

Office for Personal Data Protection

Annual Report 2014

Unofficial English Translation

Disclaimer

This is an unofficial English translation of some major chapters in the Annual Report 2014 of the Office for Personal Data Protection. It does not include any legal documents published in the Annual Report, namely Opinions and Authorisations. Please visit the Office's website www.gdp.gov.mo to get some of their available translations.

We regret that a full English translation of the Annual Report is not provided. Please note that the official languages in Macao SAR are Chinese and Portuguese. You should not act or rely on any unofficial English translation of legal documents without seeking legal advice when appropriate.

Office for Personal Data Protection
Government of Macao SAR
July, 2015

Introduction

Privacy has long been internationally recognized as one of the basic human rights. The increasing privacy data leaks and disputes around the globe have recently shaken up the public that even scatters of personal data, when combined with the new data medium and placed under media – the catalyst of public engagement, can form profuse and agitating privacy invasion. The value of privacy should never be overlooked and privacy protection has tapped into perception while countries formulating their own policies.

The focus of personal data processing has long been directed at traditional storing methods like actual printing records and storage, which also made the personal data discussions, in the past, revolving around processing methods, security measures, etc. With the advent of time, evolving technologies also brought challenges to personal data protection—not only to the potential risks caused by changes of data medium, but also those formed by new processing technologies, data transfer and data publication.

Amongst the cases handled last year, some of which involved trans-border data processing like overseas direct marketing, inappropriate publication of personal data on social networking sites, etc. In addition, quite a number of advanced technologies also invoked privacy disputes, causing well worth reconsideration and heeding in particular.

In recent years, with the prevalence of internet and smart devices, the big data era also arrived. New technologies also delimit the boundaries of traditional communications and opened up new boundlessness. On the other hand, technological development also left the door open to numerous perplexing problems caused by big data. Everyone's privacy is inevitably prone to invasion and is covered with obscure problems like data owners, processing legitimacy, etc. Underneath these issues are grey areas and conflicts, which are exacting challenges to personal data authorities worldwide.

In face of the new trends, it is necessary to keep abreast of technological advances and the respective challenges. Numerous countries and regions have already noticed the risks posed by information technologies, and therefore are currently establishing new legal provisions and improving technologies to prevent the problems run riot. The GPDP, being the data protection authority of Macao, also realized the importance between technological development and personal data protection. To this, we have

already strengthened the technological means and organizational status, in order to cope with the international trends aiming at a more effective privacy protection system.

In addition to hardware upgrade, soft power is also a way to plug privacy loopholes. Looking back to 2014, the number of enquiries and initiated investigations showed the public has attached great importance to personal data protection. The general public also actively sought GPDP's opinions on personal data protection issues. The reasons behind could be the community's unclear understandings on the nature of personal data and also the apprehension about processing principles. These illustrated the continuous need of education on personal data protection. Looking forward, the GPDP will introduce progressive, professional education to the public, and this will become one of GPDP's future key initiatives. The future works aim to intensify general public's awareness of personal data and to equip the community with better knowledge on safeguarding their own personal data.

Fong Man Chong
Coordinator

Main activities

February 2014

- Press conference publishing investigation results and review of the 2013 initiatives

April 2014

- Seminar on E-Government and Data Security
- Trends of Personal Data Protection Seminar
- Seminar co-organized with the Health Bureau: Electronic Health Record System and Personal Data Protection—Portugal's Experience
- Chinese Slogan Competition on Personal Data Protection for Students

May 2014

- Seminar on Personal Data Protection and Security for Apps, in conjunction with the launch of the Privacy Week 2014
- Seminar of the Personal Data Protection of Apps, co-organized with the Faculty of Law of the University of Macau
- Privacy Week 2014—Apps and Personal Data Protection
- Seminar on the Use of Public Registry Information

June 2014

- Personal Data Protection Act and Information Security Management Seminar, co-organized with the Macau Productivity and Technology Transfer Centre
- Attending the 41st Asia Pacific Privacy Authorities (APPA) Forum

July 2014

- Seminar on Cross-Border Data Transfer and Data Security
- Korea Internet & Security Agency visited the GPDP

August 2014

- Attended the APEC Electronic Commerce Steering Group Meetings as guest
- Personal Data Protection Act and Information Security Management Seminar, co-organized with the Macau Productivity and Technology Transfer Centre

October 2014

- Attended the current affairs program *Call In Macau* (澳門開講)
- Seminar on Mobile Application Development Guidelines, co-organized with the

