

PDPC's Public Consultation on the Proposed Advisory Guidelines on Children's Data
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A. Background information	
Submitting organisation	The Hongkong and Shanghai Banking Corporation (HSBC)
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B. Summary of major points	
We would like to raise queries on the guidelines. Refer to our comments.	
C. Comments to questions outlined in the above Part II	
Section reference	Feedback
1.5	An organisation may collect/ use a child's data and obtain consent when the individual is a child. Can the organisation handle the data collected/ retained differently once the child is no longer considered a minor?
1.5	Can the guidelines provide examples of scenarios where the guidelines may not apply when an organisation is unable differentiate that the party that the organisation is collecting the data from is a child (e.g. collection of data via cookies / first party)?