



## RESPONSE TO CONSULTATION PAPER

<b>Consultation topic:</b>	Public Consultation on Approaches to Managing Personal Data in the Digital Economy
<b>Organisation:</b>	DP Credit Bureau Pte Ltd (DPCB)
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<b>Confidentiality</b>	
I wish to keep the following confidential:	Contact number and email address of Jennifer Lee.  <i>(Please indicate any parts of your submission you would like to be kept confidential, or if you would like your identity along with the whole submission to be kept confidential. Your contact information will not be published.)</i>



## General Comments

### **PART III: MANDATORY DATA BREACH NOTIFICATION**

**Question 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?**

#### DPCB Response

DPCB is supportive of the proposed criteria for data breach notification to PDPC only.

DPCB is an entity that carries on a credit reporting business and only collects limited data from the members, which are the banks. In the event of a known data breach, DPCB will inform the members immediately so that the members can proceed the necessary action for complying with the requirement under PDPA that includes the notification to the affected individuals.

**Question 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?**

#### DPCB Response

We would propose the PDPC to standardize the reporting format so that organizations do not need to complete different forms (i.e. incident reporting form) when notifying the respective authorities.

**Question 7: What are your views on the proposed exceptions and exemptions from the data breach notification requirements?**

#### DPCB Response

DPCB welcomes the proposed exception and exemption from the data breach notification requirements. We assume that PDPC will provide more guidance by issuing further guidelines on the list of exemption and exception within scope.



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**Question 8: What are your views on the proposed time frames for data breach notifications to affected individuals and to PDPC?**

DPCB Response

The proposed time frames for data breach notifications are reasonable and DPCB is able to notify PDPC within the proposed time frames.

**Conclusion**

In conclusion, DPCB welcomes the Mandatory Data Breach Notification proposed by PDPC with further guidance.

END