Soft but Ethical: The ASEAN Way to Data Protection and AI Governance

PANEL 2 | Surveillance and Privacy in Digital Development

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Soft but Ethical: The ASEAN Way to Data Protection and AI Governance

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This paper explores how Southeast Asian countries, individually and through ASEAN, approach data protection and AI governance using a largely "soft but ethical" model. Amid rapid digital transformation, ASEAN's strategy emphasizes non-binding frameworks that promote trust, privacy, and human-centric innovation. Anchored by the ASEAN Digital Masterplan 2025, member states are adopting voluntary, principle-based policies to strengthen cross-border data flows and AI governance without imposing rigid legal mandates. While these soft-law instruments foster regulatory flexibility and regional interoperability, challenges remain, including legal fragmentation, lack of enforceable safeguards, and rising concerns over AI misuse. As AI applications become more pervasive, calls for stronger, harmonized legal frameworks are intensifying. The paper argues that ASEAN must balance innovation with binding safeguards to ensure ethical AI deployment and reinforce trust in regional digital ecosystems. Data protection remains central to this evolving governance landscape.

Introduction

Personal data protection is increasingly becoming more important in artificial intelligence (AI) strategies and governance measures, especially since the technology relies on vast amounts of data. In Southeast Asia, ASEAN member states have been incorporating data privacy laws into their broader digitalization efforts and policies. This reflects the region's continued commitment to technological development that remains ethical and human centered. For general economic purposes, driving competitiveness, innovation, and growth within the private sector (including tech companies) and investors are the key priority. Meanwhile, development programming targets inclusive and sustainable development outcomes through cooperation with governments, NGOs, international development agencies, and local communities. In this piece, we examine both general and development facets of AI regulation, as well as the interconnectedness of data protection with AI governance, both evolving pursuits in the region.

The ASEAN Digital Masterplan 2025

The ASEAN Digital Masterplan 2025 (ADM 2025),[1] sets out a vision for building a resilient and inclusive digital future for the region, with a strong focus on promoting trusted digital services. A key pillar of this effort is the strengthening of data privacy and security frameworks. ADM 2025 rightly positions data protection and privacy as critical enablers of cross-border digital trade by fostering user trust and supporting the eventual interoperability of standards with frameworks such as the APEC Cross-Border Privacy Rules (CBPR),[2] and the European Union's General Data Protection Regulation (GDPR).[3] These priorities reflect an important step toward harmonized governance across ASEAN.

However, the ambition of ADM 2025 is not backed by a binding legal instrument. Instead, it encourages ASEAN Member States (AMS),[4] to build upon non-binding instruments such as the ASEAN Framework on Personal Data Protection (2016),[5] and the Framework on Digital

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[1] The Association of Southeast Asian Nations, "ASEAN Digital Masterplan 2025," ASEAN Main Portal, September 2021, https://asean.org/wp-content/uploads/2021/09/ASEAN-Digital-Masterplan-EDITED.pdf

[2] InfoComm Media Development Authority, "About APEC Cross Border Privacy Rules (CBPR)," IMDA, May 17, 2024, https://www.imda.gov.sg/how-we-can-help/cross-border-privacy-rules-certification.

[3] Intersoft consulting, "General Data Protection Regulation (GDPR) – Legal Text," General Data Protection Regulation (GDPR) (intersoft consulting, May 25, 2018), https://gdpr-info.eu/

[4] Association of Southeast Asian Nations, "Member States," ASEAN (2025 ASEAN Secretariat, October 19, 2020), https://asean.org/member-states/.

[5] ASEAN, "Framework on Personal Data Protection," *ASEAN Telecommunications and Information Technology Ministers Meeting*, November 25, 2016, https://asean.org/wp-content/uploads/2012/05/10-ASEAN-Framework-on-PDP.pdf.

Data Governance.[6] While these documents promote harmonized, principles-based data protection regulations and frameworks, covering issues like data management and cross-border flows, they remain voluntary. The ASEAN Framework on Personal Data Protection,[7] explicitly states that it does not create legally binding obligations under domestic or international law. Similarly, the Framework on Digital Data Governance,[8] outlines strategic priorities (such as managing the data lifecycle, enabling cross-border data flows, and regulating emerging technologies) and introduces initiatives like the ASEAN Data Classification Framework (now renamed as ASEAN Data Management Framework),[9] and the ASEAN Cross Border Data Flows Mechanism,[10] These are framed as guides, not enforceable mandates, and AMS are only expected to "endeavor" to implement the principles in national regulations.

ADM 2025 also refers to the Implementing Guidelines for the ASEAN Cross Border Data Flows Mechanism (2021),[11] and the ASEAN Data Management Framework (DMF),[12] as tools to facilitate regional data flows. The DMF is particularly aimed at helping SMEs establish robust data governance systems, with safeguards applied across the data lifecycle. However, like other ASEAN frameworks, it remains non-binding and does not create legal rights or obligations.

Despite these initiatives, key regulatory challenges persist in ASEAN's data governance landscape, as highlighted by recent analyses from the Economic Research Institute for ASEAN and East Asia (ERIA).[13] First, opacity in data protection regulations across member

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[6] ASEAN, "Framework on Digital Data Governance," ASEAN Telecommunications and Information Technology Ministers Meeting, December 6, 2018, https://asean.org/wp-content/uploads/2012/05/6B-ASEAN-Framework-on-Digital-Data-Governance_Endorsedv1.pdf.
[7] ASEAN, "Framework on Personal Data Protection," *ASEAN Telecommunications and Information Technology Ministers Meeting*, November 25, 2016, https://asean.org/wp-content/uploads/2012/05/10-ASEAN-Framework-on-PDP.pdf.
[8] ASEAN, "Framework on Digital Data Governance," ASEAN Telecommunications and Information Technology Ministers Meeting, December 6, 2018, https://asean.org/wp-content/uploads/2012/05/6B-ASEAN-Framework-on-Digital-Data-Governance_Endorsedv1.pdf.
[9] ASEAN, "Data Governance and Protection throughout the Data Lifecycle," ASEAN Data Management Framework (ASEAN, January 2021), https://asean.org/wp-content/uploads/2-ASEAN-Data-Management-Framework_Final.pdf.
[10] ASEAN, "ASEAN Data Management Framework and ASEAN Cross Border Data Flows Mechanism," *1st ASEAN Digital Ministers' Meeting (ADGMIN) 2020* (ASEAN, January 2021), https://asean.org/wp-content/uploads/2021/08/Implementing-Guidelines-for-ASEAN-Data-Management-Framework-and-Cross-Border-Data-Flows.pdf.
[11] Ibid.
[12] ASEAN, "Data Governance and Protection throughout the Data Lifecycle," ASEAN Data Management Framework (ASEAN, January 2021), https://asean.org/wp-content/uploads/2-ASEAN-Data-Management-Framework_Final.pdf.
[13] Shota Watanabe, Ema Ogura, and Keita Oikawa, "Current Status of ASEAN Data Governance and Its Implications for the Digital Economy Framework Agreement," ERIA Discussion Paper Series, January 2025, https://www.eria.org/uploads/Current-Status-of-ASEAN-Data-Governance-and-Its-Implications-for-the-DEFA.pdf

states creates legal uncertainty and drives up compliance costs, particularly due to the absence of a centralized repository of data governance mechanisms. Second, the absence of standardized protections, such as uniform recognition of data subject rights and rules for government access to data, undermines trust and interoperability. Third, overly burdensome regulatory measures, including data localization requirements and inconsistent adequacy criteria, hinder cross-border operations and increase operational complexity for businesses.

While the ASEAN approach is intended to support economic growth, it may also create gaps such as legal uncertainty and lack of rights-based protections. Moreover, trade-led mechanisms may disproportionately disadvantage vulnerable groups, typically those with very limited bargaining power, such as recipients of social and health assistance. Without development-led regulation, vulnerable groups may not have negotiating power on how their data is collected, analyzed, shared, or used by entities in power. Overall, ASEAN's voluntary frameworks entail insignificant accountability mechanisms should things go awry.

To address these issues, several recommendations have been proposed by experts.[14] First, enhancing regulatory transparency by establishing a centralized data governance repository would help businesses and policymakers navigate the regional landscape more effectively. Second, codifying minimum standards aligned with international norms, such as those of the OECD,[15] and the ASEAN Framework on Personal Data Protection,[16] could strengthen baseline protections and introduce proportionate limits on government access to data. Third, fostering interoperability and eliminating redundancies through mutual recognition of model contractual clauses (MCCs) and adequacy decisions would streamline compliance and reduce regulatory friction.

Looking ahead, the ASEAN Digital Economy Framework Agreement (DEFA) presents an opportunity to institutionalize these reforms. Experts[17] recommend that DEFA include measures to establish a continuously updated ASEAN data regulation hub, define baseline data protection standards aligned with international best practices, incorporate digital trade disciplines similar to those in the CPTPP, and accelerate the implementation of MCCs and other interoperable mechanisms to support regional data integration. These steps will be

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[14] Ibid.

[15] OECD, "Personal data protection", https://www.oecd.org/en/about/data-protection.html

[16] ASEAN, "Framework on Personal Data Protection," *ASEAN Telecommunications and Information Technology Ministers Meeting*, November 25, 2016, https://asean.org/wp-content/uploads/2012/05/10-ASEAN-Framework-on-PDP.pdf.

