

Question 1: No

Question 2: The proposed conditions are too skewed in favour of organisations and place little obligation on their part to even try to obtain consent or to determine if the collection, use or disclosure of personal data will not have any adverse impact on the individuals.

Question 3: Yes for legal purpose; No for business purpose.

Question 4: Businesses will not collect, use or disclose personal data for any public good but private profit. It is unrealistic to give them the power to determine if their collection, use or disclosure of personal data are for the greater public benefits that clearly outweigh any adverse impacts or risks to the individual.

Question 5: We support the proposed requirement for organisations to notify PDPA and the affected individuals in the event of data breach. We recognise that the proposed number of affected individuals before notification is mandatory is hard to fix, e.g. a small company may have a database of less than 500 customers. It may be that 500 be used as an initial figure to be reviewed in the future.

Question 6: We agree with PDPC's proposed approach.

Question 7: We agree with PDPC's proposed exceptions and exemptions.

Question 8: We agree with PDPC's proposed time frames for data breach notification to PDPC; however, we believe that a reasonable time frame for notification of data breach to affected individuals should be mandated by PDPA to ensure clarity.