



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. 02/A/2012/GPDP

Subject: The Transport Bureau applied for data combination to provide the Public Security Police the registration information of motor vehicles and drivers

The Transport Bureau (DSAT) applies to the GPDP for an authorization on the combination of personal data with the Public Security Police Force (PSP) for the processing of information on the registrations of motor vehicles and drivers.

According to the information given by the DSAT and the PSP, the category of information subject to the combination shall include name, sex, date of birth, age, address, phone number and photo of the motor vehicle owner and driver; motor vehicle registration number; identity document number; chassis number; motor number; motor vehicle model and specification; motor vehicle purpose(s); related dates of the motor vehicle and driver materials; taxi driver permit number; driving school headmaster qualification ID; driving instructor qualification ID; physical disability information; motor vehicle validation result; driving qualification; marital status and driving license number.

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

According to the information from the DSAT, when providing the concerned information to the PSP, the DSAT will perform real-time data transmission through a leased line and software (the Public Security Forces Affairs Bureau will provide technical support for the data transmission and reception by the PSP). Therefore, through the said connection, a 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 Article 4(1)(10) of the PDPA.

According to the DSAT, the information combination for the registrations of motor vehicles and drivers is for the PSP to obtain the latest information for discharging its statutory duties.

According to Articles 22 and 9 of the PDPA, unless combination of personal data has been specified in the laws or organizational regulations, the data controller of the data



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processing, or the entity responsible for the joint processing, shall apply to the GPDP for authorization.

After analyzing the materials provided by the DSAT and the PSP, the GPDP finds that the DSAT provides information of the registrations of motor vehicles and drivers to the PSP through combination, so that the PSP can obtain the 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 Macau SAR Government. In addition, the type of information for combination, whether the combination meets the purposes specified in laws and regulations and the legitimate interests of the data controller for the processing of personal data and the fact that the combination should not discriminate or reduce of the rights, freedoms and safeguards of the data subjects, all conform to Article 9(2) of the PDPA.

To sum up, the DSAT provides information on registration of motor vehicles and drivers to the PSP through combination, so that the latter can exercise its statutory duties. According to Articles 9 and 22(1)(3) of the PDPA, the GPDP hereby authorize the DSAT and the PSP to process the previously mentioned personal data through combination based on the said purposes, by guaranteeing the safe processing of the data and without reducing the rights of the data subjects.

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Coordinator
19 March 2012