

Draft Law on Data (fifth version):¹ A new chapter for Vietnam’s legal landscape on data

– What should businesses do to prepare for its implementation? –

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Introduction

Data plays a critical role in today’s businesses and is often viewed as “the new oil”, or as a commodity even more valuable than that. However, Vietnam’s data protection landscape is a patchwork of regulations. While the country has a decree for personal data protection and is currently developing laws on the same,² non-personal data has been governed by a variety of fragmented legislation. As Vietnam continues its rapid digital transformation, the necessity of a comprehensive legal framework to regulate not only personal data but other types of data has become increasingly urgent. Recently, the Vietnamese government has been actively working on a draft Law on Data (“**Draft Data Law**”), the promulgation of which will mark a major change in the country’s legal framework on data. This new law on data, if adopted, aims to strengthen data protection and privacy standards while encouraging the growth of data-related products and services in Vietnam, and will become the primary legal instrument governing data within Vietnam as it will supersede other laws in effect in Vietnam that govern the same topics.³

In this newsletter, we provide an overview of the Draft Data Law, unraveling its key provisions and exploring the potential impact it may have on businesses operating in Vietnam, and answer the question of what businesses in Vietnam should do to prepare for its implementation.

1. What is the scope of governance of the Draft Data Law?

The Draft Data Law governs a broad spectrum of matters related to data, including the development, processing, administration, and management of data; application of science and technology in data processing; the National General Database (“**NGD**”) and National Data Center (“**NDC**”); data products and services; state management of data; and responsibilities of agencies, organizations, and individuals related to data activities.⁴

¹ This newsletter unveils the regulations under the fifth version of the draft Law on Data dated October 14, 2024.

² Please see details in our newsletter on the draft Law on Personal Data Protection (“**Draft PDPL**”) (accessed at https://www.nishimura.com/en/knowledge/newsletters/asia_data_protection_240927_2).

³ Draft Data Law, Article 4

⁴ Draft Data Law, Article 1

2. Who is subject to the Draft Data Law?

The Draft Data Law applies to the following entities: (i) Vietnamese agencies, organizations, and individuals; (ii) offshore agencies, organizations, and individuals based in Vietnam; and (iii) offshore agencies, organizations, and individuals that directly engage in or are related to the development, processing, and administration of data in Vietnam.⁵

The scope of the entities subject to the Draft Data Law is extensive, capturing offshore agencies, organizations, and individuals providing online services across borders in Vietnam (without having any commercial presence in Vietnam) if they directly engage in or are related to data processing activities in Vietnam. While the law oversees offshore agencies, organizations, and individuals related to data processing activities in Vietnam, it does not provide any criteria to determine whether and how a concerned offshore agency, organization, or individual is deemed “related to” data processing activities in Vietnam. As a result, any minor relation between an offshore entity and a data processing activity in Vietnam may well subject such entity to the Draft Data Law.

This is not the first time Vietnamese lawmakers have chosen to adopt a broad approach, as the Draft PDPL as well as Decree No. 13/2023/ND-CP of the Government dated 17 April 2023 on personal data protection (“**Decree 13**”) demonstrated a similar trend.⁶ It appears that, from a legislative drafting standpoint, it might be challenging for the lawmakers to precisely predict the specific activities that are “related to” data processing activities in Vietnam, and therefore, a broad yet ambiguous regulation should be used to accommodate future possibilities. Since the law is vague, the authorities might also have the right to interpret the terminology on a case-by-case basis.

3. When will the official law on data be promulgated and take effect?

The official law on data was set to be promulgated by the National Assembly of Vietnam in the second quarter of 2025 and will take effect on 1 January 2026 with no grace period.⁷ An unofficial source has informed us that the process of drafting this law is about to be accelerated, as the National Assembly of Vietnam is likely to discuss and vote to promulgate the law within this month (November 2024), if there are no pending critical matters. However, we do not think it is feasible due to the vagueness and ambiguity of the Draft Data Law, as discussed below.

