

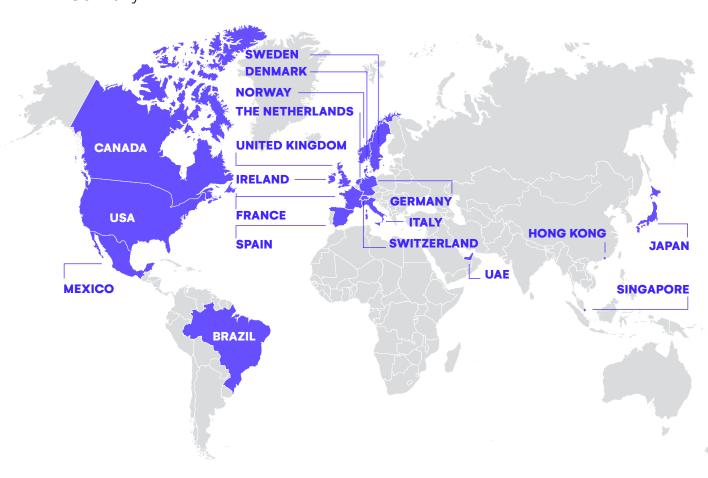
# GLOBAL HIRING GUIDE: DATA PRIVACY

Salary data and hiring considerations, country by country



# **CONTENTS**

01. INTRODUCTION	03	Switzerland	26
OO DEGIGNAL AND COUNTRY		The Netherlands	28
02. REGIONAL AND COUNTRY	0.7	Spain	30
GUIDES	06	Italy	32
		Sweden	34
		Norway	36
2.1 AMERICAS	06	Denmark	38
USA	08	United Arab Emirates	40
Canada	10		
Brazil	12	2.3 ASIA - PACIFIC	42
Mexico	14	Singapore	44
		Japan	46
2.2 EMEA	16	Hong Kong	48
United Kingdom	18		
Ireland	20		
France	22	03. CONCLUSION	50
Germany	24	04. CONTACT	51



### 01.

### INTRODUCTION

Welcome to Leonid's Global Hiring Guide for the data privacy sector.

We will start by taking a look at some of the key global issues which have affected how data privacy teams operate around the globe, as well as the evolving role of a data privacy officer. We then move onto a country-by-country overview, which should act as a useful reference guide for anyone hiring overseas. We provide average salary ranges, along with key hiring considerations, both cultural and practical.

#### A global overview

As organisations collect an ever-growing amount of data, governments around the world have undertaken major initiatives to protect consumer data privacy. This has resulted in a wide range of recent laws and regulations. What they all share in common is the desire to balance protecting individual rights and facilitating economic growth.

However, due to the multitude of laws internationally, the result is a complex regulatory landscape with ranging nuances between regions, countries – and even within countries.

# Key data privacy issues and likely challenges throughout 2024

#### **AI Transparency and Ethics**

As Al applications become more ubiquitous, concerns about their transparency, bias, accuracy and potential misuse will only intensify. Expect regulations and frameworks to focus on explainable Al, mitigating bias in algorithms, and ensuring ethical considerations are embedded in Al development and deployment.

#### **Biometric Data**

The use of facial recognition, voice recognition and other biometric data is booming, raising concerns about privacy violations, identity theft and potential discriminatory applications. Expect regulations to tighten around biometric data collection, storage, and use, with a focus on individual consent and robust security measures.

#### **Data Sovereignty and Localisation**

The battle for data control will escalate through 2024, with countries vying for sovereignty over data generated within their borders. Expect cross-border data flows to face additional scrutiny and restrictions, potentially impacting international businesses and hindering data-driven innovation.



#### **Surveillance & Government Access**

With growing concerns about online security and disinformation, governments may push for increased access to user data. This raises worries about mass surveillance and the need to strike a balance between security and privacy.

#### **Evolving Regulatory Landscape**

The regulatory landscape will remain dynamic, with existing laws like GDPR undergoing revisions and new regulations emerging in different regions. More detail on the key changes are detailed in the regional sections within this guide.

#### **Cybercrime and Data Breaches**

The threat of cyberattacks and data breaches will remain a significant concern, with attacks becoming more frequent and increasingly sophisticated. Expect stricter data security regulations and a sharper focus on incident reporting and response.

#### **Privacy Education and Awareness**

As data privacy becomes increasingly complex, empowering individuals with knowledge and tools to exercise their rights will be crucial. Alongside public awareness campaigns, organisations have a responsibility to ensure their workforce is fully updated on key changes, threats and overall digital literacy, so that they can navigate the digital world with confidence.

# Key Priorities for DPOs and Privacy Professionals

Key priorities for DPOs and privacy professionals to consider in 2024 include:

- Ensuring processing activities are properly documented, in preparation for upcoming changes in the law and compliance standards.
- Ensuring the Record of Processing Activity (ROPA) is accurate and up-to-date.
- Making sure DPIA templates are fit for purpose especially as AI systems may be used in the future.
- Checking data flows are mapped and the organisation has the right documentation to support international data transfers, including the use of standard contractual clauses (SCCs), or registration under EU/US Data Privacy Framework.
- Keeping up to date with adequacy reviews. The EU continues to monitor developments in privacy laws in those countries which have received adequacy decisions and the issue of transfers between the EU and the UK and USA is particularly important.

#### Roles and Responsibilities in Data Privacy

#### The CISO-DPO Dilemma

While in some cases, a Chief Information Security Officer (CISCO) fulfils a dual role as Data Privacy Officer within the same



organisation, this can lead to potential conflicts of interest. A CISO is primarily responsible for managing and leveraging data and information technology for the company's benefit, which is somewhat at odds with the DPO's role in ensuring data protection and compliance.

Therefore, we recommend that data privacy officers fulfil the one role only. With a complex regulatory environment to navigate, there is no doubt the workload is there.

#### **Al Governance**

Who should handle matters pertaining to artificial intelligence is a major point in the data privacy world, not least of all because it's still a relatively new area for businesses. Handing AI governance to privacy officers certainly makes sense from an organisational perspective. Top privacy officials are embedded into the heart of any organisation and so typically have strong stakeholder relationships spanning all operational functions, as well as the front line. DPOs also have experience building privacy law compliance frameworks, which can be adapted for AI governance.

DPOs should seize this opportunity to take on the responsibility in order to unlock funding, raise privacy back up the risk register – and for their own CVs, as experience in Al compliance is highly sought–after.

Although data privacy officers are increasingly leading on AI, it is still typically a multi-disciplinary effort, with team members from sales and product involved in shaping the

strategy.

# Talent Management, Recruitment and Retention

While 2023 was a difficult year for many areas of recruitment, data privacy remained relatively buoyant. There was some loss of momentum with GDPR and projects were considered 'done' or 'good enough'. However, as the world faced into more privacy threats, organisations worldwide took regulatory changes seriously, thereby continuing to add to their teams. We also expect to see an uptick in recruitment on the back of the opportunities offered by AI regulation and compliance.

Data privacy remains a candidate's market, with demand for specialist data privacy skills still higher than supply.

However, employers have become more demanding, with employees expected to do more, with less. This is not a trend restricted to data privacy, but rather a widespread shift affecting all in-house operational teams, driven by the current economic climate and pressure to keep costs down. This means that employers are keen to hire data privacy specialists who are both subject matter experts and at the same time generalists, who can work flexibly according to where the need is greatest at any given time.

Please note that the following salary data is a guide only and that bands will vary significantly according to industry sector, size and age of the organisation.





02.

