

ACRA’S PROPOSALS ON PERSONAL DATA COLLECTION AND USE, FILING CONVENIENCE AND DIGITAL CORRESPONDENCES

Proposed amendments to the ACRA Act, Companies Act (“CA”), Variable Capital Companies Act (“VCC Act”), Business Names Registration Act (“BNRA”), Limited Partnerships Act (“LP Act”), Limited Liability Partnerships Act (“LLP Act”) and Accountants Act (“AA”) and their related subsidiary legislation

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
Greater flexibility in collection and sharing of Personal Data				
1.	<p>s 6(1)(c) ACRA Act</p> <p>s 12(2) CA</p> <p>s 9(2) VCC Act</p> <p>s 28(1) BNRA</p> <p>s 28B(1) LLP Act</p> <p>s 18B(1) LP Act</p> <p>s 8(2)(b) and s 12B(1) AA</p>	<p>One of the functions of ACRA is to establish and administer a repository of documents and information relating to business entities and public accountants and to provide access to the public to such documents and information.</p> <p>The various Acts which ACRA administers also currently sets out that information and documents that are required to be filed with ACRA are available for inspection and copies or extracts of documents available for purchase, unless explicitly specified.</p>	<p>To make amendments to:</p> <p>(a) provide flexibility for ACRA to specify additional personal data relating to business owners that may need to be collected through subsidiary legislation; and</p> <p>(b) introduce a tiered disclosure framework to calibrate the disclosure of personal data and in this way, give greater flexibility to ACRA as to what data is made available to the public. For personal data which ACRA collects and is not made public, ACRA would also have the discretion to make that data available within the Government (and with selected external organisations) for specific purposes, such as to counter illicit business activities and protect public/national interests.</p>	<p>Currently, the personal data information required to be provided to ACRA can be expressly required under the various Acts or is collected as part of the transaction form required by ACRA (i.e. by way of a prescribed form). For greater consistency in how ACRA requires personal data to be collected and for greater clarity on why such personal data is being collected, it is proposed that ACRA, in addition to express provisions in the Act, be able to specify the personal data to be collected in subsidiary legislation.</p> <p>The current approach under which, as a general principle, the public may inspect and purchase of copies or extracts of documents which are filed with ACRA, is inflexible, as all information in documents filed with</p>

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		<p>Exceptions are gazetted Government-owned exempt private companies (whose filed documents would not be in the public interest to be open to inspection), Variable Capital Companies (annual returns and constitution are not to be publicly disclosed), certain Limited Partnerships (particulars of limited partners of relevant limited partnerships are not open to public inspection under Reg 12 of the Limited Partnerships Regulations, and registrable controller information filed by companies and limited liability partnerships.)</p>	<p>It is noted that there is some precedent for such an approach, for example, Australia’s Commonwealth Registers Act 2020. Under that Act, the Registrar may, by legislative instrument make a disclosure framework that provides for matters such as:</p> <ul style="list-style-type: none"> (a) the circumstances in which protected information must not be disclosed without the consent of the person to whom it relates; (b) the circumstances in which de-identified protected information may be disclosed; (c) the circumstances in which protected information may be disclosed to the general public; (d) the circumstances in which confidentiality agreements are required for the disclosure of protected information; and (e) the imposition of conditions on disclosure of protected information. 	<p>ACRA is accessible by the public, including personal data.</p> <p>For regulatory purposes, ACRA may collect certain personal data that for personal data privacy reasons should not be disclosed to the public¹. ACRA proposes to differentiate between what data should be in the public domain, and what data should not be made available to the public, so as to be better able to exercise flexibility in determining what new data to share.</p>
Standardisation of Personal Data				

¹ E.g. NRIC number; date of birth; residential address; mobile number; and email address.

