



Deloitte Thailand's PDPA Readiness Survey

How organisations across industries have responded to the upcoming enforcement of the Thailand Personal Data Protection Act B.E. 2562



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With the increased collection and use of personal data, management and privacy of data is a growing concern for businesses across all sectors. More importantly, the introduction of the Thailand Personal Data Protection Act B.E.2562, "Thai PDPA", will officially come into affect in June 2022 after being postponed. This will change the privacy landscape for businesses dramatically.

In October 2021, Deloitte Thailand conducted a Thai PDPA readiness survey across a sample of organizations and industries in Thailand. The aim of this survey was to understand how organizations are preparing for Thailand's PDPA compliance, how far along their implementation plans are and what challenges they may be facing along the way.

The results of the survey indicate that industries are differing in their implementation speed and timeline of compliance activities, with Financial Services leading the way to be ready in time for June 2022. The top motivators for Thai PDPA compliance activities were driven by PDPA regulations and negative consequences of not adopting these regulations, rather than associated benefits. Integrating new policies and processes into business operations was the top challenge across all industries.

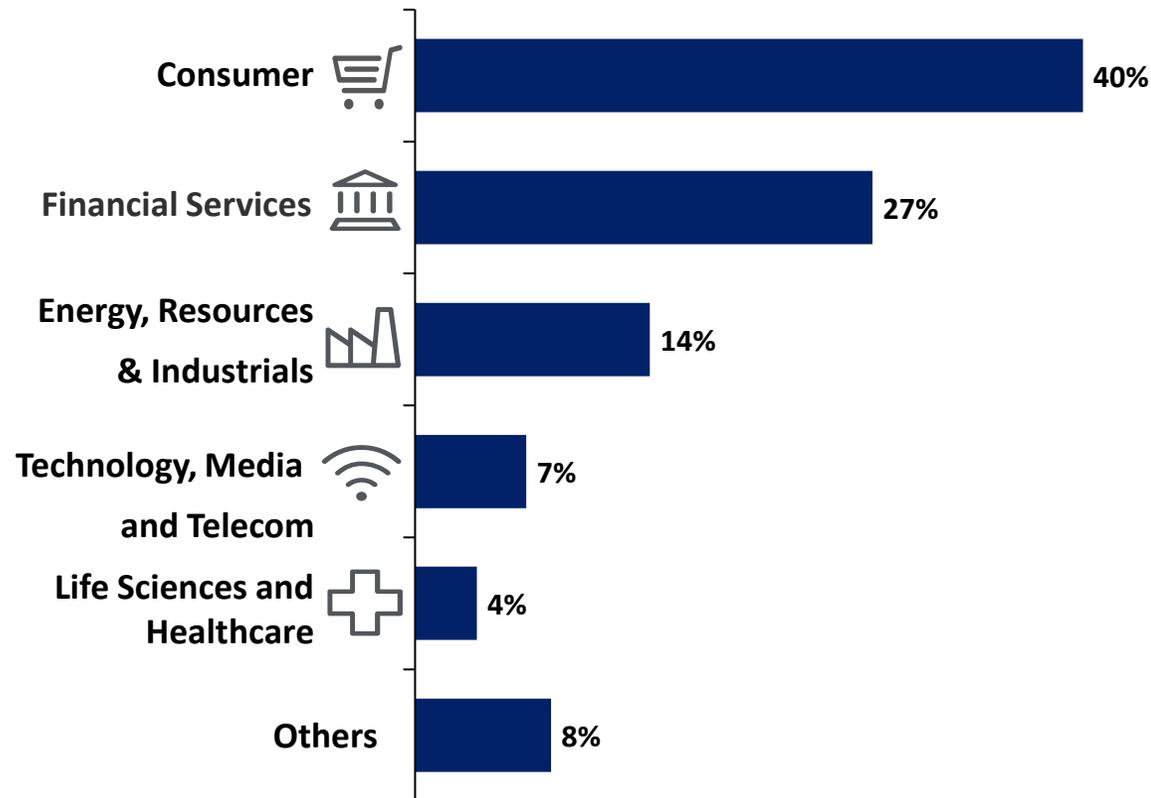


Survey respondent profile

40% of the survey respondents came from the Consumer industry, followed by Financial Services, accounting for 27%. The majority of respondents came from larger sized companies, with a head count of 500 employees and above.

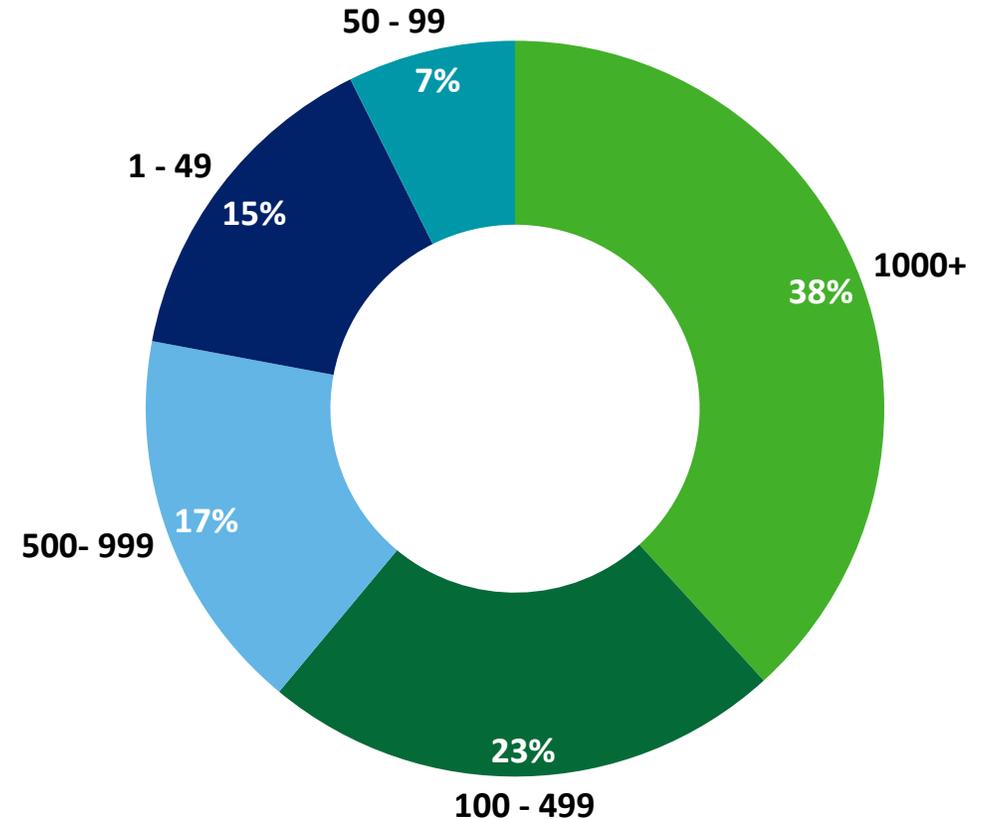
Industry of respondents

(% of respondents, n=136)



Organization size (by headcount)

(% of respondents, n=136)

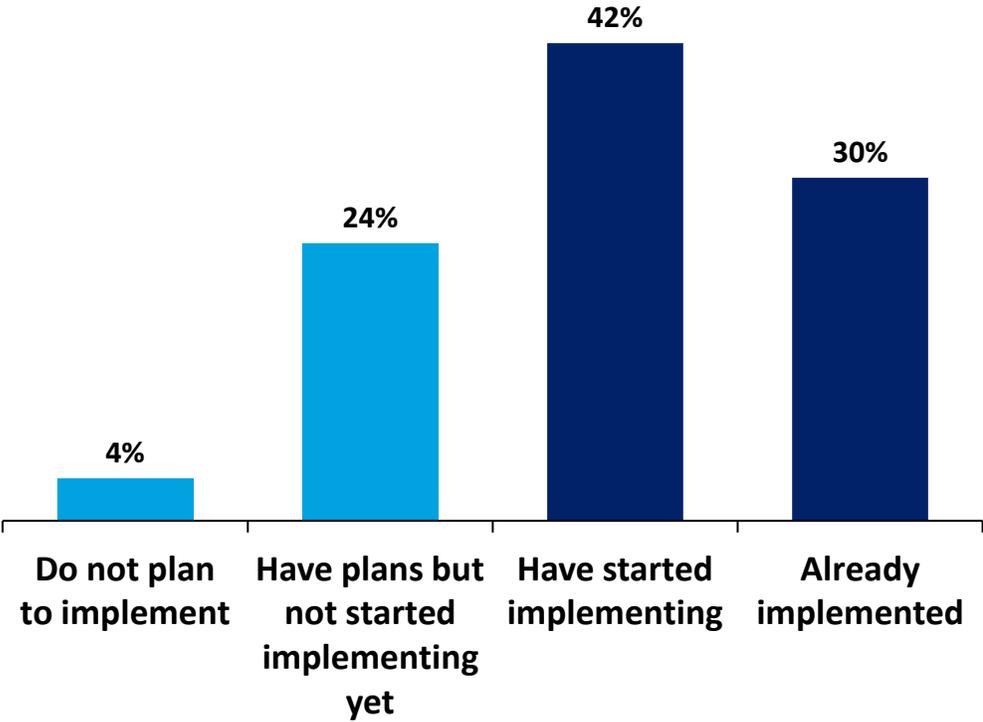


PDPA implementation status varies across industries

72% of respondents have started or already implemented Thai PDPA requirements, whereas 24% have plans but have not started the implementation process yet. By Industry, Financial Services had the largest percentage of respondents who have already started, or implemented Thai PDPA requirements already, followed by Life Sciences and Health care. The industry with the highest percentage of those who have not stated the implementation process is Energy, Resources & Industrials.