### **REGIONAL & COUNTRY GUIDES**

### 2.1 AMERICAS — SUMMARY

#### **US Privacy Law**

Companies are navigating an increasingly complex set of laws for how they collect and use personal information, as individual US states differ in their approaches to improving data privacy standards.

Thirteen states have now enacted broad consumer privacy laws to give people more control over their data, a count that more than doubled in 2023. A few have also approved new safeguards specifically for health data, and for the data of children and young adults and more are expected to follow suit over the course of 2024.

The pace of adding new laws to the patchwork means the US state privacy landscape is rapidly changing, and compliance has become more difficult across a variety of industries. While some of the laws are similar in structure, each has its own nuances, such as how certain categories of data are defined.

This patchwork system—and the gaps it

creates— incited some lawmakers and advocates to push for a uniform data privacy system for the entire US.

In April 2024, a new bill was proposed – the American Privacy Rights Act (APRA) — which calls for nationwide standards on the collection, use and transfer of consumer data online.

The legislation prompts ongoing questions about whether a federal law should take precedence over existing state laws.

Meanwhile, the ongoing existence of multiple legislations across the US makes the role of a data privacy officer in North America one of the most complex in the world.

#### Canada

Bill C-27 - Digital Charter Implementation Act, 2022: Currently undergoing parliamentary review, this Canadian privacy bill could potentially revolutionise privacy regulation in the country's private sector. If passed in

late 2024 as anticipated, it would replace the outdated Personal Information Protection and Electronic Documents Act (PIPEDA) with stricter data access and usage rules, handing individuals greater control over their personal information and holding businesses more accountable.

**Brazil** 

The priorities of the Brazilian Data Protection Authority or Autoridade Nacional de Proteção de Dados for 2024 include monitoring and guiding organisations regarding data subject rights; the monitoring and protection of children and teenagers regarding their personal data on digital platforms, identifying potential risks in the use of Al and monitoring data scraping and data aggregation.

Mexico

As with the US and UK, 2024 is an electoral year. The use of technology and access to people's personal information will be crucial in the outcome of the presidential election.

Al can be used to great effect in terms of spreading disinformation, particularly as Mexico still has no legislation that specifically regulates it. However, with an increased focus on data protection globally, Mexico may be subjected to new data privacy regulations, which will have a marked impact on any business which operates in this region.



### **USA**

With a GDP of more than USD\$23 trillion, the United States is a leader in several key industries, including technology, oil and gas and renewable energy. The country has one of the largest tech markets in the world, with four cities ranking in the top 10 for global fintech, including Silicon Valley (#1) and Boston (#7).

The United States workforce serves as the backbone of its economy. Employment rates have been steadily rising, with the notable exception of the COVID-19 pandemic which led to the phenomenon coined as the "Great Resignation," prompting workers to contemplate the trajectory of their lives.

We are now seeing a re-stabilisation of the employment market, and the Corporate Governance world is no exception.

The US is an exciting place to work and to do business with, but in terms of hiring, it does bring a degree of complexity due to a number of stringent labour laws.

Ease of doing business ranking = 6

CAPITAL	Washington
LANGUAGES SPOKEN	English
POPULATION	332 million
PAYROLL	Varies; usually weekly or bi-weekly
CURRENCY	US Dollars (USD)
VAT	Nil



- Most companies in the U.S. operate on an 'at-will' basis. This means that employees can leave their jobs at any time, for any reason. Companies can terminate their employees' service - with a few exceptions - without giving notice or providing redundancy pay.
- Many companies do give notice as a courtesy, but the law does not require it. Some companies also negotiate severance pay, especially for higher-level executives.
- The practice of at-will employment means signing formal employment contracts is not a common practice in the U.S. Some companies use them, especially for key executives or other important members of a firm. However, contracts are not standard.
- The standard workweek in the U.S. consists of 40 hours — eight hours per day, five days per week. However, variations on this schedule are common.
- There is no legal requirement to give paid holidays; however, on average, US workers will take 10 vacation days per year.

#### **Cultural Considerations**

- In the US, business culture places a strong emphasis on equality and nondiscrimination. This is reinforced by numerous laws including the Civil Rights Act of 1964, which prohibits discrimination based on race, colour, religion, sex, or national origin in any aspect of employment.
- The 'hustle mentality' is a prominent aspect of the work culture in the United States. It encompasses a mindset that emphasises relentless effort, ambition, and a constant drive for success. It is deeply ingrained in the American work ethic, with many professionals adopting a "work hard, play hard" approach to their careers.

"The USA is where we see the majority of our global CPO hires. The demand for skilled data privacy professionals at all levels, particularly in hubs such as California, New York, and Boston, is robust. However we're seeing several searches across the country rising in states such as Texas; likewise in 'hard to hire' areas, like Ohio or Colorado."

Phil Redhead Leonid Group

#### **SALARY GUIDE USA**

TITLE	SALARY RANGE (USD)
Privacy Engineer	\$135,000 - \$250,000
Senior Data Protection Manager	\$135,000 - \$220,000
Privacy Counsel	\$150,500 - \$350,000+
Data Protection Officer	\$250,000 - \$350,000+
Chief Privacy Officer	\$300,000 - \$700,000+

### **CANADA**

Canada has a robust economic base, low taxes, abundant natural resources, and a stable political climate. These factors create an environment for international businesses to flourish. When it comes to ease of payment for small to medium-sized businesses, Canada has one of the lowest tax burdens among the G7 countries.

Canada's economy is also one of the most resilient in the world, with a GDP of \$1.98 trillion in 2023.

Hiring in Canada has become increasingly popular among foreign companies as the country offers a diverse and highly skilled labour force.

Ease of doing business ranking = 23

CAPITAL	Ottawa
LANGUAGES SPOKEN	English, French
POPULATION	38.7 million
PAYROLL	Bi – weekly
CURRENCY	Canadian Dollars (CAD)
VAT	5%



- Canada is officially a bilingual country, home to both English and French speakers. Fluency in English will be enough to navigate around the vast majority of Canadian cities and provinces.
- Each province in Canada has its own employment standards legislation that outlines minimum requirements for employment relationships. These standards cover areas such as hours of work, overtime pay, vacation entitlement, public holidays and termination notice.

#### **Cultural Considerations**

- Canadian workplaces are typically friendly and non-hierarchical compared with other nations, and there is a strong emphasis on harmonious and social environments. Therefore, friendly chatter — or small talk

   is very much the norm when meeting
   Canadian workers.
- Punctuality and good manners are both expected and highly valued.

"Canada's data privacy landscape has been boosted since the Digital Charter Implementation Act in 2022. This led to an increase demand for data privacy experts within in-house teams, particularly those with expertise in compliance and risk management."

Phil Redhead Leonid Group



#### **SALARY GUIDE CANADA**

TITLE	SALARY RANGE (CAD)
Privacy Engineer	\$85,000 - \$110,000
Senior Data Protection Manager	\$85,000 - \$110,000+
Privacy Counsel	\$95,000 - \$140,000
Data Protection Officer	\$110,000 - \$160,000+
Chief Privacy Officer	\$200,000 - \$400,000+

### **BRAZIL**

As the largest and most populous country in South America and the eighth-largest economy in the world, Brazil is an attractive place for companies looking to expand globally. Brazil does however present some challenges for international companies, with strong employment laws in place that favour local employees.

Ease of doing business ranking = 124

CAPITAL	Brasília
LANGUAGES SPOKEN	Portuguese
POPULATION	212 million
PAYROLL	Monthly
CURRENCY	Brazilian Real (R\$)
VAT	VAT on Sales and Services are PIS/COFINS  — at 9.25%, & Municipal Service Tax (ISS) with rates varying from 2 to 5% depending on the Municipality in which the company is located.



