

**Legislative Council Panel on Constitutional Affairs**

**Report on the Work  
of the office of the Privacy Commissioner for Personal Data in 2017**

The Privacy Commissioner for Personal Data (the Commissioner) will brief Members at the meeting of the Legislative Council Panel on Constitutional Affairs on 14 February 2018 on the activities of his office (the PCPD) in 2017. This paper serves to update Members of the PCPD's work in 2017.

**Enquiries**

2. In 2017, the PCPD received a total of 15,594 enquiries, which represented a decrease of 3.6% as compared with 16,180 enquiries in 2016. The enquiries mainly related to the collection and use of personal data (e.g. Hong Kong Identity Card numbers or copies) (30%), employment (11%), and use of personal data in direct marketing (DM) (7%).

3. Internet-related enquiries have increased by 19% from 885 cases in 2016 to 1,057 cases in 2017. They were mainly concerned with cyber-profiling, mobile apps and cyber-bullying.

4. It is believed that one of the reasons for the drop of the number of enquiries last year is the improved awareness of personal data protection and understanding of the protection rights and limits through promotion and education activities; including the publication of a new book in Chinese “Watch out! This is My Personal Data Privacy” and guidelines; keeping abreast of the latest privacy related issues and releasing timely media statements and responses to address public concerns; and updating the award-winning website<sup>1</sup> in a user-friendly manner.

**Complaints**

5. In 2017, the PCPD received 3,501 complaints, which included 1,968 complaints relating to the reported loss of two laptops by the Registration and Electoral Office (the REO incident), representing an increase of 90% as compared with 1,838 complaints in 2016. Taking out the REO incident, the

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<sup>1</sup> See also paragraph 41 below

PCPD received 1,533 complaints in 2017, which represented a decrease of 17% as compared with the 1,838 complaints in 2016.

6. Of the 1,533 complaints received, 64% were made against the private sector (987 cases), 20% against the public sector / government departments (297 cases) and 16% against individuals (249 cases).

7. Among the private sector organisations, the financial industry received the highest number of complaints (210 cases), followed by property management (122 cases) and telecommunications (79 cases).

8. Regarding the nature of the 1,533 complaints, 41% related to the use of personal data without the consent of data subjects (632 cases), 34% related to the purpose and manner of data collection (519 cases), 14% related to the security of personal data (207 cases) and 8% related to data access/correction requests (122 cases).

9. Similarly, the decrease in the number of complaints last year (excluding the REO incident complaints) could be attributed to the increasing public awareness of personal data privacy protection through the PCPD's implementation of a series of result-oriented promotion and education programmes. Moreover, the PCPD took the initiative to engage organisational data users of different industries with a view to assisting them in complying with the Ordinance through inspections, compliance checks, round-table discussions, seminars, workshops, talks and lectures.

## DM

10. In 2017, the PCPD received 186 DM-related complaints, which represented a decrease of 53% as compared with 393 cases (88 of them were filed by the same complainant) in 2016. Common issues in this category included the use of personal data for DM without obtaining the data subject's consent or failing to observe his opt-out request. By the end of 2017, 176 of these cases had been processed and closed while 10 were being considered. Since the new DM-related provisions came into effect in 2013, data users in 11 cases have been convicted of breaching the requirements under the Ordinance. The convictions which would have an adverse impact on the convicted's business reputation would probably also serve as a deterrent for breaching the law.

## CCTV

11. CCTV-related complaints outnumbered those of other areas. In 2017, the PCPD received 197 complaints relating to CCTV, which represented an increase of 140% as compared with 82 cases in 2016. 113 of these cases related to the CCTV footage leakage incident of the Education University of Hong Kong.

## Property Management

12. In 2017, the PCPD received 109 complaints relating to property management, which represented a decrease of 59% as compared with 264 cases (99 cases of which related to the same incident) in 2016. Common issues in this category included the use of property owners' personal data to pursue outstanding management fees, installation of CCTV and collection of visitors' Hong Kong Identity Card number upon entering the premises.

