



PERSONAL DATA PROTECTION POLICIES

Introduction

This document outlines the personal data protection policies of Global Vietnam Lawyers ("the Firm"). These policies are designed to ensure compliance with Decree 13/2023/ND-CP dated 17 April 2023 on personal data protection ("Decree 13/2023") and other applicable data protection regulations, maintain the confidentiality and security of personal data, and uphold the privacy rights of individuals whose data the Firm processes.

Scope

These policies apply to all employees, contractors, and partners of the Firm who handle personal data in any capacity. Compliance with these policies is mandatory, and any violation may result in disciplinary action, legal consequences, or both.

Principles

The Firm is committed to adhering to the following principles when handling personal data:

Lawfulness, Fairness, and Transparency:

Personal data will be processed lawfully, fairly, and transparently, in accordance with Decree 13/2023 and other applicable laws and regulations.

Purpose Limitation:

Personal data will be collected for specified, explicit, and legitimate purposes, and will not be further processed in a manner that is incompatible with those purposes.

Data Minimization:

The Firm will only collect and process personal data that is necessary for the intended purposes.

Accuracy:

Reasonable steps will be taken to ensure that personal data is accurate, complete, and kept up-to-date.

Storage Limitation:

Personal data will be retained for no longer than necessary for the purposes for which it was collected or as required by Decree 13/2023 and other applicable and regulations.

Integrity and Confidentiality:

Appropriate technical and organizational measures will be taken to ensure the security, confidentiality, and integrity of personal data.

Data Collection and Processing

Consent:

Obtain clear and unambiguous consent from individuals before collecting or processing their personal data, where applicable.

Data Collection:

Clearly define the purpose of data collection and collect only the necessary data for that purpose.

Sensitive Data:

Exercise special caution when processing sensitive personal data, ensuring that additional security measures are in place.

Data Security

Access Control:

Limit access to personal data to authorized individuals based on their roles and responsibilities.

Encryption and Anonymization:

Use encryption and anonymization techniques to secure personal data during storage and transmission.

Incident Reporting:

Establish procedures for reporting and addressing data breaches or security incidents promptly and in compliance with legal requirements.

Data Subject Rights

Access and Rectification:

Provide individuals with the right to access and correct their personal data.

Data Portability:

Allow individuals to request the transfer of their personal data to another controller in a structured, commonly used, and machine-readable format.

Right to Erasure ('Right to be Forgotten'):

Implement mechanisms to erase personal data upon request, where appropriate and in compliance with legal obligations.

Training and Awareness

Education:

Provide regular training to employees and stakeholders on data protection principles, policies, and procedures.

Awareness:

Foster a culture of data privacy awareness and accountability within the organization.

Compliance and Monitoring

Compliance with Laws:

Ensure compliance with applicable data protection laws and regulations.

Regular Audits:

Conduct regular audits to assess compliance with these policies and applicable laws.

Reporting and Enforcement

Reporting Violations:

Encourage reporting of any suspected violations of these policies through appropriate channels.

Enforcement:

Enforce these policies through disciplinary actions, as necessary, to ensure compliance and accountability.

Contact Information

For inquiries or concerns regarding personal data protection, contact Ms. Thu Trang at thutrang.nguyen@gvlawyers.com.vn.