

**Re: ASIFMA response to the PDPC's Public Consultation on Approaches to Managing Personal Data in the Digital Economy**

BNP Paribas is pleased to respond to the Commission's consultation on this important review of approaches to managing personal data under the Personal Data Protection Act 2012 (PDPA).

We have set out in this letter our comments in response to the proposals in the paper. We welcome the opportunity for continued engagement with the Commission on this issue. If you have further questions or would otherwise like to follow up, please contact Lewis Loo, Legal Counsel, at [lewis.loo@asia.bnpparibas.com](mailto:lewis.loo@asia.bnpparibas.com) or +65 62101018.

Yours faithfully,

Lewis Loo  
Legal Counsel,  
BNP Paribas Singapore Branch

**Comments**

Q2: 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)?

**Response: We would like to seek clarity with regard to the following points:**

- 1. Paragraph 3.8: Could PDPC provide examples of circumstances where it is 'impractical for the organization to obtain consent'?**
- 2. Paragraph 3.9: Could PDPC provide examples of circumstances where it would be feasible to allow individuals to opt out of collection, use or disclosure and yet not obtain consent?**

Q4: 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)?

**Response: We would like to seek clarity with regard to the following points:**

- 1. Paragraph 3.15: If the benefits of using the data only accrue to a segment of customers, can the organization still rely on the Legal or Business Purpose bases?**

Q5: 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?

**Response: How is the figure of 500 derived by PDPC?**