SmartSuite

Framework / Privacy / Global Privacy Regulations

Hong Kong PDPO (Personal Data (Privacy) Ordinance, Cap. 486)

The Hong Kong Personal Data (Privacy) Ordinance (PDPO) is a law governing collection, use, and protection of personal data.

PDPO

What it is

The Hong Kong Personal Data (Privacy) Ordinance (PDPO) is a data protection law that establishes requirements for the collection, handling, and use of personal data to safeguard individuals' privacy rights in Hong Kong. The PDPO aims to protect personal data against misuse, ensuring both public and private organizations uphold fundamental privacy standards and accountability.

Enacted and enforced by the Privacy Commissioner for Personal Data (PCPD) of Hong Kong, the PDPO applies to organizations, service providers, and government bodies that manage personal data within Hong Kong or process data originating from Hong Kong residents. The ordinance covers key areas such as data collection, use, security measures, data access and correction rights, cross-border data transfers, and breach notification requirements.

At a glance

PUBLISHER Office of the Privacy Commissioner for Personal Data (PCPD)	TYPE Framework	VERSION 2021
EFFECTIVE 20 December 1996	DOMAIN Privacy	FAMILY Global Privacy Regulations
REGION Hong Kong	ADOPTION MODEL Regulatory Compliance	IMPLEMENTATION COMPLEXITY Moderate

Source: https://www.pcpd.org.hk/english/data_privacy_law/ordinance_at_a_Glance/ordinance.html

Why it matters

- **Strengthen data protection practices** Enhance safeguards for personal data, minimizing the risk of unauthorized access, misuse, or loss within organizational systems.
- **Improve regulatory compliance** Support adherence to legal obligations, reducing the likelihood of fines, enforcement actions, and reputational damage related to privacy breaches.
- **Enable audit readiness** Facilitate structured processes and documentation that support efficient audits and demonstrate compliance with privacy requirements.
- **Enhance stakeholder trust** Promote transparent data practices that reinforce customer and stakeholder confidence in how their information is handled and protected.

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How SmartSuite supports HK PDPO (Cap. 486)

Personal Data Inventory and Classification

Maintain records of personal data types, purposes, and processing activities.

Privacy Governance and Policy Management

Centralize privacy policies, notices, and governance aligned to PDPO data protection principles.

Consent and Data Use Management

Track consent, purpose limitation, and lawful use of personal data.

Access and Correction Request Management

Manage access and correction requests with tracking, approvals, and audit trails.

Breach Management and Incident Workflows

Track data incidents and manage notification and response procedures.

PDPO Compliance Monitoring and Privacy Reporting

Provide dashboards showing privacy posture, control coverage, and PDPO compliance readiness.

Common framework mappings

APEC PF | GDPR | ISO 27001:2022 | ISO 27701 | APPI | NIST Privacy Framework v1.0 | PIPEDA | Singapore PDPA

Official resources

Hong Kong Personal Data (Privacy) Ordinance (PDPO)

Provides the full legal text of the data protection law in Hong Kong.

pcpd.org.hk/english/data_privacy_law/ordinance_at_a_Glance/ordinance.html

Guidance on Data Protection Principles

Outlines practical guidance for complying with PDPO data protection principles.

pcpd.org.hk/english/data_privacy_law/ordinance_at_a_Glance/ordinance.html

Guidance on Data Breach Handling and Notification

Describes procedures and responsibilities in the event of a data breach.

pcpd.org.hk/english/resources_centre/publications/files/DataBreachHandling2015_e.pdf

Guidance for Data Users on the Collection and Use of Personal Data

Defines practices for safe data collection and usage to protect individuals' privacy.

pcpd.org.hk/english/resources_centre/publications/guidance/guidance.html

Frequently asked questions

What is the Hong Kong Personal Data (Privacy) Ordinance (PDPO) used for?

The PDPO is designed to regulate the collection, handling, and use of personal data in Hong Kong, protecting individuals' privacy rights. It helps ensure that organizations implement standardized controls to prevent misuse of personal data and promotes accountability and transparency in personal data processing.

Is compliance with the PDPO mandatory for organizations in Hong Kong?

Yes, compliance with the PDPO is mandatory for both public and private sector organizations, service providers, and government bodies that manage or process personal data within, or originating from, Hong Kong. Non-compliance may result in regulatory enforcement, penalties, and reputational harm.

Who does the PDPO apply to?

The PDPO applies to any organization or individual ("data user") that controls the collection, holding, processing, or use of personal data in or from Hong Kong. This includes businesses, non-profits, and government organizations handling data relating to Hong Kong residents.

What are the key requirements or principles under the PDPO?

The PDPO is structured around six Data Protection Principles (DPPs), which cover fair data collection, data accuracy, purpose limitation, data security, transparency, and individuals' access and correction rights. Organizations must also have mechanisms for data breach notifications and designate a responsible data protection officer.

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How do organizations implement the PDPO in practice?

Organizations implement the PDPO by developing privacy management programs, conducting regular risk and privacy impact assessments, enforcing user access controls, and integrating explicit consent mechanisms. Documenting policies, training staff, and reviewing compliance practices are essential operational steps.

How does the PDPO relate to other privacy laws or frameworks?

The PDPO is Hong Kong-specific but has principles similar to international laws such as the EU GDPR and Singapore's PDPA. Organizations operating across jurisdictions should assess overlaps and gaps to ensure comprehensive privacy compliance.

What are the ongoing compliance requirements under the PDPO?

Ongoing PDPO compliance involves regular risk assessments, updating privacy policies, continuous monitoring of data handling activities, and periodic staff training. Organizations must also monitor regulatory updates from the PCPD and maintain effective incident and breach response processes.

How would SmartSuite support Hong Kong Personal Data (Privacy) Ordinance (PDPO)?

SmartSuite enables organizations to operationalize PDPO compliance through integrated control libraries aligned with the ordinance, risk registers to track privacy-related exposures, and policy management modules. The platform supports continuous evidence collection, automated compliance tracking, remediation workflows, and real-time dashboards for audit readiness and reporting, ensuring sustainable PDPO compliance.

License included / downloadable: Yes The Hong Kong Personal Data (Privacy) Ordinance is published by the Privacy Commissioner for Personal Data and is publicly available on the PCPD website. License included with platform

Full framework page and mappings: smartsuite.com/frameworks/hong-kong-personal-data-privacy-ordinance-pdpo-cap-486