4. Which key data-related entities are recognized and regulated by the Draft Data Law?

The Draft Data Law recognizes and regulates the following key data-related entities:

- (i) Data subject: an individual or organization to whom/which the data pertains.⁸

⁵ Draft Data Law, Article 2

⁶ Draft PDPL, Article 1; Decree 13, Article 1

⁷ Draft Data Law, Article 67; Resolution No. 48/2024/UBTVQH15 dated 23 July 2024, Article 1.2

⁸ Draft Data Law, Article 3.17

- (ii) Data owner: an agency, organization, or individual having the right to process and decide on policies for processing data collected and created by them.⁹
- (iii) Data administrator: an agency, organization, or individual developing, managing, operating, and utilizing data at the request of a data owner.¹⁰
- (iv) Data user: a natural person or legal entity having the right to lawfully access the data and the right to exploit and use such data for purposes and conditions agreed upon by the data administrator or data subject.¹¹

Notably, since the Draft Data Law covers both personal data and non-personal data, **data subject** refers to not only an individual but also an organization. This might cause confusion among businesses as well as legal practitioners if they are new to data privacy area as the term can have different meanings depending on the context. As such, we recommend paying close attention to the context in which the data subject is mentioned. *See more on potential conflicts between the Draft Data Law and the Draft PDPL in Item 12 below.*

5. What types of data are governed by the Draft Data Law?

Under the Draft Data Law, “data” is defined as a digital representation of a thing or event, including audio, image, numerals, writing, symbols, or other similar forms.¹² This definition seems to broadly capture all contemporary types of data. The Draft Data Law further classifies data into the following categories.¹³ Of note, the data classifications below are only mandatory for agencies of the Communist Party, the State, and socio-political organizations, while it is optional for other entities, including enterprises.

- (i) Classification by the type of data being transmitted, including: (a) shared data, (b) private data, and (c) open data.
- (ii) Classification by the subject of the data, including: (a) personal data, and (b) non-personal data.
- (iii) Classification by the method of data generation, including: (a) original data, and (b) synthetic data.
- (iv) Classification by the materiality of the data content, the degree of harm if it is illegally altered, destroyed, leaked, forged, used or shared, including: (a) core data, (b) important data, and (c) other data.
- (v) Classification by the sector: Although the Draft Data Law does not further prescribe the specific categories of data following this classification, some examples of such categories may include data in the medicine sector, investment sector, banking sector, etc.

In addition to the data categories above, the Draft Data Law further provides the concept of “metadata”, which is defined as data describing data in a detailed manner.¹⁴ However, other than the foregoing definition and a general requirement for data administration, including metadata administration, the Draft Data Law does not set forth any additional rules regarding about metadata. It is possible that metadata will be further regulated

⁹ Draft Data Law, Article 3.22

¹⁰ Draft Data Law, Article 3.21

¹¹ Draft Data Law, Article 3.24

¹² Draft Data Law, Article 3.1

¹³ Draft Data Law, Article 12

¹⁴ Draft Data Law, Article 3.27

under the guiding documents of the Draft Data Law.

Among those types of data, special attention to “*core data*” and “*important data*” is required, as such data types are subject to strict procedures for overseas transfer (as discussed in **Item 11** below). As such, the broader the scope of core data and important data, the greater the number of businesses and entities that will be subject to such strict transfer procedures. *See further details in Item 11 below.*

6. What types of data processing activities are governed by the Draft Data Law?

Data processing activities under the Draft Data Law are broadly defined as covering any activities affecting data, including but not limited to collecting, recording, analyzing, synthesizing, confirming, authenticating, storing, editing, updating, modifying, publishing, combining, accessing, retrieving, revoking, encrypting, decrypting, copying, sharing, coordinating, transmitting, providing, transferring, deleting, destroying, backing up, and restoring data.¹⁵

In addition, the Draft Data Law provides specific definitions of a number of data processing activities, e.g., analyzing and synthesizing,¹⁶ confirming;¹⁷ authenticating;¹⁸ publishing;¹⁹ accessing;²⁰ transmitting;²¹ combining;²² modifying and updating;²³ sharing;²⁴ and coordinating data.²⁵ Such definitions can be used to interpret vague and general concepts of data processing activities under other laws (e.g., Decree 13).

7. Are there any conditions and/or licensing procedures for the provision of data intermediary products and services, data analysis and synthesis products and services, and data trading floor services?

Yes, there are conditions and licensing procedures for the provision of data intermediary products and services, data analysis and synthesis products and services, and data trading floor services, with the following details.

