

18 December 2017

**Personal Data Protection Commission**

(via email: [corporate@pdpc.gov.sg](mailto:corporate@pdpc.gov.sg))

Dear Sir / Madam,

**Public Consultation for Proposed Advisory Guidelines on the Personal Data Protection Act for NRIC Numbers**

We refer to the above-mentioned Public Consultation dated 7 November 2017 and wish to submit our views on the proposed enhanced framework.

Please find our feedback in the Annex below for your consideration.

Thank you.

Yours sincerely,

Eileen Ho  
Data Protection Officer

Encl. Annex

## Annex

### **Feedback on the Public Consultation for Proposed Advisory Guidelines on the Personal Data Protection Act for NRIC Numbers**

#### **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?***

CBS agrees on the proposed criteria for limiting the collection, use or disclosure of individuals' NRIC numbers. For authentication purposes, it is necessary for CBS to request for the physical NRIC to accurately establish the identity of the individual and retain copies of the NRIC for evidential purposes in case of any disputes / investigations.

#### **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?***

No comments as CBS does not retain individuals' physical NRIC but merely sight the physical copy for verification purposes.

#### **Question 3**

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

Other scenarios to consider including in the advisory guidelines:

Third-party authentication – CBS has channel partners (e.g. SingPost) to accept application forms requesting for credit report on behalf of CBS. The need for copies of NRIC is crucial for CBS to ensure that the consumer information received are verified and accurate before credit reports are processed.

Amendments to data – An individual may request CBS to correct an error or omission in any data about the individual that is in the possession or under the control CBS. The request for NRIC numbers is necessary to establish and verify the identity of the individual before investigation can be carried out.

**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?***

No comments as CBS' existing business practices are already conforming to the proposed requirements, it will not be necessary to implement operational changes. CBS will continue to review the internal processes periodically and will make necessary enhancement to ensure that personal data are safeguarded.