

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
I	General Provisions	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
I.1	General Provisions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
I.1-1	General Provisions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
I.1-2	General Provisions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
I.2	General Provisions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
I.3	General Provisions	A data subject shall be able to exercise the following rights with regard to his/her personal data and such rights shall not be waived or limited contractually in advance:	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
I.3.1	General Provisions	the right to make an inquiry of and to review his/her personal data;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
I.3.2	General Provisions	the right to request a copy of his/her personal data;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
I.3.3	General Provisions	the right to supplement or correct his/her personal data;	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
I.3.4	General Provisions	the right to demand the cessation of the collection, processing or use of his/her personal data; and	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
I.3.5	General Provisions	the right to erase his/her personal data.	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
I.4	General Provisions	Whoever is commissioned by government agencies or non-government agencies to collect, process or use personal data shall be deemed to be acting on behalf of the commissioning agency to the extent that the PDPA applies.	Functional	No Relationship	N/A	N/A	N/A	0	
I.5	General Provisions	The collection, processing and use of personal data shall be carried out in a way that respects the data subject's rights and interest, in an honest and good-faith manner, shall not exceed the necessary scope of specific purposes, and shall have legitimate and reasonable connections with the purposes of collection.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	5	

NIST IR 8477-Based Set Theory Relationship Mapping (STRM)

Reference Document: Secure Controls Framework (SCF) version 2026.2

STRM Guidence: <https://securecontrolsframework.com/start-here/set-theory-relationship-mapping-strm/>

Focal Document: **Taiwan - Personal Data Protection Act (PDPA) (2025)**

Focal Document URL: <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=I0050021>

Published STRM URL: <https://content.securecontrolsframework.com/strm/scf-strm-apac-twn-pdpa-2025.pdf>

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1.6	General Provisions	Data pertaining to a natural person's medical records, healthcare, genetics, sex life, physical examination and criminal records shall not be collected, processed or used unless on any of the following bases:	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1.6.1	General Provisions	where it is expressly required by law;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1.6.2	General Provisions	where it is within the necessary scope for a government agency to perform its statutory duties or for a non-government agency to fulfill its statutory obligation, provided that proper security and maintenance measures are adopted prior or subsequent to such collection, processing or use of personal data;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1.6.3	General Provisions	where the personal data has been manifestly made public by the data subject or publicized legally;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1.6.4	General Provisions	where it is necessary for statistics gathering or academic research by a government agency or an academic institution for the purpose of healthcare, public health, or crime prevention, provided that such data, as processed by the data provider or as disclosed by the data collector, may not lead to the identification of a specific data subject;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1.6.5	General Provisions	where it is necessary to assist a government agency in performing its statutory duties or a non-government agency in fulfilling its statutory obligations, provided that proper security and maintenance measures are adopted prior or subsequent to such collection, processing, or use of personal data; or	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1.6.6	General Provisions	where the data subject has consented to the collection, processing and use of his/her personal data in writing, except where the collection, processing or use exceeds the necessary scope of the specific purpose, or where the collection, processing or use based solely on the consent of the data subject is otherwise prohibited by law, or where such consent is not given by the data subject out of his/her free will. Articles 8 and 9 shall apply mutatis mutandis to the collection, processing, or use of personal data in accordance with the preceding paragraph; paragraphs 1, 2 and 4 of Article 7 shall apply mutatis mutandis to the consent required under subparagraph 6 of the preceding paragraph.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1.7	General Provisions	"Consent", as referred to in subparagraph 2, paragraph 1 of Article 15 and subparagraph 5, paragraph 1 of Article 19, means a declaration of agreement given by a data subject after he/she has been informed by the data collector of the information required under the PDPA. "Consent", as referred to in subparagraph 7, paragraph 1 of Article 16 and subparagraph 6, paragraph 1 of Article 20, means a separate declaration of agreement given by a data subject after he/she has been informed by the data collector of any of the purposes other than that originally specified, the scope of other use, and the impact of giving or not giving consent on the rights and interests of the data subject. The data subject's consent may be presumed given pursuant to subparagraph 2, paragraph 1 of Article 15 and subparagraph 5, paragraph 1 of Article 19 if the data subject does not indicate his/her objection and affirmatively provides his/her personal data after the government or non-government agency has informed the data subject of the relevant information specified in paragraph 1 of Article 8 of the PDPA. The data collector shall bear the burden of proof regarding the fact that the data subject has given the consent prescribed under the PDPA.	Functional	Intersects With	Data Subject Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, receipt, processing, storage, transmission, sharing, updating and/or disposal of their Personal Data (PD), where the data subject is provided, prior to collection, with: (1) Plain language explaining the potential data privacy risks of the authorization; (2) A means to decline the authorization; and (3) Necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	5	
1.8-1	General Provisions	Government or non-government agencies shall expressly inform the data subject of the following information when collecting their personal data in accordance with Article 15 or 19 of the PDPA:	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
1.8.1-1	General Provisions	the name of the government or non-government agency;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
1.8.2-1	General Provisions	the purpose of the collection;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.

