



**Suruhanjaya Komunikasi dan Multimedia Malaysia**  
*Malaysian Communications and Multimedia Commission*  
MCMC HQ Tower 1, Jalan Impact, Cyber 6  
63000 Cyberjaya  
Selangor Darul Ehsan  
MALAYSIA

Reference No: MCMC(T)/CIRD/2025/007  
Date : Wednesday, 9 July 2025

**Mohamad Ezri bin Abdul Wahab**  
President  
Malaysian Bar  
2, Leboh Pasar Besar, City Centre  
50050 Kuala Lumpur  
Wilayah Persekutuan

Dear Sir,

## **CLARIFICATION ON THE MOBILE PHONE DATA INITIATIVE**

The Malaysian Communications and Multimedia Commission (MCMC) refers to the press statement issued by the Malaysian Bar on 25 June 2025 titled “Rebuilding the Public Trust Deficit with Regard to Personal Data Collection.” MCMC appreciates the Malaysian Bar’s commitment to privacy and data protection and welcomes the opportunity to clarify any misconceptions to ensure transparency and accuracy of information concerning the Mobile Phone Data (MPD) Initiative.

MCMC notes the concerns raised by the Malaysian Bar and wishes to highlight that misinformation regarding the MPD Initiative has largely stemmed from inaccurate media reports quoting anonymous industry sources.

MCMC recognises that public trust is paramount and is fully committed to addressing concerns transparently and responsibly. In this spirit, MCMC provides the following clarifications:

### **1. Nature of Data Collection**

From the outset, MCMC wishes to clarify that Mobile Network Operators (MNOs) were given two (2) options under the MPD Initiative to either:

- (a) process the data requested under the MPD Initiative within their own secured environment and only then submit the required data in the form of aggregated statistical output to MCMC; or
- (b) for MNOs without the in-house processing capabilities, submit anonymised data to MCMC for processing into the aggregated statistical output.

At the material time, all the MNOs have opted for option (a) which is to submit aggregated statistical output to MCMC without any data leaving the MNOs' secured environment, save for two (2) MNOs who opted for option (b), i.e., to provide anonymised data to MCMC, which is comparatively small in scale. MCMC wishes to emphasise that both types of data submitted under option (a), which is the aggregated statistical output and under option (b), which is anonymized data, do not involve any form of Personally Identifiable Information (PII). In any event, all the data presently being submitted to MCMC under the MPD Initiative is in the form of aggregated statistical output only as per option (a).

In response to the concerns raised by these inaccurate media reports, MCMC had issued a media statement on 6 June 2025<sup>1(a)</sup> refuting the allegation of collection of Personally Identifiable Information (PII) in the MPD Initiative and clarifying the actual scenario.

## **2. Transparency and Stakeholder Engagement**

On 9 June 2025, MCMC and the Department of Statistics Malaysia (DOSM) [*represented by Jamaliah Jaafar, Senior Director, National Big Data Analytics Centre (NBDAC)*] held a detailed media briefing<sup>1(b)</sup> attended by 30 local and international media representatives, as well as MNOs. During this media briefing session, MCMC answered each question by the media in relation to the data requested under the MPD Initiative by presenting cogent evidence of policy endorsement and mandate, purpose and use, data handling and privacy safeguards, and sample of data set with letters to the MNOs.

## **3. Compliance with the Personal Data Protection Act 2010**

Additionally, MCMC provided clarification that the data requested under the MPD Initiative is not personal data and shared the details of prior stakeholder engagements and capacity building during the aforesaid media briefing. Resulting from this, the relevant media had accordingly amended their reports by rectifying the inaccurate allegations about the data requested under the MPD Initiative.

In respect of the application of the Personal Data Protection Act 2010 (PDPA 2010), MCMC states that the data requested under the MPD Initiative is not 'personal data' within the meaning of Section 4 of the PDPA 2010, as the said data is not collected for any commercial transactions and most importantly does not involve any Personally Identifiable Information (PII).

MCMC wishes to emphasise that irrespective of whether the PDPA 2010 is applicable to statutory bodies or otherwise, the data requested under the MPD Initiative does not fall under the scope of the PDPA 2010. This has been confirmed explicitly by the Personal Data Protection Commissioner Office (JPDP) prior to the implementation of the MPD Initiative. On 7 July 2025, MCMC received further confirmation from JPDP based on the Personal Data Protection (Amendment) Act 2024, that data requested under the MPD initiative does not involve the collection of Personally Identifiable Information (PII)<sup>2</sup>.