Macau Productivity and Technology Transfer Centre

- Attended the 36th International Conference of Data Protection and Privacy Commissioners as observer
- Seminar on Data Security and Trends in Credit Card Crime, co-organized with the Macao Judiciary Police and the Payment Card Association of Macao

November 2014

- GPS Vehicle Positioning Device and Personal Data Processing Seminar
- Macao Internet Governance Forum 2014—APPS Information Security and the Right of Privacy, co-organized with the Macao Polytechnic Institute, Macau Productivity and Technology Transfer Center (CPTTM), and the Macao Network Information

December 2014

- Attended the 42nd Asia Pacific Privacy Authorities Forum

Enquiries and complaints

I. Legal enquiries

In 2014, the GPDP received a total of 1936 enquiries about personal data processing (excluding those of daily procedures). Most of these enquiries related to authorizations and notifications, up to 40% of the total, and another 28.9% were made up of enquiries relating to personal data processing legitimacy. The majority of the enquiries, around 88.3%, were made by phone. In terms of the categories of enquiring parties, most of them were private entities and individuals, amongst which the former accounting for 47.4% and the latter 39%.

Categories of enquiries by nature

| Case nature | Number of cases |
|--|-----------------|
| Scope of application and definitions of the PDPA | 441 |
| Nature and principles of data processing | 323 |
| Legitimacy of data processing | 560 |
| Rights of data subjects | 330 |
| Security and confidentiality of data processing | 99 |
| Data combination | 68 |
| Data transfer | 139 |
| Notifications and authorizations | 775 |
| Consequences of law breaching | 33 |
| Guidelines prepared by the GPDP | 93 |
| Rights to privacy provided for by other laws | 46 |
| Video surveillance | 427 |
| Simplified applications | 209 |
| Others | 146 |

Note: Some enquiries are of mixed nature.

Means of enquiry

| Means of enquiry | Number of cases | Percentage |
|---------------------------|-----------------|------------|
| Phone | 1709 | 88.3% |
| Online (online enquiries) | 68 | 3.5% |
| Online (email) | 47 | 2.4% |
| Personal visits | 109 | 5.6% |

| | | |
|----------|---|------|
| Mail/fax | 3 | 0.2% |
|----------|---|------|

Categories of enquirers

| Categories of enquirers | Number | Percentage |
|-------------------------|--------|------------|
| Public institutions | 263 | 13.6% |
| Private institutions | 917 | 47.4% |
| Individuals | 756 | 39% |

Increment of enquiries

| Year | Number of cases |
|------|-----------------|
| 2007 | 43 |
| 2008 | 207 |
| 2009 | 602 |
| 2010 | 704 |
| 2011 | 740 |
| 2012 | 990 |
| 2013 | 2276 |
| 2014 | 1936 |

II. Case investigation

The GPDP investigated a total of 194 cases in 2014, a 37.6% rise over the 141 cases of 2013. Along with the 97 cases from 2013, the GPDP investigated 291 cases, of which 143 were closed (80 cases carried over from 2013 and 63 cases initiated in 2014). Of the 194 new cases which were initiated in 2014, 63.4% related to illegitimate data processing, 26.8% about breaching data processing principles, and 74.2% stemmed from data subjects' complaints. Of the parties investigated, private institutions accounted for the majority, in a total of 59.6%. In regard to the 143 closed cases, 16.8% of which were concluded with punishment imposed, whereas 37.1% were concluded with recommendations for improvement.

Investigated cases by nature

| Nature of cases | Number of cases |
|---|-----------------|
| Breach of confidentiality obligations | 8 |
| Lack of security precautions | 18 |
| Failure to secure data subjects' rights | 39 |
| Violating data processing principles | 52 |
| Lacking legitimacy in data processing | 123 |
| Undue access | 5 |
| Others | 27 |

Note: Some of the investigated cases are of mixed nature.

Reasons of investigations

| Investigated cases by ways of instigation | Number of cases | Percentage |
|---|-----------------|------------|
| Complaints | 144 | 74.2% |
| Reports | 29 | 14.9% |
| Referral | 12 | 6.2% |
| Active intervention | 9 | 4.6% |

Categories of investigated parties

| Categories of investigated parties | Number and frequency/ person-time | Percentage |
|------------------------------------|-----------------------------------|------------|
| Public entities | 22 | 8.3% |
| Private entities | 158 | 59.6% |
| Individuals | 85 | 32.1% |

Note: Some of the cases involved more than one party investigated.

