

Legislative Council Panel on Constitutional Affairs

**Report on the Work
of the office of the Privacy Commissioner for Personal Data in 2018**

The Privacy Commissioner for Personal Data (the Commissioner) will brief Members at the meeting of the Legislative Council Panel on Constitutional Affairs on 18 March 2019 on the activities of his office (the PCPD) in 2018. This paper serves to update Members of the PCPD's work in 2018.

Data Breach Notifications, Compliance Checks and Compliance Investigations

2. In 2018, 129 data breach incidents were reported to the PCPD, representing an increase of 22% as compared with 106 incidents in 2017. The data breach incidents involved hacking, system misconfiguration, the loss of documents or portable devices, inadvertent disclosure of personal data by fax, email or post, etc.

3. The PCPD took the initiative to conduct 289 compliance checks and four compliance investigations in 2018, as compared with 253 compliance checks and one compliance investigation in 2017, representing 14% and three-fold increases respectively.

Inspection

4. In December 2018, the PCPD released an inspection¹ report on the personal data system of private tutorial services industry, and made a number of recommendations for the industry to consider.

Enquiries

5. In 2018, the PCPD received a total of 16,875 enquiries, which represented an increase of 8% as compared with 15,594 enquiries in 2017. The enquiries mainly related to the collection and use of personal data (e.g. Hong

¹ Pursuant to section 36 of the Personal Data (Privacy) Ordinance (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.

Kong Identity Card numbers or copies) (32%), employment (10%), and use of personal data in direct marketing (6%).

6. Internet-related enquiries decreased by 13%, to 923 cases in 2018, from 1,057 cases in 2017. They were mainly concerned with cyber-profiling, mobile apps and cyber-bullying.

Complaints

7. In 2018, the PCPD received 1,890 complaints, representing a 23% increase when compared with the 1,533 complaints² in 2017.

8. Of those 1,890 complaint cases:

- 71% were made against the private sector (1,334 cases), 12% against the public sector / government departments (220 cases) and 17% against individuals (327 cases);
- in terms of the nature of the complaints, 27% related to the use of personal data without the consent of data subjects (816 cases), 24% related to the purpose and manner of data collection (735 cases), 16% related to the data security (482 cases) and 5% related to data access / correction requests (157 cases).

9. The PCPD completed 1,751 complaint cases in 2018. The PCPD attempted to resolve disputes between the data subjects and the parties being complained against by conciliation as an effective dispute resolution alternative. Among those involved in the contravention of the Personal Data (Privacy) Ordinance (the Ordinance), the PCPD would advise them to take remedial actions in the course of conciliation or investigation so as to reduce any possible damage and prevent the recurrence of similar irregularities in future. Since those parties being complained had followed the PCPD's advice and taken appropriate remedial actions, issuing enforcement notices which would serve the same purpose was not warranted. During the year, out of these 1,751 cases, PCPD made recommendations to the parties being complained in 686 cases, requesting

² The 1,968 stereotyped complaints relating to the same instance of the reported loss of laptops containing personal data of election committee members and electors by the Registration and Electoral Office are not counted.

them to take remedial actions, or guiding them to establish good practice in personal data protection.

10. Among the private sector organisations being complained against, the financial industry received the highest number of complaints (241 cases, which were mainly about data collection, such as unfair collection of personal data by financial institutions), followed by the property management sector (166 cases, which were mainly about the use of personal data, such as posting notices with personal data by owners' corporations) and the transportation sector (166 cases, which were mainly about data security, including 139 cases on Cathay Pacific Airways data leakage incident).

Direct Marketing

11. In 2018, the PCPD received 181 direct marketing related complaints, comparable to 186 cases in 2017. The complaints were mainly about the use of personal data for direct marketing without obtaining the data subject's consent, or data users failing to observe the data subject's opt-out request.

CCTV

12. In 2018, the PCPD received 101 complaints relating to the use of CCTV, as compared with 197 complaints in 2017. Three cases were related to drones (no related cases received in 2017). During the year, the PCPD discussed with relevant government departments on the public consultation on regulation of unmanned aircraft systems. During the year, the PCPD discussed with Civil Aviation Department ("CAD") on the public CAD's proposed consultation on regulation of unmanned aircraft systems ("UAS"), including : 1) rendered advice in meetings with CAD in May 2018 and August 2018 respectively on privacy risks related to UAS and PCPD's guidelines for use of UAS; 2) in Aug 2018, provided more information to CAD on PDPO complaint handling procedure and guidance and training suggestions on the related data privacy issues arising from the use of UAS; and 3) reviewed questions from CAD on privacy issues arising from UAS operation and furnished our responses thereto in Nov 2018 to CMAB for onward transmission to CAD.

