



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. 11/A/2012/GPDP**

**Subject: The Financial Services Bureau applied for data combination with the Macao Economic Services to provide the information of business taxpayers**

The Financial Services Bureau (DSF) and Macao Economic Services (DSE) apply to the GPDP for an authorization on the combination of personal data of business tax payers.

As given in the information provided by the DSF and the DSE, the personal data subject to combination comprises the reference codes of the business tax payers; names, types and numbers of the ID documents of the business tax payers; names, addresses, telephone numbers and the dates the business were incorporated and closed down; records showing whether the business tax payers or business were found with overdue tax payments; and other business registration information.

According to Article 4(1)(1) of Law 8/2005 (the Personal Data Protection Act, also known as the PDPA), “personal data shall mean any information of any type relating to an identified or identifiable natural person.....” When a business tax payer is a natural person, information as mentioned relates to an identified or identifiable natural person and thus is considered 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 provisions in 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 the DSF and DSE, the DSF provides information on business tax payers to DSE through a leased line. Through connection as such, DSE will have its database updated with the latest information supplied by the DSF, so that a data connection is established between the databases of these two entities, which meets the definition of combination as provided in the PDPA.

As shown in given information, the purpose of the data combination on business tax payers is for DSE to handle the approval procedures that are within the scope of its legal competence.

According to Articles 9 and 22 of the PDPA, unless the combination of personal data has been specified in laws or organizational regulations, the entity responsible for the processing of personal data or the entities undertaking the joint responsibility must apply to



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the GPDP for an authorization.

After analyzing the information given, the GPDP finds that the DSF, through combination, provides information on business tax payers to DSE, so that the latter can update the information necessary for the performance of its legal competence, as well as reducing the time and cost of the administrative procedures, which is in accordance with the efficiency principle of administrative procedures and meets the e-government policy of the MSAR government. 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 lead to discrimination against or reduction of the rights, freedoms and protections of the data subjects, these all meet Article 9(2) of the PDPA.

To sum up, the DSF provides information on business tax payers to DSE, so that the latter can handle the approval procedures as part of its legal competence, to this, the GPDP, under Articles 9 and Article 22(1)(3) of the PDPA, hereby authorizes these two public authorities to process the related personal data through combination for the above-mentioned purposes, on the condition of guaranteeing the safe processing of such data and without reducing the rights of the data subjects.

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Coordinator  
15 August 2012