¹⁵ Draft Data Law, Article 3.2

¹⁶ Draft Data Law, Article 3.29

¹⁷ Draft Data Law, Article 3.30

¹⁸ Draft Data Law, Article 3.31

¹⁹ Draft Data Law, Article 3.32

²⁰ Draft Data Law, Article 3.33

²¹ Draft Data Law, Article 3.38

²² Draft Data Law, Article 3.43

²³ Draft Data Law, Article 3.44

²⁴ Draft Data Law, Article 17.1

²⁵ Draft Data Law, Article 17.2

Definitions

Under the Draft Data Law:

- (i) **Data intermediary products and services** are broadly defined as products and services aimed at establishing a commercial relationship between one party (data subjects and data owners) and the other party (data users), through technical, legal, or other means for the purpose of sharing data and exercising the rights of data subjects related to personal data, excluding certain types of services.²⁶
- (ii) **Data analysis and synthesis products and services** means the results of technology application processes to analyze and synthesize data from the original data to generate useful information with various degrees of comprehensiveness and usefulness that meet data users' demands.²⁷
- (iii) **Data trading floor** means an online trading platform on the Internet which provides a controlled environment for data trading, thereby ensuring safety and compliance with the law.²⁸

The definition of data intermediary products and services under the Draft Data Law might be excessively broad and may even encompass common products and services of ordinary businesses, even though they might not necessarily qualify as data intermediary products and services, given that they may (a) incorporate multiple functions and services, and the data sharing might only be an auxiliary purpose to facilitate the ultimate purpose (i.e., commercial purposes), or (b) serve solely as tools for data sharing between data owners or data subjects and data users, without the purpose of establishing a commercial relationship between them for the purpose of sharing data (e.g., cloud storage service, web browsers, and email services). Thus, this should be revisited by the drafting agency in future rounds of deliberations.

Conditions for the provision of data intermediary, analysis, and synthesis products and services and data trading floor services

The Draft Data Law prescribes a number of conditions for the provision of data intermediary products and services, data analysis and synthesis products and services, and data trading floors, and further sets forth a licensing procedure to obtain the confirmation of the competent authority regarding eligibility to provide the data products and services above.

In particular, the abovementioned conditions include (i) conditions on the organization providing the products and/or services, (ii) conditions on the personnel, and (iii) conditions on the facilities, technical equipment, service provision management processes, and plans to ensure security and order.²⁹ Notably, following the conditions in item (i) above, organizations providing data intermediary products and services, and data analysis and synthesis products and services may be public non-business establishments or enterprises established or registered to operate in Vietnam in accordance with the law; while the organizations providing data trading floor services may only be state-owned enterprises or non-business public establishments. Foreign entities are not allowed to provide cross-border data intermediary products and services or data analysis and synthesis

²⁶ Draft Data Law, Article 3.4

²⁷ Draft Data Law, Article 52.1

²⁸ Draft Data Law, Article 3.10

²⁹ Draft Data Law, Article 49

products and services, and must instead establish an enterprise or be registered in Vietnam to provide such products and services. On the other hand, non-state entities, like private companies (including foreign-invested companies) or offshore companies are not allowed to provide data trading floor services in Vietnam. If the conditions above are officially adopted, it seems that cross-border provision of the abovementioned products and services by offshore entities to Vietnam-based users is legally infeasible.

Licensing procedures for the provision of data intermediary, analysis, and synthesis products and services and data trading floor services

Under the Draft Data Law, providers of data intermediary products and services, data analysis and synthesis products and services, and data trading floor services must obtain a license from the Ministry of Public Security.³⁰

The Draft Data Law further subjects the following types of data intermediary products and services to registration: (i) data intermediary products and services providing infrastructure to accommodate the needs of data exchange, exploitation, and sharing; and (ii) data intermediary products and services supporting the management and processing of data (including entrusting data management, providing tools and utilities to provide, share, combine, protect data, and exercise the rights of data subjects).³¹ As the Draft Data Law does not prescribe further details of any of the licensing procedures above, it remains unclear whether the registration procedure is essentially the process of obtaining the abovementioned license or a licensing procedure in addition to obtaining such license.

