

# HUAWEI CLOUD Compliance with PDPA of Macao SAR China

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# 1 Overview

## 1.1 Scope of Application

The information provided in this document applies to HUAWEI CLOUD and all its products and services available in Macao Special Administrative Region of the People's Republic of China ("Macao SAR China").

## 1.2 Purpose of Publication

This document is intended to help customers understand:

- HUAWEI CLOUD's privacy protection responsibility model;
- Macao SAR China privacy laws and regulations;
- HUAWEI CLOUD's responsibilities on compliance with Macao SAR China privacy laws and regulations;
- HUAWEI CLOUD's controls and achievements in privacy management;
- Customers' responsibilities and obligations when falling under Macao SAR China privacy regulations jurisdiction, as specified in the responsibility model;
- How to leverage HUAWEI CLOUD's security products and services to achieve privacy compliance.

## 1.3 Basic Definitions

- **Personal Data**

Any information related to a natural person ("data subject") whose identity has been determined or can be determined, including audio and video, regardless of its nature and whether it possesses a carrier. The so-called identity-determinable person refers to a person whose identity can be determined directly or indirectly, especially by referring to an identification number or one or more physical, physiological, psychological, economic, cultural or social characteristics.

- **Personal Data Filing System ("filing system")**

Any structured set of personal data which are accessible according to specific criteria, regardless of the form or method of its establishment, storage and organization.

- **Data Subject**

The natural person whose data are processed.

- **Processing of Personal Data**

Any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

- **Controller**

The natural or legal person, public entity, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data.

- **Processor**

A natural or legal person, public entity, agency or any other body which processes personal data on behalf of the controller.

- **Third Party**

Any natural or legal person, public entity, agency or any other body other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or the processor, are authorized to process the data.

- **Recipient**

A natural or legal person, public entity, agency or any other body to whom data are disclosed, whether a third party or not; however, authorities which may receive data in the framework of a law or a provision of a regulation of an organic nature shall not be regarded as recipients.

- **The Data Subject's Consent**

Any freely given specific and informed indication of his wishes by which the data subject signifies his agreement to personal data relating to him being processed.

- **HUAWEI CLOUD**

HUAWEI CLOUD is the cloud service brand of the HUAWEI marquee, committed to providing stable, secure, reliable, and sustainable cloud services.

- **Customer**

Registered users having a business relationship with HUAWEI CLOUD.

- **Account Information**

Personal data, such as names, phone numbers, email addresses, bank accounts and billing information provided by customers to HUAWEI CLOUD when creating or managing their HUAWEI CLOUD accounts. HUAWEI CLOUD acts as the data controller of any personal data included within account information.

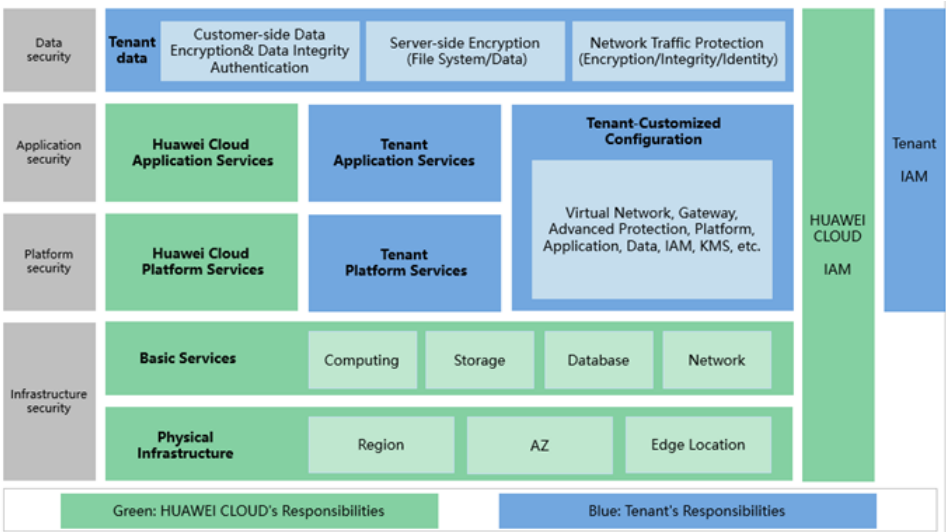
- **Content Data**

Data stored or processed during the use of HUAWEI CLOUD services, including but not limited to documents, software, images, and audio and video files.

# 2 Privacy Protection Responsibilities

Due to the complex cloud service business model, the security protection of personal data is not the sole responsibility of one single party, but requires the joint efforts of both the tenant and HUAWEI CLOUD. As a result, HUAWEI CLOUD proposes a responsibility sharing model to help tenants to understand the privacy protection responsibility scope for both parties and ensure the coverage of all areas of privacy protection. Below is an overview of the responsibilities distribution model between the tenant and HUAWEI CLOUD:

Figure 2-1 Responsibility Sharing Model



As shown in the above figure, the privacy protection responsibilities are distributed between HUAWEI CLOUD and tenants as below:

**HUAWEI CLOUD:** As the Cloud Service Provider (CSP), HUAWEI CLOUD is not only responsible for the security and compliance of personal data collected or processed during business operations, but also for the platform security defined by the security and compliance of HUAWEI CLOUD's infrastructure, including the cloud platform and software applications offered to tenants.

