

## ASIA TMT BULLETIN

September 2025

We have just returned from the Linklaters TMT/IP global offsite in Cannes. It was great to connect with colleagues across the network while exchanging ideas on emerging trends in our sector!

Asian technology regulation continues to evolve rapidly, as is evident from this issue of our bulletin. China has introduced a new cybersecurity incident reporting regime, while Vietnam is consulting on significant changes to rules for cross-border data and digital technology incentives. Singapore is enhancing its digital landscape with new guidelines for online financial advertising. Regional regulators remain focused on data protection and AI governance, with recent enforcement action against facial recognition use in Australia serving as a reminder of compliance risks.



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### Data Privacy



**VIETNAM**, September 2025

#### Draft Decree guiding the Law on Personal Data Protection open for public consultation

Released for public consultation, the [draft Decree guiding the Law on Personal Data Protection](#) includes guidance on exemptions from the requirement to undertake offshore transfer impact assessments for transfers originating from Vietnam, criteria for valid consents, and data protection guidance for the blockchain and banking sectors.

### Cybersecurity



**THAILAND**, September 2025

#### New list of Critical Information Infrastructure Organisations

National Cyber Security Agency published a [notification](#) setting out a revised list of organisations in the finance, transport, health and energy sectors that are deemed critical information infrastructure organisations. These organisations will be subject to various cybersecurity regulations.

### Digital Transformation



**HONG KONG SAR**, September 2025

#### LegCo Chief Executive delivers address on innovation policy initiatives

The address [outlines key initiatives](#) for the Innovation and Industry Bureau, including enhancing the innovation and technology ecosystem, promoting the development of the digital economy in a smart city, and supporting national development while strengthening Hong Kong's role bridging to mainland China.

### Data Privacy



**HONG KONG SAR**, September 2025

#### Privacy Commissioner for Personal Data signs global joint statement on trustworthy data governance

The Privacy Commissioner [signed a statement](#) with 20 global privacy authorities, committing to information sharing, cooperation, and addressing data security and governance challenges from AI. The statement promises promotion of AI development, policy implementation, and internal collaboration for AI security.

### Intellectual Property



**CHINA**, September 2025

#### Court rules on copyright in AI-generated images

The Beijing Internet Court [ruled](#) that whilst copyright can subsist in AI-generated images, creators using such AI tools must demonstrate evidence of their creative effort. This includes maintaining detailed generation records, including prompts, sketches, and modification records of the images.

### Digital Economy



**SINGAPORE**, September 2025

#### New guidelines for online financial content

The Monetary Authority of Singapore has [published guidelines](#) on responsible and professional digital advertising for banks, insurers, fund management companies and brokerages. The guidelines, which become effective on 25 March 2026, set out safeguards that organisations should adopt to avoid misleading advertising.

### Data Privacy



**INDONESIA**, September 2025

#### Proposed amendment to the Personal Data Protection Law

The Indonesian parliament announced plans to amend the Personal Data Protection Law in its 2026 priority legislation programme. The law became effective in October 2024 but there is currently no implementing regulation and the mandated supervisory institution has not been established.

### Artificial Intelligence



**UAE**, September 2025

#### Autonomous driving companies granted trial permits

Dubai's Road and Transport Authority has granted [permits to three companies to conduct autonomous driving trials](#) on Dubai roads. The permits support Dubai's move towards autonomous mobility solutions as part of the Smart Self-Driving Transport Strategy.

### Digital Economy



**VIETNAM**, September 2025

#### Draft guidance open for public consultation on the digital technology industry

The draft [Decree guiding the Law on Digital Technology Industry](#) was released for public consultation. The draft proposes guidelines to attract talent in digital technology and a pilot programme for incentives to parties offering products and services which utilise digital technology.

### Cybersecurity



**CHINA**, September 2025

#### Strict cybersecurity incident reporting regime takes effect

The Cyberspace Administration of China [released](#) the Administrative Measures for National Cybersecurity Incident Reporting, with effect from 1 November 2025. It establishes stringent reporting requirements for network operators experiencing "relatively severe" cybersecurity incidents, with timelines ranging from 1-4 hours.

### Digital Assets



**THAILAND**, September 2025

#### Pilot programme enabling tourists to exchange digital assets for Thai Baht

The Thai Securities and Exchange Commission has launched a [pilot programme](#) allowing licensed digital asset operators to provide tourists with the ability to exchange their digital assets for Thai Baht.

