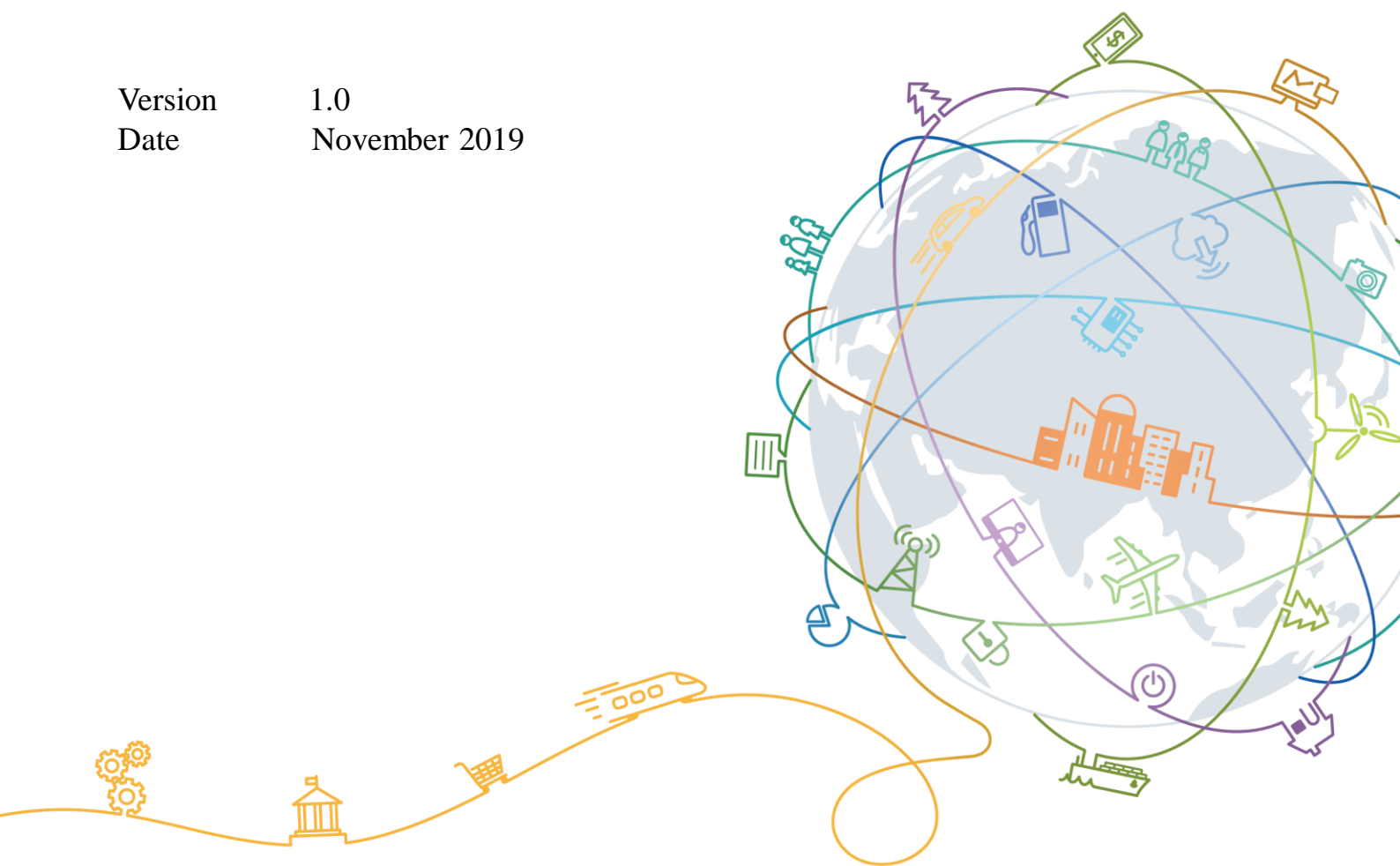


HUAWEI CLOUD Compliance with Singapore PDPA

Version 1.0
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HUAWEI TECHNOLOGIES CO., LTD.



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1. Introduction

1.1. Scope of Application

The information provided in this document applies to HUAWEI CLOUD and all its products and services.

1.2. Purpose of Publication

This document is intended to help customers understand how HUAWEI CLOUD's business-related activities comply with Singapore's Personal Data Protection Act (PDPA) requirements, and HUAWEI CLOUD's measures to protect personal data security. In addition, it helps customers understand the different roles and considerations of customers and HUAWEI CLOUD in cloud service mode.

