





# Masterclass

## DATA & PRIVACY COMPLIANCE:


### A Strategic Implementation Approach for SaaS Platforms in Vietnam

*Exclusive Event by Data Protectify and AKA Digital*

 2:30pm - 4:30pm


 May 8, 2026

 Zoom Webinar in English

 Speaker: Mr. Hoàng Hà - DPO of Data Protectify. Certified by VN-DPO, GDPR-EU, CIPM, and CC-ISC2.



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EVENTS & UPDATES

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# AGENDA

- |           |  |                 |
|-----------|--|-----------------|
| <b>01</b> | An overview of key compliance requirements applicable to SaaS providers in Vietnam   | 🕒 14:30 - 15:00 |
| <b>02</b> | Impact assessment reporting requirements as mandated by the data protection authority (Ministry of Public Security)                        | 🕒 15:00 - 15:20 |
| <b>03</b> | Mechanisms for preparation, completion, and coordination with clients and regulatory authorities in accordance with applicable regulations | 🕒 15:20 - 15:40 |
| <b>04</b> | How technology platforms can prepare and support their clients in adapting to upcoming data protection requirements in Vietnam market      | 🕒 15:40 - 16:00 |
| <b>05</b> | Q&A  | 🕒 16:00 - 16:30 |



# 01

## AN OVERVIEW OF KEY COMPLIANCE REQUIREMENTS APPLICABLE TO SAAS PROVIDERS IN VIETNAM

- Internal -



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# VIET NAM REGULATORY LANDSCAPE ON DATA & TECHNOLOGIES

	<b>LAW ON DATA</b> <i>Decree No. 165/2025/ND-CP, Decree 169/2025/ND-CP, Decision 20/2025/QĐ-TTg</i>	 <b>Effective:</b> <b>01 Jul 2025</b>
	<b>LAW ON PERSONAL DATA PROTECTION</b> <i>Decree No. 356/2025/ND-CP</i>	 <b>Effective:</b> <b>01 Jan 2026</b>
	<b>LAW ON ARTIFICIAL INTELLIGENCE</b> <i>Note: Two (02) implementing Decrees and two (02) Decisions are currently under drafting process.</i>	 <b>Effective:</b> <b>01 Mar 2026</b>
	<b>LAW ON CYBERSECURITY</b> <i>Note: Six (06) implementing Decrees are currently under drafting process.</i>	 <b>Effective:</b> <b>01 Jul 2026</b>
	<b>SANCTION DECREE ON CYBERSECURITY AND PERSONAL DATA</b>	 <b>Tentative:</b> <b>01 Jul 2026</b>



# VIET NAM REGULATORY LANDSCAPE ON DATA & TECHNOLOGIES

## 01 TERRITORY SCOPE

- Vietnamese entities established or located in Vietnam
- Foreign entities located in Vietnam

## 02 EXTRA-TERRITORY SCOPE

- Directly involve or related to processing data of (i) Vietnamese citizens or (ii) Vietnam-origins (\*)
- Directly involve or related to cybersecurity assurance activities in Vietnam
- Provide cybersecurity products and services into Vietnam
- Relate to research, development, provision, deployment and use of AI systems



**"Solution-As-a-Service" provider shall be subject to compliance requirements in accordance with local data and technologies regulations.**



## KEY CONSIDERATION (For SaaS)



### REGULATORY SUBMISSIONS

Conduct Privacy Impact Assessments:

- **DPIA**
- **OTIA**

Provide **compliance evidence** to Data Controller



### DATA SUBJECT REQUESTS

Establish **handling mechanism**

**Take actions (i.e. stop processing, delete data)** as instructed



### DATA BREACH MANAGEMENT

Record, monitor potential breach for **timely actions**

**Report** to data protection authority

**Notify to data subject, effected parties, when required**



### DATA PROCESSING SERVICES

Meet the **conditions to provide services** on personal data processing

Complete regulatory procedure to **obtain licenses**



### DPO APPOINTMENT

Internal or outsourced **DPO services**

DPO appointment and **registration**



# KEY SANCTIONS FOR NON-COMPLIANCE

## MONETARY FINES

- Violations concerning the trading of personal data: **10 times the revenue gained from the violation**
- Violations concerning the cross-border transfer of personal data: **5% of its revenue in the previous fiscal year**
- Other violations concerning personal data protection: **VND 03 billions (~115K USD)**

