

Legislative Council Panel on Constitutional Affairs

Report on the Work

of the Office of the Privacy Commissioner for Personal Data, Hong Kong
in 2024

This paper serves to brief Members on the work of the Office of the Privacy Commissioner for Personal Data (PCPD) in 2024 and its work plan in 2025.

(I) Overview

2. The Personal Data (Privacy) (Amendment) Ordinance 2021 (Amendment Ordinance) came into effect on 8 October 2021 to strengthen the combat of doxxing acts that are intrusive to personal data privacy, empower the Privacy Commissioner to issue cessation notices to remove online doxxing messages and carry out criminal investigations and institute prosecutions. Since the enactment of the Amendment Ordinance, the PCPD has been taking continuous resolute enforcement, and the doxxing problem has demonstrably been under control. There has been a continuous downward trend in both the number of doxxing-related complaints and doxxing messages proactively uncovered by PCPD's online patrols.

3. In addition, the development of internet technology has also posed challenges for personal data protection. Over the past few years, the number of data breach notifications received by the PCPD and the number of data breach incidents identified through compliance checks have remained relatively stable, with over a hundred cases each year. However, this number increased in 2024. In response to the rise in data breach incidents, the PCPD is implementing a range of initiatives. On one hand, it is updating relevant guidelines and actively enhancing public awareness and education, while also strengthening enforcement efforts, and

examining amendments to the Personal Data (Privacy) Ordinance (Ordinance) to address the issue.

4. To assist organisations in proactively preventing data breach incidents, the PCPD has strengthened its promotion and education on data security, including launching the “Data Security” thematic webpage, hotline and the “Data Security Scanner” for organisations to self-assess their data security measures. The PCPD also launched the “Data Security” Package for schools, NGOs and Small-and-Medium Enterprises (SMEs) to further enhance their data security, with participating organisations receiving free training quotas upon completion of an assessment by the “Data Security Scanner”. Meanwhile, the PCPD actively organised seminars, conducted in-house trainings for different organisations and collaborated with organisations such as the Hong Kong Police Force, the Digital Policy Office, the Hong Kong Monetary Authority, etc., to organise events to promote data security. In addition, the PCPD launched the flagship event “Privacy Awareness Week” with the theme of data security, released a series of promotional videos and introduced the data security mascot, as well as raising awareness of data security among organisations and members of the public through published guidelines and media publicity.

5. The Government of the Hong Kong SAR has been strengthening the development of new quality productive forces and enhancing technological empowerment to achieve high-quality development of the real and digital economy and to build Hong Kong into an international innovation and technology (I&T) centre. The PCPD has been actively dovetailing the direction of promoting the digital economy, with Artificial Intelligence (AI) being one of the drivers of digital economy development. In 2024, the PCPD published the “Artificial Intelligence: Model Personal Data Protection Framework” (Model Framework), which provides recommendations regarding the protection of personal data privacy in AI governance. The PCPD also promoted AI governance and security to public and

private organisations in Hong Kong through, among others, publishing articles, organising seminars and engaging with stakeholders.

(II) Implementation of the Ordinance

Handling of Complaints

6. In 2024, the PCPD received 3 431 complaints¹, representing a decrease of 4.2% when compared to 3 582 cases in 2023. Of these 3 431 complaint cases, 44% of the complaints were lodged against the private sector (1 514 cases), 10% against the public sector/government departments (330 cases) and 46% against individuals (1 587 cases). Regarding the complaints against the private sector, the highest number of complaints (299 cases) were received in respect of the financial and monetary sector. These complaints involved not only complaints against banks, but also complaints against financial institutions and money lending companies (186 cases), and the complaints mainly concerned the improper collection and use of personal data of their customers. The property management sector (224 cases) was the sector that attracted the second highest number of complaints, most of which were about excessive collection of personal data for visitor registration and posting of notices containing residents' personal data at lobbies or other areas.

Investigation Findings on the Operation of the Worldcoin Project in Hong Kong Contravenes the Ordinance

7. The matter arose from the PCPD's concern that the operation of Worldcoin project in Hong Kong involved serious risks to personal data privacy. As such, the PCPD proactively commenced an investigation in January 2024. The investigation findings revealed that participants of the Worldcoin project needed to allow the relevant organisation to collect their face and iris images through iris scanning to

¹ This complaint figure included 355 doxxing-related complaints and 87 doxxing cases uncovered by online patrols.

verify their identities and generate iris codes, thereby obtaining a registered identity (namely, World ID), after which the participants would be able to receive Worldcoin tokens, a cryptocurrency, at regular intervals for free.

8. After considering the circumstances of the case and the information obtained from the investigation, the Privacy Commissioner found that the operation of Worldcoin project in Hong Kong had contravened the Data Protection Principles (DPPs) 1(1), 1(2), 1(3), 2(2), 5 and 6 in Schedule 1 to the Ordinance relating to the collection, retention, transparency, data access and correction rights. The Privacy Commissioner has served an enforcement notice, directing all operations of the Worldcoin project to be ceased in Hong Kong in scanning and collecting face and iris images of members of the public using iris-scanning devices so as to protect their personal data privacy.