1.3. Basic Definition

- **Organization** - Any individual, company, association or body of persons, corporate or unincorporated, whether or not formed or recognized under the law of Singapore; or resident, or having an office or a place of business in Singapore.
- **Personal data** - Data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which the organization has or is likely to have access.
- **Content data** - Data stored or processed during the use of HUAWEI CLOUD services, including but not limited to documents, software, images, and audio and video files.
- **Collecting** - Any individual or series of actions involved in the acquisition of control over personal data or the possession of personal data by an organization.
- **Processing** - In relation to personal data, this means the carrying out of any operation or set of operations in relation to the personal data and includes any of the following: recording, holding, organization, adaptation or alteration, retrieval, combination, transmission, and erasure or destruction.
- **Using** - Any or a series of actions that an organization uses personal data.
- **Disclosure** - Any individual or series of actions by which an organization discloses, transfers or otherwise provides to any other organization personal data that it controls or owns.



2. HUAWEI CLOUD Privacy Protection Strategy

2.1. HUAWEI CLOUD Privacy Commitment

HUAWEI CLOUD has placed cyber security and privacy protection as top priorities. HUAWEI CLOUD has fully integrated cyber security and privacy protection into each cloud service and promises to provide customers with stable, reliable, secure, trustworthy, and evolvable services while respecting and protecting customers' privacy.

HUAWEI CLOUD solemnly treats and actively takes the corresponding responsibilities to comply with global privacy protection laws and regulations. HUAWEI CLOUD sets up professional privacy protection teams, develops and optimizes processes, actively develops new technologies, and continuously builds HUAWEI CLOUD privacy protection capabilities to achieve HUAWEI CLOUD's privacy protection objectives: safeguarding strict service boundaries, protecting customers' personal data security, and helping customers implement privacy protection.

2.2. HUAWEI CLOUD Basic Privacy Protection Principles

- **Lawfulness, fairness and transparency:** HUAWEI CLOUD processes personal data lawfully, fairly and in a transparent manner in relation to the data subject.
- **Purpose limitation:** HUAWEI CLOUD collects personal data for specified, explicit and legitimate purposes and will not further process the data in a manner that is incompatible with those purposes.
- **Data minimization:** When HUAWEI CLOUD processes personal data, personal data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which the data is processed. Personal data is anonymized or pseudonymized if possible to reduce the risks for data subjects.
- **Accuracy:** HUAWEI CLOUD ensures that personal data is accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, and is erased or rectified without delay.
- **Storage limitation:** Personal data is kept for no longer than is necessary for the purposes for which the personal data is processed.
- **Integrity and confidentiality:** Taking into account the existing technical capabilities, implementation cost, and likelihood and severity of privacy risks, HUAWEI CLOUD processes personal data in a manner that ensures appropriate security of the personal data, including protection against accidental or unlawful destruction, loss, and alteration, or unauthorized access and disclosure by using appropriate technical or organizational measures.
- **Accountability:** HUAWEI CLOUD is responsible for and able to demonstrate compliance with the preceding principles.

2.3. Privacy Protection Responsibilities

As a cloud service provider (CSP), HUAWEI CLOUD is responsible for the security of the cloud platform infrastructure. HUAWEI CLOUD ensures that all business related activities comply with the requirements of laws and regulations. HUAWEI CLOUD provides various privacy protection technologies for customers to help customers protect privacy based on business requirements.

Customers have full control over their content data. They shall correctly and comprehensively identify personal data on the cloud, select appropriate services, and develop security and personal data protection policies to protect personal data. At the same time, customers can use HUAWEI CLOUD's various privacy protection services to enhance the protection of personal data.

The following figure is the HUAWEI CLOUD's Responsibility Sharing Model. This model helps customers better understand the responsibility of HUAWEI CLOUD in the field of privacy protection and the key points that customers need to pay attention to.