## ADMINISTRATIVE & CORRECTIVE MEASURES

- **Deprivation** of the right to use **business licenses** for a definite time
- **Suspension of operation** for a definite time
- Other **corrective measures** required



# 02

## PRIVACY IMPACT ASSESSMENTS REPORTING REQUIREMENTS

AS MANDATED BY THE DATA  
PROTECTION AUTHORITY (MPS)



# PRIVACY IMPACT ASSESSMENTS

## Data Processing Impact Assessment

- Any activity that impacts personal data such as collecting, using, storage, transferring, deleting.

## Overseas Transfer Impact Assessment

- Hosting data server outside VN or hosting cloud of provider located overseas.
- Data recipients are org., individual located overseas.
- Data collection in Vietnam and transfer to platforms located outside VN to process.



## WHY?



**Data Protection Authority**  
inspection activities



**Sanctions Applied**

**100 Mil**  
VND

**03 months**  
suspension on  
business license


**03 months**  
suspension on  
processing activities



**Impact on Controller-Processor**  
**contractual arrangements**  
(Due Diligence)




# PRIVACY IMPACT ASSESSMENTS



## TIMELINE

<p><b>First Submission</b></p> <p><b>60 days</b> from processing date</p>	<p><b>MPS Results</b></p> <p><b>15 days</b> upon receipt</p>	<p><b>Corrective Actions</b></p> <p><b>30 days</b> upon regulator's request</p>
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## KEY NOTES

<ul style="list-style-type: none"> <li>• <b>One-off</b> baseline</li> <li>• On-going monitoring required             <ul style="list-style-type: none"> <li>◦ <b>Bi-annual</b> updates</li> <li>◦ <b>Immediate</b> notifications (within 10days)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Confirmation on Reports</li> <li>• <b>Request for Supplement</b></li> <li>• Refusal of Reports</li> <li>• <b>Timeline Extension Notice</b></li> <li>• Suspension Notice</li> <li>• Final Result Notification</li> </ul>	<ul style="list-style-type: none"> <li>• DPO contact point required</li> </ul>
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## CHANNELS

 <p><b>Online:</b> MPS Portal</p>	 <p><b>In-person:</b> A05 Office</p>	 <p><b>By post</b></p>
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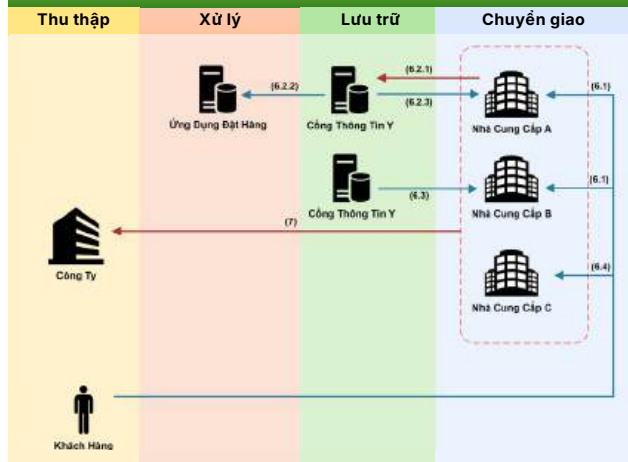
# PRACTICAL RECOMMENDATIONS

01



## COMPREHENSIVE DATAFLOW

Hoạt động xử lý dữ liệu cá nhân trong chương trình "XYZ" (Quy trình Giao hàng)