Complaints lodged by Hong Kong Diploma of Secondary Education Examination (HKDSE) candidates against the Hong Kong Examinations and Assessment Authority (HKEAA) about Excessive Fees Imposed for Accessing Marking Records and Examination Scripts

9. The investigations arose from four complaints received by the PCPD. The complaints were lodged by four candidates for the 2023 HKDSE, respectively, who complained against the HKEAA for imposing excessive fees for accessing marking records and examination scripts. The four complainants considered that in view of the change in the form of provision of requested data, the fee imposed for accessing the data should be reduced. However, the fee imposed by the HKEAA for the first data access application was reduced by only HK\$20 (from HK\$400 to HK\$380). Three of the complainants also observed that the fee for accessing the data of each additional subject remained unchanged (at HK\$104). The complainants thus lodged the complaints with the PCPD against the HKEAA for imposing excessive fees for accessing marking records and examination scripts (Complaint Matter I). One of the complainants considered that as HKEAA had already retained scanned copies of

the candidates' personal data, it should have been able to provide electronic copies of the data to the data access requestors. However, between 2012 and 2022, notwithstanding that the HKEAA was able to provide electronic copies of the requested data, it still chose to comply with data access requests by providing hard copies of the data at a higher cost and calculated the fees imposed on that basis. As such, the complainant complained against the HKEAA that the fee imposed by it for complying with a data access request was higher than the lowest fees the HKEAA imposed for complying with the request in another form (Complaint Matter II).

10. After investigation, the Privacy Commissioner found that for Complaint Matter I, the fees imposed by the HKEAA for complying with the data access requests were not excessive and the HKEAA had not contravened the relevant requirement of the Ordinance. For Complaint Matter II, as the HKEAA could only provide copies of the relevant data in one form (that is, in the form of hard copies) between 2012 and 2022, the requirement of the Ordinance was therefore not applicable. In other words, Complaint Matter II was not substantiated and the HKEAA had not contravened the relevant requirement of the Ordinance.

*Investigation Findings on Eight Organisations Placing “Blind” Recruitment Advertisements on JobsDB Hong Kong Limited to Unfairly Collect Job Applicants’ Personal Data*²

11. The investigation arose from the PCPD’s concern that the act of placing “blind” recruitment advertisements (Blind Ads) on online recruitment platforms by organisations to collect personal data from job applicants may constitute a contravention of the relevant requirements under the Ordinance. As such, the PCPD has initiated investigations against JobsDB Hong Kong Limited (JobsDB) and eight organisations that had placed Blind Ads on JobsDB.

² The Investigation Findings on placing “blind” recruitment advertisements are available at the following link: https://www.pcpd.org.hk/english/enforcement/commissioners_findings/files/r24_03031_e.pdf

12. The PCPD’s investigation revealed that organisations that have registered an account with JobsDB can place recruitment advertisements on JobsDB’s online platform. A recruiting organisation can publish recruitment advertisements in the name of a “Private Advertiser” without disclosing its name. The eight recruiting organisations under investigation published Blind Ads in the names of “Private Advertisers” to collect the job applicants’ personal data.

13. After considering the circumstances of the cases and the information obtained from the investigations, the Privacy Commissioner found that all of the eight organisations that placed the Blind Ads on JobsDB and requested job applicants to submit their personal data to unknown recruiting companies, and JobsDB that published the same on its platform, were involved in the unfair collection of the job applicants’ personal data, and this constituted contraventions of DPP 1(2) of the Ordinance. The Privacy Commissioner has therefore served enforcement notices on JobsDB and three recruiting organisations, directing them to take measures to remedy the contraventions and prevent recurrence of similar incidents in future, and issued an advisory letter to each of the remaining five organisations.

Combatting Doxxing Offences

14. Under the Amendment Ordinance, the PCPD is given new criminal investigation and prosecution powers to handle doxxing cases on a “one-stop” basis from criminal investigation to collection of evidence and prosecution. The streamlined process can effectively expedite enforcement and prosecution actions against doxxing cases.

15. In 2024, the PCPD handled 442 doxxing cases (including doxxing cases proactively uncovered by PCPD’s online patrols and doxxing-related complaints received). The figure significantly dropped by 42% when compared with 756 cases in 2023, amongst which the number of doxxing cases uncovered through online patrols has dropped significantly from 231 cases in 2023 to 87 cases in 2024. This

indicated that the problem of doxxing on the Internet had been further put under control because of the PCPD’s strenuous efforts in combatting doxxing acts. Among the 442 doxxing cases mentioned above, 355 were doxxing complaints received by the PCPD. The nature of disputes leading to these 355 doxxing cases mainly involved monetary disputes (46%), as well as family and relationship disputes (25%).

16. During the year, the PCPD initiated 118 criminal investigations, and 40 doxxing cases which involved suspected contravention of section 64(3C) of the Ordinance (namely the more serious doxxing offence) and/or other offences outside the purview of the Ordinance were referred to the Police for further investigation.

17. The PCPD arrested 20 persons in 2024. The doxxing acts were mainly committed on social media platforms and instant messaging apps (60%) and through posters (20%).