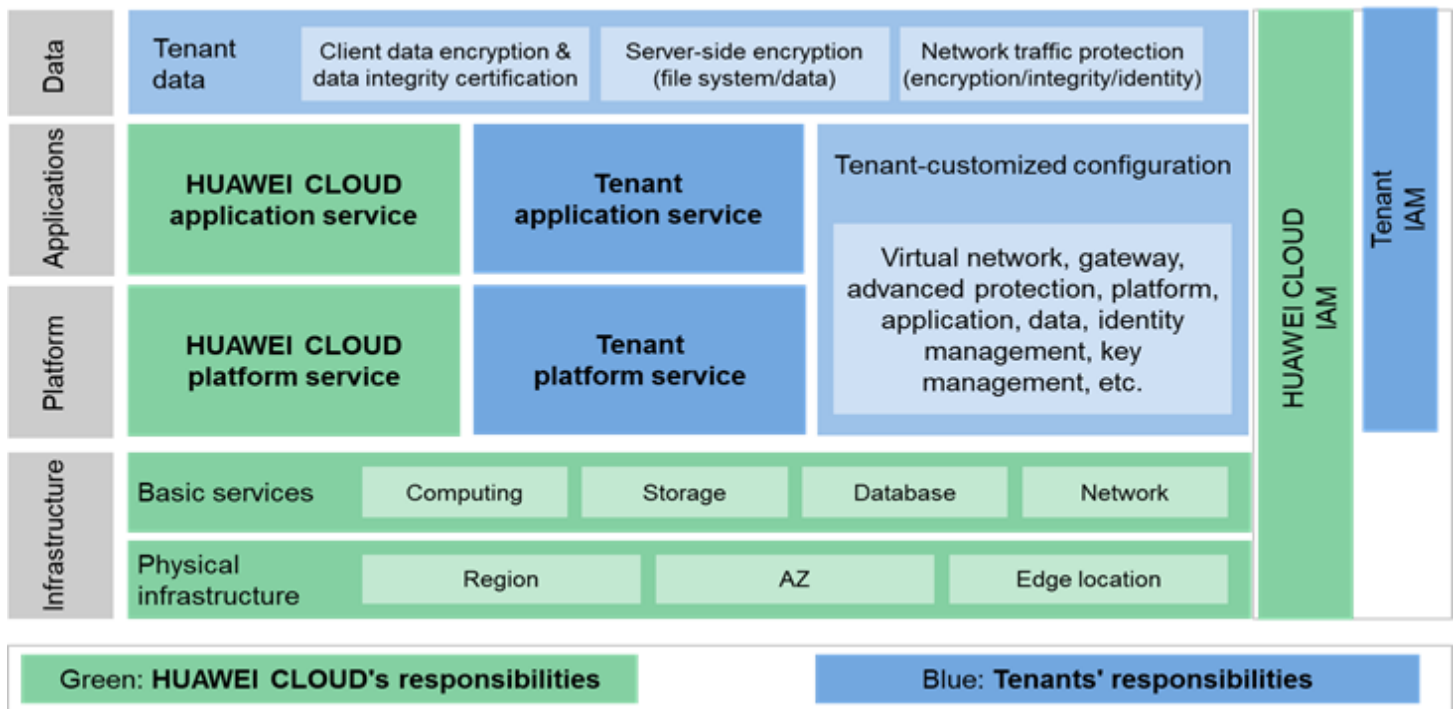


Figure 1: Responsibility Sharing Model

For details on the privacy protection responsibilities of both customers and HUAWEI CLOUD, please refer to the *White Paper for HUAWEI CLOUD Privacy Protection*¹ released by HUAWEI CLOUD.

¹ https://intl.huaweicloud.com/content/dam/cloudbu-site/archive/hk/en-us/securecenter/security_doc/PrivacyWhitepaper_en.pdf



2.4. HUAWEI CLOUD Privacy Protection Related Certification

HUAWEI CLOUD complies with all local applicable privacy laws and regulations. HUAWEI CLOUD has a professional legal team, which closely monitors the update of laws and regulations, continuously tracks and analyzes global laws and regulations, and ensures compliance with laws and regulations.

HUAWEI CLOUD's capabilities and achievements in privacy protection and personal data security have been widely recognized by third-party certifications around the globe. Up to now, HUAWEI CLOUD has obtained certifications² from more than 10 organizations in and outside China, including:

- **ISO 29151**

ISO 29151 is an international practical guide to the protection of personal identity information. The adoption of ISO 29151 confirms HUAWEI CLOUD's implementation of internationally recognized management measures for the entire lifecycle of personal data processing.

- **ISO 27701**

ISO 27701 specifies requirements for the establishment, implementation, maintenance and continuous improvement of a privacy-specific management system. The adoption of ISO 27701 demonstrates that HUAWEI CLOUD operates a sound system for personal data protection.

- **ISO 27018**

ISO 27018 is an international code of conduct that focuses on the protection of personal data in the cloud. The adoption of ISO 27018 indicates that HUAWEI CLOUD has met the requirements of an internationally complete personal data protection and management system.

- **BS 10012**

BS10012 is the personal information data management system standard issued by BSI. The BS10012 certification indicates that HUAWEI CLOUD offers a complete personal data protection system to ensure personal data security.

- **ISO 27001**

ISO 27001 is a widely used international standard that specifies requirements for information security management systems. This standard provides a method of periodic risk evaluation for assessing systems that manage company and customer information.

- **ISO 27017**

ISO 27017 is an international certification for cloud computing information security. The adoption of ISO 27017 indicates that HUAWEI CLOUD has achieved internationally recognized best practices in information security management.

² <https://intl.huaweicloud.com/en-us/securecenter/safetycompliance.html>

- **SOC (audit)**

The SOC audit report is an independent audit report issued by a third-party audit institution based on the relevant guidelines developed by the American Institute of Certified Public Accountants (AICPA) for the system and internal control of outsourced service providers. At present, HUAWEI CLOUD has passed the audit of SOC2 Type 1 Privacy Principle in terms of privacy, which proves that HUAWEI CLOUD has reasonable control measures in terms of cloud management and technology.