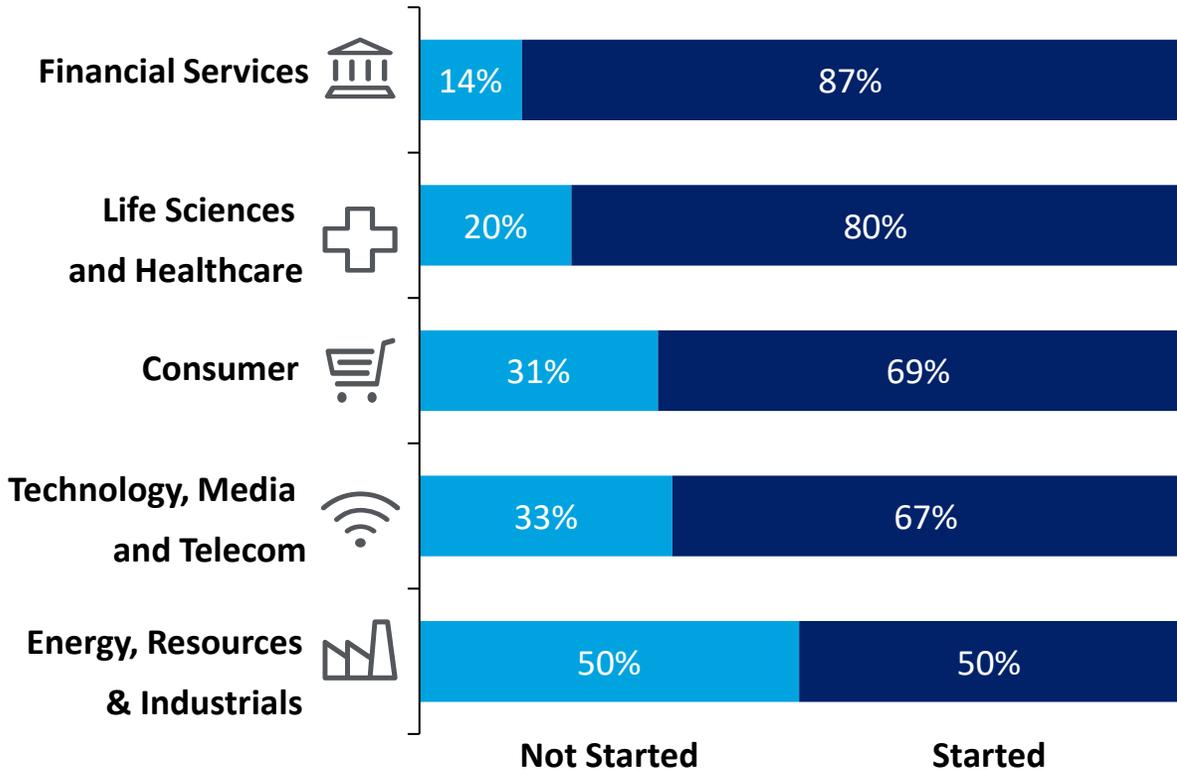
Thai PDPA implementation status

(% of respondents, n=136)



Thai PDPA implementation status by industry

(% of respondents, n=120, excluding 'Others')

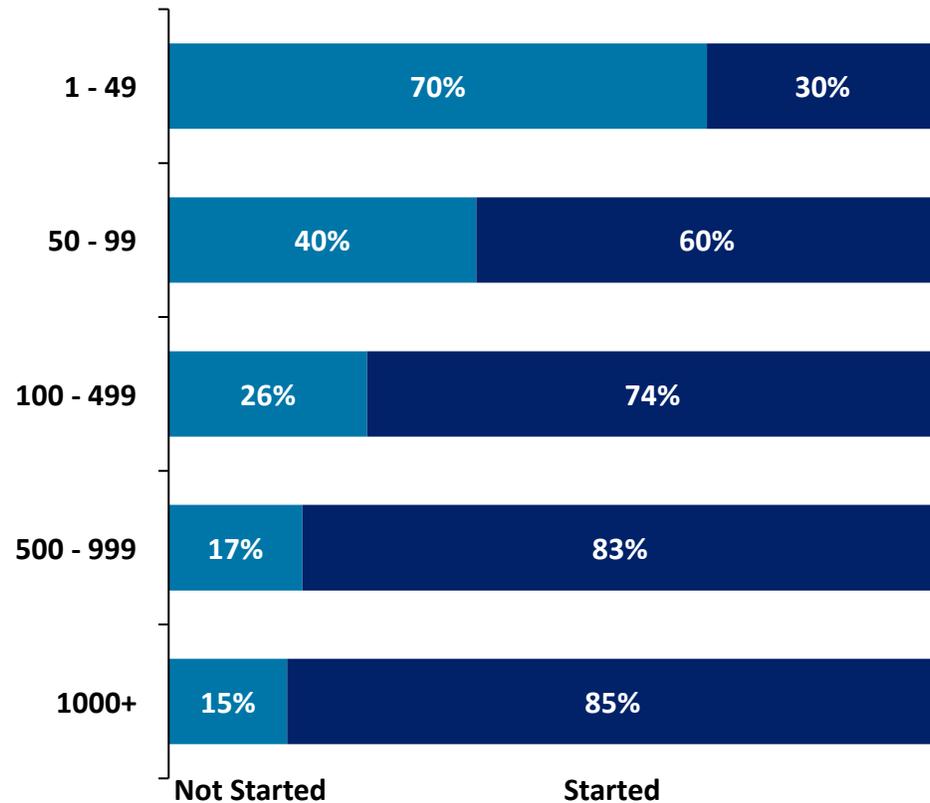


Thai PDPA implementation status varies depending upon company size

Survey response indicates that the majority of organizations that have started or already implemented Thailand’s PDPA requirements, are larger with at least 100 employees, whereas more than half of the respondents from smaller organizations with less than 50 employees stated that they have plans but have not started implementing yet.

Thai PDPA implementation status by organization size

(% of respondents, n=136)

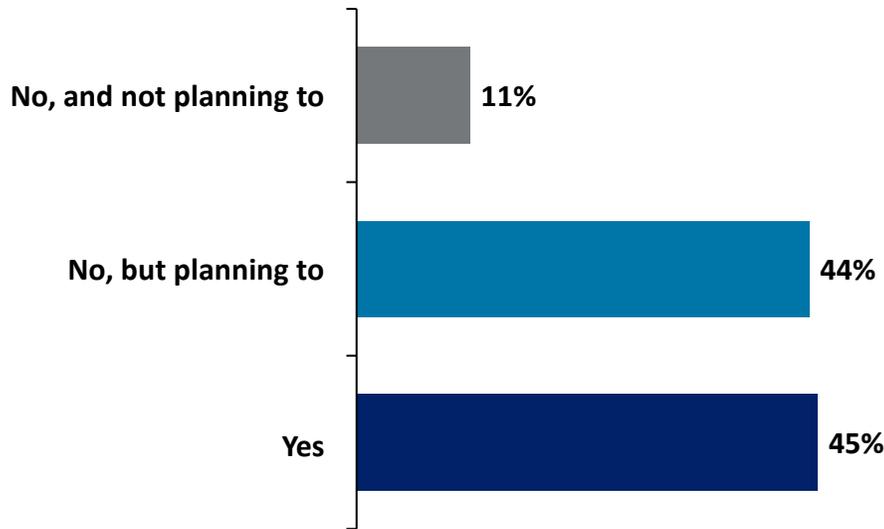


Most organizations plan to, or have already performed a Thai PDPA readiness assessment

