



"Building trust in a connected world"

DP CREDIT BUREAU'S RESPONSES PROPOSED CONSUMER DATA PROTECTION ACT

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Presented by

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RESPONSE TO CONSULTATION PAPER ON PROPOSED CONSUMER DATA PROTECTION REGIME FOR SINGAPORE

1. Introduction

- 1.1 In September 2011, the Ministry of Information, Communications and the Arts conducted a consultation on the proposed consumer Data Protection ("DP") regime in Singapore. The DP concerns the regulation of the collection, use, disclosure, transfer and the security of personal data.
- 1.2 DP Credit Bureau (DPCB) have carefully considered the points put forward in the consultation paper and would like to provide the relevant feedback. The comments are set out below

2. Definition of Credit Bureau

- 2.1 There were 3 references [Pts 3.36, 3.46, 3.68] made to a credit bureau in the consultation paper. As one of the credit bureau that the Monetary Authority of Singapore ("MAS") has recognised under Banking Act (Chapter 19), we would like to seek a clearer definition of a credit bureau and the boundaries of its operation.
- 2.2 Some ambiguities on the prioritisation of consent have been observed in Pt. 3.36 and Pt. 3.46 where the seniority or subordination of a consumer's or organisation's consent needs to be clarified.
- 2.3 For example, when a lending organisation, who is a member of the credit bureau, has obtained prior consent from a consumer to load his/her personal information, can the individual consumer exercise his/her right within the DP Act to withdraw the personal consent. Would such an action be deemed as 'frustrating the performance of a legal obligation'?

3. General Exclusions

DPCB seeks to understand if the requirements of the DP Act should be held above or below those found within the Banking Act. Conversely, should there be any circumstances under which the DP Act will not apply to the collection, use and disclosure of personal data related to the Banking Act?

4. Conclusion

As an information provider in Singapore, DPCB welcomes the introduction of the DP Act which will increase a more robust governance of critical data and information that may face growing abuse in this digital age.

Presently, DPCB is an ISO 270001 certified organisation and prides itself with the ability to manage data and information securely. With the impending imposition of the DP regime, we are confident that there are necessary measures and processes within us to meet the new compliance requirements.