

Centre for Information Policy Leadership (CIPL) Workshop in collaboration with the Singapore Personal
Data Protection Commission
“Implementing Accountability “
26 July 2018

A Regulator’s Perspective on Accountability and How to Incentivise It

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Privacy Commissioner for Personal Data, Hong Kong, China



香港個人資料私隱專員公署
Privacy Commissioner
for Personal Data, Hong Kong



Presentation Outline

1

Hong Kong—Privacy Management Programme

2

Engaging the Data Controllers (SMEs)

3

Data Ethics and Trust



Hong Kong—Privacy Management Programme

Hong Kong – Privacy Management Programme



Initiated by the Hong Kong Privacy Commissioner

Not a legal requirement

Corporate governance responsibilities



Top-down business imperative

Data protection policies & procedures in place

A paradigm shift

Paradigm Shift

*From Compliance
to Accountability*

Compliance Approach

- Passive
- Reactive
- Remedial
- Problem-based
- Handled by compliance team
- Minimum legal requirement
- Bottom-up



Accountability Approach

- Active
- Proactive
- Preventive
- Based on customer expectation
- Directed by top-management
- Reputation building
- Top-down



PMP – Fundamental Principles

Top-Down Organisational Commitments

Top-
management
commitment and
buy-in



Setting up of a
dedicated data
protection office
or officer



Establishing
reporting and
oversight
mechanism



6

PMP – 7 Practical Programme Controls



Personal
Data
Inventory



Privacy
Policies



Risk
Assessment



Training
Plan



Breach
Handling



Data
Processor
Engagement



Communication

PMP – Ongoing Assessment and Revision



Carrots or Sticks?




- Deterrence and punishment had limited effects
- Maximum fine for DM conviction cases - **US\$4,000 only!**
- No power to impose administrative fines
- Promoting accountability through PMP



Organisations' Sharing

• **Daily Training and Quiz on Data Protection Principles**
Good practices on data handling were shared with the staff.



Training

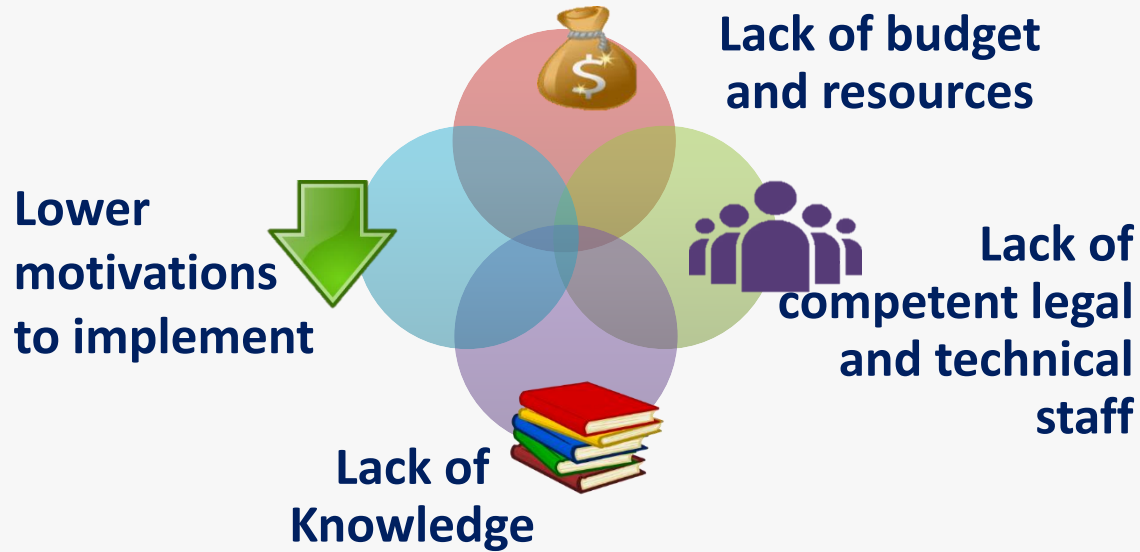
Privacy
Impact/Compliance
Assessment

• **Desktop Wallpaper Design Competition**



Conducted by the Government on specific projects e.g. SMART ID, e-health System, etc.

Practical Difficulties Encountered by Organisations in implementing PMP



DPAs should provide incentives

Consultancy Project on Implementation of PMP in Government

**PMP
Training**



**Consultant engaged to
facilitate bureaux
/departments to
implement PMP**

**PMP Manual
(To be completed this year)**



**Advice
provided by the PCPD**

Deliverables by the Consultant

General Reference
Guide



Workshops

PMP Manuals for
selected government
bureau/departments



Toolkits and training
materials

PMP Manuals for government departments



✓ Cover all components of a PMP

Section 1:

Overview of the Privacy Management Programme (“PMP”)

Organisational Commitment

A-1a. Roles and Responsibilities of the Departmental Data Protection Officer and Other Officers Assisting in the Implementation of PMP
A-1b. Reporting Mechanism

Section 2

Overview of the Personal Data (Privacy) Ordinance

Programme Controls

A-2b. Policies for Handling Personal Data
A-2c. Risk Assessment Tools
A-2d. Training and Education
A-2e. Breach Handling
A-2f. Data Processor Management
A-2g. Communication

Section 3:

