

PUBLIC CONSULTATION FOR THE PDP (AMENDMENT) BILL

PERSONAL DETAILS

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COMPANY DETAILS

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Appointment: Data Protection Officer

Summary of Major Points

I am writing this feedback to MCI / PDPD based on the proposed format and will attempt to write it as simply and clearly as possible.

Having managed an SME on my own and having interacted with several SME owners and managers, I have noticed that many SMEs are still not taking active steps to implement data protection practices and even if they do, they do it out of requirement and not necessary out of commitment. I believe it can be attributed to the

- Culture (relating to attitude toward importance or personal data)
- Conventional practices (of how things have been done)
- Organizational structure and demographics (relationships, age, education, etc.)

I recognise a lot has been done to help with the amount of information available on PDPC and especially with reorganization of website to make it more searchable, I just hope for more to help SMEs and individual freelancers and self-employed professionals.

Strengthen the Accountability

Good to strengthen accountability especially for companies who deal with big data. Suggestions for good practices for accountability will be useful especially if it can even have sectorial guidelines created through industrial associations, cooperatives, NGOs and even governmental organisations.

Enable Meaningful Content

This seems to me like an initiative by PDPC to encourage ethical collection of data. This is a move that is certainly due and should be strongly encouraged.

Greater Consumer Autonomy

No comments and fully support the amendments for greater consumer autonomy.

Strengthen PDPC's Enforcement Efforts

I have mixed feelings over the stronger enforcements and more severe penalties. While the stronger enforcement will generate better compliance among organisations, it might likely be done because of the need to comply, more need to be done to encourage or motivate organisations to comply with PDPA and even apply ethical collection of data because it is the right thing to do.

I am also concerned by the SMEs who are really and truly not ready for data protection, especially the more traditionally run SMEs who are just starting to start moving into

the digital space and due to Covid-19, may have been forced into going digital. A stronger enforcement may hit these SMEs hard upon breach.

Yet, a stronger enforcement is most welcome because I have heard comments from people that personal data protection is not important. A can of worms I might open by sayings this but I will write it anyway... PDPA mostly enforces organisations (companies) and not individuals who may be the data handler who might have caused the breach for careless or worse malicious reasons, thus the data handler may go scot free.

Statement of Interest, Comments and Conclusion

Protection of Personal Data is certainly important aspect and I applaud PDPC / MCI for this. There are two major trust in my feedback. One is how to help SMEs, especially traditional ones, to comply and comply because they want to do so; the other is to promote education.

SMEs need more help to comply and I am proposing industry sectors to develop some good practices that may later be used to be best practices in the near future.

I personally feel that education is important and is probably one of the most fundamental in promoting how to do things right (compliance) and to do the right things (ethics). I will like to advocate education of personal data protection and cyber security and safety from secondary school and even in primary school. I started my career as a teacher and even served the public schools in enrichment and I feel we need to start some of these in the curriculum so that we educate the young and those who are already working in organisations that personal data and cyber safety are important.