**Special Nature Processing**

**Permission Request Form**

**PDPPL-02040402E**

|  |  |
| --- | --- |
| National Data Privacy Office | |
|  |  |

**Version: 3.0**

**First Published: November 2020**

**Last Updated: April 2025**

**Classification: Public**

**Document History**

|  |  |  |
| --- | --- | --- |
| **Version Number** | **Description** | **Date** |
| **1.0** | First publication of the document V1.0. | November 2020 |
| **2.0** | Second publication of the document V2.0. | September 2022 |
| **3.0** | Third publication of the document V3.0. | April 2025 |

**Related Documents**

|  |  |
| --- | --- |
| **Document Reference** | **Document Title** |
| **PDPPL-02050215E** | Guidelines for Special Nature Processing |

*This form will need to be filled out when requesting permission from the National Data Privacy Office* **(Hereinafter referred to as “the Office”)** *for processing personal data of a special nature. Prior to completing this form, you should go through the Office Guidelines for Special Nature Processing to ascertain the adequacy of data protection measures around the special nature processing.*

Answer the following questions and attach the appropriate evidence to this application.

|  |  |
| --- | --- |
| **Details of the controller** | |
| Provide details of your organisation here. | |
| Name of organisation |  |
| CR/License number |  |
| Industry |  |
| Name of person in charge of data privacy |  |
| Website URL |  |
| Contact details |  |
| You may add here a brief description of your organisation, or link to relevant pages on your website. | |

|  |  |
| --- | --- |
| **Details of processing activity that involves personal data with special nature** | |
| Describe the processing activities that involve personal data with special nature in this section, in as much detail as possible. Attach to this application, a sample filled DPIA Template that you have conducted for one of these processing activities. | |
| Describe the purpose for processing personal data with a special nature | The reason the processing is being undertaken is... |
| What category (or categories) of personal data of a special nature that will be collected and processed? | The personal data of a special nature to be processed are personal data related to… [ethnic origin / children / health, physical or psychological condition / religious creeds / marital relations / criminal offences / biometrics]. |
| Identify the permitted reason for each of the processing activities that involve personal data with a special nature and set out the rationale | The permitted reason for processing has been identified as… [Consent / Legal Obligation / Contractual Purpose / Legitimate Interest]. This is appropriate because... |
| For each of the processing activities listed above, identify the additional condition for processing and set out the rationale | The additional condition for processing has been identified as… [Explicit consent / Parental Consent / Made public by the data subject / Employment / Social security / Vital interests / Legal claims / Preventive or occupational medicine / Charity or not-for-profit administration / Public health / Public interest / Protecting national and public security]. This is appropriate because... |
| What is the status of the various processing activities that involve personal data with special nature - are they already implemented or in development? | Already Implemented / In Development  E.g. Processing health records for insurance purpose – Implemented  Processing children’s data for the purpose of school fees reimbursement – In development |
| For each of the processing activities that involve personal data with a special nature, provide details of if there is cross border transfer of data and associated measures to manage risks arising from such transfers. | Following are the special nature processing activities that involve cross border data transfers:   * Processing Activity 1: Transfer to EU; Safeguards in place: Risk Assessment conducted on such transfers and executed a Data Transfer Agreement binding the data importing entity in the EU to process data in accordance with the requirements of PDPPL |
| For each of the special nature processing activities, set out why the processing of the categories of personal data of a special nature is strictly necessary and proportionate for achieving the purpose for processing. | It is necessary to process the personal data of a special nature to achieve [purpose for processing] because...  The purpose for processing could not be achieved without using this personal data because... |
| Kindly confirm that each of the special nature processing activities have been subject to a DPIA and any identified risks are managed appropriately | Yes / No |
| Kindly confirm that the details of each of the processing activities are recorded in a Records of Processing Activity Template | Yes / No |
| Kindly confirm that a sample DPIA is attached/included in the correspondence to Office that includes this form | Yes / No |

|  |
| --- |
| **Describe data privacy protection measures** |
| Kindly confirm the existence and a brief description of your organization’s Data Privacy Protection measures:   * Personal Data Management System. * Data breach response process. * Privacy training and awareness measures. * Data privacy related policies and procedures. * Cross Border Data Transfer Risk Management. * Privacy Risk Management System. * Data Retention and Disposal measures. * Security measures to safeguard personal data. * Individual Rights Management. |

|  |  |
| --- | --- |
| **Declaration and Sign-off** | |
| **・ I, \_\_\_\_\_\_\_\_\_(Name of the legal representative or authorized person) \_\_\_\_\_\_\_\_\_, hereby declare that I am the legal representative of the controller and/or legally authorized to submit this application on behalf of \_\_\_\_\_\_\_\_\_\_ (Name of the Organization).**  **• We, \_\_\_\_\_\_\_\_\_\_ (Name of the Organization), hereby acknowledge the following:**   1. All data, documents, and evidence attached (if any) to this application are accurate and reflect the truth. If proven otherwise, 2. The Office has the right to take necessary actions in accordance with applicable laws, regulations, rules, and policies.   **• We, \_\_\_\_\_\_\_\_\_\_ (Name of the Organization), hereby undertake the following:**   1. To conduct a Data Protection Impact Assessment (DPIA) for any activity involving the processing of future personal data of a special nature, in order to identify and manage potential risks, and to document the processing activity in accordance with the model approved by the administration.   To notify the Office in the event that any future data processing activities are likely to result in high risks to individuals’ privacy and personal data. | |
| the Legal Representative of the Organization / the Authorized person |  |

**End of Document**