02



## ACCOUNTABILITY

- ✓ Sufficient information disclosed under reports
- ✓ Proof of evidence with clear directions
- ✓ Forward-looking approach to optimize updates

03



## DEDICATED EXPERTS

- ✓ Closely monitor post-submission
- ✓ Timely response to report-related inquiries
- ✓ Comply with required updates



# 03

## **MECHANISM FOR PREPARATION COMPLETION, AND COORDINATION WITH CLIENTS & REGULATORY AUTHORITIES IN ACCORDANCE WITH APPLICABLE DATA REGULATIONS**

- Internal -



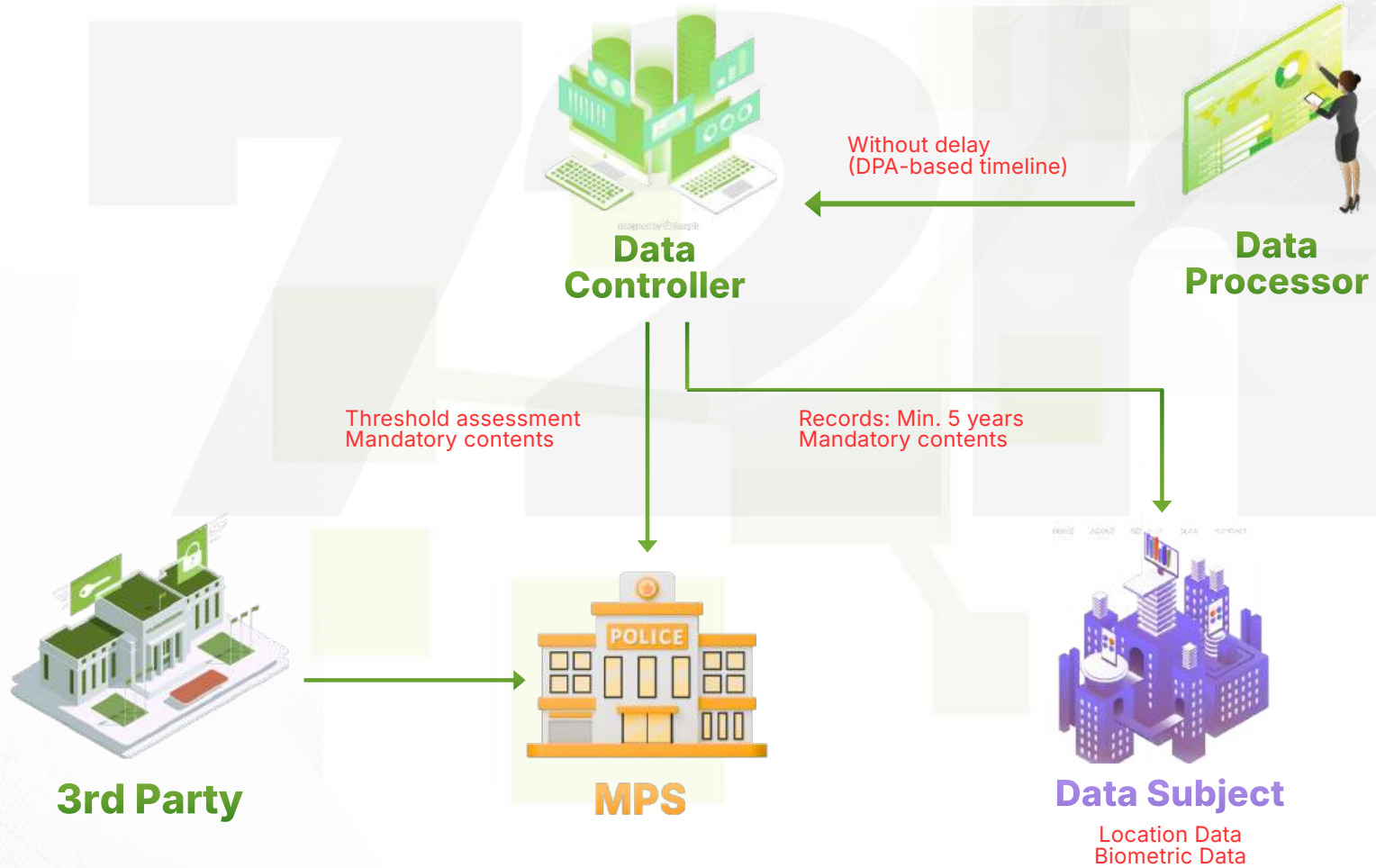
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# DATA PRIVACY BREACH



