

15 December 2017

Personal Data Protection Commission

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

Dear Sir/Mdm

We refer to your call for comments on the proposed advisory guidelines on NRIC Numbers. We are writing in to provide our feedback as well as to seek further clarifications for our organisation base on our business and operational needs.

For further correspondences on this matter, please contact the undersigned:

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Yours sincerely

Michelle Ang

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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?

We agree that NRIC numbers or copies of NRIC can be collected, use or disclosed when it is required by the law but the organisations have to ensure that customers' NRIC details are kept and stored in proper, reliable and secured system to protect misuse and abuse. If NRIC is the only unique identifier for organisations to verify the individual, then it is legitimate for organisations to collect and use the NRIC as a form of verification of identity of individual.

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?

In our opinion, organisations should not retain the individuals' physical NRIC. If needed, they may just sight it or make softcopy of it and disclose it appropriately. For verifications, they can just get the individuals to produce their original NRIC and match it with their records for sighting only.

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

Perhaps PDPC can help to address the below common scenarios/additional issues which some organisations like ours should be aware of:

- a) Does this provision also apply to employees of an organisation? Ie: in relation to HR matters, like for instance, interviews for jobs, attending external workshops (ie: filling up application forms for courses / workshops)?
- b) We run several contests or free premium redemptions in our trade activity etc, and in order for us to verify the consumers upon prize collection, we need to have their NRIC as a unique identifier. In this instance, NRIC plays the role of proof and authentication key to avoid abuse. Can we clarify that for this case, we are able to collect their NRIC/Passport numbers/FIN Numbers in the entry forms? Please be informed that these entries (includes NRIC/Passport/FIN Numbers) will also ultimately be updated into our consumer database system. And upon prize collection, we also need to sight their physical NRIC to verify the winner.

We also believe the above comments apply to this clause extracted from your document:

1.12 Where the collection, use or disclosure of the NRIC number or copy of the NRIC is not required under any law, an organisation should generally only do so in circumstances where it is necessary to accurately establish and verify the identity of the individual to a high degree of fidelity.

With this clause, do we have the rights to still collect, store and sight their NRIC for this purpose as mentioned in (b)?

- c) We recruit members into our program through both offline and online touchpoints in which we will make contact with them (base on their consent and checking against DNC registry) by sending them product samples to try or informative SMS/Emails relevant to their motherhood journey. In order to prevent them from abusing the samples (multiple product samples per consumer), we need an unique identifier like NRIC/Passport/FIN Number/Child Birth Cert Number so that they do not register several times and requests for duplicate samples. We are not able to use Mobile number or email address or names, as these information may be fictitious or easily duplicable and anyone can simply provide fake details.
- d) We deliver samples and premiums to consumers. As part of the delivery process to get consumers to acknowledge receipt, we get them to write down the last 4 digits of their NRIC numbers on the delivery note. This acts as an evidence that the recipient has received the goods. Signature alone does not suffice, as there are complaints that signatures are being forged. Base on this example, are we able to still collect the last 4 digits of the individuals' NRIC numbers and store and use it (not full NRIC numbers)?
- e) For the 12 months period which PDPC proposes for companies to review and make changes to its systems, do you mean that during this 12 months period, we are still able to collect and store the consumers NRIC as part of our process and by the time the 12 months are up, we must no longer store and collect the NRIC? Or do you mean that during these 12 months period, companies must already start to abide by the new provision and not to collect NRIC numbers?

- f) Under the Preparation phase for the replacing of NRIC number in existing system:

Look for screens or online forms where the NRIC number is displayed, and consider whether it is required. For cases where the display is absolutely necessary, organisations should consider displaying masked NRIC numbers instead.

We have a question: We collect NRIC from consumers for the membership registration. In order to access stored NRIC information, it is only visible to the member upon logged in and not publicly visible. In this instance, are we supposed to mask the NRIC numbers?

- g) Under the Post Implementation, we can still keep the NRIC if its deemed needed to retain?

Post Implementation

- ✓ Remind users that their NRIC numbers are no longer used.
- ✓ Conduct a review to determine whether the NRIC numbers are still required in the system as well as in the organisation.
- ✓ If not required, to remove the NRIC numbers from the system.

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?

We feel the one year period is reasonable, with ample time for organisations to review and implement the changes needed for this revised provision NRIC numbers.