18. Among the doxxing complaints handled by the PCPD, the nature of disputes that led to doxxing of the victims were as follows:

Motives for doxxing	October 2021 to 2023 (cases)	Percentage	2024 (cases)	Percentage	Total (cases)
Monetary disputes	445	34%	163	46%	608
Family & relationship disputes	320	24%	90	25%	410
Work disputes	136	11%	23	6.5%	159
Political disputes	123	9%	10	3%	133

Property management and neighbourhood disputes	42	3%	9	3%	51
Online activity disputes	15	1%	11	3%	26
Pet-related disputes	7	1%	1	0.5%	8
Others	228	17%	48	13%	276
Total	1 316	100%	355	100%	1 671

19. Apart from bringing doxxers to justice through criminal investigation and prosecution, it is imperative that doxxing messages are removed promptly to preempt further harm to victims. In this regard, the Amendment Ordinance confers statutory powers on the Privacy Commissioner to serve cessation notices on online platforms to demand the removal of doxxing messages. In 2024, the PCPD issued 194 cessation notices to 20 online platforms, requesting removal of over 5 300 doxxing messages. Apart from the removal of individual doxxing messages, 58 channels designated for doxxing were also successfully removed by the PCPD by issuing cessation notices. Notwithstanding most of the cessation notices were served on overseas operators of online platforms, the overall compliance rate on the removal of doxxing messages was over 96%.

20. Since the Amendment Ordinance took effect in October 2021, up to 31 December 2024, the PCPD handled 3 326 doxxing cases (including 1 671 doxxing-related complaints and 1 655 doxxing cases proactively uncovered by PCPD's online patrol) and initiated 372 criminal investigations. In the same period, the PCPD issued 2 072 cessation notices to 53 online platforms, requesting removal of over 33 600 doxxing messages. The overall compliance rate on the removal of doxxing messages was over 96%. Apart from the removal of individual doxxing

messages, 250 channels designated for doxxing were also successfully removed by the PCPD by issuing cessation notices.

21. 63 persons were arrested in the same period (including three persons arrested under three joint operations with the Police) for doxxing-related offences. In addition, 103 doxxing cases were referred to the Police for further investigation.

Compliance Checks and Data Breach Incidents

22. In 2024, the PCPD received 203 data breach notifications, which represented an increase of nearly 30% as compared to 157 data breach notifications in 2023. The data breach incidents involved loss of documents or portable devices, inadvertent disclosure of personal data by email, post or fax, employees' misconduct, system misconfiguration, and hacking, etc.. The data breach incidents reported by the private organisations and non-private organisations were 136 cases (67%) and 67 cases (33%) respectively.

23. In 2024, the PCPD initiated 400 compliance checks, which is comparable to the 393 compliance checks in 2023.

Publication of Six Investigation Reports by the PCPD

24. In 2024, the PCPD published six investigation reports in relation to six data breach incidents respectively reported by Hong Kong Cyberport Management Company Limited, the Electrical and Mechanical Services Department, Consumer Council, The Council of the Hong Kong Laureate Forum Limited, The Hong Kong Ballet Limited, and South China Athletic Association. The Privacy Commissioner found that the abovementioned organisations had not taken all practicable steps to ensure that the personal data involved were protected against unauthorised or accidental access, processing, erasure, loss or use, thereby contravening DPP 4(1) of the Ordinance concerning the security of personal data. Simultaneously,

Cyberport and EMSD had not taken all practicable steps to ensure that the personal data involved were not kept longer than was necessary for the fulfilment of the purpose for which the data were used, thereby contravening DPP 2(2) of the Ordinance concerning the retention of personal data. The Privacy Commissioner served Enforcement Notices on the organisations concerned directing them to take measures to remedy the contraventions and prevent recurrence of similar contraventions in future.

Publication of Report on “Privacy Concerns on Electronic Food Ordering at Restaurants”³ and Leaflet on “Food Ordering Using Mobile Apps or QR Codes at Restaurants: Tips for Protecting Privacy”⁴

25. Between November 2023 and January 2024, the PCPD paid visits to 60 restaurants that offered self-ordering through mobile applications or QR codes in order to carry out tests on the collection and use of customers’ personal data by the restaurants concerned when providing electronic ordering services. The PCPD published the report on “Privacy Concerns on Electronic Food Ordering at Restaurants” and a leaflet on “Food Ordering Using Mobile Apps or QR Codes at Restaurants: Tips for Protecting Privacy” to provide specific recommendations on personal data privacy protection to the food and beverage industry and the public.

Compliance Checks of All Credit Reference Agencies in Hong Kong

26. The PCPD proactively commenced compliance checks of all credit reference agencies in Hong Kong to ensure the protection of the personal data privacy of borrowers and the data security of credit reference databases. The compliance checks were carried out to ascertain whether the security measures and retention

³ The report on “Privacy Concerns on Electronic Food Ordering at Restaurants” is available at the following link (Chinese only):

https://www.pcpd.org.hk/tc_chi/resources_centre/publications/files/foodordering_report.pdf

⁴ The leaflet on tips for protecting privacy when ordering food is available at the following link:

https://www.pcpd.org.hk/english/resources_centre/publications/files/foodordering_leaflet.pdf

periods adopted by credit reference agencies regarding the credit data of borrowers comply with the requirements of the Ordinance. The PCPD completed the compliance checks in January 2024 against credit reference agencies in Hong Kong and made recommendations to all credit reference agencies, assisting them to enhance their data security measures.