Use of Information and Communications Technology (ICT)

13. In 2018, the PCPD received 501 ICT related complaints, representing a 111% increase as compared with 237 cases in 2017. Common issues (there being more than one issue involved in a complaint) in this category included the disclosure or leakage of personal data on the Internet (270 cases)³, the use of social networking websites (156 cases), the use of mobile apps (96 cases) and cyber-bullying (59 cases).

14. It is noteworthy that the number of complaints about the disclosure or leakage of personal data on the Internet in 2018 (270 cases) increased more than threefold (315% increase) versus 65 cases in 2017. The outbreak of the data breaches during the year involving large-scale IT systems had probably aroused public concern about online personal data protection (see Annex A).

Electioneering

15. In 2018, a total of 41 electioneering related complaints were received, the majority of which related to collection and use of the voters' personal data by the candidates and industry organisations in the 2018 Legislative Council By-election.

Enhancement of Operational Efficiency

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

- the percentage of complaint cases closed within 180 days has stood at 95% or above between 2014 and 2018; and
- the average time taken to conclude a bilateral handling complaint case⁴ and a tripartite handling complaint case⁵ has shortened from 30 days and 122 days respectively in 2014 to 21 days and 82 days respectively in 2018.

³ 139 complaints related to the incident of leakage of passengers' personal data by Cathay Pacific Airways.

⁴ This office communicates with the complainant only.

⁵ This office communicates with the complainant and the party being complained against.

Post-investigation Action and Prosecution

17. In 2018, the PCPD issued 16 warnings on data users. 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.

18. During the same period, six cases were referred to the Police for criminal investigation and prosecution. All of these cases were related to the use of personal data in direct marketing.

19. Two cases that were referred to the Police for criminal investigation had resulted in convictions in 2018:

January 2018	A supermarket used the personal data of a data subject in DM without obtaining the data subject's consent. (The first conviction for the offence of section 35E(1)).	Fined HK\$3,000
August 2018	The complainant made an opt-out request to a telecommunication company. Subsequent to her opt-out request, the complainant received two direct marketing calls again from the said company.	Fined HK\$10,000 in respect of each charge; HK\$20,000 in total

Response to Consultations

20. In 2018, the PCPD provided comments on 29 proposed legislation and administrative measures, as well as responded to two public consultations that had an impact on personal data privacy. Details are set out in [Annex C](#).

21. Due to the increased adoption of ICT as part of public organisations (including the government) initiatives, there was a sharp increase in the number of requests received by PCPD in 2018 for comment on various technology related initiatives.

Electronic Health Record Sharing System (eHRSS)

22. The Food and Health Bureau (FHB) commenced Stage Two Development of the eHRSS in July 2017, with a view to developing patient portal and sharing restriction features.

23. In August 2018, the PCPD was invited to attend a meeting with representatives from the FHB and the Hospital Authority to discuss the new features under Stage Two of the eHRSS. During the meeting, the PCPD exchanged views with FHB and Hospital Authority on a number of issues, including data access requests made via the Patient Portal, security and authentication risks of accessing the eHRSS via a mobile app etc.

24. The PCPD will continue to provide advice to FHB on the eHRSS.

Regulating Cross-border Flows of Personal Data

25. Section 33 of the Ordinance which regulates cross-border transfer of personal data has yet to be brought into force. The PCPD has done preparatory work to bring section 33 of the Ordinance into effect including (i) commissioning in 2013 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 and, (ii) issuing a Guidance Note on Personal Data Protection in Cross-border Data Transfer in 2014. Furthermore, the Government engaged in 2016 a consultant to conduct a business impact assessment for the implementation of section 33 of the Ordinance (“BIA Study”). The findings of the BIA Study have already been briefed to the members of the Legislative Council and stakeholders at the meetings held by the Panel on Constitutional Affairs, Legislative Council, on 15 May 2017 and 14 February 2018 respectively⁶. The consultant identified several implementation issues.

