

**PROPOSED REGULATIONS ON PERSONAL DATA PROTECTION
IN SINGAPORE**

GENERAL INSURANCE
ASSOCIATION OF SINGAPORE
180, CEDIL STREET #07-02
CENTRAL BUILDING
SINGAPORE 0495346
T : (65) 6221-8788
F : (65) 6227-2101
E : FEEDBACK@GIA.ORG.SG
WWW.GIA.ORG.SG
UEN: S44530020



19 March 2013

To: Personal Data Protection Commission (PDPC)
Of Singapore

Dear Sir / Madam,

**PUBLIC CONSULTATION ON THE POSITIONS PROPOSED FOR
THE REGULATIONS & GUIDELINES TO BE MADE UNDER THE
PDPA**

Reference is made to the above public consultation dated 5 Feb 2013.

GIA has worked with its Telemarketing Workgroup headed by Mr Mack Eng to compile the industry feedback and responses on the public consultation exercise launched by the PDPC. See the attached ANNEX A.

Please do not hesitate to contact us at 6221 8788 if you require any clarification.

Yours sincerely,

Glorson Lum
GIA Secretariat

1. In relation to the administration of requests for access to and correction of personal data, do you have any views/comments on the proposed manner in which an individual may make an access or correction request or the proposed positions relating to how organizations are to respond to such requests?

No further views on the proposed approach. Organisations will respond to such customers' requests based on their operating procedures and processes.

2. In relation to the transfer of personal data outside Singapore,

- a) Do you have any views/comments on other means of ensuring the protection of personal data transferred out of Singapore?

No further views on the proposed approach.

- b) Do you have any views/comments on the proposed requirements for contractual clauses and binding corporate rules to protect personal data transferred out of Singapore?

No further views on the proposed approach.

3. In relation to individuals who may act for others under the PDPA,

- a) Do you have any views/comments on the areas for which individuals may act for other individual under the PDPA that should be prescribed?

No further views on the proposed approach.

- b) Do you have any views/comments on the extent to which minors should be able to exercise rights and powers conferred on them under the PDPA?

It is not feasible for companies to assess if those in this age segment (between 14 to below 18) understand the nature of the right or power, and the consequences of exercising the right of power. Companies would prefer to have a specified cut-off age for certainty of administration. Perhaps PDPC can decide on the cut-off age.

- c) Do you have any views/comments on the minimum age below which individuals should exercise their own rights and powers under the PDPA?

Recommend we adhere to legal age to contract to minimize service issues or situations.

- d) Do you have any views/comments on the proposed priority list in relation to individuals that may act for deceased individuals?

ANNEX A

This should be confined to the administrator of the estate as such priority listing can give rise to disputes (e.g. as the organisation will not be aware of family sensitivities, conflicts etc).

e) Do you have any views/comments on the appropriate priority list and/or whether priority should be given equally to all relatives (or to relatives within certain categories such as spouse and children, parents and siblings, etc) for the purpose of the PDPFA?

As above, this should be confined to the administrator of the estate as such priority listing can give rise to disputes (e.g. as the organisation will not be aware of family sensitivities, conflicts etc).

~~~~~ END ~~~~~