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I.8.3-1	General Provisions	the categories of the personal data to be collected;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.4-1	General Provisions	the time period, territory, recipients, and methods of which the personal data is used;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.5-1	General Provisions	the data subject's rights under Article 3 and the methods for exercising such rights; and	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.6-1	General Provisions	the data subject's rights and interests that will be affected if he/she elects not to provide his/her personal data.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8-2	General Provisions	The obligation to inform as prescribed in the preceding paragraph may be waived under any of the following circumstances:	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.1-2	General Provisions	where notification may be waived in accordance with the law;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.2-2	General Provisions	where the collection of personal data is necessary for the government agencies to perform their statutory duties or the non-government agencies to fulfill their statutory obligation;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.

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I.8.3-2	General Provisions	where giving notice will prevent the government agencies from performing their statutory duties;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.4-2	General Provisions	where giving notice will harm public interests;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.5-2	General Provisions	where the data subject has already known the content of the notification; or	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.8.6-2	General Provisions	where the collection of personal data is for non-profit purposes and clearly has no adverse effect on the data subject.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	An additional numbering was added to the end of the control number to improve mappability because the FD has multiple series of the same bullet points.
I.9	General Provisions	Government or non-government agencies shall, before processing or using the personal data collected in accordance with Article 15 or 19 which was not provided by the data subject, inform the data subject of their source of data and other information specified in subparagraphs 1 through 5, paragraph 1 of the preceding article. The obligation to inform as prescribed in the preceding paragraph may be exempt under any of the following circumstances: The obligation to inform as prescribed in paragraph 1 may be performed at the time of the first use of the personal data towards the data subject.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
I.9.1	General Provisions	under any of the circumstances provided in paragraph 2 of the preceding article;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
I.9.2	General Provisions	where the personal data has been manifestly made public by the data subject or publicized legally;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	

