

Wrongful Disclosure of Personal Data Through Sample Forms **by an Airline Company** **Investigation Findings**

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Background

The Office of the Privacy Commissioner for Personal Data (PCPD) has completed its investigation into a case relating to the wrongful disclosure of personal data through sample forms by an airline company.

The investigation arose from a complaint received by the PCPD in which a passenger (the Complainant) alleged that the personal data of two passengers and two related persons were disclosed to him through sample forms attached to an email sent by a ground service agent of the relevant airline company stationed in Phu Quoc in Vietnam.

The Complainant claimed compensation from the relevant airline company for delayed baggage regarding the flight that he took from Hong Kong to Vietnam in March 2025. The Complainant received an email on 11 April 2025 from its ground service agent at the outport in Phu Quoc in Vietnam (the Ground Service Agent) asking him to complete the required forms for the settlement of his compensation claim. Two sample forms (the Sample Forms) were attached in the email for the Complainant to make reference to and the Complainant discovered that the Sample Forms contained the personal data of two passengers and two related persons, which included their names, flight details and/or bank account details.

Upon being notified of the incident by the Complainant, the airline company reached out to the Ground Service Agent the next day to instruct it to stop sharing and attaching any personal data of passengers at once. The Ground Service Agent subsequently conducted briefing and enhanced training sessions to notify its staff members that the incident involved a breach of the Ground Operations Manual of the airline company, and to assess their understanding of the training materials regarding the handling of personal data privacy. Furthermore, the airline company requested the Complainant to delete the personal data of other individuals contained in the Sample Forms that he held and confirmed such deletion with the Complainant. The station manager in Phu Quoc also conducted random spot checks on the

email responses from ground handling agents on the processing of baggage claims to ensure compliance with the guidelines and policies of the relevant airline company.

Investigation Findings

The PCPD has commenced an investigation into the incident and conducted five rounds of enquiries with the airline company. The airline company admitted that the staff in question did not follow the instructions set out in the Ground Operations Manual and the training materials, and wrongfully sent the Sample Forms containing real personal data of other individuals to the Complainant for reference when the Complainant filled in the forms.

Having considered the circumstances of the incident and the information obtained during the investigation, the Privacy Commissioner for Personal Data (Privacy Commissioner), Ms Ada CHUNG Lai-ling, found that the following deficiencies of the airline company were the main contributing factors of the occurrence of the incident:-

1. **Failure to take effective measures** to raise the awareness of the staff members of the Ground Service Agent of the requirements relevant to personal data privacy as set out in the Ground Operations Manual, and of the need to protect personal data privacy;
2. **Failure to provide sufficient and regular training** to staff members of the Ground Service Agent, including reminding the ground handling agents not to disclose personal data of passengers to other individuals; and
3. **Failure to monitor the performance of ground handling agents**, including checking the outgoing communication records of the Ground Service Agent. If the relevant checks have been done, it would likely have prevented the occurrence of the incident.

The Privacy Commissioner's Decision

Data Protection Principle (DPP) 4(1) in Schedule 1 to the PDPO stipulates that all practicable steps shall be taken by a data user to ensure that any personal data held by a data user should be protected against unauthorised or accidental access, processing, erasure, loss or use.

Having taken into account the above-mentioned deficiencies in the personal data security measures of the airline company, the Privacy Commissioner found that the relevant airline company had not taken all practicable steps to ensure that the personal data involved was protected against unauthorised or accidental access, processing, erasure, loss or use, thereby contravening DPP 4(1) of the PDPO concerning the security of personal data.

The Privacy Commissioner has served an Enforcement Notice on the relevant airline company, directing it to take measures to remedy the contravention and to prevent recurrence of similar contraventions in future.

**Ada CHUNG Lai-ling
Privacy Commissioner for Personal Data
27 March 2026**