*Publication of Report on “Privacy Protection in the Digital Age: A Study of the Collection of Personal Data by 10 Online Travel Platforms”*⁵

27. In November 2024, the PCPD published a report on “Privacy Protection in the Digital Age: A Study of the Collection of Personal Data by 10 Online Travel Platforms”, which reviewed 10 online travel platforms (including the relevant websites and mobile applications) commonly used by citizens (namely, Agoda, EGL Tours, Expedia, Goldjoy Holidays, Miramar Travel, Sunflower Travel, Travel Expert, Trip.com, Wing On Travel and WWPKG) to understand how these platforms collect and use the personal data of their users. Based on the review findings, the PCPD provided recommendations to the operators of online travel platforms on the best practices and enhancement of privacy protection.

(III) Work Done on Data Security

28. In response to the rising trend of personal data breach incidents in recent years, the PCPD stepped up its efforts in different aspects to assist organisations in addressing data security issues:

- (a) Providing “Data Security” tools to support the industries: including
 - (i) launching a one-stop thematic webpage on “Data Security”;
 - (ii) establishing the “Data Security Scanner” for organisations to evaluate the security level of their data security measures;

⁵ The report on privacy protection measures in online travel platforms is available at the following link (Chinese only):

https://www.pcpd.org.hk/tc_chi/resources_centre/publications/files/10_online_travel_platforms.pdf

- (iii) introducing a “Data Security Hotline” for receiving enquiries from industry; (iv) publishing data security guidelines, for example, “Guidance on Data Breach Handling and Data Breach Notifications” and “Guidance Note on Data Security Measures for Information and Communications Technology”, etc.;
- (b) Strengthening collaboration with industry: including (i) organising training talks for organisations to promote data security management, and data security seminars for the public, educational sector and non-profit organisations; (ii) collaborating with the Hong Kong Police Force, the Digital Policy Office and the Hong Kong Monetary Authority to organise or participate in seminars and activities relating to data security and handling of data breach incidents; (iii) organised the “Privacy-Friendly Awards” to recognise the performance of organisations in protecting personal data privacy; and
- (c) Organising various promotional activities: including (i) arranging a mobile exhibition truck to conduct publicity in the community for “Privacy Awareness Week 2024” under the theme of “Safeguard Data Security • Safeguard Privacy”; (ii) introducing “Data Guardian”, a data security mascot; (iii) publishing articles in Chinese and English newspapers, online media and professional journals to promote and explain to the public and the industries the importance of data security.

(IV) Work Done on Artificial Intelligence

29. With the rapidly increasing use of AI, businesses of all sizes have begun to explore the potential of the technology in their operations. To assist organisations in adopting AI while safeguarding the personal data privacy of individuals, the PCPD promoted and advocated for good practices in privacy protection in the use of AI technology through various forms, including:

- The PCPD co-organised an international conference entitled “Enhancing Personal Data Protection in the Age of Artificial Intelligence” with the Faculty of Law and the AI & Humanity Lab of the University of Hong Kong in January 2024. The two-day conference attracted over 330 participants, including regulators, practitioners from law firms, academia, AI experts and stakeholders from around the world;
- To understand the implications of the development and use of AI on personal data privacy in Hong Kong, the PCPD carried out compliance checks on 28 local organisations from August 2023 to February 2024 to understand their practices in relation to the collection, use and processing of personal data in the development or use of AI, as well as the AI governance structure of the relevant organisations. The PCPD has found no contravention of the Ordinance during the compliance check;
- The PCPD issued the Model Framework in June 2024 to provide internationally well-recognised and practical recommendations and best practices to assist organisations in procuring, implementing and using AI, including generative AI, in compliance with the relevant requirements of the Ordinance, so as to harness the benefits of AI while safeguarding personal data privacy;
- The PCPD organised an AI practical workshop in July 2024 for nearly 100 secondary school students to learn the privacy risks associated with AI and how to use AI responsibly through a thematic talk and interactive AI games;
- The PCPD organised two topical seminars in hybrid mode on AI and privacy protection in July and September 2024, respectively, to elaborate on the best practices for organisations to procure, implement and use AI systems that involve the handling of personal data. Over 1 300 participants attended the seminars; and

- To illustrate that it is easy to produce fake videos in the AI era, the Privacy Commissioner demonstrated instant face swapping through AI deepfake technology on social media platforms in August 2024 so as to raise public awareness of fraud prevention.

(V) Responding to Enquiries

30. In 2024, the PCPD received a total of 18 125 enquiries, representing an increase of 14% as compared with 15 914 enquiries in 2023. Most of the enquiries were related to the collection and use of personal data (27%), PCPD's complaint handling policy (11%), employment issues (6%), access to and correction of personal data (6%) and the installation and use of CCTV (5%).