[17] Shota Watanabe, Ema Ogura, and Keita Oikawa, "Current Status of ASEAN Data Governance and Its Implications for the Digital Economy Framework Agreement," ERIA Discussion Paper Series, January 2025, https://www.eria.org/uploads/Current-Status-of-ASEAN-Data-Governance-and-Its-Implications-for-the-DEFA.pdf

critical in transforming ASEAN's current soft law approach into a more cohesive and robust data governance regime that can sustain digital growth and cross-border innovation.

Data Protection vis-à-vis AI Governance: The ASEAN Way

In terms of AI governance, soft laws are also favored by ASEAN in lieu of sweeping and rigid regulations. This approach leans on voluntary guidelines, ethical principles, and strategies, instead of a one-size-fits-all mandate in the entire region. A gradual regulatory alignment across member states ensures that the variations in political, legal, economic, and technological sectors are taken into consideration. Ultimately, it is a system that allows ASEAN nations to grow in innovation, but it currently lacks binding measures to ensure the protection of human rights, including areas such as data privacy and protection.

This philosophy aligns with the region's goal of becoming a digital society by this year. While there have been setbacks to this aim, such the ADM 2025[18] not once mentioning AI in its publication in 2021, the region has since moved to fill that gap. In February 2024, ASEAN introduced its Guide on AI Governance and Ethics,[19] outlining key principles such as transparency, fairness, accountability, and data privacy. As a non-binding document, the Guide is designed to be adaptable, enabling member states to shape AI governance in line with their specific needs, capacities, and policy environments. This is enacted to ensure that regulation facilitates, rather than hinders, technological progress in the region.

While there are no uniform, top-down AI regulations that encompass governance of data use, individual ASEAN countries have developed their own personal data protection laws, each tailored to their national contexts. These frameworks reflect each country's political systems, economic development, and technological maturity, underscoring ASEAN's commitment to regulatory flexibility in the pursuit of innovation-friendly digital transformation.

That said, if ASEAN truly aims to keep emerging technologies safe and centered on human values, it must begin exploring the adoption of stronger legal frameworks, AI regulation included, in a responsible and deliberate manner. This need has become increasingly urgent, given that such technologies are already being applied in ethically questionable ways (such

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[18] The Association of Southeast Asian Nations, "ASEAN Digital Masterplan 2025," *ASEAN Main Portal*, September 2021, https://asean.org/wp-content/uploads/2021/09/ASEAN-Digital-Masterplan-EDITED.pdf
[19] Association of Southeast Asian Nations (ASEAN), "ASEAN Guide on AI Governance and Ethics," *ASEAN Main Portal* (Association of Southeast Asian Nations, 2024), https://asean.org/wp-content/uploads/2024/02/ASEAN-Guide-on-AI-Governance-and-Ethics_beautified_201223_v2.pdf

as deepfake use during elections),[20] within the region. However, despite its role as Southeast Asia's regional organization, ASEAN functions as an intergovernmental body where each member state maintains full sovereignty. Unlike the European Union, it lacks a centralized legislative body, which complicates efforts to establish region-wide binding regulations.

Malaysia

Malaysia's approach to AI regulation, in true ASEAN fashion, is grounded in soft law tools such as national strategies and voluntary guidelines, supported by legal reforms in cybersecurity. This layered model allows for responsible innovation while addressing ethical, privacy, and security concerns.

The country is developing a comprehensive regulatory framework for AI that integrates ethical principles, legal safeguards, and infrastructure development. Central to this vision is a commitment to data security and trust in AI systems. Primarily, Malaysia's data protection framework is governed by the Personal Data Protection Act 2010 (PDPA), which regulates the storage or processing of personal data of individuals, public and private sectors for commercial transactions.[21] Meanwhile, its 2024 Cybersecurity Bill,[22] addresses critical concerns around data protection and security, aiming to reinforce the safe deployment of AI technologies in both public and private sectors.

Complementing this, the country has also established the National AI Roadmap (2021–2025),[23] which serves as a strategic foundation for AI governance and innovation. It follows a four-pronged approach, engaging public, private, academic, and civil society stakeholders. The Roadmap promotes responsible AI development guided by principles such as fairness, accountability, privacy, transparency, and inclusivity. It also emphasizes the creation of an AI-driven innovation ecosystem that benefits society while ensuring ethical and trustworthy AI adoption. The Roadmap targets five key sectors, namely, agriculture, healthcare, smart cities, education, and public services, and encourages active collaboration among government, industry, academia, and civil society.

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[20] Karryl Kim Sagun Trajano and Adhi Priamarizki, "Southeast Asia Faces AI Influence on Elections," The Strategist (ASPI Australian Strategic Policy Institute, March 4, 2025), https://www.aspistrategist.org.au/southeast-asia-faces-ai-influence-on-elections/
[21] https://www.malaysia.gov.my/portal/content/654
[22] Malaysia Federal Legislation, "Malaysia Act 854 Cybersecurity Act 2024," Federal Legislation, June 26, 2024, https://lom.agc.gov.my/act-detail.php?language=BI&act=854
[23] Kementerian Sains, Teknologi Dan Inovasi, "Malaysia National Artificial Intelligence Roadmap 2021-2025," Portal Rasmi Kementerian Sains, Teknologi Dan Inovasi, December 2023, https://hkifoa.com/wp-content/uploads/2024/12/ai-roadmap-2025-malaysia.pdf

In support of the Roadmap, the National Guidelines on AI Governance and Ethics,[24] was launched to help increase public trust and mitigate AI-related risks. These Guidelines outline seven core principles: fairness, transparency, safety, reliability, accountability, human-centricity, and promotion of human benefit. They serve as a voluntary reference for organizations and developers to align with ethical norms while innovating with AI.

To further consolidate governance efforts, Malaysia inaugurated its National Artificial Intelligence Office (NAIO) in December 2024.[25] This national-level body is tasked with coordinating AI policy, fostering cross-sector collaboration, and ensuring alignment with international standards and best practices.

Recognising the fast-evolving nature of AI, the government is also exploring new regulatory measures to address emerging challenges and ensure long-term sustainability and safety in AI deployment.[26]

However, the Malaysian approach is not without criticism. Interestingly, its PDPA exempts government agencies, covering mostly only the private sector.[27] The country's AI governance frameworks, being nonbinding, leaves a lot of room for improvement on its enforceability. [28] While there is public consultation, opportunities to challenge existing laws (or lack thereof) are not well developed.

Philippines

The Philippines combines existing legal instruments, international ethical standards, and national strategy to guide AI development responsibly. Its approach emphasizes data protection, transparency, and capacity building by creating a regulatory environment that balances innovation with public trust and accountability.

Central to its governance efforts is the Data Privacy Act (DPA) of 2012,[29] which plays a foundational role in overseeing the use of personal data in AI systems. Under this law,

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[24] Ministry of Science, Technology and Innovation, The National Guidelines on AI Governance & Ethics, https://premierdept.sarawak.gov.my/web/attachment/show/?docid=WGlKM05PRHRWTDB5MGk1akc0WUI2Zz09OjpinnzEB5f42U_84gafENAo
[25] Ministry of Digital, "MALAYSIA LAUNCHES NATIONAL AI OFFICE (NAIO)," *MyDIGITAL*, December 12, 2024, https://www.mydigital.gov.my/malaysia-launches-national-ai-office-naio/
[26] Zarrah Morden, "Putrajaya Working towards Framework to Regulate AI," Yahoo News, June 7, 2023, https://malaysia.news.yahoo.com/putrajaya-working-towards-framework-regulate-154146967.html
[27] Farlina Said and Farah Nabila, "Future of Malaysia's AI governance," November 2024, https://www.isis.org.my/wp-content/uploads/2024/12/AI-Governance.pdf
[28] Farlina Said and Farah Nabila, "Future of Malaysia's AI governance," November 2024, https://www.isis.org.my/wp-content/uploads/2024/12/AI-Governance.pdf
[29] Republic of the Philippines, "The Data Privacy Act and Its IRR," National Privacy Commission, 2022, https://privacy.gov.ph/the-data-privacy-act-and-its-irr/

organizations must first obtain informed consent for automated data processing and register such activities with the National Privacy Commission (NPC).[30] In 2024, the NPC issued Advisory No. 2024-04,[31] offering specific guidance on how the DPA applies to AI, ensuring clarity in the responsible and lawful use of personal data in emerging technologies.

Beyond national legislation, the Philippines draws on global ethical benchmarks,[32] including UNESCO's Recommendation on the Ethics of Artificial Intelligence 2021,[33] and the Bletchley Declaration 2023,[34] to shape principles of fairness, transparency, and accountability in AI governance. That said, meaningful participation can still be improved, especially since public participatory initiatives are more of consultations with little to no decision-making power.[35]

The country's strategic direction is defined by the 2021 AI Roadmap,[36] which outlines initiatives to strengthen digital infrastructure, foster research and development, and upskill the workforce. This Roadmap, covering the period up to 2024, aims to position the Philippines as a regional leader in AI within Southeast Asia.[37]

A couple other legislation further support AI preparedness in the country, particularly in workforce development and digital transformation. These include Republic Act No. 11927,[38] and Republic Act No. 11899,[39] both designed to equip workers with the digital skills necessary to thrive amid the challenges of the Fourth Industrial Revolution.[40]

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[30] National Privacy Commission, "Powers & Functions," National Privacy Commission (Republic of the Philippines, 2012), https://privacy.gov.ph/powers-functions/

[31] National Privacy Commission, Advisory No. 2024-04: Guidelines on the Use of Artificial Intelligence, December 19, 2024, https://privacy.gov.ph/wp-content/uploads/2025/02/Advisory-2024.12.19-Guidelines-on-Artificial-Intelligence-w-SGD.pdf

[32] Mark Robert Dy, "AI and the Law in the Philippines," *Law.asia*, April 15, 2024, https://law.asia/ai-law-philippines/

[33] UNESCO, *Recommendation on the Ethics of Artificial Intelligence* (2021), https://unesdoc.unesco.org/ark:/48223/pf0000380455.