The tailor-made PMP

Ongoing Assessment and Revision

1. Oversight and Review Plan
2. Review of PMP’s Effectiveness

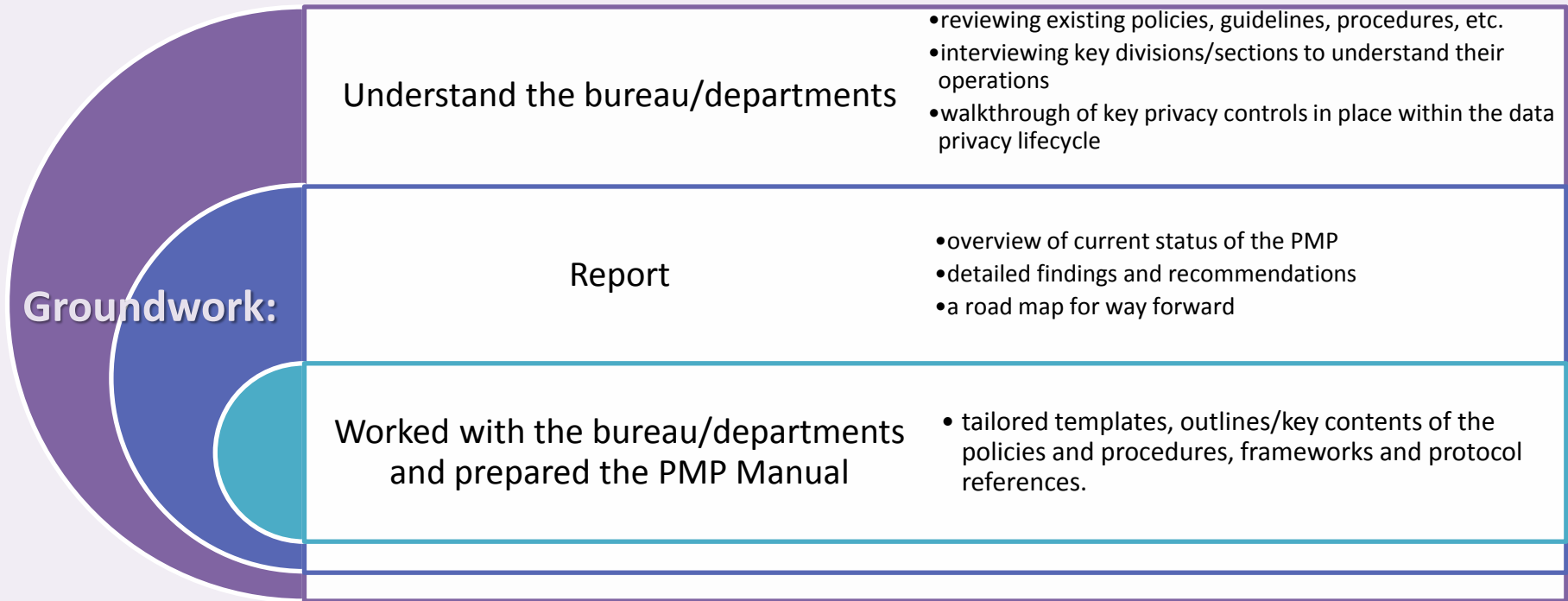
PCPD



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for Personal Data, Hong Kong

PMP Manuals for government departments



PMP Manuals for government departments



Based on the observations identified



Remediate the gaps identified

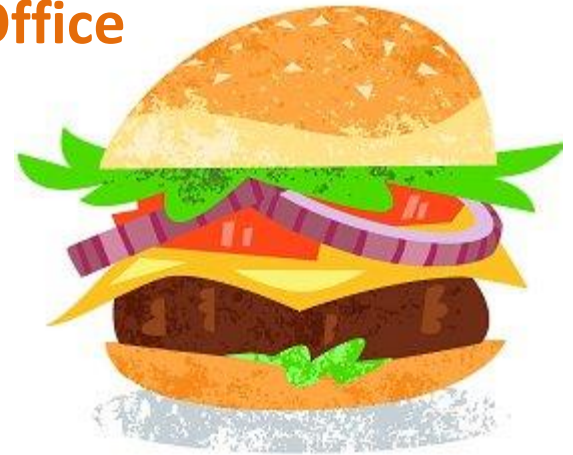


PMP Manuals for government departments



Set up of Data Protection Office

Specified **roles** and **responsibilities** of
Data Protection Officer,
Personal Data Privacy Officer
and
Team Coordinator



privacy respectful culture

PMP Manuals for government departments



Role	Officer	
Data Protection Officer	[Post/Title of the officer(s) - To be decided by each individual Bureau / Department.]	
Personal Data Privacy Officer		
Team Coordinator	Team 1	[Post/Title of the officer(s) - To be decided by each individual Bureau / Department.]
	Team 2	
	Team 3	
	Team 4	
	Team 5	
	Team 6	
	Team 7	



PMP Manuals for government departments



privacy respectful culture



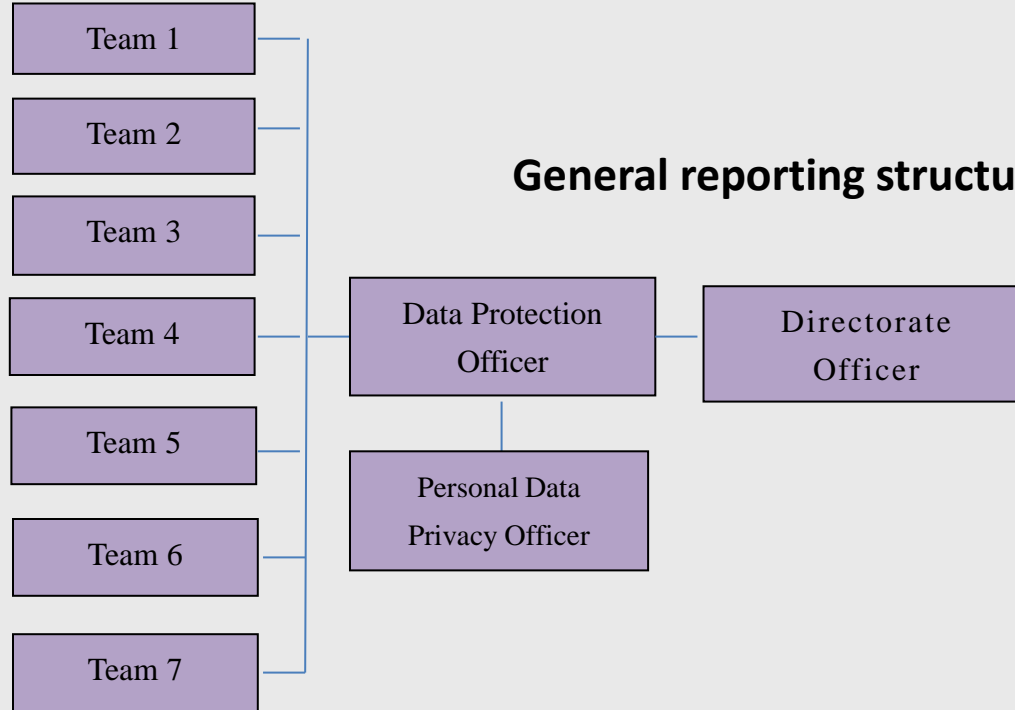
Set up of a clear **general reporting structure & reporting mechanism** with **respect** to **data breach handling**



