



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. 01/A/2012/GPDP**

**Subject: Reception of information on vehicles and drivers involved in traffic violation by the DSAT from the Public Security Police (PSP) through combination**

The Transport Bureau (DSAT) and the Public Security Police (PSP) apply to the GPDP for an authorization to combine the personal data of vehicles and drivers involved in traffic violations.

As shown in the information provided by the DSAT and the PSP, the types of information subject to combination shall be that of vehicles and drivers involved in traffic violations, including vehicle model, license plate number, locking status (1. locked, 2. unlocked), the date when the locking status was last changed, as well as the identification information of the drivers (type and number of the identity document).

According to Article 4(1)(10) of the Law 8/2005 (the Personal Data Protection Act), the information to be provided by the PSP to the DSAT through combination is related to identified or identifiable natural persons and thus it is regarded as personal data. Therefore, according to Article 3(1) idem, the processing of information involved shall be subject to the PDPA.

Given in the information provided by the DSAT and the PSP, in order to obtain the information on vehicles and drivers involved in traffic violations, the database of DSAT will be kept in automatic, real time synchronization with the PSP through a leased line and by softwares (the Public Security Forces Affairs Bureau, or the DSFSM, will provide technical support for the data transmission and data reception by the PSP). Therefore, through the aforesaid connection, connection is established between the databases of the DSAT and the PSP, which shall be deemed as the combination of personal data as defined in Paragraph 1(10), Article 4, of the PDPA.

According to the information given by the DSAT and the PSP, the purposes of information combination of vehicles and drivers involved in traffic violations are aimed the statutory duties discharged by the DSAT and its update of the vehicle and driver information.

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 processing of personal data or the entities undertaking the joint processing shall



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apply to the GPDP for a combination authorization.

After analyzing the information as provided by the DSAT and the PSP, the GPDP finds that the PSP provides information on vehicles and drivers involved in traffic violations to the DSAT, through combination, is to allow the DSAT to update its information in a timely manner, and to reduce the time and cost of the administrative procedures, which is in accordance with the efficiency principle of administrative procedures. In addition, it is also in line with the e-government policy of the MSAR Government. Furthermore, after considering the types of information for combination, whether the combination meets the purposes specified in laws and regulations and the legitimate interests of the data controller and the fact that the combination shall not discriminate or reduce the rights, freedoms and protections of the data subjects, the application conforms to Article 9, Paragraph 2, of the PDPA.

To sum up, the PSP provides information on vehicles and drivers involved in traffic violations to the DSAT through combination, so that the latter can perform its statutory duties and update the files of vehicles and drivers. According to Articles 9 and Article 22 Paragraph 1(3) of the PDPA, the GPDP hereby authorizes the DSAT and the PSP to process the aforementioned personal data through combination for the said purposes, on the conditions that the secure processing shall not reduce the rights of the data subjects.

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