



Employee Data Privacy – China

Data Protection Officer

What is, and which organizations have to appoint a DPO?

A Data Protection Officer (DPO) is a person in charge of verifying the compliance of personal data processing with the applicable law. The DPO communicates information on processing personal data such as its: purposes, interconnections, types, categories of data subjects, length of retention and department(s) in charge of implementing processing. DPOs may be required by law or recommended.

The People’s Republic of China’s (PRC’s) Personal Information Protection Law (PIPL) requires controllers (such as employers processing employee data) to appoint a Personal Information Protection Officer (PIPO) only if the entity processes more than a certain threshold of personal data. The threshold has not yet been set.

When a PIPO is required, the designated person will be responsible for supervising personal information processing activities and protective measures.

Those who handle personal information should disclose the methods to contact PIPOs as well as report the names of the officers and contact methods to the departments fulfilling personal information protection responsibilities.



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