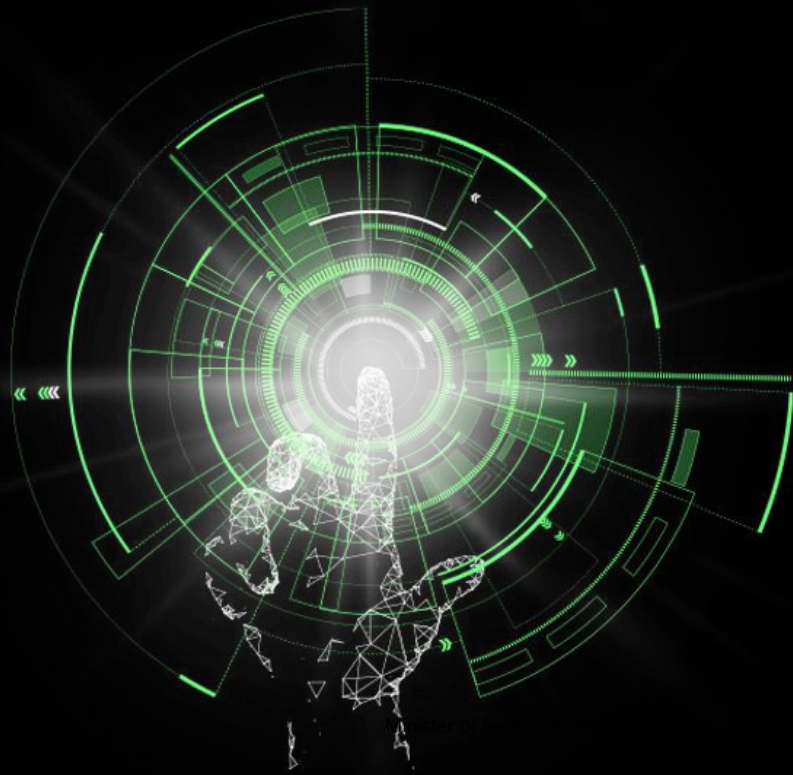


Data Protection & Privacy

From compliance to
growth



Why data protection matters?

Emerging threats in the environment indicate significant threats to data security, integrity, and availability which requires organizations to take prompt acts. On that account, decree No. 13/2023/ND on Protection of Personal Data (“PDPD”) issued by the Ministry of Public Security takes effect from July 1st, 2023. Accordingly, all Vietnamese and foreign entities that process the personal data of Vietnamese citizens or foreign individuals residing in Vietnam are required to implement management and technical measures protecting the personal data of employees and clients/customers.

Organizations who fail to comply with PDPD might be subject to disciplinary, administrative or criminal penalty in accordance with applicable regulations. In addition, monetary fines will take effect under the upcoming Cybersecurity Administrative Sanctions Decree (CASD).

Overview of the PDPD principles

Lawfulness

Only process personal data in accordance with applicable regulations of the law

Accountability

Demonstrate compliance with the principles of personal data processing

Purpose Limitation

Only process personal data for the purposes registered and announced

Data Subject Rights

Upon request, individuals should be able to demonstrate their data subject rights.

Data Minimisation

Collection of personal data must be appropriate and limited to the scope and purposes of processing

Integrity and Confidentiality

Ensure that personal data protected during processing by using technical measures



Transparency

Ensure that data subjects are aware of any operations relating to the processing of their personal data

Transfer Limitation

Transfer personal data to another country only in compliance with regulatory requirements of both nations

Accuracy

Ensure that personal data is updated and supplemented in accordance with the purpose of processing

