

SCB

1. We note that the intention is to exclude public agencies (Brunei Government) from the scope of the PDPO as they are obligated under the Official Secrets Act. Do the obligations under the Official Secrets Act also extend to collection, processing and storage of personal data and therefore the agencies are expected to observe the same standards relating to collection processing and storage as per the PDPO?
2. On the right to withdraw consent – is this applicable to digital? Where consent are in the form of emails - positive opt in. Operating on the assumption that the right to withdraw consent includes opt out and option to unsubscribe.
3. Please include the type of direct messages that are excluded for DNC registry i.e. messages that is outside of the offer to supply goods/services or opportunities to do so. There may be scenarios where SMS are sent to facilitate transactions or awareness related.
4. Please define “derived personal data” and how this is different from “user activity data” and clarify its limitations.
5. Please clarify the limitations or scope of data on the right to request for access to personal data.