[34] "The Bletchley Declaration by Countries Attending the AI Safety Summit, 1-2 November 2023," GOV.UK, November 1, 2023, https://www.gov.uk/government/publications/ai-safety-summit-2023-the-bletchley-declaration/the-bletchley-declaration-by-countries-attending-the-ai-safety-summit-1-2-november-2023

[35] Chua, L. et al., "Public Call on Ethics, Safety, and Governance of AI in the Philippines", *SSRN*, May 12, 2023, https://dx.doi.org/10.2139/ssrn.4461284

[36] Philippines Department of Science and Technology, "Artificial Intelligence and Information Communications Technology", August 2020. https://pcieerd.dost.gov.ph/images/pdf/2021/roadmaps/sectoral_roadmaps_division/etdd/Draft-1_AI--ICT-Roadmap-as-24.3.2021.pdf

[37] "AI and the Law in the Philippines," *Law.asia*, April 15, 2024, https://law.asia/ai-law-philippines/

[38] Republic of the Philippines, *Republic Act No. 11927: An Act to Enhance the Digital Workforce Competitiveness* (2022), https://jocellebatapasigue.com/2022/08/03/ra-11927-digital-workforce-competitiveness-law/

[39] Republic of the Philippines. *Republic Act No. 11899: An Act Creating a Second Congressional Commission on Education.* 2022. https://www.digest.ph/laws/second-congressional-commission-on-education-edcom-ii-act

[40] Elmer P. Dadios et al., Preparing the Philippines for the Fourth Industrial Revolution: A Scoping Study, PIDS Discussion Paper Series No. 2018-11 (Quezon City: Philippine Institute for Development Studies, August 2018). https://pidswebs.pids.gov.ph/CDN/PUBLICATIONS/pidsdps1811.pdf

Moreover, the Commission on Elections has introduced Resolution No. 11064,[41] which mandates transparency in the use of AI during electoral processes to prevent the spread of disinformation and protect democratic integrity.

Regionally, the Philippines has expressed support for the development of an ASEAN-wide regulatory framework on AI,[42] reinforcing its commitment to a collaborative, principle-based governance of emerging technologies.

Indonesia

Indonesia is taking a phased and principle-based approach to AI regulation, building on existing legal frameworks while drafting comprehensive governance structures.[43] At the foundation of this regulatory landscape is the Personal Data Protection (PDP) Law,[44] which forms a critical baseline for the ethical development and deployment of AI systems. The PDP Law, likewise, governs data transfers to ensure adequate and binding Personal Data Protection. In particular, it requires data controllers to obtain the data subject's approval and to ensure that the receiving jurisdiction has a level of data protection equal to or higher than the PDP Law.[45]

The country's primary legal foundation for AI is the amended Electronic Information and Transactions (ITE) Law No. 11 of 2008, updated by Law No. 1 of 2024.[46] This legislation introduces the concept of AI as an "Electronic Agent," meaning that technology operators may be held liable for the actions of AI systems except in cases where user negligence can be clearly demonstrated.[47]

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[41] Commission on Elections (COMELEC), *Resolution No. 11044* (Manila: COMELEC, 2024), https://lawphil.net/administ/comelec/comres2024/comres2024.html
[42] "Asian Governments Aim for Interoperability in AI Governance Frameworks," *Moody's Regulatory News*, 2024, https://www.moodys.com/web/en/us/insights/regulatory-news/asian-governments-aim-for-interoperability-in-ai-governance-frameworks.html
[43] Azunta Gaviola, "Indonesia Implements New Regulatory Reforms to Drive Data Centre Leadership in SEA," UpTech Media, January 7, 2025, https://uptech-media.com/indonesia-implements-new-regulatory-reforms-to-drive-data-centre-leadership-in-sea/.
[44] Republic of Indonesia, Law No. 27 of 2022 concerning Personal Data Protection, October 17, 2022.
[45] https://resourcehub.bakermckenzie.com/en/resources/cloud-compliance-center/apac/indonesia/topics/overseas-hosting
[46] Global Compliance News et al., "Indonesia: Breaking down the Second Amendment to the EIT Law – New Provisions on Electronic Certificate Providers, Prohibited Contents and Mandatory Use of Indonesian Law," Global Compliance News (2024 HHP Law Firm, March 6, 2024), https://www.globalcompliancenews.com/2024/03/06/https-insightplus-bakermckenzie-com-bm-data-technology-indonesia-breaking-down-the-second-amendment-to-the-eit-law-new-provisions-on-electronic-certificate-providers-prohibited-contents-and-mandator/.
[47] SSEK Legal Consultants, "Regulation of Artificial Intelligence in Indonesia," February 29, 2024, https://ssek.com/blog/indonesia-law-update-regulation-of-artificial-intelligence/

In parallel, Government Regulation No. 71 of 2019[48] outlines key responsibilities for electronic system operators, including obligations around security, efficiency, and consumer protection – principles that also extend to AI governance. Ethical dimensions of AI use have been addressed through Circular Letter No. 9 of 2023,[49] from the Ministry of Communication and Informatics (MOCI), which emphasizes transparency, inclusivity, and a limitation on the use of AI in making irreversible or life-altering decisions.

The financial sector has also begun to adopt sector-specific AI ethics frameworks. The Financial Services Authority (OJK)[50] has emphasized the importance of ethical standards, particularly regarding fairness and security in the application of AI technologies within financial services and fintech.

Guiding the country's long-term vision is the National Artificial Intelligence Strategy (Stranas KA) 2020–2045,[51] which takes a broader and more forward-looking approach. It encompasses AI ethics, talent development, digital infrastructure, and multi-stakeholder collaboration.

Efforts are currently underway to formalize a Presidential Regulation on AI Governance,[52] which is expected to serve as a pillar for a nationwide AI regulatory framework. Although the timeline remains uncertain, the Regulation is anticipated to be followed by sectoral rules in domains such as healthcare and education.

Indonesia's approach is shaped by both domestic values and global best practices. Drawing from the European Union AI Act,[53] UNESCO's AI Readiness Assessment,[54] and the country's foundational Pancasila philosophy,[55] Indonesia seeks to embed fairness, accountability, and

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[48] SSEK LAW FIRM, "Regulation of Artificial Intelligence in Indonesia," SSEK Law Firm, February 29, 2024, https://ssek.com/blog/indonesia-law-update-regulation-of-artificial-intelligence/.
[49] Sakura Yuki and Michelle Virgiany, "Ethical Guidelines on Use of Artificial Intelligence (AI) in Indonesia," Herbert Smith Freehills Kramer (Herbert Smith Freehills Kramer LLP 2025, February 12, 2024), https://www.herbertsmithfreehills.com/notes/tmt/2024-02/ethical-guidelines-on-use-of-artificial-intelligence-ai-in-indonesia.
[50] Ibid.
[51] The 5th Artificial Intelligence Innovation Summit, "The 5th AI Innovation Summit 2025," AIIS, August 10, 2020, https://ai-innovation.id/strategi.
[52] Farhan A Tegar Nurfitra, "Indonesia Eyes Detailed National Regulation on Artificial Intelligence," ed. Rahmad Nasution, ANTARA Indonesian News Agency, January 7, 2025, https://en.antaranews.com/news/340450/indonesia-eyes-detailed-national-regulation-on-artificial-intelligence.
[53] European Union, "Regulation - EU - 2024/1689 - EN - EUR-Lex," EUR-Lex Access to European Union Law (Publications Office of the European Union, July 12, 2024), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32024R1689
[54] UNESCO, "Readiness Assessment Methodology: A Tool of the Recommendation on the Ethics of Artificial Intelligence," UNESCO (unesco, August 28, 2023), https://unesdoc.unesco.org/ark:/48223/pf0000385198
[55] The 5th Artificial Intelligence Innovation Summit, "The 5th AI Innovation Summit 2025," AIIS, August 10, 2020, https://ai-innovation.id/strategi.

security[56] into its AI governance, while promoting responsible innovation and cross-sector collaboration.

That said, while Indonesia's governance frameworks reference Pancasila, there is protection of communities can still be bolstered. Legal and ethical requirements urge respect for human rights, mandates against discrimination, ensures transparency and enables public participation, but, operational safeguards, legal accountability and checks against overreach of those in power, and remedy for affected people and communities are still lacking. Regulations on data privacy have weak enforcement, thus not guaranteeing community protection.[57]

Thailand

Thailand's AI governance strategy integrates data privacy, risk-based regulation, and ethical standards to support innovation and national development. A key element is its own Personal Data Protection Act (PDPA),[58] which informs AI-related policies, including requirements for risk assessments, transparency, and compliance in AI systems,[59] particularly those using generative AI.

