Experience Sharing

Protecting Privacy: Navigating the Digital Age Safely

by Elsa Wong

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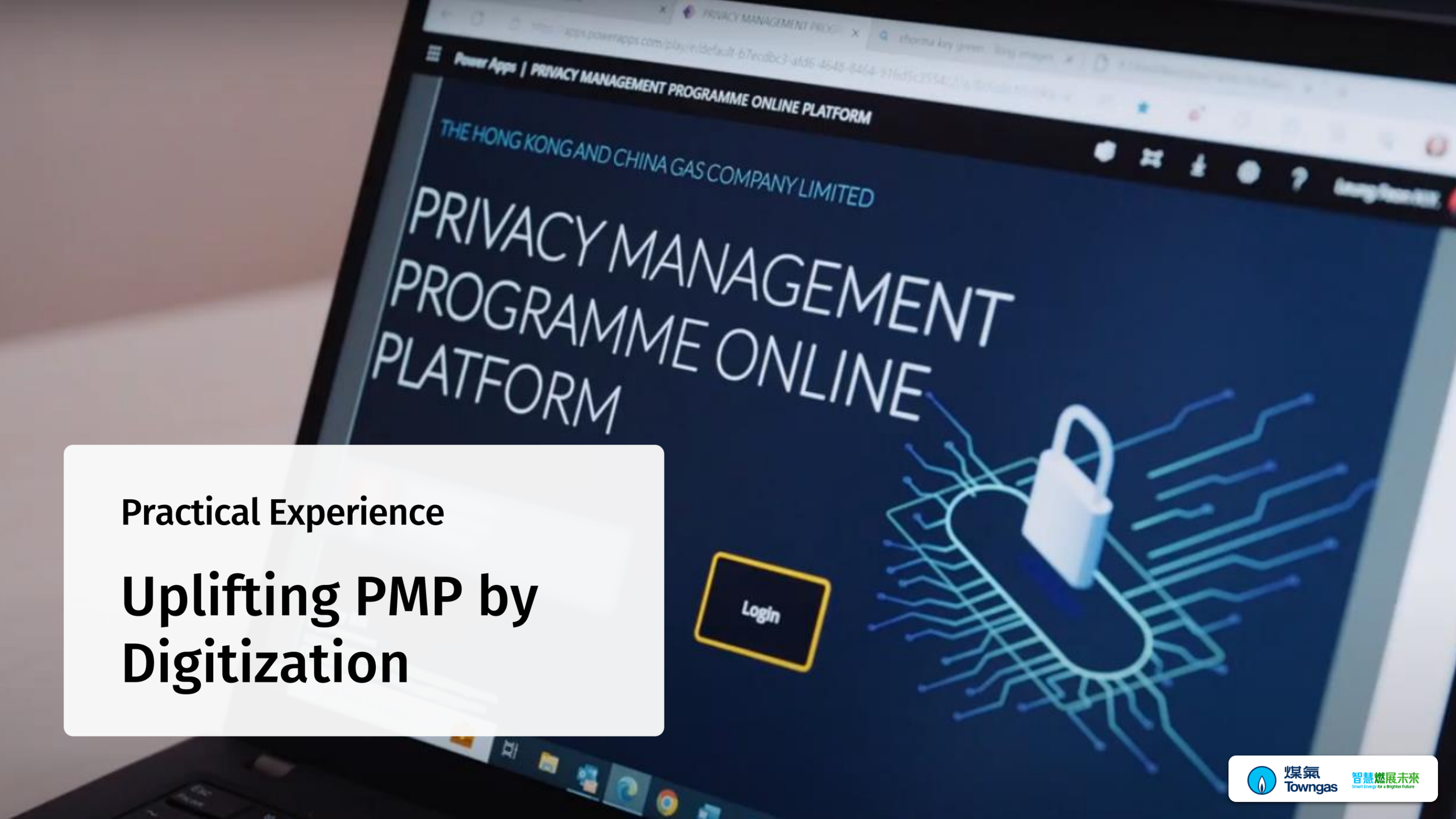
智慧燃展未來
Smart Energy for a Brighter Future

