

Data Protection Officer ("DPO") Competency Guidelines

Malaysia's New Framework

Defining DPO Roles, Competency, and Professional Accountability



Advisory & Support



Risk Management



Compliance & Oversight
Monitoring



Audit & Reporting



Communication &
Stakeholder
Engagement



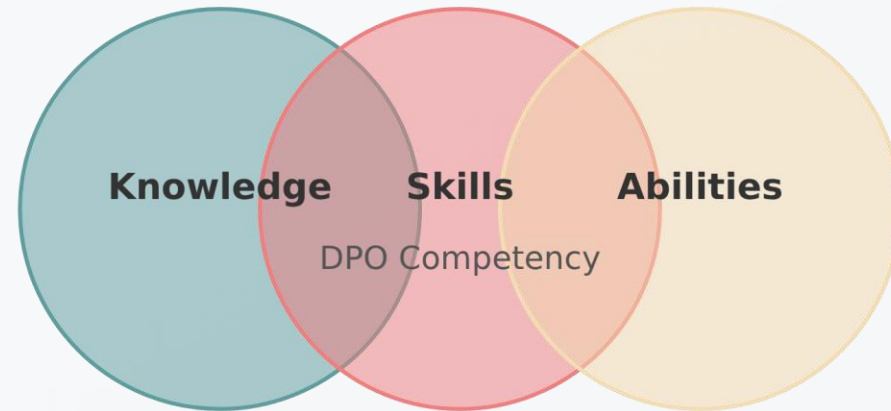
Regulatory & Data
Subject Management

Knowledge

Skills

Abilities

The KSA Model Foundation



Knowledge (K)

What the DPO must understand about personal data protection laws, regulations, and best practices.



Skills (S)

What the DPO must be able to do to ensure compliance with regulatory requirements.



Abilities (A)

The capacity to apply knowledge and skills effectively in practice to ensure compliance.



These KSAs are applied across all six competency areas to ensure DPOs can translate regulatory requirements into practical compliance.

Six Core Competency Areas

Every DPO must master these 6 core competency areas to effectively discharge their responsibilities under the Personal Data Protection Act 2010 and the Amendment Act 2024 (“PDPA”):



Advisory & Support

Provide guidance on personal data protection issues and support the application of personal data protection laws to the organization.



Risk Management & Assessment

Identify, assess, and mitigate risks associated with personal data processing across the data lifecycle.



Compliance Oversight & Monitoring

Oversee and monitor compliance with personal data protection laws and internal policies.



Audit & Reporting

Conduct internal audits, maintain records, and prepare compliance reports.



Communication & Engagement

Conduct training and engage with stakeholders to ensure compliance with personal data protection and security practices.



Regulatory & Data Subject Management

Act as liaison with the Commissioner and manage data subject queries or request and personal data breaches.

Each competency represents a critical function ensuring accountability, transparency, and a data protection culture.

Advisory & Support And Risk Management Competencies



Advisory & Support



Knowledge

- Understanding the key provisions of the PDPA, as well as related regulations and guidelines.
- Understanding of DPO's role and responsibilities.



Skills

- Review contracts for personal data protection clauses.
- Explain PDPA requirements to stakeholders.
- Prepare reports and summarizes on personal data protection obligations.



Abilities

- Identify personal data protection risks in contracts.
- Translate legal requirements to practical procedures and provides actionable compliance advice.



Risk Management & Assessment



Knowledge

- Understand the purpose and requirements of Data Protection Impact Assessments (“**DPIAs**”) and Transfer Impact Assessments (“**TIAs**”).
- Identify common personal data-related risks across organizational functions.
- Stay updated on emerging personal data security and data protection trends.
- Manage personal data incident response and breach notifications.



Skills

- Conduct DPIAs and TIAs.
- Analyze risks in personal data flows and processing activities.
- Balance personal data protection risks with business objectives.



Abilities

- Recommend practical risk mitigation strategies from DPIAs and TIAs findings.
- Coordinate personal data breach responses.

Compliance, Audit & Communication Competencies



Compliance Oversight & Monitoring

Knowledge

Understands duties of data controllers/processors, data subject rights, personal data lifecycle management, and compliance with enforcement requirements.

Skills

Maps personal data processing activities and develops document policy in accordance with the PDPA.

Abilities

Monitors and enforces compliance, oversees personal data handling, improves personal data protection processes, and executes personal data breach notifications.



Audit & Reporting

Knowledge

Understands record-keeping obligations and personal data lifecycle concepts under the PDPA.

Skills

Maintains records and documentation, communicates audit matters, and implements record-keeping and reporting practices.

Abilities

Conducts internal audits, document and report personal data protection risks, and recommends suitable personal data classification and retention measures.



Communications & Engagement

Knowledge

Understands the importance of compliance with the PDPA and how personal data protection integrates into corporate governance.

Skills

Facilitates effective communication among stakeholders on personal data protection matters.

Abilities

Delivers basic personal data protection training, fosters a personal data protection culture, and embeds personal data protection into daily operations.



These competencies ensure accountability and transparency in the organization's personal data protection practices.

Regulatory & Data Subject Management

🛡️ The DPO serves as the key point of contact with the Personal Data Protection Commissioner and manages data subject requests and breach notifications.



Regulatory Relationship

- ✓ Act as primary liaison with the Personal Data Protection Commissioner.
- ✓ Ensure timely notification of personal data breach.
- ✓ Prepare regulatory compliance reports.



Data Subject Management

- ✓ Handle data subject queries and complaints.
- ✓ Process access and correction requests.
- ✓ Manage data subject opt-ins and opt-outs.

Knowledge, Skills & Abilities Framework

Knowledge

- > Data subject rights
- > Registration requirements

Skills

- > Strategic thinking
- > Clear communication

Abilities

- > Regulatory compliance
- > Request management