The National AI Strategy (2022–2027),[60] outlines a roadmap for transforming Thailand into a regional AI hub through investments in infrastructure, legal development, and talent re-skilling. Additionally, a separate legislation is under review, specifically a Royal Decree on AI[61] that is developed to implement and operationalise the regulatory objectives set by the National AI strategy.

Thailand is also finalising a public sector AI governance framework by this year,[62] which promotes ethical AI use in healthcare, agriculture, and energy, while restricting high-risk applications. Meanwhile, international cooperation is another pillar. Thailand often consults

[56] Ibid.

[57] Rejekiningsih, T., & Hakimi, H. a. "Exploring the integration of ideological values with artificial intelligence technology: A legal awareness perspective," *Jurnal Civics: Media Kajian Kewarganegaraan,* 20(2), 236-247. https://doi.org/10.21831/jc.v20i2.64132

[58] The nation. "AI Compliance and Innovation: Navigating Personal Data Regulations in Thailand." *The Nation*, August 10, 2024. https://www.nationthailand.com/blogs/business/tech/40040467

[59] ETDA, "DE, Hand in Hand, ETDA Announces New Guideline! 'Guidelines for Applying Generative AI with Good Governance for Organizations,'" ETDA, accessed July 1, 2025, https://www.etda.or.th/th/pr-news/AI_Gov_Anual.aspx.

[60] AI Thailand - ai.in.th, "Thailand National AI Strategy and Action Plan (2022-2027)," July 26, 2022, https://www.ai.in.th/wp-content/uploads/2022/12/2022-NAIS-Presentation-eng.pdf

[61] Digital Policy Alert, "DPA," Digital Policy Alert, October 18, 2022, https://digitalpolicyalert.org/event/23250-published-draft-royal-decree-on-business-operations-that-use-artificial-intelligence-systems.

[62] nationthailand, "Thailand's AI Bill Prioritises Responsible Use and Rights Protection," *Null*, June 8, 2025, https://www.nationthailand.com/business/tech/40050970.

UNESCO on AI ethics and readiness assessments,[63] and has launched national programs to educate civil servants and promote responsible AI including high-stakes sectors such as medicine and healthcare.[64]

To encourage responsible and innovative adoption of AI within Thailand, the country provides multi-year corporate income tax exemptions and R&D incentives[65] to companies with Board of Investment (BOI) license.[66] These incentives are aligned with Thailand's PDPA while the specifics for AI-compliance and ethical AI compliance requirements are still under development. That said, future BOI-promoted AI projects must adhere to the newly updated compliance requirements once they have been implemented.

Vietnam

In recent years, Vietnam has made some strides in strengthening data protection. On July 1, 2023, the country enacted its first comprehensive data protection law, the Personal Data Protection Decree No. 13/2023/ND-CP. This landmark decree consolidates key provisions governing the collection, processing, confidentiality, storage, and other aspects of personal data management.[67] Vietnam also enacted its first Law on Data (Law No. 60/2024/QH15), which came into effect on July 1, 2025. This law recognizes "data ownership" as a property right under civil law, and includes critical requirements on data classification, risk management, government lawful access, cross-border data transfer, operation of data products and services, and products and services licensing.[68]

Meanwhile, in terms of fostering responsible and inclusive AI growth, Vietnam's approach emphasizes the strengthening of infrastructure and governance. The country envisions itself being among the leading countries both for the ASEAN and global region when it comes to

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[63] UNESCO, "Bangkok Sets the Pace for AI Ethics: Highlights from UNESCO's 3rd Global Forum on the Ethics of AI," UNESCO, June 26, 2025, https://www.unesco.org/en/articles/bangkok-sets-pace-ai-ethics-highlights-unescos-3rd-global-forum-ethics-ai.

[64] Urs Gasser and Constanze Albrecht, "Insights from Practice: Building an AI Governance Clinic in Thailand," UNESCO (unesco, August 5, 2024), https://www.unesco.org/en/articles/insights-practice-building-ai-governance-clinic-thailand.

[65] Thailand Board of Investment, "Thailand BOI Okays Steps to Accelerate Investment and Promote Digital Adoption," Thailand Board of Investment - Press Release Detail (Thailand Board of Investment), accessed July 1, 2025, https://www.boi.go.th/index.php?page=press_releases_detail&topic_id=127308&language=en.

[66] BE Laws, "Starting an Artificial Intelligence Business in Thailand in 2025," belaws (Belaws 2017-2025, January 15, 2025), https://belaws.com/thailand/artificial-intelligence-business/.

[67] https://www.allenandgledhill.com/vn/publication/articles/23650/personal-data-protection-decree-in-effect-from-1-july-2023#:~:text=2023:%20Allen%20&%20Gledhill-,Vietnam%20Personal%20Data%20Protection%20Decree%20in%20effect%20from%201%20July,Definition%20of%20personal%20data

[68] https://kpmg.com/vn/en/home/insights/2024/12/vietnam-enacts-its-first-ever-data-law.html

AI capability.[69] With that aim, it established the National Strategy on Research, Development, and Application of Artificial Intelligence,[70] which provides a detailed AI development and governance framework.

Its governance framework is further enhanced by the Ministry of Science and Technology's Decision No. 1290/QD-BKHCN, which established Vietnam's first formal principles for responsible AI development.[71] The nine unique core principles are (1) Cooperation and Innovation, (2) Transparency, (3) Controllability, (4) Safety, (5) Security, (6) Privacy, (7) Respect for human rights and dignity, (8) User support, and (9) Accountability.[72]

Vietnam has issued a comprehensive AI specific legislation under the Law on Digital Technology Industry.[73] The Digital Technology Law provides an overall legal framework around AI governance through emphasis on transparency, accountability, safety, and non-discrimination,[74] while the Personal Data Protection law aims to protect users' privacy of their data while facilitating AI, blockchain, and other emerging technologies.[75] Vietnam's Digital Technology Law is expected to come into effect on January 1, 2026.[76]

Even with its robust policy planning, it is not without its challenges. It was indicated by a report by the United Nations Development Programme (UNDP) and Institute for Policy Studies and Media Development (IPS) that 87% of Vietnam's public sector projects with AI integration remain dormant, while 70% of the organisations surveyed rated their AI initiatives as ineffective.[77] The AI Landscape Assessment 2025 report[78] suggested that these

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[69] Ministry of Science and Technology Department of High Technology, "The National Strategy For Artificial Intelligence Research, Development And Application Through 2030" (Vietnam Law & Legal, January 26, 2021), https://research.csiro.au/aus4innovation/wp-content/uploads/sites/578/2025/04/3.-National-strategy-for-Artificial-Intelligence-2030-ENG.pdf

[70] Ibid.

[71] Vietnam+ (VietnamPlus), "Vietnam Makes Efforts to Promote Responsible AI Development," *Vietnam+ (VietnamPlus)*, August 29, 2024, https://en.vietnamplus.vn/vietnam-makes-efforts-to-promote-responsible-ai-development-post295695.vnp.

[72] Ibid.

[73] Sudhanshu Singh, "Vietnam Passes First-Ever Law on Digital Technology Industry," Vietnam Briefing News (1992-2023 Dezan Shira & Associates All Rights Reserved, June 19, 2025), https://www.vietnam-briefing.com/news/vietnam-passes-first-ever-law-on-digital-technology-industry.html/.

[74] Phong Anh Hoang, "Vietnam: Landmark Law on Digital Technology Industry - New Frameworks for AI & Digital Assets," DFDL, June 23, 2025, https://www.dfdl.com/insights/legal-and-tax-updates/vietnam-landmark-law-on-digital-technology-industry-new-frameworks-for-ai-digital-assets/.

[75] KPMG, "Vietnam's New Personal Data Protection Law," *KPMG*, June 27, 2025, https://kpmg.com/vn/en/home/insights/2025/06/vietnam-new-personal-data-protection-law.html.

[76] Sudhanshu Singh, "Vietnam Passes First-Ever Law on Digital Technology Industry," Vietnam Briefing News (1992-2023 Dezan Shira & Associates All Rights Reserved, June 19, 2025), https://www.vietnam-briefing.com/news/vietnam-passes-first-ever-law-on-digital-technology-industry.html/.

[77] Vietnam+ (VietnamPlus), "Report Flags Gaps in Vietnam's AI Push in Public Sector," Vietnam+ (VietnamPlus), March 18, 2025, https://en.vietnamplus.vn/report-flags-gaps-in-vietnams-ai-push-in-public-sector-post311809.vnp

[78] UNDP, "Artificial Intelligence Landscape Assessment: Shaping AI to Be an Empowering Force for People and Planet" (UNDP, April 11, 2025), https://www.undp.org/sites/g/files/zskgke326/files/2025-04/undp_aila_eng_report_2025_final.pdf.

challenges may be attributed to the lack of funding, infrastructure development, and workforce availability.