Practical Experience

Uplifting PMP by Digitization



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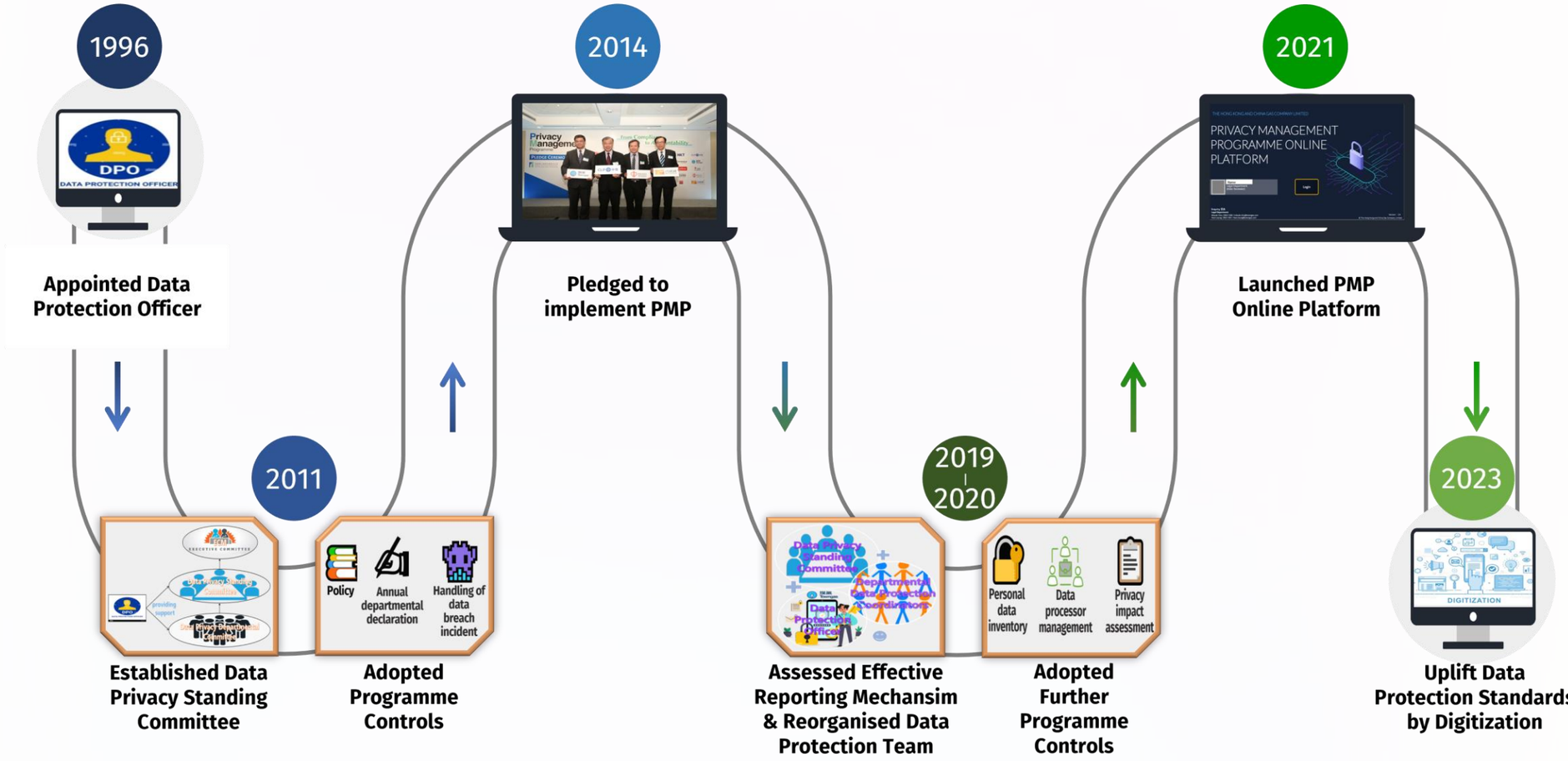
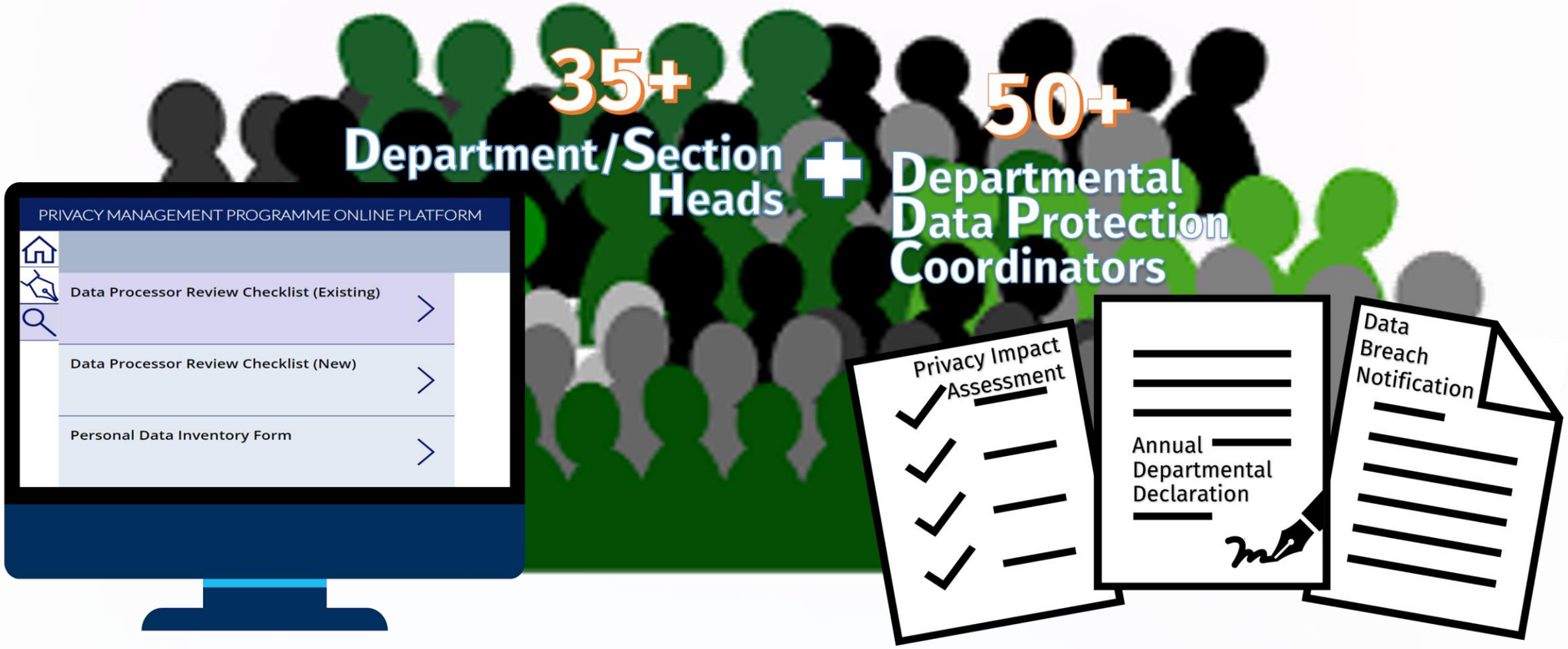
Towngas PMP Development