- In addition to regular pay, employees in Brazil are entitled to a 13th-month salary paid in 2 instalments each year; usually split across November and December. The 13thmonth payment is a legal benefit and is not part of the base salary.
- Unions and collective bargaining agreements are common in Brazil.
- The working week is 44 hours, which can be divided across the five weekdays or can be eight hours Monday through Friday with a half-day on Saturdays. When employees work overtime, they should receive 1.5 times their usual hourly wages or double their usual pay if it is a holiday or Sunday.
- Brazil is the only Portuguese-speaking country in South America, and Spanish the prevailing language throughout the rest of the continent — is not a very common second language for Brazilians. It is expected that employees in Brazil will speak a good level of Portuguese.

#### **Cultural Considerations**

- Despite the friendly atmosphere among teams, there are strict hierarchies that are routinely followed when it comes to decision-making. Typically, only the most senior leaders will make the important decisions, and often without consulting more junior colleagues.
- Brazilians often prefer working with either people they know, or, with someone who has been recommended — which means it can take time for an unknown outsider to gain trust.
- Brazilians are notoriously 'time fluid', so it's not unusual for meetings to start late or for deadlines to be extended.

"Brazil's Lei Geral de Proteção de Dados (LGPD) has significantly influenced the data privacy sector, mirroring global trends towards stricter data protection regulations. This has spurred growth in demand for legal professionals specializing in data privacy, especially within sectors such as technology and B2C organisations."

Phil Redhead Leonid Group

#### **SALARY GUIDE BRAZIL**

TITLE	SALARY RANGE (R\$)
Privacy Engineer	R\$ 116,000 - R\$ 286,000
Senior Data Protection Manager	R\$ 155,000 - R\$ 350,000
Privacy Counsel	R\$ 250,000 - R\$ 400,000+
Data Protection Officer	R\$ 1200,000 - R\$ 320,000+
Chief Privacy Officer	R\$ 300,000 - R\$ 500,000+

### **MEXICO**

Mexico is an increasingly attractive prospect for international businesses who want to move their operations closer to the U.S market, while retaining a competitive cost-base; a practice known as 'nearshoring'. This has led to a marked increase in recruitment activity in Mexico.

Mexico has also recently implemented new legislation which makes employers responsible for higher ethical standards, especially with respect to supply chain due diligence

Ease of doing business ranking = 60

CAPITAL	Mexico City
LANGUAGES SPOKEN	Spanish
POPULATION	126.7 million
PAYROLL	Monthly or Bi-Monthly
CURRENCY	Mexican Peso (MXN)
VAT	Standard VAT of 16% / 8% reduced at Southern and Northern borders / 0% exports, medicine, milk, wheat, meat and corn and a few agriculture services



- The standard workweek is 48 hours, with an eight-hour workday
- Overtime: Employees receive 200% of their regular wage for the first nine hours of overtime per week and 300% for any additional hours.
- Bonuses: Employees are entitled to an annual Christmas bonus ('aguinaldo') in mid-December worth 15 days of their salary, though many employers pay four weeks' worth.
- Employers must pay all wages and statutory payments in pesos to a government designated in-country bank account. If hiring from overseas, it is important to be aware of this as it can cause delays when setting up payroll in Mexico.
- Under Mexican federal labor law, termination and resignation notices are not mandatory.
   Once your employee has worked for your company for a month, they become an indefinite employee and, except in cases of gross misconduct, are entitled to three months' severance pay.

#### **Cultural Considerations**

- The work culture in Mexico places a significant emphasis on hierarchy and respect for authority; addressing superiors with proper titles and using formal language is expected.
- Mexicans tend to value politeness and diplomacy in their communication styles.
   Direct criticism or disagreement may be perceived as rude or confrontational, leading to strained relationships.
- The concept of "mañana" (tomorrow) is deeply ingrained in Mexican culture and has implications for punctuality. While punctuality is valued in professional settings, it is not uncommon for appointments and meetings to start a little later than scheduled and for deadlines to have a degree of flexibility.

"Mexico's demand for data privacy expertise is on the rise, both from domestic companies and international firms looking to expand their legal and compliance teams within the region. While cost-effectiveness remains a draw for expanding legal functions, the market for mid-level data privacy professionals is becoming competitive."

Phil Redhead Leonid Group

#### **SALARY GUIDE MEXICO**

TITLE	SALARY RANGE (MXN)
Privacy Engineer	MXN 500,000 - MXN 1,000,000
Senior Data Protection Manager	MXN 750,000 - MXN 1,500,000
Privacy Counsel	MXN 1,000,000 - MXN 1,875,000
Data Protection Officer	MXN 650,000 - MXN 1,250,000
Chief Privacy Officer	MXN 1,250,000 - MXN 2,500,000



### 2.2 EMEA – SUMMARY

The European Union has been a driving force for data privacy and cybersecurity legislation and it has set the precedent for other nations to follow suit.

#### **EU Artificial Intelligence Act**

In March 2024, the EU passed its Artificial Intelligence Act, which prescribes higher scrutiny for higher-risk uses of Al—such as credit scoring for loans, or law enforcement.

Al applications are now classified under four categories of risk ("unacceptable", "high", "limited" and "minimal"), plus one additional category for general-purpose Al (such as ChatGPT). Applications deemed to represent unacceptable risks are banned. High-risk ones must comply to security, transparency and quality obligations and undergo conformity assessments. Limited-risk Al applications only have transparency obligations, and those representing minimal risks are not regulated.

The Act further proposes the introduction of a European Artificial Intelligence Board to promote national cooperation and ensure compliance with the regulation.

The EU has succeeded in creating much more than a blueprint for AI regulation going forward. Enterprises throughout the world are advised to pay attention, as compliance will be critical and non-compliance will result in hefty penalties.

#### **Centralised GDPR**

European privacy regulators are also considering reforms to GDPR, focusing on making the law's enforcement smoother across borders, so that countries have a more unified approach. A review will kick off next year, laying the basis for the European Parliament and European Commission to propose changes in 2025. No material changes will be made to European data protection law in the near term, however.

#### Potential UK shift away from GDPR

Following Brexit, the UK government proposed new legislation, the Data Protection and Digital Information Bill, which was intended to simplify and update the UK's data protection framework while reducing the compliance burden on organisations and creating more flexibility. It is unlikely that this adversely affect international employers, but it may make data protection compliance easier for domestic companies. One concern of this new approach is whether this 'dilution' of GDPR might impact the adequacy decision which the UK has been granted by the EU (which if lost, could mean a significant amount of additional paperwork for UK businesses when it comes to data transfers from the EU to the UK). The Bill is currently working its way through the approval process and is expected to be implemented at

some point in 2024.

#### First wave of DMA enforcement

Companies designated as 'gatekeepers' under the Digital Markets Act (DMA) began complying with the DMA as of March 2024. The European Commission has already indicated that it will "rely on the full array of DMA enforcement powers, including the ability to initiate investigations for non-compliance and impose hefty fines, to continue working towards full and effective compliance".

Key data-related provisions include, for instance, requirements for gatekeepers to obtain end-user consent to combine or cross-use personal data from a core platform service (CPS) with personal data from their other services; refrain from using nonpublic data of business users – collected by their CPS – to compete against the business users on the platform; and give business users access to continuous and real time data on their use of the CPS, including data on their end users' engagement on that platform.