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2.	<p>There are specific provisions in the various Acts which refer to the requirement for individuals to provide their names (for example, for the purpose of registration, return on allotment of shares, etc)</p> <p>Some examples:</p> <p>CA</p> <p><i>Return on allotment:</i></p> <ul style="list-style-type: none"> • s63(1)(e). 63A(1)(e) – provision of “full name” of member <p><i>Registers:</i></p> <ul style="list-style-type: none"> • s173(3), (5), (6). (7) – provision of “full name” of directors, CEO, secretaries, 	<p>References to information to be provided to the Registrar in respect of names are currently not aligned within the CA, as well as across the various Acts administered by ACRA.</p>	<p>To make amendments to clarify that the reference to the “full name” or “name” of an individual, where these terms appear in the CA, VCC Act, BNRA, LP Act, LLP Act, AA and the ACRA Act (in respect of filing agents or qualified individuals), means the name of an individual as stated in the identity card (where such individual is registered under the National Registration Act (“NRA”)), or in the passport or similar evidence of identity (for individuals not registered under NRA). The name on the identity card includes the principal name, hanyu pinyin name, alias, hanyu pinyin alias and married name.</p>	<p>To standardise the definition of “name”, in respect of individuals, used in the CA and across all the various ACRA-administered Acts to facilitate greater uniformity in data, and the implementation of the proposals relating to the streamlining of the filing process/ obligations in items 7 and 8 below.</p>

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
	<p>auditors in the respective registers</p> <ul style="list-style-type: none"> • s173F(5) – restoring the “name” of the person mistakenly removed from the register • s196A(2)(a)(i), (iv) – provision of “name” of member in the electronic register of members <p>VCC Act</p> <p><i>Registers:</i></p> <ul style="list-style-type: none"> • s71(1) VCCA applies s173 of CA (register of directors, secretaries and auditors) <p>VCC (Lodgment of Documents) Regulations</p> <p><i>Incorporation of VCC:</i></p>			

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
	<ul style="list-style-type: none"> • Reg 11(2)(h)(i), (j)(i), (k)(i) provision of “name” of subscriber, secretary, auditor <p>BNRA</p> <p><i>Registration of business name:</i></p> <ul style="list-style-type: none"> • s6(1)(iv), (vii) – provision of “full name” of individual proprietor, authorised representative <p><i>Registration by nominee/ trustee:</i></p> <p>Business Names Registration Regulations</p> <ul style="list-style-type: none"> • Reg. 8(b)(ii), (c) – provision of “name” of nominee 			

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	<p>or trustee, beneficiary</p> <p>LP Act <i>Registration of LP:</i></p> <ul style="list-style-type: none"> • s11(1)(e)(i),(g) – provision of “full name” of partner, local manager <p>LLP Act <i>Registration of LLP</i></p> <p>s15(1)(d)(i), (ea) – provision of “full name” of partner, manager</p> <p>AA <i>Registration of Public Accountants (“PA”)</i></p> <ul style="list-style-type: none"> • s11(1A) – PA registration application to contain full name 			

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	<ul style="list-style-type: none"> • s12(1) – Registrar to record name of PA in register <p>ACRA (Filing Agents and Qualified Individuals) Regulations</p> <ul style="list-style-type: none"> • Registered Filing Agent (“RFA”) to notify ACRA of “name” and particulars of Registered Qualified Individuals (“RQI”) employed by the RFA 			
Personal Data Privacy				
3.	There are specific provisions in the various Acts which refer to the requirement for identification (“ID”) numbers to	In view of the current provisions described in item 1, the ID numbers which are filed with ACRA are accessible to the public.	To make amendments to partially mask the ID number of all individuals in ACRA’s registers which are made available to the public, to protect their personal data privacy. This would apply to the identification numbers of	Public awareness about data privacy has risen in recent years, and ACRA has received feedback from directors and shareholders, expressing concerns that their personal data, particularly their full identification number and residential address, are made public.

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<p>be filed with ACRA, or ID numbers are required in the BizFile+ forms required to be filed with ACRA.</p> <p>Some examples:</p> <p>CA <i>Company registers:</i></p> <ul style="list-style-type: none"> • s173(3)(d) (register of directors) • s173(5)(d) (register of CEOs) • s173(6)(c) (register of secretaries) • s173(7)(c) (register of auditors) <p><i>Registration of foreign company</i> s368(1)(e) Companies Act – Foreign company's</p>		<p>Singapore citizens, permanent residents and foreign individuals.</p> <p>ACRA will also explore the feasibility of masking lodged documents in pdf/image format through the use of technology.</p> <p>On the extent of the masking, only the last 4 alphanumeric characters of the ID number will be shown to the public. This amount of information, together with other information of the individual (e.g. name, nationality and contact address/entity email address) should be sufficient for identifying an individual.</p> <p>For the avoidance of doubt, the proposal will only affect the disclosure of identification numbers to the public. ACRA will continue to collect the full identification numbers and such identification numbers may continue to be shared with other government agencies as part of ACRA's role of being the repository of business data and certain third parties, as to be determined by that data disclosure framework proposed in item 1.</p>	<p>The proposed amendment is intended to better cater to concerns with personal data privacy.</p>