Key Control Challenges



Feature — Limitations

Content — Partly online; Not user-friendly

Effectiveness — User experience; Response / utilisation rate

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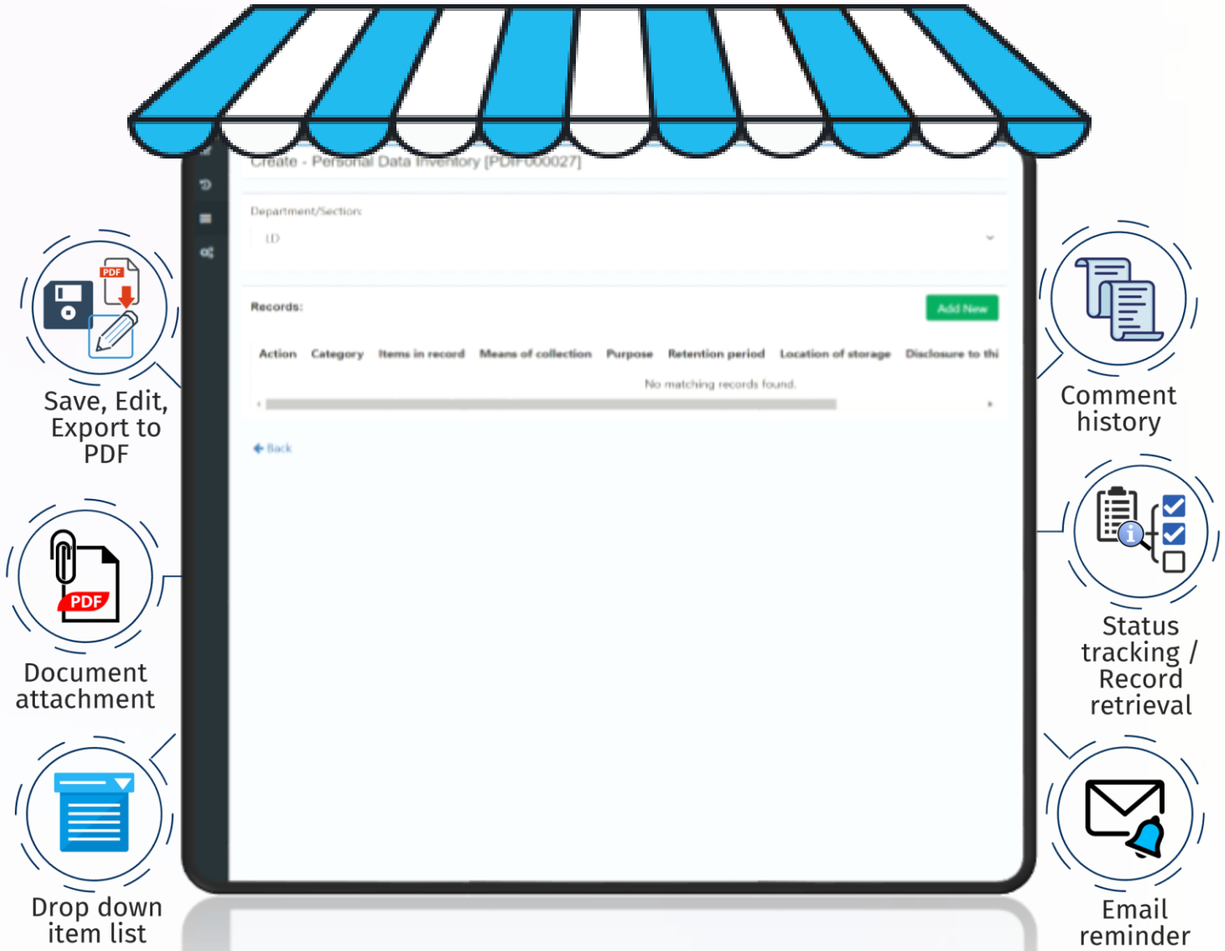
Uplift Key Control Tools

Personal Data Inventory

WHAT ... personal data is processed?

- Submit by each department **annually**
- From open questions to **drop down menu** to select answers



