

Date: 27 May 2020

To: The Ministry of Communications and Information &  
The Personal Data Protection Commission (“**MCI/PDPC**”)

BY EMAIL TO  
DataRegulation@mci.gov.sg

Dear Sirs,

## **PUBLIC CONSULTATION FOR THE PDP (AMENDMENT) BILL**

1. We, Bank of China Limited, Singapore Branch (“**BOC**”) refer to the Consultation Paper (the “**Paper**”) issued by the MCI/PDPC on 14 May 2020 relating to the draft Personal Data Protection (Amendment) Bill, including related amendments to the Spam Control Act (the “**Bill**”).

2. We note that MCI/PDPC has in the Paper requested for comments on the Bill. Accordingly, BOC would like to seek clarification on the following two points raised under or in connection with the Paper:

### **(1) How new technologies would affect our obligations as a bank under the bill:**

We understand that MCI/PDPC has made reference to the Internet of Things (“**IoT**”) technology in the Paper. Normally when it comes to IoT, we only focus on the device's information such as "MAC address", "system version", etc. Accordingly, could MCI/PDPC please clarify what kind of IoT information would be considered as personal data?

### **(2) How separate initiatives by other governmental agencies would affect data protection obligations generally:**

We understand that the new Bill is intended to address how technological advancements affect sharing of data and data portability, including to introduce a new Data Portability obligation. This being said, we note that separate initiatives have been undertaken by other governmental agencies such as the Monetary Authority of Singapore (“**MAS**”) and the Association of Banks in Singapore (“**ABS**”) relating to data sharing.

For instance, there will be a collaboration with the Ministry of Manpower (“**MOM**”) to facilitate account-opening process for migrant workers, we understand that an online portal will be developed that will enable banks to access personal information of foreign workers such as their passports, work permit and other information to assist in account-opening. However, we also understand from the MAS that not all banks are being involved in this collaboration with MOM to open accounts for foreign workers. Accordingly, what is the MCI/PDPC's view regarding such separate initiatives, and how would the MCI/PDPC ensure that data

protection obligations (including those under the Bill) would be met across the board?

3. For more information or clarification, you may contact our Data Protection Officer, Mr. Lam Yan Hong, at email: [bocdp\\_sg@mail.notes.bank-of-china.com](mailto:bocdp_sg@mail.notes.bank-of-china.com).
4. Thank you.

Yours Faithfully,  
For and on behalf of  
**Bank of China Limited, Singapore Branch**