#### Investor concerns around ESG and privacy

The EU's newly-implemented Corporate Sustainability Reporting Directive (CSRD) requires large companies and publicly listed companies operating in the EU to report on the ESG impact of their activities. As a result, the topic of ESG has gained significant traction in the last couple of years, and data processing and data security are also seen as areas that can impact on ESG, if not managed appropriately. Examples include not only appropriate data governance and enabling data subjects to effectively exercise their rights but also assessing the environmental impact

of data hosting and processing facilities.

#### Al governance

In 2024, companies will continue to develop and integrate AI into their products and processes. As regulations affecting AI take shape in parallel, organisations will need to implement robust governance. Such a framework will help identify and minimise risk and liability and document compliance efforts. This will not only be relevant under the AIA and the GDPR, but also under the Digital Services Act (DSA), which includes obligations on auditing algorithms. In late 2023, the International Organization for Standardization (ISO) also published its standard on Al management systems. This globally recognised standard will likely serve as a helpful tool for companies building their Al governance framework in 2024.

# Al Data Collection – a Key Question for EU Regulators

Al has been proven as a highly effective data extracting tool, but it is at odds with the limitations of EU privacy law on information collection, making it one of the most critical issues for policymakers.

Generative AI platforms have already been subject to sanctions from privacy regulators in the EU. ChatGPT was blocked in Italy in March 2023, when the country's data protection authority investigated the platform (access has since been restored). Companies developing and using the technology should perform self-assessments on how they are using data, rather than putting it at risk of being banned by regulators.



### UNITED KINGDOM

According to The Global City, the United Kingdom is a 'global centre of academic excellence.' 58.5% of the UK's workforce are educated to at least a degree level, making it one of the most skilled workforces in the world.

It's been a turbulent few years for the UK politically and economically, following its departure from the European Union. Many talented workers from neighbouring European countries were forced to move away. However, the employment market remains robust, and wages are relatively competitive versus many of its European counterparts.

The UK workforce has seen a notable shift towards remote and hybrid work arrangements due to the impact of the COVID-19 pandemic, along with a high emphasis on employee wellbeing. Environmental sustainability is also growing in importance for both employers and employees.

Ease of doing business ranking = 8

CAPITAL	London
LANGUAGES SPOKEN	English
POPULATION	67.22 million
PAYROLL	Monthly
CURRENCY	Pound Sterling (GBP)
VAT	20%



- The average working week is between 37 and 40 hours.
- Flexible working arrangements have become increasingly popular in recent years and many employees prefer to split their time between an office and working from home.
- Employers are required to offer British workers at least 5.6 weeks of paid leave. This may include public and bank holidays, of which there are eight in the UK. For someone who works full-time, this will equate to 28 days of paid holiday.
- British workers between the ages of 22 and state pension age who earn £10,000 or more per year and usually work in the UK are legally entitled to a pension scheme, provided by their employer.

#### **Cultural Considerations**

- Handshakes are expected when you meet someone for the first time
- Businesses place high importance on good etiquette when it comes to phone and email communication; blunt messages can be interpreted as rudeness
- Workplaces are friendly and dress codes range from casual to formal, depending on the industry and the company's individual culture.

"After a period of cautious hiring practices, there's a steady renewed interest in bolstering in-house data privacy teams, though hiring at the midto-senior bracket is fiercely competitive for top talent. The UK remains an attractive and highly developed market for EMEA DPOs; and Europe-based privacy teams."

Phil Redhead Leonid Group

#### **SALARY GUIDE UNITED KINGDOM**

TITLE	SALARY RANGE (GBP)
Privacy Engineer	£75,000 - £110,000
Senior Data Protection Manager	£75,000 – £100,000
Privacy Counsel	£85,000 – £130,000
Data Protection Officer	£100,000 - £150,000+
Chief Privacy Officer	£135,000 – £200,000

### **IRELAND**

With a population of 4.9 million people, Ireland offers a talented, well educated and diverse workforce, with low unemployment rates. This, combined with its modern and flexible employment law framework, creates an alluring business climate for both local and international companies. The top industries here are technology, financial services and pharmaceuticals. However, these sectors often experience skill shortages, so there is a growing trend towards employing more remote and freelance workers.

Many of the world's leading tech companies have set up a base in Ireland, including Facebook, Google and Apple.

Ease of doing business ranking = 24

CAPITAL	Dublin
LANGUAGES SPOKEN	English, Irish
POPULATION	5.1 million
PAYROLL	Monthly/Weekly
CURRENCY	Euro (N.B — Republic of Ireland only; Northern Ireland is pound sterling)
VAT	23%



- Ireland boasts a comprehensive legal framework governing employment, ensuring fair treatment and protection for both employers and employees. Key legislation includes the Employment Equality Acts, the Unfair Dismissals Acts, and the Minimum Notice and Terms of Employment Acts. These laws collectively address issues such as discrimination, termination procedures, and basic employment terms. It is crucial for employers to familiarize themselves with these statutes to ensure compliance and foster a harmonious work environment.
- Employers are responsible for making several mandatory contributions as part of the payroll process. These include Employer PRSI (Pay-Related Social Insurance) contribution. This contribution is a percentage of the employee's gross earnings and funds the country's social insurance program. The rate varies depending on the employment type and the employer's size.
- The probationary period for employees in Ireland can range from six months to two years, depending on the terms of their employment contract. During this period, the employer can assess the employee's suitability for the role and terminate the employment without providing a reason.
- The legal minimum annual leave is four weeks per year, but the majority of employers offer five.

• Ireland has truly embraced the trend for remote work. Since the Covid pandemic, around 60% of employees now work either fully or partly from home and a significant proportion work remotely. The Irish government has introduced legislation with grants employees the right to request reasonable adjustments to their working hours and place of work, after six months of employment.

#### **Cultural Considerations**

- Irish workplaces are typically relaxed, friendly and informal.
- Family, the traffic and weather are common conversation-starters! (Much like the UK, the Irish love to talk about the weather).
- The Irish are known for their good sense of humour.
- Business meetings often take place at social venues, such as bars and golf courses.

"Given Ireland's role as the European headquarters for numerous multinational tech companies, central figure in the "One Stop Shop" mechanism established under the GDPR. As such Ireland has a health market for senior DPO/CPO level talent, however suffers from an even worse shortage of mid-level professionals than the UK or mainland Europe."

Phil Redhead Leonid Group

#### **SALARY GUIDE IRELAND**

TITLE	SALARY RANGE (EUR)
Privacy Engineer	€75,000 - €115,000
Senior Data Protection Manager	€75,000 - €100,000
Privacy Counsel	€80,000 - €115,000
Data Protection Officer	€100,000 - €130,000
Chief Privacy Officer	€130,000 - €200,000+

### **FRANCE**

France is the third-largest economy in Europe, and the sixth largest in the world in terms of GDP. It is an advanced and industrialised country and is home to a sophisticated financial market. This, coupled with France's highly educated workforce, makes it an attractive place for business growth.

Several industries contribute to the French economy, namely energy, transport, manufacturing, technology, tourism and agriculture.

In the face of global economic challenges, France has maintained a relatively stable job market — as of December 2023, the national unemployment rate stands at 7.2%, outperforming the average rate in the European Union.

One of the key contributors to France's employment landscape is its thriving tech industry and a steadily growing financial services sector.

Ease of doing business ranking = 32

CAPITAL	Paris
LANGUAGES SPOKEN	French
POPULATION	67.39 million
PAYROLL	Monthly
CURRENCY	Euro
VAT	20%



- Probation periods are not mandatory in French employment contracts, but they typically last between two to four months.
- Notice periods: this depends on how long the employee has worked for the company.
   Employees will usually need to provide one month's notice if they've been employed for six months to two years.
- Employees who have been employed for more than two years usually must provide two months' notice, and those in executive positions may need to provide a threemonth notice.