- **Protection of Tenant Privacy:** HUAWEI CLOUD identifies and protects tenants' personal data. HUAWEI CLOUD's policy, processes and operations not only resulted in the formulation of privacy protection policies but also in the deployment of active privacy control measures, such as anonymization, data encryption, system and platform security protections, all helping to ensure the security of tenants' personal data.

- **Platform and Tenant Security Support:** HUAWEI CLOUD is responsible for the security and compliance of the platform and infrastructure included in the cloud service, ensuring the platform and applications' security levels comply with the requirements of applicable privacy protection laws and regulations. At the same time, HUAWEI CLOUD provides tenants with a variety of privacy protection technologies and services in order to help tenants protect their privacy, such as access control, authentication, data encryption, logging and auditing functions, in order to help tenants protect their privacy according to their commercial requirements.

**Tenant:** As purchaser of HUAWEI CLOUD's products and services, tenants are free to decide on how to use them to store or process content data, which may include personal data. Therefore, tenants are responsible of Content Security, which is defined as the security and compliance of content data.

- **Content Data Protection:** Tenants should correctly and comprehensively identify personal data in the cloud, formulate policies to protect data security and privacy, and finally select appropriate privacy protection measures. Specific measures shall include security configuration based on business and privacy protection requirements, such as operating system configuration, network settings, security protection, database encryption, policy configuration and set appropriate access controls and password policies.
- **Respond to data subject requests:** Tenants shall guarantee the rights of data subjects and respond to their requests in a timely manner. In the case of a personal data breach, the tenant shall notify both regulatory authorities and data subjects, and take adequate actions in accordance with regulatory requirements.

# 3

## Macao SAR China Personal Data Protection Act (PDPA) Overview

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### 3.1 Macao SAR China PDPA Background

Based on the EU Directive 95/46/CE issued in 1995, Portugal promulgated the Personal Data Protection Law 68/98 in 1998. Macao SAR China started the legislative work on personal data protection in 2002. Based on Portugal's Personal Data Protection Law, combined with the local conditions of Macao SAR China, Macao Law 8/2005 was formed. The law stipulates the processing of personal data processed automatically (computer processing) and personal data processed non-automatically (manual processing). PDPA was promulgated on August 22, 2005, and comes into effect 180 days after its promulgation. This document is applicable to PDPA that has come into effect on the date of promulgation, and may be adjusted accordingly according to applicable laws and regulations.

### 3.2 HUAWEI CLOUD's Role under the PDPA

Personal data processed by HUAWEI CLOUD mainly includes customers' content data and Personal Data provided by customers when performing operations on HUAWEI CLOUD platform, including but not limited to registering, purchasing services, real-name authentication and service support. As customers have full control over their content data, when processing personal data included in content data, HUAWEI CLOUD is generally regarded as the data processor. HUAWEI CLOUD acts as the data controller when dealing with personal data provided by the customers' set up or management of their HUAWEI CLOUD account.

**HUAWEI CLOUD acts as the data controller of customers' personal data:** When a customer performs operations on HUAWEI CLOUD platform, including but not limited to registering, purchasing services, real-name authentication and service support, HUAWEI CLOUD will collect some personal data, such as the customer's name, address, ID number, bank accounts, and other types of information according to the service used. HUAWEI CLOUD is ultimately responsible for the security and privacy protection of such customers' personal data, ensuring that the collection, processing and storage procedures comply with legal requirements, responding to data subjects' requests, complying with the PDPA requirements regarding limited disclosure, and finally taking actions to avoid data breaches.

**HUAWEI CLOUD acts as the data processor of customer's content data:** When customers use HUAWEI CLOUD services or applications on behalf of a controller to process personal data included in their content, HUAWEI CLOUD is the data processor. HUAWEI



CLOUD processes personal data on behalf of customers in accordance with personal data processing requirements or instructions from the data controller, and maintains records of data processing operations.

# 4

## How HUAWEI CLOUD is Satisfying the Requirements of Macao SAR China PDPA

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### 4.1 HUAWEI CLOUD Privacy Commitment

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

HUAWEI CLOUD solemnly treats and actively assumes corresponding responsibilities to comply with global privacy protection laws and regulations. HUAWEI CLOUD not only has set up professional privacy protection teams, but also develops and optimizes processes and new technologies, and continuously builds up privacy protection capabilities to achieve its own privacy protection objectives: strictly safeguarding services' boundaries, protecting customers' personal data security, and helping customers implement privacy protections.

### 4.2 HUAWEI CLOUD Basic Privacy Protection Principles

- **Lawfulness, Fairness and Transparency**

HUAWEI CLOUD processes personal data of data subjects lawfully, fairly and in a transparent manner.

- **Purpose Limitation**

HUAWEI CLOUD collects personal data for specific, explicit and lawful 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 will be anonymized or pseudonymized to the extent possible to reduce the risks for data subjects.

