

私隱專員的話

Privacy Commissioner's Message



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善用人工智能 構建數碼私隱新時代

歡迎大家參閱個人資料私隱專員公署(私隱專員公署)2024-25年度的年報。今年年報的主題圍繞着兩種「AI」——分別是**成果及影響**(Accomplishments and Impacts)，以及**人工智能**(Artificial Intelligence，AI)。

Leveraging Artificial Intelligence for a New Digital Privacy Era

Welcome to the 2024-25 Annual Report of the Office of the Privacy Commissioner for Personal Data (PCPD). The year covered by this report was defined by the dual themes of AI – **Accomplishments and Impacts**, as well as **Artificial Intelligence** (AI).

私隱專員公署過去一年工作的成果及影響碩果纍纍。年內我們在循規行動方面創下了前所未有的成績，亦主動調查多宗備受關注的案件，足證我們在執法行動上的決心，並對違反《個人資料(私隱)條例》《私隱條例》的行為採取零容忍的態度。在數碼私隱的新時代，面對數據安全及網絡安全風險日益增加，公署成功推出多項推廣數據安全的措施，提升大眾對數據安全重要性的認知。

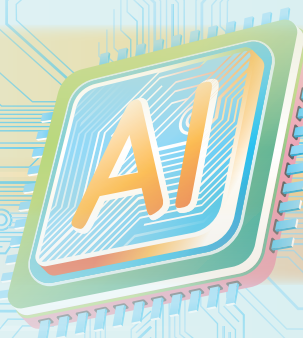
在AI領域方面，私隱專員公署採取的措施在本地以至國際間均引起不少迴響。我們出版了香港首份有關AI的個人資料保障模範框架，引導香港業界及機構在使用AI時負責任地保障個人資料。與此同時，我們聯同環球私隱或資料保障監管機構，在AI領域尋求創新與安全的微妙平衡。

本年報充分反映私隱專員公署一直堅守的價值，同時展示公署作為「改革者」的決心和發展，以及我們如何在瞬息萬變的數碼世界中識變、應變及求變。

The accomplishments and impacts can be seen through our work over the year, during which we achieved record-breaking results in compliance actions and proactively commenced investigations into multiple high-profile cases, demonstrating our commitments to enforcement actions and zero tolerance of breaches of the Personal Data (Privacy) Ordinance (PDPO). In the face of escalating data security and cybersecurity risks, we successfully launched a multitude of data security initiatives to drive home the importance of safeguarding data security in this new digital privacy era.

In the realm of AI, our initiatives have created impacts both locally and globally. We published the city's inaugural model personal data protection framework for AI to steer Hong Kong's industries and organisations towards the responsible protection of personal data in using AI, while spearheading efforts to strike a delicate balance between innovation and security in AI among global privacy or data protection regulators.

This Annual Report reflects the long-standing values of my Office that shone through the year – a year marked by determination and growth as a reformer for the PCPD, showcasing our drive to proactively identify, respond to and steer changes in the rapidly evolving digital landscape.



2024-25的主要數字

作為個人資料私隱的守護者，私隱專員公署於2024-25年度致力在各方面履行職能，保障個人資料私隱。報告年度內，我們：

Notable Figures in 2024-25

As the guardian of personal data privacy, we are dedicated to upholding the protection of individuals' personal data privacy by fulfilling our responsibilities on all fronts in 2024-25. During the reporting year, we:

- 接獲**3,450**宗投訴個案；
Received **3,450** complaints;
- 處理**370**宗「起底」個案；
Handled **370** doxxing cases;
- 展開**134**次調查；
Commenced **134** investigations;
- 接獲**207**宗資料外洩事故通報；
Received **207** data breach notifications;
- 接獲**18,381**宗公眾查詢；
Received **18,381** public enquiries;
- 進行**443**次循規行動；
Conducted **443** compliance actions;
- 展開**88**次刑事調查；
Initiated **88** criminal investigations;
- 採取**20**次拘捕行動並拘捕**21**人；
Mounted **20** arrest operations and arrested **21** persons;
- 發布**62**篇新聞稿；
Issued **62** media statements;
- 回應**225**宗傳媒查詢；
Responded to **225** media enquiries;
- 各媒體發布了**3,024**則與私隱專員公署工作相關的新聞；
Noted **3,024** news reports relating to the PCPD's work across various media channels;
- 錄得每月平均**344,610**人次瀏覽私隱專員公署網站；
Logged an average of **344,610** visits to the PCPD's website each month;
- 於社交媒體發表**671**篇帖文；及
Published **671** social media posts; and
- 錄得**57,900**人次參加私隱專員公署的講座、研習班及工作坊。
Recorded **57,900** attendances at the PCPD's talks, seminars and workshops.

