





# Cultivating Effective Data Privacy Awareness for Children: Hong Kong's Approach

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- 1. Key Children Privacy Issues in Hong Kong
- 2. How to Empower Children?
- 3. PCPD's Three-Pronged Approach



# Key Children Privacy Related Phenomena in the Digital Era

Importance of cultivating data privacy awareness of children



# Sharenting

 80% of Hong Kong parents had shared details of their children's lives on social media

# Cyberbullying/Doxxing

• 1 in 5 teenagers in Hong Kong experienced cyberbullying

# e-Learning

After the outbreak of COVID-19:

- Frequency of use: almost doubled
- Average hours of use per day: +150%

# **Use of Generative Al**

• Nearly 80% of youngsters have used generative AI tools



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# Key Privacy Issues Related to Children



Excessive / Unfair Collection	<ul> <li>Privacy policy statements / personal information collection statements are often lengthy and difficult for children to understand</li> <li>Children may not be capable of giving informed consent or making an informed decision to provide their personal data</li> </ul>
<b>Over-sharing</b>	<ul> <li>Children may not know how to manage the privacy settings of online platforms / social media networks, thus over-sharing personal data:</li> <li>Prone to doxxing and cyberbullying</li> <li>May encompass long-term consequences</li> </ul>



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1. Key Children Privacy Issues in Hong Kong

# 2. How to Empower Children?

# 3. PCPD's Three-Pronged Approach



# **From Education to Empowerment**

A Continuous, Progressive Approach is Required to Empower Children





# **Know what**

Education on Concepts Regarding Privacy Rights



# **Know how**

**Practical Dos and Don'ts** 



- 1. Keep Children Understand the Significance of Privacy Protection
- 2. Encourage Them to Protect Their Privacy Proactively

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# 3 Key Factors in Cultivating Data Privacy Awareness of Children

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**Collective Efforts of Children's Evolving Evolving Technologies** Parents, Guardians, Capacities **Teachers and Regulators** Parents and guardians **Evolving cognitive** New technologies bring as role models abilities as children new privacy risks & issues: Schools and teachers Social media grow as handler of minors' Increased learning e-Learning data & educator capacities as the smart Al...and more Regulators' efforts generation 





1. Key Children Privacy Issues in Hong Kong

2. How to Empower Children?

# 3. PCPD's Three-Pronged Approach



## PCPD's Three-Pronged Approach A holistic approach





Continuous, Progressive, Age-appropriate Materials and Activities for Children Up-to-Date Guidance Materials/Tips and Training/Workshop

Other Initiatives Targeting Parents and Teachers



# Continuous, Progressive, Age-appropriate Materials and Activities for Children

Student Ambassador for Privacy Protection Programmes –

**Partnering School Recognition Programme (SAP) (2011-Present)** 酒畑 🍼 木 私際間注運動 2011 Passass 生大使計劃2013 🛙 ----中學生關注私聞 (き) 真額研習ける 2暗私暗學生大使計 計劃2017 2024 2019 2018 2017 2016 2015 2014 2013 2012 2011 2022 保障私隱 <sub>學生大使</sub>. 保暗馱陪 學 校 黟 伴 嘉 許 計 劃 警牛關注私 「學校夥伴嘉 計劃2016

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**Continuous Campaigning** 

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# Continuous, Progressive, Age-appropriate Materials and Activities for Children

### Education Efforts Cyberbullying / Doxxing-related Education

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Introductory Mini-site About the Basis of Privacy



 New Digital Era, Say 'No' to Cyberbullying

> Cyberbullying Leaflet (with Dos and Don'ts)



Pointe 8 7/20 Phone Model Hair Length ses "Hörne" "el Address, volour Walches Brand Car Model