Despite this, Vietnam remains committed in its pursuit of AI development. It intends to equip its youths with basic AI and data science application by 2030, allowing them the opportunity to further hone their skills so that they may fill the nation's much-needed roles of AI specialists and engineers for future scientific works and patent applications concerning AI.[79] Vietnam also plans to build more national data centres and computing infrastructure to support AI research, development, and application and reinforce its AI ecosystems to achieve its broader aim of becoming one of the leading ASEAN countries in AI.[80] All these efforts are under the framework of substantive government support through tax incentives,[81] and the establishment of international partnerships for its national digital transformation agenda.[82]

Brunei

Brunei has not yet enacted specific AI legislation, but it is advancing a strategic and ethical approach to AI governance. The Authority for Info-Communications Technology Industry (AITI) has introduced a Guide on AI Governance and Ethics,[83] outlining seven core principles, including transparency, fairness, accountability, and data protection. These principles are intended to guide responsible AI development across all sectors.

AI policy is integrated into the broader Digital Economy Masterplan 2025,[84] which focuses on digital infrastructure, talent development, and public-private collaboration. The Ministry of Transport and Info Communications (MTIC),[85] is also working on a Data strategy that would serve in addition to the larger national AI research initiative.

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[79] Ministry of Science and Technology Department of High Technology, "The National Strategy For Artificial Intelligence Research, Development And Application Through 2030" (Vietnam Law & Legal, January 26, 2021), https://research.csiro.au/aus4innovation/wp-content/uploads/sites/578/2025/04/3.-National-strategy-for-Artificial-Intelligence-2030-ENG.pdf.
[80] Ibid.
[81] Sudhanshu Singh, "Vietnam Passes First-Ever Law on Digital Technology Industry," Vietnam Briefing News (1992-2023 Dezan Shira & Associates All Rights Reserved, June 19, 2025), https://www.vietnam-briefing.com/news/vietnam-passes-first-ever-law-on-digital-technology-industry.html/.
[82] Samaya Dharmaraj, "Vietnam: Global Partnerships Power Digital Transformation – OpenGov Asia," OpenGov (2012-2025 OpenGov Asia, June 27, 2025), https://opengovasia.com/2025/06/27/vietnam-global-partnerships-power-digital-transformation/.
[83] Authority for Info-communications Technology Industry, "Artificial Intelligence (AI) Governance and Ethics for Brunei Darussalam," April 11, 2025, https://78460737.flowpaper.com/AITIGuideonAIGovernanceandEthicsforBruneiDarussalam/#page=16
[84] Digital Economy Council, Brunei Darussalam, "Digital Economy Masterplan 2025," June 4, 2020, https://www.mtic.gov.bn/DE2025/documents/Digital%20Economy%20Masterplan%202025.pdf.
[85] Rasidah Hj Abu Bakar and Ain Bandial, "'AI Will Be Central to next Digital Master Plan,'" The Scoop (2025 Scoop Media, June 24, 2025), https://thescoop.co/2025/06/24/ai-will-be-central-to-next-digital-master-plan/.

Although AI-specific laws are still in progress, Brunei is close to finalizing its Personal Data Protection Law,[86] which will regulate how personal data is collected, used, and disclosed – an essential step as AI adoption increases.

The country's national strategy emphasizes human oversight, risk management, and sectoral adaptability,[87] ensuring alignment with international best practices, including the ASEAN Guide on AI Governance and Ethics.[88]

Myanmar

Myanmar's approach relies on stakeholder engagement, innovation, and adaptable governance to ensure that AI contributes to national development and public service delivery in a secure and equitable manner. It currently lacks a formal legal framework specific to AI, but steps are underway to establish foundational policies. Since early 2025, high-level coordination meetings led by the Ministry of Science and Technology,[89] have been held to shape a National AI Strategy and Policy. This forthcoming strategy will promote the ethical and responsible use of AI across key sectors, with guiding principles aligned to the ASEAN Guide on AI Governance and Ethics, emphasizing fairness, accountability, privacy, and transparency.

While Myanmar's data protection framework similarly remains in its early stages, it reflects a growing commitment to stronger regulation, as evidenced in the 2021 amendments to the Electronic Transactions Law, which introduced a chapter dedicated to "Protection of Personal Data." These provisions mandate the secure storage, processing, and timely destruction of personal data based on its classification and retention period, while prohibiting any unauthorized access, disclosure, or use without the individual's consent or legal authority.[90] Likewise, although still in draft form, Myanmar's recent Cybersecurity Law No.

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[86] Asia Pacific Institute, "2023 Trustworthy Artificial Intelligence in the Asia-Pacific Region" (2023 AI Asia Pacific Institute, September 2023), https://aiasiapacific.org/wp-content/uploads/2023/09/Trustworthy-AI-Report-2023.pdf.

[87] Authority for Info-communications Technology Industry, "Draft Guide on Artificial Intelligence (AI) Governance and Ethics For Brunei Darussalam," July 9, 2024, https://www.aiti.gov.bn/media/eysd0thx/draft-guide-on-ai-governance-ethics-for-public-consultation_9july2024.pdf.

[88] ASEAN, "ASEAN Guide on AI Governance and Ethics," February 2024, https://asean.org/wp-content/uploads/2024/02/ASEAN-Guide-on-AI-Governance-and-Ethics_beautified_201223_v2.pdf.

[89] Ministry of Information, "Fourth Coordination Meeting Held on Drafting National AI Strategy ," Myanmar National Portal (2018 Government of Republic of the Union of Myanmar, February 19, 2025), https://myanmar.gov.mm/en/news-media/news/latest-news/-/asset_publisher/idasset354/content/national-ai-strategy-national-ai-policy-%25E1%2580%2599%25E1%2580%25B0%25E1%2580%2580%25E1%2580%25BC%25E1%2580%2599%25E1%2580%25BA%25E1%2580%25B8-%25E1%2580%259B%25E1%2580%25B1%25E1%2580%25B8%25E1%2580%2586%25E1%2580%25BD%25.

[90] https://www.myanmar-responsiblebusiness.org/pdf/electronic-transactions-law_consolidated_2014-and-2021_en.pdf

1/2025,[91] may likely serve as a soft regulatory mechanism. The law requires digital platforms with over 100,000 users to register with the government, offering potential oversight of AI-enabled services.

Myanmar's AI vision is embedded in its e-Governance Master Plan 2030,[92] which positions AI alongside other transformative technologies like cloud computing, IoT (Internet of Things), and big data to modernize public administration and drive inclusive digital transformation. The strategy emphasizes infrastructure investment, cybersecurity, and digital literacy, especially in underserved communities.

Cambodia

Cambodia's evolving AI governance model is grounded in ethical safeguards, regional cooperation, and international compliance, aiming to support innovation while upholding public trust and long-term national goals.

While a dedicated AI law is still under development,[93] the country's regulatory foundation emphasizes responsible innovation and aims to "regulate, not strangulate" AI use.[94] Data privacy and human oversight are central concerns,[95] especially as AI systems become more embedded in public services and digital governance.

Cambodia's participation in UNESCO's Ethics of AI Readiness Assessment (2024–2025),[96] involving over 26 national and private institutions, has aligned its approach with international ethical standards. Cambodia is now one of 60 countries (and one of seven ASEAN members) committed to implementing UNESCO's ethical AI recommendations.[97] The country also

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[91] Jun Yee Lee, Minn Naing Oo, and Hsiu-Hau Oh, "Myanmar's New Cybersecurity Law Establishes Framework and Processes for Use of Digital Resources," Allen & Gledhill (2025 Allen & Gledhill, March 20, 2025), https://www.allenandgledhill.com/mm/perspectives/articles/30196/mmkh-s-new-cybersecurity-law-establishes-framework-and-processes-for-use-of-digital-resources.

[92] The Government of the Republic of the Union of Myanmar, Ministry of Transport and Communications, "Myanmar E-Governance Master Plan 2030," Myanmar National Portal (Ministry of Transport and Communications, December 2024), https://myanmar.gov.mm/documents/20143/0/Myanmar+e-Governance+Master+Plan+2030+%28English+version%29.pdf/7565b686-90c8-68dc-4649-3e1c9ad3f37d?t=1742277608582.

[93] Rov Hongseng, "Officials Preparing to Regulate Use of AI in Cambodia," Kiripost, September 13, 2024, https://kiripost.com/stories/officials-preparing-to-regulate-use-of-ai-in-cambodia.

[94] Ibid.

[95] Ministry of Post and Telecommunications, "Cambodia Digital Government Policy 2022-2035," January 2022, https://asset.cambodia.gov.kh/mptc/media/Cambodia_Digital_Government_Policy_2022_2035_English.pdf.

[96] Cambodia Academy of Digital Technology and UNESCO, "Strategic Consultation on Validating Preliminary Results and Discussing Recommendations of the UNESCO's Ethics of AI Readiness Assessment in Cambodia," CADT (Cambodia Academy of Digital Technology, February 8, 2025), https://cadt.edu.kh/news/workshop-on-validating-preliminary-results-and-discussing-recommendations-of-the-unescos-ethics-of-ai-readiness-assessment-in-cambodia/.