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I.9.3	General Provisions	where it is unable to inform the data subject or his/her legal representative;	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
I.9.4	General Provisions	where it is necessary for statistics gathering or academic research in pursuit of public interests, provided that such data, as processed by the data provider or as disclosed by the data collector, may not lead to the identification of a specific data subject; or	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
I.9.5	General Provisions	where the personal data is collected by mass communication enterprises for the purpose of news reporting for the benefit of public interests.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
I.10	General Provisions	Upon the request of a data subject, the government or non-government agency shall reply to the data subject's inquiry, allow the data subject to review the personal data collected, or provide the data subject with a copy thereof except under any of the following circumstances:	Functional	Intersects With	Data Subject Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns and/or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
I.10.1	General Provisions	where national security, diplomatic or military secrets, overall economic interests or other material national interests may be harmed;	Functional	Intersects With	Data Subject Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns and/or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
I.10.2	General Provisions	where a government agency may be prevented from performing its statutory duties; or	Functional	Intersects With	Data Subject Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns and/or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
I.10.3	General Provisions	where the vital interests of the data collectors or any third parties may be adversely affected.	Functional	Intersects With	Data Subject Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns and/or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
I.11	General Provisions	A government or non-government agency shall ensure the accuracy of personal data in its possession and correct or supplement such data on its own initiative or upon the request of data subjects. In the event of a dispute regarding the accuracy of the personal data, the government or non-government agency shall, on its own initiative or upon the request of the data subject, cease processing or using the personal data, unless the processing or use is either necessary for the performance of an official or business duty, or has been agreed to by the data subject in writing, and the dispute has been recorded. When the specific purpose of data collection no longer exists, or upon expiration of the relevant time period, government or non-government agencies shall, on their own initiative or upon the request of the data subject, erase or cease processing or using the personal data, unless the processing or use is either necessary for the performance of an official or business duty, or has been agreed to by the data subject in writing. Government or non-government agencies shall, on their own initiative or upon the request of the data subject, erase the personal data collected or cease collecting, processing or using the personal data in the event where the collection, processing or use of the personal data is in violation of the PDPA. If any failure to correct or supplement any personal data is attributable to a government or non-government agency, the government or non-government agency shall notify the persons who have been provided with such personal data after the correction or supplement is made.	Functional	Intersects With	Personal Data (PD) Accuracy & Integrity	PRI-05.2	Mechanisms exist to ensure the accuracy and relevance of Personal Data (PD) throughout the information lifecycle by: (1) Keeping PD up-to-date; and (2) Remediating identified inaccuracies, as necessary.	5	
I.12	General Provisions	When a government or non-government agency becomes aware that the personal data it holds has been stolen, altered, damaged, lost, or leaked, it shall notify the data subject. Where the circumstances described under the preceding paragraph fall within a specified scope of report, the government or non-government agency shall submit reports to the following authorities: Under the circumstances described under Paragraph 1, the government or non-government agency shall take immediate and effective countermeasures to prevent the incident from escalating, document the relevant facts, impacts, and response measures taken, and preserve the relevant records for inspection by the competent authority. The regulations on the content, method, time limit, and scope of notification or reporting, countermeasures, record retention, and other relevant matters under the preceding three paragraphs shall be prescribed by the competent authority.	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	
I.12.1	General Provisions	Government agencies shall submit reports to the competent authority and the authorities designated under Paragraph 1, Article 21-1 to receive reports on their implementation status.	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	
I.12.2	General Provisions	Non-government agencies shall submit reports to the competent authority. Upon receiving the reports, the competent authority shall also inform the authorities in charge of the industries concerned.	Functional	Intersects With	Incident Stakeholder Reporting	IRO-10	Mechanisms exist to timely-report incidents to applicable: (1) Internal stakeholders; (2) Affected clients & third-parties; and (3) Regulatory authorities.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
I.13	General Provisions	Where a request is made by a data subject to a government or non-government agency pursuant to Article 10, the agency shall determine whether to accept or reject such request within fifteen days; such deadline may be extended by up to fifteen days if necessary, and the data subject shall be notified in writing of the reason for the extension. Where a request is made by a data subject to a government or non-government agency pursuant to Article 11, the agency shall determine whether to accept or reject such request within thirty days; such deadline may be extended by up to thirty days if necessary, and the data subject shall be notified in writing of the reason for the extension.	Functional	No Relationship	N/A	N/A	N/A	0	
I.14	General Provisions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
II	Data Collection, Processing and Use by a Government Agency	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
III	Data Collection, Processing and Use by a Non-government Agency	N/A	Functional	No Relationship	N/A	N/A	N/A	0	
III.19	Data Collection, Processing and Use by a Non-government Agency	Except for the personal data specified under paragraph 1 of Article 6, the collection or processing of personal data by non-government agencies shall be for specific purposes and on one of the following bases: A data collector or processor shall, on its own initiative or upon the request of the data subject, erase or cease processing or using the personal data when it becomes aware of, or upon being notified by the data subject, that the processing or use of the personal data should be prohibited pursuant to the proviso to subparagraph 7 of the preceding paragraph.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.1	Data Collection, Processing and Use by a Non-government Agency	where it is expressly required by law;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.2	Data Collection, Processing and Use by a Non-government Agency	where there is a contractual or quasi-contractual relationship between the non-government agency and the data subject, and proper security measures have been adopted to ensure the security of the personal data;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.3	Data Collection, Processing and Use by a Non-government Agency	where the personal data has been manifestly made public by the data subject or publicized legally;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.4	Data Collection, Processing and Use by a Non-government Agency	where it is necessary for statistics gathering or academic research by an academic institution in pursuit of public interests, provided that such data, as processed by the data provider or as disclosed by the data collector, may not lead to the identification of a specific data subject;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.5	Data Collection, Processing and Use by a Non-government Agency	where consent has been given by the data subject;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.6	Data Collection, Processing and Use by a Non-government Agency	where it is necessary for furthering public interests;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.7	Data Collection, Processing and Use by a Non-government Agency	where the personal data is obtained from publicly available sources unless the data subject has an overriding interest in prohibiting the processing or use of such personal data; or	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.19.8	Data Collection, Processing and Use by a Non-government Agency	where the rights and interests of the data subject will not be infringed upon.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20	Data Collection, Processing and Use by a Non-government Agency	Except for the personal data specified in paragraph 1 of Article 6, non-government agencies shall use personal data only within the necessary scope of the specific purpose of collection; the use of personal data for another purpose shall be only on any of the following bases: When a non-government agency uses personal data for marketing purpose pursuant to the preceding paragraph, upon the data subject's objection to such use, the agency shall cease using the data subject's personal data for marketing. Non-government agencies, when using the data subject's personal data for marketing purpose for the first time, shall provide the data subject the ways that he/she can object to such use, and the agency shall pay for the fees therefrom.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20.1	Data Collection, Processing and Use by a Non-government Agency	where it is expressly required by law;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20.2	Data Collection, Processing and Use by a Non-government Agency	where it is necessary for furthering public interests;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20.3	Data Collection, Processing and Use by a Non-government Agency	where it is to prevent harm to the life, body, freedom, or property of the data subject;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
III.20.4	Data Collection, Processing and Use by a Non-government Agency	where it is to prevent material harm to the rights and interests of others;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20.5	Data Collection, Processing and Use by a Non-government Agency	where it is necessary for statistics gathering or academic research by a government agency or an academic institution for public interests; provided that such data, as provided by the data provider or disclosed by the data collector, may not lead to the identification of a specific data subject;	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20.6	Data Collection, Processing and Use by a Non-government Agency	where consent has been given by the data subject; or	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20.7	Data Collection, Processing and Use by a Non-government Agency	where it is for the data subject's rights and interests..	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
III.20-1	Data Collection, Processing and Use by a Non-government Agency	Non-government agencies possessing personal data files shall implement security and maintenance measures to prevent the theft, alteration, damage, loss, or leakage of personal data. The regulations on the security and maintenance, management mechanisms, measures to be taken, and other related matters concerning personal data files as referred to under the preceding paragraph shall be prescribed by the competent authority.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	5	
III.21	Data Collection, Processing and Use by a Non-government Agency	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
III-1	Administrative Supervision	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
IV	Damages and Class Action	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
V	Penalties	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	
VI	Supplementary Provisions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	