- **Accuracy**

HUAWEI CLOUD ensures that personal data is accurate and, when necessary, kept up to date. Every reasonable step must be taken to ensure that inaccurate personal data is erased or rectified without delay depending on the purpose of data processing.

- **Storage Limitation**

Personal data will not be kept beyond the period necessary for the purposes of data processing.

- **Integrity and Confidentiality**

Taking into account the existing technical capabilities, implementation costs, 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, 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.

### 4.3 HUAWEI CLOUD’s Compliance Measures in Response to Macao SAR China PDPA

As data controller, HUAWEI CLOUD is responsible for protecting customers' personal data. Therefore, HUAWEI CLOUD has adopted privacy protection mechanism and technology to meet the compliance of PDPA's core requirements.

Core Requirements of PDPA	Specific Requirements Applicable to HUAWEI CLOUD (As Data Controller)	Measures Taken by HUAWEI CLOUD
Data quality	<p>HUAWEI CLOUD shall handle personal data in a lawful manner and in accordance with the principles of good faith and transparency.</p> <p>HUAWEI CLOUD should only collect personal data for purposes that are "specified, explicit, legitimate and necessary for the business".</p> <p>HUAWEI CLOUD shall only collect personal data for the above purposes to a minimum extent.</p> <p>HUAWEI CLOUD shall ensure the accuracy of personal data and correct or delete incomplete or inaccurate personal data in a timely manner.</p> <p>HUAWEI CLOUD shall ensure that personal data is not stored for longer than is necessary for the purposes for which they were collected.</p>	<p>HUAWEI CLOUD has published a series of white papers related to privacy on the cloud, privacy protection principles, privacy protection technologies, privacy protection concepts, privacy service recommendations and obtained privacy certifications, accessible in the <a href="#">Trust Center</a> where customers can review HUAWEI CLOUD's policies and practices regarding personal data.</p> <p>When registering to HUAWEI CLOUD, customers are presented with the “<a href="#">Privacy Statement</a>” requiring their consent. The privacy statement shows the type of personal data the data user holds and its use purpose.</p> <p>Introducing how HUAWEI CLOUD will collect and process customers' personal data, data subjects whether they must provide personal data, the consequences of</p>

Core Requirements of PDPA	Specific Requirements Applicable to HUAWEI CLOUD (As Data Controller)	Measures Taken by HUAWEI CLOUD
		<p>refusing to provide personal data, the purposes for which personal data are used, to whom the personal data are transferred, and the rights and ways to request access to and correction of personal data. Customers can also directly check HUAWEI CLOUD's "<a href="#">Privacy Statement</a>" on the official website.</p> <p>Additional privacy notices will be provided in the product agreement if the purchase or after-sales service of the related product involves the collection or use of personal data for purposes other than those originally stated in the privacy statement.</p> <p>When collecting personal data, HUAWEI CLOUD requires the entry of a verification obtained through the e-mail address or mobile phone to verify the data subject. In order to achieve the highest level of accuracy of the personal data as much as possible according to the data subjects' correction request, data subjects can apply for personal data correction through the following channels:</p> <ul style="list-style-type: none"> <li>• Sending an email to the address provided in the privacy statement;</li> <li>• Submitting a request through <a href="#">Data Subject Right Portal</a> on HUAWEI CLOUD official website;</li> <li>• Submitting a request through the service ticket page.</li> </ul> <p>HUAWEI CLOUD regularly reviews the collection, use and disclosure purposes of personal data, and anonymizes or deletes personal data that are no longer needed; Customers can also delete the data which is saved in HUAWEI CLOUD by cancelling their account on the official website.</p>

Core Requirements of PDPA	Specific Requirements Applicable to HUAWEI CLOUD (As Data Controller)	Measures Taken by HUAWEI CLOUD
Criteria for making data processing legitimate	<p>The legal basis for processing personal data by HUAWEI CLOUD is "obtaining consent from the data subject" or the following:</p> <p>the performance of the contract with the data subject, or the data subject expressly requested to be included in the contract prior to the conclusion of the contract;</p> <p>Necessary for the entity responsible for processing personal data to fulfil its statutory obligations.</p>	<p>When registering an account, the customer is provided with the privacy statement and is asked for his consent. If a service related to purchasing or after-sales involves the collection or the use of personal information for purposes other than those described in the privacy statement, an additional privacy statement shall be included within the related product agreement requiring data subjects' consent.</p> <p>HUAWEI CLOUD collects personal data only when necessary for providing services. The purpose and manner of collection principle includes: user consent, contract enforcement, legal compliance, protection of not only organizations' legitimate interests, but also data subjects and others' key benefits.</p>
Rights of the data subject	<p>The data subject has the right to information, the right of access, the right to rectify, the right to object, the right not to be subject to automated individual decisions and the right to compensation. HUAWEI CLOUD shall respond to data subject rights requests in accordance with PDPA requirements.</p> <p>When collecting personal data, HUAWEI CLOUD shall provide the data subject with the following information:</p> <p>the identity of the enterprise and its representative (if any);</p> <p>the purposes of the processing;</p> <p>If the recipients are involved, the information of the recipients or the categories of the recipients;</p> <p>Whether replies to the questions are obligatory or voluntary, as well as the possible consequences of failure to reply;</p> <p>Clearly inform the data subject of the right of access and the right to</p>	<p>When registering to HUAWEI CLOUD, customers are presented with the <b>"Privacy Statement"</b>. In the <b>"Privacy Statement"</b>, the data subject will be informed of the identity of the enterprise, the purpose of processing, the recipient information or category involved, the possible consequences of the data subject disagreeing with the above statement and the rights of the data subject.</p> <p>When the data subject proposes to exercise his rights, HUAWEI CLOUD provides customers with a variety of convenient channels to exercise the rights of the data subject, including:</p> <ul style="list-style-type: none"> <li>• Sending a request through the e-mail address indicated in the <b>"Privacy Statement"</b>;</li> <li>• Sending a request through <b>Data Subject Right Portal</b> of HUAWEI CLOUD official website;</li> <li>• Submitting a request through the</li> </ul>