## Use of Information and Communications Technology (ICT)

13. In 2017, the PCPD received 237 ICT-related privacy complaints, which represented an increase of 3%, as compared with 229 cases in 2016. Common issues in this category included the use of mobile apps and social networking websites, the disclosure or leakage of personal data on the Internet, and cyber-bullying (see Annex A).

14. From 2015 to 2017, the PCPD received 15 complaints relating to electronic payment system. Seven of these cases were received in 2017. Common issues in this category included the collection of users' identification documents for identity verification.

## Electioneering

15. In 2017, a total of 1,974 electioneering-related complaints were received, the majority (1,968 cases) of which related to the REO incident. The remaining six complaints were lodged against candidates, an industry organisation and a government department about their collection, use and security of personal data.

16. Having noted the increase of electioneering-related complaints and the imminent Legislative Council by-election, the PCPD revised and issued a

comprehensive guidance entitled “*Guidance on Election Activities for Candidates, Government Departments, Public Opinion Research Organisations and Members of the Public*” in December 2017 to assist candidates and their affiliated political bodies, government departments and public opinion research organisations in complying with the requirements under the Ordinance when carrying out election activities. It also provides advice to members of the public on the personal data protection in this regard. By making references to past complaint cases handled by the PCPD, data protection issues across different stages of election are examined and requirements under the Ordinance are explained in plain language.

### **Enhancement of Operational Efficiency**

17. Annex B summaries the key performance indicators of the PCPD in handling complaints in the past five years. In brief,

- 17.1 the percentage of complaint cases closed within 180 days has increased from 89% in 2013 to 97%<sup>2</sup> in 2017;
- 17.2 the average time taken to conclude simple and complicated cases has shortened from 43 days and 195 days respectively in 2013 to 18<sup>3</sup> days and 85 days respectively in 2017; and
- 17.3 the percentage of complaint cases closed within 45 days without commencing formal investigations has increased from 62% in 2013 to 100% in 2017.

### **Compliance Checks and Compliance Investigations**

18. In 2017, 106 data breach incidents were reported to the PCPD, which represented an increase of 19% as compared with 89 incidents in 2016. As the REO incident in 2017 affected 3.78 million individuals, the number of affected individuals increased significantly from 104,000 in 2016 to 3.87 million in 2017. Taking out the REO incident, the number of affected individuals dropped to 86,000, which represented a decrease of 17% as compared with 2016. The data breach incidents involved the loss of documents or portable devices, inadvertent disclosure of personal data by fax, email or post, hacking, and system misconfiguration, etc.

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<sup>2</sup> The percentage would be 99% if the complaints related to the REO incident are included in the calculation.

<sup>3</sup> The average time would be 7 days if the complaints related to the REO incident are included in the calculation.

19. The PCPD completed 253 compliance checks and one compliance investigation<sup>4</sup> in 2017, as compared with 259 compliance checks and four compliance investigations in 2016.

### **Inspection**

20. In December 2017, the PCPD released an inspection<sup>5</sup> report on the personal data system of an estate agency, and proposed in the report a number of recommendations and good practices based on the elements of a comprehensive privacy management programme for the industry to consider.

### **Enforcement Action and Prosecution**

21. In 2017, the PCPD issued 26 warnings and three enforcement notices on data users as compared with 36 warnings and six enforcement notices in 2016. In response to the PCPD's actions and recommendations arising from the complaints received, all organisations considered the complaints as lessons learnt and took the recommended remedial and improvement actions promptly.

22. During the same period, 19 cases were referred to the Police for criminal investigation and prosecution (as compared with 112 cases in 2016, 88 of them were filed by the same complainant), of which 18 cases related to contraventions involving the use of personal data in DM, and one case related to the offence for disclosing personal data obtained without consent from data users under section 64 of the Ordinance. By the end of 2017, the Police had concluded three out of the aforesaid 19 cases due to various reasons<sup>6</sup>, the remaining 16 cases are still under criminal investigation.

