



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

UNOFFICIAL TRANSLATION

**Authorization**

**No. 18/A/2012/GPDP**

**Subject: Inquiry made by the Trade and Investment Promotion Institute through combination on the information kept by Macao Economic Services on registration of industrial licenses**

The Macao Economic Services (DSE) applies to the GPDP for an authorization on the combination of personal data with the Trade and Investment Promotion Institute (IPIM) to access the DSE's information on the registrations of industrial licenses.

According to the materials provided by the DSE, the personal data subject to combination shall include the names of the industrial premises owners; reference codes of the premises; and the names, addresses, telephone numbers, fax numbers and the conditions of the premises.

According to Article 4(1)(1) of Law 8/2005 (Personal Data Protection Act, or the PDPA), when the owner of a premise is a natural person, his name, address, telephone number and fax number, etc., are considered as the data of an identified or identifiable natural person and also as personal data. According to Article 3(1) of the same Law, the processing of such information shall be subject to the PDPA.

According to 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". As shown in the related materials, the IPIM accesses, prints or saves the DSE's information on the registrations of industrial licenses through the Internet. In such a way, a data connection is established between their databases, complying with the definition of combination as provided in the said Law.

According to the DSE, its purpose to provide the related information to the IPIM is to assist the latter in performing its administrative work and effectively providing information on the local manufacturers or exporters to foreign buyers.

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



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After analyzing the above materials, the GPDP finds that the DSE allows the IPIM to access the registration information of industrial licenses through combination, so that the IPIM can obtain 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 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 discriminate or reduce the rights, freedoms and protections of the data subjects, these all meet Article 9(2) of the PDPA.

To sum up, the DSE allows the IPIM to access the registration information of industrial licenses through combination, so as to perform its statutory duties. According to Articles 9 and 22 (1)(3) of the PDPA, the GPDP hereby authorizes the DSE and the IPIM to process the related personal data through combination for the said purpose, by guaranteeing the safe processing of such data and without reducing the rights of the data subjects.

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Coordinator  
23 August 2012