# DATA SUBJECT RIGHTS (DSR)

 <p><b>RESPONSE TIMELINE</b></p>	<p><b>02</b> WORKING DAYS</p>					 <p><b>RIGHT TO BE INFORMED</b></p>
 <p><b>FULLFILLMENT TIMELINE (*)</b></p>	 <p><b>RIGHT OF ACCESS, RECTIFICATION</b></p>	 <p><b>RIGHT OF PROVISION</b></p>	 <p><b>RIGHT TO WITHDRAW CONSENT, RESTRICT, OBJECT</b></p>	 <p><b>RIGHT TO IMPLEMENT PROTECTION MEASURES</b></p>	 <p><b>RIGHT FOR ERASURE</b></p>	 <p><b>RIGHT TO BE COMPLAINT, DENUNCIATIONS, LEGAL ACTIONS, DAMAGES CLAIMS</b></p>
	<p><b>10</b> days    <b>15</b> days</p>	<p><b>10</b> days    -</p>	<p><b>15</b> days    <b>20</b> days</p>	<p><b>15</b> days    -</p>	<p><b>20</b> days    <b>30</b> days</p>	<p>Depending on case conditions and applicable laws</p>
 <p><b>EXTENDED PROCESSING TIMELINE (**)</b></p>	<p><b>10</b> days</p>		<p><b>15</b> days</p>		<p><b>20</b> days</p>	
<p><b>SaaS Context</b></p>	<p>DSRs must be operationalized through product features and coordinated workflows.</p>	<p>Providers execute requests based on customer instructions and agreed SLAs.</p>	<p>System design should enable traceability, audit logs, and timely response to both data subject requests and security incidents.</p>			



# PERSONAL DATA PROCESSING SERVICE

## WHAT ARE DATA PROCESSING SERVICES?

"Personal data processing services refer to the **09 services** specified under Art. 21 of Decree 356/2025/ND-CP

1. Automated Processing Services

2. Credit Scoring & Rating Services

3. Online Data Collection Services

4. Health Data Processing Services

5. Ed-Tech Monitoring Services



PERSONAL DATA  
PROCESSING SERVICE

6. Data Analytics Services

7. Data Encryption Services

8. Advanced Technology Services

9. Location Data Platform Services



# PERSONAL DATA PROCESSING SERVICE

## CONDITIONS



### Establishment

Incorporated entity under Vietnamese law.



### Personnel

Criteria applicable to the responsible lead, management team, and number of qualified personnel.



### Infrastructure

Appropriate technical systems, facilities, and technology.



### DPIA/OTIA approvals

Completed and approved DPIA and OTIA (if applicable).

## PROCEDURE

### PREPARATION

- DPO information and service agreements template
- The proposal for the certificate issuance

### SUBMISSION

- Authority issues result within 10 days
- Requests supplementation within 15 days (if needed)

### CERTIFICATE ISSUANCE

- Within 30 days upon valid dossiers

### REVOCACTION

- Inactive business for 12 consecutive months
- Not remediate violations on personal data protection, when requested



# 04

## HOW TECHNOLOGY PLATFORMS CAN PREPARE AND SUPPORT THEIR CLIENTS IN ADAPTING TO UPCOMING DATA PROTECTION REQUIREMENTS IN VIETNAM MARKET