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	<p>lodgement of “identification particulars” (amongst other personal information) of its authorised representative(s) on registration of foreign company (before it establishes place of business or commences carrying on business in Singapore).</p> <p>VCC Act <i>VCC registers:</i></p> <ul style="list-style-type: none"> • s71(1) VCCA applies s173 of CA (register of directors, secretaries and auditors) <p>BNRA</p>			

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	<p><i>Registration of a business name:</i></p> <ul style="list-style-type: none"> • s6(1)(b)(iv) (for an individual proprietor) • s6(1)(b)(vi)(A) (for partners (in the case of a firm where every partner is an individual) • s6(1)(b)(vii) (for authorised representative) • s7 (for nominees or trustees) <p>LP Act</p> <p><i>Registration of partner/local manager</i></p> <ul style="list-style-type: none"> • s11(1)(e)(ii) (registration of individual as partner) 			

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
	<ul style="list-style-type: none"> • s11(1)(g)(ii) (registration of individual as local manager) <p>LLP Act</p> <p><i>Registration of partner/manager</i></p> <ul style="list-style-type: none"> • s15(1)(d)(ii) (registration of individual as a partner) • s15(1)(ea)(ii) (registration of individual as manager of an LLP. <p>AA</p> <p><i>Registration of public accountant</i> s11(1A)(b)</p>			
4.	There are a number of provisions in the various Acts which require residential	In view of the current provisions described in item 1, residential addresses	To make amendments to introduce a “contact address” as the default address that will be shown to the public. The contact address has a similar function to	For reasons similar to those mentioned in item 3, the proposed amendment is intended to better cater to concerns with personal data privacy.

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<p>addresses of persons to be provided to the Registrar/ ACRA. There is an option for position holders to reflect an alternate address in ACRA's public records instead of residential address.</p> <p>Some examples:</p> <p>CA <i>Company registers:</i></p> <ul style="list-style-type: none"> • s173(3)(b) (register of directors) • s173(5)(b) (register of CEOs) • s173(6)(b) (register of secretaries) <p><i>Alternate address:</i></p>	<p>which are filed with ACRA are accessible to the public. Position holders have an option to provide ACRA with an address in addition to their residential address which will be displayed to the public instead of their residential address. The address must be one where the company officer can be contacted and must be within the same jurisdiction as the residential address, and cannot be a P.O. Box address.</p> <p>If a position holder who provides an alternate address cannot be reached at the alternate address provided, ACRA may display the position holder's residential address in the public records instead.</p>	<p>an alternate address in protecting the individual's privacy. However, instead of being an option that individuals whose addresses are required to be filed with ACRA² are required to apply and pay a fee for, contact addresses will be required during filing, and will be used as the default address that is shown publicly at no additional cost.</p> <p>Residential addresses will continue to be required to be filed but will not be made public. Residential addresses will only be disclosed to government agencies or the public in the event that the individual cannot be contacted at his contact address. Similar to alternate address, this proposal will not apply retrospectively as it would require massive data changes to amend all past records. Residential addresses will therefore continue to be shown on filings lodged with ACRA up to the point in time when the collection of default address is introduced.</p>	

² Such persons include position holders (e.g. directors; company secretaries; and auditors); shareholders; corporate service providers (registered qualified Individuals); group secretaries; and liquidators.