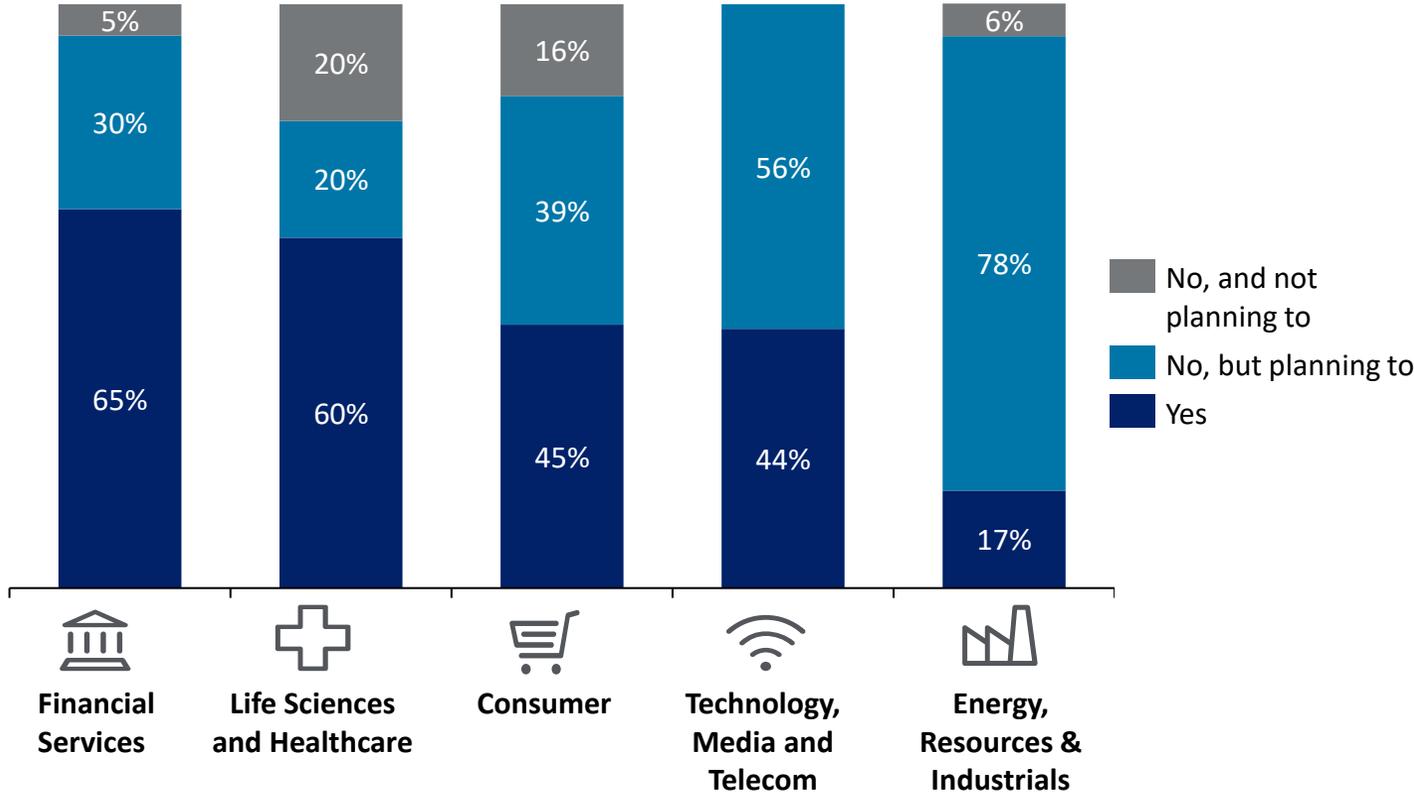
Of the 45% of respondents who had already conducted a Thai PDPA readiness assessment, 98% of the assessments included readiness of IT systems as well as business processes and operations. Both Financial Services and Life Sciences and Healthcare had a higher percentage of respondents who have already performed a Thai PDPA readiness assessment.

Conducting Thai PDPA readiness assessment

(% of respondents, n=136)



(% of respondents, n=120, excluding 'Others')

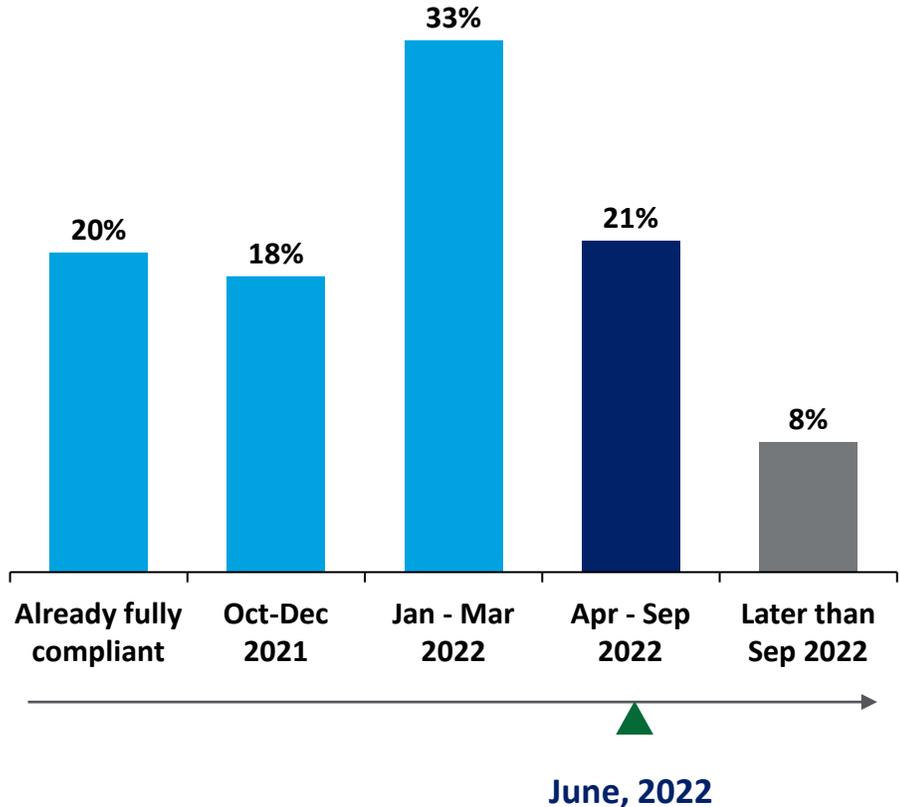


Compliance timeline

Only 29% of the respondents indicated that they may not be fully compliant around the enforcement deadline of June 2022, with 8% of those expecting to be fully compliant much later in the year. Results show that most of the respondents in the Consumer, Financial Services and Technology, Media and Telecom industries will be fully compliant by June 2022, whereas the Energy, Resources and Industrials, and Life Sciences and Healthcare sector seem to be lagging.

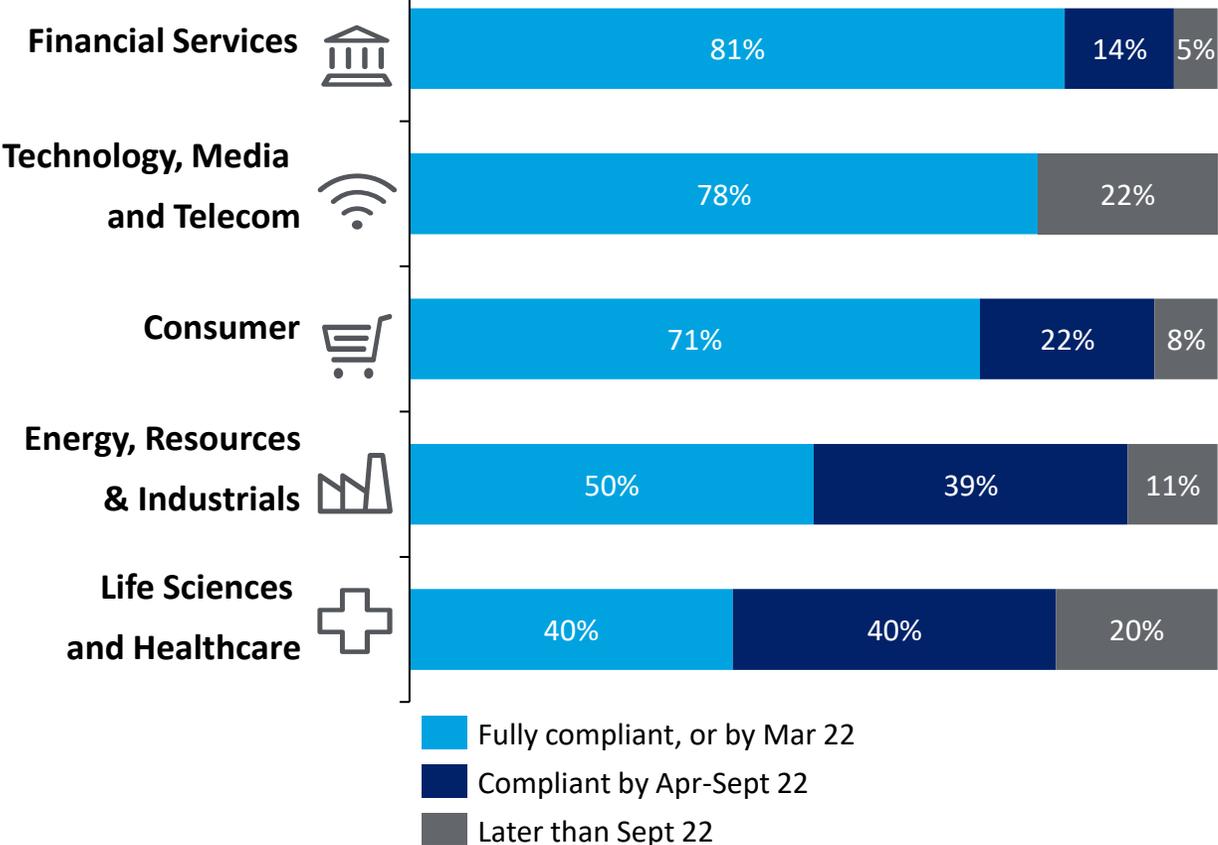
Timeline of expected compliance

(% of respondents, n=136)