- Internal -



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# DATA PROTECTION OFFICER

## INTERNAL DPO, DATA PROTECTION DEPARTMENT

- Written **official appointment**
- Internal DPO qualifications: Bachelor, **02 years experience** of related expertise and sufficient privacy trainings
- NDA & **Disclaimer Agreement** (optional)

## OUTSOURCED DPO SERVICES

- Information and profile **published available**
- Outsourced DPO qualifications: Bachelor, **03 years** experience of related expertise and sufficient privacy trainings
- **Service agreement**, Data processing agreement



## ROLES & RESPONSIBILITIES

- Policies, procedures, templates development
- Data subject rights implementation
- Data privacy self-assessment (periodic-basis)
- DPIA/OTIA submissions
- Incident response, data privacy breach report
- Data protection training.
- Other oversight on personal data protection



# DATA PROTECTION OFFICER & GRC TOOL

BUILT FOR VISIBILITY

One platform. Every obligation. Always audit-ready.

## RECORD OF PROCESSING

PDPL FOUNDATION

### Data Inventory and Mapping

Every data processing activity, centralized, maintained, always audit-ready.

## RISK & IMPACT

### AI-assisted impact assessments

AI-assisted assessment workflows for OTIA/DPIA faster completion, consistent outputs, fully traceable.

## DSR & BREACH MANAGEMENT

PDPL PRIORITY

### Request, breach handling

Every request and breach captured, assigned, tracked and closed, with a full audit trail.

## POLICY LIFECYCLE

### Policy management

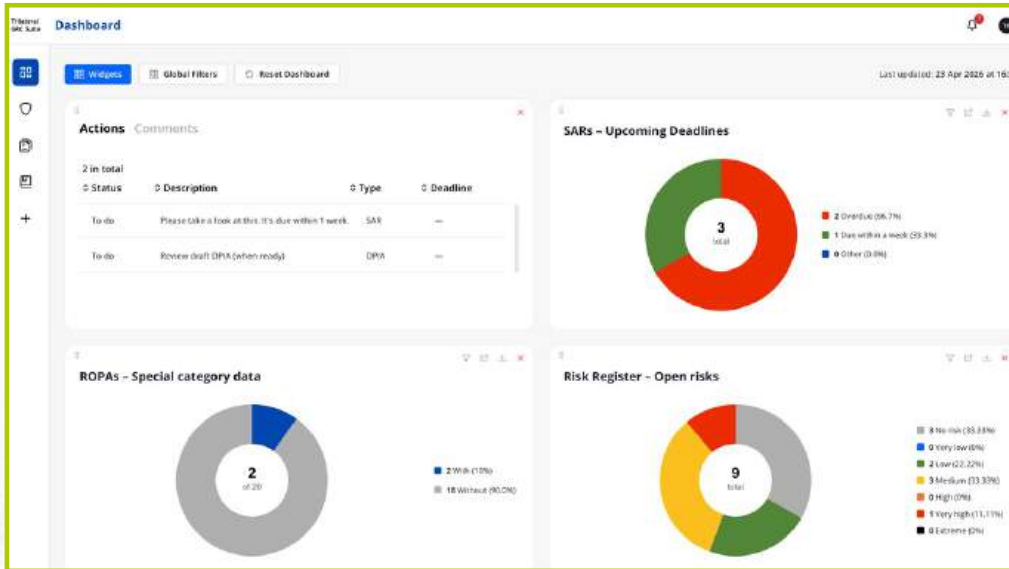
Centralized policy lifecycle with assignment, acknowledgement and review cycles.