### Recent Sanctions



**AUSTRALIA**, September 2025

#### Privacy Commissioner finds retail store's use of facial recognition technology unlawful

The Privacy Commissioner [determined](#) that a retail store breached privacy legislation by using a CCTV-backed facial recognition system which indiscriminately collected biometric data. The Privacy Commissioner concluded that the system was disproportionate because there are less intrusive measures available to address refund fraud.

## KEY CONTACTS



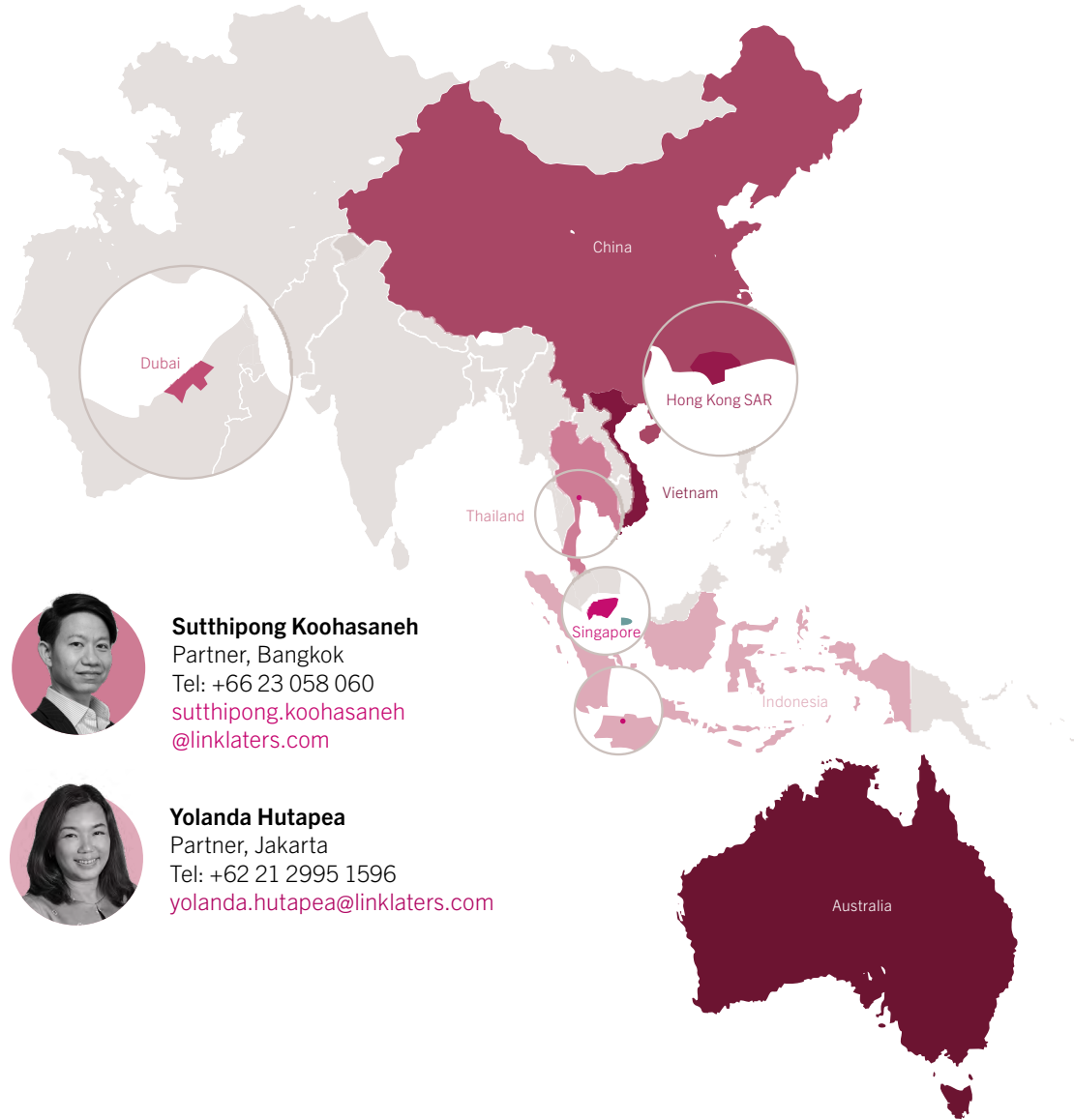
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