26. In November 2018, an international law firm with extensive experience in data protection was appointed by PCPD to advise on overseas’ experience and practices in implementing cross-border data transfer laws and to identify solutions to the implementation issues highlighted in the BIA Study, including

⁶ See the relevant documents of the LegCo (available at <http://www.legco.gov.hk/yr16-17/english/panels/ca/minutes/ca20170515.pdf> and <http://www.legco.gov.hk/yr17-18/english/panels/ca/minutes/ca20180214.pdf>)

the measures or alternatives to be adopted in Hong Kong in preparation for the implementation for section 33 of the Ordinance.

27. The consultancy report will also be considered in the review of the Ordinance.

Legal Assistance Scheme

28. Under the Legal Assistance Scheme (section 66 of the Ordinance), 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 2018, the PCPD processed nine applications for legal assistance. Of these applications, three were granted with legal assistance, three were rejected, and the remaining three cases were being considered. Besides, consequential to a massive data breach incident disclosed by a major airline in Hong Kong in October 2018, the PCPD received a total of 139 complaints as at the end of 2018, of which 54 claimed that they had suffered damage or requested legal assistance. The PCPD will process those requests upon completion of the investigation into the incident, if the complainants provide information showing that they have sustained damage as a result of the data breach.

Privacy Management Programme (PMP)

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

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

31. The PCPD had since maintained close liaison and communications with the consultant and these three government bureaux and departments, providing suggestions on the PMP Manuals to ensure they provide a useful and practical guide to the protection of personal data privacy.

32. Upon the finalisation of the Manuals, the PCPD together with the consultant organised two in-person training workshops for government officers from government bureaux and departments to assist them to develop their own PMP according to their operational needs. Representatives from the sample bureaux/departments also shared their experience and lessons learnt during the implementation of PMP. The two workshops were attended by over 300 government officers from about 40 bureaux and departments.

33. The PCPD issued in 2018 the revised Best Practice Guide on Privacy Management Programme which was a “2.0 version” of the 2014 issue, with concrete examples, charts, templates of questionnaire and checklist for easy deployment.

34. The PCPD will continue to organise seminars and professional workshops on PMP to help organisations construct a comprehensive PMP programme and prepare their own PMP manuals.

Promotion and Public Education

35. In 2018, the PCPD conducted 421 professional workshops, talks, seminars and meetings with stakeholders, with a total of 33,543 participants coming from over 570 organisations. 68,402 training man-hours in total were recorded. The number of in-house seminars organised upon invitation was 123, the highest number ever, with a total of 18,672 total training man-hours. In addition, the Commissioner and his teams were invited to speak and share views in Hong Kong, the mainland and overseas on the evolution of data privacy protection in the digital age, data governance and ethics stewardship values and models, the attributes of Hong Kong for free flow of information and as a regional data hub at 228 presentations, seminars, talks and meetings with stakeholders throughout the year, amounting to 37,512 total training man-hours. The PCPD also published and revised five publications, including guidelines and booklets for all stakeholders including children.

36. In 2018, a total of 18 promotional and education programmes were organised to meet various needs of individuals (including students and elderly) and organisations, reaching 262,145 participants. Promotion of personal data privacy amongst children and the youth has always been one of the PCPD’s priorities. Last year, 106 secondary schools joined the 2018 “Student Ambassador for Privacy Programme” with over 60,000 participants, being the highest number ever since the Programme was launched. The PCPD also

organised a privacy campaign for primary school students, attracting over 94,000 participants to join the activities. In addition, 16 educational talks to senior citizens were held in collaboration with elderly-oriented non-government organisations to raise senior citizens' awareness of potential risks in data privacy. These talks were attended by 1,225 elderly people. For the business sector, the PCPD continued to engage enterprises in understanding and resolving data privacy issues by entering into dialogues and communications directly, and enhancing the information provided on its website for different industries as well as small-and-medium enterprises (SMEs). An industry-specific campaign for SMEs was launched in 2018 to provide all-round support to the SMEs in protecting personal data of customers and staff. The PCPD also set up a dedicated SME hotline and an email inbox, organised talks and launched a radio drama for SMEs - "Get to know more about personal data protection". Annex D shows the PCPD's efforts in promotion and public education in the past five years.

37. In 2018, PCPD witnessed a number of large-scale data breach incidents. The PCPD issued 39 media statements, responded to 184 media enquiries and conducted 92 media interviews. Topics that were of media interest during the year included data breach incidents or hacking activities (44.2%), and CCTV/drones and DM/person-to-person telemarketing calls (9.8%).