Timeline of expected compliance by industry

(% of respondents, n=120, excluding 'Others')

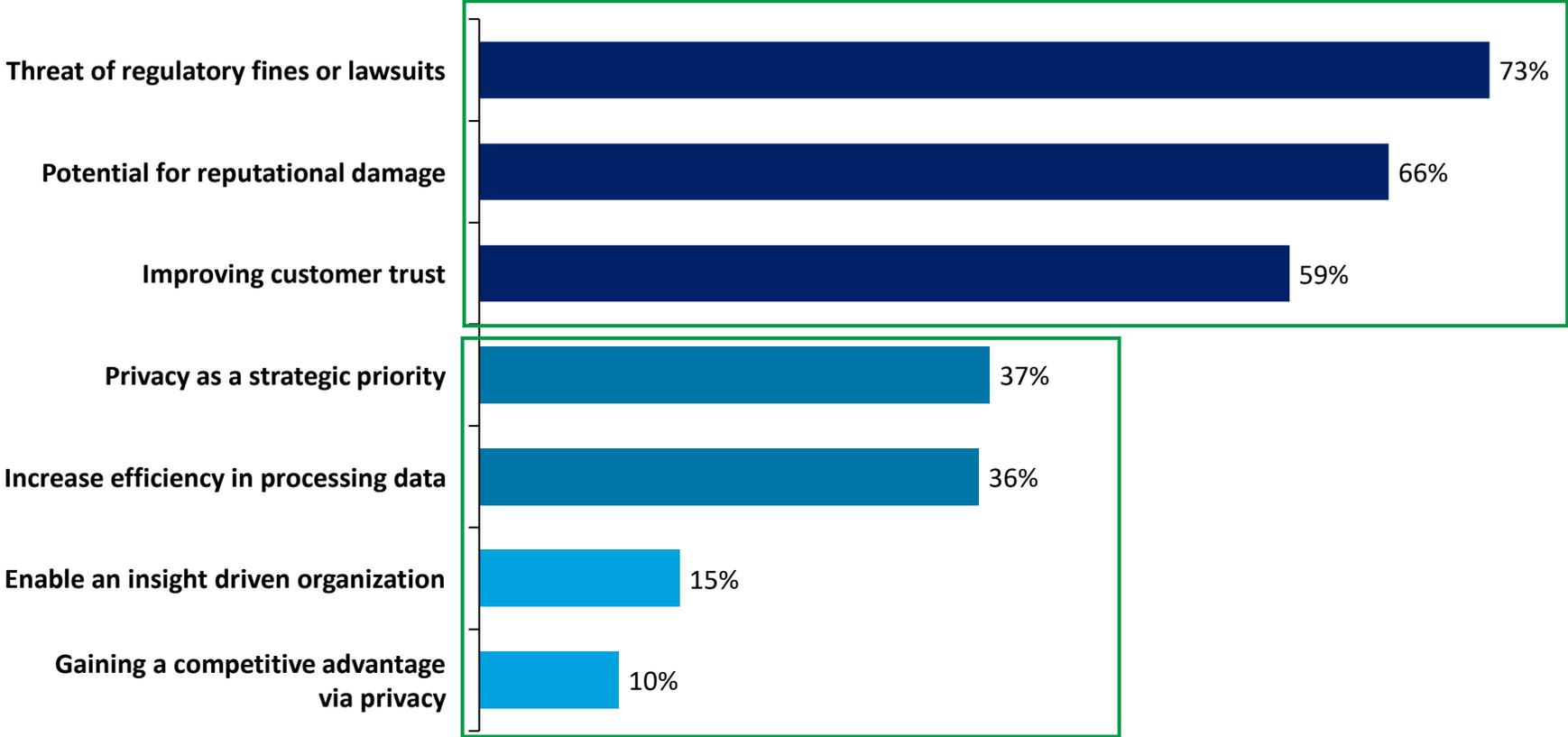


Key drivers for Thailand's PDPA compliance activities

The top 3 key drivers for compliance activities were consistent across all sectors, being threat of regulatory fines or lawsuits, potential for reputational damage and improving customer trust

Importance of Thai PDPA compliance activities

(% of respondents, n=136)



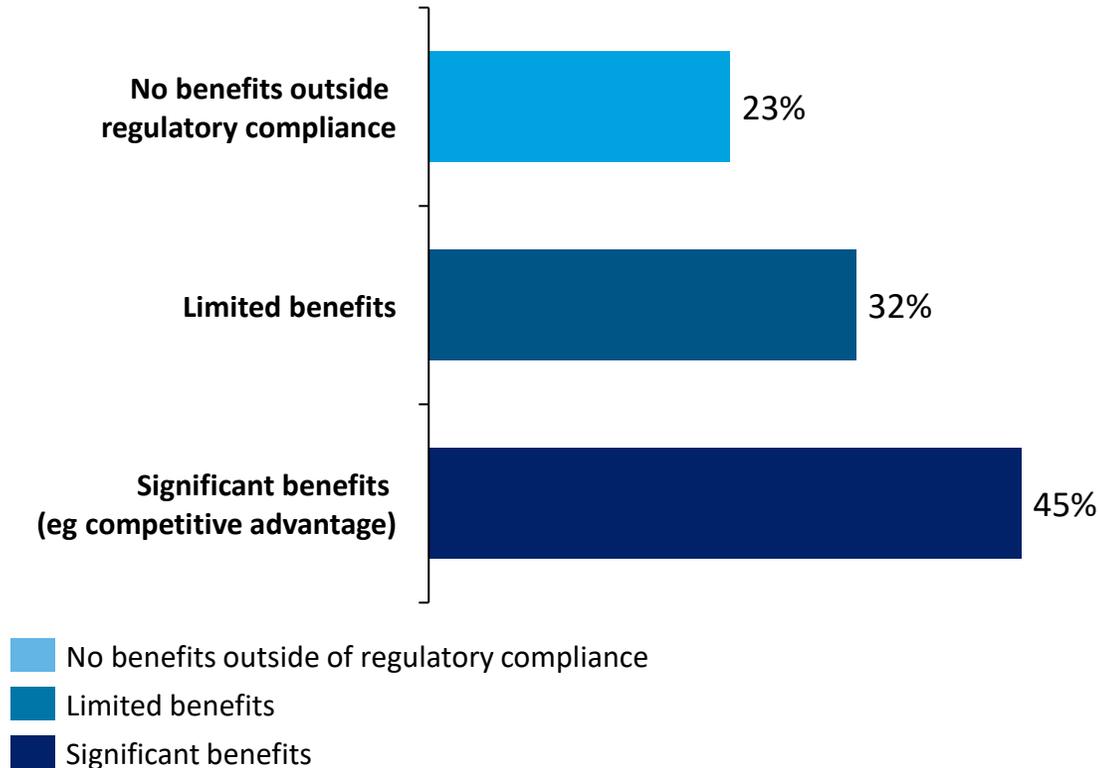
The top 3 drivers for Thailand's PDPA compliance activities were mainly regulation driven, and if not prioritized could have negative ramifications. Whereas the bottom 4 drivers are lead by positive motivations and benefits of PDPA compliance.

Almost half of the respondents expect significant benefits from Thai PDPA compliance

A higher proportion of Technology, Media and Telecom organizations and Energy, Resources & Industrial expect significant benefits from Thai PDPA compliance activities compared to other industries. Financial Services and Life Sciences and Health Care expect more limited or no benefits outside regulatory compliance, as these industries are highly regulated and the nature of the data they are dealing with is more sensitive.