2024-25年度重點工作

果斷執法 監管符規

一如既往，私隱專員公署堅決果斷地採取執法行動。2021年10月8日生效的《2021年個人資料(私隱)(修訂)條例》賦予公署的全方位機制，對簡化及加快針對「起底」案件的執法和檢控行動而言十分關鍵，我們年內的傑出成果亦充分反映此機制的成效。

與2022-23報告年度(即「起底」新條文生效後首年)相比，經私隱專員公署主動網上巡查發現的「起底」個案下跌92%，由2022-23年度的841宗下跌至本報告年度的65宗。與「起底」相關的投訴亦下跌55%，由676宗下跌至305宗。

同時，我們展開了88次刑事調查並採取了20次拘捕行動，拘捕人數達21人。私隱專員公署亦發出多份停止披露通知，成功移除3,482則「起底」訊息，「起底」訊息移除率達98.3%，情況令人鼓舞。

至於處理投訴及循規行動方面，我們於報告年內發表多份調查報告，包括一個加密貨幣項目在香港運作的調查結果，以及有關八間機構透過一個網上招聘平台刊登匿名招聘廣告的調查結果。此外，經檢視10個本港市民較常使用的網上旅遊平台收集及使用個人資料的情況後，我們在2024年11月發表《數碼時代的私隱保障：實測十個網上旅遊平台收集個人資料的情況》報告。

Highlights of Our Work in 2024-25

Proactive Enforcement and Compliance Supervision

As with previous years, my Office spared no effort to take enforcement actions. Effective from 8 October 2021, the Personal Data (Privacy) (Amendment) Ordinance 2021 has empowered the PCPD to adopt a holistic approach that has been instrumental in streamlining and expediting enforcement and prosecution actions against doxxing cases, as highlighted by the outstanding results we accomplished over the year.

When compared to the 2022-23 reporting year (i.e. the first year after the commencement of the new anti-doxxing regime), the number of doxxing cases uncovered by the PCPD's proactive online patrols dropped by 92%, from 841 cases in 2022-23 to 65 cases in the reporting year. The number of doxxing complaints also decreased by 55%, from 676 to 305.

Furthermore, we initiated 88 criminal investigations and mounted 20 arrest operations, resulting in the arrest of 21 individuals. By serving cessation notices on online platforms and removing as many as 3,482 doxxing messages, we achieved a very satisfactory removal rate of over 98.3% of doxxing messages.

As regards our work on complaints handling and compliance actions, we released multiple investigation reports during the reporting year, including one covering investigation findings on the operation of a cryptocurrency project in Hong Kong, and another regarding the act of placing "blind" recruitment advertisements on an online recruitment platform by eight organisations. In addition, we published our flagship report titled "Privacy Protection in the Digital Age: A Study of the Collection of Personal Data by 10 Online Travel Platforms" in November 2024 after reviewing the collection and use of personal data by 10 online travel platforms commonly used by citizens in Hong Kong.