- **ISO 20000**

ISO 20000 is an international recognized information technology service management system (SMS) standard. It specifies requirements for the service provider to plan, establish, implement, operate, monitor, review, maintain and improve an SMS to make sure CSPs can provide effective IT services to meet the requirements of customers and businesses.

- **ISO 22301**

ISO 22301 is an internationally recognized business continuity management system standard that helps organizations avoid potential incidents by identifying, analyzing, and alerting risks, and develops a comprehensive Business Continuity Plan (BCP) to effectively respond to disruptions so that entities can recover rapidly, keep core business running, and minimize loss and recovery costs.

- **CSA STAR Gold Certification**

CSA STAR certification was developed by the Cloud Security Alliance (CSA) and the British Standards Institution (BSI), an authoritative standard development and preparation body as well as a worldwide certification service provider. This certification aims to increase trust and transparency in the cloud computing industry and enables cloud computing service providers to demonstrate their service maturity.

- **PCI DSS Certification**

Payment Card Industry Data Security Standard (PCI DSS) is the global card industry security standard, jointly established by five major international payment brands: JCB, American Express, Discover, MasterCard and Visa. It is the most authoritative and strict financial institution certification in the world..

- **International Common Criteria (CC) EAL3+ Certification**

Common Criteria (CC) certification is a highly recognized international standard for information technology products and system security. HUAWEI CLOUD FusionSphere passed CC EAL 3+ certification, indicating that the HUAWEI CLOUD software platform is highly recognized worldwide.

- **MTCS Level 3 (Singapore)**

The Multi-Tier Cloud Security (MTCS) specification is a standard developed by the Singapore Information Technology Standards Committee. This standard requires cloud service providers (CSPs) to adopt sound risk management and security practices in cloud computing. HUAWEI CLOUD Singapore has obtained the highest level of MTCS security rating (Level 3).

- **Certification for the Capability of Protecting Cloud Service User Data (China)**

This certification evaluates a CSP's ability to protect cloud data. Evaluation covers pre-event prevention, in-event protection, and post-event tracking.

- **Trusted Cloud Service (TRUCS) (China)**

Trusted Cloud Service (TRUCS) is one of the most authoritative public domain assessments in China. This assessment confirms that HUAWEI CLOUD complies with the most detailed standard for cloud service data and service assurance in China.

- **Classified Cybersecurity Protection (China)**

Classified Cybersecurity Protection issued by China's Ministry of Public Security is used to guide organizations in China through cybersecurity development. Today, it has become the general security standard widely adopted by various industries throughout China. HUAWEI CLOUD has passed the registration and assessment of Classified Cybersecurity Protection Class 3. In addition, key HUAWEI CLOUD regions and nodes have passed the registration and assessment of Classified Cybersecurity Protection Class 4.

- **Gold O&M (TRUCS)**

The Gold O&M certification is designed to assess the O&M capability of cloud service providers who have passed TRUCS certification. This certification confirms that HUAWEI CLOUD services operate a sound O&M management system that satisfies the cloud service O&M assurance requirements specified in Chinese certification standards..

- **Cloud Service Security Certification - Cyberspace Administration of China (CAC)**

This certification is a third-party security review conducted by the Cyberspace Administration of China according to the Security Capability Requirements of Cloud Computing Service. HUAWEI CLOUD e-Government Cloud Service Platform has passed the security review (enhanced level), indicating that Huawei e-Government cloud platform was recognized for its security and controllability by China's top cybersecurity management organization.

- **ITSS Cloud Computing Service Capability Evaluation by the Ministry of Industry and Information Technology (MIIT)**

ITSS cloud computing service capability evaluation is based on Chinese standards such as the General Requirements for Cloud Computing and Cloud Service Operations. It is the first hierarchical evaluation mechanism in China's cloud service/cloud computing domain. Huawei private and public clouds have obtained cloud computing service capability level-1 (top level) compliance certificates.

HUAWEI CLOUD actively focuses on the release of authoritative privacy certification mechanisms in the industry, and continuously raises higher requirements, optimizes its privacy protection system, and increases and updates security and privacy certifications. In addition, HUAWEI CLOUD works closely with privacy protection associations to explore cutting-edge privacy protection information and technologies to build its sustainable, secure privacy protection environment.



3. How HUAWEI CLOUD Meets Singapore PDPA Requirements

3.1. Singapore PDPA Overview

Singapore enacted the Personal Data Protection Act 2012 (PDPA)³ on October 15, 2012, which came into effect on July 2, 2014. PDPA generally regulates the organization's collection, use, and disclosure of personal data, safeguards the rights of individuals to protect their personal data, and recognizes the organization's need to collect, use, and disclose personal data for legitimate purposes.

