

PDP Panel Discussion

Vietnam PDPD No. 13/2023/ND-CP
Effective from 1st July 2023

GDPO Team
2024



Contents

**Fsoft Data
Protection
Journey**

01

**Challenges of
PDP in
Vietnam**

03

**Fsoft
compliance
to PDPD13**

02

Q&A

04



1. Fsoft PDP Journey

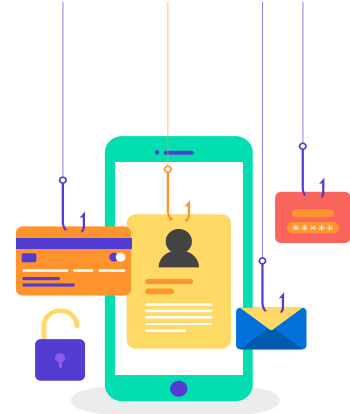
2018

Fsoft constituted the personal data protection function as an independent department, which enables function reporting to CFO/CO.

Our personal data protection function ensures compliance with the principles of national and international data protection laws in force all over the world.

2021

The first draft of PDPD13 => Fsoft incorporating the requirements in the draft PDPD13 to our PIMS & Personal Data Protection Handbook



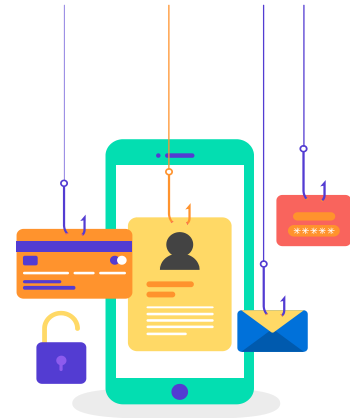
1. Fsoft PDP Journey

2023

PDPD13 came in force => FPT Corporation (of which Fsoft is a subsidiary) published DP policy as an umbrella for

2024

Fsoft collecting consent from all employees, conducting DPIA for data processing & data transfer and submit them to the Ministry



1. Fsoft PDP Journey

Fsoft ensures the adequate level of data protection prescribed by the GDPR, PDPD13, APPI, PDPA or other national Personal Data Protection Regulations

Fsoft processes:

- Employee data
- Customer data
- Send employee data to customer to create account in order to maintain their systems.



We have formulated the PDP handbook which includes policy, guideline, procedure and template. Those was published in our intranet, website, and be reviewed and updated twice a year

Data Privacy Office is responsible for overseeing data protection strategy and implementation to ensure compliance with national and international laws.

2. Fsoft compliance to PDPD13

Data Protection Policy and its compliance are supervised by GDPO

GDPO e-mail:
Michael.Hering@fpt.com

If requested, concerns and complaints will be handled confidentially

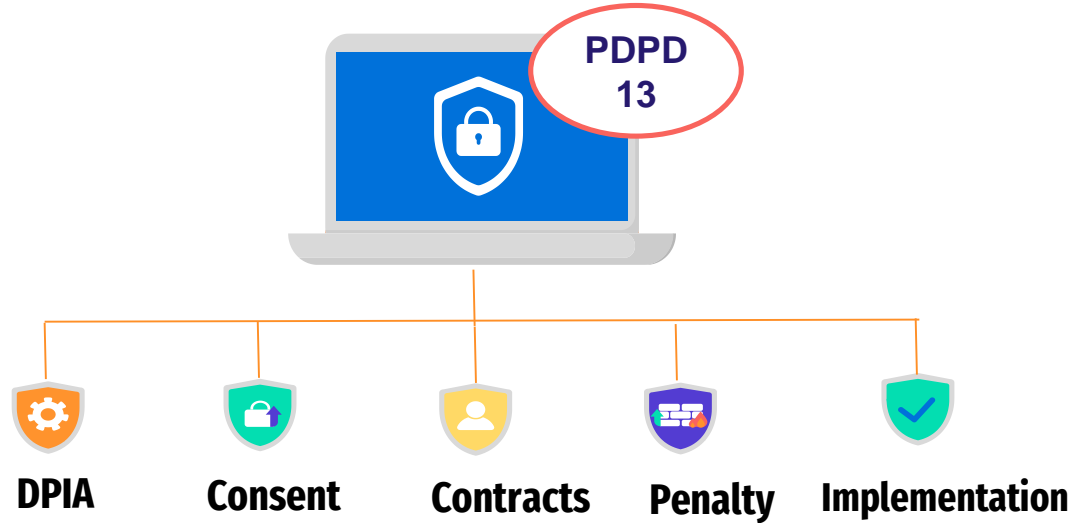
Collect consent from employees:

- Current employees: via email
- New employees: add data protection consent into labor contract



Conducting DPIA for data processing & data transfer and submit them to the Ministry

3. Challenges in PDP in Vietnam



3. Challenges in PDP in Vietnam



DPIA*

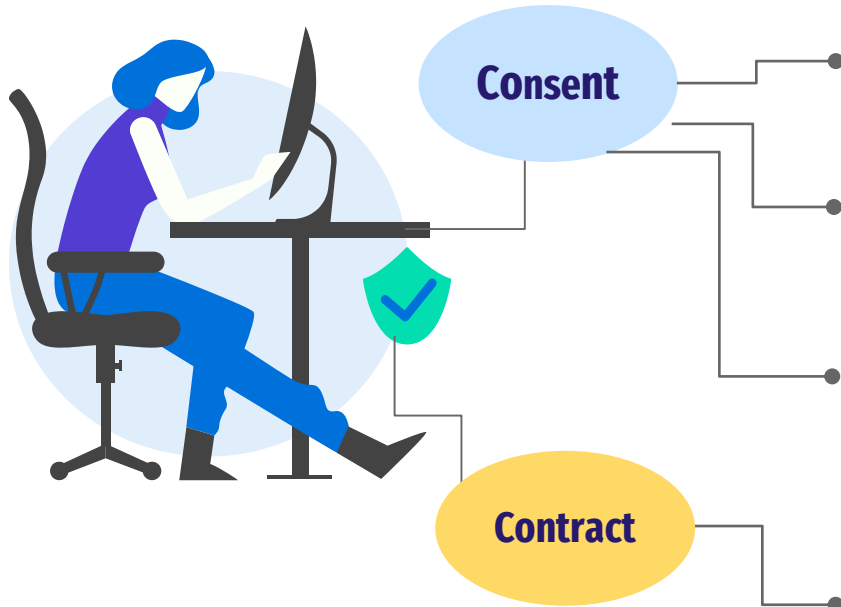
DPIA for employee data => should we send DPIA for every single process?

=> A company would have different activities from different departments that process employee data:

- HR admin/management tasks (social insurance, timesheets, salary, etc.)
- Recruiting (external and internal recruitment)
- Employee supporting (visa, travel, etc.)
- Union activities (gift on holidays, celebrate employees' children academic achievements, etc.)
- Company events, concerts, etc.
- Send employee data to customer to create account in order to maintain their systems.
- Projects with customers might involve processing their data

***DPIA: Dossier on Assessment of Impact/ Hồ sơ đánh giá tác động**

Rights of data subjects

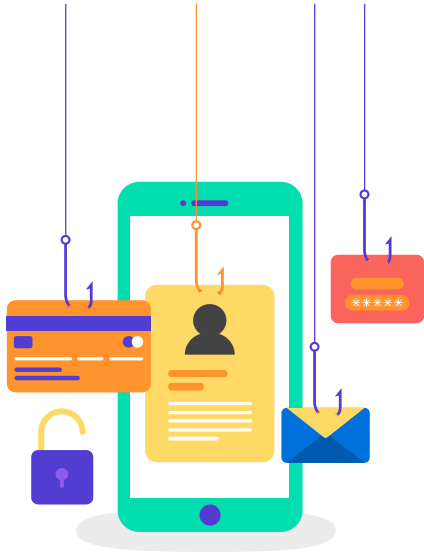


How we get consent from every employees => how about employee before the law came in force?

How to get mass consent from big amount of individuals?

How to deal with business card (does actively giving business card mean giving consent?) => do we need consent form every customer/contact person?

In which case does personal data shall be processed to fulfill obligations under contracts?



**Thank you
Q&A**

