



**PROPOSED ADVISORY GUIDELINES ON THE PERSONAL DATA PROTECTION ACT FOR
NRIC NUMBERS**

National Registration Identification Card (“NRIC”)

- 1.1 The National Registration Identification Card (“NRIC”) number comprises a unique sequence of numbers and letters of the alphabet issued to each lawful resident of Singapore (other than certain excluded persons) under the [National Registration Act](#). The NRIC number of an individual is considered personal data as the individual can be identified from the unique sequence of numbers and letters. Organisations that collect NRIC numbers of individuals will have to comply with the Data Protection Provisions under the PDPA.
- 1.2 The NRIC number is a unique identifier assigned by the Government to each Singapore resident that is often used as a required document or identifier for transactions with the Government, as well as certain commercial transactions. As the NRIC number is a permanent and irreplaceable identifier which can be used to unlock large amounts of information relating to the individual, the indiscriminate collection and use of individuals’ NRIC numbers is of special concern as it increases the risk that the NRIC numbers may be obtained and used for illegal activities such as identity theft and fraud.
- 1.3 The collection of an individual’s physical NRIC, or a copy of it, is also of concern. The physical NRIC not only contains the individual’s NRIC number, but also other personal data, such as the individual’s full name, photograph, thumbprint and residential address.
- 1.4 This chapter clarifies how the PDPA applies to the collection, use or disclosure of NRIC numbers, physical NRICs or a copy of the NRIC by organisations. Similar treatment may apply to other unique identifiers and identification documents (e.g. passport and passport numbers).

Can organisations collect, use or disclose an NRIC number or a copy of the NRIC?

- 1.5 In general, organisations should not collect, use or disclose an individual’s NRIC number or a copy of the NRIC, except in the following circumstances:
 - a) Collection, use or disclosure of the NRIC number or copy of the NRIC is required under the law; or
 - b) Collection, use or disclosure of the NRIC number or copy of the NRIC is necessary to accurately establish and verify the identity of the individual.

Collection, use or disclosure of the NRIC number or copy of the NRIC is required under the law

- 1.6 Organisations can collect, use or disclose individuals' NRIC numbers, or copy of the NRIC, without their consent if it is required under the law¹. Nonetheless, as good practice, organisations should notify the individual of the purpose for the collection, use or disclosure of his NRIC numbers or copy of the NRIC. Organisations must also ensure that there are adequate security arrangements to prevent any unintended disclosure of the NRIC number, including during the process of making a copy of or recording the NRIC number, and to protect copies of the NRIC kept by the organisation.
- 1.7 The following are some examples of situations where the collection, use or disclosure of NRIC numbers or copies of the NRIC may be required under the law.

1.8	<p>Example: Seeking medical treatment at a General Practitioner clinic</p> <p>Siti would like to seek medical treatment at a General Practitioner clinic. The clinic requires Siti to provide her NRIC for documentation when she registers with the clinic as a patient, for the purpose of identifying her and maintaining accurate, complete and up-to-date medical records.</p> <p>All healthcare institutions need to carry out proper documentation and accurate verification of a patient's identity to ensure that medical care and treatment is provided to the right patient. The requirement to maintain accurate, complete and up-to-date medical records for the purposes above is supported by regulations 12(1) and (1A)(a) of the Private Hospitals and Medical Clinics Regulations.</p> <p>Accordingly, the General Practitioner clinic may obtain the information contained in Siti's NRIC where it is required for compliance with the regulations.</p>
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¹ Section 13(b) of the PDPA provides that an organisation shall not collect, use or disclose personal data unless with the individual's consent or if the collection, use or disclosure without consent is required or authorised under the PDPA or any other written law. Section 4(6) of the PDPA states that unless otherwise provided in the PDPA, nothing in Parts III to VI of the PDPA shall affect any authority, right, privilege or immunity conferred, or obligation or limitation imposed, by or under the law, including legal privilege, except that the performance of a contractual obligation shall not be an excuse for contravening the PDPA, and the provisions of other written law shall prevail to the extent that any provision of Parts III to VI is inconsistent with the provisions of that other written law.

1.9	<p>Example: Enrolling into a child care centre</p> <p>Samuel and Brenda wish to enrol their child at Child Care Centre XYZ. Child Care Centre XYZ requires Samuel and Brenda to provide a photocopy of their child's birth certificate as well as a photocopy of their NRICs when registering their child with the centre.</p> <p>Under regulation 20 of the Child Care Centres Regulations, child care centres are required to collect a photocopy of the child's birth certificate in addition to relevant documentary evidence of the identity and status of the child's father and mother (e.g. nationality, employment status).</p> <p>Accordingly, Child Care Centre XYZ may obtain the photocopies of their NRIC, as well as their child's birth certificate for compliance with the regulation.</p>
1.10	<p>Example: Checking into a hotel</p> <p>Charlotte has booked a room to stay at Hotel ABC. Hotel ABC requires Charlotte to provide her NRIC number upon check-in as a record of her identity.</p> <p>Under regulation 27(1)(b) of the Hotels Licensing Regulations, hotels must require every guest seeking accommodation in the hotel to furnish the particulars of any identity card, passport or other travel document held by the guest. Regulation 27(2) further provides that every guest must furnish such particulars when required to do so by the hotel.</p> <p>Accordingly, Hotel ABC may obtain Charlotte's NRIC number where it is required for compliance with the regulation.</p>
1.11	<p>Example: Subscribing to a mobile telephone line</p> <p>Shankar would like to sign up for mobile phone service with Telecommunication Company ABC. Telecommunication Company ABC requires Shankar to provide a photocopy of his NRIC when signing up for the mobile phone subscription as it needs to maintain a register of subscribers as required under its licence conditions for the provision of mobile services.</p> <p>Condition 6.3(a) and 9.4 of the mobile virtual network operation service schedule under the services-based operator licence issued under S(5) of the Telecommunications Act requires telecommunication companies to collect their customers' NRIC information, among other documents.</p>