Data Protection Officers' Club (DPOC)

38. In 2018, four seminars were held for the DPOC members, which comprised about 600 members, including briefings on the implications of the EU General Data Protection Regulation (GDPR) for employers, privacy and social media marketing, and how to construct comprehensive privacy management programme.

Education and Promotion via Websites

39. The PCPD continued to strengthen and improve the information provided on its website PCPD.org.hk and two thematic websites, "Be SMART Online" and "Children Privacy" in 2018. During the year, a new GDPR section and a mini-website "Elderly Corner" were developed. These websites continued to receive public recognition. The website PCPD.org.hk together with its four thematic website or mini-websites ("Be SMART Online", "Children Privacy", "Think Privacy! Be SMART Online" and "Elderly Corner") won the Gold

Awards by the Website Stream in the Web Accessibility Recognition Scheme 2018/19.

40. The PCPD participated in the global Privacy Sweep of the Global Privacy Enforcement Network for the sixth consecutive year. In October 2018, PCPD invited a total of 44 organisations selected from various sectors (such as insurance, financial, telecommunications, public utilities and transportation) to participate in the Privacy Sweep 2018 to assess how well the 26 participating organisations had implemented the concept of accountability within their organisations, and their ability to manage privacy risk in all business processes. Through the Privacy Sweep, the PCPD sought to encourage data users to adopt ethical standard in data protection.

Comparative study on the GDPR and the Ordinance

41. In May 2016, the European Union enacted its new data protection law, the GDPR, which became effective in 25 May 2018. The GDPR replaced the 1995 EU Data Protection Directive on protection of personal data (**EU Directive**). One of PCPD's statutory functions is to undertake research and monitor the development of overseas data protection regimes. Given that the Ordinance was modelled on the requirements in the OECD Privacy Guidelines 1980 and the EU Directive 1995, and in particular that the GDPR constitutes significant developments of data protection law, and its newly-added extra-territorial application may have an impact on Hong Kong organisations, PCPD conducted a comparative study on the possible impacts brought by the GDPR on local organisations/businesses. In March 2018, the PCPD published a booklet which was distributed to, and well received by, the organisations/businesses.

Data Governance and Data Ethics Project

42. In this digital era, Internet of Things, big data analytics and Artificial Intelligence are becoming increasingly useful for organisations to improve communications, resource allocation, productivity and customer/client satisfaction. At the same time, there are growing concerns over the privacy and ethical risks arising out of these new technologies. Global businesses and regulators are increasingly asking for guiding principles to address these issues.

43. The PCPD commissioned a consultancy to conduct a research study entitled "Legitimacy of Data Processing" for the purpose of achieving ethical

and fair processing of personal data when engaging in advanced data processing activities (e.g. artificial intelligence and machine learning etc.) and by fostering a culture of ethical data governance and addressing the personal-data privacy risks brought about by information and communications technology (ICT) while balancing the interests of all stakeholders. Some twenty organisations in Hong Kong from various sectors, covering banking, insurance, telecommunications, healthcare services, transportation, etc., participated in the project.

44. The report on the research project "Ethical Accountability Framework for Hong Kong, China" was released in October 2018 at the 40th International Conference of Data Protection and Privacy Commissioners in Brussels. Three values are recommended for Hong Kong organisations when carrying out advanced data processing activities: respectful, beneficial and fair. The report also includes useful tools in the form of two assessment models to enable organisations to implement ethical data processing.

45. Globally, governments and data protection authorities alike are advocating the adoption of ethics to address, alongside the relevant laws and legal framework, the ever revolving privacy risks associated with ICT developments. The release of the report provides a useful and deployable framework to Hong Kong businesses to improve their data governance while unleashing the benefits of data.

Review of the Ordinance

46. As the Ordinance shares common features with the now-repealed EU Directives 1995, PCPD had undertaken a detailed research into the GDPR with a view to formulating some observations as a basis for the review and reform of the Ordinance. In late 2018, a few major data security incidents came to light in Hong Kong, highlighting there is room for improvement in the existing data protection law, adding further impetus to the reform of the Ordinance. The PCPD is finalising its review of the Ordinance and will make recommendations to the Government shortly.

Connections outside Hong Kong

47. In the past year, the PCPD continued its efforts in strengthening the connections, communications and co-operations with our counterparts and other stakeholders outside Hong Kong. In 2018, the Commissioner and his delegates

participated in about 20 conferences and seminars in the mainland, Macao and overseas. In addition, the PCPD held two meetings in Hong Kong with the data protection authorities of Singapore and the United Kingdom with a view to strengthening interoperability in data protection.