3.2. PDPA Basic Principles and HUAWEI CLOUD Related Practices

HUAWEI CLOUD recognizes the principles of PDPA as a data controller and processor. Providing quality service to customers has always been the goal of HUAWEI CLOUD. Based on an in-depth analysis of Singapore's PDPA compliance requirements, HUAWEI CLOUD combines the understanding of customer business needs during the process of serving customers, and integrates HUAWEI CLOUD's advanced practices and technical capabilities to provide a variety of services that satisfy privacy protection requirements. This white paper will help customers understand the services provided by HUAWEI CLOUD in privacy protection compliance according to the core principles of PDPA.

HUAWEI CLOUD deeply understands the importance of customer content data in business. HUAWEI CLOUD adheres to a neutral attitude and maintains strict service boundaries, ensuring that data is owned and used only by customers and creates value for customers. In the process of using HUAWEI CLOUD, customers have full control over their content data:

Customers can determine where content data is stored.

HUAWEI CLOUD currently has data centers in multiple regions around the world, including Asia, Europe, and the Americas. The data centers in each region are physically isolated. If a customer requires a specific geographical location, they can choose different regions of HUAWEI CLOUD according to their needs. For example, if a customer in Singapore chooses a geographical site in Singapore, the customer's content data will be stored in the Singapore-based data center. HUAWEI CLOUD will not transfer customer content data to other regions without the customer's explicit consent, or unless other legal obligations are presented.

If there is a need to transfer customer content data containing personal data across borders and the customer requires HUAWEI CLOUD's assistance, they can contact and authorize HUAWEI CLOUD, who will then transfer the data according to the customer's authorization.

Customers can decide on their content data protection strategy.

By using different HUAWEI CLOUD services, customers can decide on a range of security-related factors, including whether their data is encrypted, what access policies are adopted, and whether logs are audited and how.

Customers should consider how to manage and protect personal data security and prevent personal data breach. If a breach does occur, customers should notify the regulatory agency without undue delay according to the corresponding laws and regulations.

³<https://sso.agc.gov.sg/Act/PDPA2012>



3.2.1. Notice and Consent

Organizations shall inform individuals in advance of the purpose of collecting, using, or disclosing personal data. The organization may only collect, use, or disclose personal data for personal consent or as authorized by PDPA or any other enacted law in Singapore.

Customer Considerations:

Customers have full control over their content data and decide whether to use HUAWEI CLOUD services to collect, use and disclose personal data and for what purpose. If the customer content data in HUAWEI CLOUD contains personal data, customers should inform the data subject and obtain their consent for the purpose of personal data collection.

At the same time, customers can use the functions provided by HUAWEI CLOUD products and services or self-developed capabilities to better implement the principles of notification and consent in the privacy protection regulations. HUAWEI CLOUD provides various configuration options on its official website, and customers can set the types of messages to be received and the means for receiving messages based on their preferences. For example, through HUAWEI CLOUD's Convergent Video Cloud Service (CVCS)⁴, customers can use the interface provided by HUAWEI CLOUD for signing and querying privacy statements to embed a function of agreeing or revoking privacy statements and recording related operation records, and to inform their users of the personal data processing policy. For cloud services related to personal data processing, HUAWEI CLOUD informs customers of the categories of personal data to be processed and the processing and storage means in the product documentation. Customers can then take privacy protection measures accordingly.

HUAWEI CLOUD Considerations:

After obtaining a customer's consent, HUAWEI CLOUD collects the customer personal data necessary for the provision of services, and provides a privacy notice to inform the customer of the categories of personal data to be collected, collection purposes, processing means, time limit, parties to disclosed, etc. HUAWEI CLOUD provides a Privacy Statement and the mechanism for customers to give and withdraw consent on its official website. When personal data is to be collected in offline marketing activities, a privacy notice is provided at a prominent position, and a consent option is provided. Based on the customer's consent, Huawei Cloud may send marketing information to customers via email, and provide corresponding mechanism to allow customers to refuse to receive such marketing information at any time.

HUAWEI CLOUD does not access personal data present in customer content data unless authorized by the customer, or in compliance with local applicable laws and regulations or binding orders from government agencies.

⁴<https://intl.huaweicloud.com/en-us/product/cvcs.html>



3.2.2. Purpose Limitation

The purpose limitation obligation states that the organization may only collect, use, or disclose personal data for purposes that a reasonable person would consider appropriate.