8. What types of data are allowed to be traded on data trading floors?

Various types of data can be traded on a data trading floor if such data satisfies certain requirements. The concept of a data trading floor is newly introduced by the Draft Data Law and is defined as an online trading floor to create a supervised data trading environment to ensure safety and compliance with the law.³² A data trading floor has the functions of trading, exchanging, buying and selling, and providing products and services related to data in a suitable, accurate, and legal manner to the subjects requesting such products/service.³³ To be traded on a data trading floor, a data product must satisfy the following requirements:³⁴

- (i) it is a product created from non-personal data or personal data (which has been consented to by the relevant data subject);
- (ii) it does not affect security or national defense, or materially infringe upon state secrets, public interests, legitimate rights, and interests of agencies, organizations, and individuals;
- (iii) it must satisfy the conditions on both participating in transactions of data products and the legality thereof (including the source of products; objects, contents, methods, and processes for creating

³⁰ Draft Data Law, Articles 49.1, 50.3, and 52.2

³¹ Draft Data Law, Article 50.1

³² Draft Data Law, Article 3.10

³³ Draft Data Law, Article 53.1

³⁴ Draft Data Law, Article 53.4

products; identification of requirements related to restrictions or non-restrictions on use and trading of products).

Furthermore, the following data is not allowed to be traded on a data trading floor: (i) data that is harmful to military, national defense, national security, or social order and safety; (ii) data (including personal data) whose acquisition has not been consented to by the data subject; and (iii) other data that is strictly prohibited by law.³⁵ As such, it appears that any type of data and data products that satisfy the aforementioned conditions can be traded on a data trading floor.

9. Does data constitute property under the Draft Data Law?

The Draft Data Law has recognized data as a type of property, which is indicated via the definition of a data owner (i.e., an agency, organization, or individual who has the right to process and decide on data processing policies that it, he, or she collects and creates)³⁶ and of the data rights of a data owner (i.e., property comprising the right to manage, use, and dispose of the data).³⁷

With data owners' data rights recognized as property under the law, it seems feasible for data owners to exercise his or her ownership rights over such property rights pursuant to general civil laws (e.g., selling or transferring the rights to other entities, or mortgaging the rights to secure the data owner's obligations to a third party). However, as data is not a normal asset that can be freely transferred, and is unique and governed by stringent legal regulations, exercising such rights may be subject to limitations imposed by other applicable laws (e.g., a data owner might not be able to transfer its data rights to another entity if the data subject has not consented thereto). Consequently, the potential scope and limitations of these rights should be examined carefully.

10. In what cases are companies compelled to provide data to state agencies under the Draft Data Law?

Under the Draft Data Law, companies are compelled to provide data to the competent agencies in the following cases upon receipt of a written request from the competent agencies or the NDC:³⁸

- (i) when the requested data is necessary to respond to an emergency; serve national defense and security, and ensure national interests; or
- (ii) when the lack of available data prevents a Party agency, State agency, or socio-political organization from fulfilling a specific task in the public interest that has been stipulated by law, and the Party agency, State agency, or socio-political organization cannot obtain that data by other alternative measures.

The data collected by the competent agencies or the NDC in the abovementioned cases will be uploaded to

³⁵ Draft Data Law, Article 53.7

³⁶ Draft Data Law, Article 3.22

³⁷ Draft Data Law, Article 3.23

³⁸ Draft Data Law, Articles 18.1, 18.2, and 37.2

and stored in the NGD, which may be accessed and utilized by any individuals and organizations.³⁹

The above grounds for mandating companies to provide data to the state agencies are quite vague (particularly item (ii)), which gives the competent agencies significant discretion as to whether to compel companies to provide data to such agencies, unless there is further detailed guidance or clarification to narrow such grounds. Furthermore, although the data uploaded to the NGD (which might be or include data vital for a company's business) can be utilized by other individuals and organizations without such company's consent (i.e., only the consent of the NDC, and/or personal data subject in case of personal data, is required), the Draft Data Law is silent on any compensation mechanism in case of a data breach caused by the competent agency or the NDC, which might be commercially unfair to businesses, as the owners of such trade secrets.⁴⁰

11. What procedures under the Draft Data Law are applicable to overseas data transfers?

Under the Draft Data Law, overseas transfers of data to foreign organizations and individuals is defined as using cyberspace, equipment, electronic means, or other forms to transfer data to a location outside the territory of Vietnam or using a location outside the territory of Vietnam to process data or transfer data to foreign organizations and individuals.⁴¹

Based on the wording of the Draft Data Law, (i) overseas transfers of personal data are governed by personal data protection regulations, not the Draft Data Law, and (ii) it appears that only overseas transfers to foreign organizations and individuals of data classified as either important data⁴² or core data⁴³ are subject to certain transfer procedures under the Draft Data Law, while the overseas transfer of other types of data (i.e., data that is not important data, core data, and personal data) is not subject to any procedures under the Draft Data Law. For clarity, depending on the type of data to be transferred overseas, certain approvals under other laws might be required, for instance, transfers of technology might be subject to approval from the competent authority pursuant to the laws on technology transfers. As a result, the scope of "important data" and "core data" should be clearly explained and identified to determine the scope of the entities subject to the data transfer procedures and requirements.