#### **Cultural Considerations**

- French business etiquette is rather formal, and it's always better to err on the side of formality than to be seen as disrespectful.
- It's customary to address people by their formal title, such as Monsieur or Madame, until invited to use their first name.

- Handshakes are the norm in business situations, and it's considered polite to greet everyone individually when entering a room.
- The French place a high value on work-life balance. You may find that work hours are shorter than in some other countries, with 35 hours per week on average.
- French people tend to be direct in their communication

"France's CNIL (Commission Nationale de l'Informatique et des Libertés) continues to enforce GDPR compliance rigorously, maintaining France's need for data privacy expertise. While the French market offers cost-effective opportunities for recruitment compared with other Western European countries, demand for data privacy specialists – especially those with technology and AI expertise – is leading to competitive salary offerings.."

Phil Redhead Leonid Group

#### **SALARY GUIDE FRANCE**

TITLE	SALARY RANGE (EUR)
Privacy Engineer	€50,400 - €94,000
Senior Data Protection Manager	€70,000 - €112,000
Privacy Counsel	€80,400 - €114,000
Data Protection Officer	€85,000 - €110,000
Chief Privacy Officer	€115,200 - €173,400

### **GERMANY**

Germany has a diverse population of over 84 million people, with a highly skilled talent pool. The country places a high emphasis on education, with a literacy rate of 99% and an extensive system of universities and vocational schools.

The business climate is favourable, with a strong focus on innovation and a range of government incentives for business growth.

Germany's top industries include automotive manufacturing, chemical production, engineering, and healthcare. The country is the world's leading exporter of cars, with major companies such as Volkswagen, BMW, and Mercedes-Benz headquartered in Germany.

German employees value a positive work environment that fosters collaboration, creativity, and innovation. Studies have found that they prioritise work-life balance, job security and professional development opportunities.

Ease of doing business ranking = 22

CAPITAL	Berlin	
LANGUAGES SPOKEN	German, plus some regional dialects	
POPULATION	84.5 million	
PAYROLL	Monthly	
CURRENCY	Euro	
VAT	19%	



- The standard working week in Germany is 40 hours, with an average of 8 hours per day.
- Employers are obligated to provide health insurance, pension insurance, accident insurance and unemployment insurance to all employees.
- Bundesurlaubsgesetz the Federal Holiday
   Act dictates that employees get 20
   days of leave or 24 days if they work six
   days a week instead of five. However, most
   employers offer more this statutory minimum.
- Notice periods are typically stipulated in the employment contract and vary based on the length of service. For example, a standard notice period is four weeks but can be longer for employees with several years of service.

**Cultural Considerations** 

- Germans value punctuality, professionalism, and a thorough approach to business. Be prepared for structured and detail-oriented interactions with German professionals.
- While many Germans are proficient in English, especially in business settings, a basic understanding of the German language can be highly beneficial.

"Germany's reputation for strong regulatory enforcement continues to spur demand. However, the challenge lies in attracting top talent, as German professionals can still be less responsive to job advertisements. This has led to innovative recruitment strategies and a robust market for data privacy expertise."

Phil Redhead Leonid Group



TITLE	SALARY RANGE (EUR)
Privacy Engineer	€75,000 - €115,000
Senior Data Protection Manager	€75,000 - €100,000
Privacy Counsel	€95,000 - €115,000
Data Protection Officer	€120,000 - €200,000+
Chief Privacy Officer	€130,000 - €200,000+

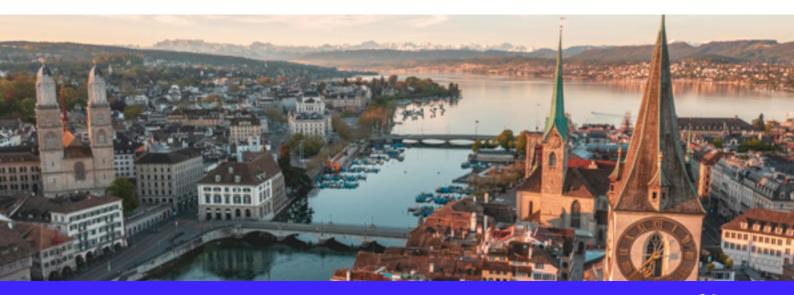
### **SWITZERLAND**

Switzerland is widely recognised as a 'safe haven' within Europe and a land of opportunity for both individuals and businesses to live and work. Given its relatively small size and a highly liberal economic structure, it can quickly adapt to internal and external challenges. Switzerland is renowned for its stable and reliable business environment, which is supported by its well-developed legal system and robust regulations.

Around two thirds of Switzerland's working population originate from EU countries, predominantly Italy, Germany, Portugal, France and Kosovo.

Ease of doing business ranking = 36

CAPITAL	Bern
LANGUAGES SPOKEN	German, French
POPULATION	8.7 million
PAYROLL	Monthly
CURRENCY	Swiss Franc (CHF)
VAT	8.1%



- The working week in Switzerland is 40 to 42 hours. Workers are generally entitled to 4 weeks' holiday.
- Notice periods are variable, typically ranging from one to six months.

#### **Cultural Considerations**

- Swiss work culture is rooted in formality.
   Formal business attire is generally expected and it is usual to address someone by their last name and title (e.g. Mr, Mrs, Dr) until they indicate otherwise.
- There are three main languages spoken in Swiss workplaces: German, French, English

   it is widely expected that job candidates would have fluency in at least two of these three.
- The Swiss value punctuality and direct communication, so when interviewing Swiss candidates, it is important that the interview is well-structured.

"Switzerland, with its stringent Federal Act on Data Protection (FADP), remains a key market for data privacy professionals, especially in sectors like pharmaceuticals, energy, and retail. The country's appeal as a destination for high-calibre legal talent from around the world is undiminished, with a steady demand for professionals who can navigate the complex interplay of Swiss and EU data protection regulations.."

Phil Redhead Leonid Group

#### **SALARY GUIDE SWITZERLAND**

TITLE	SALARY RANGE (CHF)
Privacy Engineer	CHF 135,000 - 190,000
Senior Data Protection Manager	CHF 120,000 - 185,000
Privacy Counsel	CHF 150,000 – 190,000
Data Privacy Officer	CHF 150,000 - 250,000
Chief Privacy Officer	CHF 250,000 - 400,000

### THE NETHERLANDS

The Netherlands is a forward-thinking nation, well connected to the other major economies of Europe and with a favourable fiscal climate, making it a prime country for sourcing multilingual and highly-skilled workers. The Dutch typically have excellent English language skills and many also speak German.

It is a small but mighty country, having the fifth-largest economy in the EU in 2023. The key industries here are aerospace, chemicals, energy, financial services, life sciences, IT and logistics.

The country has a strong focus on work-life balance, and family-friendly benefits are commonplace.

Dutch employment law is extensive, and regulations must be followed by any company that employs workers in the Netherlands, even if the organisation is registered in a different country.

Ease of doing business ranking = 42

CAPITAL	Amsterdam
LANGUAGES SPOKEN	Dutch, English
POPULATION	17.6 million
PAYROLL	Monthly
CURRENCY	Euro (EUR)
VAT	21%



- The Netherlands has an extensive social security system which covers employees for health, death, old age, long-term disability, certain medical expenses and childcare and unemployment.
- National insurance is compulsory for anyone permanently working in the Netherlands.
   Social security premiums (also referred to as employee insurance) must be paid entirely by the employer.
- Many people work part-time in the Netherlands and requests for part-time work can only be turned down if there is a strong, objective reason not to permit it.
- Probation periods can last for a maximum of two months for permanent employees. Fixedterm contracts permit a maximum of one month's probation.