Customer Considerations:

Customers have full control over their content data, act as data controllers, and decide whether to use HUAWEI CLOUD services to collect or use personal data and for what purpose. Customers should ensure that personal data collection is based on legal, specific, and clear purposes, inform the data subject, and obtain the consent of the data subject. Customers should also ensure that data is processed for the purposes of which the data subject is informed. Customers should develop a corresponding control process and use the related services provided by HUAWEI CLOUD or self-developed capabilities, to ensure that personal data is processed only for appropriate purposes and within the scope of the data subject's consent. Through the database security service (DBSS)⁵ provided by HUAWEI CLOUD, customers can quickly identify personal data from within the massive amounts of data they own and perform corresponding data protection processing. Based on the identified data, customers can analyze whether the personal data that has been collected is necessary for business purposes, and whether the purpose of data collection has been notified to the data subject. If there are any instances of non-compliance, corrective measures can be taken in time to avoid illegal risks.

HUAWEI CLOUD Considerations:

After obtaining the customer's consent to collect personal data necessary to provide the service, HUAWEI CLOUD will only process the customer's personal data within the scope specified in the *Privacy Statement*. In the HUAWEI CLOUD product design phase, HUAWEI CLOUD will sort out all the personal data categories involved and conduct a Privacy Impact Assessment (PIA) to ensure that the personal data collected by HUAWEI CLOUD products does not exceed that is required to implement goals. In the operation and maintenance process, HUAWEI CLOUD will set different access rights to personal data based on staff roles, ensuring that staff can only access or use personal data necessary for their work.

HUAWEI CLOUD will not use or disclose customer content data unless authorized by the customer, or in compliance with local applicable laws and regulations or binding orders of government agencies.

⁵ <https://intl.huaweicloud.com/en-us/product/dbss.html>



3.2.3. Access and Correction

Individuals have the right to request access to their personal data and to correct personal data that is in the possession or under the control of the organization.

Customer Considerations:

Customers have full control over their content data. If personal data is contained within content data in HUAWEI CLOUD, customers should establish a relevant mechanism and use the functions provided by HUAWEI CLOUD products and services or self-developed capabilities, to respond to the data subjects' requests for personal data access and correction.

For content data stored in HUAWEI CLOUD, customers should directly respond to the data subjects' requests to exercise their right to access and correct their personal data. Customers can use HUAWEI CLOUD's various privacy protection services, such as the Log Tank Service (LTS)⁶, to keep records of the operation of personal data, and to protect their users' right to be informed.

HUAWEI CLOUD Considerations:

HUAWEI CLOUD allows customers to exercise their right to access and correct their personal data. HUAWEI CLOUD provides a dedicated channel to receive customer requests, and is equipped with a professional team to respond to customer requests for personal data and privacy protection. Upon receiving a request from a customer, the problem is handled and processing is completed within a specified time, with the result then given back to the customer. For more details related to request channels, please refer to HUAWEI CLOUD's *Privacy Statement*.

For customer content data, if customers have any questions about the access requirements of their data subjects when using the HUAWEI CLOUD products, they should contact the HUAWEI CLOUD customer service team. For details, please refer to HUAWEI CLOUD official website.

⁶<https://intl.huaweicloud.com/en-us/product/lts.html>



3.2.4. Accuracy

An organization shall make a reasonable effort to ensure that personal data collected by or on behalf of the organization is accurate and complete, if the personal data is likely to be used by the organization to make a decision that affects the individual to whom the personal data relates.

Customer Considerations:

Customers have full control over their content data. If customer content data in HUAWEI CLOUD contains personal data, customers can select the data integrity protection function provided by HUAWEI CLOUD products or services or self-developed capabilities. Customers can develop security and privacy protection policies to ensure the accuracy of personal data, such as using the access control service to set minimum permissions for personal data and assign permissions as needed, and using encryption technology to ensure integrity during data storage and transmission. Customers can guarantee the accuracy of their content data through various data security and privacy protection functions provided by HUAWEI CLOUD. For example, in the data storage phase, HUAWEI CLOUD provides data encryption (server encryption) in multiple services such as cloud hard disk, object storage, image service, and relational database, and uses high-intensity algorithms to encrypt stored data. The server encryption function integrates the Data Encryption Workshop (DEW) ⁷. Customers can use DEW to centrally manage the key lifecycle and ensure the integrity of the data storage process. In the data usage phase, customers can adopt the Identity and Access Management (IAM) ⁸ provided by HUAWEI CLOUD to take measures such as user management, identity authentication and fine-grained cloud resource access control to prevent unauthorized modifications to content data. During the data transmission phase, customers can ensure the integrity of the data transmission process through various encryption transmission mechanisms provided by HUAWEI CLOUD. For example, when a customer provides a website service through the Internet, HUAWEI CLOUD's certificate management service can be used to implement trusted authentication of the website and secure transmission based on the encryption protocol. For customer service hybrid cloud deployment and global deployment scenarios, customers can use Virtual Private Network (VPN) ⁹, Direct Connect (DC) ¹⁰, Cloud Connect (CC) ¹¹ and other services provided by HUAWEI CLOUD.