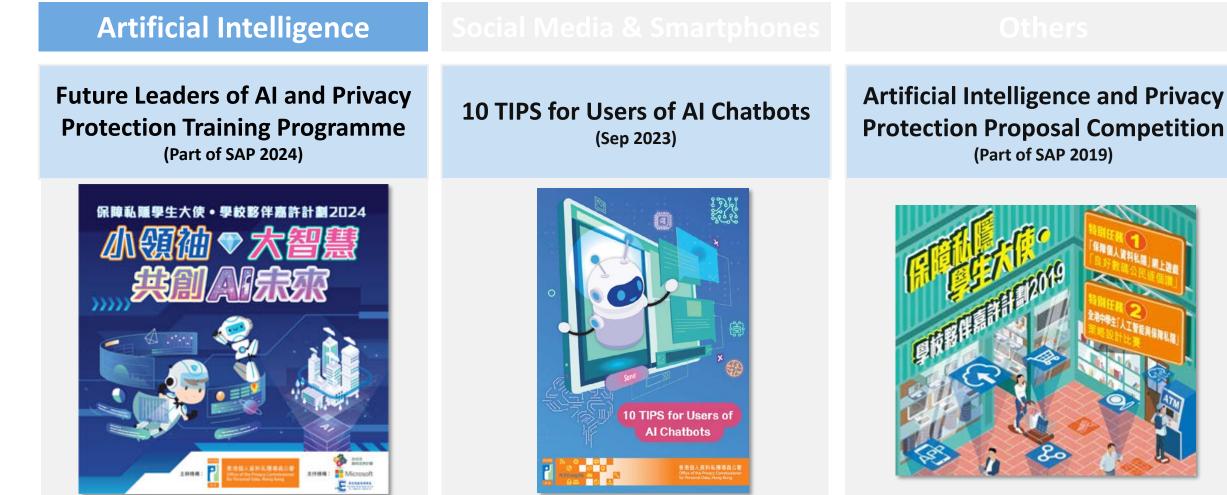
Mobile Game Apps Design Competition for Secondary School Students (Part of SAP 2021-22)

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# 2 Up-to-Date Guidance Materials/Tips and Training/Workshop





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# 2 Up-to-Date Guidance Materials/Tips and Training/Workshop

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Smartphones   (Mar 2024)     Image: I			Social Media & Smartphones	
Response of the response of th	• •	Reminders on WhatsApp Hijacking	Social Media	Smartphones
	pp Account Hijacking r for Personal Data (PCPD) received data breach ns and schools, reporting that their accounts on nmunication with service users, students and/or n impersonated the organisations and used the tacts in the address books, attempting to swindle 100 individuals and the affected data included ents, parents of students and/or staff members. On iffed the affected individuals. higher sonating victims' friends and relatives and sending codes of their WhatsApp accounts; or using fake and the registration codes of their WhatsApp tsApp accounts and impersonate the victim to send windling money or personal data. nd organisations to be cautious of WhatsApp	Date: 5 October 2023 Privacy Commissioner's Office Urges the Public and Or to Guard against WhatsApp Account Hijackin In the past month, the Office of the Privacy Commissioner for Personal Data (PCP notifications from a total of five social welfare organisations and schools, reporting the instant messaging application WhatsApp used for communication with service parents of students had been hijacked. The fraudsters then impersonated the orgon hijacked WhatsApp account to send messages to the contacts in the address boo them. The incidents involved the personal data of nearly 900 individuals and the anames and mobile phone numbers of service users, students, parents of students the PCPD's advice, the organisations concerned have notified the affected individ "WhatsApp account hijacking" generally refers to fraudsters impersonating victims' frian- messages to them requesting them to forward the registration codes of their WhatsApp WhatsApp websites to obtain the victims' telephone numbers and the registration codes accounts. The fraudsters then gain access to the victims' WhatsApp accounts and imper- messages to contacts in the address book of the account for swindling money or persor In this regard, the PCPD reminds members of the public and organisations to be or account hijacking. The PCPD recommends the public taking the following measure	Be Smart on Social Media	

for Personal Data, Hong Kong

# Up-to-Date Guidance Materials/Tips and Training/Workshop



Artificial Intelligence

### Social Media & Smartphones

Dedicated Website on Children Privacy



Guidance for Schools on the Collection and Use of Personal Data of Teachers, Staff and Students during COVID-19 Pandemic (Sep 2020)



#### Guidance for Schools on the Collection and Use of Personal Data of Teachers, Staff and Students during COVID-19 Pandemic

#### Introduction

Although the COVID-19 epidemic in Hong Kong has abated, it is not totally under control yet. As kindergartens, primary and secondary schools will resume classes in phases from 23 September 2020, it is necessary for schools to implement appropriate epidemic prevention measures, which may involve the collection of personal data of teachers, staff and students, including the more sensitive health data. In this regard, the Office of the Privacy Commissioner for Personal Data (PCPD) reminds schools to strike a reasonable balance between safeguarding public health and protecting personal data privacy, and provides the following guidance.

#### 1. Can schools collect temperature measurements, travel histories and other health data of teachers, staff and students?

Collection of temperature measurements, travel histories and other health data of teachers, staff and students assists schools to assess the risk of transmission in schools and safeguard the health of teachers, staff and students. Hence, generally Moreover, under Data Protection Principle (DPP) 1(3)(b)(i) of Schedule 1 to the Personal Data (Privacy) Ordinance (Cap. 486 of the Laws of Hong Kong, PDPO), on or before collecting personal data, schools shall take practicable steps (such as by way of notice) to provide teachers, staff, students and parents with the Personal Information Collection Statement (PICS), stating the kinds of personal data to be collected, the purposes of collection (such as safeguarding the health of teachers, staff and students), and the classes of persons (such as public health authorities) to whom the data may be transferred. It is also a good practice for schools to inform teachers, staff, students and parents of the retention period of the data in the PICS.