#### **Cultural Considerations**

- The Dutch are known for their direct manner and honesty. It's not a case of being harsh; they simply value pragmatism and clear communication.
- Decision-making is very much done by consensus, with multiple stakeholders involved.
- Efficiency and punctuality are highly valued.
- Workplace hierarchies tend to be flat, with everyone encouraged to voice their views and senior management are typically open to challenge, so long as it is done respectfully.

"The Dutch data privacy market is buoyant, driven by its leading industries in agriculture, energy, chemicals, and shipping. The burgeoning technology sector adds to the demand for legal talent specialized in data privacy. While salaries for junior positions have seen a rise, senior roles have maintained steady compensation levels."

Phil Redhead
Leonid Group

#### **SALARY GUIDE NETHERLANDS**

TITLE	SALARY RANGE (EUR)
Privacy Engineer	€65,000 - €100,000
Senior Data Protection Manager	€72,000 - €107,000
Privacy Counsel	€75,000 - €130,000
Data Privacy Officer	€80,000 - €135,000+
Chief Privacy Officer	€110,000 - €200,000+

### **SPAIN**

Spain is one of the largest countries in Europe and home to a highly educated, diverse and international workforce.

Spain's economy is the fifth-largest in the European Union by GDP. The country's major industries include technology, tourism, textiles, automotive manufacturing and construction.

Compared with other EU countries, labour costs in Spain are relatively high, owing in part to high social security contributions and taxes. Nonetheless, the country remains a desirable destination for foreign workers, since the cost of living is generally lower — and there are the additional draws of a vibrant culture, great cuisine and a balmy climate.

Ease of doing business ranking = 30

CAPITAL	Madrid
LANGUAGES SPOKEN	Spanish
POPULATION	47.4 million
PAYROLL	Monthly
CURRENCY	Euro (EUR)
VAT	21%



- The standard working week is 40 hours.
   Some consumer-facing businesses do stop between 14:00 and 16:00 for 'siesta' and continue working until 8pm, but this is no longer usual practice in corporate environments.
- It is mandatory for employees to receive a thirteenth and fourteenth month's salary payment. The annual salary is usually split into 14 instalments, which includes the double salary payment made by the employer in July and December.
- Internationals who want to work in Spain must meet stringent requirements for work permits. EU citizens are exempt, but do need a certificate of residence if they plan to stay for over three months, while non-EU citizens need both a work and residency permit along with a firm job offer. Highly skilled foreign workers can apply for a Blue Card or a Highly Qualified Visa — options which allow them to work and live locally for up to four years if they meet specific requirements.
- **Cultural Considerations**
- Just like in social settings, Spaniards are relaxed and friendly at work. You'll be surrounded by approachable, humorous people who love to smile.

- Relationship-building is important here, and business talks or negotiations rarely take place without getting to know the other person first. So don't be alarmed at the slow pace of business meetings - or the personal questions.
- Overall, as Spaniards get more comfortable, they tend to be quite tactile, with hugs or a pat on the back or arm fairly common practice. You'll also notice that when they are comfortable, they may become quite animated and even interrupt someone. This is to be taken as a sign that someone is interested in what the other person is saying, rather than being rude.
- Working late into the evening is not uncommon; Spaniards typically eat their dinner late, at around 9pm.

"With Barcelona and Madrid as key hubs (Barcelona for us at Leonid, as well) the demand for data privacy experts is on the rise, driven by the technology and finance sectors and the cost-effective nature of the Spanish market compared to other western nations. That said, we find many professionals once they reach a certain point often look to advance their careers elsewhere in the EU.."

Phil Redhead Leonid Group

#### **SALARY GUIDE SPAIN**

TITLE	SALARY RANGE (EUR)
Privacy Engineer	€46,000 - €75,000
Senior Data Protection Manager	€67,000 - €102,000
Privacy Counsel	€74,000 - €110,000
Data Privacy Officer	€57,000 - €80,000
Chief Privacy Officer	€79,000 - €141,000

### **ITALY**

Italy is the third-largest economy in the European Union and the eighth-largest in the world. Its geographical position is beneficial for trade with Northern Europe, Southern Europe, the Middle East and North Africa, making Italy a great place for businesses to expand internationally. Tourism is the top income generator, followed by manufacturing.

Around 10% of Italy's workforce is made up of international employees and foreign-owned business accounts for approximately 19% of the country's turnover.

Italy's science, technology and engineering sector is growing rapidly and projected demand for employees in these sectors is expected to rise dramatically in the coming years, which presents excellent opportunities for well qualified individuals in this space.

Ease of doing business ranking = 58

CAPITAL	Rome
LANGUAGES SPOKEN	Italian
POPULATION	60.4 million
PAYROLL	Monthly
CURRENCY	Euro (EUR)
VAT	22%



- Individual income taxes in Italy fall into different bands (23%, 35%, 43%) depending on the employee's income.
- Both employers and employees are obliged to make social security contributions. The total rate is around 40% of the employee's gross compensation, of which 30% is paid by the employer.
- Italy has unique parental leave legislation. Pregnant Italian employees don't work from two months before the birth date and for three months afterwards, during which they receive at least 80% of their pay. There are also five days of compulsory paternity leave, after the birth.
- Standard working hours are between 9:30 and 18:30, Monday to Friday. Lunch breaks can be up to two hours long.
- Employees are entitled to a minimum of 22 days' annual leave, along with 12 public holiday days.

#### **Cultural Considerations**

• Flexibility is generally more valued than punctuality in Italian business culture. It's not uncommon for people to turn up late for meetings or for these to overrun — especially if it's a lunch meeting! However, it is always expected that candidates will be on time for a job interview.

- Freedom to express opinions is very much the 'modus operandi' of Italian businesses.
- Interpersonal relationships are highly valued in the workplace, so for international workers, learning a few words of Italian can really help when getting to know colleagues.
- First meetings will rarely result in an immediate agreement between the participating parties. They are viewed as the opportunity to develop a sense of mutual trust and respect.

"Italy's data privacy market is anticipated to grow, especially given the Italian regulators more proactive approach to compliance, as seen in the recent (but brief) ban of ChatGPT."

> Phil Redhead Leonid Group

> > 99

#### SALARY GUIDE ITALY

TITLE	SALARY RANGE (EUR)
Privacy Engineer	€52,000 - €92,000
Senior Data Protection Manager	€57,000 - €100,000
Privacy Counsel	€69,000 - €115,000
Data Privacy Officer	€58,000 - €103,000
Chief Privacy Officer	€80,000 - €143,000

### **SWEDEN**

Sweden is renowned for its high quality of life, social welfare system and progressive attitudes.

The country is highly educated, with a literacy rate of 100% and a high percentage of the population holding advanced degrees. Employment laws in Sweden prioritise workers' rights, with significant protections for job security, parental leave and workplace safety. The business world here has a keen focus on innovation, sustainability and equal opportunities.

Sweden is an excellent country to set up or expand a business in, owing to its political stability, strong public finances, well-performing economy and reliable banking system. It also provides some of the EU's lowest corporate tax rates.

The key industries here are manufacturing, forestry and technology.

