

MAYBANK

Paragraph	Description	Feedback / Comments
3.1	Definition of Personal Data	The paragraph does not specify what type of information are personal data.
		Will there be a certain categories of personal data specified in PDPO?
3.4.6	Business Contact Information	The personal information of connected parties for non-individual customers (e.g. directors, shareholders, authorized signatories) is obtained during the establishment of banking relationship. These connected parties may or may not involved in operating the accounts maintained with banks.
		Are the personal information of connected parties categorized as business contact information? If yes, are banks required to obtain the consent from each of the connected party for maintaining banking relationship?
4.6.6	Standard of Consent	It is stated in the consultation paper that consent is not valid where (a) consent is obtained as a condition of providing a product or service, and such consent is beyond what is reasonable to provide the product or service to the individual..
		Customer is required to sign the TERMS AND CONDITIONS GOVERNING BANKING ACCOUNTS prior to account opening, in which consent is obtained for the disclosure of customer information.
		Will the enactment of PDPO resulting these terms and conditions as null and void?
4.13	The Transfer Limitation Obligation	As a foreign branch operating in Brunei, we are submitting customer information to our Head Office outside Brunei Darussalam for different purposes such as reporting or loan application.
		Kindly share the prescriptive conditions or the requirements under PDPO.
7.2.1 to 7.2.5	These paragraphs outlined the defences in respect of specific offences aimed to hold individual accountable.	Are the defences stated therein also applicable to organisations?
10.6	Sectoral regulators may also exempt their licensees from specific requirements under the PDPO where required.	Is the approval form sectoral regulators suffice for compliance with PDPO?
		Any approval required from the Responsible Authority who oversees and administers the PDPO?