(VI) Appeals lodged with the Administrative Appeals Board

31. A total of 48 appeal cases were received in 2024, of which 38 were made against the Privacy Commissioner's decisions of not carrying out a formal investigation or terminating an investigation, and 10 against the Privacy Commissioner's decisions of serving or not serving an Enforcement Notice after investigation. During the year, the Administrative Appeals Board handed down a total of 16 decisions (including decisions on the appeals lodged in the previous years), in which 12 cases were dismissed, one case was partly allowed, and three cases were allowed and remitted to the PCPD for further investigation.

(VII) Promotion, Publicity and Public Education

Promotional and Educational Work to Combat Doxxing

32. During the year, the PCPD organised 39 seminars or webinars on combatting doxxing for various sectors, attracting nearly 8 600 participants. This included conducting the School Touring of Anti-doxxing Education Talks for over 8 100

students from 33 secondary schools. In addition, the PCPD continued to broadcast videos relating to the Amendment Ordinance and anti-doxxing on online platforms to unwaveringly promote anti-doxxing messages.

Disseminating Messages on the Protection of Personal Data Privacy

33. In 2024, the PCPD continued to organise physical or online seminars and professional workshops on various topics for stakeholders. A total of 441 professional workshops, online or physical seminars and meetings with stakeholders were held with around 54 000 participants.

34. During the reporting year, the PCPD provided stakeholders and members of the public with advice on a variety of issues relating to personal data privacy by issuing advisories, guidelines, pamphlets and media statements and responding to media enquiries.

35. The PCPD issued a total of 70 media statements, responded to 245 media enquiries and gave 49 radio, television and newspaper interviews in 2024, which covered topics including personal data breach incidents and data security, challenges to personal data privacy brought about by the use of generative AI, enforcement actions taken by the PCPD against the Worldcoin project and doxxing offences, review of the collection of personal data by online travel platforms and electronic food ordering services and the prevention of personal data fraud, etc.. The PCPD issued 645 posts on different social media platforms to provide the latest news and developments pertinent to privacy protection.

36. Over the past year, the PCPD issued multiple publications on various hot topics, providing stakeholders with practical guidance and compliance recommendations. As smartphones and social media have become indispensable parts of our daily lives, the PCPD published two leaflets entitled “Protect Your Personal Data - Smart Use of Smartphones” and “Protect Your Personal Data - Be

Smart on Social Media”, respectively, to provide tips for users on the smart use of smartphones and social media to help them protect their personal data.

37. Moreover, the PCPD issued new versions of “Code of Practice on the Identity Card Number and other Personal Identifiers: Compliance Guide for Data Users” and an information leaflet titled “Your Identity Card Number and Your Privacy” to assist organisations in complying with relevant requirements and to explain to the public about how to protect personal data privacy concerning identity card numbers and copies in their daily lives.

Privacy Awareness Week 2024

38. To raise the awareness of safeguarding data security among organisations and members of the public, the PCPD organised the annual flagship event “Privacy Awareness Week 2024” with the theme of “Safeguard Data Security • Safeguard Privacy”. A series of promotional and educational activities were held in May 2024, including: (i) launching a mobile exhibition truck, the “Privacy Protection Truck”, to reach out to the community, where visitors could increase their understanding of the importance of protecting personal data privacy and data security through watching educational videos, reading relevant publications and playing interactive games; (ii) organising a data security seminar to share recent data breach cases and relevant data security measures; and (iii) introducing a data security mascot, “Data Guardian”, to promote data security through different channels, including major public transportation terminals, social media, online platforms, newspapers, etc..

Published “Personal Data (Privacy) Law in Hong Kong – A Practical Guide on Compliance (Third Edition)”

39. In support of 2024 China Cybersecurity Week, the PCPD collaborated with the City University of Hong Kong Press in publishing the third edition of “Personal Data (Privacy) Law in Hong Kong – A Practical Guide on Compliance”. A book

launch was held in September 2024. The new book provides a comprehensive overview and explanations of the requirements and data protection principles under the Ordinance, and encompasses an account of the supervision and enforcement work carried out by the PCPD pursuant to provisions of the Ordinance. Three new chapters of this new edition are added, namely, the anti-doxxing regime, cross-border transfers of personal data from Hong Kong, and the Mainland's personal information protection regime, respectively.

Engaging Youngsters

40. During the reporting year, the PCPD launched the “Student Ambassador for Privacy Protection Programme – Partnering Schools Recognition Scheme 2024”. 67 secondary schools have become “Partnering Schools” to join hands with the PCPD in disseminating anti-doxxing messages by organising educational talks, broadcasting educational videos and distributing promotional materials, with a total of more than 17 000 students participating in the activities.

41. The PCPD also organised the “Future Leaders of AI and Privacy Protection Training Programme”, which included a topical seminar and an interactive workshop on AI, allowing participating students to acquaint themselves with the applicable standards in using AI in compliance with the provisions of the Ordinance, as well as the operation of the personal data privacy management programme. The Programme was supported by the Education Bureau and organisations from the technology and education sectors. A total of 90 secondary school students completed the training.

42. To raise secondary school students' awareness of personal data protection when using social media and cultivate the right attitude of saying “no” to cyberbullying and doxxing, the PCPD has organised the School Touring of Anti-doxxing Education Talks to explain relevant information to secondary school

students onsite. During the reporting year, the PCPD visited 33 secondary schools to hold the anti-doxxing education talks for over 8 100 students.