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
	<ul style="list-style-type: none"> • s173G (Registrar not to disclose residential address of director if there is alternate address) <p><i>Foreign companies</i> – registration:</p> <ul style="list-style-type: none"> • s368(1)(d) (foreign company registration – residential address of directors) • s368(1)(e)(foreign company registration – residential address of authorised rep) <p><i>Foreign companies - Alternate address:</i></p>			

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	<ul style="list-style-type: none"> • s370A(1)(Registrar not to disclose residential address of director/ authorised rep if there is alternate address) <p>VCC Act <i>VCC registers:</i></p> <ul style="list-style-type: none"> • s71(1) VCCA applies s173 of CA (register of directors, secretaries and auditors) <p><i>Alternate address:</i></p> <ul style="list-style-type: none"> • s75 VCCA (Registrar not to disclose residential address of director/secretary if there is alternate address) <p>BNRA</p>			

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
	<p><i>Registration of a business name:</i></p> <ul style="list-style-type: none"> • s6(1)(b)(iv) (for an individual proprietor) • s6(1)(b)(vi)(A) (for partners (in the case of a firm where every partner is an individual) • s6(1)(b)(vii) (for authorised representative) <p><i>Alternate address:</i></p> <ul style="list-style-type: none"> • s30(1) (Registrar not to disclose residential address of individual if there is alternate address) <p>LP Act</p>			

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	<p><i>Registration of partner/local manager:</i></p> <ul style="list-style-type: none"> • s11(1)(e)(iv) (registration of individual as partner) • s11(1)(g)(iv) (registration of individual as local manager) <p><i>Alternate address:</i></p> <ul style="list-style-type: none"> • s18C(1) (Registrar not to disclose residential address of partner/ local manager if there is alternate address) <p>LLP Act</p> <p><i>Registration of partner/ manager:</i></p> <ul style="list-style-type: none"> • s15(1)(d)(iv) (registration of individual as a partner) 			

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	<ul style="list-style-type: none"> • s15(1)(ea)(iv) (registration of individual as manager of an LLP. <p><i>Alternate address:</i></p> <ul style="list-style-type: none"> • s28C(1) (Registrar not to disclose residential address of partner/ manager if there is alternate address) <p>AA <i>Registration of PA</i></p> <ul style="list-style-type: none"> • s11(1A)(d) (registration as a PA) <p><i>Alternate address</i></p> <ul style="list-style-type: none"> • s12C(1) (Registrar not to disclose residential address of PA if there is alternate address) 			

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Facilitating Digital Communications				
5.	New provision to collect email addresses and mobile numbers	ACRA currently collects businesses' registered office address and position holders' residential address (or alternate address, if provided). However, ACRA is not currently empowered to collect or require updating of email addresses and mobile numbers for position holders and business entities.	<p>(a) To introduce provisions in the various Acts to require position holders and shareholders/members to provide and update email addresses and mobile numbers.</p> <p>“Position holders” refer to the following:</p> <ul style="list-style-type: none"> (i) Local Company - Directors, Alternate Directors, Managing Directors, CEOs, Secretaries (ii) Foreign Company - Authorised Representatives, Directors (iii) Business - Owners, Nominees/ Trustees, Authorised Representatives (iv) LP – General Partners, General Partners as Nominees/ Trustees, Limited Partners, Managers (v) LLP - Partners, Managers (vi) Public Accountants (vii) Public Accounting Corporation – Public Accountant Employees, Directors and Directors under S17(3)(d) of AA (viii) Public Accounting LLP – Public Accountant Employees, 	<p>Email addresses of businesses, position holders and shareholders/members and mobile numbers of position holders and shareholders/members will help to facilitate Government-to-Business (“G2B”) digital communications, which will provide the digital foundation / support base for other government digitalisation projects. It will also reduce cost for businesses and government and improve efficiency in G2B communications (e.g. faster response from government and vice versa).</p> <p>It is noted that communication by electronic mail or SMS via mobile numbers may not be an appropriate mode of correspondence for official notices or letters. Accordingly, ACRA has proposed in a separate proposal (see item 6 below) that correspondences and notices sent by ACRA, other than summons, be posted on the recipient's dashboard in BizFile+. The notification that a correspondence or notice has been sent</p>