Uplift Key Control Tools

Privacy Impact Assessment

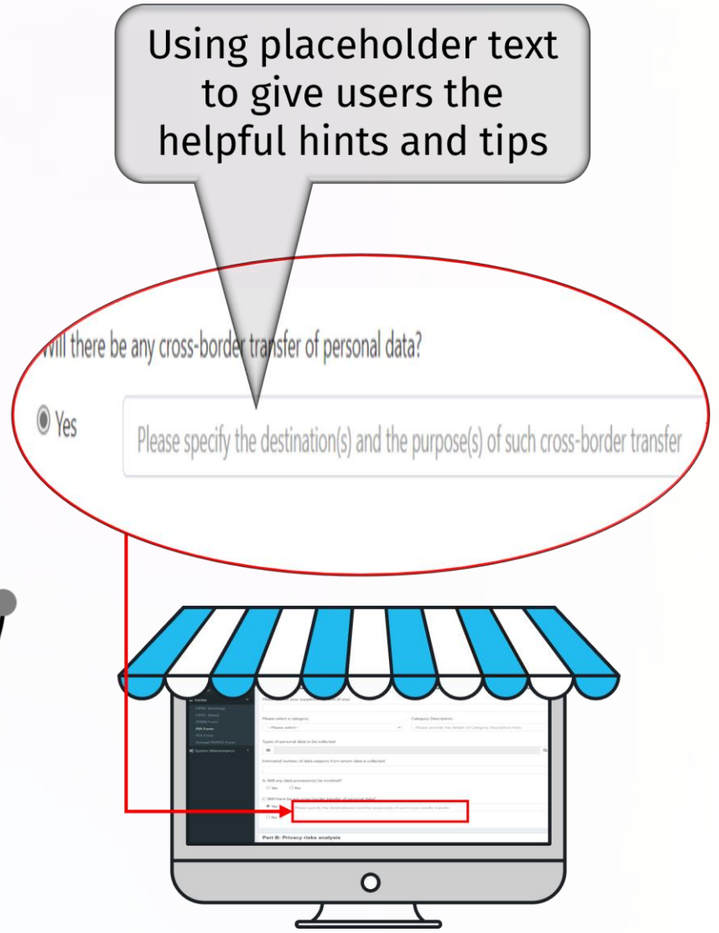
HOW ... it is conducted?

Plan
Consult Legal to confirm the need for a PIA

Analyze
Identify and assess specific risks

Mitigate
Create privacy protective measures for potential risks identified

Report
Record due process for future audits and reviews



Uplift Key Control Tools

Annual Personal Data Privacy Protection Declaration

Periodic Risk Management

Step 1

Conduct annually **departmental risk assessment**

Email reminder by system

Step 2

Complete Form by each department head

Step 3

Identify **any non-compliant issue**

Step 4

Draw up **mitigation measures**

Step 5

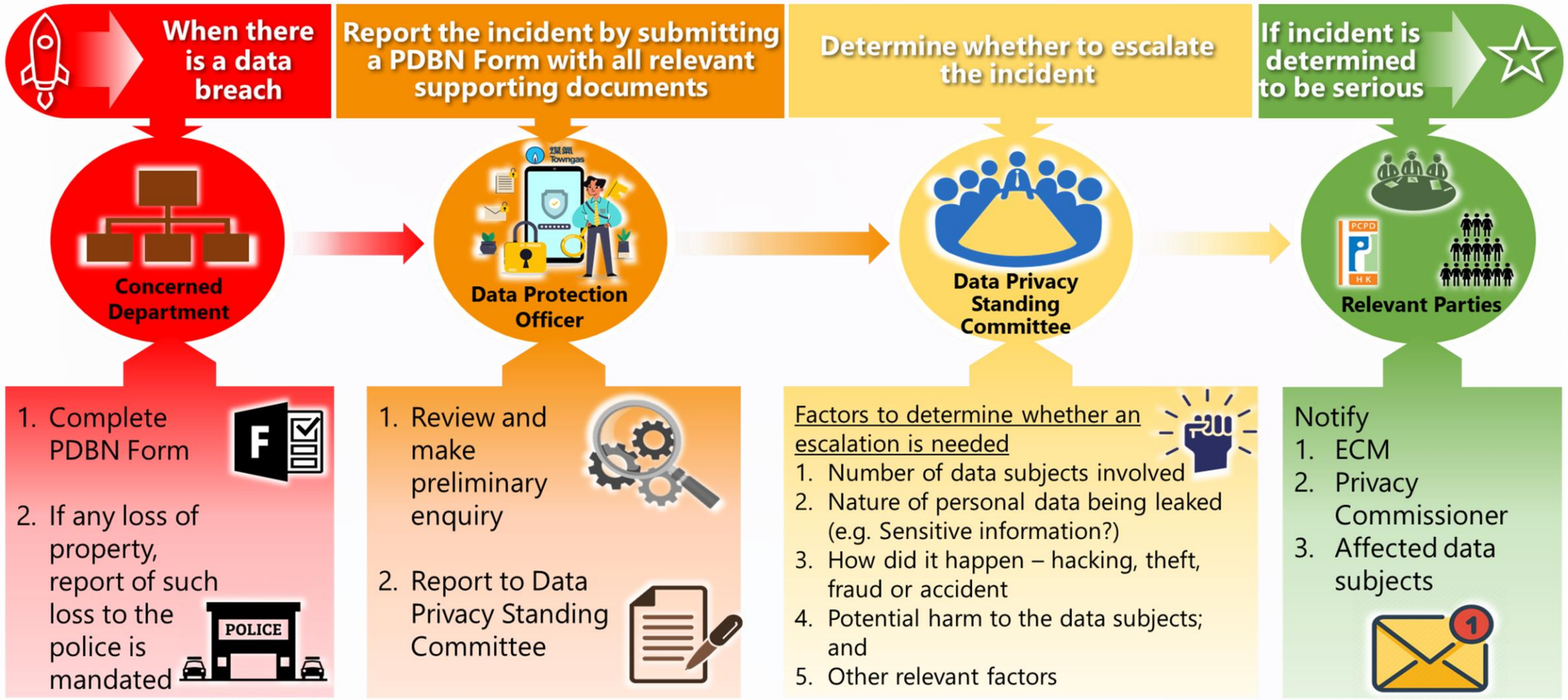
Address **identified risks** and file Form for record

