



# Framework, Personal Data Protection Handbook

<b>Project Code</b>	
<b>Document Code</b>	10e-HD/RSK/HDCV/FSOFT
<b>Version</b>	1.0
<b>Effective Date</b>	1-Dec-2024

FPT Software Company, Ltd. ("FPT Software" hereinafter) Corporate Data Protection Policy lays out strict requirements for processing personal data pertaining to customers, business partners, employees or any other individual. It meets the requirements of the European Data Protection Directive and ensures compliance with the principles of national and international data protection laws in force all over the world. The policy sets a globally applicable data protection and security standard for FPT Software and regulates the sharing of information between FPT Software, subsidiaries, and legal entities. FPT Software have established guiding data protection principles – among them transparency, data economy and data security – as FPT Software Personal Data Protection Handbook and ISM guidelines.

FPT Software managers and employees are obligated to adhere to the Corporate Data Protection Policy and observe their local data protection laws. As the Global Data Protection Officer, it is my duty to ensure that the rules and principles of data protection at FPT Software are followed around the world.

I will be pleased to answer any questions you have about data protection and international personal data transfer.

Michael Hering

Global Data Protection Officer, michael.hering@fpt.com, +84 902606236

**PDP Documentation: Management System Mapping, Framework**

This mapping identifies where PDP Handbook meets the requirements of BS 10012:2017/GDPR and where the PDP Handbook templates integrate with the ISO27001: 2013 ISMS Documentation.

PDP Documentation				
Document Name	Doc Ref.	Version	Issued	Document label
Guideline_Pseudonymisation Minimisation and Encryption	14e-HD/SG/HDCV/FSOFT	1.5	01.12.2024	public
Guideline_Complaints and Appeals Handling	03e-HD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Guideline_Data Flow Mapping	08e-HD/SG/HDCV/FSOFT	2.5	01.12.2024	public
Guideline_Data Breach Incident Response	09e-HD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Guideline_Personal Data Protection Policy Development	13e-HD/SG/HDCV/FSOFT	2.5	01.12.2024	public
Guideline_PII Classification and Rating	06e-HD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Guideline_Personal Data Retention	05e-HD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Guideline_Personal Data Protection Organization	02e-HD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Guideline_Personal Data Inventory Management	11e-HD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Guideline_Personal Data Protection Management Audit	12e-HD/SG/HDCV/FSOFT	2.5	01.12.2024	public
Guideline_Data Subject Right Request	09e-HD/RSK/HDCV/FSOFT	1.0	01.12.2024	public
Guideline_Relevant Data Protection Law Regulation Standard	11e-HD/RSK/HDCV/FSOFT	1.0	01.12.2024	public
Guideline_Framework, Personal Data Protection Handbook	10e-HD/RSK/HDCV/FSOFT	1.0	01.12.2024	public
Guideline_Risk Management_DPIA	10e-HD/SG/HDCV/FSOFT	2.5	01.12.2024	public
Extended Personal Data Protection training for PM,AM, DM, SDM	Fsoft online traning platform		28.05.2021	internal use
Personal Data Protection awareness/day one training	<a href="https://ecampus.fpt.com">https://ecampus.fpt.com</a> , Udemy		20.08.2024	internal use
Policy_Personal Data Protection Management	03e-QD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Policy_Personal Data Protection Training	04e-QD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Policy_Privacy Statement	16e-HD/SG/HDCV/FSOFT	3.5	01.12.2024	public
Policy_PIMS Scope	15e-HD/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_privacy	10e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Data Subject Access Request	19e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Retention of Records	11e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Data Protection Impact Assessment	17e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Personal Data Breach Notification	20e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Personal Data Transfer	09e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Personal Data Portability	16e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_consent	15e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_consent withdrawal	14e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Management of Sub-Contracted Processing	21e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_complaints	13e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_competence	12e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_communication	08e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Data Protection Management Review	18e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Procedure_Continual Improvement	23e-QT/SG/HDCV/FSOFT	1.3	01.12.2024	public
Procedure_Internal PDP Audit	24e-QT/SG/HDCV/FSOFT	1.3	01.12.2024	public
Procedure_Third Party Service Contracts Management	22e-QT/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Data Subject Right Request Form	22e-BM/SG/HDCV/FSOFT	2.5	01.12.2024	public
Template_GDPR Example To Measures	38e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Personal Data Protection Exhibit	23e-BM/SG/HDCV/FSOFT	1.7	01.12.2024	public
Template_Personal Data Processing Inventory	17e-BM/SG/HDCV/FSOFT	2.7	01.12.2024	public
Template_Data Processing Agreement	29e-BM/SG/HDCV/FSOFT	1.5	01.12.2024	public
Template_Risk Management DPIA	19e-BM/SG/HDCV/FSOFT	3.5	01.12.2024	public
Template_Risk Management TIA	22e-BM/TT/HDCV/FSOFT	1.3	01.12.2024	public
Template_Checklist_Before Engagement	01e-CL/SG/HDCV/FSOFT	3.5	01.12.2024	public
Template_Standard Contractual Clauses	24e-BM/SG/HDCV/FSOFT	2.5	01.12.2024	public
Template_Rationale DPO	41e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_DPO Job Description	36e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_DP Job Description and Responsibilities	35e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_DPIA Compact	32e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Data Subject Request Incident Compliant Appeal Register	30e-BM/SG/HDCV/FSOFT	1.5	01.12.2024	public
Template_Data Subject Consent Form	21e-BM/SG/HDCV/FSOFT	2.5	01.12.2024	public
Template_Data Subject Consent Withdrawal Form	37e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Parental Consent Form	39e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Parental Consent Withdrawal Form	40e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Privacy Notice Register	33e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Internal Competence Matrix	34e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	internal use
Template_Retention and Disposal Schedule	31e-BM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Template_Personal Data Protection Audit	23e-BM/TT/HDCV/FSOFT	1.2	01.12.2024	public
Template_Internal Audit Report	43e-BM/SG/HDCV/FSOFT	1.3	01.12.2024	public
Template_Internal Audit Schedule	44e-BM/SG/HDCV/FSOFT	1.3	01.12.2024	public
Template_Non Conformance Report	42e-BM/SG/HDCV/FSOFT	1.3	01.12.2024	public
Record_Authorities Key Supplier	01e-DM/SG/HDCV/FSOFT	1.4	01.12.2024	public
Checklist_Data Breach Contact List	DPO only	1.2	01.12.2024	internal use
record_of approval_PDP	DPO only	1	01.12.2024	internal use
Record_retention schedule	DPO only			internal use
Record_DP contacts	DPO only			internal use
Record_internal competence matrix	DPO only			internal use
Record_PDP_Mapping_vX.Y-V.Z	DPO only			internal use
Record_privacy notice register	DPO only			internal use

Record internal contracts | DPO only | | internal use |

**Record of changes**

No	Effective Date	Version	Change Description	Reason	Reviewer ADPO	Final Reviewer GDPO	Approver Board member
1	12/01/2024	1.0	Newly Issued	ISO27701 requirements	Linh Do Thi Dieu	Michael Hering	CFO/COO