48. The PCPD has been taking a leading role in regional and international networks of data protection authorities. For example, the PCPD continued serving as an executive committee member of the Global Privacy Enforcement Network, a governance committee member of the Asia Pacific Privacy Authorities (APPA), and the convenor of the Technology Working Group of APPA in 2018. Completing a two-year term as an executive committee member of the International Conference of Data Protection and Privacy Commissioners (ICDPPC) in October 2018, the PCPD joined the newly created permanent Working Group on Ethics and Data Protection in Artificial Intelligence of the ICDPPC, and were selected to be a co-chair of the working group at the inaugural meeting in January 2019.

Strategic Focus for 2019

49. 2018 was a challenging year in personal data privacy protection, both internationally and locally. Internationally, the coming into effect of the GDPR in May 2018 provided an almost trendsetting reference to data protection authorities globally for consideration of how their own legal frameworks might need to be updated for enabling individual data subjects to have greater control of their own personal data. Locally, three major personal data breaches by a major airline, a credit reference service agency and an international hotel chain within a span of five weeks in late 2018 heightened attention on the importance of personal data privacy and that there is room for improvement in the Ordinance. All in all, this is a significant time for data protection and respect for data in the wake of the global changes in the privacy legal frameworks and landscape, as well as increased awareness and public interest in the collection, use, security and access to personal data. Being data users, controllers or processors, public and private organisations need to think and act out of the box of compliance *simpliciter*. Accountability has become the norm for data governance. The PCPD looks forward to continuing to work with all stakeholders, in promoting the ethical standards and stewardship in protecting personal data privacy.

50. In 2019, 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, complementing fair enforcement under the legal framework. Special focus will be placed on:

- engaging the business sector (especially micro, small and medium 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;
- strengthening the work relationships with the mainland and overseas data protection authorities, and explaining rules and regulations on data protection of their jurisdictions to the local stakeholders for compliance with the requirements; and
- facilitating initiatives involving personal data privacy without compromising it as a fundamental human right, including those relating to developing Hong Kong as a regional data hub and a dispute resolution online platform to enhance the development of LawTech and consolidate Hong Kong's position as an international dispute resolution services centre.

Privacy Complaints in relation to Use of ICT

Year	Use of social networking websites	Use of smartphone applications	Disclosure or leakage of personal data on Internet	Cyber-bullying	Total Number of Cases*
2014	99	58	57	34	206
2015	90	71	85	22	241
2016	86	61	91	26	229
2017	113	58	65	50	237
2018	156	96	270 ⁷	59	501

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

⁷ 139 complaints related to the incident of leakage of passengers' personal data by Cathay Pacific Airways.

Enhancement of Efficiency in Complaint Handling

	2014	2015	2016	2017	2018
Number of Complaints Cases received	1,702	1,971	1,838	3,501	1,890
Number of Complaint Cases completed	1,774	1,970	1,967	3,466	1,751
Closing a complaint case within 180 days of receipt (% of cases)	95%	96%	96%	97% [#]	96%
Average time taken to settle a bilateral handling complaint case (days)	30	25	23	18 [*]	21
Average time taken to settle a tripartite handling complaint case (days)	122	87	78	85	82
Number of Complaint Cases in progress by year-end	280	281	152	207	346

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 2018

PCPD provided comments in response to the following proposed legislations and administrative measures listed as follows:-

- (1) Agriculture, Fisheries and Conservation Department : Conservation of Antarctic Marine Living Resources Bill
- (2) Agriculture, Fisheries and Conservation Department : Veterinary Surgeons Registration (Amendment) Bill 2014
- (3) Civil Engineering and Development Department : Privacy Impact Assessment Report for Toll Collection System for Tseung Kwan O – Lam Tin Tunnel
- (4) Commerce & Economic Development Bureau : Statutory Persons-to-Persons Do-Not-Call Register
- (5) Customs and Excise Department : Application of PD(P)O in taking Audio and Video-recording of the counting process of a large amount of cash and bearer negotiable instruments
- (6) Development Bureau : Privacy Impact Assessment Report on Preparatory Work for Traffic Offence Enforcement by Video Analytic Technology
- (7) Electronic Health Record Office : Consultancy Study on Patient Portal and Data Sharing Restriction
- (8) Environmental Protection Department : Installation of CCTV surveillance for enforcement of marine littering
- (9) Food and Environmental Hygiene Department : Installation of 360 degrees cameras at coastal areas
- (10) Food and Environmental Hygiene Department : Installation of People Counting Camera at Public Toilets