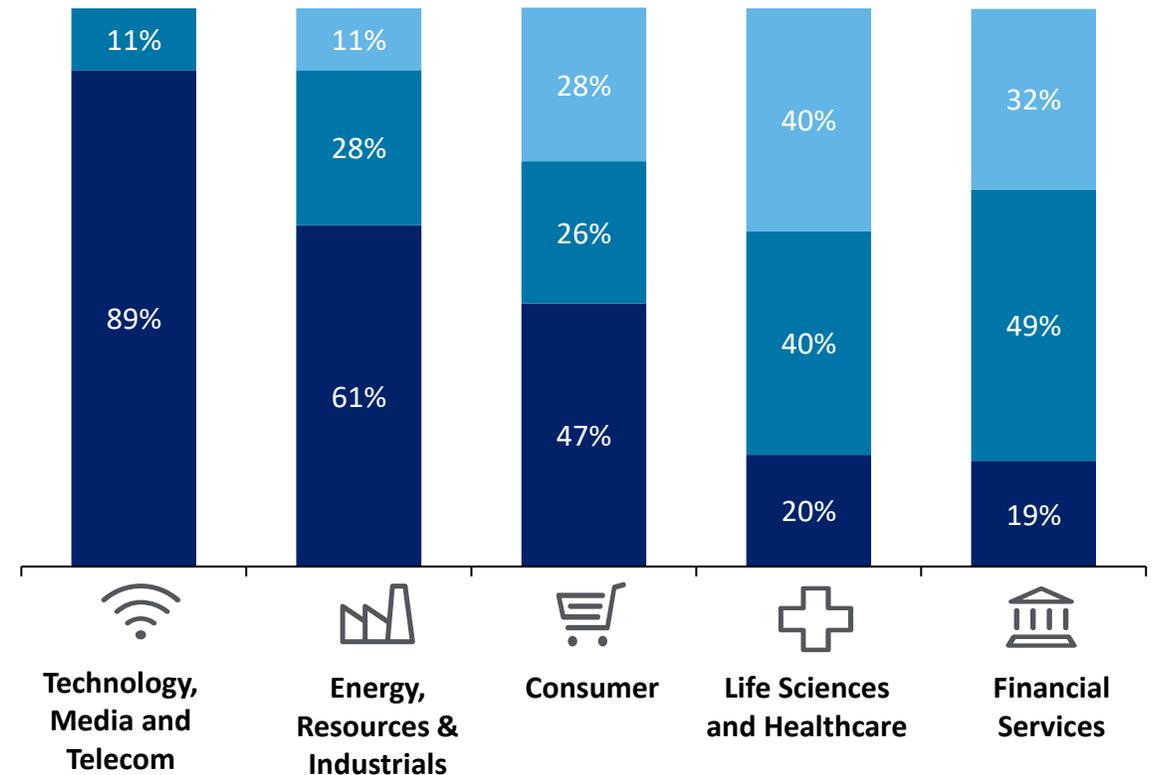
Thai PDPA Compliance Benefits

(% of respondents, n=136)



Benefits by Industry

(% of respondents, n=120, excluding 'Others')



Main areas of budget allocation for Thai PDPA compliance activities

(% of respondents, n=136)



Areas of budget allocation by industry

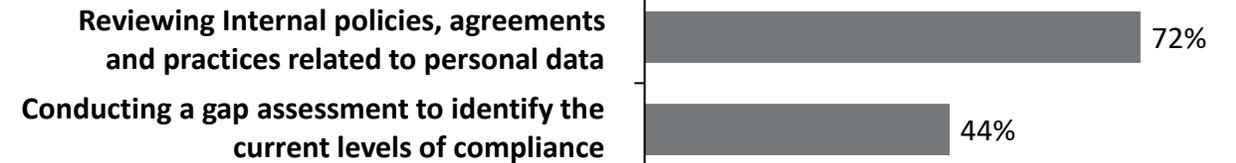
(% of respondents, n=120, excluding 'Others')



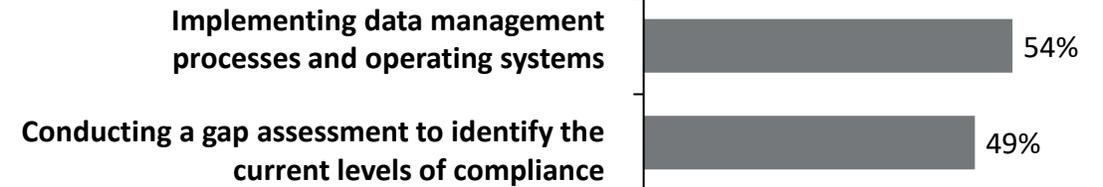
Consumer



Energy, Resources & Industrials



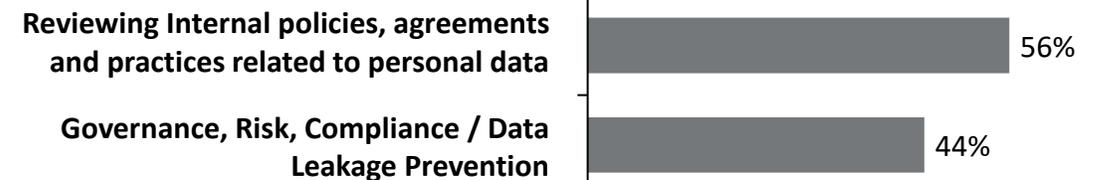
Financial Services



Life Sciences and Healthcare



Technology, Media and Telecom

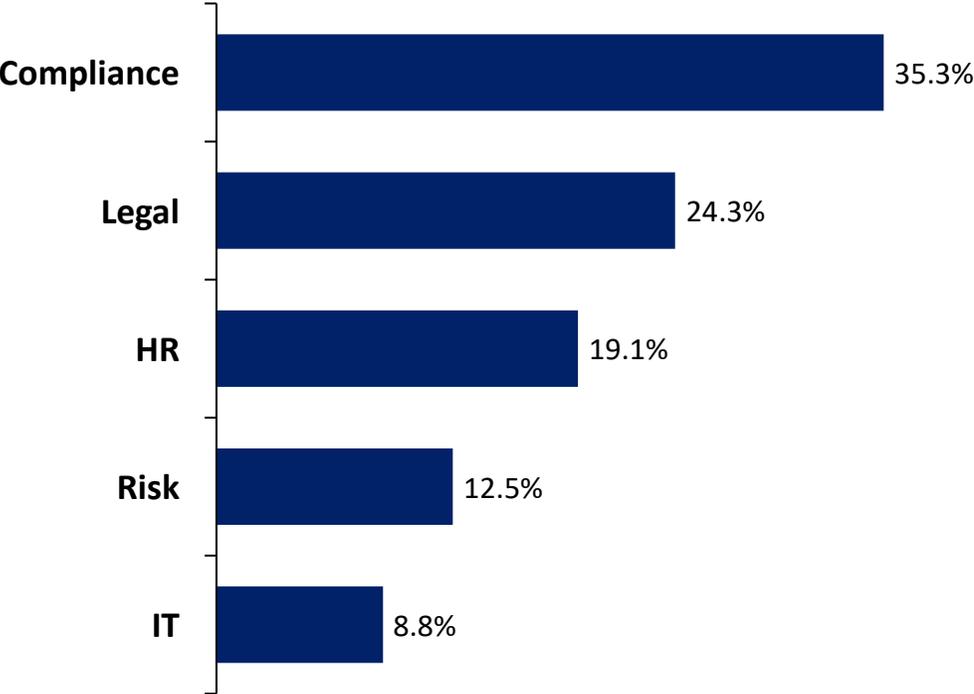


Leading function in Thai PDPA programs and compliance activities

Compliance was the leading function for Thai PDPA activities for all industries apart from Energy, Resources & Industrials, where HR was the leading function. The chosen function overseeing PDPA compliance activities suggests a link to the nature of business activities of the organization, and whether they are primarily dealing with internal data (B2B) or external data (B2C).