PMP Manuals for government departments



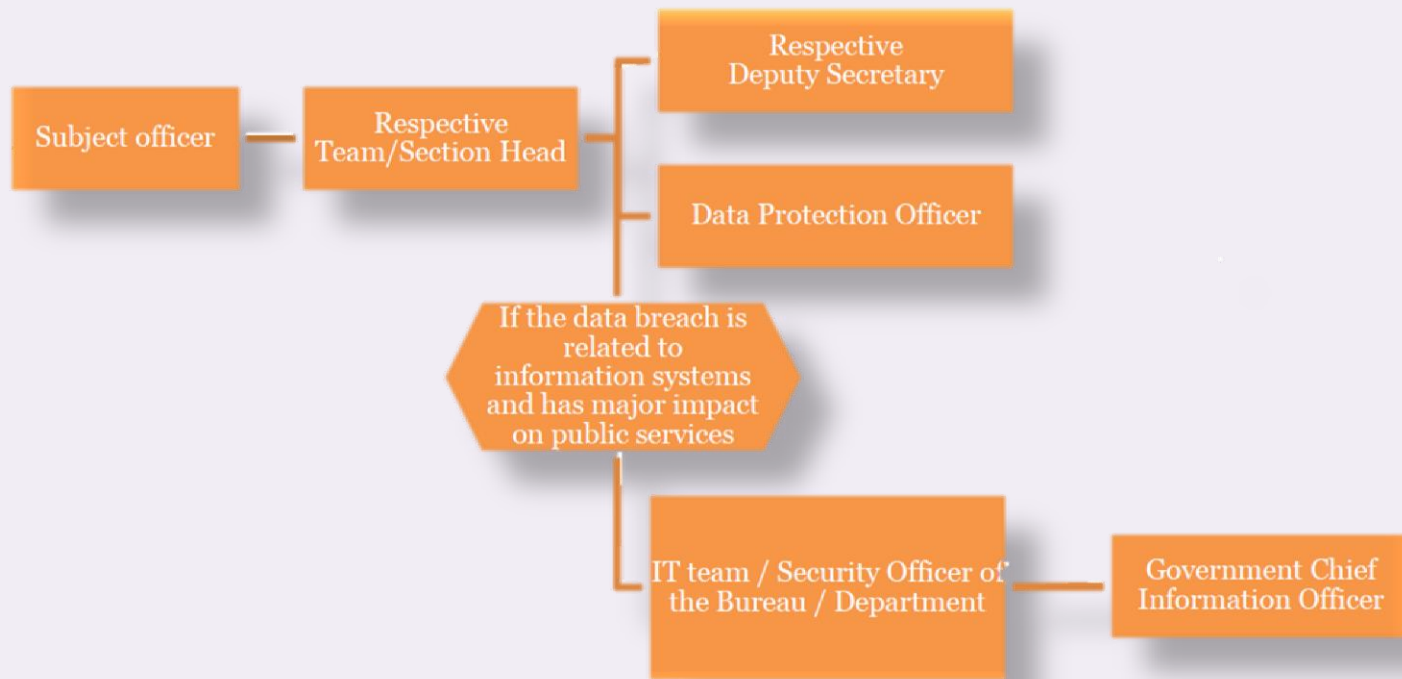
Team Coordinators



PMP Manuals for government departments

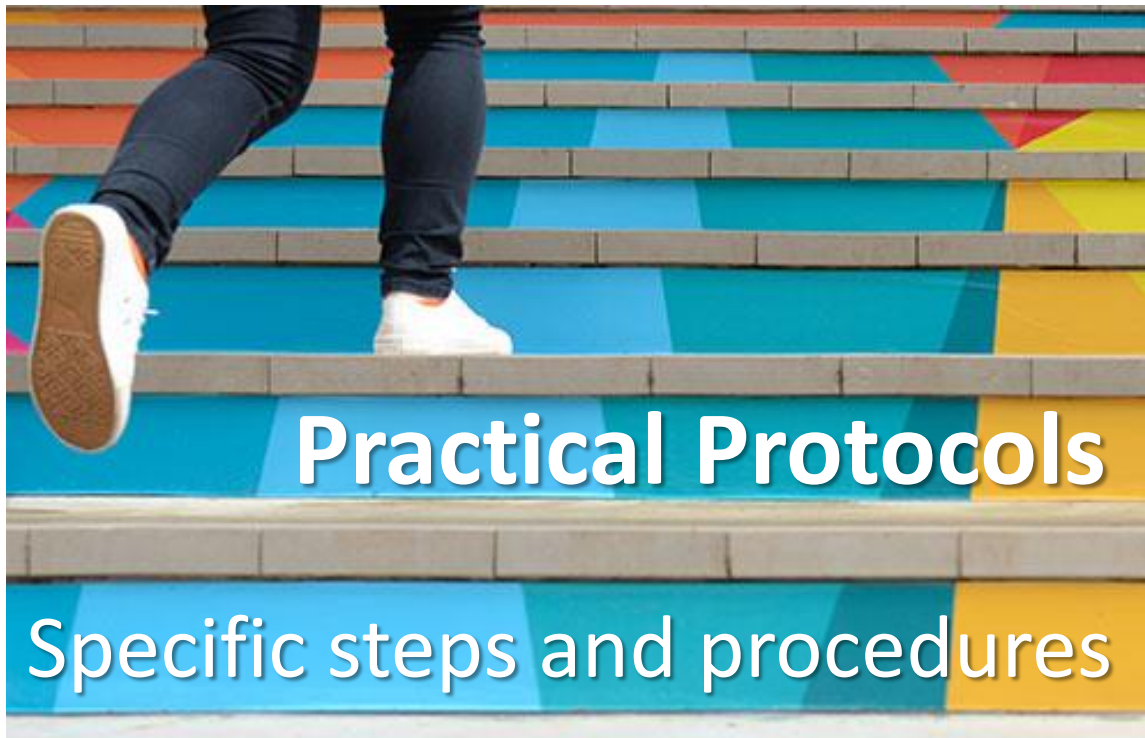


Set up of reporting mechanism with respect to data breach handling





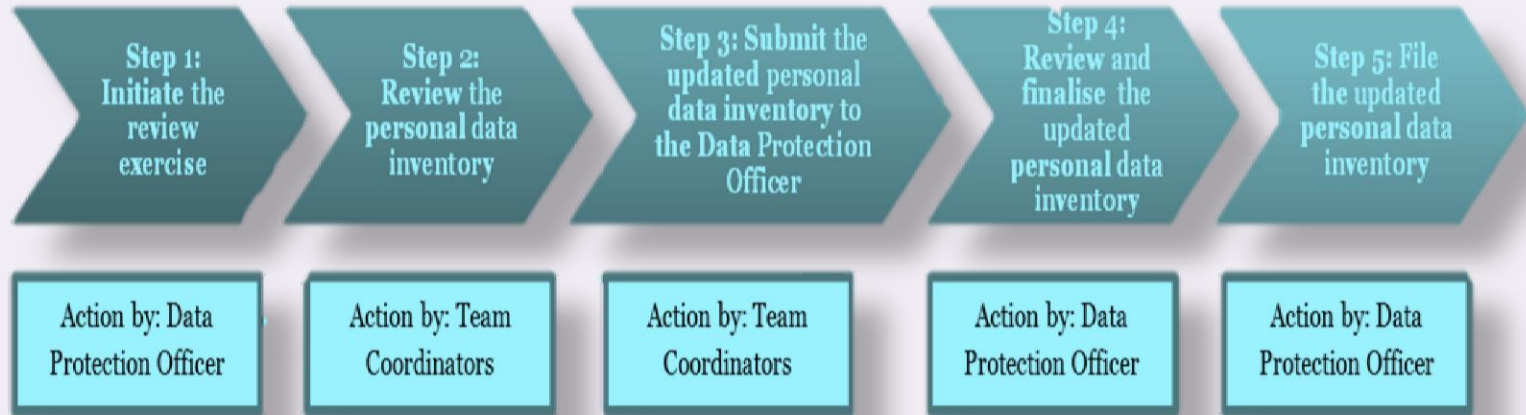
PMP Manuals for government departments



PMP Manuals for government departments



✓ Steps for Personal Data Inventory Review

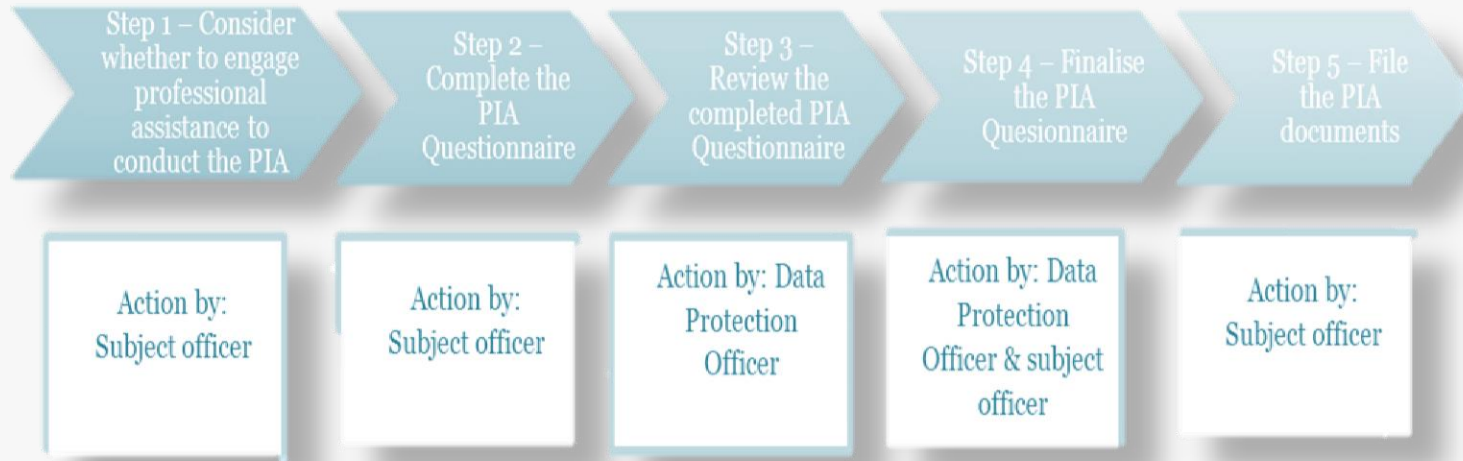


PMP Manuals for government departments



✓ Specific steps and procedures

Steps for conducting a Privacy Impact Assessment





PMP Manuals for government departments



PMP Manuals for government departments

Tailored templates



Team/Section		
Name of data processor		
Purpose of engaging the data processor		
Brief description of personal data processed/accessed by the data processor		
Date of engagement with the data processor		
Part 2: Review of BUREAU / DEPARTMENT's management of data processors		
Questions	Yes/No	Remarks
1) Do the contractual terms cover BUREAU / DEPARTMENT's right to audit and inspect how the data processor handles and stores personal data?		
2) Do the contractual terms cover the data processor's obligation to report immediately to BUREAU / DEPARTMENT for any loss of documents, security breaches or signs of abnormalities?		
3) Do the contractual terms cover the limitation of using or disclosing any personal data it receives or gains knowledge of that should be for a purpose which the personal data is entrusted to it?		
4) Do the contractual terms cover the sub-contract arrangement limitations and arrangements?		
5) Do the contractual terms cover the timely return, destruction or deletion of personal data by the data processor?		
