

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

**SUBMISSION BY THE STARHUB GROUP TO
THE PERSONAL DATA PROTECTION COMMISSION**

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1. INTRODUCTION

StarHub welcomes the opportunity to provide feedback on the Public Consultation for Proposed Advisory Guidelines on the Personal Data Protection Act for NRIC numbers (the "Consultation").

StarHub is pleased to provide its comments on the Consultation in the following section 2.

2. STARHUB'S COMMENTS ON THE CONSULTATION

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?**

In relation to item (a), as the PDPC has provided for in the case examples, subscribing to a mobile telephone line would necessitate providing a copy of the subscriber's NRIC. In this regard, StarHub is therefore required under the law to collect a copy of a mobile telephone subscriber's NRIC. It should be noted, however, that StarHub provides services beyond mobile telephone subscriptions to consumers, for example pay-TV and broadband services, for which the collection of a copy of the NRIC may not be expressly required under the law. These other services may be subscribed together with mobile telephone services. Further, a customer may also subscribe or participate in ancillary activities or services (such as registration of interest for new mobile devices). However, within the provisioning and IT systems of an organisation, information on a particular customer are grouped together under the ambit of various identifiers, including the NRIC number, in order to give a complete profile of the customer. This enables the organisation to better serve the customer's needs and ensure accurate billing, communication on services rendered and payment. In relation to such ancillary activities or services, this would enable the organisation qualify the customer accurately for administration of such activity.

As such, although not expressly required under the law, StarHub suggests that it is reasonable for an organisation like StarHub to be permitted to collect copies of the NRIC, or NRIC numbers, in relation to all its services, product offerings to, or touchpoints with, a customer.

StarHub also submits that the use of NRIC numbers may be in the interests of customers as the most convenient means for them to identify themselves to an organisation. While customers may have other unique identifiers (for example, in StarHub's case, each service would have a unique account number), it is likely that this may: (a) not be easily recalled by a customer; and (b) may not be readily at hand (for example, in StarHub's case, customers may need to reference their latest bills for the account number). If given the choice, many customers would still view NRIC numbers as the easiest and most convenient identifier for themselves. It may therefore be useful for the PDPC to position the provision of NRIC numbers as an individual choice for customers (to allow ease of identification), rather than strictly prohibit the provision of NRIC information altogether.

We would also note that credit bureaus are likely to use NRIC information as a unique identifier. Without access to NRIC information, it may not be possible for organisations to carry out credit checks with the credit bureaus. Accordingly, the PDPC may also wish to include an item (c) above, allowing organisations to collect NRIC information where it is necessary to carry out checks of that customer with a credit bureau.

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?**

StarHub is in agreement with the proposed criteria in relation to the retention of individuals' physical NRIC.

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

StarHub has no further comments on this.

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?

Subject to the PDPC's agreement with our comments above in Question 1, namely that it is reasonable for an organisation like StarHub to be permitted to collect copies of the NRIC, or NRIC numbers, in relation to all its services, product offerings to, or touchpoints with, a customer, StarHub is in agreement with the proposed provision of up to one year from the issuance of the advisory guidelines.

Otherwise, if PDPC is not in agreement with StarHub's comments, more effort may be required to make changes to existing StarHub systems and processes, and we believe that an 18-month period may be more appropriate.

3. CONCLUSION

In conclusion, while StarHub welcomes the direction of the Consultation, StarHub is of the view that the Consultation must take into account: (a) organisations' classification of information to serve customers' needs; and (b) customer choice and convenience.

StarHub is grateful for the opportunity to provide feedback on the Consultation, and we hope that the Commission will consider our comments. Thank you.

StarHub Group

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