旅遊規則中的資料保護

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將客戶的姓名、地址及身份證明文件號碼傳送給外國機構，屬於跨境轉移個人資料。在新加坡，《2012年個人資料保護法》（PDPA）的轉移限制責任要求轉出資料的機構確保接收方受具法律約束力的義務規限，須以與PDPA相若的標準保護該等資料，除非有豁免情況適用。[1] 法律規定的轉移可獲豁免，因此在PSN02有所規定時，傳送本身受豁免涵蓋。然而，選用不安全的渠道，或將資料傳送給無法保護資料的交易對手，則不在豁免之列。公司應確保其旅遊規則網絡的條款對所有參與者施加資料保護義務，並應記錄有關評估。在瑞士方面，2023年的《瑞士聯邦資料保護法》（DSG/FADP）訂有相若的要求，詳見第D部分第X章。

註釋

1. Personal Data Protection Act 2012，第26條（將個人資料轉移至新加坡境外）及Personal Data Protection Regulations 2021，第10條（轉移的條件）。 ↩

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