⁷ <https://intl.huaweicloud.com/en-us/product/dew.html>

⁸ <https://intl.huaweicloud.com/en-us/product/iam.html>

⁹ <https://intl.huaweicloud.com/en-us/product/vpn.html>

¹⁰ <https://intl.huaweicloud.com/en-us/product/dc.html>

¹¹ <https://intl.huaweicloud.com/en-us/product/cc.html>

***HUAWEI CLOUD Considerations:***

For customer personal data, HUAWEI CLOUD has taken various measures to ensure accuracy. For example, HUAWEI CLOUD checks the validity of data when customers input personal data, and enhances the standardization and accuracy of data input. HUAWEI CLOUD also requires the entry of a verification code obtained through the email address or mobile phone number provided by the customer, in order to confirm the customer identity and verify the accuracy of the relevant contact information. For customer content data, HUAWEI CLOUD provides customers with a variety of data security and privacy protection functions to help customers ensure the accuracy of their content data.

3.2.5. Protection

An organization shall protect personal data in its possession or under its control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

Customer Considerations:

Customers have full control over their content data. Customers should choose the right services and develop security and privacy protection policies to protect personal data. Customers should configure security according to business and privacy protection needs, such as operating system configuration, network settings, security protection, and database encryption policies, and set appropriate access control and password policies.

In addition, customers can satisfy various security requirements by utilizing security services provided by HUAWEI CLOUD. For more details, please refer to *HUAWEI CLOUD Security White Paper*¹² and *White Paper for HUAWEI CLOUD Data Security*¹³ released by HUAWEI CLOUD.

HUAWEI CLOUD Considerations:

For customer personal data, HUAWEI CLOUD guarantees the security of personal data through a series of technologies. For example, policies are implemented based on the minimum permissions required by roles through identity authentication and access control technologies, preventing unauthorized manipulation of personal data; encryption technologies are widely used to encrypt customer personal data, ensuring data security during storage and transmission; potential security risks are discovered in a timely manner in order to quickly respond to and address issues through logging and auditing technology.

For customer content data, HUAWEI CLOUD utilizes various data security technologies and related management and control measures, including identity authentication and access control, data transmission and storage encryption technologies, and logging, to ensure the security of HUAWEI CLOUD services.

¹² https://intl.huaweicloud.com/content/dam/cloudbu-site/archive/hk/en-us/securecenter/security_doc/SecurityWhitepaper_en.pdf

¹³ https://intl.huaweicloud.com/content/dam/cloudbu-site/archive/hk/en-us/securecenter/security_doc/DataSecurityWhitepaper_en.pdf



3.2.6. Retention Limitation

An organization shall cease to retain personal data, or remove the means by which the personal data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal data was collected is no longer being served by retention of the personal data and retention is no longer necessary for legal or business purposes.

Customer Considerations:

For customer content data containing personal data, only the customer can advise when it is necessary to retain the personal data for legal or business purposes. HUAWEI CLOUD does not access customer content data, nor can it know the original purpose for which it was collected.

Customers should develop appropriate data retention policies and use related services provided by HUAWEI CLOUD or self-developed capabilities to remove or anonymize personal data when it is no longer needed for legal or business purposes. Customers can desensitize sensitive personal data through related services provided by HUAWEI CLOUD, so that data can no longer identify individuals. For example, customers can use HUAWEI CLOUD Database Security Service (DBSS) to discover sensitive personal data stored in various databases, identify sensitive data according to specific rules, and hide sensitive personal data in real time according to desensitization strategies.

HUAWEI CLOUD Considerations:

For customer personal data, HUAWEI CLOUD adopts an automatic deletion mechanism. After a customer cancels their HUAWEI CLOUD account, their personal data is automatically deleted by the system.

For customer content data, when the customer actively performs data deletion or deletes the data due to the expiration of the service, HUAWEI CLOUD strictly adheres to the data destruction standard and the customer agreement to clear stored customer data and guarantee it is not recoverable.



3.2.7. Transfer Restriction

An organization shall not transfer any personal data to a country or territory outside Singapore except in accordance with requirements prescribed under the PDPA.

Customer Considerations:

When a customer purchases HUAWEI CLOUD products or services, they should choose the available area for storing content data and properly configure the virtual private cloud (VPC) policy according to the compliance requirements of their own services. If personal data is stored in HUAWEI CLOUD, the data subject should be informed of the area in which the personal data is stored. The definition of cross-border transfer of data between the customer and its individual users is the responsibility of the customer.

Customers can specify the area in which customer content is stored. HUAWEI CLOUD does not migrate customer content from selected areas without the customer's prior consent. In addition, customers can build a private network environment through the VPC service provided by HUAWEI CLOUD. The network area is divided by subnet planning and routing policy configuration, and the storage is placed in the internal subnet of the specified available area.

