



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

Response:

There might be an increased responsibility on us to report both to our regulators and PDPC where there are notification requirements under sectoral regulations.

With reference to paragraph 6.6, apart from notifying PDPC and regulators, there will be an increased responsibility on a data intermediary to inform the contracting organization of a data breach. Presently, a data intermediary must protect personal data by making reasonable security requirements to prevent unauthorized access (and etc).

This may impose unnecessary burden and duplicated works on an institution, which is a MAS licensed intermediary and also an outsourced service provider, i.e. a data intermediary.

Conclusion:

We would suggest PDPC to have a centralized notification system, where such notifications do not need to be duplicated and it could be a one stop point for the financial institution to submit the notification to all parties.