

PDPC's Public Consultation on the Proposed Revised Advisory Guidelines on NRIC Numbers

Submitted by:

AIG Asia Pacific Insurance Pte. Ltd.

Contact persons:

Ms Lim Bee Lee
Data Protection Officer
DID: 6419-1653
Bee-Lee.Lim@aig.com

Ms Priscilla Soh
General Counsel
DID: 6419-1042
Priscilla-KT.Soh@aig.com

Question 1: What are your views on the proposed criteria for limiting the collection, use or disclosure of individuals' NRIC numbers or copies of the NRIC to instances where:

(a) it is required under the law; and

(b) it is necessary to accurately establish and verify the identity of the individual?

AIG:

We agree with the rationale behind the proposed criteria for limiting the collection, use or disclosure of individuals' NRIC numbers or copies of the NRIC to the instances set out above. As an insurer, the above criteria will apply to us as we will need to collect, use and disclose individuals' NRIC numbers for the purposes of know-your-client (KYC), anti-money laundering (AML) and sanctions screening.

Question 2: What are your views on the proposed criteria for limiting the retention of individuals' physical NRIC to instances where:

(a) it is required under the law; and

(b) it is necessary to accurately establish and verify the identity of the individual?

AIG:

We agree with the proposed criteria for limiting the retention of individuals' physical NRIC to the instances set out above.

Question 3: Are there common scenarios or additional issues (e.g. updating of information systems) that these advisory guidelines should address?

AIG:

We would like to find out to what extent the PDPC requires organizations to implement such changes, bearing in mind that some may be extremely costly to implement. For example, will it be sufficient if the organization has in place system security protocols, controlled access rights, and clear information handling policies which comply with the PDPA?

Question 4: What are your views on the proposed provision of up to one year from the issuance of the advisory guidelines for organisations to review and implement changes to their practices and processes involving the collection, use or disclosure of NRIC numbers or copies of the NRIC, or the retention of physical NRIC?

AIG:

We are of the view that one year is too short for organizations to review and implement changes to their practices and processes. This will most likely necessitate changes to existing IT platforms and systems, many of which may be interdependent on each other. We believe that a provision of 18-24 months from the issuance of the advisory guidelines is more reasonable.