



TMI Eyes No. 32: PDPA Enforcement

Personal Data Breach Cases with total fines THB 14.5m

TMI provides an update on the enforcement of the Personal Data Protection Act B.E. 2562 (2019) (PDPA), following the Personal Data Protection Committee's (PDPC) announcement of administrative penalties imposed on companies and individuals in Thailand for five new personal data breach cases in 2025. In August 2025, the PDPC issued an update regarding these cases.

The implicated data controllers and data processors in these cases were fined a total of more than 14.5 million Thai baht.

The administrative penalties in all 5 cases

No.	Entities	Incidents	Non-compliance issues	Complaint and Compensation	Penalties (THB)
1	Government Agency	Personal Data was hacked and illegally posted on the Dark web	● Failure to provide appropriate security measures ● Failure to execute a DPA	None of the complaints	153,120
	System Developer		● Failure to provide appropriate security measures ● Failure to protect against the risk of data leakage		153,120
2	Private Hospital	Sensitive Personal Data was leaked to be used as snack paper bags, which was posted on the Internet.	● Failure to oversee the destruction process of its data processor	Becoming news on Social Media	1,210,000
	Individual Data Processor		● Failure to implement the agreed procedures to destroy the personal data ● Failure to notify the private hospital of the data breach		16,940
3	Computers and equipment sales company	Personal Data was leaked and used by a gang of scammers	● Failure to provide appropriate security measures ● Failure to report to the PDPC on the personal data breach incident ● Failure to appoint a DPO	None of compensation	7,000,000
4	Cosmetics company	Personal Data was leaked and used by a gang of scammers	● Failure to provide appropriate security measures ● Failure to report to the PDPC on the personal data breach incident	-	2,500,000
5	Toy company	Personal Data was leaked	● Failure to provide appropriate security measures	The company compensates the sufferers	500,000
	System Developer		● Failure to provide appropriate security measures	None of compensation	3,000,000

Key points of lessons learned from all 5 cases

1. The core non-compliance issue is a personal data breach.

According to the disclosed penalty cases, it is evident that the core non-compliance issue is data leakage resulting from inadequate security measures. This emphasizes the importance of implementing appropriate security measures.

2. Both a data controller and a data processor will be penalized.

It is not only a data controller who has an obligation to put in place appropriate security measures in order to prevent a personal data breach, but a data processor itself also has the obligation to implement its adequate security measures. In case a data processor is penalized, a data controller who outsources such data processor will also be subject to a penalty. Therefore, data controllers must supervise their data processors to ensure that the data processors have adequate security measures in place and that personal data is handled appropriately.

3. The amount of fine will be different due to the consideration of the expert committee.

When determining administrative fines, the expert committees of the PDPC will take into account several factors, including the business scale of a data controller or a data processor, remediation and mitigation of damage that are carried out by a data controller or a data processor, and compensation to relieve the damage arising to sufferers of incidents.

Based on the aforementioned criterion and the determination of the disclosed cases, the decision of the expert committees may trend as follows:

- (a) compared to smaller businesses or individuals, large-scale businesses may be subject to higher fines; and
- (b) businesses that refuse to compensate the sufferers may be imposed with heavier penalties, possibly maximum fines.

TMI's Note

The aforesaid cases are simply five incidents that have been decided among the several pending cases under investigation, demonstrating the serious and stringent enforcement of the PDPA by the PDPC. Therefore, this serves as a warning to companies subject to the PDPA to regularly inspect and ensure the implementation of security measures to prevent a personal data breach, in order to avoid any risk of penalties.

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