Record retrieval

Uplift Key Control Tools

Handling of Data Breach Incident

How ... data breach is handled?



Uplift Key Control Tools

Incident Management Dashboard

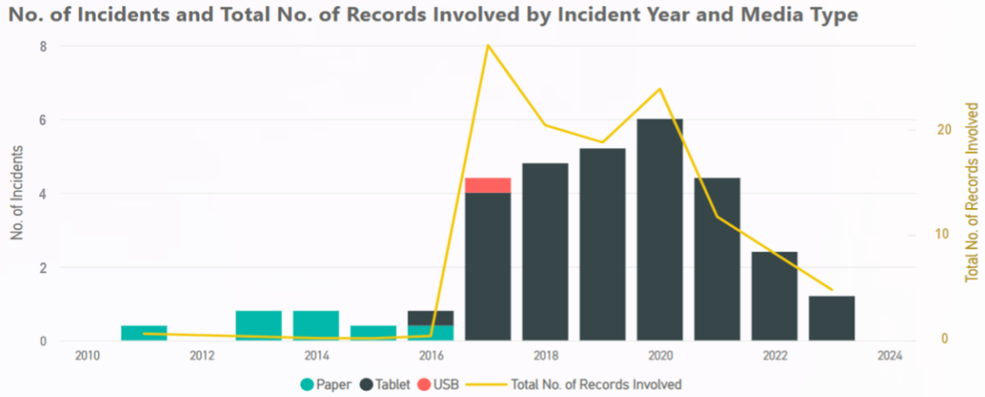
Year

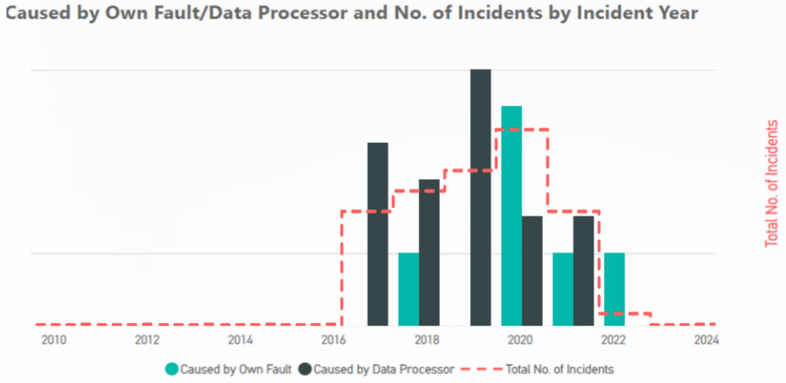
2011 2023

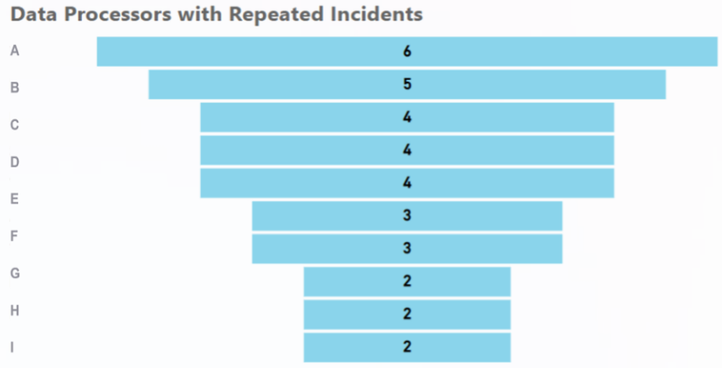
10

Total Incidents

Involved Department	Paper	Tablet	USB	Total
Customer Enquiries & Installation Services		1		1
Customer Enquiries & Residential Installation Services		3		3
Customer Maintenance Services	2	2		4
Emergency Services		1		1
Treasury & Financing			1	1
Total	2	7	1	10







Privacy Safeguards

Implementation of KISS and KISA

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Keep ID Separate and Secure (KISS)

1

Keep Separate in KISS System

Customer ID Number

2

Access is Restricted