Core Requirements of PDPA	Specific Requirements Applicable to HUAWEI CLOUD (As Data Controller)	Measures Taken by HUAWEI CLOUD
	rectify and the conditions under which these rights are exercised.	<p>service ticket page.</p> <p>HUAWEI CLOUD will respond and process the request immediately after verifying the identity of the requestor.</p>
Security and confidentiality of processing	<p>HUAWEI CLOUD must implement appropriate technical and organizational measures to ensure the security of personal data, and avoid data destruction, unauthorized alteration, disclosure or access.</p> <p>If HUAWEI CLOUD involves entrusting a processor to process personal data, it must choose a processor providing sufficient guarantees in respect of the technical security measures and organizational measures governing the processing to be carried out.</p> <p>HUAWEI CLOUD and all people who know the personal data they handle while performing their duties have the duty of professional confidentiality, even if the corresponding duties are terminated.</p>	<p>HUAWEI CLOUD has adopted strict administrative and technical controls to ensure personal data security in the access, transfer, storage, processing and other stages of personal data lifecycle.</p> <ul style="list-style-type: none"> <li>• In terms of authentication, strict password policy and multi-factor authentication are adopted;</li> <li>• In the aspect of permission management, role-based access control and permission management for operation and maintenance personnel is implemented;</li> <li>• In terms of data storage and transmission, sensitive data encryption is adopted;</li> <li>• In terms of data processing, monitoring and auditing of access to critical systems through logging and auditing of data processing is adopted.</li> </ul> <p>Customers can also verify the privacy and security controls within HUAWEI CLOUD's environment through <a href="#">HUAWEI CLOUD security reports or certifications</a> obtained.</p> <p>HUAWEI CLOUD has obtained multiple certifications from privacy compliance related international standard, including ISO 27701, ISO 29151, ISO 27018, BS 10012, SOC, privacy audit reports (please refer to Chapter 6 for a detailed introduction of certifications). Among all the international standards, ISO27018 is the international code of conduct focusing on the protection of</p>

Core Requirements of PDPA	Specific Requirements Applicable to HUAWEI CLOUD (As Data Controller)	Measures Taken by HUAWEI CLOUD
		<p>personal data regarding cloud, its adoption indicates that HUAWEI CLOUD has a complete personal data protection management system.</p> <p>When HUAWEI CLOUD selects a processor to process personal data, it will sign a personal data processing agreement with the processor, and continuously track and monitor the data processing process.</p> <p>In the confidentiality agreement signed between HUAWEI CLOUD and its employees, the confidentiality content and confidentiality period are stipulated, and even after the termination of their duties, they still have confidentiality obligations.</p>
<p>Transfer of personal data outside the MSAR</p>	<p>The principle of the transfer of personal data to a destination outside the MSAR is that the data can only be transferred to countries and regions where the local legal system can ensure an appropriate degree of protection.</p> <p>The Office for Personal Data Protection decides whether the legal system can ensure the "degree of protection". However, in the following scenarios, after notifying the Office for Personal Data Protection, personal data can be transferred to countries and regions where the local legal system can ensure an appropriate degree of protection:</p> <p>Transfer is necessary to execute the contract signed with the data parties;</p> <p>Transfer is necessary to execute the contract with the third party, and it is based on the interests of the data subject;</p> <p>Transfer is necessary to protect the</p>	<p>HUAWEI CLOUD will evaluate its products and services, and if it involves transferring personal data to places outside Macao SAR, HUAWEI CLOUD will implement the notification according to PDPA requirements.</p>

Core Requirements of PDPA	Specific Requirements Applicable to HUAWEI CLOUD (As Data Controller)	Measures Taken by HUAWEI CLOUD
	vital interests of data subjects.	
Notification	<p>If HUAWEI CLOUD has the following scenarios, it must notify the Office for Personal Data Protection in Macao SAR China in writing:</p> <p>Any wholly or partly automatic processing operation or set of such operations intended to serve a single purpose or several related purposes.</p> <p>Processing sensitive data for the purpose of protecting the important interests of the data subject, and the data subject is unable to give consent due to physical or legal reasons;</p> <p>When it comes to the cross-border transfer of personal data outside Macao SAR China.</p>	<p>HUWEI CLOUD will evaluate its products and services, and if the notification conditions are met, HUWEI CLOUD will implement the notification according to the PDPA requirements. As an entity responsible for handling personal data, HUWEI CLOUD will not process "sensitive data".</p>