[97] UNESCO, "Recommendation on the Ethics of Artificial Intelligence" (UNESCO 2022, November 23, 2021), https://unesdoc.unesco.org/ark:/48223/pf0000381137.

contributes to regional AI alignment through committing to the ASEAN Guide on AI Governance and Ethics,[98] and its generative AI extension.[99]

Cambodia's broader regulatory direction is shaped by the Digital Government Policy (2022–2035),[100] which provides a long-term roadmap for managing emerging technologies. Oversight efforts are coordinated by the Ministry of Posts and Telecommunications (MPTC),[101] and harmonized through active involvement in ASEAN bodies, including proactive dialogue engagements with other ASEAN nations' digital ministers,[102] and senior officials,[103] not forgetting the Working Group on AI Governance (WG-AI).[104] Likewise, in November 2022, MPTC announced that it has finished the first draft of the Personal Data Protection Law and plans to hold internal discussions for refinements.[105]

Laos

Laos may not have passed an AI-specific statute, but it has already operated a binding data-protection regime under the Law on Electronic Data Protection No.25/NA (2017),[106] that provides functionality for distinguishing data, granting data-subject rights, and empowering the Ministry of Technology and Communications (MTC) authority to impose fines up to LAK 15 million for non-compliance.[107] This regime operates in conjunction with the Cybercrime Law No. 61/NA,[108] and related penal-code provisions that criminalise unauthorized access,

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[98] Association of Southeast Asian Nations, "ASEAN Guide on AI Governance and Ethics," ASEAN Publication (2025 ASEAN Secretariat, February 2, 2024), https://asean.org/book/asean-guide-on-ai-governance-and-ethics/.
[99] Association of Southeast Asian Nations, "Expanded ASEAN Guide on AI Governance And Ethics - Generative AI," ASEAN Publication (2025 ASEAN Secretariat, January 17, 2025), https://asean.org/book/expanded-asean-guide-on-ai-governance-and-ethics-generative-ai/.
[100] Ministry of Post and Telecommunications, "Cambodia Digital Government Policy 2022-2035," January 2022, https://asset.cambodia.gov.kh/mptc/media/Cambodia_Digital_Government_Policy_2022_2035_English.pdf.
[101] Ibid.
[102] Charles Labrecque, "ASEAN Issues Guidelines for Artificial Intelligence," *Asia Pacific Foundation of Canada*, March 6, 2024, https://www.asiapacific.ca/publication/asean-issues-guidelines-artificial-intelligence.
[103] ASEAN, "ASEAN Digital Senior Officials Calls for Collaboration in Shaping ASEAN's Digital Future," ASEAN, June 13, 2025, https://asean.org/asean-digital-senior-officials-calls-for-collaboration-in-shaping-aseans-digital-future
[104] Kao Kim Hourn, "Remarks by H.E. Dr Kao Kim Hourn, Secretary-General of ASEAN " (AI Opportunity Southeast Asia Forum, October 2, 2024), https://asean.org/wp-content/uploads/2024/10/SG_Remarks-for-AI-Opportunity-Forum-South-East-Asia_-2-Oct.pdf.
[105] https://www.tilleke.com/wp-content/uploads/2024/07/Tilleke-Cybersecurity-and-Data-Protection-in-Mainland-Southeast-Asia-2024.pdf
[106] Geneva Internet Platform - digwatch, "Laos' Law on Electronic Data Protection No. 25/NA," Digital Watch Observatory (DiploFoundation, May 2017), https://dig.watch/resource/laos-law-on-electronic-data-protection-no-25-na
[107] CaseGuard AI Redaction & Privacy for All, "Data Protection in Laos, New Regulations for Privacy," CaseGuard (CaseGuard 2025, December 22, 2021), https://caseguard.com/articles/data-protection-in-laos-new-regulations-for-privacy/.
[108] Tilleke & Gibbins et al., "Laos," *Regional Guide to Cybersecurity and Data Protection In Mainland Southeast Asia* (2024 Tilleke & Gibbins, 2024), https://www.tilleke.com/wp-content/uploads/2024/07/Tilleke-Cybersecurity-and-Data-Protection-in-Mainland-Southeast-Asia-2024.pdf.

interception, or destruction of computer data, with penalties of up to LAK 50 million and depending on the severity of the offense, up to 5-years of imprisonment.[109]

Building on this statutory floor, the government is drafting an AI governance plan anchored in its National Digital Economic Development Strategy.[110] These instruments commit Laos in utilizing digital technology as a primary driver of sustainable economic growth,[111] and explicitly demands that ministries craft sectoral rules for emerging technologies, including AI, in harmony with the ASEAN Digital Masterplan 2025,[112] and the adopted cross-border data flows mechanism.[113]

The regulatory development follows the "soft but values-oriented" ASEAN playbook whereby the MTC and the Ministry of Justice conducts mandatory impact assessments on all draft legislations,[114] which would also cover AI-related legislations. Laos is also in the process of implementing UNESCO's AI-Ethics Readiness Assessment Methodology,[115] it likewise also references ISO/IEC 42001,[116] in its AI training workshops, for future AI management system certification. ASEAN-focused AI governance workshops,[117] are likewise shaping guidelines on transparency, accountability, and privacy-by-design, mirroring the Expanded ASEAN Guide on AI Governance and Ethics 2025.[118]

[109] Ibid.

[110] Ministry of Technology and Communications, "10-Year National Digital Economy Development Strategy (2021-2030) and 5-Year National Digital Economy Development Plan (2021-2025), Work Plans and Project/Activities.," *National Digital Economy Development Strategy (2021-2030)*, December 2021, https://mtc.gov.la/index.php?r=site/downloadfile&file=Wi_AjMvVbw1a5dfyK2hewd/d8041fafe380173c81841cdce0be35b4.pdf.

[111] Ibid.

[112] The Association of Southeast Asian Nations, "ASEAN Digital Masterplan 2025," ASEAN Main Portal, September 2021, https://asean.org/wp-content/uploads/2021/09/ASEAN-Digital-Masterplan-EDITED.pdf.

[113] ASEAN, "Implementing Guidelines for ASEAN Data Management Framework And ASEAN Cross Border Data Flows Mechanism," Final Copy Approved by the 1st ASEAN Digital Ministers' Meeting (ADGMIN), January 2021, https://asean.org/wp-content/uploads/2021/08/Implementing-Guidelines-for-ASEAN-Data-Management-Framework-and-Cross-Border-Data-Flows.pdf.

[114] Ministry of Justice, "General Provisions," Decision on the Impact Assessment of Draft Legislation (Ministry of Justice, July 12, 2012), https://laoofficialgazette.gov.la/kcfinder/upload/files/Minister%20Decision%20on%20the%20Impact%20Assessment%20of%20Draft%20Legislation-English.pdf

[115] UNESCO, "Readiness Assessment Methodology: A Tool of the Recommendation on the Ethics of Artificial Intelligence," UNESCO (UNESCO, August 28, 2023), https://unesdoc.unesco.org/ark:/48223/pf0000385198

[116] Laos News Agency, "Responsible AI Workshop Equips Lao Officials and Private Sector with Governance Tools," Laos News Agency (2014 Laos News Agency, June 17, 2025), https://kpl.gov.la/En/detail.aspx/detail.aspx?id=91999.

[117] Phetphoxay Sengpaseuth, "AI Seen to Advance Digital Governance, Industry, Ethics in Laos - Asia News Network," Asia News NetworkAsia News Network (2018-2024 Asia News Network, March 19, 2025), https://asianews.network/ai-seen-to-advance-digital-governance-industry-ethics-in-laos/.

[118] Association of Southeast Asian Nations, "Expanded ASEAN Guide on AI Governance and Ethics - Generative AI," ASEAN Publication (2025 ASEAN Secretariat, January 17, 2025), https://asean.org/book/expanded-asean-guide-on-ai-governance-and-ethics-generative-ai/.

Concrete projects underscore this principles-first approach. Laos has launched 37 digital-government systems,[119] and is rolling out a national digital-ID platform with Japan's support to embed privacy controls in its institutions.[120] International cooperation is deepening through the China-Laos AI Innovation Cooperation Center signed in 2025,[121] and a feasibility study for a 150-hectare AI special economic zone,[122] in Vientiane powered by green energy, both conceived as testbeds for responsible AI and secure data localisation.

Taken together, Laos' strategy blends hard law on data protection with soft-law, ethics led AI governance, regional interoperability, and green digital infrastructure-encapsulating the wider ASEAN tendency to pursue soft but ethical regulatory paths that prioritize consensus, capacity-building, and cross-border trust over sweeping mandatory controls.

Singapore

Singapore's use of AI regulations and privacy is governed by its Personal Data Protection Act (PDPA),[123] which outlines how organizations collect, store, manage and use personal data and information. To address the growing convergence of AI technology and data protection, the Personal Data Protection Commission (PDPC) published an Advisory Guideline on the Use of Personal Data in AI Recommendation and Decision Systems on March 1, 2024.[124]

During the development phase of AI systems, organizations must ensure that the use of personal data complies with consent and notification obligations under the PDPA. This means they must either obtain consent from individuals or rely on statutory exceptions. Two key exceptions include the Business Improvement Exception, which permits intra-group data use to enhance products or improve operational efficiency, and the Research Exception, which allows cross-company data sharing for commercial research beneficial to the public, provided the data is anonymized and non-identifiable. But while anonymization is strongly

[119] Chris Burt, "Laos Targets Digital Transformation with DPI Development, Open-Source Tech," BiometricUpdate.Com, February 25, 2025, https://www.biometricupdate.com/202502/laos-targets-digital-transformation-with-dpi-development-open-source-tech.

