



Framework, Personal Data Protection Handbook

Project Code	
Document Code	10e-HD/RSK/HDCV/FSOFT
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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

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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 ISO 27001:2013 ISMS Documentation.

PDP Documentation Document Name	Doc Ref.	BS 10012:2017 Requirements/GDPR	ISO 27001:2013 Requirements	Management system templates compatible with ISO 27001:2013 ISMS Documentation		
				Version	Issued	Document label
Guideline_Pseudonymisation Minimisation and Encryption	14e-HD/SG/HDCV/FSOFT	GDPR, Article 5, 25, 47, 89, Recital 156		1.5	01.12.2024	public
Guideline_Complaints and Appeals Handling	03e-HD/SG/HDCV/FSOFT	GDPR, Article 41, 43, 57, Recital 20, 116, 122, 129, 141, 143		3.5	01.12.2024	public
Guideline_Data Flow Mapping	08e-HD/SG/HDCV/FSOFT	GDPR, Article 30, 36		2.5	01.12.2024	public
Guideline_Data Breach Incident Response	09e-HD/SG/HDCV/FSOFT	GDPR, Article 4, 33, 34		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	GDPR, Article 4, 9		3.5	01.12.2024	public
Guideline_Personal Data Retention	05e-HD/SG/HDCV/FSOFT	GDPR, Article 5		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	GDPR, Article 30		3.5	01.12.2024	public
Guideline_Personal Data Protection Management Audit	12e-HD/SG/HDCV/FSOFT	GDPR, Article 28, 58, 47, 39		2.5	01.12.2024	public
Guideline_Data Subject Right Requests	09e-HD/RSK/HDCV/FSOFT	GDPR, Article 41, 43, 57, Recital 20, 116, 122, 129, 141, 143		1.0	01.12.2024	public
Guideline_Relavant 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	GDPR Article 29, 35, Recital 75		2.5	01.12.2024	public
Extended Personal Data Protection training for PM,AM, DM, SOM	fs0ft online training platform https://ecampus.fpt.com,	GDPR, Article 39			28.05.2021	internal use
Personal Data Protection awareness/day one training	Udemy	GDPR, Article 39			20.08.2024	internal use
Policy_Personal Data Protection Management	03e-QD/SG/HDCV/FSOFT	Clause 5.2, 8.2.9.1, 8.2.12.1		3.5	01.12.2024	public
Policy_Personal Data Protection Training	04e-QD/SG/HDCV/FSOFT	Clause 5.4, 8.2.4, GDPR Article 39		3.5	01.12.2024	public
Policy_Privacy Statement	16e-HD/SG/HDCV/FSOFT	Clause 6.1.3.1, 6.1.3.2, 8.2.6.1, 8.2.6.2, 8.2.6.5, GDPR Article 12, 13, 14		3.5	01.12.2024	public
Policy_PIMS Scope	15e-HD/SG/HDCV/FSOFT	Clause 4.3	Clause 4.3	1.4	01.12.2024	public
Procedure_privacy	10e-QT/SG/HDCV/FSOFT	Clause 6.1.3.1, 6.1.3.2, 8.2.6.1, 8.2.6.2, 8.2.6.5, GDPR Article 12, 13, 14		1.4	01.12.2024	public
Procedure_Data Subject Access Request	19e-QT/SG/HDCV/FSOFT	Clause 8.2.6.1-10jii, 8.2.12.1, 8.2.12.3, 8.2.12.4, 8.2.12.5, 8.2.12.7, GDPR, Article 30		1.4	01.12.2024	public
Procedure_Retention of Records	11e-QT/SG/HDCV/FSOFT	Clause 8.2.10.1, GDPR, Article 5	Control 18.1.3	1.4	01.12.2024	public
Procedure_Data Protection Impact Assessment	17e-QT/SG/HDCV/FSOFT	Clause 6.1.2, 6.1.4, 6.1.5, 6.1.6, 8.2.3, GDPR, Article 35		1.4	01.12.2024	public
Procedure_Personal Data Breach Notification	20e-QT/SG/HDCV/FSOFT	Clause 8.2.11.7, GDPR, Article 30		1.4	01.12.2024	public
Procedure_Personal Data Transfer	09e-QT/SG/HDCV/FSOFT	Clause 8.2.11.8, GDPR Article 44-50		1.4	01.12.2024	public
Procedure_Personal Data Portability	16e-QT/SG/HDCV/FSOFT	Clause 8.2.12.6		1.4	01.12.2024	public
Procedure_consent	15e-QT/SG/HDCV/FSOFT	Clause 8.2.7.2, GDPR, Article 7		1.4	01.12.2024	public
Procedure_consent withdrawal	14e-QT/SG/HDCV/FSOFT	Clause 8.2.6.1-10jiv, GDPR, Article 7		1.4	01.12.2024	public