However, in our opinion, the definitions of that data are vague. Particularly, we find it difficult to interpret the concepts of "*direct danger to national defense and security, economic activities, social stability, public health and safety*" or "*data related to the lifeblood of the national economy, important livelihoods of people, major public interests*" as factors to determine the subject data. Furthermore, as noted in item 5 above, the determination and classification of that data shall be conducted by each of the Communist Party agencies,


³⁹ Draft Data Law, Articles 34.1, 35, and 37.2(a)

⁴⁰ Draft Data Law, Article 35.3(c)

⁴¹ Draft Data Law, Article 3.28

⁴² Under Article 3.25 of the Draft Data Law, important data is defined as data in a field, group, or region that directly endangers national defense and security, economic activity, social stability, public health, and safety when leaked, forged, or destroyed.

⁴³ Under Article 3.26 of the Draft Data Law, core data is defined as important data with a high coverage (*phạm vi bao phủ cao*, in Vietnamese) in fields, groups, and regions that directly affect national defense and security when used and shared illegally. Core data includes data related to important national defense and security sectors, data related to the lifeblood of the national economy, important livelihood of people, significant public interests, and other data as decided by the Prime Minister.



the State agencies and socio-political organizations (subject to their management competence), and even any other organizations than the aforementioned ones if they opt to apply the same classification approach as encouraged by the Draft Data Law above. This results in a broad and vague scope of “important data” and “core data”, and accordingly, expansion of the entities that are subject to these data transfer procedures.

Summarized below are the major procedures applicable to the overseas transfer of important data and core data under the Draft Data Law:

- (i) **Impact assessment:** Before an overseas transfer of data classified as either important data or core data is performed, the transfer shall be subject to an impact assessment and the approval of the competent authority (which may be the Prime Minister, Ministry of Defense, or Ministry of Public Security, depending on the type of data).⁴⁴ In addition, after the overseas data transfer is performed, the transfer shall continue to be supervised and subject to periodic impact assessment.⁴⁵

The impact assessment above focuses mainly on the risks that data provision and transfer activities may cause to national defense, security, public interest, and legitimate rights and interests of individuals and organizations. The contents of the assessment cover a large number of issues as prescribed by the law (e.g., the lawfulness, purpose, and necessity of the data transfer, the scope and method of data transfer, and the data processing activities conducted by the data importer).⁴⁶

Based on the wording of the relevant regulations, it appears that the competent authority must carry out the impact assessment, although the obligations of companies transferring data overseas in such procedures are unclear.⁴⁷ If this is the case, the impact assessment procedure under the Draft Data Law is substantially different from that under Decree 13, under which the impact assessment applicable to the overseas transfer of personal data shall be conducted by the data exporter, rather than the authority. Notwithstanding the above, it is anticipated that data exporters will bear the responsibility to, among other things, submit relevant documents and provide relevant information about an overseas data transfer.

- (ii) **Execution of data transfer agreement:** The Draft Data Law mandates that data exporters enter into data transfer agreements with data importers which contain provisions on data protection responsibilities.⁴⁸

On a related note, under the Draft Data Law, domestic organizations and individuals shall not provide data stored in the territory of Vietnam to foreign judicial or law enforcement agencies without the approval of the competent Vietnamese authorities.⁴⁹ This regulation is quite ambiguous and may be problematic in regard to its implementation, particularly for Vietnamese subsidiaries of foreign corporations who are more likely to deal

⁴⁴ Draft Data Law, Articles 25.2 and 25.3

⁴⁵ Draft Data Law, Article 25.7

⁴⁶ Draft Data Law, Article 25.6

⁴⁷ Draft Data Law, Articles 25.2 and 25.3

⁴⁸ Draft Data Law, Articles 25.4(b) and 25.6(dd)

⁴⁹ Draft Data Law, Article 25.8

with data provision requests from foreign law enforcement and/or judicial authorities, due to the following reasons.