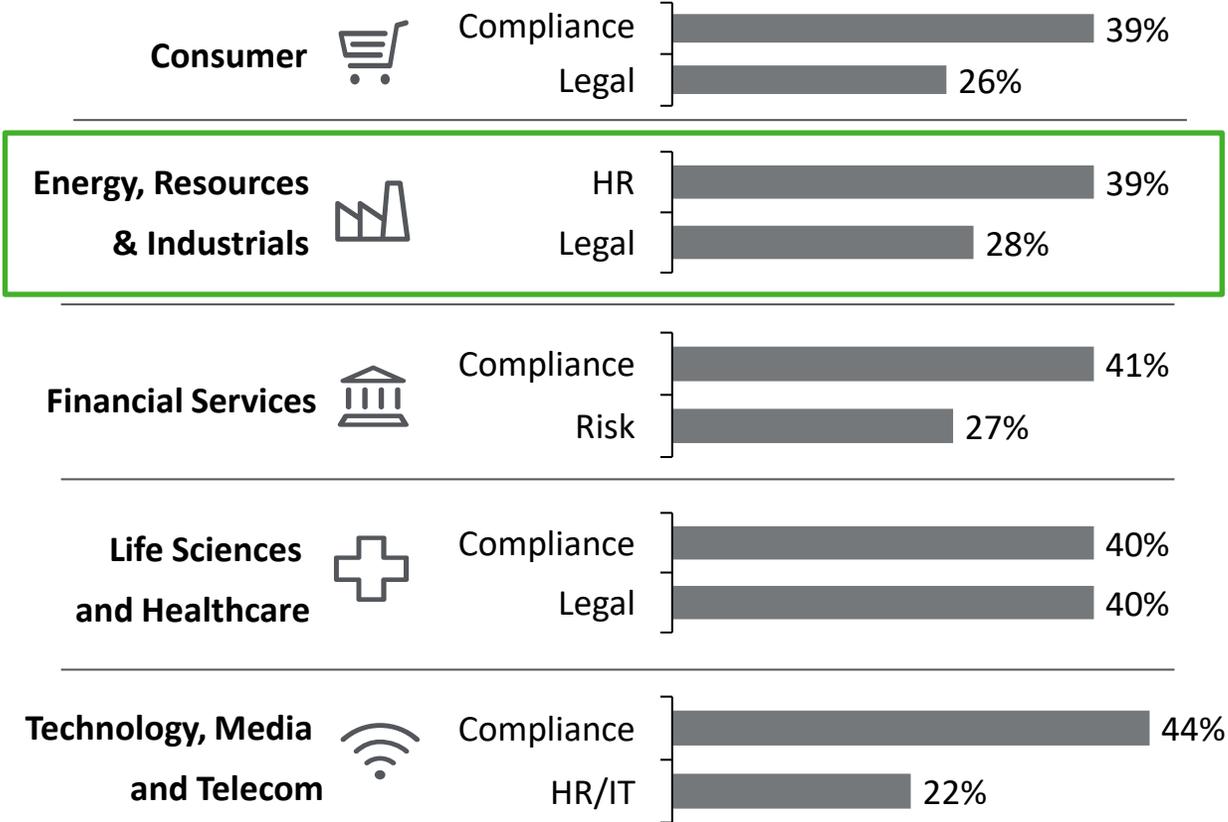
Leading function

(% of respondents, n=136)



Leading function by industry

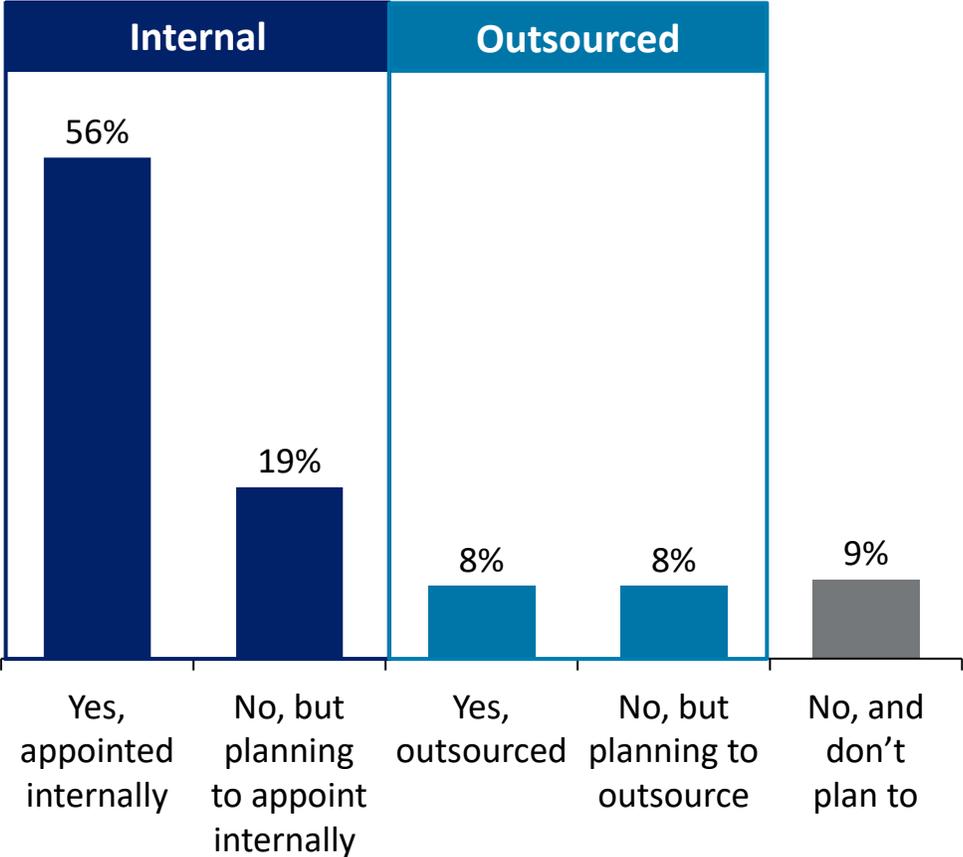
(% of respondents, n=120, excluding 'Others')



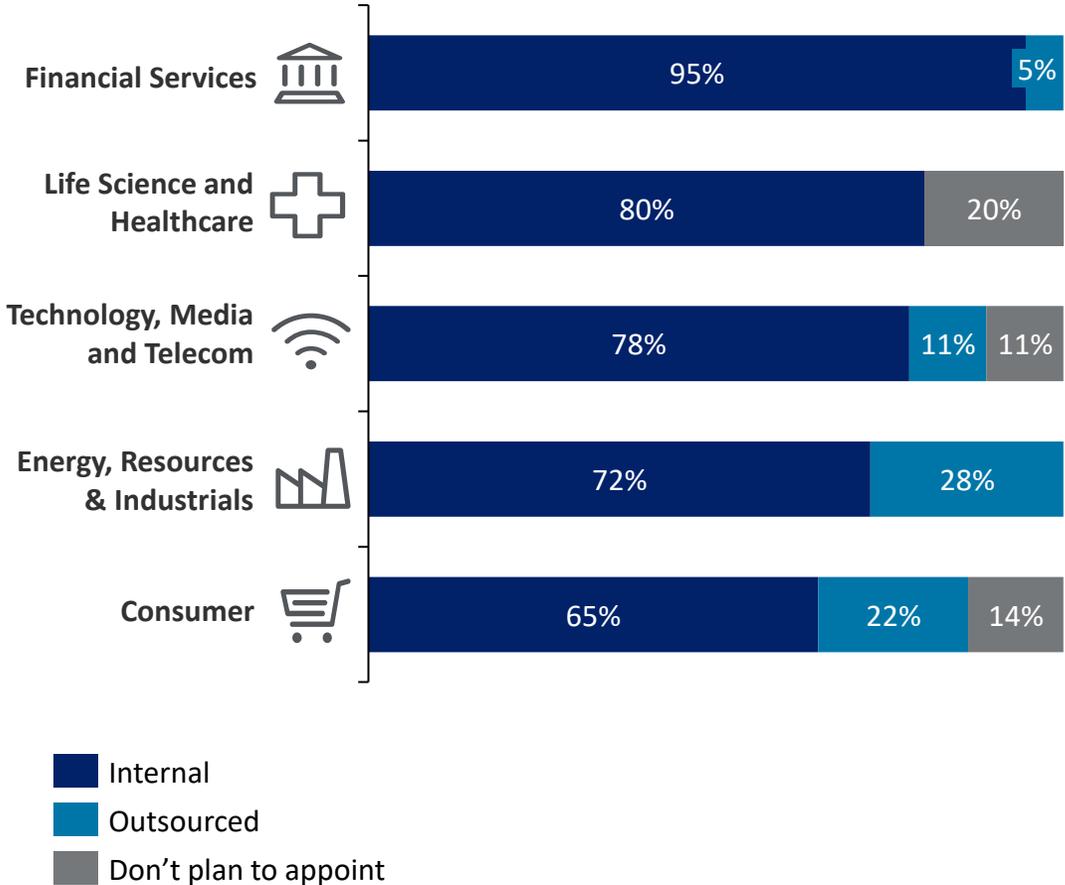
Appointing a Data Protection Officer (DPO)

Majority of respondents indicated that a Data Protection Officer (DPO) will be or already has been appointed internally, compared to outsourcing.

(% of respondents, n=136)



(% of respondents, n=120, excluding 'Others')



