

Response to:

**PUBLIC CONSULTATION FOR APPROACHES TO MANAGING PERSONAL DATA IN THE DIGITAL
ECONOMY**

Organisation: AIA Singapore Pte Ltd

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S/N	Question	Response
1	Should the PDPA provide for Notification of Purpose as a basis for collecting, using and disclosing personal data without consent?	We support the proposal as there may be situations where it is impractical for the organization to collect consent.
2	Should the proposed Notification of Purpose approach be subject to conditions? If so, what are your views on the proposed conditions (i.e., impractical to obtain consent and not expected to have any adverse impact on the individual)?	We propose that the conditions should be either (a) or (b), not and .
3	Should the PDPA provide for Legal or Business Purpose as a basis for collecting, using and disclosing personal data without consent and notification?	We support the provision of Legal or Business Purpose.
4	Should the proposed Legal or Business Purpose approach be subject to conditions? If so, what are your views on the proposed conditions (i.e., not desirable or appropriate to obtain consent and benefits to the public clearly outweigh any adverse impact or risks to the individual)?	We support the provision of conditions for the Legal and Business Purpose approach.
5	What are your views on the proposed criteria for data breach notification to affected individuals and to PDPC? Specifically, what are your views on the proposed number of affected individuals (i.e., 500 or more) for a data breach to be considered of a significant scale to be notified to PDPC?	<p>We support the proposed data breach notification to affected individuals and to PDPC.</p> <p>There should not be a scale of data breach, instead it should be purely based on the risk of impact or harm to affected individuals. If there has to be a number threshold, we propose to have a number of 50000 or more, as 500 is far too low.</p>
6	What are your views on the proposed concurrent application of PDPA's data breach notification requirements with that of other laws and sectoral regulations?	We support the concurrent notification as this will reduce the effort in notification requirements.
7	What are your views on the proposed exceptions and exemptions from the data breach notification requirements?	No comment.
8	What are your views on the proposed time frames for data breach notifications to affected individuals and to PDPC?	No comment.