



18 December 2017

Personal Data Protection Commission Singapore
460 Alexandra Road
#10-02 PSA Building
Singapore 119963

Dear Sirs

RESPONSE TO PROPOSED ADVISORY GUIDELINES ON THE PERSONAL DATA PROTECTION ACT (“PDPA”) FOR NRIC NUMBERS (“Proposed Guidelines”)

SPH supports the objective of the Personal Data Protection Commission Singapore (“PDPC”) to clarify how the PDPA applies to the collection, use, or disclosure of an individual’s NRIC number, copy of NRIC or physical NRIC by organisations, as well as other data protection obligations required.

We are pleased to submit our feedback on the Proposed Guidelines issued on 7 November 2017.

1. Customer Records

Do the exemptions under the Second Schedule of the PDPA apply to NRIC numbers, namely, paragraph (f) *the collection is necessary for evaluative purposes* and paragraph (i) *the personal data is collected for the organisation to recover a debt owed to the organisation by the individual or for the organisation to pay to the individual a debt owed by the organisation*?

NRIC numbers help to ensure that companies have unique customer records in the systems to clearly confirm and verify the identities of customers, particularly for businesses with multiple products and services. The alternatives do not necessarily provide unique identifiers. Furthermore, NRIC numbers still serve the best form of verification for the purposes of conducting bankruptcy, court and other searches through the government websites and portals. If we do not collect NRIC numbers, are there alternative means to conduct these searches efficiently or to verify the identity of customers effectively?

2. Partial Collection of NRIC Numbers

We note that PDPC had in Paragraph 6.11, Chapter 6 of the PDPA, revised on 20 December 2016, provided an example to limit publication of



NRIC numbers by revealing on the last three digits and letter for lucky draw announcements.

We recommend that similarly, PDPC consider partial collection of NRIC numbers, eg last three or four digits and alphabet to be an acceptable alternative to cater for the proper identification of unique customers.

3. Where Collection of NRIC Numbers are Allowed

The Proposed Guidelines described several circumstances where the collection of NRIC numbers is acceptable, for example, admitting visitors into a secured building.

Will PDPC publish its directive or advisory guidelines for such circumstances to educate the general public on the acceptable instances?

We hope that our feedback will assist the PDPC. Please do not hesitate to contact the undersigned (email: lowhp@sph.com.sg) if you have any queries or require any clarification.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Low Huan Ping', is positioned above the printed name.

Low Huan Ping
Chief Data Protection Officer
Executive Vice President, Information Technology Division