多管齊下 構建數據安全堅固防線

隨着 21 世紀走入數碼轉型的年代，不論本地抑或國際間的數據安全威脅亦見增加，而且手法越趨精密。保障數據安全對維護個人資料私隱及推動可持續發展的數字經濟而言至關重要。報告年度內，我們多管齊下，透過採取不同措施及與各界協作，在各個領域推廣保障數據安全的重要性。這些措施包括提供數據安全工具、舉辦關注私隱的活動及與業界夥伴合作。

特別是，有鑑於資料外洩事故呈上升趨勢，尤其是涉及學校、非牟利機構及中小企的資料外洩事故，私隱專員公署推出了「數據安全」套餐。機構在完成「數據安全快測」評估其數據安全措施是否足夠後，可獲免費名額參加由公署舉辦的研習班及講座。機構亦可透過公署的「數據安全」專題網頁及「數據安全」熱線查閱相關資訊並尋求協助，為應對網絡安全威脅作好準備。

除了提供工具協助業界主動預防資料外洩事故，我們亦舉辦多項宣傳活動，包括在 2024 年 5 月舉辦以「數據安全保私隱」為主題的旗艦活動「關注私隱週 2024」。除了舉辦有關數據安全的研討會以及為不同機構舉辦內部培訓講座，私隱專員公署亦與業界加強合作，在推廣數據安全方面發揮協同效應。

Multi-pronged Approach to Building a Strong Data Security Defence

As the 21st century ushers in an era of digital transformation, we are simultaneously witnessing data security threats ramping up and becoming more intricate, both domestically and internationally. Safeguarding data security is critical for both upholding personal data privacy and driving a sustainable digital economy. Throughout the reporting year, we adopted a multi-pronged approach characterised by diverse initiatives and collaborative engagement to promote the importance of safeguarding data security across different sectors. These efforts included offering data security tools, launching awareness programmes and collaborating with industry partners.

In particular, owing to the upward trend in data breach incidents, particularly those involving schools, non-profit-making organisations, and small and medium-sized enterprises, we launched the “Data Security” Package, providing free quotas for participating organisations to join our professional workshops and seminars upon completion of an assessment by the “Data Security Scanner”, which assesses the adequacy of their data security measures. Organisations can also access relevant information and seek assistance via the “Data Security” thematic webpage and the “Data Security” Hotline provided by us to better equip themselves against cybersecurity threats.

Beyond equipping industries with tools to proactively prevent data breaches, we organised various promotional activities, including the flagship event “Privacy Awareness Week 2024” under the theme “Safeguard Data Security • Safeguard Privacy” in May 2024. In addition to organising seminars on data security and conducting in-house training sessions for different organisations, we also strengthened our collaboration with the industry to create synergy in promoting data security.

繼往開來 揭開人工智能安全新一頁

推廣人工智能安全一直是私隱專員公署的重點工作。繼2021年出版《開發及使用人工智能道德標準指引》及2023年出版《使用AI聊天機械人「自保」十招》單張這兩份廣受好評的指引後，公署於2024年6月適時發布亞太區在保障私隱領域其中一份最早出版且具領導地位的AI指引——《人工智能(AI)：個人資料保障模範框架》(《模範框架》)，並在2025年3月發布《僱員使用生成式AI的指引清單》(《指引》)。年內，生成式AI引發了廣泛討論，而如何在創新與安全之間取得平衡亦成為焦點議題。《模範框架》提供國際認可及切實可行的建議和最佳行事常規，以協助機構在採購、實施及使用AI，包括生成式AI時，遵從《私隱條例》的相關規定，而《指引》則着重協助機構制定僱員在工作時使用生成式AI的內部政策或指引。

《模範框架》自推出以來，廣獲本地社會各界的認同和支持，更於亞太區 GovMedia Conference & Awards 中榮獲「2025 年度香港公營機構倡議——監管組別」的獎項。這項國際級的肯定，印證私隱專員公署出版的指引在本地及國際層面均具高度參考價值與影響力。

A New Chapter in AI Security

Promoting AI security has always been a priority for my Office. Building on prior success in publishing the “Guidance on the Ethical Development and Use of Artificial Intelligence” in 2021 and the “10 TIPS for Users of AI Chatbots” leaflet in 2023, we timely issued the “Artificial Intelligence: Model Personal Data Protection Framework” (Model Framework) – one of the first leading guides on AI in the privacy landscape in the Asia-Pacific region – in June 2024, and the “Checklist on Guidelines for the Use of Generative AI by Employees” (Guidelines) in March 2025. This year was marked by intense discussions on generative AI and ongoing debates about balancing innovation and safety. The Model Framework provides internationally recognised and practical recommendations and best practices, with a view to assisting organisations in procuring, implementing and using AI, including generative AI, in compliance with the relevant requirements of the PDPO, while the Guidelines focus on assisting organisations in developing internal policies or guidelines on the use of generative AI by employees at work.