Customer Request for Own Gas Account | Internal Staff Request for Operation Needs

3

2-Level Approval is Required

Department Head of Requestor | KISS Data Approver

4

Release KISS Data

Password-protected

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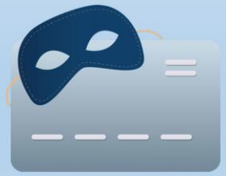
Keep Identity Separate And Accessible (KISA)

Protection

Move Customer Credit Card number to KISA system



Mask Credit Card number, except the first and last 4 digits

Prevention

Only KISA USER access whole number in KISA

Approval to access “KISA – ACCESS LOG BOOK”

Keep record for control or process review

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Cyber Risks Management

How to cope with risks brought by technological developments

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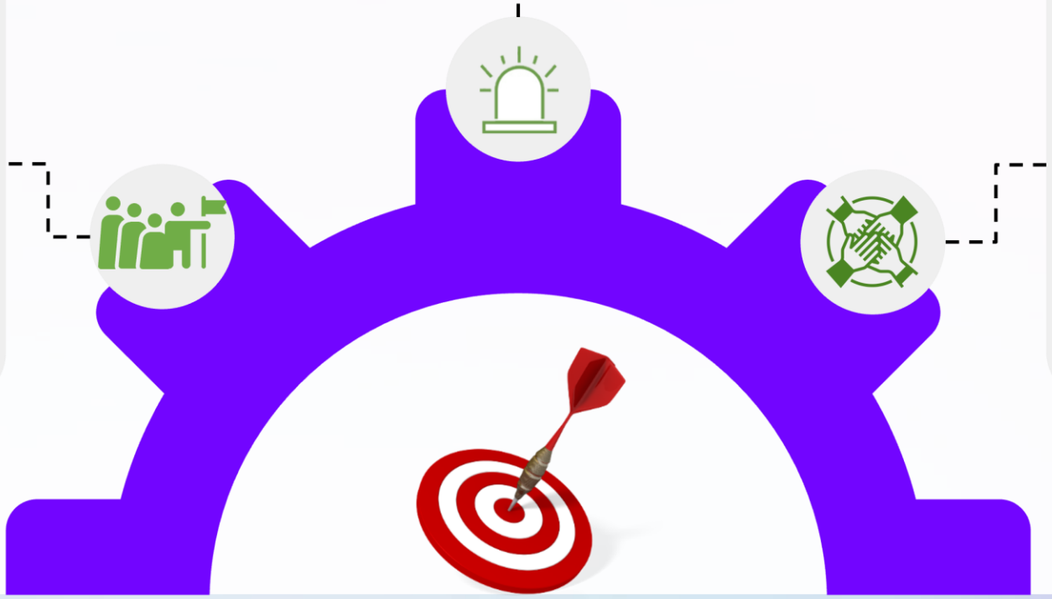
Crisis Management Exercise (Drill 111)