6) Do the contractual terms cover the data processor's obligations to adopt practicable means to protect the data entrusted to it (e.g. appropriate security measures, personal data protection policies and procedures, adequate training to relevant staff, cross-border data		

transfer arrangement)?		
7) Do the contractual terms cover the consequence for violation of the contract?		
8) Is the Team/Section satisfied that the data processor had followed the contractual obligations in respect of personal data protection? If "Yes", please elaborate.		
9) If the answer to Q(8) above is "No", did the Team/Section take any actions?		
10) Has the Team/Section performed any scheduled audit/inspection on the data processor in the past three years (including surprise visit)? If the answer is "Yes", please state: (a) the year of the audit/inspection (b) any irregularities identified; and (c) any remedial actions taken. If the answer is "No", please explain why an audit/inspection is not required.		
11) If audit/inspection was performed on the data processor this year, has the Team/Section identified any irregularities? If "Yes", please state the details and the improvement measures taken by the data processor.		
12) Has any data breach incidents occurred which involved the data processor? If "Yes", please provide the corresponding Data Breach Information Sheet as attachment (please refer to Annex Q of the PMP Manual).		

Completed by (Team Coordinator)
Signature _____
Name _____
Post _____
Date _____

Reviewed by (Data Protection Officer)
Signature _____
Name _____
Post _____
Date _____

Reviewed by (Team / Section Head)
Signature _____
Name _____
Post _____
Date _____

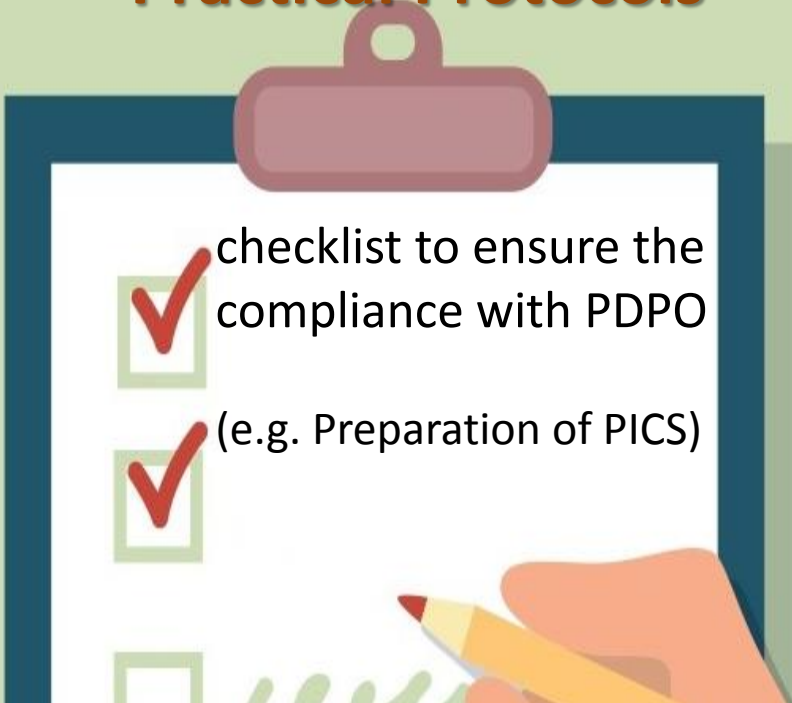
Data Processor Review



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Privacy Commissioner
for Personal Data, Hong Kong

