

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

SUBMISSION OF COMMENTS

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Clarifications required on the consultation paper

<u>Paragraphs from the consultation paper requiring clarification</u>	Questions / Proposals
<p>Proposed Advisory Guidelines on the Personal Data Protection Act for NRIC Numbers</p>	
<p>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.</p>	<p>(1) We would like to seek clarification on whether the following situations are considered valid circumstances where organisations could collect, use or disclose NRIC to accurately establish and verify the identity of individuals:</p> <p>(a) Online form for our customers to provide feedback or ask queries. Customers usually will not remember the policy number and name may not be a unique identifier for some common names. Thus, it is necessary for us to accurately identify the customer before we could look into the feedback and enquiry.</p> <p>(b) Similar to point (a), customers would also walk in to customer service hall to provide feedback or perform transactions. Thus, it is necessary for us to accurately identify the customer before we could look into the customer’s request.</p> <p>(c) Perform outbound servicing call to our customers to ask for further information. We need to verify the identity of the customer before we can take</p>

	instruction from customer over the phone.
Proposed Technical Guide To NRIC Advisory Guidelines	
The NRIC number of an individual is considered personal data as it can be used to identify the individual, and can be used to access large amounts of information relating to the individual, such as the individuals' name, address, contact numbers, income information and health information. Organisations should thus avoid the use of NRIC numbers as user names or unique identifiers in their applications, websites or public facing systems.	We have many public facing systems such as claim administration system and online portal for customers to access their portfolios which uses NRIC as user name. It is necessary for us to accurately identify the customer before they can log in to the system. Thus, we would to seek clarification as to whether for such systems, these could fall under the circumstances allowed under para 1.13.
Public Consultation for Proposed Advisory Guidelines on the Personal Data Protection Act for NRIC Numbers	
2.4 The Commission is cognisant that organisations may require some time to review existing business practices and implement operational changes to adopt alternatives in place of NRIC numbers, physical NRIC or copies of the NRIC. The Commission is thus proposing to allow organisations a period of up to 12 months from the issuance of the revised advisory guidelines, to review and implement the necessary changes to its practices and processes involving the collection, use or disclosure of NRIC numbers, physical NRIC or copies of the NRIC.	We have quite a number of public facing systems that uses NRIC as user name. We would like to propose to the Commission to consider allowing organisations a longer time period (18 or 24 months from the issuance of the revised advisory guidelines) to review and implement the necessary changes.