Since the publication of the Model Framework, it has garnered widespread recognition and support across various sectors of the society. My Office has won the “2025 Hong Kong Public Sector Initiative of the Year – Regulatory” award in the Asia Pacific GovMedia Conference & Awards for the Model Framework. This international accolade underscores the high reference value and impacts of our published guidance both locally and globally.

私隱專員公署委託香港生產力促進局進行有關網絡保安準備的調查，並於2024年11月發表「香港企業網絡保安準備指數及AI安全風險」調查報告結果。調查發現，大部分受訪企業（近七成）認為在營運中使用AI會帶來顯著的私隱風險，反映機構極需採用適當的指引，例如公署的《模範框架》，以緩減實施AI所帶來的私隱風險。

AI相關的風險與日俱增，已成為迫在眉睫的全球性問題。就此，私隱專員公署積極應對，與國際夥伴攜手合作。自2024年10月起，公署擔任環球私隱議會轄下的人工智能的道德與數據保障工作分組聯席主席。基於環球私隱議會是集合全球超過130個私隱或資料保障機構且具領導地位的國際平台，這標誌着我們在積極參與全球性AI管治討論方面一個重要的里程碑。

另一方面，私隱專員公署繼續擔任環球私隱議會轄下的國際執法合作工作分組聯席主席，持續關注全球數據擷取問題，包括在網上大規模擷取個人資料作訓練AI模型的情況。建基於2023年8月發表的首份聯合聲明，公署在2024年10月聯同全球15個私隱或資料保障機構，向主要社交媒體平台及公開網站發出環球聯合聲明，就保障個人資料免遭非法數據擷取向業界提供進一步指引。

My Office commissioned the Hong Kong Productivity Council to conduct a survey on cyber security readiness and released the results of the “Hong Kong Enterprise Cyber Security Readiness Index and AI Security” survey in November 2024. The survey revealed that a significant majority (around 70%) of the surveyed enterprises perceived that using AI in their operations posed significant privacy risks. This underscores the need for organisations to adopt appropriate guidelines, such as my Office’s Model Framework, to mitigate privacy risks associated with the implementation of AI.

The surge in AI-related risks has become a pressing global issue. In response, my Office has stepped up to the plate, joining forces with international partners. Since October 2024, we have taken on the role of co-chair in the Ethics and Data Protection in Artificial Intelligence Working Group under the Global Privacy Assembly (GPA). Since the GPA is a leading international forum for over 130 privacy or data protection authorities worldwide, this marks a significant milestone in our active participation in the discussions on global AI governance.

As my Office remained the co-chair of the International Enforcement Cooperation Working Group of the GPA, we continued to look into the worldwide data scraping issue, including mass extraction of personal data online for training AI models. Riding on an initial joint statement from August 2023, my Office and 15 other privacy or data protection authorities around the world issued a concluding statement to major social media platforms and public websites in October 2024, providing the industry with further guidance on protecting personal data against unlawful data scraping.

與時俱進 推廣私隱保障

個人資料保障領域瞬息萬變，私隱專員公署的推廣策略亦要因時制宜、與時俱進。其中，公署不斷優化防騙宣傳策略，以應對不斷演變的挑戰，例如AI深度偽造騙案的出現。在2024-25年度，我們繼續走進社區，在社交媒體平台、屋邨及醫院播放防騙宣傳短片、在學校舉辦防騙講座，並於中秋節及聖誕節探訪「老友記」，加強他們的防騙意識，向他們介紹公署的「防騙六招」。

Moving with the Times in Promoting Privacy Protection

Given the dynamic nature of the personal data protection landscape, our promotional efforts must also adapt and advance. In particular, we have constantly refined our anti-fraud promotional efforts to keep pace with evolving challenges, such as the emergence of AI deepfake scams. In 2024-25, we continued to reach out to the community by broadcasting anti-fraud videos on social media platforms, housing estates and hospitals, organising anti-fraud talks at schools and visiting the elderly during the Mid-Autumn Festival and Christmas periods to enhance anti-fraud awareness, featuring our "Six Tips to Prevent Fraud".