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<sup>1(a)</sup> *Media Statement – MCMC Clarifies On Collection Of Mobile Phone Data For Statistical Purposes*  
(<https://www.mcmc.gov.my/en/media/press-releases/mcmc-clarifies-on-collection-of-mobile-phone-data>)

<sup>1(b)</sup> *Media Briefing MPD Coverage – 10 June 2025*

([https://docs.google.com/document/d/14OgHT\\_DCEd4oa4e0nr3nU1jDjaHLzbCgPyeVpSA2ymk/edit?usp=sharing](https://docs.google.com/document/d/14OgHT_DCEd4oa4e0nr3nU1jDjaHLzbCgPyeVpSA2ymk/edit?usp=sharing))

<sup>2</sup> *JPDP's Official Letter to MCMC, 7 July 2025*

([https://docs.google.com/document/d/1JEOK3wUgRmxujsdAaeAZBkCYfoJviz\\_W4RSdb9YAheO/edit?tab=t.0](https://docs.google.com/document/d/1JEOK3wUgRmxujsdAaeAZBkCYfoJviz_W4RSdb9YAheO/edit?tab=t.0))

#### **4. Privacy Safeguards and Risk Management**

MCMC acknowledges public concerns regarding the potential privacy risks associated with the use of aggregated mobility data. MCMC reiterates that at the material time, all data submitted by MNOs to MCMC are confined to aggregated statistical output and anonymized data without any form of Personally Identifiable Information (PII). This process is similar to existing data collection practices used for network performance statistics, such as call-drop rates, which do not involve individual-level information. It is rest assured that robust safeguards and strict internal oversight procedures remain in place. MCMC also remains open to independent reviews or third-party audits to provide additional assurance to the public.

#### **5. Collaboration and International Standards**

Further, experts<sup>3</sup> have confirmed that the data requested under the MPD Initiative only involves aggregated anonymised data and does not involve Personally Identifiable Information (PII). The MPD Initiative was developed through extensive consultations with industry experts, MNOs and respected international bodies, including the International Telecommunication Union (ITU) and the United Nations Committee of Experts on Big Data and Data Science for Official Statistics<sup>4</sup>, further ensuring alignment with global best practices.

#### **6. Fundamental Liberties and Broader Privacy Concerns**

In respect of fundamental liberties under Article 5(1) of the Federal Constitution including right to privacy, MCMC supports the Malaysian Bar's concern on the need to protect privacy of public data in accordance with the law.

However, MCMC is especially concerned with the serious risks to data privacy in cases where Personally Identifiable Information (PII) is collected by some digital services providers, social media platforms and internet messaging services by stipulating a condition that a user or subscriber must agree to not only give up their Personally Identifiable Information (PII) but to allow the said data to be provided or marketed to unknown third parties. In the event a user does not wish to consent, the user is not allowed to use the service or platform. In such a situation and due to today's rapidly evolving digital world, where such services are akin to necessary utilities, the public has no real option but to give their consent to surrender their Personally Identifiable Information (PII), with the danger of such data being sold or given to unknown or unscrupulous third parties.

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<sup>3</sup> *Program Data Telefon Bimbit Bantu Nilai Prestasi Rangkaian Negara* (<https://www.sinarharian.com.my/article/735754/berita/nasional/program-data-telefon-bimbit-bantu-nilai-prestasi-rangkaian-negara>) (<https://bernama.com/en/thoughts/news.php?id=2438250#abc>) (<https://www.bernama.com/en/thoughts/news.php?id=2438271#abc>)

<sup>4</sup> *UN Big Data Task Team, Mobile Phone Data* (<https://unstats.un.org/bigdata/task-teams/mobile-phone/index.cshhtml>)

## 7. Commitment to Accountability

In respect of the MPD Initiative, it is clear from the media statements<sup>5</sup> issued by the MNOs that the data provided to MCMC are only aggregated statistical output and anonymised data without any form of Personally Identifiable Information (PII). Since no Personally Identifiable Information (PII) is shared with MCMC, there is no individual participation involved and therefore, no exposure to opt out. This process is similar to how MNOs compile national call drop statistics. This has been done without accessing or disclosing anyone's personal call details. In the same way, the MPD Initiative is about generating statistics, not tracking individual people.

MCMC reassures the public and all stakeholders, including the Malaysian Bar, that the implementation of the MPD Initiative adheres strictly to all applicable laws, principles of good governance, accountability and ethical conduct, consistent with the Cabinet's decision and the standards set forth by DOSM.

Please let us know when you might be open to have an engagement to discuss the aforesaid should you require the same. MCMC remains firmly committed to transparency, openness to stakeholder feedback and to continuously enhancing public trust in all our regulatory actions.

We will publish this letter to you at our website [www.mcmc.gov.my](http://www.mcmc.gov.my).

Thank you

Yours faithfully,



**DATUK ZURKARNAIN MOHD YASIN**  
Deputy Managing Director  
On Behalf of the Chairman

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<sup>5</sup> *MNOs media statements*

CD: <https://corporate.celcomdigi.com/news/celcomdigi-commitment-to-secure-and-responsible-customer-data-protection>

Maxis: <https://www.maxis.com.my/en/about-maxis/newsroom/2025/june/maxis-media-statement-on-mobile-phone-data-initiative>

TM: [https://www.tm.com.my/news/submission\\_of\\_mobile\\_phone\\_data\\_mcmc](https://www.tm.com.my/news/submission_of_mobile_phone_data_mcmc)

UMobile: <https://www.u.com.my/en/about-us/newsroom/press-releases/lu-mobile-s-statement-on-mcmc-s-mobile-phone-data-initiative>

YES: <https://www.facebook.com/Yes.5G/posts/pfbid0249dPkSpQuyYfYt7niZ6DyMnHgx93jgtGwsscLi3b399p7MsueRfgqYTpqyNeRyUuPl>