the proposed definition of "derived data"?	No comments
9	What are your views on the proposal for the Access, Correction and proposed Data Portability Obligations not to apply to derived personal data?	No comments

Thank you.