#### Can schools use personal data of teachers, staff and students for other purposes or disclose the data to other parties?

Personal data collected from teachers, staff and students by schools should only be used for the original purposes that the relevant parties were informed of (such as safeguarding the health of teachers, staff and students)

### Others

### Guidelines on Children Privacy during the Pandemic (Apr 2020)

#### Media Statement

#### Date:2 April 2020

PCPD Provides Guidelines on Children's Privacy during the Pandemic

Under the principles of "classroom without boundaries" and "suspending classes without suspending learning", many schools have widely used various video conferencing software and online learning platforms to continue teaching, possibly resulting in collection of personal data of individuals. The Privacy Commissioner for Personal Data, Hong Kong (Privacy Commissioner), Mr Stephen Kai-yi WONG provides practical guidelines for schools and parents, reminding them of the potential risks of these software and online platforms, and the appropriate measures to protect the personal data of students and children.

The Privacy Commissioner said, "There are a wide variety of video conferencing software and online learning platforms with high-definition videotaping functionalities in the market. Apart from monitoring students' level of attention during lessons using attention-tracking function, teaching staff may also distribute and collect homework, score grades, etc. through online learning platforms. These online teaching tools can collect a vast amount of students' personal data. Without proper measures to handle those personal data, there would be increased risks of misuse or leakage of personal data. Hackers' attack and malicious use of data for illegal activities may result. These technologies, they should perform due diligence to ensure that technologies they select protect children's privacy, for instance, by ascertaining whether students' personal data would be collected by third parties, such as software developers and platform service providers. Vigilance is called for in the online world at al times to protect personal data privacy, just like what is needed in the real world. Once personal data is published online, it can be duplicated or permanently stored. In serious cases, it may even impact children's future lives as adults."

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# **Other Initiatives Targeting Parents and Teachers**



### **Compliance Check**

#### Media Statement

#### Date: 6 February 2023

Privacy Commissioner's Office's Response to the Incident relating to the Film To My Nineteen-Year-Old Self

The Office of the Privacy Commissioner for Personal Data (PCPD) noted the media reports on the personal data privacy issues relating to the film To My Nineteen-Year-Old Self. The PCPD is concerned about the incident. In order to protect the personal data privacy of the relevant students (as data subjects), the PCPD has taken the initiative to contact the school concerned to ascertain the details of the incident.

Generally speaking, everyone's personal data privacy should be protected and respected, regardless of age. If any person or organisation intends to identify an individual or compile information about a specific individual through shooting a film, this may constitute collection of the personal data of the data subject, and the relevant individual or organisation (as data user) must comply with the requirements of the Personal Data (Privacy) Ordinance and relevant Data Protection Principles (DPPs) when it collects, holds, processes or uses personal data.

With regard to the use of personal data, DPP3 provides that personal data shall not, without the voluntary and explicit consent of the data subject, be used (including the disclosure and transfer of relevant data) for a new purpose other than the purpose for which the data was to be used at the time of the collection of the data or a directly related purpose.

As of today (6 February), the PCPD has not received any complaints or enquiries from the public relating to the incident. Any person who suspects that his or her personal data privacy has been infringed and can provide prima facie evidence (including details about misuse of the personal data) may lodge a complaint with the PCPD.

### ▲ Compliance Check Relating to a Film



**Speaking Engagements** 

### ▲ Education conference





### **Tips for Parents and Teachers**



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## Before We Go... Reaching out to the Community: Privacy Awareness Week 2024



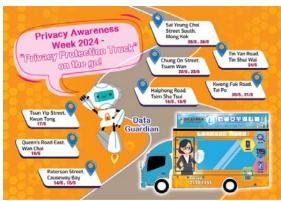


### Safeguard Data Security · Safeguard Privacy!

Activities during the PAW 2024:

- Exhibition Truck "Privacy Protection Truck"
- "Together, We Create a Safe Cyberworld" Webinar
- Seminar on "Lessons from Data Breach Cases and Recommended Data Security Measures"
- Other promotional activities ---









▲ Poster of the Privacy Awareness Week 2024 at a bus shelter

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## **Before We Go...**

Reaching out to the Community: Privacy Awareness Week 2024





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**Data Guardian**, PCPD's new mascot

▲ The mobile exhibition truck: "Privacy Protection Truck"

▲ Students played interactive games on the truck





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# Thank you!

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