[120] Ayang Macdonald, "Japan Supporting Identity System Upgrades in Vietnam, Laos," BiometricUpdate.Com, November 20, 2024, https://www.biometricupdate.com/202411/japan-supporting-identity-system-upgrades-in-vietnam-laos.

[121] Advertorial Desk, "Guangxi Joins Hands with ASEAN to Step into the AI Era," Laotian Times, February 24, 2025, https://laotiantimes.com/2025/02/24/guangxi-joins-hands-with-asean-to-step-into-the-ai-era/.

[122] The Star Online, "Laos to Develop AI Infrastructure with Green Energy," The Star, June 3, 2025, https://www.thestar.com.my/aseanplus/aseanplus-news/2025/06/03/laos-to-develop-ai-infrastructure-with-green-energy.

[123] Personal Data Protection Commission, "PDPC Overview," PDPA Overview (2025 Personal Data Protection Commission, 2012), https://www.pdpc.gov.sg/overview-of-pdpa/the-legislation/personal-data-protection-act.

[124] Personal Data Protection Commission. *Advisory Guidelines on the Use of Personal Data in AI Recommendation and Decision Systems*. Issued March 1, 2024. Accessed July 9, 2025. https://www.pdpc.gov.sg/-/media/files/pdpc/pdf-files/advisory-guidelines/advisory-guidelines-on-the-use-of-personal-data-in-ai-recommendation-and-decision-systems.pdf

encouraged, trade-offs such as potential impacts on model accuracy must be carefully documented and managed within a proper governance framework.

In the deployment phase, organizations must uphold transparency and accountability. This includes fulfilling consent and notification obligations by informing individuals about the purpose of data collection, the types of data being processed, how the data relates to product features, and which data attributes significantly influence outcomes. Where appropriate, organizations may apply the Legitimate Interests Exception (such as in fraud detection) provided that the use is proportionate and accompanied by adequate safeguards. Additionally, organizations must uphold accountability by documenting measures that ensure fairness and mitigate bias, disclosing their governance practices, and leveraging tools like AI Verify,[125] and the Model AI Governance Framework,[126] to assess and validate the integrity of their AI systems.

As for the procurement phase, third-party AI developers (such as systems integrators) are treated as data intermediaries under the PDPA. They must comply with protection and retention obligations and are expected to adopt good practices, including data mapping and labelling, provenance tracking of training datasets, and designing AI systems in ways that support clients' PDPA compliance.

To advocate the practice of ethical innovation, the Info-Communications Media Development Authority (IMDA) broadened its Privacy Enhancing Technologies (PET) Sandbox,[127] to embrace generative AI applications. Also, the PET Sandbox, which had launched in July of 2022, added a fourth archetype called "Data Use for Gen AI" in 2024,[128] which empowers organisations with the opportunity to experiment with privacy preserving methods in pursuit of AI advancement.

Singapore's approach to AI Governance can be described as a combination of mostly non-binding guidance and practice toolkits to encourage responsible innovation, its non-binding guidance being the Model AI Governance Framework. It was first published on January 23,

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[125] Info-communications Media Development Authority. AI Verify: AI Governance Testing Framework & Toolkit. May 2022. Accessed July 9, 2025. https://file.go.gov.sg/aiverify.pdf

[126] Info-communications Media Development Authority. Model AI Governance Framework Second Edition. January 2020. http://go.gov.sg/AI-gov-MF-2

[127] Info-communications Media Development Authority. "Privacy Enhancing Technology Sandboxes." Accessed July 9, 2025. https://www.imda.gov.sg/how-we-can-help/data-innovation/privacy-enhancing-technology-sandboxes=

[128] Ibid.

2019, and amended on January 21, 2020,[129] with the intended goal of providing private-sector organisations with a benchmark resource to assist and support their efforts in promoting transparency, explainability, fairness, human-centred design, robust internal governance, proactive risk management and stakeholder engagement.

For practical implementation of these principles, Singapore launched the AI Verify ToolKit on May 25, 2022.[130] This toolkit enables organisations to evaluate their AI systems based on tested benchmarks for fairness, transparency, and accountability.[131] The toolkit aims to build public trust by providing information on how the AI systems are designed and operated.

In recognition of the rise of generative AI, Singapore issued the Model AI Governance Framework for Generative AI,[132] on May 30, 2024. The framework consists of nine dimensions: accountability, data governance, trusted development and deployment, incident reporting, testing and assurance, security, document provenance, and safety research, to create a trusted ecosystem for generative AI.[133]

Under this Framework[134], organisations must ensure the lawful and purposeful use of data, meaning personal data should be accessed only with a legal basis and used for clearly defined purposes, all of which must be properly documented. Second, data minimization and retention principles should guide the design of AI systems, data collected must be strictly necessary for the system's function, and personal data should not be retained indefinitely. Third, strong security and access controls are essential. These include technical and organisational measures such as access restrictions, encryption, and audit trails, all aimed at reducing the risk of data breaches or unauthorized access.

The Framework[135] also addresses AI-specific privacy considerations. It promotes anonymization and de-identification of data where feasible. Organisations must also assess trade-offs between privacy and model performance. Transparency in data use is vital, and organisations should inform stakeholders about what data is used, how it influences AI decisions, and whether sensitive attributes (such as race or health information) are involved.

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[129] Info-communications Media Development Authority. Model AI Governance Framework Second Edition. January 2020. Accessed July 9, 2025. https://www.pdpc.gov.sg/-/media/Files/PDPC/PDF-Files/Resource-for-Organisation/AI/SGModelAIGovFramework2.pdf
[130] Info-communications Media Development Authority. AI Verify: AI Governance Testing Framework & Toolkit. May 2022. Accessed July 9, 2025. https://file.go.gov.sg/aiverify.pdf
[131] Ibid.
[132] Info-communications Media Development Authority. Model AI Governance Framework for Generative AI. May 2024. https://aiverifyfoundation.sg/wp-content/uploads/2024/05/Model-AI-Governance-Framework-for-Generative-AI-May-2024-1-1.pdf
[133] Ibid.
[134] Ibid.
[135] Ibid.

Additionally, human oversight is required for decisions involving personal data, especially in cases where outcomes are significant or irreversible. This involves implementing either human-in-the-loop or human-over-the-loop mechanisms.

Risk-based governance is likewise promoted by the Framework[136]. High-impact AI use cases, such as credit scoring or recruitment, demand heightened scrutiny. To manage these risks, organizations are encouraged to conduct Data Protection Impact Assessments and perform algorithm audits to evaluate and mitigate privacy risks effectively.

Singapore currently does not have any overarching, binding legislation related to AI, however, sector regulators had developed domain-specific guidelines. On December 5, 2024, the Monetary Authority of Singapore (MAS) released an Information Paper on AI model Risk management,[137] outlining good practices of AI and generative AI model risk management in the financial sector, with an overarching emphasis on the supervision of AI, including key risk management of systems and processes, and development and deployment of AI.[138] Earlier in 2018, MAS established the FEAT principles – Fairness, Ethics, Accountability, and Transparency,[139] or the responsible use of AI in finance.

A year later, the government announced its nation-wide strategy, known as the National AI strategy (NAIS), this was followed by an updated version 2.0 (NAIS 2.0),[140] which was officially released on December 4, 2023. The NAIS 2.0 expresses a vision of pursuing AI development with the principle of "AI for the Public Good, for Singapore and the World",[141] highlighting its ambition for excellence and empowerment. Part of its commitment include Singapore's aim to incorporate three key principles of trust, growth and community,[142] while advancing its digital transformation pursuits.

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[136] Ibid.
[137] Monetary Authority of Singapore. Artificial Intelligence Model Risk Management. December 2024. https://www.mas.gov.sg/-/media/mas-media-library/publications/monographs-or-information-paper/imd/2024/information-paper-on-ai-risk-management-final.pdf
[138] Ibid.
[139] Ibid.
[140] Smart Nation Singapore, "National Artificial Intelligence Strategy 2 to Uplift Singapore's Social and Economic Potential," Smart Nation and Digital Government Office, December 4, 2023, https://www.sgpc.gov.sg/api/file/getfile/Press%20Release_NAIS%202_0%20and%20SCAI_4%20Dec.pdf?path=/sgpcmedia/media_releases/sndgo/press_release/P-20231204-2/attachment/Press%20Release_NAIS%202_0%20and%20SCAI_4%20Dec.pdf
[141] Ibid.
[142] Smart Nation Singapore, "Goals of SN2," Smart Nation Singapore Media Hub (2025 Smart Nation and Digital Government Office, October 1, 2024), https://www.sgpc.gov.sg/api/file/getfile/2%20Summary%20of%20Announcements%20under%20Smart%20Nation%202_FINAL.pdf?path=/sgpcmedia/media_releases/mddi-ced/press_release/P-20241001-1/attachment/2%20Summary%20of%20Announcements%20under%20Smart%20Nation%202_FINAL.pdf

Strategic Implications for Singapore

Singapore's AI guidelines embody a risk-based, innovation-friendly approach to data governance, which brings both advantages and challenges. On one hand, regulatory flexibility supports innovation by reducing compliance burdens, particularly for small and medium enterprises (SMEs) and startups in high-growth sectors such as fintech and healthtech. On the other hand, this flexibility may come at the cost of legal certainty, as the lack of enforceable obligations can result in inconsistent adoption of ethical AI practices across industries and create uncertainty for companies operating across borders.