Procedure_Management of Sub-Contracted Processing	21e-QT/SG/HDCV/FSOFT	Clause 8.2.7.4, 8.2.11.9		1.4	01.12.2024	public
Procedure_complaints	13e-QT/SG/HDCV/FSOFT	Clause 8.2.12.9		1.4	01.12.2024	public
Procedure_competence	12e-QT/SG/HDCV/FSOFT	Clause 7.2, 8.2.4	Clause 7.2	1.4	01.12.2024	public
Procedure_communication	08e-QT/SG/HDCV/FSOFT	Clause 7.4	Clause 7.4	1.4	01.12.2024	public
Procedure_Data Protection Management Review	18e-QT/SG/HDCV/FSOFT	Clause 9.3	Clause 9.3	1.4	01.12.2024	public
Procedure_Continual Improvement	23e-QT/SG/HDCV/FSOFT	Clause 10.2		1.3	01.12.2024	public
Procedure_Internal PDP Audit	24e-QT/SG/HDCV/FSOFT	Clause 9.2		1.3	01.12.2024	public
Procedure_Third Party Service Contracts Management	22e-QT/SG/HDCV/FSOFT		Control 15.1.2, 15.2.1, 15.2.2	1.4	01.12.2024	public
Template_Data Subject Right Request Form	22e-BM/SG/HDCV/FSOFT	Clause 8.2.6.1-10jii, GDPR Article 15-22		2.5	01.12.2024	public
Template_GDPR Example To Measures	38e-BM/SG/HDCV/FSOFT	GDPR/Recital 109		1.4	01.12.2024	public
Template_Personal Data Protection Exhibit	23e-BM/SG/HDCV/FSOFT	GDPR/Recital 109		1.7	01.12.2024	public
Template_Personal Data Processing Inventory	17e-BM/SG/HDCV/FSOFT	GDPR, Article 30		2.7	01.12.2024	public
Template_Data Processing Agreement	29e-BM/SG/HDCV/FSOFT	GDPR/Recital 109		1.5	01.12.2024	public
Template_Risk Management DPIA	15e-BM/SG/HDCV/FSOFT	GDPR, Article 35		3.5	01.12.2024	public
Template_Risk Management TIA	22e-BM/TT/HDCV/FSOFT	GDPR, Article 46		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	GDPR/Recital 109		2.5	01.12.2024	public
Template_Rationale DPO	41e-BM/SG/HDCV/FSOFT	GDPR, Article 37		1.4	01.12.2024	public
Template_DPO Job Description	36e-BM/SG/HDCV/FSOFT	Clause 7.2, 8.2.1.1, 8.2.1.2, 8.2.1.3, 8.2.1.4, 8.2.5, GDPR, Article 37		1.4	01.12.2024	public
Template_DP Job Description and Responsibilities	35e-BM/SG/HDCV/FSOFT	Clause 7.2, 8.2.1.1, 8.2.1.2, 8.2.1.3, 8.2.1.4, 8.2.5, GDPR, Article 37		1.4	01.12.2024	public
Template_DPIA Compact	32e-BM/SG/HDCV/FSOFT	Clause 6.1.2, 6.1.4, 6.1.5, 6.1.6, 8.2.2.1, 8.2.2.2, 8.2.3, 8.2.8.1, GDPR, Article 35		1.4	01.12.2024	public
Template_Data Subject Request Incident Compliant Appeal Register	30e-BM/SG/HDCV/FSOFT	Clause 8.2.11.7, GDPR, Article 30		1.5	01.12.2024	public
Template_Data Subject Consent Form	21e-BM/SG/HDCV/FSOFT	Clause 8.2.7.2-b,		2.5	01.12.2024	public
Template_Data Subject Consent Withdrawal Form	37e-BM/SG/HDCV/FSOFT	Clause 8.2.6.1-10jiv, GDPR, Article 7		1.4	01.12.2024	public
Template_Parental Consent Form	39e-BM/SG/HDCV/FSOFT	Clause 8.2.7.2-b, GDPR, Article 7		1.4	01.12.2024	public
Template_Parental Consent Withdrawal Form	40e-BM/SG/HDCV/FSOFT	Clause 8.2.6.1-10jiv, GDPR, Article 7		1.4	01.12.2024	public
Template_Privacy Notice Register	33e-BM/SG/HDCV/FSOFT	Clause 6.1.3.1, 6.1.3.2, 8.2.6.1, 8.2.6.2, 8.2.6.5, GDPR Article 12, 13, 14	Clause 7.2	1.4	01.12.2024	public
Template_Internal Competence Matrix	24e-BM/SG/HDCV/FSOFT	Clause 7.2	Clause 7.2	1.4	01.12.2024	internal use
Template_Retention and Disposal Schedule	31e-BM/SG/HDCV/FSOFT	Clause 8.2.10.1, GDPR, Article 5		1.4	01.12.2024	public
Template_Personal Data Protection Audit	23e-BM/TT/HDCV/FSOFT	GDPR, Article 28, 58, 47, 39		1.2	01.12.2024	public
Template_Internal Audit Report	43e-BM/SG/HDCV/FSOFT	GDPR, Article 28, 58, 47, 39		1.3	01.12.2024	public
Template_Internal Audit Schedule	44e-BM/SG/HDCV/FSOFT	GDPR, Article 28, 58, 47, 39		1.3	01.12.2024	public
Template_Non Conformance Report	42e-BM/SG/HDCV/FSOFT	Clause 10.1		1.3	01.12.2024	public
Record_Authorities Key Supplier	01e-QM/SG/HDCV/FSOFT		Control 6.1.3, 6.1.4	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