Categories of private entities investigated

| Categories of private entities investigated | | Number of entities involved in investigation |
|--|--|--|
| Commercial enterprises | Public enterprises (excluding telecommunication and media organizations) | 0 |
| | Gaming | 22 |
| | Hotel | 7 |
| | Catering | 0 |
| | Travelling agencies | 0 |
| | Finance | 7 |
| | Insurance | 3 |
| | Postal | 0 |
| | Telecommunication | 14 |
| | Property management, cleaning and security | 7 |
| | Health and hygiene | 3 |
| | Social Services | 0 |
| | Education | 5 |
| | Media | 2 |
| | Publishing and printing | 0 |
| | Culture and art | 0 |
| | Information services | 0 |
| | Lawyer | 0 |
| | Accountant and auditor | 0 |
| | Promotion, counseling | 12 |
| | Manufacturing | 0 |
| | Architecture | 5 |
| | Wholesale and retail | 23 |
| Real estate (property) | 6 | |
| Personal service | 15 | |
| Other commercial enterprises | 8 | |
| Associations, non-profit organizations and the likes | | 9 |
| Others | | 10 |

Note: Some of the cases involved more than one party investigated.

Results of concluded cases

| Results | Number of cases | Percentage |
|---|------------------------|-------------------|
| Penalties | 24 | 16.8% |
| Recommendations for improvement | 53 | 37.1% |
| Facts inconsistent with the allegation | 1 | 0.7% |
| Lack of evidence | 40 | 28% |
| Withdrawn at the request of the data subjects | 3 | 2.1% |
| Beyond GPDP's competence | 23 | 16.1% |
| Others | 9 | 6.3% |

Increment of investigated cases

| Year | Number of cases |
|-------------|------------------------|
| 2007 | 22 |
| 2008 | 35 |
| 2009 | 47 |
| 2010 | 63 |
| 2011 | 86 |
| 2012 | 118 |
| 2013 | 141 |
| 2014 | 194 |

Law enforcement

I. Follow-ups on applications

In 2014, applications for personal data processing submitted: 59 applications for opinions, 45 applications for authorizations and 608 notifications on personal data processing (239 of which concerned simplified notifications, 168 concerned transferring personal data outside Macao SAR and 201 notifications of other types of personal data processing).

Types of applications for personal data processing

| Application Category | Number of cases |
|--|-----------------|
| Notifications: | |
| Simplified notifications | 608 |
| Notifications of transfer of personal data outside Macao SAR | 239 |
| Notifications of other types of personal data processing | 168 |
| | 201 |
| Applications for authorizations | 45 |
| Applications for opinions | 59 |

1. Opinions issued

The GPD received a total of 59 requests for opinions in 2014, a 78.8% increase from the 33 cases in 2013. In addition to the three requests carried over from 2013, altogether there were 62 requests processed, 57 of which were concluded.

Of the 59 requests for opinion in 2014, 42 were from public institutions, the rest were submitted by private institutions.

Increment of applications for opinions

| Year | Number of cases |
|------|-----------------|
| 2007 | 27 |
| 2008 | 35 |
| 2009 | 35 |
| 2010 | 24 |
| 2011 | 32 |
| 2012 | 40 |
| 2013 | 33 |
| 2014 | 59 |

2. Authorizations issued

In 2014, the GPDP received 45 applications for authorization, 38 of which concerned personal data combination. Of these applications, 35 were submitted from public institutions, as opposed to 10 from private institutions. Year 2014 saw an 18.4% increase of the number of applications over the 38 applications of 2013.

Taking into account of the 15 applications carried over from 2013, 60 applications were processed and 31 were completed. Amongst these, 12 authorizations were issued during the year. Some of the applications, as examined and closed, proved not involving personal data combination or authorization of other sorts.

Authorization applications

| Year | Number of cases |
|------|-----------------|
| 2007 | 15 |
| 2008 | 152 |
| 2009 | 25 |
| 2010 | 28 |
| 2011 | 24 |
| 2012 | 27 |
| 2013 | 38 |
| 2014 | 45 |

3. Notifications of personal data processing received

In 2014, the GPDP received a total of 608 notifications of personal data processing (including 239 for simplified notifications, 168 notifications for transfer of personal data outside Macao SAR and 201 for other types of personal data processing). The number of notifications of personal data processing decreased when compared with the 976 notifications of 2013, mainly due to the enhanced efforts made to promote notifying personal data processing conducted by simplified notifications for video surveillance system for security reasons. Such measures significantly increased the number of simplified notification to 644.