PMP Manuals for government departments

Practical Protocols

- 
- checklist to ensure the compliance with PDPO
(e.g. Preparation of PICS)

PMP Manuals for government departments



Checklist
for
Preparation
of PICS



Checklist for the Preparation of PICS

Part 1: Background Information

Activity _____
Team/Section _____
Subject officer (Name and Position) _____
Expected date of adoption of the PICS concerned _____

Part 2: Required Information – Team Coordinators must include the following item when preparing a PICS

Item	Checked <input type="checkbox"/>
The PICS should inform the data subject of the following information:	
(a) a statement of the purpose for which the personal data collected will be used	<input type="checkbox"/>
(b) a statement of whether it is obligatory or voluntary for the data subject to supply his/her personal data	<input type="checkbox"/>
(c) a statement of the consequences if he/she fail to supply his/her personal data where it is obligatory to do so	<input type="checkbox"/>
(d) a statement of the classes of persons to whom personal data collected may be transferred or disclosed	<input type="checkbox"/>
(e) a statement of the data subject's rights to request access to and correction of his/her personal data	<input type="checkbox"/>
(f) the contact details of the Personal Data Privacy Officer for data subject to request for access or correction of their personal data if applicable	<input type="checkbox"/>
(g) a statement of the security measures adopted to safeguard the personal data to be collected	<input type="checkbox"/>
(h) a hyperlink to the Privacy Policy Statement at [to be inserted with bureau / department's respective website] if the PICS is to be given online	<input type="checkbox"/>

Part 3: Presentation of PICS

Item	Checked <input type="checkbox"/>
1. The PICS will be provided to the data subject on or before collecting his/her personal data.	<input type="checkbox"/>
2. The purpose statement is not too vague or too wide in scope.	<input type="checkbox"/>
3. User-friendly language (e.g. the choice of simple rather than difficult words and the avoidance of use of legal terms or convoluted phrases) and presentation are used.	<input type="checkbox"/>
4. The layout and presentation of the PICS (including the font size, spacing, underlining, use of headings, highlights and contrasts) has been designed so that the PICS is easily readable to individuals with a normal eyesight.	<input type="checkbox"/>
5. The PICS is presented in a conspicuous manner (e.g. the PICS is a stand-alone section and its contents are not buried among other	<input type="checkbox"/>

PMP Manuals for government departments



Practical Protocols *Policies*

(e.g. collection of identity card,
use of portable electronic
storage devices, handling of
DAR & DCR)

Practical Protocols

GUIDELINES

*Guidelines (e.g. handling of PD
obtained from Hotline, record
disposal)*

PMP Manuals for government departments



Comprehensive TRAINING ACTIVITIES



Engaging the Data Controllers (SMEs)

Engaging Through Education

- Website: PCPD.org.hk



A screenshot of the PCPD website homepage. The header includes the PCPD logo, the website URL "PCPD.org.hk", and the text "香港個人資料私隱專員公署 Privacy Commissioner for Personal Data, Hong Kong". Below the header is a navigation menu with links for "About PCPD", "Data Privacy Law", "News & Events", "Compliance & Enforcement", "Complaints", "Legal Assistance", "Education & Training", "Resources Centre", and "Enquiry". A search bar is located on the right side of the navigation menu. The main content area features a large graphic titled "European Union General Data Protection Regulation 2016" with a blue background and various icons representing data protection concepts. Below this graphic is a section titled "European Union General Data Protection Regulation (GDPR) 2016" booklet, which includes a brief description of the booklet's purpose. To the right of the main content is a "What's New" section with a list of recent news items, including "Unleashing Potential in Innovation and Technology - Promoting Data Privacy Protection Award Presentation Ceremony of Student Ambassador for Privacy Protection Programme" and "Privacy Commissioner Expresses Concerns Over Typeform's Data Breach Incident". At the bottom of the page, there are two columns: "For Individuals" and "For Organisations", each containing a list of resources and guides.

Engaging Through Education

- Thematic Websites

Data Protection Principles Student Ambassador Programme Liberal Studies Hot Issues Resources Corner Events Privacy Policy Statement

Children PRIVACY

Protect, Respect Personal Data

A one-stop portal for children to learn and understand personal data privacy, and for teachers and parents to help those under their care in how to protect their personal data.

Latest News
08.05.2017

- "Share Personal Data with Care" - PCPD Joins Hands with Members of the Asia Pacific Privacy Authorities to Host the "Privacy Awareness Week 2017"

24.01.2017

- Privacy Commissioner Urges IoT Manufacturers to Enhance the Transparency of Their Privacy Protection Measures

Practical Tips for Parents and Teachers

CHILDREN ONLINE PRIVACY

www.pcpd.org.hk/childrenprivacy

PCPD.org.hk

香港個人資料私隱專員公署
Privacy Commissioner for Personal Data, Hong Kong

保護、尊重個人資料
Protect, Respect Personal Data

Protect Your Data • Internet • Smartphone • Social Networking • Cyber-bullying • Web Cams • IoT • Business

Think Privacy! Be SMART Online

A one-stop portal to provide useful information and tips for you to protect personal data on your computer and to reduce the risks of online privacy breach.

TVC Educational Videos Be Smart Online Quiz

上私隱要自保
Be SMART Online

Physical Tracking and Monitoring Through Electronic Devices

Protect, Respect Personal Data

Smart Use of Internet of Things

What's New

11/05/2017 Privacy Commissioner Issues "Physical Tracking and Monitoring Through Electronic Devices" Information Leaflet

24/01/2017 Privacy Commissioner Urges IoT Manufacturers to Enhance the Transparency of Their Privacy Protection Measures

21/11/2016 Privacy Commissioner Follows Up on Privacy Concerns Over the Collection and Integration of User's Personal Data by Three Mobile Apps with "Call-Blocking" Function

www.pcpd.org.hk/besmartonline

Engaging Through Education

- Social Media

www.youtube.com/user/PCPDHKSAR

YouTube HK 搜尋

PCPD H.K. 慎留數碼腳印 智慧生活態度 Stay Smart Mind Your Digital Footprint www.PCPD.org.hk

PCPDHKSAR 主頁 影片 播放清單 頻道 討論 關於

《個人資料(私隱)條例》下的六項保障資料原則
觀看次數：2,308次 10個月前
by Office of the Privacy Commissioner for Personal Data (個人資料私隱專員公署)