# 5 How HUAWEI CLOUD Supports Customers to Comply with Macao SAR China PDPA

## 5.1 HUAWEI CLOUD's Compliance Measures in Response to Macao SAR China PDPA

When the customer is the data controller and HUAWEI CLOUD provides assistance in processing personal data in the customer's content data, the customer is likely to fall within the PDPA's jurisdiction. If so, customers should meet the PDPA compliance requirements, and HUAWEI CLOUD will provide compliance support to customers in the following areas.

Core Requirements of PDPA	Specific Requirements Applicable to Customer (As Data Controller)	Service Support Provided by HUAWEI CLOUD for Customers (As Data Processor)
Data quality	<p>Customer shall handle personal data in a lawful manner and in accordance with the principles of good faith and transparency.</p> <p>Customer should only collect personal data for purposes that are "specified, explicit, legitimate and necessary for the business".</p> <p>Customer shall only collect personal data for the above purposes to a minimum extent.</p> <p>Customer shall ensure the accuracy of personal data and correct or delete incomplete or inaccurate personal data in a timely manner.</p> <p>Customer shall ensure that personal data is not stored for longer than is necessary for the purposes for which they were collected.</p>	<p>As a data processor, HUAWEI CLOUD only follows the customer's instructions regarding data processing. The purpose and scope of content data collection are managed by the customer.</p> <p>Some of HUAWEI CLOUD products and services provide customers with interfaces to embed privacy statements and functions to record operations related to the data subject giving his content. In the privacy statement, the customer can inform the data subject of the type, use purpose, preservation period and other information of the personal data to be collected.</p> <p>Data deletion function is provided in most HUAWEI CLOUD products or services enabling customers to delete content data.</p>

Core Requirements of PDPA	Specific Requirements Applicable to Customer (As Data Controller)	Service Support Provided by HUAWEI CLOUD for Customers (As Data Processor)
Criteria for making data processing legitimate	<p>The legal basis for processing personal data by HUAWEI CLOUD is "obtaining consent from the data subject" or the following:</p> <ul style="list-style-type: none"> <li>the performance of the contract with the data subject, or the data subject expressly requested to be included in the contract prior to the conclusion of the contract;</li> <li>Necessary for the entity responsible for processing personal data to fulfil its statutory obligations.</li> </ul>	<p>Some of HUAWEI CLOUD's products and services provide functions or capabilities that better fulfill the requirements of privacy protection laws on informing data subjects. For example, customers can use HUAWEI CLOUD's interface to upload their privacy policy.</p> <p>It is suggested that customers clearly state the purpose of personal data processing and the legal basis for satisfaction in the privacy statement. HUAWEI CLOUD can provide customers with the ability to record the operation related to the data subject giving his content.</p>
The Processing of Sensitive Data	<p>Except for the following scenarios, customer is not allowed to process sensitive personal data. Scenarios where sensitive data can be processed include:</p> <ul style="list-style-type: none"> <li>The processing of sensitive data is given explicit authorization by a legal provision or by a provision of a regulation of an organic nature;</li> <li>On important public interest grounds, such processing is essential for exercising the legal or statutory rights of the controller, and authorized by the Office for Personal Data Protection;</li> <li>The data subject has given his explicit consent for such processing;</li> <li>It is necessary to protect the vital interests of the data subject or of another person, and the data subject is physically or legally incapable of giving his consent;</li> <li>It is carried out with the data subject's consent in the course of its legitimate activities by a legal person or non-profit seeking body with a political,</li> </ul>	<p>It is recommended that customers communicate with the Office for Personal Data Protection in Macao SAR China before collecting sensitive data, to ensure compliance with the sensitive data processing requirements of the PDPA.</p>

Core Requirements of PDPA	Specific Requirements Applicable to Customer (As Data Controller)	Service Support Provided by HUAWEI CLOUD for Customers (As Data Processor)
	<p>philosophical, religious or trade-union aim and on condition that the processing relates solely to the members of the body or to persons who have regular contact with it in connection with its purposes and that the data are not disclosed to a third party without the consent of the data subjects;</p> <ul style="list-style-type: none"> <li>It relates to sensitive data which are manifestly made public by the data subject, provided his consent for their processing can be clearly inferred from his declarations.</li> </ul>	
Rights of the data subject	<p>The data subject has the right to information, the right of access, the right to rectify, the right to object, the right not to be subject to automated individual decisions and the right to compensation. customer shall respond to data subject rights requests in accordance with PDPA requirements.</p> <p>When collecting personal data, customer shall provide the data subject with the following information:</p> <ul style="list-style-type: none"> <li>the identity of the enterprise and its representative (if any);</li> <li>the purposes of the processing;</li> <li>If the recipients are involved, the information of the recipients or the categories of the recipients;</li> <li>Whether replies to the questions are obligatory or voluntary, as well as the possible consequences of failure to reply;</li> <li>Clearly inform the data subject of the right of access and the right to rectify and the conditions under which these rights are exercised.</li> </ul>	<p>HUAWEI CLOUD has a dedicated team to ensure communication with customers.</p> <p>Customers can seek assistance from HUAWEI CLOUD through the service ticket page or the <a href="#">Data Subject Right Portal</a> on HUAWEI CLOUD official website.</p>
Security and confidentiality	Customer must implement appropriate technical and	HUAWEI CLOUD provides access control, network isolation and other