Along with the 168 applications carried over from 2013, the GPDP had 776 personal data processing notifications to handle, of which 641 were concluded. Of the simplified notifications received in 2014, one was from public institutions and 238 from private entities and individuals. With regard to notifications of personal data transfer outside Macao SAR, 19 were filed by public entities, and 149 by private ones. As to notifications regarding other types of personal data processing, 70 were submitted by public institutions, and 131 by private institutions and individuals.

Increment of notifications of personal data processing

| Year | Number of cases |
|------|-----------------|
| 2007 | 68 |
| 2008 | 216 |
| 2009 | 359 |
| 2010 | 361 |
| 2011 | 125 |
| 2012 | 291 |
| 2013 | 976 |
| 2014 | 608 |

II. Coordination and promotion of law enforcement

1. Guidelines

Being the enforcement authority that monitors and coordinates the implementation of the PDPA in Macao, the GPDP, when appropriate, issues different guidelines to regulate the data processing of different areas, so that the PDPA is further complied by the general public. Considering the popularity of apps and the possibilities of personal data collection by mobile apps, the GPDP, in 2014, produced the *Guidelines for Apps Development*. The Guidelines will provide apps developers and operators with better knowledge of the facets of data processing through mobile apps. As a consequence, the concerned stakeholders can avoid violations of the PDPA and public awareness is raised for the protection of personal data and apps users are better informed of their rights.

2. Authorizations for the simplification of notification

The GPDP continues to streamline administrative procedures and in 2014 published Authorization No. 01/2014, the Simplified Notification for the Personal Data Processed by Vehicle Positioning Systems and Devices. This Authorization facilitates the simplified notification procedures, as required by laws, conducted by private and public entities for their data processing aimed at specific purposes and the scope laid down by the Authorization. Moreover, this move also enhances a better registration system of personal data processing notification.

3. Continuous improvement of the Network of Personal Data Protection Officers of Public Departments

To strengthen the communications relating to personal data processing with other public departments, the GPDP in 2013 established the Network of Personal Data Protection Officers of Public Departments. In 2014, this Network organized a number of sharing sessions, information exchanges and seminars. Through these activities, the PDPA was further promoted. Until the end of 2014, a total of 188 network officers from 69 public departments joined the Network.

4. Translation of international reference documents

As Macao shares the same roots of European civil law, Macao also draws on the experience of personal data protection of EU, as a way to better implement privacy protection in the local community. To this, the GPDP, according with the actual situations of Macao, produced the Chinese translations of the concerned EU legal opinions as reference for the local community. In 2014, a total of 14 EU working

group documents were translated:

1. *Working document on determining the international application of EU data protection law to personal data processing on the Internet by non-EU based web sites;*
2. *Opinion 4/2004 on the Processing of Personal Data by means of Video Surveillance;*
3. *Working Document on Genetic Data;*
4. *Opinion 3/2009 on the Draft Commission Decision on standard contractual clauses for the transfer of personal data to processors established in third countries, under Directive 95/46/EC (data controller to data processor);*
5. *FAQs in order to address some issues raised by the entry into force of the EU Commission Decision 2010/87/EU of 5 February 2010 on standard contractual clauses for the transfer of personal data to processors established in third countries under Directive 95/46/EC;*
6. *Opinion 4/2010 on the European code of conduct of FEDMA for the use of personal data in direct marketing;*
7. *Opinion 13/2011 on Geo-location services on smart mobile devices;*
8. *Opinion 02/2012 on facial recognition in online and mobile services;*
9. *Opinion 04/2012 on Cookie Consent Exemption;*
10. *Opinion 02/2013 on apps on smart devices;*
11. *Working Document 02/2013 providing guidance on obtaining consent for cookies;*
12. *Opinion 03/2013 on purpose limitation;*
13. *Opinion 06/2013 on open data and public sector information ('PSI') reuse;*
14. *Working document 01/2014 on Draft Ad hoc contractual clauses "EU data processor to non-EU sub-processor".*

Cooperation and Publicity

I. International and regional connection

With the growing number of countries and regions established their own personal data protection laws and enforcement authorities, the international community is sharpening its focus on the importance of privacy protection. In particular under the context of rapid technological advance, numerous countries and regions have already geared up themselves to meet the respective challenges.