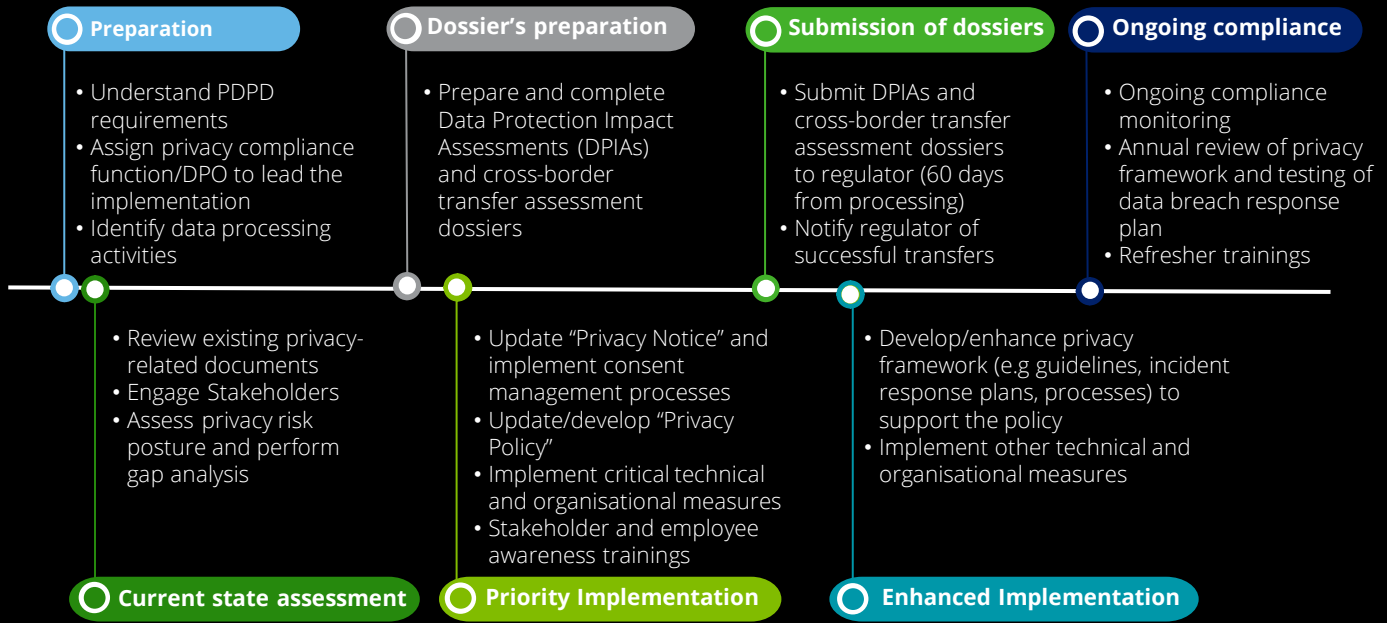
Data Breach Notification

Notify the regulatory authorities and affected individuals upon assessment of a data breach

Storage Limitation

Only keep personal data for an appropriate term in accordance with the purposes of processing

How compliance plan looks like?



How Deloitte can help?

The service offerings will be tailored for each business, depending on the its industry and other factors relating to organization size such as number of departments, amount of personal data processing activities and the complexity of the processes.



Overall PDPD Preparation and Advisory

- Review existing Corporate Privacy Framework, if exists, against PDPD
- Conduct document review of existing privacy policies and interviews with stakeholders to identify gaps against the PDPD requirements.
- Conduct current state assessment documenting observations and findings.
- Develop Privacy Framework with policies, documented procedures, and templates complying to both Corporate Privacy Framework and PDPD.
- Provide support in implementing recommendations.



Data Protection Impact Assessments (DPIAs)

- Conduct discussion sessions with key stakeholders to understand current processes and envisioned workflow for conducting of impact assessment.
- Develop impact assessment checklist and guidelines for stakeholders.
- Conduct training sessions on how to complete the impact assessment checklist.
- Provide support in completing the assessment.



Data Protection Officer as a Service (DPOaaS)

- Provide a data protection support hotline to provide advisory on PDPD related queries e.g structuring response to regulator's queries on potential complaint on PDPD breach etc.
- Conduct training and awareness outreach to raise awareness among relevant personnel on personal data processing and protection.
- Review and maintain data privacy and protection framework of the organisation.
- Report to Management on privacy risks.
- Support Global Data Privacy Office Operations (Large Enterprises Only).



Data Privacy Technology Implementation

- Conduct of requirements gathering interviews/workshops.
- Conduct market scanning for applicable solution capabilities.
- Implement solution and conduct user acceptance testing.
- Conduct handover training.

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