23. The total number of DM prosecution cases in 2017 was four (five in 2016), all of which were referred by the PCPD to the Police between 2015 and 2016. All defendants in the four cases were convicted, including a company director who failed to comply with a summons issued by the Commissioner.

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<sup>4</sup> When the Commissioner has reasonable grounds to believe that there may have been contravention of a requirement under the Ordinance, which involves personal data other than that of the complainant, he may conduct a compliance check against the practice of the data user concerned and/or commence an investigation into the matter on his own initiative under section 38(b) of the Ordinance.

<sup>5</sup> Pursuant to section 36 of the Ordinance, the Commissioner may carry out an inspection of any personal data system used by a data user for the purpose of making recommendations relating to the promotion of the compliance with the provisions of the Ordinance.

<sup>6</sup> They include withdrawal of the case by the complainant and insufficient evidence for bringing prosecution after police investigation.

The other three convictions concerned the use of personal data in DM. The offences related to (i) using personal data of a customer in DM without taking specified actions and obtaining his consent, (ii) failing to inform the customer, when using his personal data in DM for the first time, of his right to request not to use his personal data in DM without charge, and (iii) failing to comply with the requirement from a customer to cease using his personal data in DM. The defendants were fined \$7,000 - \$20,000.

### **Response to Consultations**

24. In 2017, the PCPD provided comments on five proposed legislation and administrative measures, as well as responded to four public consultations that had an impact on personal data privacy. Details are set out in Annex C.

### **Electronic Health Record Sharing System (eHRSS)**

25. After the launch of the eHRSS in March 2016, the PCPD not only dealt with enquiries and complaints related to the eHRSS, but also continued to provide advice on personal data privacy-related issues in relation to the eHRSS to the Government.

26. On 14 March and 31 July 2017, the PCPD was invited to speak before the frontline staff responsible for processing registration for the eHRSS. In addition to a walk-through of the Ordinance and the data breach notification mechanism, the PCPD also shared the take-aways of cases handled with 600 participants.

27. The PCPD, the Electronic Health Record Office and the Hospital Authority are contemplating to launch similar events again in 2018, and planning to expand the scope of targeted participants to cover healthcare providers.

### **Regulating Cross-border Flows of Personal Data**

28. Section 33 of the Ordinance provides a stringent regulatory framework for the transfer of data outside Hong Kong. However, section 33 has yet to be brought into force since its enactment in 1995.

29. To prepare for the commencement of operation of section 33, the PCPD commissioned a consultancy study on providing a methodology and criteria for drawing up a 'white list' of jurisdictions with privacy protection standards comparable to those of Hong Kong, delivered the consultancy report to the

Government and issued a Guidance Note on Personal Data Protection in Cross-border Data Transfer in 2014. Subsequently, the Government engaged a consultant to conduct a business impact assessment for the implementation of section 33 of the Ordinance. During the year, the PCPD rendered comments to the consultant concerning the interpretation, application and compliance issues of the relevant legal requirements under the Ordinance. The consultant delivered its preliminary findings at the meeting of the Legislative Council Panel on Constitutional Affairs held on 15 May 2017<sup>7</sup>. As a follow-up, the PCPD approached the banking and insurance industries to exchange views on the relevant issues identified by the consultant. The PCPD will further study the issues after the release of the consultant's final report.

### **Legal Assistance Scheme**

30. Under the Legal Assistance Scheme, the PCPD may provide assistance to a person who has suffered damage by reason of a contravention of a requirement under the Ordinance by a data user and intends to institute proceedings to seek compensation from the relevant data user. In 2017, the PCPD processed 16 applications for legal assistance. Of these applications, two were granted with legal assistance, six were rejected, four were withdrawn by the applicants and four are being considered.

### **Privacy Management Programme (PMP)**

31. In 2014, the Government, together with 25 companies from the insurance sector, nine companies from the telecommunications sector and five organisations from other sectors, all pledged to implement privacy management programmes. The Hong Kong Association of Banks also indicated that the banking industry supports the initiative.