Core Requirements of PDPA	Specific Requirements Applicable to Customer (As Data Controller)	Service Support Provided by HUAWEI CLOUD for Customers (As Data Processor)
y of processing	<p>organizational measures to ensure the security of personal data, and avoid data destruction, unauthorized alteration, disclosure or access.</p> <p>If customer involves entrusting a processor to process personal data, it must choose a processor providing sufficient guarantees in respect of the technical security measures and organizational measures governing the processing to be carried out.</p> <p>Customer and all people who know the personal data they handle while performing their duties have the duty of professional confidentiality, even if the corresponding duties are terminated.</p>	<p>security configuration. HUAWEI CLOUD provides specialized security products to help customers improve their security capabilities in certain domains, such as Database Security Service, Advanced Anti-DDoS, Vulnerability Scan Service, etc.</p> <p>HUAWEI CLOUD has obtained multiple certification in relation to privacy compliance international standard (Detailed certification is described in Chapter 6), to prove that HUAWEI CLOUD has enough safeguard measures in terms of technical capability and organizational capability of data processing.</p> <p>In the confidentiality agreement signed between HUAWEI CLOUD and its employees, the confidentiality content and confidentiality period are stipulated, and even after the termination of their duties, they still have confidentiality obligations.</p>
Transfer of personal data outside the MSAR	<p>TSOC 2 Type I the principle of the transfer of personal data to a destination outside the MSAR is that the data can only be transferred to countries and regions where the local legal system can ensure an appropriate degree of protection.</p> <p>The Office for Personal Data Protection decides whether the legal system can ensure the "degree of protection". However, in the following scenarios, after notifying the Office for Personal Data Protection, personal data can be transferred to countries and regions where the local legal system can ensure an appropriate degree of protection:</p> <ul style="list-style-type: none"> <li>• Transfer is necessary to execute the contract signed with the data parties;</li> <li>• Transfer is necessary to execute the contract with the third party,</li> </ul>	<p>HUAWEI CLOUD will evaluate its products and services, and if it involves transferring personal data to places outside Macao SAR, HUAWEI CLOUD will implement the notification according to PDPA requirements.</p>

Core Requirements of PDPA	Specific Requirements Applicable to Customer (As Data Controller)	Service Support Provided by HUAWEI CLOUD for Customers (As Data Processor)
	and it is based on the interests of the data subject; <ul style="list-style-type: none"><li>Transfer is necessary to protect the vital interests of data subjects.</li></ul>	
Notification	If customer has the following scenarios, it must notify the Office for Personal Data Protection in Macao SAR China in writing: <ul style="list-style-type: none"><li>Any wholly or partly automatic processing operation or set of such operations intended to serve a single purpose or several related purposes.</li><li>Processing sensitive data for the purpose of protecting the important interests of the data subject, and the data subject is unable to give consent due to physical or legal reasons;</li><li>When it comes to the cross-border transfer of personal data outside Macao SAR China.</li></ul>	Customers are advised to evaluate their products and services and, if the conditions of the notification are met, to execute the notification in accordance with the PDPA requirements.

## 5.2 How HUAWEI CLOUD Products and Services Help Customers Implementing Content Data Privacy and Security

HUAWEI CLOUD has a deep understanding of the importance of customers' privacy protection needs, combining it with its own privacy protection practices and technical capabilities in order to help customers to achieve compliance with the PDPA leveraging HUAWEI CLOUD products and services. HUAWEI CLOUD provides customers with a large range of products and services such as networking products, database products, security products, solutions for management and deployment as well as other products. Data protection, data deletion, network isolation, rights management and other functions implemented in HUAWEI CLOUD products can help customers implement privacy and security of content data.

