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BY EMAIL to clerk@japarliament.gov.jm

28 January 2021

Clerk to the Houses
Gordon House
81 Duke Street
Kingston

Dear Sirs,

Re: National Identification and Registration Act (NIDS Act)

Cable & Wireless Jamaica Limited and Columbus Communications Jamaica Limited (jointly referred to as Flow) have reviewed the NIDS Act in relation to the use of the National Identification Card and the relevant national identification number as a valid means of identification for the sale of our goods and services in store or via e-commerce, and as a credit information provider in accordance with the Credit Reporting Act.

Flow is governed by the provisions of the Credit Reporting Act (CRA), which requires that a data subject's confidential biographic information is collected at the point of sale, and such information is also collected and stored by the National Identification and Registration Authority pursuant to Section 11 of the NIDS Act. These two statutes along with the Data Protection Act are therefore inextricably linked. However, reference to the CRA has not been included in the supporting statutes of conformity for the Board's operations.

C&WJ therefore proposes the following amendments to the NIDS Act.

1. Clause 6 (1)(b) – Board of Management

Insert the Credit Reporting Act as a part of the Board's oversight given the interrelationship between NIDS and the collection and verification of identity for credit reporting.

ensure that the operations of the Authority are in conformity with—

(i) the Data Protection Act;

(ii) the Financial Administration and Audit Act and all applicable financial instructions issued by the Financial Secretary under that Act;

FLOW

 C&W Business

 C&W Networks

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- (iii) the Public Bodies Management and Accountability Act;*
- (iv) the Credit Reporting Act and*
- (v) any other law relevant to the management of public bodies or the protection of identity information;*

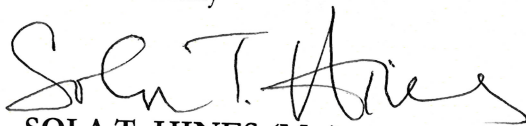
2. Clause 25 (3) Requests for Information or for Authentication and Verification Services.

A person may apply to be an accredited third party for the purposes of this section, in such form and manner as may be prescribed.

This clause remains vague as to the criteria required to be an accredited third party. Flow engages credit bureau services for authentication of customer identity and hence a more definitive insertion would be useful.

We thank you for the opportunity to engage on the NIDS Act and look forward to the insertion of the above for the continued efficient operation of our business.

Yours faithfully



SOLA T. HINES (Ms.)
Director of Legal Affairs, Caribbean



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