HUAWEI CLOUD Considerations:

HUAWEI CLOUD has established data centers in many countries around the world. Regardless of which country or region the data is stored in, HUAWEI CLOUD adopts a strict and unified data security strategy. For all personal data and stored customer content data, HUAWEI CLOUD can always ensure that the protection standards of personal data conform to PDPA, even if the data is migrated outside Singapore. HUAWEI CLOUD is certified by international authoritative organizations, confirming HUAWEI CLOUD's implementation of leading personal data protection measures. Further information about personal data protection can be found in *White Paper for HUAWEI CLOUD Privacy Protection*.

HUAWEI CLOUD unifies customer personal data stored in data centers within the same country or region, and does not transfer customer personal data to other countries or regions.



3.2.8. Openness

The openness obligation of PDPA mainly refers to an organization's need to formulate and implement policies and practices necessary for fulfilling PDPA obligations ("data protection policies and practices") and to be known to the public. The related requirements are collectively referred to as openness obligation in PDPA. Specific requirements for this obligation include the following: Employees should be aware of such policies and practices; organizations should establish a process to respond to complaints related to the PDPA, and channels for complaints should be known to the public; and organizations should have a dedicated person responsible for PDPA compliance and disclosure of relevant contact information.

Customer Considerations:

Customers collect personal data contained in customer content by themselves. If customers choose to use HUAWEI CLOUD service and store customer content containing personal data on HUAWEI CLOUD, customers have the responsibility to establish personal data protection policies and practices to ensure that they meet the requirements of PDPA and make the data subject aware.

Customers can obtain details about HUAWEI CLOUD's privacy protection through the information released by the HUAWEI CLOUD Trust Center. If necessary, customers can acquire HUAWEI CLOUD's third party audit report to understand HUAWEI CLOUD's internal management control.

HUAWEI CLOUD Considerations:

Huawei has formulated and implemented policies and regulations on personal data protection. HUAWEI CLOUD follows the same policies as Huawei, and has established a comprehensive privacy protection process system. Through a series of strict scientific processes, HUAWEI CLOUD ensures that business activities meet the requirements of privacy protection, including privacy process framework, protection policy, and privacy protection design norms. Huawei's personal data protection policies and regulations are available to every employee on Huawei's intranet. If there are any changes in policies, Huawei will notify employees to ensure that they are aware of and abide by relevant policies, and ensure the security of customer personal data from internal management.

HUAWEI CLOUD respects the privacy rights of users and provides a clear *Privacy Statement* on its official website to inform users about HUAWEI CLOUD's privacy policies and practices.

The Data Protection Officer (DPO) of Huawei Group is fully responsible for the privacy protection management of HUAWEI CLOUD. HUAWEI CLOUD has set up a professional cyber security and privacy protection team to implement privacy protection related activities. In addition, HUAWEI CLOUD is equipped with full-time legal and privacy protection staff in Singapore to ensure HUAWEI CLOUD satisfies applicable privacy laws and regulations in its various activities.

HUAWEI CLOUD is always receptive to customer feedback and eager to receive any queries or complaints, in addition to any privacy-related concerns that may arise. In addition, customers can also submit question or complaint related work orders through HUAWEI CLOUD's international site pages. HUAWEI CLOUD will deal with customer complaints in a timely manner according to the internal customer complaint processing process.



4. Conclusion

HUAWEI CLOUD always adheres to HUAWEI's "customer-centric" core values, fully understands the importance of customer personal data security, and respects and protects customer privacy rights. HUAWEI CLOUD has industry-leading security and privacy protection technologies and provides customers with capabilities through cloud services and solutions to help customers cope with increasingly complex and open network environments and increasingly strict privacy protection laws and regulations.

To satisfy the requirements of local privacy protection laws and regulations, HUAWEI CLOUD follows up on the updates of relevant laws and regulations, converting new requirements into internal HUAWEI CLOUD regulations, and optimizing internal processes to ensure that all activities carried out by HUAWEI CLOUD meet the requirements of laws and regulations. HUAWEI CLOUD continuously develops and launches privacy protection related services and solutions to help customers implement privacy protection laws and regulations in each region.

Compliance with privacy protection laws and regulations is a long-term and multi-disciplinary activity. HUAWEI CLOUD is committed to continuously improving capabilities in the future in order to satisfy relevant laws and regulations and to build a secure and trustworthy cloud platform for customers.

This white paper is for reference only and does not have legal effect or constitutes legal advice. Customers should assess their use of cloud services as appropriate and ensure compliance with Singapore's PDPA when using HUAWEI CLOUD.

5. Version History

Date	Version	Description
November 2019	1.0	First release