

## TAIB

**Para 4.10** "Accuracy obligation" – an organisation must make reasonable effort to ensure that personal data collected and used is accurate and complete. It was highlighted that is not an absolute obligation, TAIB would like to seek clarification on what is "reasonable" and are there proposed penalties for non-compliance of using inaccurate data in the draft PDPO?

**Para 4.12** "Retention Limitation Obligation" – currently under the Record Keeping (Business) Order 2015 there is an obligation to retain records for at least 5 years and in practice, organisations retain records for a much longer period. What is the proposed retention limitation obligation order under the draft PDPO and will this supersede the Record Keeping Order? Are there penalties should an organisation wish to retain records for a longer period? Are there any exceptions – for example when there is an investigation conducted by the authorities?

**Para 5.3** "Right to withdraw consent" – how is the PDPO intended to strike a balance with the requirements of KYC particularly withdrawing consent on collection of a customer's data? This ties in with the "accuracy obligation" under 4.10 where in the event a customer withdraws consent for his updated information to be collected, this will impair an organisation's ability to collect accurate information.