Ease of doing business ranking = 10

CAPITAL	Stockholm
LANGUAGES SPOKEN	Swedish
POPULATION	10.5 million
PAYROLL	Monthly
CURRENCY	Swedish Krona (SEK)
VAT	25%



- While the Swedish personal income tax is among the highest in the world, their social security benefits greatly offset the amount of taxes paid.
- Employers are required to pay Swedish employment social security contributions on compensation for employees covered by the system. These cover a range of events, including retirement pension, health insurance, labour fees and parental benefits.
- Work-life balance and wellbeing are vitally important in Sweden and many employers are now offering flexible working, additional annual leave and even unlimited annual leave.
- Gender equality is actively supported as well and it is expected that both mothers and fathers will share the 480 days leave which they are entitled to. Parents can take it at the same time or separately, all in one go or spread over time.
- **Cultural Considerations**
- Swedish people are very straightforward and humble. They value substance over showiness.
- Hierarchies in the workplace are typically flat, with everyone encouraged to contribute to ideas and discussions, regardless of seniority.

- Decision-making is driven by consensus from all stakeholders, so the process can take a little longer than in other cultures.
- Work-life balance is an absolute priority and there's a strong emphasis on putting family first. This attitude has no doubt contributed to the country's very low staff turnover rate.
- "Fika" is a Swedish tradition of taking a break to enjoy a hot drink and sweet treat with colleagues. It is viewed as an opportunity to bond, and discuss non-work topics, helping to cultivate an amiable atmosphere.

"Sweden's strong emphasis on digital innovation across sectors like technology, finance, and healthcare has led to an increased demand for data privacy professionals in Stockholm in particular. The Swedish market values expertise in GDPR compliance and data security, and is always attractive to those looking to emigrate.."

Phil Redhead Leonid Group

#### SALARY GUIDE SWEDEN

TITLE	SALARY RANGE (SEK)
Privacy Engineer	600,000 SEK - 1,000,000
Senior Data Protection Manager	900,000 SEK - 1,200,000
Privacy Counsel	850,000 SEK - 1,600,000
Data Privacy Officer	900,000 SEK - 1,900,000
Chief Privacy Officer	1,500,000 SEK - 2,500,000

### **NORWAY**

Norway is the best country to live in according to the United Nations, thanks to its impressive healthcare system and work-life balance.

Norway is home to one of the strongest economies in the world, and the country places a high priority on technology, knowledge development and sustainable business.

Norway is a world leader in energy, oil and gas and maritime sectors and is seeing huge developments in other areas, such as fintech, medtech and edtech. It is also rich in natural resources and is a leading European producer of renewable energy: 98% of the country's electricity production is based on renewables.

Ease of doing business ranking = 9

CAPITAL	Oslo
LANGUAGES SPOKEN	Norwegian
POPULATION	5.4 million
PAYROLL	Monthly
CURRENCY	Norwegian Krone (NOK)
VAT	25%



- Working hours in Norway are typically nine hours per day within a 24-hour period, or 40 hours per week within a seven-day work week.
- Employees (even those who are not residents) receiving remuneration for work performed in Norway are eligible for social security and pension contributions.
- Norway offers a generous maternity and paternity leave package. This is either 80% compensation rate of the average salary for 59 weeks or 100% of the average salary for 49 weeks. Parents also have the option to take a leave of absence for an additional year without compensation.
- Probation periods can be up to six months long.

#### **Cultural Considerations**

- Continuous development is important –
   Norway has the second highest participation rate in job-related continued education and training, in all of Europe.
- Norwegians are focused on high quality output and efficiency. They are honest and direct in their communication, but typically warm and friendly, too.
- Workplaces are generally quite informal in terms of business dress.
- Work-life balance and 'family time' are highly valued.

"Norway is seeing a growing demand for data privacy expertise, particularly due to the expansion of in-house legal functions and the country's adherence to GDPR. The market is competitive for junior roles, with companies seeking professionals who can navigate the complex landscape of data privacy and protection."

Phil Redhead Leonid Group

### **SALARY GUIDE NORWAY**

TITLE	SALARY RANGE (NOK)
Privacy Engineer	600,000 NOK - 1,200,000
Senior Data Protection Manager	900,000 NOK - 1,500,000
Privacy Counsel	1,000,000 NOK - 1,650,000
Data Privacy Officer	1,200,000 NOK - 1,800,000
Chief Privacy Officer	1,500,000 NOK - 2,500,000

# **DENMARK**

This small but perfectly formed Nordic country is renowned for its high standard of living, advanced welfare state and innovative business climate.

The country has a highly educated talent pool, with over 80% of the population having completed some form of post-secondary education. Denmark has strong employment laws which protect workers, such as a minimum wage, a maximum workweek of 37 hours and generous parental leave.

The Danish business culture is also attractive, with a low corporate tax rate, easy access to capital and a high degree of government support for entrepreneurship. The top industries in Denmark include information technology, life sciences, renewable energy, and food and agriculture.

Ease of doing business ranking = 4

CAPITAL	Copenhagen	
LANGUAGES SPOKEN	Danish	
POPULATION	5.8 million	
PAYROLL	Monthly	
CURRENCY	Danish Krone (DKK)	
VAT	0-25%	



- Employers must contribute to social security and other government initiatives on behalf of their employees. These contributions are typically calculated as a percentage of salary and are paid monthly.
- Income tax rates range from 0% to 55.8% depending on the employee's income level.
- Probationary periods can be up to three months long and no notice of termination is required by either party, during this time.
- English is very widely spoken by Danes, and with high levels of proficiency.

#### **Cultural Considerations**

 Danish workplaces are typically informal, with a flat hierarchy. People are trusted to manage their own workloads and time, with minimal supervision.

- It's usual for groups of co-workers to take their lunch together, but socialising with colleagues outside of work hours is rare.
- Work-life balance is highly prioritised.
   Denmark ranks 3rd on OECD's scale of countries with the best balance. This is partly down to flexible working hours and outstanding social and welfare support.

"Denmark's data privacy market, though smaller in comparison to its European neighbours, is dynamic, with a stable demand for professionals skilled in GDPR compliance, particularly at the entry to mid-level PQE. The Danish market's competitive nature highlights the importance of an intensive search strategy to identify and attract top talent."

Phil Redhead Leonid Group

### SALARY GUIDE DENMARK

TITLE	SALARY RANGE (DKK)
Privacy Engineer	600,000 DKK - 1,050,000
Senior Data Protection Manager	750,000 DKK - 1,300,000
Privacy Counsel	700,000 DKK - 1,4500,000
Data Privacy Officer	900,000 DKK - 1,470,000
Chief Privacy Officer	1,000,000 DKK - 1.700,000

# **UNITED ARAB EMIRATES**

The United Arab Emirates (or UAE) is an economic powerhouse of the Middle East and is widely known as a business–friendly country in the region that welcomes foreign workers and investments. And since around 89% of the population originates from outside the UAE, it's also a great place to look for remote talent as it's one of a growing number of countries now offering digital nomad visas.

The UAE's economy is the 5th largest in the Middle East, with a gross domestic product of US\$501 billion (AED 1.84 trillion) in 2022.

The economy in the UAE relies on revenue from the natural gas and petroleum industries. One of its bigger non-oil revenue sources is tourism, and the UAE's thriving services sector is contributing to the diversification of the economy. Across the nation, there is currently \$350 billion worth of active construction in process.

Ease of doing business ranking = 16

"The UAE's data privacy sector is maturing, driven by its diversified economy and the increasing presence of international businesses. The introduction of specific data protection laws in Dubai's International Financial Centre and Abu Dhabi's Global Market has heightened the need for expertise in compliance, making the UAE a prominent market for data privacy professionals."