In terms of market signalling and global positioning, Singapore's "light-touch" regulatory approach communicates a pro-business environment that attracts AI investment and talent. Yet, companies expanding into jurisdictions with more stringent rules, like those under the EU AI Act, may face increased complexity as they retrofit their systems to comply with stricter standards.

From a risk management and public trust perspective, voluntary tools such as AI Verify,[143] enhance transparency and accountability, but the absence of statutory enforcement may leave high-risk applications, such as facial recognition and autonomous systems, insufficiently regulated. This could undermine public trust, particularly if voluntary compliance fails to prevent harm in sensitive areas like healthcare or employment.

Singapore's wait-and-see regulatory stance reflects a cautious approach aligned with the Collingridge Dilemma,[144] where early regulation may stifle innovation, yet delayed intervention risks cementing harmful practices, making future regulation more difficult and costly. Additionally, while Singapore's soft-law model has helped shape regional initiatives like the ASEAN Guide on AI Governance and Ethics,[145] the lack of binding standards may limit interoperability with jurisdictions that enforce more rigorous AI governance regimes.

Policy considerations moving forward include adopting hybrid regulatory models for high-risk AI applications that combine voluntary frameworks with targeted statutory requirements. Sectoral differentiation could help by introducing binding safeguards in areas with significant societal impact, such as law enforcement and financial services. Lastly, to ensure global

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[143] Info-communications Media Development Authority. AI Verify: AI Governance Testing Framework & Toolkit. May 2022. Accessed July 9, 2025. https://file.go.gov.sg/aiverify.pdf

[144] Angeliki Vourdakis, "What Is the Collingridge Dilemma and Why Is It Important for Tech Policy?," Demos Helsinki, November 21, 2023, https://demoshelsinki.fi/what-is-the-collingridge-dilemma-tech-policy/

[145] "Expanded ASEAN Guide on AI Governance and Ethics - Generative AI." ASEAN Publication. 2025 ASEAN Secretariat, January 17, 2025. https://asean.org/book/expanded-asean-guide-on-ai-governance-and-ethics-generative-ai

readiness, local firms should be equipped with scalable compliance strategies to navigate increasingly diverse international regulatory landscapes.

Turning Feedback into Progress?

That said, Singapore has demonstrated not only capabilities in technological innovation but also an ability to adapt its approaches in response to evolving technologies and stakeholder feedback. Singapore's approach to AI governance is generally regarded as forward-thinking, emphasizing voluntary guidelines and a flexible "quasi-regulation" model that encourages industry collaboration. However, this reliance on non-binding frameworks has attracted criticism,[146] as observers worry that without enforceable, AI-specific laws, the country may lack sufficient safeguards against the growing complexities and risks of AI, particularly with the rise of generative AI, disinformation, and privacy breaches. It is therefore argued that a stronger, legally binding governance structure could better ensure accountability and bolster public trust.[147]

Its PDPA,[148] was first enacted in 2012 and is regularly updated to align with global standards like the EU's GDPR.[149] Recent amendments have introduced mandatory data breach notifications within three days, stronger consent requirements including data portability, higher penalties (up to 10% of annual turnover or S$1 million) and mandatory registration of Data Protection Officers to increase accountability.[150] These enhancements reflect Singapore's ambition to maintain its reputation as a trusted digital hub while protecting consumer rights.

Despite the PDPA's robustness for the private sector, a major point of contention is its exemption of government agencies from the law's provisions.[151] This gap has increased concerns over unchecked state use of personal data, especially given Singapore's extensive surveillance infrastructure. The city-state is known for monitoring through thousands of police cameras, widespread facial recognition technology, and during the COVID-19

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[146] Jason Grant Allen, Jane Loo, and Jose Luis Luna Campoverde, "Governing Intelligence: Singapore's Evolving AI Governance Framework," *Cambridge Forum on AI: Law and Governance (2025)* 1 (November 8, 2024): 1–20, https://doi.org/10.1017/cfl.2024.12.
[147] Ibid.
[148] Singapore Statutes Online, "Personal Data Protection Act 2012," Singapore Statutes Online (2025 Attorney-General's Chambers of Singapore, 2012), https://sso.agc.gov.sg/Act/PDPA2012.
[149] Intersoft consulting, "General Data Protection Regulation (GDPR) – Legal Text," General Data Protection Regulation (GDPR) (intersoft consulting, May 25, 2018), https://gdpr-info.eu/.
[150] OneTrust DataGuidance et al., "GDPR v. Singapore's PDPA," *Comparing Privacy Laws*, July 2022, https://www.dataguidance.com/sites/default/files/gdpr_v_singapore_2022_july_update.pdf.
[151] Ibid.

pandemic, mandatory digital contact tracing tools.[152] The deployment of surveillance robots to monitor public spaces has further amplified fears of a surveillance state.[153] Critics contend,[154] that such measures erode civil liberties, foster self-censorship, and lack transparency, particularly after revelations that COVID-19 contact-tracing data was used for law enforcement purposes despite government assurances to the contrary, sparking rare public backlash and highlighting the risks of mission creep.

In response to mounting public unease and international scrutiny, Singapore implemented new safeguards and policy reversals.[155] Legislation now restricts law enforcement's access to data collected for public health and administrative purposes, requiring stricter authorization and transparency. The Personal Data Protection Commission (PDPC) issued guidance clarifying the use of sensitive identifiers like National Registration Identity Card (NRIC) numbers,[156] banning their use as default passwords or identifiers without explicit consent. Additionally, regulatory oversight and enforcement have intensified, especially in sectors handling sensitive data, with a rise in investigations and fines issued in 2024 and 2025.[157]

While the Singapore's history of pervasive surveillance has drawn significant criticism, its recent policy recalibrations demonstrate a willingness to enhance transparency and protect individual rights. Given these, the crucial next step for the country is to take firmer action on AI governance.

Conclusion

ASEAN's Digital Masterplan 2025 upholds personal data protection in its digital transformation agenda, positioning it as a cornerstone for building trust in digital services

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152 EngageMedia, "Singapore under the Pandemic: The Normalisation of Digital Authoritarianism," ed. James Gomez, Global Voices Advox (GlobalVoices advox, July 12, 2023), https://advox.globalvoices.org/2023/07/12/singapore-under-the-pandemic-the-normalisation-of-digital-authoritarianism/.
153 AFP, "Singapore Patrol Robots Stoke Fears of Surveillance State," *Bangkok Post*, October 6, 2021, https://www.bangkokpost.com/world/2193355/singapore-patrol-robots-stoke-fears-of-surveillance-state.
154 AFP RELAXNEWS, "Singapore Admits Police Can Access Contact-Tracing Data," *Awani*, January 6, 2021, https://international.astroawani.com/global-news/singapore-admits-police-can-access-contacttracing-data-276397.
155 Kenny Chee, "Bill Limiting Police Use of TraceTogether Data to Serious Crimes Passed," The Straits Times (The StraitsTimes, February 2, 2021), https://www.straitstimes.com/singapore/politics/bill-limiting-use-of-tracetogether-for-serious-crimes-passed-with-govt-assurances.
156 Personal Data Protection Commission Singapore, "PDPC," PDPC's reply to media queries on the use of NRIC numbers (2025 Personal Data Protection Commission, December 14, 2024), https://www.pdpc.gov.sg/news-and-events/press-room/2024/12/pdpcs-reply-to-media-queries-on-the-use-of-nric-numbers.
157 David Sun and Angela Tan, "$3b Money Laundering Case: 9 Financial Institutions Handed $27.45m in MAS Penalties over Breaches," The Straits Times, July 4, 2025, https://www.straitstimes.com/singapore/3b-money-laundering-case-9-financial-institutions-handed-27-45m-in-mas-penalties-over-breaches.

and enabling cross-border digital trade. It encourages the development of harmonized, principles-based privacy regimes across member states, aligning with global standards.

Importantly, personal data protection is also generally recognized as foundational to ASEAN's evolving AI governance landscape. Across the region, countries are updating and strengthening their privacy laws to ensure that AI is developed and deployed responsibly. From Singapore's PDPA and AI-specific guidelines, to the Philippines' Data Privacy Act and Indonesia's 2022 Personal Data Protection Law, member states are integrating privacy, transparency, and accountability into their national frameworks.

Looking forward, ASEAN's efforts in AI governance would be significantly strengthened by deeper regional cooperation on data protection standards. As international discussions on AI governance gain momentum, ASEAN has the opportunity to enhance regulatory alignment and knowledge sharing. Initiatives like Singapore's AI Verify Toolkit can serve as regional reference points for aligning privacy and transparency expectations in AI systems.

ASEAN's soft-law approach, favoring voluntary compliance and flexibility over rigid mandates offers a practical path for countries at different levels of technological readiness. However, as AI systems become more powerful and embedded in critical sectors, this flexibility must be balanced with binding safeguards to ensure that corporate incentives do not compromise safety and individual rights. ASEAN's commitment to data protection, combined with its collaborative governance style, positions the region to shape a responsible, inclusive, and globally relevant model for AI governance, one that safeguards personal data while fostering innovation and economic growth.

Note: Grammar in this document has been reviewed with the assistance of AI tools, including ChatGPT.

INFORMATION RESILIENCE & INTEGRITY SYMPOSIUM

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in the Asia-Pacific: Actions and Adaptations

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