- (11) Food & Health Bureau : Voluntary Health Insurance Scheme
- (12) Immigration Department : Privacy Impact Assessment on the System Analysis and Design of the Next Generation Smart Identity Card System
- (13) Immigration Department : Privacy Impact Assessment (Part 2) on the Phase III Implementation of the new Immigration Control System
- (14) Transport Department : Guidelines for Installation of Closed Circuit Television (CCTV) Systems inside Taxi Compartments
- (15) Transport Department : Smart Traffic Control System for Tai Tam Road (Dam Section) Privacy Impact Assessment Report
- (16) Transport and Housing Bureau : Public Transport Fare Subsidy Scheme
- (17) Air Accident Investigation Authority : Applicable exemption provisions under the Ordinance for disclosure of personal data based on health ground
- (18) Education Bureau : “Opt-out Mechanism” for transfer of Personal Data of Children with Special Educational Needs
- (19) Electoral Affairs Commission : Draft Guidelines on Election
- (20) Financial Services Development Council : Account Opening and Know Your Client Utility Scheme
- (21) Home Affairs Department : Provision of Land Licensees’ Contact Information by District Lands Officers
- (22) Hong Kong Housing Authority : Exemption Clause on Requesting other Government Department for Providing Personal Information
- (23) HK-Mainland Joint Working Group : Proposal paper for setting up Hong Kong as a data hub in the Greater Bay Area
- (24) Labour Department : Publication of Adverse Records of Employment Agencies

- (25) Mandatory Provident Fund Schemes Authority : Consultation on Dissemination of Mandatory Provident Fund Information and Messages to Users of e-Enquiry of Personal Account
- (26) Mandatory Provident Fund Schemes Authority : Data privacy issues relating to casual employees of the Industry Scheme under the Mandatory Provident Fund (MPF) System
- (27) Rating and Valuation Department : Acquisition of personal data under the Ordinance
- (28) Transport Department : Application for new electronic payment system in green minibus service
- (29) Transport Department : Consultation on All-in-one Mobile Application “Hong Kong eMobility”

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

- (1) Consultation Paper on Miscellaneous Sexual Offences
- (2) Consultation Paper on Draft Guidelines on (i) Fit and Proper Criteria for Licensed Insurance Intermediaries under the Insurance Ordinance (Cap. 41); and (ii) Continuing Professional Development for Licensed Insurance Intermediaries

Annex D

Recurrent Promotion and Public Education Work (2018)

	2014	2015	2016	2017	2018
(I) Professional Workshops, Talks, Seminars and Meetings with Stakeholders					
- Presentations, Seminars, Talks and Meeting with Stakeholders Attended by the Commissioner and his team					
- Number of Activities	19	33	81	135	228
- Number of Participants	2 595	4 131	13 915	12 741	18 756
- Training Man-Hours	3 892	6 196	20 872	25 482	37 512
- Other Seminars and Training Activities					
- Number of Activities	226	243	174	179	193
- Number of Participants	12 250	14 577	11 886	12 297	14 787
- Training Man-Hours	22 987	27 199	22 258	25 568	30 890
Total Number of Activities	245	276	255	314	421
Total Number of Participants	14 845	18 708	25 801	25 038	33 543
Total Training Man-Hours	26 879	33 395	43 130	51 050	68 402

(II) Media Promotion					
- Media Statements	31	36	31	30	39
- Media Enquiries	116	147	171	217	184
- Media Interviews	39	59	51	54	92
Total Number	186	242	253	301	315

(III) Major Promotional Activities					
Total Number of Activities	20	20	18	17	18
Total Number of Participants	141 443	260 223	193 260	258 147	262 145

Some of the major promotional activities included:

Student Ambassador for Privacy Protection Programme					
- Number of School Partners	69	111	125	132	106
- Number of Participants	7 593	16 528	5 485	25 925	61 429
Privacy Campaign for Elderly					
- Number of Participants	--	--	30	1 120	1 225
Privacy Campaign for Primary Schools					
- Number of Participants	--	--	--	--	94 114

(IV) Data Protection Officers Club					
- Membership	557	535	588	570	577
- Regular Meetings/ Publications	4	14	28	28	28

(V) PCPD Websites (Visit per Year)	665 955	609 652	648 642	1 000 279	1 258 750
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