



澳門特別行政區政府  
Governo da Região Administrativa Especial de Macau  
個人資料保護辦公室  
Gabinete para a Protecção de Dados Pessoais

UNOFFICIAL TRANSLATION

**Authorization**

**No. 0014/A/2012/GPDP**

**Subject: The Civic and Municipal Affairs Bureau (IACM) applied for data combination between its Customer Relationship Management (CRM) System and the Public Health and Licensing Department (SAL) System in order to receive all the applicant information of administrative licenses and cemetery services**

The IACM applies to the GPDP for an authorization on the combination of personal data for its CRM System to receive information on all administrative license and cemetery service applicants from the SAL System.

According to materials provided by the IACM, the personal data subject to combination shall include the names, addresses, telephone numbers, identity certification document numbers and information of the applications applied to the IACM for services related to the SAL.

According to Article 4(1)(1) of the Law 8/2005 (Personal Data Protection Act, or known as the PDPA), “personal data shall mean any information of any type relating to an identified or identifiable natural person (data subject)”. The said information subject to combination is related to identified or identifiable natural persons and thus regarded as personal data. According to Article 3(1) of the same Law, the processing of information involved shall be subject to the PDPA.

According to Article 4(1)(10) of the PDPA, “combination of data shall mean a form of processing which consists of the possibility of correlating data in a filing system with data in a filing system or systems kept by another or other controllers or kept by the same controller for other purposes”. According to materials provided by the IACM, in order to obtain information from the SAL System, the CRM System will perform synchronization regularly through the internal network and via the program interface. Therefore, through the above-described connection, a data connection is established between two databases of the same entity but for different purposes, complying with the definition of combination as provided in the said law.

According to the IACM, the purpose of information combination on all administrative license and cemetery service applicants is to properly process the information of service applicants centrally kept by the IACM and to avoid repeated preservation of data of the same applicant, so as to ensure data accuracy and integrity.



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According to Articles 22 and 9 of the PDPA, unless the combination of personal data has been specified in the laws or organizational regulations, the data controller responsible for the personal data processing, or the entity jointly responsible for the processing, should apply to the GPDP for an authorization.

After analyzing the information provided by the IACM, the GPDP finds that the CRM System receives information on all administrative license and cemetery service applicants from the SAL System through combination, so that the CRM System can obtain the related updated information in a timely manner and reduce the time and cost of administrative procedures, which is in accordance with the efficiency principle of administrative procedures and meets the e-government policy of the MSAR Government, facilitating quick and effective notification to and contact with the citizens and realizing centralized and proper management of applicant data for uniform consolidation and storage of such data. In addition, the type of information for combination, whether the combination meets the purpose specified in laws and regulations and the proper interests of the entity responsible for the processing of personal data and the fact that the combination should not discriminate or reduce the rights, freedoms and protections of the data subjects all meet Article 9(2) of the PDPA.

To sum up, the CRM System of the IACM receives information on all administrative license and cemetery service applicants from the system of the SAL through combination for centralized and proper processing of applicant data, avoiding repeated preservation of data of the same applicant and ensuring the accuracy and completeness of the information. According to Articles 9 and 22(1)(3) of the PDPA, The GPDP now hereby authorizes the CRM System and the SAL System to process the related personal data through combination for the aforementioned purpose, by guaranteeing the safe processing of such data and without reducing the rights of the data subjects.

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