保障、尊重個人資料 Protect, Respect Personal Data PCPD.org.hk

Facebook Be SMART Online 網上私隱要自保 - PCPD Hong Kong

Be SMART Online 網上私隱要自保 - PCPD Hong Kong @besmartonlinepcpd

Home About Photos Videos Events Posts Community Create a Page

Featured For You

782 people follow this Save

781 people like this

Non-Governmental Organization (NGO)

Community Invite your friends to like this Page

781 people like this 782 people follow this

About Send Message www.pcpd.org.hk/besmartonline Non-Governmental Organization (NGO) Impressum

People Also Like

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PCPD H.K. PCPD.org.hk

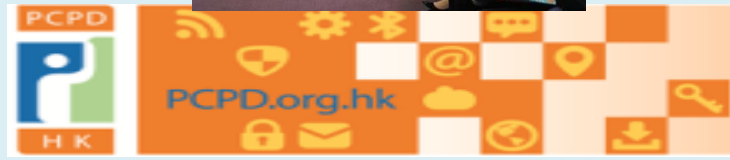
香港個人資料私隱專員公署 Privacy Commissioner for Personal Data, Hong Kong

Engaging Through Education

- Seminars, talks, speaking engagements: self-organised or upon invitation
- Industry-specific and individual companies/organisations; chambers and associations
- Covering both public and private sectors
- In 2017: Conducted 314 professional workshops,
- talks, seminars, speaking engagements and meetings with stakeholders, with 25,038 participants



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Privacy Commissioner
for Personal Data, Hong Kong

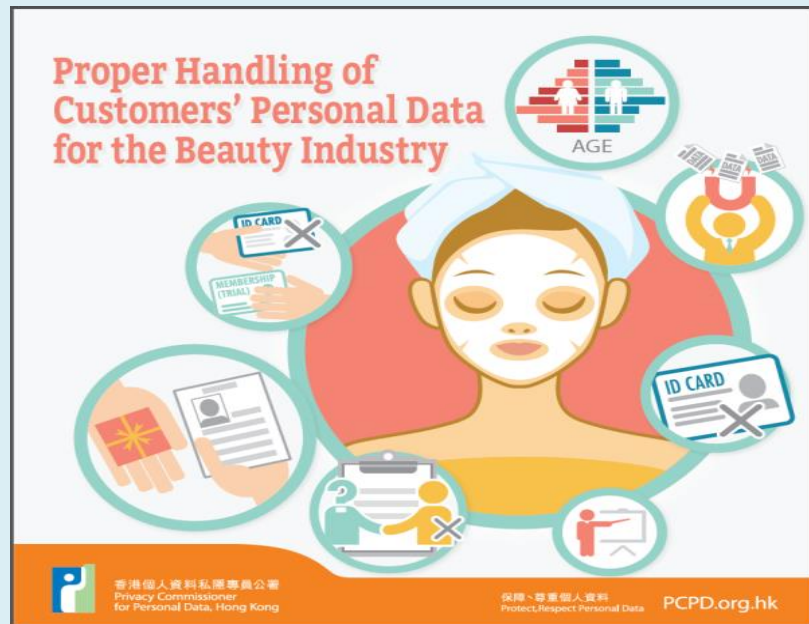
Engaging Through Education

- Industry-specific tools and guidance

Online Assessment Tool for Retail Operation



Guidance Note for Beauty Industry



Engaging Through Education

- Industry-specific tools and guidance
 - at PCPD.org.hk



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Engaging Through Education

- Industries engaged:



中小企保障私隱運動

Privacy Campaign for SME

中小企專用諮詢

Dedicated Enquiry Services for SME



2110 1155



sme@pcpd.org.hk



Privacy Campaign for SME

- Guidance Note for SME
- A new toolkit dedicated for SME will be published
- Revamp the online self-training module for SME
- Engage SME chambers and associations

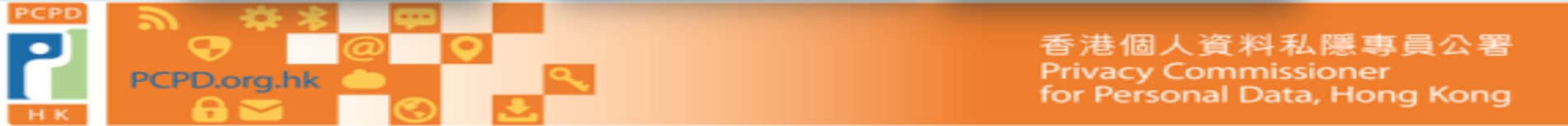


Engaging Through Promotion

- Media promotion

In 2017:

- Press releases: 30
- Responses to media enquiries: 217
- Media interviews: 54



Engaging Through Promotion

Op-ed articles

香港旅遊業議會
The Voice of TIC
A quarterly publication of the Travel Industry Council of Hong Kong

主編啟事
Cover Story

切勿輕視個人資料保安

Personal data security must be taken seriously

加遊業界以情懷好客聞名，維護好聲譽良好的形象，是行業的責任。旅遊業界必須確保個人資料的安全，以免影響其聲譽。旅遊業界必須確保個人資料的安全，以免影響其聲譽。旅遊業界必須確保個人資料的安全，以免影響其聲譽。

個人資料的保安

Organisations as data users should take all practicable steps to ensure that customer personal data is protected against unauthorized or accidental access, processing, misuse, loss or use, or they may compromise the Data Protection Principle (one of the six Data Protection Principles) under the Personal Data (Privacy) Ordinance.

In addition, if organisations engage data processors, whether on- or outside Hong Kong, to process personal data on their behalf, the organisations must adopt contractual or other means to prevent unauthorised or accidental access, processing, misuse, loss or use of the data transferred to the data processors.

The essence of the Data Security Principle is whether an organisation has taken "all practicable steps" to ensure the security of personal data. Therefore, a data breach incident does not necessarily equate to the Data Protection Principle having been compromised by the data user. The PCPD will evaluate from various aspects to consider whether an organisation has taken all practicable steps, including:

• Organisational preventive measures, such as consistency of application of personal data privacy protection in corporate governance

接洽會員開展不同項目
Project after project for members

切勿輕視個人資料保安
Personal data security must be taken seriously

PCPD
PCPD.org.hk

HONG KONG LAWYER 香港法律師, June 2018

Matthew Gearing QC
Chairperson, Hong Kong International Arbitration Centre
香港國際仲裁中心主席

HONG KONG LAWYER
THE OFFICIAL JOURNAL OF THE LAW SOCIETY OF HONG KONG 香港律師會月刊

MARITIME 海事
Herein Steps to Strengthen Hong Kong Maritime Arbitration
強化香港海商爭端的三種做法

INTERNATIONAL 國際
Hong Kong's Role in Contemporary Treaty-Making Practice: Treat-Based Environmental Care-Outs
經濟活動對環境保護的承諾
以條約為本的環境保護外溢

TECHNOLOGY 科技
Retailer of Real Estate Services: A Risk-Based Approach to Data Security
地產代理的數據保安：風險為本的方法

DATA PRIVACY

EU GDPR and HK PPDPO: What's the Difference?

