



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

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## **Authorization**

### **No. 05/A/2017/GPDP**

Subject: CTT's transfer of the personal data of the registered the E-sign Cloud users who applied for the electronic reports produced from the property register and commercial register to the DSAJ

The CTT (*Direcção dos Serviços de Correios e Telecomunicações/Macao Post and Telecommunications Bureau*) and the DSAJ (*Direcção dos Serviços de Assuntos de Justiça/Legal Affairs Bureau*) applied jointly for a data combination, which will allow the personal data of those who applied for or registered for the electronic certificates issued for the electronic written reports (*exposições escritas*) produced from the property register and commercial register. The available information showed that the data to be combined include: user log-in names and passwords, Portuguese or English names, email addresses, names of institutions and the departments or subsidiaries, types of business or profession, professional certificate (*cartão profissionais*) numbers or license numbers, as well as the types of written reports that applied for.

The types of data as mentioned, according to Article 4(1)(1) of Law 8/2005 (Personal Data Protection Act/PDPA), shall mean “personal data” as they concern identified or identifiable natural persons. Article 3(1) of the same Law governs that the PDPA shall apply to the processing of the said personal data.

Article 4(1)(10) of the PDPA laid down that “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”. The information provided by users for signing up the E-sign Cloud will be immediately sent, after the account opening,



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by the CTT's backstage system and through the InforMac to the DSAJ, in order to update latter's database. Through combination as such the databases of these entities establish continuous data exchanges, which fulfill the definition of "data combination" as laid down in the PDPA.

According to the information submitted for the application, the purposes of the data combination aimed at processing the application information with regard to the written reports produced from the property register and commercial register, verifying the applicants' identities and supervising the application process.

Under Article 9 and 22 of the PDPA, combination of personal data not provided for in a legal provision or a provision of a regulation of an organic nature shall be subject to the authorization issued by the Office for Personal Data Protection (GPDP). Such authorization should be applied by the controller or jointly by the corresponding controllers.

The said data combination will allow the DSAJ to obtain timely information and reduce the time and costs of administrative procedures, which are in line with the principle of efficiency and the E-government policy adopted by the MSAR Government. Taking into account the types of data for combination, whether the combination is in line with the purposes outlined in laws and regulations, and the legitimate interests of the controllers of the data processing—inasmuch as the combination does not curtail or discriminate the rights, freedom and safeguards provided to the data subjects—the combination fulfils the requirement of Article 9(2) of the PDPA.

The CTT will transfer, through data combination, the personal data of those who applied for or registered for the said electronic report services to the DSAJ, so that the latter could process the online applications of the written reports produced from the mentioned two registers. This combination will also help the DSAJ verify the



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applicants' identities and supervise the respective procedures. Consequently the GPDP, according to Article 9, 22(1)(3) and 24 of the PDPA, hereby authorizes the CTT and DSAJ, for the mentioned purposes and without discriminating the data security of the processing and reducing the rights of the data subjects, to conduct data combination of the aforesaid personal data. Details of the current Authorization is as follows:

1. The data controllers:
  - (1) Macao Post and Telecommunications Bureau; Portuguese: *CTT/Direcção dos Serviços de Correios e Telecomunicações*; address: *Largo do Senado, Edifício Sede dos CTT, Macau*;
  - (2) Legal Affairs Bureau; Portuguese: *DSAJ/Direcção dos Serviços de Assuntos de Justiça*; address: *Rua do Campo, n.º 162, Edifício Administração Pública, 15.º- 20.º andares, Macau*.
2. Types of data subjects: those who applied for or registered for the services of electronic certificates issued for the online application of written reports.
3. Types of personal data to be processed: account login names and passwords, Portuguese or English names, email addresses; names of institutions and the departments or subsidiaries, types of businesses or professions, professional certificate numbers or license numbers, as well as the types of written reports applied for.
4. Purposes of the processing: processing the online applications of the written reports produced from the property register and commercial register, verifying the applicants' identities and supervising the application processes.
5. Types of data recipients: no data recipients.



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6. How the data subjects exercise their right to access and right of rectification: all direct.
7. Intended data transfer to any third countries: none.

Coordinator  
Fong Man Chong  
May 31st 2017