	In this case, Telecommunication Company ABC may obtain a photocopy of Shankar's NRIC for compliance with the licence conditions.
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Collection, use or disclosure of the NRIC number or copy of the NRIC is necessary to accurately establish and verify the identity of the individual

- 1.12 Where the collection, use or disclosure of the NRIC number or copy of the NRIC is not required under any law, an organisation should generally only do so in circumstances where it is necessary to accurately establish and verify the identity of the individual to a high degree of fidelity.
- 1.13 Circumstances which PDPC would consider necessary to accurately establish and verify the identity of individuals include situations or transactions where verification is necessary to prevent a risk of significant harm or impact to the individual and/or the organisation, for example entering into high value contracts such as property transactions, and applications for healthcare or travel insurance to prevent fraudulent claims. In such circumstances, it may also be considered reasonable to require consent to collect, use or disclose the individual's NRIC number to accurately establish and verify the identity of individuals², unless there is an applicable exception under the Second, Third or Fourth Schedule of the PDPA and consent is not required, as illustrated in the following example.

1.14	<p>Example: Disclosure of personal data without consent in an emergency situation</p> <p>Ahmad, an elderly client at Day Care Centre ABC, becomes unconscious after sustaining a fall at the centre and has to be admitted to hospital. Sarah, a staff at the Centre, provides the hospital staff with Ahmad's personal data including his name, NRIC number and medical allergies, without Ahmad's consent as there is an applicable exception³ in the Fourth Schedule of the PDPA for the disclosure of an individual's personal data, without consent, that is necessary to respond to an emergency that threatens his health.</p>
1.15	<p>Example: Collection of NRIC numbers for entry into secured building</p> <p>Building Management DEF assesses that it is necessary to accurately establish the identity of every visitor entering the building for security purposes to prevent a risk of harm or impact to the tenants. Building</p>

² Section 14(2)(a) provides that organisations must not, as a condition of providing the product or service, require the individual to consent to the collection, use or disclosure of his personal data beyond what is reasonable to provide the product or service.

³ Paragraph 1(b) of the Fourth Schedule of the PDPA.

	Management DEF scans the physical NRICs of visitors to record their NRIC numbers. DEF, in collecting visitors' NRIC numbers for this purpose, will have to comply with the obligations in the PDPA, such as the obligation to make reasonable security arrangements to protect the NRIC numbers from unauthorised disclosure.
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What alternatives should organisations use in place of NRIC numbers or copy of the NRIC?

- 1.16 PDPC does not prescribe the types of identifiers that organisations should adopt in place of NRIC numbers or copy of the NRIC; organisations should assess the suitability of alternatives based on their own business and operational needs. Some alternatives that have been adopted by organisations include organisation/user-generated ID or password, tracking number, organisation-issued QR code, or monetary deposit. Organisations should also consider whether the alternatives provided are reasonable, and avoid collecting excessive personal data as an alternative to the individual's NRIC numbers or a copy of the NRIC.
- 1.17 The following examples illustrate scenarios where the collection, use or disclosure of NRIC numbers or a copy of the NRIC is not required under any law, and some alternatives that organisations can consider adopting:

1.18	<p>Example: Redemption of free parking</p> <p>Mall XYZ allows shoppers who spend a minimum of \$100 at the Mall to make a redemption for free parking. Mall XYZ intends to keep a record of the identity of shoppers who make the redemptions in order to limit the number of redemptions that can be made by each shopper.</p> <p>Mall XYZ should not collect shoppers' NRIC numbers for this purpose. Mall XYZ could consider other appropriate means of limiting the number of redemptions that can be made by each shopper, for example by recording shoppers' vehicle numbers or mobile phone numbers.</p>
1.19	<p>Example: Online purchase of movie tickets</p> <p>Cinema XYZ intends to verify the identity of customers who purchase movie tickets online when they collect the movie tickets, to ensure the tickets are issued to the right customers.</p> <p>Cinema XYZ should not collect the NRIC numbers of customers for this purpose. Cinema XYZ could consider other appropriate means of verification,</p>

	such as issuing customers a booking reference number or an SMS confirmation.
1.20	<p>Example: Signing up for retail membership and lucky draw</p> <p>Retail Store ABC wishes to create an unique identifier for each customer who signs up for its membership programme for the purpose of managing the customer's membership account and reward points.</p> <p>Retail Store ABC may wish to allow its members to use another identifier (e.g. email address) or a store generated identifier for establishing and verifying their identities.</p> <p>Retail Store ABC also wishes to conduct a lucky draw for its customers. ABC collects the full name and contact information (e.g. email address) of participating customers for the purpose of contacting the winners of the lucky draw, and verifies the identities of the winners coming forward to claim the lucky draw prizes by checking their full names in their identification documents.</p>

Can organisations retain individuals' physical NRICs?

