

**AMPLIFY HEALTH ASIA PTE. LIMITED'S COMMENTS ON THE PERSONAL DATA PROTECTION
COMMISSION'S PUBLIC CONSULTATION PAPER ON THE DRAFT PROPOSED ADVISORY GUIDELINES
ON USE OF PERSONAL DATA IN AI RECOMMENDATION AND DECISION SYSTEMS**

1. Amplify Health Asia Pte. Limited (UEN: 202207084R) (“**Amplify Health**”) thanks the Personal Data Protection Commission (“**PDPC**”) for providing it with an opportunity to give its comments on the draft Proposed Advisory Guidelines on Use of Personal Data in AI Recommendation and Decision Systems, as set out in the Public Consultation Paper issued by the PDPC (the “**Paper**”).
2. Amplify Health is a health technology service provider based in Singapore, and we seek to transform the healthcare space in Asia with the use of data analytics, artificial intelligence and machine learning.
3. Overall, Amplify Health is in full support of the Paper, and we welcome the PDPC’s continued efforts to provide guidance and clarity in this area.
4. For the purposes of submitting our feedback, we have organised our response according to the sections and paragraph sections detailed in the Paper. Kindly refer to **Annex A** of this document.
5. Amplify Health remains eager to engage the PDPC in further consultation or discussion in respect of any points the PDPC may wish to clarify further or to provide additional feedback. Any further queries in this regard may be directed to our Chief Data and Analytics Officer at David.Frankenfield@amplifyhealth.com, and our Senior Legal Counsel at Erin.Ang@amplifyhealth.com.
6. We look forward to hearing from you.

ANNEX A

Section/Paragraph of the Paper	Key Topic	Amplify Health's Feedback
Part II, Sections 5 – 6	Business Improvement and Research Exceptions	<p>Amplify Health welcomes and concurs with the inclusion of the business improvement and research exceptions to the use of personal data in AI recommendation and decision systems. This is especially helpful for organisations seeking to utilise personal data innovatively so as to improve and transform their products and services, and in turn, transform their respective industries.</p> <p>However, it is noted that the third line of paragraph 5.1 of the Paper states: <i><u>“Exception caters for sharing with related companies within a group of companies, as well as interdepartmental sharing of data within a company.”</u></i></p> <p>We would like to seek further clarity as to how the business improvement exception would apply to sharing of personal data with related companies within a group of companies.</p>
Part IV, Section 11	Obligations on service providers who are data intermediaries	<p>Section 11 appears to describe the standard obligations currently already imposed on data intermediaries generally.</p> <p>We would like to seek clarity as to whether there are any distinctions between the obligations of data intermediaries within and outside of the AI space.</p>