

a) Cover page

Consultation topic	PUBLIC CONSULTATION FOR PROPOSED ADVISORY GUIDELINES ON THE PERSONAL DATA PROTECTION ACT FOR NRIC NUMBERS
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b) Summary of major points

- AXA Singapore (AXAS) primarily collects NRIC to establish and verify the identity of an individual.
- AXAS has systems in place that uses NRIC as a unique identifier. We have assessed that it's necessary to use NRIC as an identifier as these systems deal with the servicing of customer's insurance policies/claims.

c) Comments to questions

<p>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</p>	<p>AXAS collects/uses/discloses/retains NRIC as we consider it necessary to accurately establish and verify the identity of individuals in order to prevent significant harm or impact to the individual and/or organisation.</p> <p>e.g.: issuance of insurance policy, servicing of insurance policy, claims, policy renewal</p>
<p>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?</p>	<p>AXAS collects/uses/discloses/retains NRIC as we consider it necessary to accurately establish and verify the identity of individuals in order to prevent significant harm or impact to the individual and/or organisation.</p> <p>e.g.: issuance of insurance policy, servicing of insurance policy, claims, policy renewal</p>
<p>Question 3: Are there common scenarios or additional issues (e.g. updating of information systems) that these advisory guidelines should address?</p>	<p>We note in point 1.13 of the Proposed NRIC Advisory Guidelines that applications for travel insurance are circumstances where collection of an individual NRIC's is deemed necessary, and we would concur with this statement. We would seek to extend this to the purchase of all types of insurance as we deem it necessary to correctly identify our customers.</p> <p>The Advisory also notes that applications for health care are also scenarios where collection of NRIC is necessary. Aligned with this, we would deem it necessary to request NRIC for health insurance policies to reduce the risk of fraud, as we match the NRIC with the health care provider in paying claims.</p> <ol style="list-style-type: none"> 1. We would like to see the Advisory Guidelines extended to note that collection of NRIC is deemed necessary for purchases of all insurance types, and not limited to travel insurance, so as to properly identify individuals and reduce the risk of errors in processing and importantly, fraud. 2. By extension, we would like to see the Advisory Guidelines extended to note that collection of NRIC is deemed necessary for verification of the individual in ongoing servicing of the policies they hold with us, and not limited to point of purchase. We need

	<p>to verify the identity of a customer whenever they contact us, either with a query, a servicing request or to lodge a claim, to ensure we correctly identify the customer in our records.</p>
<p>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?</p>	<p>No further comments.</p> <p>However, if changes to system login is needed (i.e. unable to use NRIC as user id), then we anticipate that more time would be needed to implement these changes.</p> <p>There are a number of systems and policyholders involved and hence, one year would not be feasible.</p>

d) Conclusion

AXAS identified processes that involves the use of NRIC. Based on our assessment, we concluded that the collection/use/disclosure/retention of NRIC is needed to accurately establish and verify the identity of individuals for most of our processes.

We are of the view that for the insurance industry and its related processes, it is necessary to verify the identity of individuals to a high degree of fidelity.