To keep up with the digital trends and to follow close behind the development of personal data protection, in 2014 the GPDP attended various international conferences and activities, actively seeking exchanges with various law enforcement authorities of different countries and regions, in order to embrace with the new ideas for better privacy protection of the Macao community.

Moreover, the GPDP, in 2014, as usual, joined the Privacy Week, the annual initiative of the Asia Pacific Privacy Authorities (APPA), and the International Internet Privacy Sweep, organized by Global Privacy Enforcement Network. The activities this year aimed at examining the risks posed by mobile apps. At the same time, the GPDP also invited a number of overseas privacy enforcement authorities to visit Macao, in a bid to allow sharing of experience for the furtherance of local data protection.

1. Privacy Week 2014

Members of the APPA each year participate in its annual educative initiative, the Privacy Week, in order to promote privacy protection and generate more public awareness of privacy and personal data protection. In 2014, the Privacy Week focused on promoting the use of mobile apps and privacy protection. The GPDP during this year's Privacy Week, organized a number of specialized activities, including the Seminar on the Protection of Personal Data and Data Security for Mobile Apps; the Seminar on the Protection of Personal Data for Mobile Apps; Talks on the Personal Data Protection Act; Privacy Awareness Week 2014 – Seminar on Mobile Apps and Personal Data Protection; and the Chinese Slogan Competition for Personal Data Protection for Students.

2. The Asia Pacific Privacy Authorities Forums

To fulfill its obligations as a member of the Asia Pacific Privacy Authorities, in

June and December, the GPDP sent representatives to attend the 41st and the 42nd Asia Pacific Privacy Authorities Forum. During the events, participating countries and regions reported their latest works and discussed the possibilities of strengthening further mutual cooperation.

The GPDP also participated in the Communications Working Group and the Technology Working Group of the APPA Forum.

3. The Global Privacy Enforcement Network (GPEN)

The GPDP continues participating in the Global Privacy Enforcement Network as member and in May conducted the Second Privacy Sweep, along with other 25 privacy enforcement authorities around the globe. In this joint initiative, the risks arose from mobile apps were examined. The GPDP is also a coordinating member of the Asia Pacific Teleconference of GPEN, and joins the monthly teleconference of the organization.

4. The International Conference of Data Protection and Privacy Commissioners

In the mid of October the GPDP attended, as observer, the 36th International Conference of Data Protection and Privacy Commissioners in the Republic of Mauritius. The Mauritius Declaration on the Internet of Things and a number of resolutions, were approved during this event. A clear cooperation framework was established in this meeting, which will benefit the privacy commissioners around the globe to enhance closer cooperation for upcoming new challenges.

The GPDP also joined the Working Group for Digital Education organized by the ICDPPC.

5. APEC Electronic Commerce Steering Group (ECSG)

The GPDP attended the APEC Electronic Commerce Steering Group (ECSG), Beijing, as guest, during August of 2014. This meeting intended to strengthen the collaborations of personal data protection between the member economies of the organization.

6. Representatives from the National Commission for Data Protection visited the GPDP

The PDPA of Macau and the respective laws of Portugal have close legal origins with each other. Gaining deeper understandings of the law enforcement experience and the latest development of personal data protection in Portugal can better promote local public awareness towards protecting data; in return, this help converge Macao's standard of the respective works with the international standard. To this, the GPDP invited the representatives from the National Commission for Data Protection to organize a number of specialized seminars for different public departments, the health and medical professionals and the staff of the GPDP. In these seminars the attendants and speakers exchanged their views and the latter also shared their valuable experience in order to enhance more in-depth legal knowledge for the seminar participants.

II. Community relations

Exchange of thoughts with the local community and the respective sectors helps strengthening the personal data protection regime. To this, the GPDP seeks active dialogues with the general public. In August, a meeting was held with the representatives from the Macao Catholic Schools Association, in order to interact more with the education sector with regard to their processing of personal data and in a bid to exchange opinions on formulating the *General Notes on Handling Personal Data by Non-Tertiary Education Institutions*.

III. Publicity and promotions

Since its establishment, the GPDP has been actively promoting the PDPA to the public through different activities. To evaluate the publicity results and to aggregate greater public attentiveness to privacy protection, the GPDP, to review its personal data protection initiatives, commissioned the Education Research Center (ERC) of the University of Macau to carry out the Research on the Level of Awareness and Needs of Personal Data Protection amongst Secondary and University Students 2014. This research aimed at understanding the level of awareness, attitudes, and needs of high school students, university students, and teachers in personal data protection. The research results help promote data protection and also provide references to future publicity and educational initiatives.

