



DPSB/RM/2024/03

Circular

13 September 2024

**Recent publication from the Privacy Commissioner for Personal Data:
the Code of Practice on the Identity Card Number and Other Personal
Identifiers: Compliance Guide for Data Users
(For Category B Registrant)**

According to [the Code of Practice on the Identity Card Number and Other Personal Identifiers](#) (the "Code")¹ revised by the Privacy Commissioner for Personal Data ("PCPD"), Hong Kong in April 2016, certain provisions have been incorporated to **permit** the collection of copies of ID cards in order to –

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3.2.2.1 provide proof of compliance with any statutory requirement on the part of the data user;
3.2.2.2 comply with a requirement to collect such copy as contained in any codes, rules, regulations or guidelines applicable to the data user issued by a regulatory or professional body, which requirement has been endorsed in writing by the Commissioner as being in accordance with Data Protection Principle 1 of the Ordinance.....

Your attention is drawn to PCPD's recent publication of [the Code: Compliance Guide for Data Users](#)² and the leaflet ["Your Identity Card Number and Your Privacy"](#)³ in which Q8 is reproduced hereunder –

Q8: *Can banks, insurance companies or estate agencies collect a copy of my HKID Card before I engage their service?*

A: *Yes, banks, insurance companies and Designated Non-Financial Businesses and Professions, including but not limited to accounting professionals, estate agencies, legal professionals, trust and company service providers, and category B precious metal & stone registrants, are required to collect a copy of your HKID Card as proof that they have carried out the customer due diligence measures as stipulated under sections 2 and 3 of Schedule 2 to the Anti-Money Laundering and Counter-Terrorist Financing Ordinance. However, the word "copy" should be marked on the copy of your HKID Card.*

Category B registrants are therefore reminded to ensure compliance with the relevant requirements of *the Code* when carrying out the customer due diligence and record-keeping measures as required by the Anti-Money Laundering and Counter-Terrorist Financing Ordinance, Cap. 615.

Should you have any queries, please contact us at 5972 6086.

**Dealers in Precious Metals and Stones Supervision Bureau
Customs and Excise Department**

¹ the Code of Practice on the Identity Card Number and Other Personal Identifiers
https://www.pcpd.org.hk/english/data_privacy_law/code_of_practices/files/picode_en.pdf

² the Code of Practice on the Identity Card Number and Other Personal Identifiers: Compliance Guide for Data Users
https://www.pcpd.org.hk/english/data_privacy_law/code_of_practices/files/compliance_guide_e.pdf

³ the leaflet "Your Identity Card Number and Your Privacy"
https://www.pcpd.org.hk/english/data_privacy_law/code_of_practices/files/ID_Leaflet_e.pdf