- (i) Decisions of foreign judicial or law enforcement agencies (each, a “**Foreign Authority**”) may constitute legally binding decisions to which domestic organizations and individuals must adhere. Therefore, if the competent Vietnamese authorities do not approve or excessively prolong the approval process, causing the domestic organizations and individuals to fail to comply with the Foreign Authority’s decisions, the domestic organizations and individuals might be subject to sanctions by the Foreign Authority. If the domestic organization is a subsidiary of a multinational corporation, such corporation may be at risk of being sanctioned by the Foreign Authority for a violation committed by its subsidiary. In such a case, it is unclear whether the Vietnamese authorities will compensate for the loss incurred by the domestic organization or multinational corporation.
- (ii) The term “*data stored in the territory of Vietnam*” is broad and may include data that is owned by foreign organizations or individuals, but not domestic organizations and individuals. Furthermore, since this article only refers to “data” (rather than any specific data), it could include all types of data that are not necessarily subject to this strict procedure which significantly interferes with the free flow of data.
- (iii) It is unclear whether it is permissible for domestic organizations and individuals to make copies of the concerned data, store those copies outside the territory of Vietnam, and provide such copies to the Foreign Authority. In this case, the data in question is still kept in the territory in Vietnam and only copies thereof are provided to the Foreign Authority.

12. Are there any conflicts between the Draft Data Law and the Draft PDPL?

Yes, there are some major conflicts between these laws. Even though the Draft Data Law is a general legal framework governing data in Vietnam, and may prevail over other laws in Vietnam on the same matters, since both the Draft Data Law and the Draft PDPL are currently being drafted, they should be aligned, particularly on some key matters concerning personal data. Nevertheless, as per our review of the latest version of the Draft PDPL, there are certain key discrepancies between the two draft laws that may result in impairing their implementation. Some such discrepancies are as follows.

- (i) **Data publicity:** Under the Draft Data Law, personal data must not be publicly disclosed without the data subject’s consent.⁵⁰ In contrast, under the Draft PDPL, personal data that is disclosed publicly in accordance with law is not subject to data subject consent.⁵¹ It is an obvious conflict between the two draft laws which is likely to cause legal complexities in their interpretation and implementation, should they be officially promulgated.
- (ii) **Data trading:** Under the Draft Data Law, personal data is allowed to be traded via a data trading floor if consented to by the data subject.⁵² On the other hand, under the Draft PDPL, trading of personal data in any manner and form is strictly prohibited, regardless of data subject consent.⁵³ Again, this highlights the significant conflict between the two draft laws.

⁵⁰ Draft Data Law, Article 21.3(a)

⁵¹ Draft PDPL, Article 17.2

⁵² Draft Data Law, Articles 53 and 3.1

⁵³ Draft Data Law, Articles 3.1 and 8.6

Given the importance of these matters and the ongoing drafting process, these inconsistencies may be addressed in future revisions of the draft laws.

Conclusion and recommendations for businesses

The promulgation of a law governing all data marks a significant step forward in Vietnam's efforts to strengthen data protection and privacy regulations, while fostering the growth of its digital economy. However, the current regulations under the Draft Data Law might be revised, as lawmakers have been and might possibly continue to actively and frequently refine and amend the Draft Data Law before proposing the final version to the National Assembly. Also, although the Draft Data Law provides a general framework for data governance, certain matters explained above remain unclear, as they will be further clarified by the Government later (e.g., classification of data; data provision form and requesting competence; data publicity; cross-border transfer of data; the broad definition of and stringent conditions for the provision of data intermediary products and services, data analysis and synthesis products and services, and data trading floors), which could lead to compliance challenges for businesses.

Therefore, businesses should closely monitor developments of the Draft Data Law and its guiding legislation to prepare to comply with the new requirements. Additionally, businesses are advised to actively engage in the law-making process by sending opinions on the Draft Data Law and its guiding legislation prior to their official promulgation. Doing so offers an opportunity to request clarifications or suggest changes to ensure a well-rounded and effective law, as well as enable businesses to anticipate and adapt to the new procedures and compliance requirements that will take effect once the law and its guiding legislation are officially enacted.

As our firm is committed to supporting businesses through this dynamic period, please feel free to reach out to any member of our team of lawyers specializing in data protection and technology if you have any questions or need any assistance.

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