To implement the MSAR Government's policy in relation to personal data protection – to emphasize personal data protection and network security for enhancing further security awareness – the GPDP's publicity activities, in 2014, mainly centered on information security. For this, the GPDP organized the Chinese Slogan Competition for Personal Data Protection for Students, in order to enhance greater awareness of information security and personal data protection amongst students, as a way to safeguard the rights of others and their own. The Competition was supported by school principals, teaching staff and parents and attracted wide participation. Winning slogans were then reproduced on the calendar for the year 2015 and distributed to private and public institutions to promote the PDPA.

On the other hand, the GPDP also continues exerting effort on publicity by arranging lectures, topical seminars, trainings, etc. The activities, aside from promoting personal data protection, also intended to directly exchange views with the participants, allowing them to provide respective opinions on personal data protection and other respective topics.

Presentation sessions, Seminars and Trainings

| Activities | No. | No. of attendants |
|--------------------------------------|-----|-------------------|
| 1. Presentation sessions on the PDPA | 57 | 2,932 |
| 2. Conference and seminars | 29 | 4,000 |
| 3. Trainings | 74 | 2,173 |
| Total: | 160 | 9,105 |

(I) Presentation sessions

Presentation sessions of the PDPA have been one of the main publicity activities of the GPDP. During 2014, the GPDP engaged with 20 private and public entities for 57 presentation sessions. Altogether there were 2932 participants attended. Aside from the introduction of the PDPA, the GPDP, during the activities, also explained the legal regime governing the personal data protection of Macao, in a bid to promote lawful processing and protection of personal data.

Moreover, the GPDP, for IT security relating to personal data protection, organized a number of presentation sessions in 2014, namely in the themes of The Rights of the Data Subjects, and the Security and Confidentiality of Personal Data Processing. These sessions intended to exchange views and experience with the attendees about the problems they might encounter during daily personal data processing.

Presentation sessions on the PDPA

| Year | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 |
|---------------------|-------|-------|-------|-------|-------|-------|-------|
| No. of participants | 1,339 | 1,169 | 1,041 | 1,561 | 1,960 | 4,458 | 2,932 |
| No. of sessions | 22 | 23 | 23 | 25 | 30 | 50 | 57 |

(II) Conferences and seminars

1. Seminar on E-Government and Data Security

To strengthen public departments' data security awareness, the GPDP, on April 2nd, organized the Seminar on E-Government and Information Security. The seminar speakers included Dr. Maria Filipa Pires Urbano da Costa Calvão, President of the National Commission for Data Protection (CNPDP/*Comissão Nacional de Protecção de Dados*) and Mr. Justice Carlos Alberto Gameiro de Campos Lobo of Portugal. During the seminar the speakers shared their experience of Portugal's personal data protection, served as valuable reference for the local data protection work.

2. Seminar on Electronic Health Record System and Personal Data Protection – Portugal's Experience

Collaborated with the Center for the Civil Servant Trainings (*Centro de Formação de Trabalhadores do Serviço Público*), the GPDP, on April 3rd, organized the Seminar on Electronic Health Record System and Personal Data Protection – Portugal's Experience. Speaker of the Seminar, Ms. Isabel Cristina Cerqueira de Cruz, Secretariat of the CNPDP, shared Portugal's experience in managing the health record system and its data protection. More than 100 local medical professionals attended the seminar and conducted in-depth exploration on the topics with the speakers.

3. Seminars organized for Privacy Week 2014

For Privacy Week 2014, between May 4th and 10th, the GPDP organized a series of specialized seminars to raise public awareness in App security for personal data protection and privacy safeguards. These seminars include:

- On May 5th the GPDP organized the Seminar on the Protection of Personal Data and Data Security for Mobile Apps. During the seminar the launching ceremony of Privacy Week 2014 also took place.
- Mainly targeting university students, the GPDP, on May 7th, co-organized the Seminar on the Protection of Personal Data for Mobile Apps with the Faculty of Law, the University of Macau.
- On May 8th the GPDP organized the Seminar on Mobile Apps and Personal

Data Protection, seminar of the Privacy Awareness Week 2014. This seminar focused on apps security and privacy protection, and mainly targeted the management staff of institutions and commercial enterprises, as well as IT personnel.

