



## Greater Bay Area data privacy recommended practices

Mainland China's Personal Information Protection Law and Hong Kong's Personal Data (Privacy) Ordinance mandate the proper handling of personal data. Care should be taken when collecting, processing or transferring personal data. Below are some recommended practices.

### Personal data collection

- ▶ Ensure that data is collected for legitimate business purposes only
- ▶ Confine the scope of data collected to only what is necessary for the purposes for which the data is processed
- ▶ Double-check the accuracy of personal data and the authenticity of its source
- ▶ Limit the access right to the minimum number of persons required to discharge the business needs

### Data processing

- ▶ Avoid processing sensitive personal data where it is not required for the purposes for which the data is collected
- ▶ Use or disclose personal data only with the consent of the data owner
- ▶ Notify relevant data subjects when intending to use personal data for purposes beyond the stated purposes of collection and seek the data subject's consent
- ▶ Use, print, exchange and distribute personal data for approved purposes only and in accordance with compliant internal policies

### Data transfer

- ▶ Transfer confidential data only with tools authorized by compliant internal policies and avoid the usage of external tools
- ▶ Encrypt the data before transferring it to external data storing devices
- ▶ When dealing with cross border transfers, ensure that the transfer to the recipient jurisdiction is permitted and compliant with the cross border transfer requirements.

### Data breaches

When employees encounter an actual or suspected personal data breach, data users should:

- ▶ Take prompt actions to give notification of the breach in accordance with compliant internal policies and procedures
- ▶ Take remediation action to address the issues giving rise to the breach



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