Raising Public Awareness of Fraud Prevention

43. In view of the ever-evolving deceptive tactics used by fraudsters, it is crucial to raise public awareness of the prevention of fraud. The PCPD set up the “Personal Data Fraud Prevention Hotline”, 3423 6611, in 2022, dedicated to handling enquiries or complaints from members of the public in relation to suspected data fraud cases. In 2024, the PCPD received 1 158 enquiries relating to suspected personal data frauds, which represented a 46% increase when compared to 793 cases in 2023. The PCPD also launched the webpage entitled “Anti-Fraud Tips”, with a view to providing a one-stop information portal for members of the public. Moreover, the PCPD, through the issuance of media statements, urged the public and organisations to guard against the ever-evolving deceptive tactics used by fraudsters, particularly fraudulent recruitment advertisement scams as well as scam videos using AI deepfake technology. To illustrate that it is easy to produce fake videos in the AI era, the Privacy Commissioner has previously demonstrated instant face swapping through AI deepfake technology on social media platforms.

44. In addition, the PCPD launched a series of anti-fraud publicity activities under the theme of “Don’t Hand Over Your Personal Data – Beware of Fraudsters”, which included producing promotional videos, distributing promotional posters, organising thematic seminars and promoting anti-fraud messages across major public transportation networks and online platforms. To enhance the anti-fraud awareness of the elderly, the Privacy Commissioner and the PCPD’s Volunteer Team reached out to the community during the Mid-Autumn Festival and Christmas periods and shared tips on fraud prevention with the elderly through visits and gatherings.

45. Highlights and figures of the PCPD’s promotion, publicity and public education work in 2024 are detailed in the **Annex**.

(VIII) International and Mainland Connections

46. The PCPD has been dedicated to facilitating cross-boundary flows of personal data within the Guangdong–Hong Kong–Macao Greater Bay Area (Greater Bay Area). To ensure that personal data remain adequately protected in the borderless flows of data, the PCPD has also been establishing closer cooperations and regularly exchanging experiences on matters in relation to personal data privacy with data or privacy protection authorities around the world to jointly address the increasingly complex privacy protection challenges in the digital age.

47. In 2024, the PCPD remained active in various international and regional forums, including the Global Privacy Assembly (GPA)⁶, the Asia Pacific Privacy Authorities (APPA)⁷ and the Global Privacy Enforcement Network (GPEN)⁸, etc..

48. Apart from attending the 61st APPA forum in June 2024, the PCPD also attended the 62nd APPA forum in November 2024 during which the Privacy Commissioner attended bilateral meetings with regulators from Japan, Korea, Singapore and Italy and explored a variety of data protection issues and the potential areas for collaboration. Besides, the PCPD attended the 46th GPA from late October to early November 2024 and has been a co-chair of the GPA’s Ethics and Data Protection in AI Working Group (AIWG) since October 2024. Meanwhile, the PCPD continues to be the co-chair of the International Enforcement Cooperation Working Group (IEWG) of the GPA.

⁶ The GPA is the leading international forum for over 130 data protection authorities from around the globe to discuss and exchange views on privacy issues and the latest international developments.

⁷ APPA serves as the principal forum for privacy and data protection authorities in the Asia Pacific region to strengthen cooperation, discuss best practices and share information on privacy regulations and emerging technologies.

⁸ The GPEN was established to foster cross-border cooperation among privacy enforcement authorities. It comprises over 80 law enforcement agencies around the globe that have enforcement powers on personal data and privacy protection.

49. In respect of collaboration with the Mainland, cross-boundary data flows are an important driving force for building a “Digital Bay Area”, and the flows of data facilitate the development of Hong Kong as a data centre. To dovetail with the Government’s policy initiative in advancing the development of digital government, the PCPD has been actively engaging in communications with the relevant organisations in the Greater Bay Area, including arranging representatives to attend the “2024 China Cybersecurity Week - Meeting on Cooperation in the Cross-boundary Data Flow Within the Greater Bay Area” held in Nansha, Guangzhou, and the forum at “2024 World Internet Conference” held in Wuzhen, Zhejiang Province, in September and November 2024, respectively, and exchanged views with Mainland regulatory authorities, experts and scholars on issues relating to cross-boundary data flows, so as to understand the development in establishing and promoting digital economy in the Mainland.

(IX) Strategic Focus 2025

Robust Enforcement

50. Since the Amendment Ordinance came into effect in October 2021, the PCPD has been striving to enforce the new doxxing provisions to deter and combat doxxing acts in order to safeguard personal data privacy.

51. Although the problem of doxxing on the Internet has greatly ameliorated, the PCPD will keep on taking resolute enforcement actions. Apart from conducting regular online patrols, the PCPD will continue to strengthen its internal training on cyber-crime investigation and digital forensic examination to effectively continue conducting criminal investigation and collecting evidence on a “one-stop” basis. In parallel, the PCPD will continue to raise public awareness through promotion and education to curb doxxing acts. In 2025, the PCPD will continue to organise the

School Touring of Anti-doxxing Education Talks to promote anti-doxxing and anti-cyberbullying messages to more secondary school students.