4. Seminar on the Use of Public Registry Information

The titled seminar designed to allow the designated officers of public departments to gain insights into the use of public registration database information. On May 26th the GPDP held the Use of Public Registration Database Seminar. Speakers included Brenda Kwok, Chief Legal Counsel of the PCPD (Office of the Privacy Commissioner for Personal Data), Hong Kong, and Yang Chongwei, Deputy Coordinator of the GPDP. Themes of the Seminar centered around Personal Data Protection and Reuse of Public Department Information, Use of Personal Data Collected from Public Domain, and others. During the event the speakers shared their expertise with the attendees and answered their questions.

5. Seminar on the PDPA and Information Security Management

The GPDP and the Macao Productivity and Technology Transfer Centre, during June and August, organized two seminars to promote the PDPA, and the respective security measures and international standard of information security in particular.

6. Seminar on Cross-Border Data Transfer and Data Security

To prevent legal violations caused by incautious cross-border transfer of data, the GPDP in July organized the Seminar on Cross-Border Data Transfer and Data Security. This seminar invited Gehan Gunasekara, Associate Professor of Auckland University, New Zealand; Félix Torres, Vice President of the Computer Chambers of Macau; and other local experts to share their views on the topics related to cross-border data transfer and respective developments. This enhanced exchanges and experience sharing, from different perspectives, between the local private and public sectors.

7. Lecture on the Protection of Personal Data

As invited by the Hou Kong Middle School and the *União Geral das Associações dos Moradores de Macau* (General Union of Macau Residents), the GPDP, during September and November, organized the Lecture on the Protection of Personal Data for these entities. These two sessions aimed at the furtherance of personal data

protection for students, teachers and organization contact officers.

8. Seminar on the Guidelines for Apps Development

The GPDP and the Macau Productivity and Technology Transfer Centre, in October, organized four sessions of the Seminar on the Guidelines for Apps Development. In each session apps developers and operators were explained with the guidelines content, gaining insights on issues relating to personal data protection encountered during apps development, in addition to having a deeper understanding on their rights and obligations to avoid legal violations.

9. Seminar on the processing of personal data by vehicle positioning devices

For the Simplified Notification for the Personal Data Processed by Vehicle Positioning Systems and Devices, Authorization No. 01/2014, the GPDP issued, we organized a number of seminars during November, aiming to explain the respective content and application procedures to the general community, as well as the public and private entities.

10. Seminar on Data Security and Trends in Credit Card Crime

On October 27th the GPDP, collaborated with the Judiciary Police, organized the Seminar on Data Security and Trends in Credit Card Crime. Targeting credit card security and the related crime, during the Seminar speakers and attendees had extensive case discussions, in addition to exchanges of experience aimed at better customer data protection.

11. Macao IGF (Internet Governance Forum) 2014 – Information Security of Apps and Online Privacy

To reinforce the community's knowledge on information security, the GPDP, during November, organized the Macao IGF 2014 in the Macao Science Center. The Forum was organized with the Macao Polytechnic Institute, Macau Productivity and Technology Transfer Center, and the Macau Network Information Centre.

(III) Trainings

1. Lecture on Personal Data Protection Act and the Management of Personnel Information; Lecture on Personal Data Protection Act and the Management of Customer Information; and the PDPA Lecture

The GPDP continued to co-organize with the Macau Productivity and Technology Transfer Center the Lecture on Personal Data Protection Act and the Management of Personnel Information. During the lecture, in addition to explaining the PDPA, the speakers also elaborated on the common problems commonly found in the management of personnel information and the respective personal data processing, and the practical issues to be noticed. In addition, the GPDP also organized two training sessions, the Lecture on Personal Data Protection Act and the Management of Customer Information, and the Intermediate Personal Data Protection Act Lecture. These trainings targeted the staffers who specialized in processing customers' personal data and in personal data protection. These trainings were respectively organized in May, June, September and December, and a total of 158 persons attended.

In addition, during December the GPDP, for the first time, organized the Lecture on the PDPA and the Management of Personnel Information Management with the Macao Federation of Trade Unions. The training aimed at enforcing the practicalities of personal data protection in employment context, and 23 persons attended the event.

2. Trainings for promotions (*formação para efeitos de acess*) – requisite trainings (*as acções de formação em regime de aproveitamento*)

As invited by SAFP (*Direcção dos Serviços de Administração e Função Público*), the GPDP, from March to October, included a lecture named Introduction to the PDPA in the requisite trainings for promotions of civil servants. The lecture focused to strengthening civil servants' knowledge on personal data protection. A total of 840 civil servants attended the lecture.