32. The Government and the PCPD agreed in 2016 to collaborate in engaging an external consultant to assist three government bureaux and departments i.e. the Environmental Protection Department, the Hongkong Post, and the Constitutional and Mainland Affairs Bureau to develop, review, implement and/or refine their PMP Manuals.

33. These three government bureaux and departments are currently reviewing the draft PMP Manuals prepared by the consultant. PCPD would also

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<sup>7</sup> LC Paper No. CB(2)1368/16-17(03)

provide suggestions on the Manuals to ensure they offer adequate protection of personal data privacy.

34. To raise awareness and enhance understanding of personal data privacy protection, the PCPD will reallocate additional resources to help train the data protection officers and other related officers of government departments. In this connection, the Civil Service Training and Development Institute under the Civil Service Bureau has agreed to collaborate with the PCPD to run training sessions for civil servants in 2018. The PCPD will also conduct more professional workshops for public organisations, Data Protection Officers' Club (DPOC) members and members of public. Enhancement will also be made to the online assessment tool. Animation for promoting PMP will be developed and broadcast via online platforms (websites, facebook fan page, Youtube channel etc.) and during other promotional activities.

### **Promotion and Public Education**

35. In 2017, the PCPD conducted 314 professional workshops, talks, seminars and meetings with stakeholders, with a total of 25,038 participants coming from over 430 organisations. 51,050 training hours were recorded. The number of in-house seminars organised upon invitation was 106, the highest number in the past five years, with a total of 16,740 training hours. In addition, the Commissioner was invited to speak and share views on how to strike the right balance between personal data protection and the free flow of information at 135 presentations, seminars, talks and meetings with stakeholders throughout the year, amounting to 25,482 training hours. In 2017, the PCPD also published and revised 13 publications, including guidelines, information leaflets, infographics and annual report, aiming to assist various organisations and industries to understand and comply with the Ordinance and to implement the best practices, and also provide practical tips on privacy protection to members of the public.

36. In 2017, a total of 17 general promotional and education programmes were organised to meet the various needs of individuals (including students and elderly) and organisations, reaching 258,147 participants. Promotion of youth privacy has always been one of the PCPD's priorities. A record-high of 132 schools joined the 2017 "Student Ambassador for Privacy Programme" and became our school partners, with a total of 25,925 participants, being the highest number ever since the Programme was launched. 16 educational talks to senior citizens were also held last year in collaboration with elderly-serving non-



government organisations to help senior citizens recognise potential data privacy risks and share with them the tips on personal data protection in daily life. These talks were attended by 1,120 elderly. For the business sector, the PCPD enhanced the information provided on its main website for small-and-medium enterprises and other industries to raise their awareness of privacy issues. The number of participants of Industry-specific Campaigns in 2017 was 2,657, about the same as that of 2015, with 6,382 training hours recorded. Annex D shows the PCPD's efforts in promotion and public education in the past five years.

37. Following the publication of the book entitled "Personal Data (Privacy) Law in Hong Kong – A Practical Guide on Compliance" in English in 2016, the PCPD jointly published with the City University of Hong Kong Press a book in Chinese entitled "Watch out! This is My Personal Data Privacy", providing a user-friendly guidance on the requirements under the Ordinance, supplemented with inspirational cases, to raise the awareness of the protection of and respect for personal data privacy. A book launch event was held during 2017 Book Fair, in which the Commissioner hosted the talk and introduced the content of the new book as well as the practical points-to-note in privacy protection. The Book won the Merit Award of "Mono / Duotone Color Book" Group under "Book Printing" Category of the 29th Hong Kong Print Awards.

38. In 2017, the PCPD issued 30 media statements and responded to 217 media enquiries. 54 media interviews were conducted, which included data breach incidents or hacking activities (45.6%), CCTV/drones-related (10.6%), and mobile apps and direct marketing (8.7%).