Promoting Data Security, Strengthening Education

52. Enhancing data security will continue to be one of the major areas of work of the PCPD in the coming year. In addition to the “Data Security Trio” (i.e. the “Data Security Scanner” self-assessment toolkit, the Data Security thematic webpage and the “Data Security Hotline”), the PCPD also launched the “Data Security” Package for schools, NGOs and SMEs. Organisations will receive free quotas to join professional workshops and seminars organised by the PCPD upon completion of an assessment by the “Data Security Scanner”.

53. Looking ahead, the PCPD will continue to promote and raise the awareness of data security with its publicity and public education work in different forms and scales. To help SMEs enhance their data security, the PCPD and the Hong Kong Productivity Council will jointly roll out the Data Security Training Series in 2025. The series will cover topics including: (i) lessons from data breach cases in recent years; (ii) recommended data security measures; and (iii) how to prevent and handle a data breach incident. In addition, the PCPD will organise the annual flagship event “Privacy Awareness Week”, with the theme of AI and data security, and hold a series of promotional activities, including a symposium for SMEs and non-profit making organisations, with a view to assisting them in strengthening their capability in safeguarding data security.

Strengthening Privacy Protection to Support the Development of Digital Economy

54. The “Outline of the 14th Five-Year Plan for National Economic and Social Development of the People’s Republic of China and the Long-Range Objectives Through the Year 2035” (“14th Five-Year Plan”) clearly states the Country’s commitment to developing digital economy, promoting digital industrialisation and

industry digitisation, and deepening the integration of digital technologies with the economy, thereby building a globally competitive cluster of digital-based industries. It also affirms support for Hong Kong’s development as an international I&T hub. Besides, the “Hong Kong I&T Development Blueprint” promulgated by the Government in December 2022 aimed to “promote digital economy development and develop Hong Kong into a smart city” and “accelerate the development of digital economy and smart city to enhance citizens’ quality of life”, respectively, as part of the four development directions and eight major strategies. The Chief Executive’s Policy Address 2024 also stated that the Government will expedite the development of digital economy, which includes accelerating the digital transformation of industries, strengthening digital infrastructure, etc..

55. The PCPD has been paying close attention to various new measures implemented for the development of Hong Kong into a smart city, such as the “iAM Smart” application, which facilitates citizens’ use of one-stop electronic government services, the Consented Data Exchange Gateway (CDEG), which facilitates data interchange within the Government, the connection arrangement between the CDEG and the Hong Kong Monetary Authority’s Commercial Data Interchange, etc., and providing professional advice and recommendations to the Government and relevant organisations continuously from the perspective of personal data privacy protection to ensure that the relevant measures comply with the requirements of the Ordinance.

Addressing the Challenges Posed by the Development of Emerging Technologies

56. As the popularity of AI technology rapidly grows, enterprises will invest more resources in applying AI and its technologies. In view of this, the PCPD intends to issue additional guidelines in relation to the use of AI in the first half of 2025 to assist organisations in developing internal policies for the use of generative AI by employees at work.

57. In addition, to assist organisations in complying with the relevant requirements of the Ordinance when using AI, the PCPD will continue to organise promotional activities related to AI and personal data privacy issues in 2025. This includes the introduction of the “Best AI Governance Award” in the “Privacy-Friendly Awards” 2025, with a view to encouraging organisations to adopt the Model Framework published by the PCPD.

58. Furthermore, to align with international developments in privacy protection and address the challenges posed by cyber technologies, the PCPD is working closely with the Government to review the implementation of the Ordinance and formulate legislative amendments proposals to better protect personal data privacy.

59. The PCPD will make reference to relevant laws and experiences of other jurisdictions and take into account the actual situation in Hong Kong so as to put forward practicable legislative amendment proposals in a timely and appropriate manner. Preliminary legislative amendment proposals include: (1) establishing a mandatory data breach notification mechanism; (2) directly regulating data processors; (3) requiring data users to formulate policies on personal data retention period; (4) strengthening sanctions and empowering the Privacy Commissioner to impose administrative fines; (5) clarifying the definition of personal data, etc..

60. In 2024, the PCPD conducted preliminary consultations on the amendment directions and proposals, including consulting with the Personal Data (Privacy) Advisory Committee and the Standing Committee on Technological Developments, as well as different organisations and stakeholders. In light of the concerns of industry that the strengthening of sanctioning powers may increase compliance costs of SMEs under the current economic environment, the Government and the PCPD will consider appropriate adjustments to the legislative amendment proposals, for example, whether to effect the legislative amendments by phases, thereby reducing the possible impact on business sectors; and how to suitably determine the amount of administrative fines to ensure that they are set at an acceptable level while not

losing deterrent effect. The Government and the PCPD will carefully review the most proper and appropriate timing for introducing the proposed legislative amendments and consult the Legislative Council of the specific legislative proposals concerning the Ordinance at an appropriate juncture.

Promotion, Publicity and Public Education

61. In 2025, in addition to strengthening publicity and promotion of data security and AI privacy protection, the PCPD will launch its flagship event “Privacy-Friendly Awards 2025” with the theme of “Safeguarding Data Security: Marching towards a New Digital Era”, which aims to encourage organisations to implement good data governance and strengthen data security.