3. Police officer trainings 2014

As invited by the PSP, the GPDP, between May and July, sent legal officers to give PDPA lectures for the titled trainings. The lecture aimed at introducing the PDPA content for enhancing police officers' knowledge on the respective laws and provisions; in sum 720 police officers attended this lecture.

4. Complimentary Trainings for Licensed Real Estate Agent

In May, August, and November, the GPDP, as invited by the DSAL, provided a training session of the PDPA for the titled trainings. The session intended to deepen the understanding of the PDPA and proper processing of customers' personal data. A total of 89 agents attended this session.

5. The Concept of Personal Data Protection – training course of Macao Polytechnic Institute

In May the GPDP, as invited by the Macao Polytechnic Institute, organized the titled training course. The training course, with a total of 32 students, provided insights on the concepts on personal data protection and attempted to raise data protection awareness.

6. The Concept of Personal Data Protection, and the Lecture on Personal Data Protection Act for IACM

For the staff of IACM, the GPDP sent representatives to give a training session named the Concept of Personal Data Protection, which intended to strengthen the awareness of personal data protection, as part of the requisite trainings of civil servant promotion. Totally there were 156 attendees participated in the trainings.

Moreover, during September the GPDP gave lectures on the PDPA to 60 officers of IACM in a bid to strengthen the knowledge on their daily routine relating to personal data processing.

7. Lecture on PDPA for the Macao Prison

As invited by the Macao Prison, the GPDP in October organized five sessions named the Lecture on PDPA. A total number of 86 participants attended these trainings. In addition to explaining the PDPA content, the Lecture also focused on the practical daily issues relating to personal data processing. Wide exchanges of experience were fostered during the trainings.

(IV) Media contacts

To enhance transparency, facilitate timely communications with the general public and strengthen media contacts, the GPDP established media contacts through press release, interviews, etc. On October 6th, Deputy Coordinator Yang Chongwei, invited by the Lotus TV, attended the current affairs programme *Call In Macau* and discussed issues relating to personal data protection.

On the other hand, the GPDP will continue organizing annual press conference to announce the cases in which penalties were imposed, as a reminder to the community to properly process personal data. On February 26th, the GPDP announced five cases of 2013 and the respective investigations results. On August 24th, the GPDP organized another press conference with the PSP and the PJ, as an attempt to explain to the public that the unofficial poll of universal suffrage could be a legal violation due to the improper personal data processing.

V) Publicity through media

1. Privacy and you

Privacy and You is a Q&A column the GPDP continuously published in the local Chinese, Portuguese and English newspapers. This column intends to provide to the general public the knowledge of, based on real cases or situations, personal data protection in an interesting way.

2. Promotional video and audio clips

To accommodate the GPDP's publicity, in 2014 we produced a video clip and an audio clip to promote information security. These clips were broadcasted on four local TV channels at different time period, in order to raise public awareness of information security and promote respect of privacy.

VI) Various forms of publicity

Chinese Slogan Competition on Personal Data Protection for Student

To promote the awareness of information security amongst secondary and primary students, in particular when they are using IT gadgets and Internet and to deflect compromising others' personal data, the GPDP organized the titled competition.

A total of 1196 slogans received from the competition, respectively from two contestant groups, namely the primary-student and secondary-student group. Renowned writer Li Guan-ding, Deputy Coordinator Yang Chongwei and Office Chief Jacky Lio were the jury members. During the award ceremony, the winners also shared their perspectives on personal data protection.

VII) Publications and publicity materials

1. The GPDP Newsletter (seasonal journal)

Each season the GPDP covers an array of articles for promoting personal data protection in its publication, the GPDP Newsletter, available in printed and electronic versions. Since 2014, the Newsletter has revolutionized its design, offering comprehensive topics and extending to readers wide-ranging coverage on data protection issues, in order to promote to the general public of importance of data protection.

2. Annual Report 2013

The Annual Report 2013 summarizes the legal works of the GPDP during 2013, in addition to covering the publicity and legal works it carried out. According to Article 25(5) of the PDPA, the Annual Report also published the opinions and authorizations issued during the year.

3. Publicity items

The GPDP continued to produce different kinds of publicity materials to remind the citizens the importance of personal data protection.

(V) Website

The GPDP in 2014 re-designed its website, in addition to launching its mobile webpage, which provides instant access to GPDP's updates. In 2014 there was a total record of 180,000 visitors to GPDP's website.