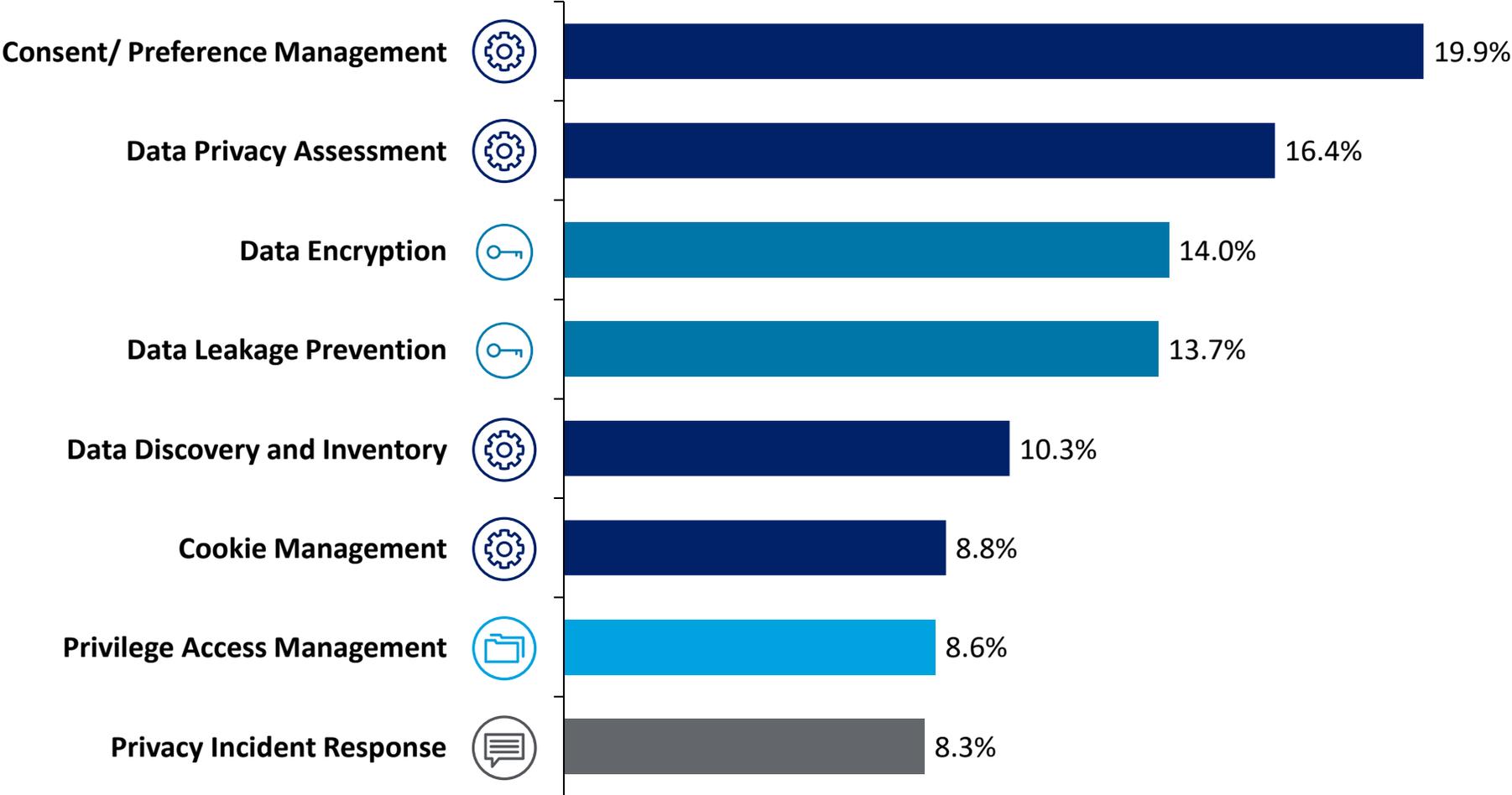
Investment in tools and technologies

The top 3 tools and technologies that organizations have invested in for Thai PDPA compliance activities include consent/preference management, data privacy assessments, and data encryption.

(% of respondents, n=136)

Technology type

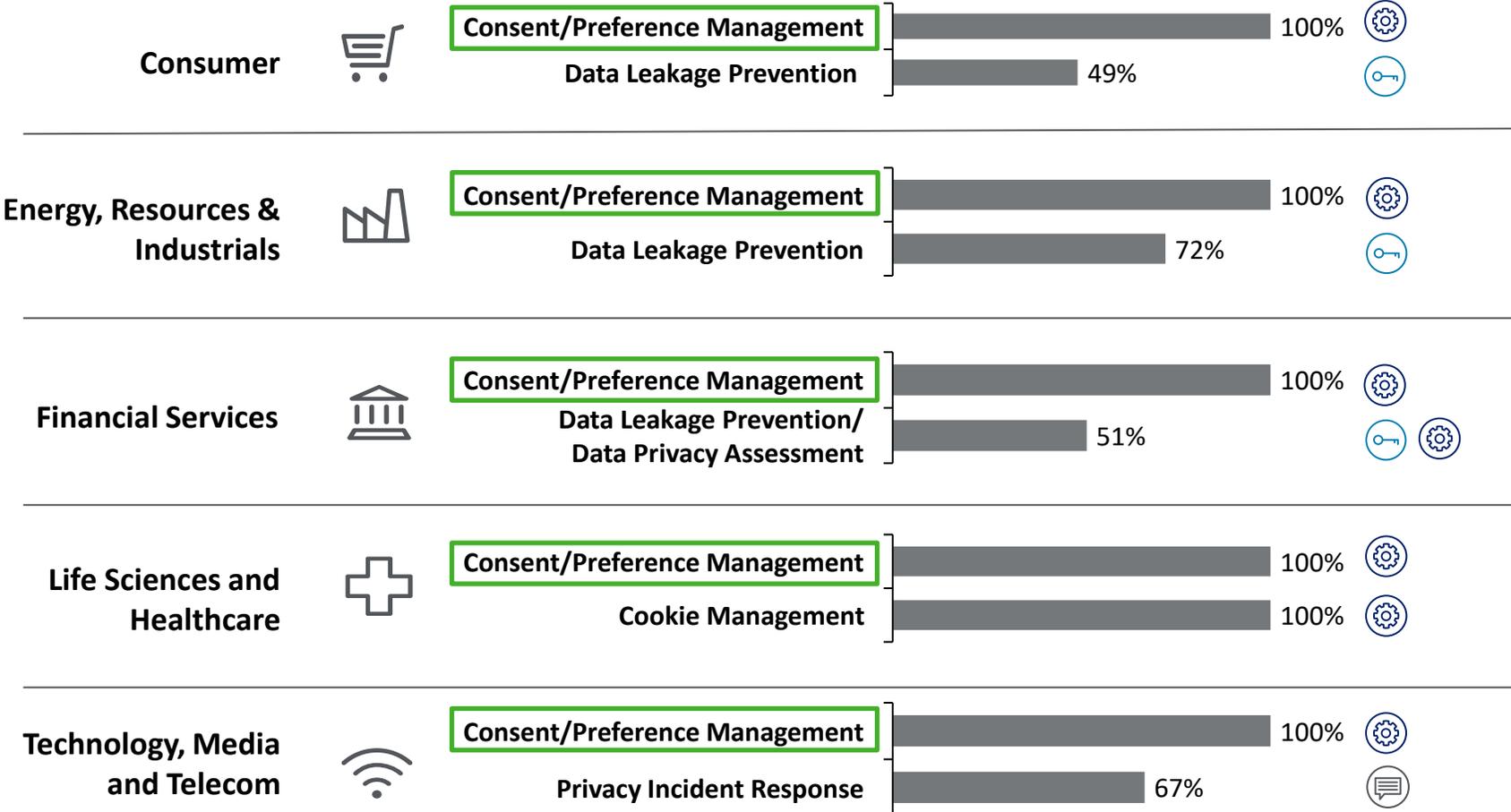
-  PDPA Technology
-  Protection/Security
-  Access Control
-  Response



Investment in tools and technologies by industry

(% of respondents, n=120, excluding 'Others')

For all industries, the top investment was in tools for consent and preference management. For Consumer, Energy, Resources & Industrials, and Financial Services, the second was for data leakage prevention tools. Top investment priorities were aligned with the core Thai PDPA requirements.

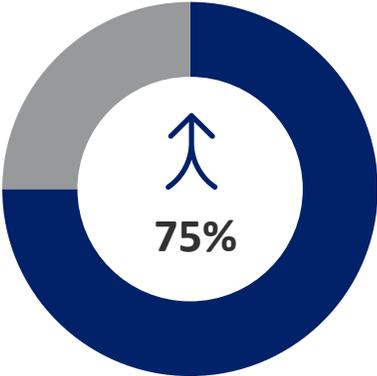


-  PDPA Technology
-  Protection/Security
-  Access Control
-  Response

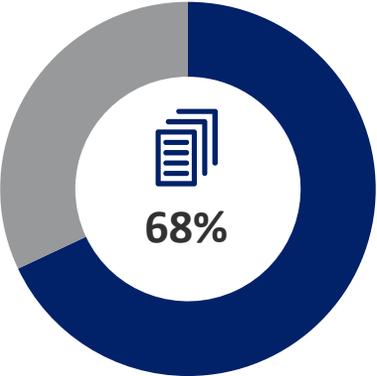
Implementation Challenges

Top challenges faced during Thai PDPA implementation

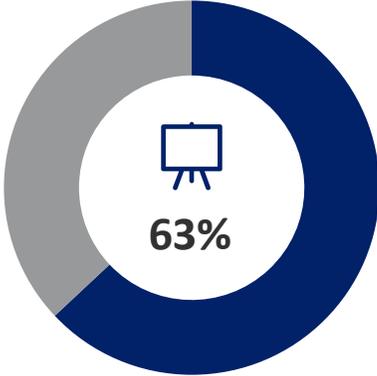
(% of respondents, n=136)



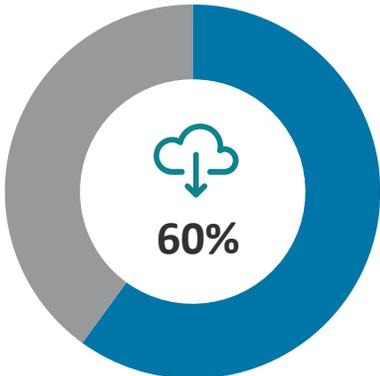
Integrating new policies and processes into business operations