62. The PCPD will continue to promote the public’s understanding of and compliance with the Amendment Ordinance to combat doxxing acts through public education. More publicity activities will also be rolled out to raise awareness of guarding against fraud and protecting personal data privacy among members of the public, thereby preventing them from falling prey to scams. The PCPD will also continue to promote the importance of respecting and protecting personal data privacy among youngsters through talks and educational activities, including organising the “Privacy Campaign for Primary Schools 2025”.

63. To further enhance public awareness of guarding against fraud and protecting personal data privacy, the PCPD will roll out more publicity activities in relation to fraud prevention, including broadcasting anti-fraud promotional videos on TVs, online platforms and lobby TVs in residential buildings, displaying posters at bus shelters, organising elderly visits to share tips on fraud prevention with the elderly, collaborating with universities to organise talks to prevent students from falling prey to scams, etc..

International and Mainland Connections

64. Under “One Country, Two Systems”, Hong Kong has the distinctive advantages of enjoying strong support from the Motherland while being closely connected to the world. On the international front, the PCPD will continue to actively participate in various international and regional collaborations, including international and regional forums, with a view to keeping abreast of the latest trends in global privacy protection in the digital age and telling the good stories of China, including those of Hong Kong. In addition, as the co-chair of the AIWG and IEWG of GPA, the PCPD will continue to collaborate with its international counterparts in addressing the ever-evolving challenges of privacy protection.

(X) Conclusion

65. Members are invited to note the content of this paper.

Office of the Privacy Commissioner for Personal Data, Hong Kong

February 2025

**Highlights and Figures of the PCPD’s Promotion, Publicity and Public
Education Work in 2024**

1. Publicity and Education Materials Published for Organisations and General Public

Book:

- Personal Data (Privacy) Law in Hong Kong – A Practical Guide on Compliance (Third Edition)

Guidance:

- Artificial Intelligence: Model Personal Data Protection Framework
- Code of Practice on the Identity Card Number and other Personal Identifiers: Compliance Guide for Data Users

Report:

- Privacy Concerns on Electronic Food Ordering at Restaurants
- Privacy Protection in the Digital Age: A Study of the Collection of Personal Data by 10 Online Travel Platforms

Information Leaflet:

- Food Ordering Using Mobile Apps or QR Codes at Restaurants: Tips for Protecting Privacy
- Protect Your Personal Data - Smart Use of Smartphones
- Protect Your Personal Data - Be Smart on Social Media
- Leaflet on “Artificial Intelligence: Model Personal Data Protection Framework”
- Your Identity Card Number and Your Privacy
- Note for Job Applicants on Disclosure of Criminal Records

2. Public Education

- 441 professional workshops, talks, seminars, webinars and meetings with stakeholders were held with 53 977 participants
- 25 promotional and educational activities, with over 2 million participants
- Privacy Awareness Week with the theme of “Safeguard Data Security • Safeguard Privacy!”

3. Industry Specific Campaign

- Organisation of 9 seminars or webinars for five sectors, namely legal, medical and healthcare, information technology, education and financial sectors, with a total of around 4 300 participants

4. Social Media

- 645 social media posts uploaded

5. Promotional Activities for the Personal Data (Privacy) (Amendment) Ordinance 2021

- Published the “Personal Data (Privacy) Law in Hong Kong – A Practical Guide on Compliance (Third Edition)” in which a chapter on the anti-doxxing regime was added
- Conducted 39 seminars/webinars with over 8 600 attendees

6. Thematic Seminars on Topical Personal Data Privacy Issues

- International Conference on “Enhancing Personal Data Protection in the Age of Artificial Intelligence” (Co-organised with the Faculty of Law and the AI & Humanity Lab of the University of Hong Kong)

- Medical and Healthcare Sector – Experience Sharing Session on Good Data Governance
- Seminar on “Responding to Cyber Security Threats and Data Breaches”
- Seminar on “Cross-boundary Flow of Personal Information Within the Greater Bay Area”
- Seminar on “Lessons from Data Breach Cases and Recommended Data Security Measures”
- Seminar on “Beware of Scams – Protect Your Personal Data”
- Seminar on “Personal Data Privacy and Protection in Higher Education” (Co-organised with Information Technology Services – Data Protection Office of the University of Hong Kong)
- Seminar on “AI and Privacy Protection: Balancing Innovation and Safety”
- Seminar on “Personal Data Management – Recommended Measures to Enhance Data Security and to Handle Data Breaches” (Co-organised with Hong Kong Monetary Authority and Hong Kong Association of Banks)
- Seminar on “Data Protection and Data Access Request” (Co-organised with the Hong Kong Institute of Bankers)
- Experience Sharing Session for Businesses on “AI and Personal Data Privacy”
- Seminar on “Preventing and Handling Data Breach Incidents and Enhancing Data Security Measures for the Education Sector”

7. Educational Activities for Youngsters

- Organised “Student Ambassador for Privacy Protection Programme – Partnering Schools Recognition Scheme 2024” cum “Future Leaders of AI and Privacy Protection Training Programme”
- Conducted School Touring of Anti-doxxing Education Talks for over 8 100 students from 33 secondary schools