

From: Charis Mun
To: MICA DP Bill Consultation (MICA)
Subject: Public Consultations re Proposed Data Protection Framework

My major concerns is regarding the requirement and use of NRIC by certain entities. It had become way too common for building managements, shopping centers and particularly beauty solons to require the production of NRIC respectively for entry, gift redemption and just for a session of facial respectively. Apart from the intrusion of an individual's privacy, there is a high risk of abuse, particularly when insufficient measures were taken in safeguarding the information collected. For example, a customer's NRIC stored in the computer of a beauty salon is easily available to all their staff. Some of these entities also scan the NRIC. Information on the NRIC can be used for a variety of purposes, including changing of SingPass, particularly if the date of birth and date of issue are available.

I suggest that any entity requiring a person's NRIC, be it a copy or the number, be required to provide a written undertaking to the person whose data is being collected, outlining the measures in place to ensure that the information is only used for the purpose specified and an indemnity in the event of any abuse (including as a result of fraud by their staff or agent). A building management requiring the deposit of NRIC in exchange for a pass should be fully responsible in the event of loss while in their possession. A format for such undertaking and indemnity can be included in the legislation.

Alternatively, the collection of NRIC details should only be permitted for entities subject to regulations eg banks and telcos. Any other entities seeking to collect such information should make an application to the authorities for approval prior to doing so. There is no reason why a beauty salon need my NRIC details just for me to have a facial done. Neither should NRIC details be required to redeem a gift at a shopping center after original receipts evidencing the minimum spending to qualify for the gift had been produced.

In addition, you may like to note that many organizations requiring NRICs are making baseless claims to consumers that this is done pursuant to government's regulations. This had happened in my experience with [redacted], who had made such claims but were unable to back up their claims. A copy of my email correspondence with them is enclosed for your information.

Regards
Charis Mun