# VIETNAM-READY SOLUTION

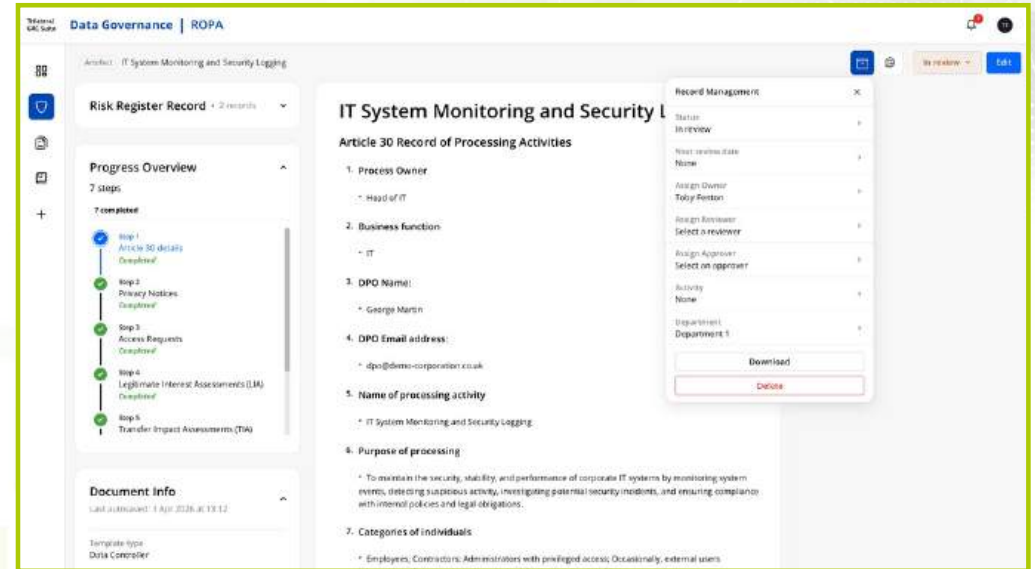
BUILT FOR VISIBILITY

One platform. Every obligation. Always audit-ready.



## Dashboard Overview

Everything linked, integrated and searchable in one place.



## Compliance Workflow


Standardized workflows and smart suggestions to ensure alignment.



# DATA PROTECTIFY "ALL-IN-ONE"

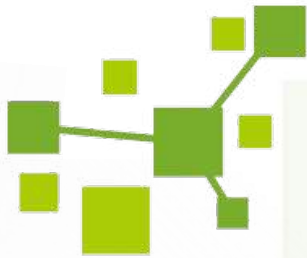
Our DPO Packages offer tailored service options to support proactive compliance and ongoing support as follows:

<p><b>DPO FLEX</b></p>  <p><b>Hourly</b></p> <hr/> <p><i>*Pay-as-you-go for ad hoc needs, applicable to DPO support services only.</i></p>	<p><b>DPO CARE</b></p>  <p><b>Monthly</b></p> <hr/> <p><i>*Fixed-term (e.g. 12 months) support with monthly allocated hours. Billed on a monthly basis.</i></p>	<p><b>DPO CORE</b></p> <table border="1"> <tr> <td data-bbox="1128 584 1379 786"> <p><b>40H</b></p> <p><i>Duration 6 months</i></p> </td> <td data-bbox="1379 584 1682 786"> <p><b>[...]</b></p> <p><i>Duration X months</i></p> </td> </tr> </table> <hr/> <p><i>*Pre-purchased hours under a contracted term. Flexible usage within the agreed duration.</i></p>	<p><b>40H</b></p> <p><i>Duration 6 months</i></p>	<p><b>[...]</b></p> <p><i>Duration X months</i></p>	<p><b>OUR DEMO</b></p> 
<p><b>40H</b></p> <p><i>Duration 6 months</i></p>	<p><b>[...]</b></p> <p><i>Duration X months</i></p>				

<p> <b>SCOPE OF SERVICE FOR ALL PACKAGES</b></p>	<ul style="list-style-type: none"> <li>✓ DPO Advisory and Operational Support</li> <li>✓ High-Risk and Strategic Advisory</li> </ul>	<ul style="list-style-type: none"> <li>✓ Data Protection Authorities' Engagement</li> <li>✓ Privacy Solutions: <b>GRC SUITE TRILATERAL</b></li> </ul>
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# Q&A





# DATA PROTECTIFY

COMPLIANCE



# THANK YOU



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- Internal -