The EU General Data Protection Regulation (GDPR), adopted in 2016, is a landmark in the evolution of the framework for data protection and information privacy.

It is a general data protection law that sets the minimum standards for the protection of personal data. It applies to all processing of personal data, regardless of whether the data controller or processor is a public authority or a private individual or company, and regardless of whether the data is processed for commercial or non-commercial purposes.

The EU GDPR is a significant development in the field of data protection, and its implementation is expected to have a major impact on the way in which organisations handle personal data.

The EU GDPR is a landmark in the evolution of the framework for data protection and information privacy. It is a general data protection law that sets the minimum standards for the protection of personal data. It applies to all processing of personal data, regardless of whether the data controller or processor is a public authority or a private individual or company, and regardless of whether the data is processed for commercial or non-commercial purposes.

FIRST FACTS ON THE EU GDPR AND HONG KONG PPDPO (MAJOR DIFFERENCE)

Application
EU: Data processors or controllers; with an establishment in the EU, or established outside the EU, that offer goods or services to, or monitor the behaviour of individuals in the EU (Art 3).

HK: Data users (controllers / processors) who, either alone or jointly with others, process personal data, if the processing is common with other persons, control the collection, holding, processing or use of the personal data in or from Hong Kong, [s.2(7)].

Personal Data
EU: "Personal data" means: any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, by means of information, in particular location data and online identifier, [Art 4(1)].

HK: "Personal data" means any data – (a) relating directly or indirectly to a living individual, (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable. [s.2(1)].

Accountability and Governance
EU: Risk-based approach; data controllers are required to: implement technical and organisational measures to ensure compliance [Art 24]; adopt data protection by design and by default [Art 25]; conduct data protection impact assessment for high-risk processing [Art 35]; and (for certain types of organisations) designate Data Protection Officers. [Art 37].

HK: The accountability principle and the related privacy management measures are not explicitly stated. The Privacy Commissioner advocates the adoption of a privacy management programme which manifests the accountability principle, the appointment of data protection officers and the conduct of privacy impact assessment are recommended good practices for achieving accountability.

Sensitive Personal Data
EU: Sensitive personal data means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, genetic data, biometric data for uniquely identifying a natural person, or data relating to criminal convictions and offences. [Art 9(1)].

HK: Sensitive personal data means data of a special kind which, if disclosed, might cause harm to the privacy of the individual, such as race, origin, sex, religion, political opinions, criminal record, health, etc. [s.6(1)].

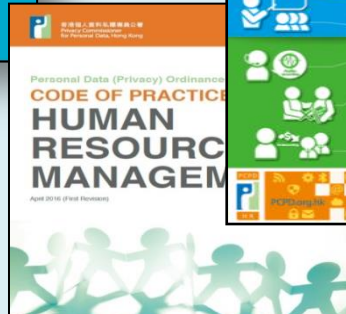
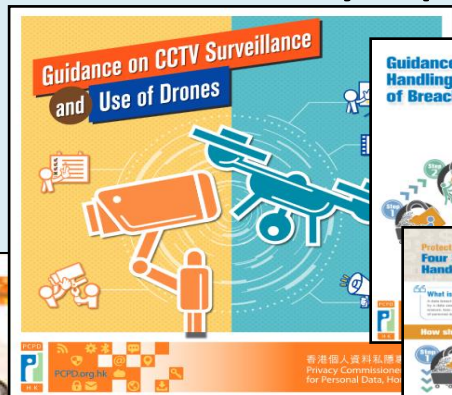
which may be judicial process, and activities on which the new law data protection last them in for disparities in their application in particular applications with the Office of the Personal Data Commissioner (General Data Protection Commissioner) available for e-mail: pdco@pcpd.org.hk

律律師的 已於2018年6月1日起生效。及新修訂的定章則，以妥善的資料處理。及新修訂的定章則，以妥善的資料處理。及新修訂的定章則，以妥善的資料處理。

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Engaging Through Promotion

- Publications
 - Topic-specific
 - Industry-specific



Engaging Through Exchanges and Dialogues

- Data Protection Officers' Club
 - Established in year 2000
 - Over 550 members from public and private sectors
 - A platform for members to share and exchange views



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Engaging Through Exchanges and Dialogues

- Data Protection Officers' Club
- Seminars, sharing sessions, visits, etc.



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Engaging Through Exchanges and Dialogues



保障資料主任聯會
DATA PROTECTION OFFICERS' CLUB

香港個人資料私隱專員公署
Privacy Commissioner for Personal Data, Hong Kong
PCPD.org.hk

- About DPOC
- Membership
- Activities
- DPOC e-Newsletter
- DPOC's Corner
- Best Practice Sharing
- List of Organisational Members
- Photo Gallery
- Privacy Awareness Week (PAW) 2016

Data Protection Officers' Club

Dedicated website and e-newsletter



香港個人資料私隱專員公署
Privacy Commissioner for Personal Data, Hong Kong

DPOC e-newsletter
ISSUE 10, 31 MAY 2018

What's On

Privacy Commissioner Mr Stephen Wong delivered a presentation for The SME ONE of The Productivity Council titled "Why General Data Protection Regulation is Relevant to Hong Kong Businesses/Organisations" (24 May 2018)



Download Presentation Materials (Chinese only)

Engaging Through Exchanges and Dialogues

- Work hand in hand with data controllers for issues/data breaches
- Example: data breaches by travel agents

Top News

Two more Hong Kong travel agencies hacked

By Prudence Lui / Posted on 9 January, 2018 11:28

SBS
IN FOCUS 2018 FIFA World Cup Tour de France July 7-29 Life Indigenous
SBS HOME ON DEMAND GUIDE PROGRAMS RADIO NEWS SPORT CYCLING FOOTBALL MOVIES FOOD
Cantonese home News & Features Gourmet Express Podcast Meet the team Contact us SBS Radio App



SBS CANTONESE

Another hacking report on HK Travel agent



Hack attack on popular Hong Kong travel agent WWPKG puts customer data at risk

The agency, which specialises in Japan tours, did not say how many customers were potentially affected and if data was stolen

PUBLISHED : Tuesday, 07 November, 2017, 2:48pm
UPDATED : Tuesday, 07 November, 2017, 10:53pm



Engaging Through Exchanges and Dialogues

- Meetings with chambers, trade associations and professional bodies; conduct seminars and sharing sessions
 - Hong Kong General Chamber of Commerce
 - Chinese General Chamber of Commerce
 - Chinese Manufacturers' Association of Hong Kong
 - American Chamber of Commerce in Hong Kong
 - British Chamber of Commerce in Hong Kong
 - Hong Kong Association of Banks
 - Hong Kong Monetary Authority
 - Hong Kong Institute of Chartered Secretaries