39. The rapid development of big data, artificial intelligence and related technologies in recent years posed challenges to protection of data privacy. Joining the efforts of the Office of the Government Chief Information Officer in organising 2017 International IT Fest, the PCPD hosted "Big Data, Artificial Intelligence and Privacy" Seminar in April 2017, sharing the recent applications of big data analysis and artificial intelligence and looking into the challenges and privacy risks associated with these innovative technologies.

## DPOC

40. In 2017, four seminars were held for the 570-strong DPOC members, including briefings on the trend of technology crime and crime prevention, use of portable storage devices and data breach handling, understanding the Ordinance through sharing of real-life cases and introducing the European Union's General Data Protection Regulation (GDPR).

## Other Promotional Activities

41. To remind members of the public of the importance of privacy protection in the use of ICT, the PCPD launched a new series of educational animated videos in the first quarter of 2017 entitled “Think Privacy! Be Smart Online”, including TV Announcement in the Public Interest (API) and a series of animated videos illustrating how personal data privacy right can be protected in our daily life. Topics of these videos were “Use mobile apps wisely”, “Managing online accounts and passwords”, “Webcam” and “Privacy check-up at social media”.

42. To provide channels for reaching out to the community, the PCPD continued to strengthen and improve the information provided on its main website (PCPD.org.hk) and two thematic websites, “Be SMART Online” and “Children Privacy” in 2017. Following the awards received from the “Web Accessibility Recognition Scheme” in 2016, the “Be SMART Online Thematic Website Enhancement” project won the “Use of Online Tools” category award of the Global Privacy and Data Protection Awards organised by International Conference of Data Protection and Privacy Commissioners in 2017.

43. The PCPD hosted the 39th International Conference of Data Protection and Privacy Commissioners (ICDPPC) from 25 to 29 September 2017. With the theme “Connecting West with East in Protecting and Respecting Data Privacy”, the Conference attracted more than 750 representatives from data protection authorities, the Government and business leaders, information and communications technology professionals, academia and privacy advocates from Hong Kong and over 60 countries or regions for in-depth discussions on emerging issues on data protection, exchanging innovative strategies and ideas as well as addressing future challenges.

44. The five-day Conference consisted of 14 closed sessions for the ICDPPC accredited members and observers, and 15 open sessions attended by all in the data protection community. 25 side events were also organised by some 30 corporations and organisations in the privacy community, offering participants the updates on the latest development of various data protection subjects as well as platforms for exchanging views, sharing experiences and discussing strategies for the ways forward. A total of more than 10,000 training / publicity / education hours were recorded.

45. The PCPD participated in the global Privacy Sweep of the Global Privacy Enforcement Network for the fifth consecutive year. In May 2017, the PCPD examined 30 customer loyalty and reward programmes selected from various sectors (such as retail, catering, hotel and airlines) to evaluate how well consumers could exercise control over their own personal data. Through the Privacy Sweep, the PCPD sought to encourage programme operators to be frank and transparent with their customers with respect to privacy policy and practice, respect their customers' right to personal data privacy and allow the customers' to exercise control over their own personal data (such as request for deletion of data). The PCPD also took the opportunity to educate consumers to consider privacy risks before joining the programmes.

### **Comparative study on the GDPR and the Ordinance**

46. In May 2016, the European Union enacted its new data protection law, the GDPR, which will become effective in 25 May 2018. The PCPD is concluding a comparative study on the GDPR and the Ordinance with a view to identifying the differences. The PCPD plans to publish in the first quarter of 2018 an Information Leaflet to assist organisations in understanding the major disparities in view of the extra-territorial application of the GDPR. Since November 2017, the PCPD has carried out educational activities to raise public awareness on the GDPR.

### **International and mainland connections**

47. The world is increasingly connected, in particular the digital one in which information is borderless and cross-border / boundary data flows increase rapidly. In the circumstances, no data protection authority can work alone to safeguard personal data privacy. The latest developments in the global regulatory landscape (such as the Cybersecurity Law of China and the GDPR of the EU) call in aid the interoperability of data protection regimes.

