



**HFW**

**CYBERSECURITY, CROSS-  
BORDER DATA & COMPLIANCE**

**REGULATORY CHANGES |  
BUSINESS IMPACTS**

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## AGENDA

- BRIEF HISTORY
  - KEY DEVELOPMENTS
  - BUSINESS CONCERNS
  - ENFORCEMENT
  - BEST PRACTICES
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## BRIEF HISTORY Perspectives

- 2000-2015
    - ✓ China starts focusing on building out its own concept of digitalization/digital economy to address rapid adoption
    - ✓ Priorities?
    - ✓ The National Security Law
  - 2015 to 2019
    - ✓ The NPC begins deliberating the Cybersecurity Law in earnest
    - ✓ The regulatory framework takes shape
    - ✓ Who's who? CAC | TC260 | MIIT | PSB/MPS | SAMR
  - 2019 to now, and beyond
    - ✓ Implementation and overhaul
    - ✓ DSL | PIPL | Civil Code | Industry Specific Regulations | Guiding Documents
-



## KEY DEVELOPMENTS

### Big shifts in the regulatory landscape

- Data Security Law
    - ✓ Sets out more foundational pieces of framework on important/core/critical data
    - ✓ Long arm?
  - Personal Information Protection Law
    - ✓ Self-explanatory – China’s quasi-GDPR
    - ✓ Long arm?
  - Civil Code
    - ✓ Enshrines privacy/personality rights
  - Multi-Level Protection Scheme (2.0)
    - ✓ Hundreds of pages of dense, technical Chinese covering risk classifications and associated network security requirements/standards
  - Other Guiding Documents
    - ✓ A constellation of guidelines, industry-specific regulations, etc.
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## **BUSINESS CONCERNS** **What matters to you?**

- Data scope
  - Data location
  - Sensitivity
  - Important/Critical Data?
  - CIIO?
  - Access/Security
  - Transfer
  - Third parties?
  - Data incidents
  - Liabilities
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**ENFORCEMENT**  
**Who are they going after?**

- A handful of high profile Chinese companies
  - Lots of lower-level enforcement against Chinese tech/mobile companies
  - What kind of violations?
  - Punishments?
  - Foreign companies?
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**BEST PRACTICES**  
**Easy wins, long-term moves**

- Get your team aligned
  - Internal/external audits and security assessments & remedies
  - Get your policy house in order
  - Calm down
  - Get ready to have some exciting interactions with regulators
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**Americas | Europe | Middle East | Asia Pacific**





## GLOBAL REACH

MIDDLE EAST | ASIA PACIFIC | AMERICAS | EUROPE

- Abu Dhabi
- British Virgin Islands
- Brussels
- Dubai
- Geneva
- Hong Kong
- Houston
- Kuwait
- London
- Melbourne
- Monaco
- Paris
- Perth
- Piraeus
- Rio de Janeiro
- Riyadh
- São Paulo
- Shanghai
- Singapore
- Sydney