Cyber Security Incident

Data Leakage &
Service Suspension

Objective

Strengthening Collaboration between **Business Units** for **Effective Response**



Participating BU

Group Crisis Mgt Team

BU Crisis Mgt Team

Subject BU Crisis Mgt Team

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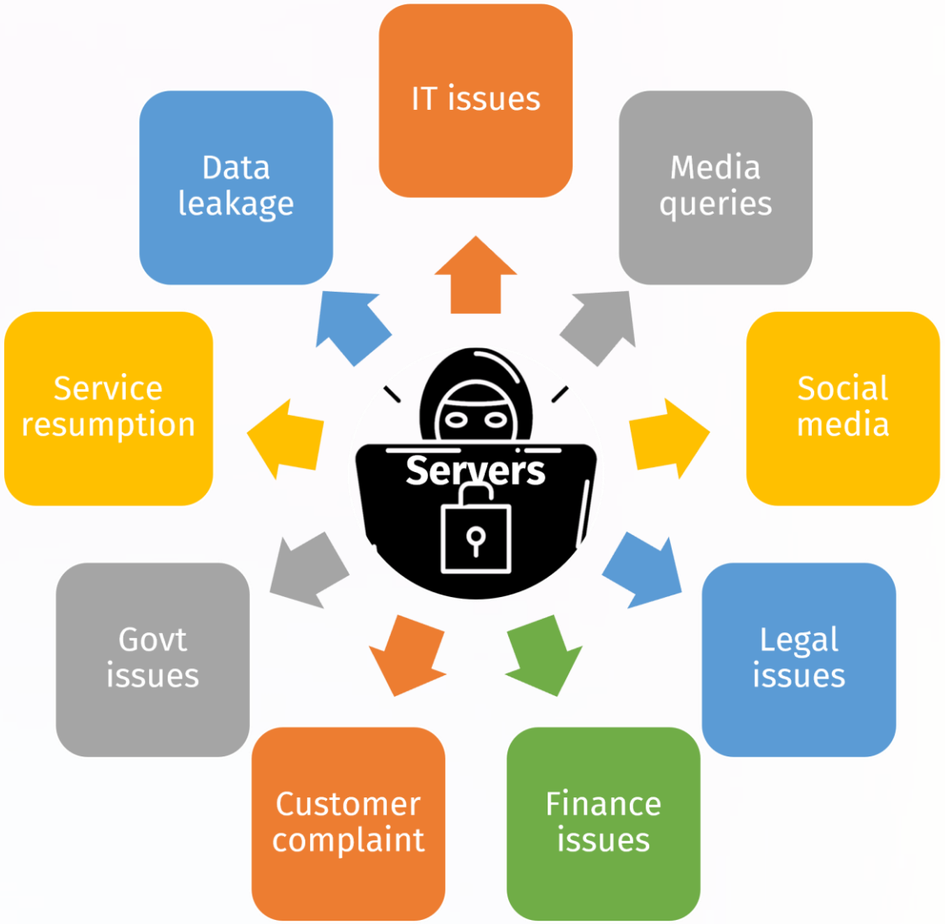
Hacker Attack

Crisis Management Exercise (Drill 111)

11M customers
(73 JVs)

2M customers
(15 JVs)



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Action Taken for Crisis Handling

Crisis Management Exercise (Drill 111)

Server containment to avoid further deterioration

Customer enquiries & complaints

Remote sites recovery for service resumption

Media monitoring & reply

Determine legal liability based on crisis scenarios

Report to governmental bodies (if needed)