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			<p>Partners and Partners under S18A(3)(e) of AA</p> <p>(ix) Public Accounting Firm - Public Accountant Employees, Partners and Partners under S18(3)(c) of AA</p> <p>(x) Corporate Service Providers – Registered Qualified Individuals, Employees</p> <p>(xi) Group Secretaries, Employees of Group Secretaries</p> <p>(xii) Liquidators</p> <p>(b) To introduce provisions in the various Acts to require business entities to provide and update business email addresses.</p>	to the dashboard will however be alerted to the recipient via electronic mail or SMS.
6.	New provision to cater for the use of ACRA dashboard for statutory correspondences and notices sent by ACRA	Currently, under each of the ACRA administered Acts ³ , correspondences and notices sent by the Registrar of Companies, Registrar of Business Names, Registrar of Limited Liability Partnerships, Registrar of Limited Partnerships and	Correspondences and notices, other than summonses, sent by the Registrar will be posted on the recipient’s dashboard in BizFile ⁺ . Amendments to the ACRA Act are proposed to expressly provide that such delivery will be deemed to constitute valid delivery of such correspondences and notices. Consequential amendments will be made	In line with the move towards greater digitalisation, ACRA intends to move away from the sending of hardcopy letters and notices, and replace these with digital letters and notices sent via a virtual mailbox. This mailbox will be accessible via a dashboard in BizFile ⁺ , and is a secure platform to which only authorised persons would have access,

³ See for example, section 202B of the Companies Act (Registrar’s notice to directors in respect of defective financial statements), section 38A of the Limited Liability Partnerships Act (Registrar’s letter to limited liability partnership, and its managers and partners informing them of application for striking off), section 23 of the Business Names Registration Act (Registrar’s notice of proposed cancellation of registration) etc.

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		Registrar of Public Accountants (collectively, the “Registrar”) to companies, VCCs, businesses, limited liability partnerships, limited partnerships or public accounting entities and/or officers, shareholders/members, business owners, managers, partners etc. are sent via hardcopy to the registered address of the entity or the residential or alternate addresses of the individual, as the case may be.	<p>to each respective Act to remove references to letters or hardcopy notices.</p> <p>The dashboard will be available to public accountants, business owners, partners or officers of businesses and public accounting entities.</p> <p>For the avoidance of doubt, the amendments will allow the Registrar to send correspondences or notices using electronic means, but will still retain the option for the Registrar to send hard copy letters or notices, where necessary.</p> <p>Any summons sent by the Registrar will continue to be sent via hard copy to the registered address of the entity or the residential or alternate address of an individual.</p>	through the use of SingPass/CorpPass. This will ensure the security and privacy to the content of these letters and notices.
Streamlining of filing process/obligation				
7.	New provision	Currently, ACRA has the power to rectify or update particulars or documents kept in its registers under limited circumstances. In particular, if the Registrar is satisfied that there is evidence of a conflict between the particulars of	<p>To make amendments to the Acts referred to in the third column to enable ACRA to do the following:</p> <p>(a) To draw personal information for individuals (e.g. personal biodata) from other specified government agencies for the purposes of filing such information with ACRA, such</p>	This proposed amendment is intended to facilitate consistency of Whole-of-Government data and increase accuracy of data in ACRA’s records. It will also provide greater convenience to filers, by reducing the number of times they are required to provide or report changes of their personal data to government agencies.

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
		<p>an entity or person and other information in the register, or other information from a prescribed body, the Registrar may update the register.</p> <p>Examples include the following:</p> <ul style="list-style-type: none"> • s12D CA • s11 VCC Act applies s12D CA • s27 BNRA • s40B LLP Act • s21B LP Act <p>There is, however, currently no provision that allows drawing of data at the stage of filing, before the data is in ACRA's registers/records.</p> <p>Furthermore, while ACRA can rectify or update</p>	<p>that the filer does not have to input the data with ACRA during the filing of a transaction (e.g. at registration or updating of changes in particulars or shareholdings). This proposal is intended to include the personal data which is required to be filed in respect of individuals under the CA, VCCA, LLPA, LPA, BNRA, AA and ACRA Act.</p> <p>(b) To use information (e.g. business addresses) from other specified entities (e.g. banks, power and telecommunications utilities companies) to verify information on ACRA's register for regulatory/enforcement purposes.</p>	<p>The additional powers relating to the use of information from government agencies or body corporates for regulatory/enforcement purposes would assist in ACRA's efforts in taking action to increase the accuracy of filed information.</p>

