

Annex B: Quotes from international organisations, associations, companies and law firms

<u>International Organisations</u>	
Ms. Joo-Ok Lee, Head of the Regional Agenda, Asia Pacific, World Economic Forum	“The endorsement of the ASEAN Data Management Framework and the ASEAN Model Contractual Clauses for Cross Border Data Flows today means that ASEAN is one step closer to the harmonization and interoperability of its regional data policy. Through the Digital ASEAN Initiative , the World Economic Forum was proud to convene multi-stakeholder experts under the Pan-ASEAN Data Policy Task Force that provided input to the Implementing Guidelines and the MCCs. We are pleased that many of the community’s feedback regarding the best practices on data classifications and existing cross-border data flows mechanisms have been reflected in the endorsed documents. We trust that these documents will contribute to empowering ASEAN businesses, particularly –SMEs, such that they can deploy innovative data-driven value creation models in full compliance with applicable data protection requirements. These developments are particularly timely and meaningful as we believe regional digital economy will serve as a key driver for ASEAN’s recovery from the COVID-19 pandemic.”
<u>Associations</u>	
Mr. Jared Ragland, Senior Director, Business Software Alliance	“BSA commends ASEAN’s efforts in developing the ASEAN Model Contractual Clauses (MCCs) as a voluntary data transfer mechanism. The MCCs provide useful guidance on important data protection aspects for companies to consider when drafting contractual terms and conditions surrounding the transfer of personal data. ASEAN’s work on the MCCs demonstrates the importance of promoting an internationally interoperable approach to data transfers and complements other data transfer mechanisms in use by enterprises throughout the region.”
AsiaDPO	“As a self-organising peer-to-peer community of Data Protection Officers, AsiaDPO (https://www.asiadpo.org/about) supports any effort by policy makers to make legal requirements and voluntary mechanisms for cross-border data transfers more compatible and interoperable, so that the compliance burden is made lighter for DPOs and their companies. The ASEAN MCCs will be part of a toolkit for DPOs when they are seeking to meet this challenge, and we encourage policy makers to also consider any undue cost to organisations of having to meet the challenge of differing and possibly conflicting transfer mechanisms in a global context.” <i>AsiaDPO is a Singapore registered society of a self-organising peer-to-peer community of Data Protection Officers (DPOs). We are committed to the development and advancement of data protection and privacy domains through a practice-led approach, serving as an expert group with a distinctive voice.</i>
Mr Lam Yi Young, CEO,	“The ASEAN Digital Data Governance Initiatives is a welcomed step in enabling Singapore companies to utilise digital data in their business operations with greater ease. A consistent regulatory framework across the region and standard contractual clauses will help reduce

Singapore Business Federation	<p>compliance costs and legal complexities for our companies. This will help facilitate the free flow of cross-border data, and enable businesses to innovate, scale, and serve customers across borders. The Singapore Business Federation looks forward to working with the Ministry of Communications and Information and the Infocomm Media Development Authority to help businesses leverage these initiatives and tap on the opportunities of ASEAN's digital economy, which is projected to be worth US\$300 billion by 2025."</p>
Companies	
Mr. Lam Chee Kin, Group Head of Legal, Compliance and Secretariat, DBS	<p>"Being mindful of predictions that ASEAN could be the world's fourth largest economy by 2030, and given the relative importance of data flows and trusted data frameworks to sustainable growth, we must applaud the effort to publish the ASEAN DMF and MCCs. Over time, efforts like this can make it easier to do business together, lower the cost of compliance, and increase customer trust in the way companies use and share data."</p>
Quek Siu Rui, CEO and co-founder, Carousell Group	<p>"Our users' privacy and ensuring the protection of our users' data within Carousell, and with our partners, are of utmost importance to us. As one of the world's largest and fastest growing marketplaces with six of our eight markets being in Southeast Asia, we are definitely excited about the ASEAN Digital Data Governance initiatives.</p> <p>Some challenges we have faced in Southeast Asia is that data protection laws and regulations can differ across jurisdictions and result in higher compliance costs. With the ASEAN leaders taking the lead to harmonise regulations, these initiatives will give Carousell the confidence and necessary safeguards to operate, grow in the region, and increase the awareness and education of the importance of good data management practices. This also allows Carousell to be heads-down focused on innovation and growth, instead of being tied down with ensuring compliance across different data protection regulations."</p>
Ms. Tenzin Norbhu, Director, Government Affairs & Public Policy, Google	<p>The ASEAN Digital Data Governance initiative is a strong example of ASEAN's leadership in international digital integration, and provides a strong framework for other parts of the world in harmonising different regulatory approaches. We're committed to developing the future of digital ecosystems in the region and applaud the efforts by ASEAN to develop practical guides that will come in handy for businesses that are keen to go digital and manage their data securely</p>
Mr. Antony Cook, Regional Vice President and Chief Legal Counsel, Microsoft Asia	<p>We welcome the effort by ASEAN member states to improve regulatory coherence in the region. ASEAN is a dynamic region for digital transformation, and stronger regulatory coherence will allow data to move across borders while ensuring privacy is protected. This will help unlock new opportunities for businesses across the region to innovate and grow, which is especially important for the COVID-19 economic recovery. The ASEAN Model Contractual Clauses contribute to this by providing non-binding guidance that helps increase interoperability between ASEAN privacy regulations. We especially welcome that the guidelines give flexibility to organisations across ASEAN to use the most</p>

	appropriate mechanisms for transferring data across borders, including the Model Contractual Clauses, or building on international standards like those developed in the International Standards Organisation (among others).
Legal Fraternity	
Jeffrey Lim, Chair of the Singapore Law Society Committee for Cybersecurity and Data Protection	“As Chair of the Singapore Law Society Committee for Cybersecurity and Data Protection, I am keen work with fellow committee members to promote awareness and discussion of the MCCs.”
Joyce A. Tan & Partners LLC	“We at Joyce A. Tan & Partners LLC are very encouraged and pleased to see the promulgation of, the ASEAN MCCs. We have been privileged to share a small part in the development of the MCCs and we feel strongly that, as with Standard Contract Clauses used in the EU, these standard form clauses are a sensible, efficient, and effective way to help businesses facilitate the transfer of data across borders. ASEAN is a burgeoning region of promise, and with her economies rapidly digitalising, the move towards MCCs for the region can only spur growth and help reduce doubt and fear from businesses who see the region for its potential. Whether you are a business who sees potential markets for customers, or a valuable network of supply chains or resources, the MCCs will help smooth the way for you regionalise and digitalise.”
Ms. Charmian Aw, Counsel, Reed Smith LLP	“We believe that the ASEAN MCCs will be very welcomed by businesses that either already have a digital presence in ASEAN or have plans to operate or expand in the region. They provide much needed legal and commercial certainty in what has otherwise been considered a particularly complex area of regulation.”
Ms. Stella Cramer, Co-Head of Intellectual Property and Technology Norton Rose Fulbright	Given rapid digitisation across the region and increased regulation of the use and transfer of personal data, compliance with the applicable regulatory frameworks can be challenging. The model clauses provide a practical solution to assist corporates across ASEAN to ensure they are transferring personal data in accordance with relevant requirements. We welcome the introduction of this additional tool and look forward to working with our clients on the adoption of these terms where appropriate