- Management and Deployment Products**

Product	Description	Corresponding Core Requirements and Control Measures
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Product	Description	Corresponding Core Requirements and Control Measures
<b>Identity and Access Management (IAM)</b>	<p>Identity and Access Management (IAM) provides identity authentication and permissions management. With IAM, customers can create users for employees, applications, or systems in their organization, and control the users' permissions on owned resources.</p> <p>Through IAM, customers can perform user management, identity authentication, and fine-grained resource access control on the cloud to prevent unauthorized modification of content data.</p>	<p>PDPA (Article 15, 16, 17)- Security and confidentiality of processing</p> <p>PDPA (Article 10, 11, 12, 13, 14)- Rights of the data subject</p>
<b>Cloud Eye Service (CES)</b>	<p>Providing customers with a multidimensional monitoring platform for elastic cloud servers, bandwidth and other resources.</p> <p>Through Cloud Eye, customers can have a comprehensive understanding of HUAWEI CLOUD resources usage and business operations status, and respond to alarms in time to ensure business continuity.</p>	<p>PDPA (Article 15, 16, 17)- Security and confidentiality of processing</p>
<b>RDS for MySQL (RDS)</b>	<p>RDS for MySQL is a reliable and scalable cloud database service. Customers can deploy databases within minutes and stay focused on application development.</p> <ul style="list-style-type: none"> <li>Customers can achieve fully managed software and hardware deployment, installing patches, automated backup, monitoring metrics, fast scalability, restore backup data and other functions through RDS, and ensure zero data loss in the case of high business load.</li> </ul>	<p>PDPA (Article 15, 16, 17)- Security and confidentiality of processing</p>
<b>Elastic Cloud Server (ECS)</b>	<p>Elastic Cloud Server (ECS) provides secure, scalable, on-demand computing resources, enabling customers to flexibly deploy applications and workloads.</p> <ul style="list-style-type: none"> <li>Through ECS, customers can realize multiple dimensions of security services such as Web</li> </ul>	<p>PDPA (Article 15, 16, 17)- Security and confidentiality of processing</p>

Product	Description	Corresponding Core Requirements and Control Measures
	application firewall and vulnerability scanning, realize security assessment of their own cloud environment, realize intelligent process management based on customizable whitelist mechanism, and realize a number of scanning services such as general Web vulnerability detection and third-party application vulnerability detection.	

• **Security Products**

Product	Description	Corresponding Core Requirements and Control Measures
<b>Database Security Service (DBSS)</b>	Database Security Service (DBSS) uses machine learning mechanism and big data technologies to protect customers' databases on the cloud, audit and detect risky behaviors, such as SQL injection, operational risks identification, etc.  Customers can use DBSS to detect potential risks and ensure the security of their databases.	PDPA (Article 15, 16, 17)- Security and confidentiality of processing
<b>Data Encryption Workshop (DEW)</b>	Data Encryption Workshop (DEW) is a full-stack data encryption service. It covers Key Management Service (KMS), Key Pair Service (KPS), and Dedicated HSM. With DEW, customers can develop customized encryption applications, and integrate it with other HUAWEI CLOUD services to meet the most demanding encryption scenarios.  Customers can also use the service to develop their own encryption applications.  Customers can use DEW for centralized key lifecycle management to ensure the integrity of data storage procedures.	PDPA (Article 15, 16, 17)- Security and confidentiality of processing

Product	Description	Corresponding Core Requirements and Control Measures
<b>Web Application Firewall(WAF)</b>	<p>Web Application Firewall (WAF) can conduct multi-dimensional detection and protection of website traffic, combining with deep machine learning to identify malicious requests, protect against unknown threats, and block common attacks such as SQL injection or cross-site scripting.</p> <p>Customers can use WAF to protect their websites or servers from external attacks that affect the availability, security, or unwanted additional resources consumption of their web applications, reducing the risk of data tampering and theft.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing
<b>Vulnerability Scan Service (VSS)</b>	<p>Vulnerability Scan Service (VSS) is a multi-dimensional security detection service, with five core functions: web vulnerability scanning, asset content compliance detection, configuration baseline scanning, operating system vulnerability scanning, and identification of systems with a weak password.</p> <p>VSS enables customers to protect their data integrity by automatically identifying security threats on their exposed websites or servers.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing
<b>Advanced Anti-DDoS (AAD)</b>	<p>Advanced Anti-DDoS (AAD) is a value-added security defense service that defends against large volumetric DDoS attacks on Internet servers.</p> <p>Customers can configure AAD to divert the attack traffic to high-defense IP addresses with significant defense capabilities for scrubbing, keeping customers' business stable and reliable.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing

- **Network Products**



Product	Description	Corresponding Core Requirements and Control Measures
<b>Virtual Private Network (VPN)</b>	<p>Virtual Private Network (VPN) establishes a flexible, scalable IPsec encrypted communication channel between customers' local data center and their VPC on HUAWEI CLOUD.</p> <p>Customers can build a flexible and scalable hybrid cloud computing environment, and improve their security posture with encryption of the communication channel.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing
<b>Virtual Private Cloud (VPC)</b>	<p>Virtual Private Cloud (VPC) enables customers to create private, isolated virtual networks on HUAWEI CLOUD. Customers can configure IP address ranges, subnets, and security groups, assign Elastic IP (EIP) addresses, and allocate bandwidth in a VPC.</p> <p>VPC is the customer's private network on the cloud, with 100% isolation from other customers, enhancing the data security on the cloud.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing
<b>API Gateway (APIG)</b>	<p>API Gateway is a high-performance, high-availability, and high-security hosting service that helps customers build, manage, and deploy APIs at any scale.</p> <p>Customers can protect API through identity authentication and permission control provided by APIG and implement flexible and quota management and throttling user requests to protect backend services, flexible and secure open service capabilities.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing

- **Storage Products**

Product	Description	Corresponding Core Requirements and Control Measures
<b>Volume Backup</b>	Volume Backup Service (VBS) creates online permanent	PDPA (Article 15, 16, 17)- Security and confidentiality of processing

Product	Description	Corresponding Core Requirements and Control Measures
<b>Service (VBS)</b>	<p>incremental backup for cloud hard disk, automatically encrypts the backup disk data, and can restore the data to any backup point to enhance data availability.</p> <p>VBS can reduce the possibility of virus attack, human error deletion as well as hardware or software failure, protect data security and reliability, and reduce the risk of data tampering.</p>	
<b>Cloud Server Backup Service (CSBS)</b>	<p>Cloud Server Backup Service (CSBS) can simultaneously create a consistent online backup of multiple cloud drives within the cloud server.</p> <p>CSBS can reduce the possibility of virus attack, human error deletion as well as hardware or software failure, protect data security and reliability, and reduce the risk of data tampering.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing
<b>Object Storage Service (OBS)</b>	<p>Object Storage Service (OBS) provides stable, secure, efficient, and easy-to-use cloud storage service that lets customers store virtually any volume of unstructured data in any format and access it from anywhere using REST APIs.</p> <p>Customers can upload data through OBS encryption, authenticate the identity of users, and combine various methods and technologies to ensure the security of data transfer and access, and enable authentication protection for sensitive operations.</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing
<b>Elastic Volume Service (EVS)</b>	<p>Elastic Volume Service (EVS) provides persistent block storage, with advanced data redundancy and cache acceleration capabilities, EVS offers high availability and durability with an extremely low latency.</p> <p>Customers can use EVS encryption system disk and data disk, and the application of non-sensing, secure</p>	PDPA (Article 15, 16, 17)- Security and confidentiality of processing

Product	Description	Corresponding Core Requirements and Control Measures
	and convenient, can use the distributed multi-copy technology, to ensure that any copy of the failure of rapid data migration and restoration, to avoid a single hardware failure caused by data loss.	

# 6 HUAWEI CLOUD Privacy Protection Related Certifications

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HUAWEI CLOUD complies with all applicable privacy laws and regulations in the place where it operates. HUAWEI CLOUD has a professional legal team to closely monitor the update of laws and regulations, continuously track and analyze global laws and regulations, and ensure compliance with applicable laws and regulations. HUAWEI CLOUD's capabilities and achievements in privacy protection and personal data security have been widely recognized worldwide by third-party certifications. Up to now, HUAWEI CLOUD has obtained more than 20 certifications from more than ten organizations inside and outside China, including regional certifications on data security and global standard certifications related to privacy and data security.

## **Privacy Related Standard Certifications:**

- **ISO 27701**

Privacy information management system certification. The ISO 27701 certification shows that HUAWEI CLOUD has established a solid management system related to data privacy protection.

- **ISO 29151**

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 27018**

International code of conduct focused on the protection of personal data in Cloud. The adoption of ISO 27018 indicates that HUAWEI CLOUD has met the requirements of an internationally recognized personal data protection measures of public cloud platform, and can guarantee the security of customers' personal data.

- **BS 10012**

Personal information data management system standard issued by the British Standards Institute (BSI). The BS 10012 certification indicates that HUAWEI CLOUD offers a complete personal data protection system to ensure personal data security.

- **SOC Audit**

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 SOC 1 Type II、SOC 2 Type II and released SOC 3 report.

**Data Security Standard Certifications:**

- ISO 27001 Information Security Management System Certification
- ISO 27017 Cloud Service Information Security Management System
- ISO 20000 Information Technology Service Management System Certification
- ISO 22301 Business Continuity Management System
- CSA STAR Cloud Security International Gold Certification
- PCI DSS Third-Party Payment Industry Data Security Standard Certification
- International Common Criteria (CC) EAL3+ Security Assessment Standard
- PCI 3DS supports the security standards implemented by 3DS
- TISAX (Trusted Information Security Assessment Exchange)

**Regional Security Certifications:**

- Multi-Tier Cloud Security (MTCS) Level3 (Singapore)
- Association of Banks in Singapore (ABS) Outsourced Service Provider's Audit Report (OSPAR) (Singapore)
- Certification for the Capability of Protecting Cloud Service User Data (China)
- Trusted Cloud Service (China)
- Classified Cybersecurity Protection of China's Ministry of Public Security (China)
- Gold Operations and Management certification (China)
- Cloud Service Security Certification by Cyberspace Administration of China (China)
- ITSS Cloud Computing Service Capability Evaluation by the Ministry of Industry and Information Technology (China).

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# 7 Conclusion

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HUAWEI CLOUD always adheres to HUAWEI's "customer-centric" core values, fully understands the importance of customer personal 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 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 any legal effect or constitutes a legal advice. Customers should assess their use of cloud services as appropriate and ensure compliance with the PDPA of Macao SAR China when using HUAWEI CLOUD.

# 8 Version History

Date	Version	Description
2024-8	1.2	Routine update
2022-4	1.1	Routine update
2021-6	1.0	First release