48. Against the background, the PCPD took advantage of its respectable role in Asia in the past year to engage in different regional and international forums, share its experience and insights in data protection and pick the brains of others. For example, the PCPD has been the executive member of the International Conference of Data Protection and Privacy Commissioners, the Global Privacy Enforcement Network and the Asia Pacific Privacy Authorities (APPA). In APPA, the PCPD is also the convenor of its Technology Working Group. The PCPD also participates in a number of conferences both in the

mainland and overseas in 2017 to share experience and build connections with our working partners.

### **Strategic Focus for 2018**

49. The PCPD notices that the privacy protection landscape is rapidly changing with ICT developments and digitalisation of our economy. Big data analytics, Internet of Things, artificial intelligence and profiling have created unanticipated privacy risks and moral implications. The GDPR, an innovative attempt to regulate the online digital environment, has given new and enhanced rights to data subjects and imposed new obligations on data users (controllers and processors included). PCPD will proactively assist local data users in understanding and complying with data protection regimes overseas, and duly consider the need to establish a comparable framework and mechanism interoperable with international data protection authorities without compromising economic and ICT development.

50. In 2018, the PCPD will take proactive steps to strike the balance between privacy protection and free flow of information, and look closely into the use of ethical framework as an innovative solution to regulate these new disruptive technologies. Special focus will be placed on:

- 50.1 Engaging the business sector (especially the micro, small and medium size enterprises) in promoting the protection and respect of personal data privacy, with a view to enhancing the culture of respect of personal data privacy in the sector;
- 50.2 Strengthening the working relationship with the Mainland and overseas data protection authorities, and explaining the newly implemented rules and regulations on data protection of other jurisdictions to the local stakeholders for compliance with the requirements; and
- 50.3 Providing advice to the Government on initiatives involving personal data privacy.



**Privacy Complaints in relation to Use of ICT**

<b>Year</b>	<b>Use of social networking websites</b>	<b>Use of smartphone applications</b>	<b>Disclosure or leakage of personal data on Internet</b>	<b>Cyber-bullying</b>	<b>Total Number of Cases*</b>
2013	45	22	42	6	93
2014	99	58	57	34	206
2015	90	71	85	22	241
2016	86	61	91	26	229
2017	113	58	65	50	237

\* As a complaint may cut across different categories, figures in the categories added up may exceed the total number of complaints.

## Annex B

### Enhancement of Efficiency in Complaint Handling

	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>
Number of Complaints received	1,792	1,702	1,971	1,838	3,501
Number of Investigations completed	1,783	1,774	1,970	1,967	3,466
Closing a complaint case within 180 days of receipt (% of cases)	89%	95%	96%	96%	97% <sup>#</sup>
Average time taken to settle a simple complaint case (days)	43	30	25	23	18 <sup>*</sup>
Average time taken to settle a complicated complaint case (days)	195	122	87	78	85
Investigations in progress by year-end	352	280	281	152	207
Complaint cases closed within 45 days without commencing formal investigation (% of compliance)	62%	77%	86%	99%	100%

# If the 1,968 REO complaints are included in the calculation, the percentage would be 99%.

\* If the 1,968 REO complaints are included in the calculation, the number of days would be 7.

**Responses to Consultations / Vetting of Bills in 2017**

PCPD provided comments in response to the following proposed legislation and government administrative measures :-

- (1) Financial Services and the Treasury Bureau : Anti-Money Laundering and Counter-terrorist Financing (Financial Institutions) (Amendment) Bill 2017
- (2) Security Bureau : Establishment of a Reporting System on the Physical Cross-Boundary Transportation of Large Quantities of Currency and Bearer Negotiable Instruments
- (3) Food & Health Bureau : Private Healthcare Facilities Bill
- (4) Food & Health Bureau (Electronic Health Record Office) : draft Consultancy Brief for Privacy Compliance Assessment on Electronic Health Record Sharing System
- (5) Commerce and Economic Development Bureau : Consultation on Review of Control of Obscene and Indecent Articles Ordinance