促進大灣區個人資料跨境流動

有見數據跨境流動對推動香港發展為數據中心，以及促進粵港澳大灣區（大灣區）發展數字經濟所擔當的重要角色，在報告年度內，私隱專員公署與香港政府及內地當局繼續緊密合作，促進個人信息在大灣區內安全有序跨境流動。

隨着《粵港澳大灣區（內地、香港）個人信息跨境流動標準合同》便利措施於2024年11月擴展至全港各行各業，私隱專員公署積極投入不同宣傳及教育活動，進一步推動各界採用便利措施。

Facilitating Cross-boundary Flows of Personal Data within the Greater Bay Area

Recognising the crucial role of cross-boundary data flows in driving the development of Hong Kong as a data centre and fostering the development of digital economy within the Guangdong-Hong Kong-Macao Greater Bay Area (GBA), my Office has continued to work closely with the Hong Kong Government and Mainland authorities to facilitate the safe and orderly cross-boundary flows of personal information within the GBA during the reporting year.

With the extension of the facilitation measures of the Standard Contract for Cross-Boundary Flow of Personal Information Within the Guangdong-Hong Kong-Macao Greater Bay Area (Mainland, Hong Kong) to all sectors in Hong Kong in November 2024, we enthusiastically engage in different publicity and educational activities to further promote the adoption of the facilitation measures across industries and sectors.



展望未來

這年報涵蓋的時期見證人類歷史上AI的崛起，猶如發現「新電力」。這個變革性的時代為所有人，包括私隱專員公署帶來挑戰。展望將來，我們會繼續在瞬息萬變的數碼世界中識變、應變及求變，我與公署同事將繼續上下一心，竭力求進、守正創新，做好「改革者」的本分，以高水平安全護航國家及香港的高質量發展，推廣人工智能安全及數據安全，構建尊重個人私隱的和諧社會，改善民生，令東方之珠綻放更璀璨的輝煌。

最後，本人衷心感謝香港特別行政區政府政制及內地事務局，以及私隱專員公署兩個諮詢委員會（個人資料（私隱）諮詢委員會和科技發展常務委員會）的委員，一直支持公署的工作，推動我們取得持續的工作成果及影響。我亦感激公署敬業樂業的所有同事，他們展現專業認真的精神，群策群力、孜孜不倦地為服務市民而努力。

**讓我們同心協力，
擔當「改革者」，
共創數碼私隱新時代。**

鍾麗玲, SBS

大律師

個人資料私隱專員

2025年9月

Looking Ahead

This Annual Report covers an unprecedented period in human history marked by the rise of AI as the “new electricity”. This transformative era has brought challenges to all of us, and my Office was of no exception. Looking ahead, we would continue to proactively identify, respond to and steer changes in the constantly evolving digital privacy landscape. We would strive to embrace the role of a reformer in our innovative journey, seeking to facilitate the high quality development of the Country and Hong Kong while safeguarding a high level of security, including data security and AI security. In tandem, we would continue to promote the building of a harmonious society that respects personal privacy for the betterment of the society, a society that emits the dazzling radiance of the Pearl of the Orient.

Last but not least, I wish to extend my heartfelt gratitude to the Constitutional and Mainland Affairs Bureau of the Hong Kong SAR Government, as well as members of my Office’s two advisory committees, the Personal Data (Privacy) Advisory Committee and the Standing Committee on Technological Developments. Their unwavering support has been integral to our continuous accomplishments and impacts. I would also like to acknowledge and thank the dedicated professionals of my Office for their exceptional contributions. Their collective expertise, coupled with tireless commitment, has been of profound benefit to the public good.

**Let us Embrace the Role of a Reformer to
Usher in a New Digital Privacy Era.**

Ada CHUNG Lai-Ling, SBS

Barrister

Privacy Commissioner for Personal Data

September 2025