

## **Comments on Public Consultation Paper Issued By The Ministry Of Communications And Information And The Personal Data Protection Commission on 14 May 2020.**

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<b>Summary of major points</b>	
<ul style="list-style-type: none"> <li>• Refining the threshold and criteria on what constitutes “a significant scale” on the number of data breaches to commensurate the scale, size and complexity of different organisations.</li> <li>• Provide guidance on the information required for data breach reporting.</li> </ul>	
<b>Statement of interest</b>	<b>Comments</b>
Numerical threshold on what constitutes “a significant scale” in terms of the number of individuals affected in a data breach.	The proposed threshold of 500 or more individuals is too broad based and does not commensurate the scale, size and complexity of different organisations, especially for those with less than 500 individuals. We propose to consider refining the threshold such as (i) setting a percentage threshold based on the total number of individuals, or (ii) an absolute threshold (eg. 500 or more individuals), whichever is lower.
<p>Notify PDPC that the data breach meets the notification criteria.</p> <p>PDPA reference: New Part VIA NOTIFICATION OF DATA BREACHES.</p>	We would appreciate guidance on the information to be reported and the mode of notification (ie. email, web portal etc).
<b>Conclusion</b>	
We are generally supportive on the proposed amendments.	