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
		particulars or documents based on information from a prescribed list of government agencies or body corporates, there is also currently no power to rely on information from government agencies or body corporates for the purposes of enforcement or regulatory functions.		
8.	<p>CA s173A(1)(b) read with section 173(3), (5),(6), (7)</p> <p>s372(1)(ca) read with s368(1)</p> <p>VCC Act s72(1) VCC Act applies s173A of CA (register of directors, secretaries, managers and auditors)</p> <p>BNRA</p>	<p>There is currently a requirement for business entities to notify ACRA on the change of particulars of their position holders under the various Acts.</p> <p><i>For individuals (other than Public Accountants and Registered Qualified Individuals):</i></p> <p>A company must notify the Registrar within 14 days of change (or such further period as the Registrar may allow) in the personal information of any director,</p>	<p>To make amendments such that where any of the following individuals, who is a Singapore citizen, permanent resident or FIN holder, and whose particulars are recorded on ACRA’s register, has provided the Ministry of Home Affairs (“MHA”) or the Ministry of Manpower (“MOM”) with changes to his or her personal information (e.g. full name details, gender, date of birth, residential address and nationality), the Registrar will be empowered to obtain such changes to personal information directly from MHA and MOM:</p> <p>(a) A director, CEO, secretary or auditor of a company;</p>	<p>The proposed amendment streamlines the process of updating changes to personal information of persons registered under the CA, VCC Act, BNRA, LP Act, LLP Act, AA and ACRA Act.</p>

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	<p>s 20(1)</p> <p>LP Act</p> <p>s 18(1)(b), (d)</p> <p>LLP Act</p> <p>s 28(1)(d)</p> <p>Accountants Act</p> <p>s 14(1)</p> <p>s 22(1), (2)</p> <p>ACRA (Filing Agents and Qualified Individuals) Regulations (“FA QI Regs”)</p> <p>Para. 1, Part 1, First Schedule, FA QI Regs</p>	<p>CEO, secretary or auditor under CA.</p> <p>A foreign company must within 30 days (or such further period as the Registrar may allow) lodge with Registrar particulars of change of director or authorised representative of foreign company lodged under section 368(1).</p> <p>Whenever a change is made or occurs in any of the personal information registered in respect of any individual (ie. any person under the Business Names Registration Act, partner or manager under Limited Partnerships Act or Limited Liability Partnerships Act, or public accountants under the Accountants Act), the changes must be lodged within 14 days after the change, or such further period as the Registrar may</p>	<p>(b) A director, manager, secretary or auditor of a VCC;</p> <p>(c) A director or authorised representative of a foreign company;</p> <p>(d) Any individual under the BNRA, LP Act, LLP Act and AA;</p> <p>(e) An RFA or RQI which is an individual registered under the ACRA Act.</p> <p>For the above persons who are Singapore citizens or permanent resident, amendments are also proposed to enable ACRA to draw data from MHA on death information to update ACRA’s register.</p> <p>There will be no need for such individuals or the relevant business entity to notify ACRA of such changes.</p>	

	Statutory provision	Current requirement	Proposed amendment	Reason for amendment
	<p>Para. 2, Second Schedule, FA QI Regs.</p> <p>Para. 3(1)(b), Second Schedule, FA QI Regs</p>	<p>on application allow, with the Registrar.</p> <p><i>For PAs:</i> A PA must notify Registrar within 30 days of any change in personal information, as recorded in the Register of PA, Register of PA Corporations, Register of PA Firms or Register of PA LLPs (as the case may be) of the accounting corporation, accounting firm or accounting LLP in which he is practising.</p> <p><i>For Registered Filing Agents:</i> An RFA must notify ACRA CE of any change in personal information in its application for registration as RFA under s28F of ACRA Act, or any personal information furnished under Para. 1, Part 1, First Sch, FA QI Regs within 14 days after the date of change.</p>		

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		<p><i>For Registered Qualified Individuals and supervisees:</i> An RQI must notify ACRA CE of any change in personal information furnished in his application for registration as RQI under s28G ACRA Act, or any personal information furnished under Para. 2, Second Sch, FA QI Regs, within 14 days after the date of change.</p> <p>An RQI who is, or who is employed, engaged or appointed by, an RFA must notify ACRA CE of any change in any personal information, of a supervisee.</p>		