- 1.21 Where an organisation retains an individual's physical NRIC or copy of the NRIC, the organisation is considered to have collected all the personal data on the physical NRIC, and is subject to the Data Protection Provisions of the PDPA in respect of that collection. The organisation should assess whether it is collecting excessive personal data contained in the NRIC for the purpose.
- 1.22 In general, organisations should not retain an individual's physical NRIC unless required under the law, or where it is necessary to accurately establish and verify the identity of the individual. To be clear, even if an organisation temporarily retains an individual's physical NRIC (e.g. as collateral) without recording any personal data contained in the NRIC, PDPC generally considers the organisation to have collected all the personal data in the NRIC, for the duration the physical NRIC is in the possession or under the control of the organisation. Hence, organisations are to comply with the obligations under the PDPA, such as the obligation to make reasonable security arrangements to protect the personal data in its possession or under its control from unauthorised disclosure, if it collects an individual's physical NRIC or a copy of the NRIC.

1.23	Example: Renting a bicycle Bicycle Rental Company ABC wishes to collect some form of collateral from its customers to ensure that they would return the rented bicycles. Keeping in mind the collection of all the personal data contained in the physical NRICs would be beyond what is necessary for this purpose, and that any loss of customers' physical NRICs would pose significant risks for its customers, Rental Company ABC should not retain customers' physical NRICs. It could consider using other forms of collateral, such as a monetary deposit of a reasonable amount, for the rental of bicycles.
1.24	Example: Issuance of visitor badges Building Management XYZ wishes to ensure that the visitor badges issued to visitors entering the building are returned to XYZ after the visit. XYZ currently retains physical NRICs from visitors in exchange for visitor badges. However, keeping in mind the collection of all the personal data contained in the physical NRICs would be beyond what is necessary for this purpose, and that any loss of visitors' physical NRICs would pose significant risks for the visitors, XYZ should not retain visitors' physical NRICs. Instead, XYZ may wish to take down the contact details (e.g. mobile phone number) of the visitors or consider other means of ensuring the visitor badges are returned, such as designating a single point of exit for visitors to return the visitor badges before leaving the premises. To be clear, even if XYZ had collected the visitors' NRIC numbers as part of establishing their identity (see example at paragraph 1.15), XYZ should not retain visitors' physical NRICs for the purpose of ensuring the return of the visitor badges.

1.25 In certain circumstances, an organisation may merely have sight of an individual's physical NRIC and the information on it for verification purposes. PDPC may consider that there was no intention to obtain control or possession of the physical NRIC in these circumstances and hence may not consider it a collection or retention of personal data on the physical NRIC.

1.26	Example: Checking of physical NRIC for sale of cigarettes Damien would like to purchase a packet of cigarettes at Convenience Store ABC. At the point of sale, the cashier at the Store requests to see Damien's NRIC in order to determine if he meets the minimum legal age for the purchase of tobacco. In this case, as there are no other viable alternatives for verifying his age,
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	Convenience Store ABC may require Damien to produce his physical NRIC to verify his age.
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Other Data Protection obligations

- 1.27 The Data Protection Provisions contain a number of obligations requiring organisations to develop and implement policies and practices that are necessary for the organisations to meet their obligations under the PDPA. Given the risks and potential consequences of unauthorised collection, use or disclosure of personal data associated with the individual's NRIC number, organisations are advised to regularly review their policies and processes to ensure that security arrangements are adequate in protecting NRIC numbers or physical NRIC (or copy) in their possession or under their control.
- 1.28 The Data Protection Provisions also require organisations to cease to retain documents containing personal data, or to remove the means by which the personal data can be associated with particular individuals, as soon as the purpose for which the personal data was collected is no longer served by the retention of the personal data, and retention is no longer necessary for business or legal purposes. Please refer to the Key Concept Guidelines for more details on the Openness, Protection, and Retention Limitation Obligations as well as other Data Protection Provisions that organisations are required to comply with.
- 1.29 PDPC is cognisant that organisations may require some time to review existing business practices and implement operational changes to use other identifiers or forms of collateral in place of NRIC numbers, physical NRIC or copies of the NRIC. Organisations will have a period of 12 months from the issuance of these advisory guidelines to review and implement the necessary changes to its policies and processes on the collection, use or disclosure of NRIC numbers, physical NRIC or copies of the NRIC.

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