Furthermore, PCPD responded to the following public consultations from the perspective of personal data protection:-

- (1) Public Consultation on Enhancing Transparency of Beneficial Ownership of Hong Kong Companies
- (2) Public Consultation on Strengthening the Regulation of Person-to-Person Telemarketing Calls
- (3) Public Consultation on Proposed Amendments to the 2013 HKIAC Administered Arbitration Rules
- (4) Consultation Paper on Gender Recognition published by Inter-departmental Working Group on Gender Recognition



**Recurrent Promotion and Public Education Work (2017)**

	2013	2014	2015	2016	2017
<b>(I) Professional Workshops, Talks, Seminars and Meetings with Stakeholders</b>					
- Presentations, Seminars, Talks and Meeting with Stakeholders Attended by the Commissioner					
- Number of Activities	28	19	33	81	135
- Number of Participants	2 881	2 595	4 131	13 915	12 741
- Hours	4 321	3 892	6 196	20 872	25 482
- Other Seminars and Training Activities					
- Number of Activities	251	226	243	174	179
- Number of Participants	18 017	12 250	14 577	11 886	12 297
- Hours	34 130	22 987	27 199	22 258	25 568
<b>Total Number of Activities</b>	<b>279</b>	<b>245</b>	<b>276</b>	<b>255</b>	<b>314</b>
<b>Total Number of Participants</b>	<b>20 898</b>	<b>14 845</b>	<b>18 708</b>	<b>25 801</b>	<b>25 038</b>
<b>Total Hours</b>	<b>38 451</b>	<b>26 879</b>	<b>33 395</b>	<b>43 130</b>	<b>51 050</b>

<b>(II) Industry-specific Campaign</b>					
<b>Number of Participants</b>	<b>1 302</b>	<b>1 018</b>	<b>2 473</b>	<b>221</b>	<b>2 657</b>
<b>Total Hours</b>	<b>2 845</b>	<b>2 142</b>	<b>5 408</b>	<b>497</b>	<b>6 382</b>

<b>Total Number of Participants ((I) &amp; (II))</b>	<b>22 200</b>	<b>15 863</b>	<b>21 181</b>	<b>26 022</b>	<b>27 695</b>
<b>Annual Total Hours ((I) &amp; (II))</b>	<b>41 296</b>	<b>29 021</b>	<b>38 803</b>	<b>43 627</b>	<b>57 432</b>

<b>(III) Media Promotion</b>					
- Media Statements	32	31	36	31	30
- Media Enquiries	201	116	147	171	217
- Media Interviews	54	39	59	51	54
<b>Total Number</b>	<b>287</b>	<b>186</b>	<b>242</b>	<b>253</b>	<b>301</b>

<b>(IV) General Promotional Activities</b>					
- Activity 1: Student Ambassador for Privacy Protection Programme - Number of School Partners - Number of Participants	44 4 840	69 7 593	111 16 528	125 5 485	132 25 925
- Activity 2: Privacy Campaign for Elderly - Number of Participants	--	--	--	30	1 120
- Activity 3: Privacy Awareness Week - Number of Participants	1 950	6 123	36 559	56 200	220 116
- Other Activities - Number of Activities - Number of Participants	14 52 189	18 127 727	18 207 136	15 131 545	14 10 986
<b>Total Number of Activities</b>	<b>16</b>	<b>20</b>	<b>20</b>	<b>18</b>	<b>17</b>
<b>Total Number of Participants</b>	<b>58 979</b>	<b>141 443</b>	<b>260 223</b>	<b>193 260</b>	<b>258 147</b>

<b>(V) Data Protection Officers Club</b> - Membership - Regular Meetings/ Publications	357 4	557 4	535 14	588 28	570 28
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<b>(VI) PCPD Websites</b> (Visit per Year)	910 948	665 955	609 652	648 642	1 000 279
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<b>(VII) Information leaflets, guidance notes, infographics, Codes of Practice and annual report issued</b>	19	21	23	21	13
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