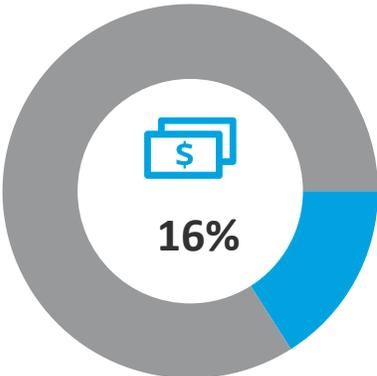
Interpreting PDPA requirements



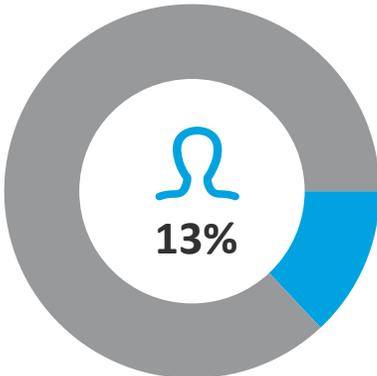
Staff knowledge



Implementing new technology



Budget allocation

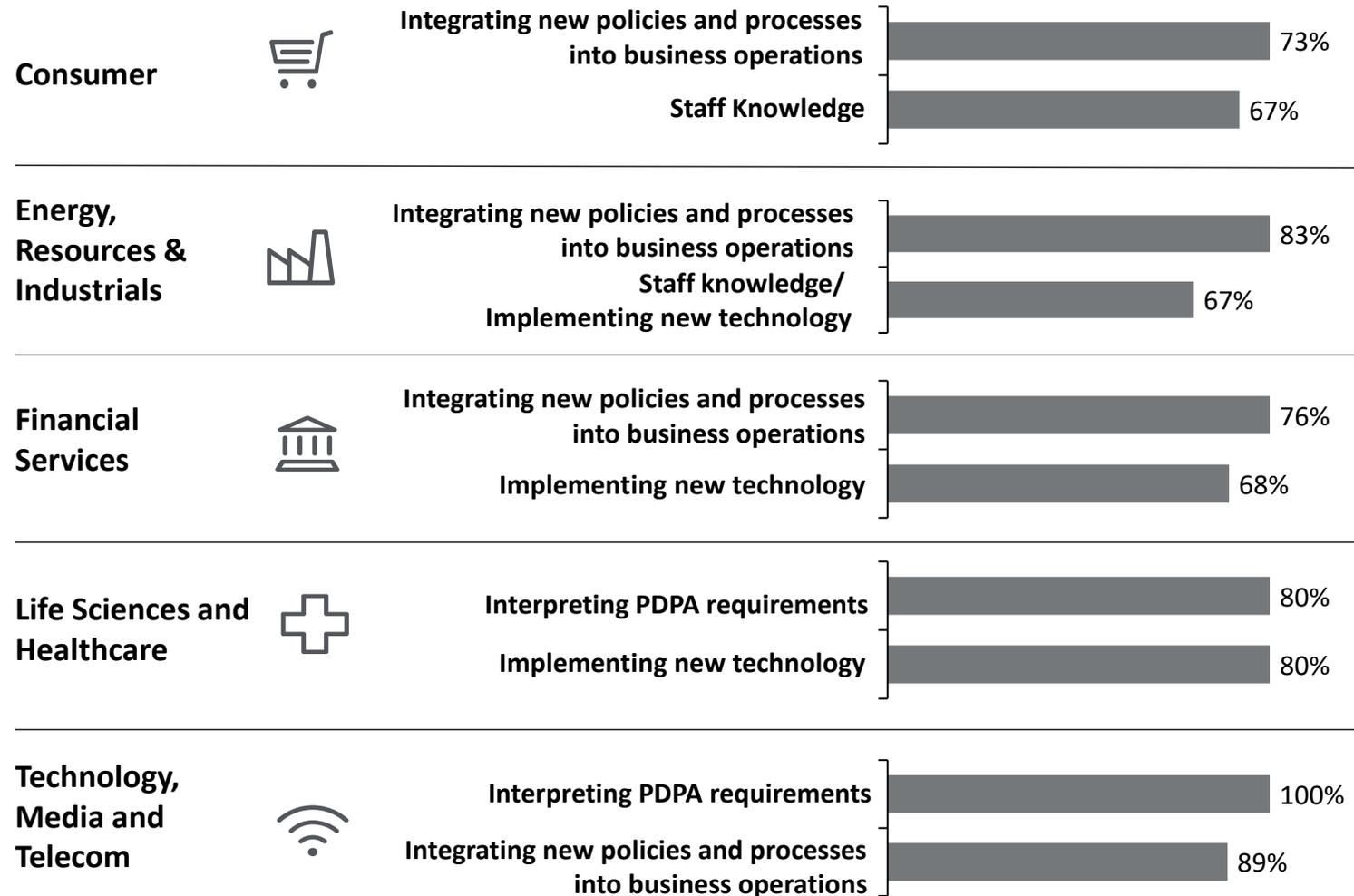


Staff availability

Top Challenges by Industry

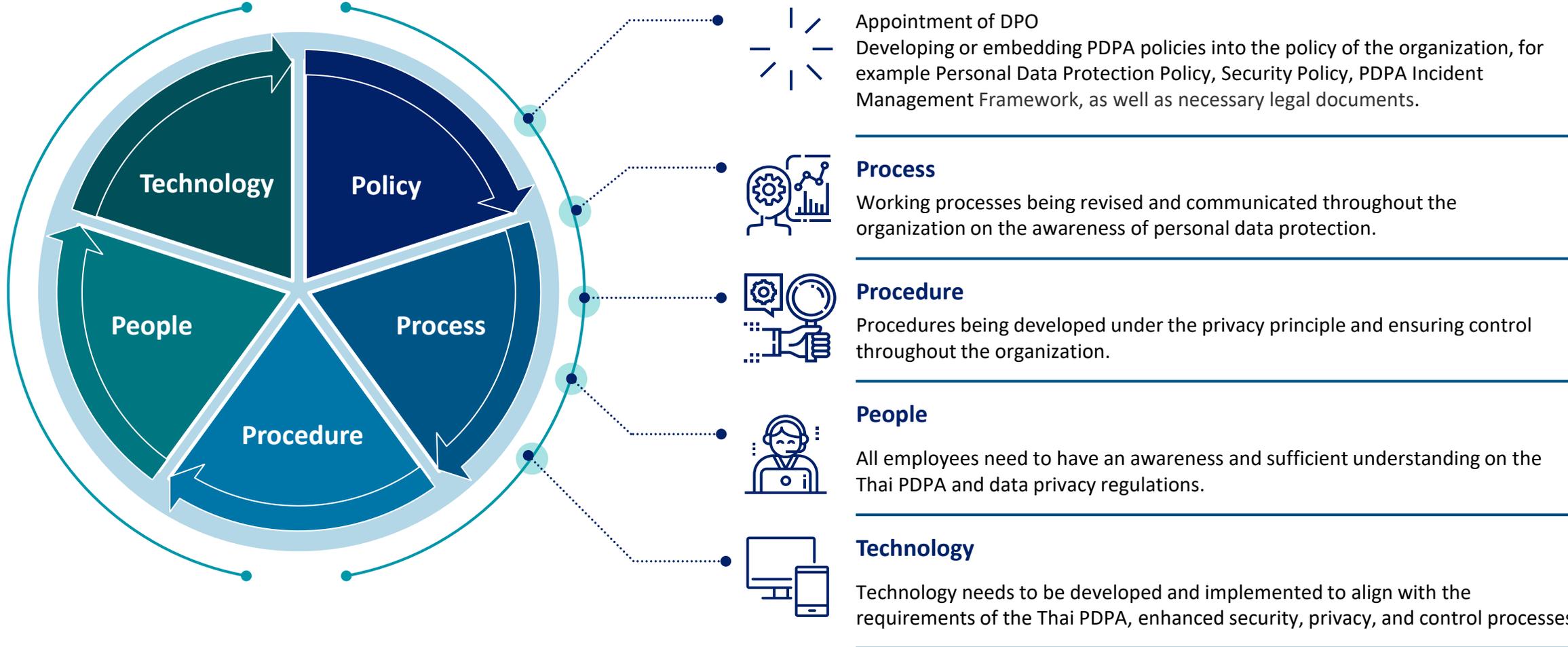
Integrating new policies and processes into business operations was one of the top challenges for almost all industries. For Life Sciences and Healthcare, the top challenge was interpretation of Thai PDPA requirements.

(% of respondents, n=120, excluding 'Others')



Our Holistic PDPA Approach

Deloitte encompasses an integrated approach for the Thai PDPA compliance journey. With a holistic point of view, Deloitte is able to combine Technology, Legal, Compliance and Organization workstreams to offer deeper insights and provide an end-to-end service from initiation and gap assessment, through to the implementation and post-implementation processes.





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