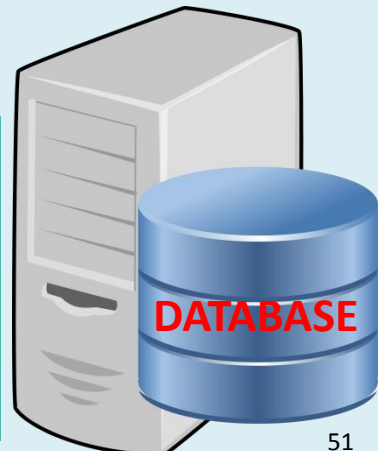
Engaging Through Exchanges and Dialogues

- Meetings and exchange of views with multinational corporations/associations for the latest developments/initiatives with privacy implications
 - Facebook: Revised privacy setting; education programmes
 - Microsoft: seminars on privacy related topics
 - Alibaba
 - PayPal
 - Visa
 - Google



Engaging Through Exchanges and Dialogues

- Hong Kong Federation of Insurers (HKFI): Proposed database for insurance claims
 - HKFI is considering to set up a central database to combat fraud. Historical claims data will be contributed to this central database by the participating insurers.
 - HKFI and PCPD have been in dialogue on this proposed initiative.
 - HKFI has taken into account PCPD's comments and has built in privacy by design in the setup of the proposed database.



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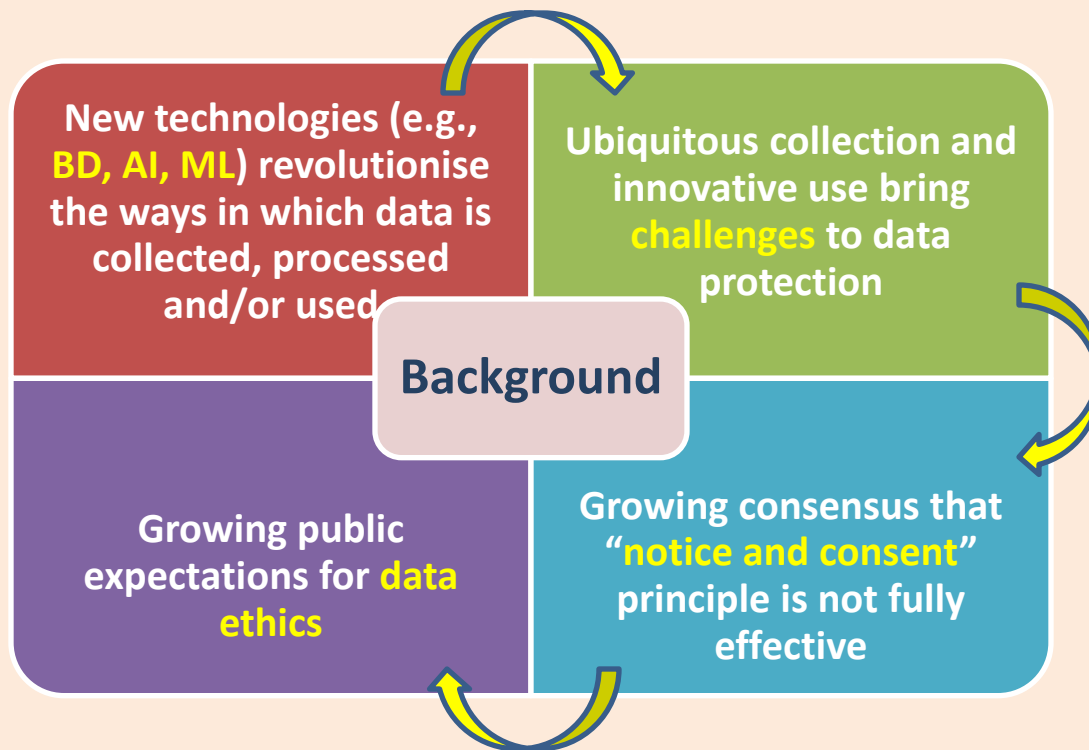
Data Ethics as a Solution

Data Ethics and Trust



- No Surprise to Consumers
- No Harm to Consumers

Promoting Ethics - “Legitimacy of Data Processing Project”



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Project Background

Project
commenced
in April 2018

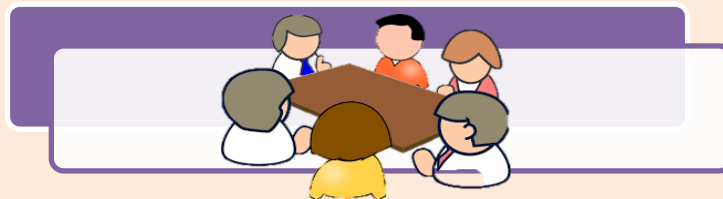
PCPD
commissioned
a US
consultancy
to steer the
Project

3 in-person
meetings in
Hong Kong

Involving 23
businesses
from different
sectors



Project Objectives



What does “ethical data processing” mean?

“Fair data processing” – what would the standards be to describe what being “fair” means?

What is the direct or indirect linkage between fair/ethical data processing and legal requirements, and what aspects of ethical data stewardship go beyond the law?

What are the motivators for business to adopt the principles and standards and utilise ethical data impact assessments?

Participating Organisations

23 participating organisations

- 4 banks
- 2 telecommunications companies
- 2 transportation companies
- 1 public utilities company
- 1 healthcare services provider
- 1 insurance company
- 1 credit reference agency
- 2 trade associations
- 9 organisations from other sectors

Methodology

In-person meetings

- **2 in-person meetings between the US consultancy and the participating organisations:**
 - understanding the level of maturity or “capability of privacy programs” within Hong Kong business community;
 - sharing of practical experience of the participating organisations in adopting / implementing accountability and data ethics;
 - discussing the data stewardship accountability elements and values, business specific “principles” that support the values, and ethical data impact assessment
- **2 in-person meetings (and email discussions) between the US consultancy and PCPD on project approach and issues**
- **1 in-person meeting among all parties to be held in August 2018**

Teleconferences

- **2 teleconferences between the US consultancy and participating organisations subsequent to the in-person meetings to follow up on the comments gathered at the meetings**

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Deliverables by the Consultancy



PCPD's Strategic Focus



спасибо
danke 謝謝
ngiyabonga
teşekkür ederim
dank je
gracias
tapadh leat
bedankt
hvala
mauruuru
dziękuję
thank you
mochchakkeram
obrigado
salamat
sagolun
sukriya
kop khun krap
go raibh maith agat
arigato
dakujem
merci
merci
ευχαριστώ
terima kasih
감사합니다