Phil Redhead Leonid Group

CAPITAL	Abu Dhabi
LANGUAGES SPOKEN	Arabic, English
POPULATION	9.89 million
PAYROLL	Monthly or Bi-Weekly
CURRENCY	United Aram Emirates Dirham (AED)
VAT	5%



- The UAE does not have any enforced federal income tax legislation for general business.
   Each Emirate has enacted an income tax decree, but enforcement is restricted to oil companies and foreign banks.
- According to the terms of the UAE
   Labour Law, introduced in February 2022,
   companies operating in the private sector
   are required to employ individuals on fixed term contracts. However, the fixed-term
   aspect of the agreement is, in practice,
   insignificant. For instance, even if a five-year
   term is agreed upon, it essentially functions
   as a permanent employment contract and
   can be terminated with notice by either party.
- The working week used to be Sunday to Thursday, but it has recently changed to Monday to Friday.
- Usual business hours are from 8am to 1pm, resuming at 4pm (once temperatures have reduced) and continuing until 7pm.
- It is compulsory to register employees with the national government pension programme and contribute to it regularly.
- Compensation packages are structured differently; instead of the usual base salary
   bonus, firms typically offer base salary
   housing allowance + transportation
  - allowance (and schooling allowance, if the employee has children).

### **Cultural Considerations**

- Islam is the cornerstone of UAE culture and profoundly influences its business practices. Most Emiratis are Muslim, so expats would do well to familiarise themselves with the principles of Islam to help cultivate relationships, and avoid inadvertently offending anyone.
- Islamic principles, such as honesty, integrity, and fairness, underscore all aspects of business dealings. Upholding one's word and delivering on promises are highly valued traits that contribute to building trust and lasting partnerships in the UAE.
- Religious holidays have a significant impact on business operations in the UAE. For instance, during Ramadan — a month of fasting from dawn to sunset — working hours are reduced, and the pace of business may slow down. Many companies operate with shorter business hours to allow employees to break their fasts and engage in prayers.
- Traditional hierarchical structures are prevalent in organisations, with clear lines of authority. Decision-making processes often involve higher-level management, and their input carries significant weight in final outcomes.

### **SALARY GUIDE UAE**

TITLE	SALARY RANGE (AED)
Privacy Engineer	AED 350,000 - 500,000
Senior Data Protection Manager	AED 367,000 - 500,000
Privacy Counsel	AED 400,000 - 740,000
Data Privacy Officer	AED 350,000 - 600,000
Chief Privacy Officer	AED 700,000 AED - 1,200,000



# 2.3 ASIA-PACIFIC - SUMMARY

As the region with arguably the greatest diversity in approaches to data privacy and cybersecurity regulation, APAC continues to undergo significant transformation.

2023 was the year **Vietnam's** Personal Data Protection Law came into force and India adopted its Digital Personal Data Protection Act. In October 2024, **Indonesia** is set to undergo a pivotal transformation with the commencement of the enforcement of its Personal Data Protection. **Singapore's** Personal Data Protection Commission (PDPC) issued revised advisory guidelines on consent in January 2024. These guidelines emphasize the need for clear, specific, and informed consent from individuals for data collection and processing.

Earlier this year, **China** set up pilot schemes for data security assessments in free trade zones. These programmes aim to test and refine data security measures within specific geographic areas before potentially rolling them out nationwide.

With a sharpened focus on data security and growing consumer awareness, more governments are now waking up the urgent need to enact and refine data protection laws.

However, there is presently little commonality between the various jurisdictions in Asia, which makes regional compliance both timeconsuming and resource intensive, especially given that many Asian businesses operate across multiple territories. In addition, moves to harmonise and improve data protection laws across the region have been hampered by international developments such as the Max Schrems case, the new EU Data Privacy Regulations and issues surrounding Safe Harbour Agreement vs Privacy Shield.

Hong Kong, for example, was due to implement restrictions on cross-border data transfers, but these plans are now on hold while it waits to see what happens in Europe.

Further, there has generally been a lack of significant regulatory enforcement action, meaning legislation may not be as effective a deterrent as it could be.

With all these factors considered, one of the greatest challenges for Asian organisations is understanding which areas of data privacy legislation to prioritise in their compliance efforts.

To do this, an essential early step is a risk assessment; looking at which countries have the highest customer numbers, where suppliers are based, which jurisdictions impose the heaviest penalties....and then weigh all of this against business objectives.

# **SINGAPORE**

Singapore has a successful free-market economy and consistently ranks among the least corrupt nations in the world. Unemployment is low, and its port is one of the busiest in the world.

Singapore's workforce is highly multicultural, comprising Chinese, Malay, and Indian workers, as well as expatriates from around the globe. While the government has taken steps to reduce the country's reliance on foreign labour, particularly in unskilled roles, Singapore remains an open and diverse society.

Ease of doing business ranking = 2

CAPITAL	Singapore
LANGUAGES SPOKEN	English, Bahasa Malaysia, Mandarin & Tamil
POPULATION	5.686 million
PAYROLL	Monthly
CURRENCY	Singapore Dollar (SGD)
VAT	7%



- The Employment Act specifies that all employees are entitled to one rest day out of the week. Typically, this is Sunday, but employers can choose a different rest day as long as they inform their employees.
- Employers typically provide a 13th-month bonus to their employees. 13th-month bonus is also known as Annual Wage Supplement (AWS). It is a single annual payment on top of an employee's total annual wage. AWS is not compulsory. Employers are encouraged to give their employees AWS to reward them for contributing to the company's performance.
- **Cultural Considerations**
- Singapore places importance on proper business etiquette and protocol. Handshakes are common as a form of greeting, and it is polite to address individuals using their titles and surnames, especially in formal settings.

- It is also customary to exchange business cards during introductions, with proper attention given to receiving and presenting them with both hands.
- Teamwork and collaboration are highly valued in Singapore's work culture.
   Employees are expected to work well in teams and contribute to collective goals.
   Communication tends to be polite, indirect and harmonious, with an emphasis on maintaining positive relationships.

"As a key legal hub for the Asia-Pacific region, Singapore boasts a vibrant data privacy market. The Personal Data Protection Act (PDPA), alongside sector-specific regulations, drives demand for skilled professionals. Singapore's strategic location and business-friendly environment attract talent from across the globe, making it a competitive market for data privacy expertise."

Phil Redhead Leonid Group

#### **SALARY GUIDE SINGAPORE**

TITLE	SALARY RANGE (SGD)
Privacy Engineer	S\$117,000 - S\$169,000
Senior Data Protection Manager	S\$143,000 - S\$195,000
Privacy Counsel	S\$195,000 - S\$286,000
Data Protection Officer	S\$182,000 - S\$260,000
Chief Privacy Officer	S\$280,000 - S\$400,000+

# **JAPAN**

Japan is smaller than the U.S. state of California, and yet it boasts the world's third-largest economy, after the United States and China. It is home to 62 of the Fortune 500 companies and excels in the IT, automotive and healthcare sectors.

Japan is a stable place to do business and a sensible stepping stone into other Asian territories.

It is, however, one of the more challenging environments in which to attract job candidates. An aging population and declining birth rates has led to a serious labour shortage in the country. This means employees are used to excellent job security and, when they are looking for a job, receiving job offers from multiple companies.

Ease of doing business ranking = 29

"Japan's Act on the Protection of Personal Information (APPI) necessitates a high level of data privacy compliance among businesses. The Japanese market is unique, with a preference for building networks and recommendations over direct job applications. The demand for data privacy professionals is met with a search strategy that emphasizes understanding local business culture and practices.."

Phil Redhead Leonid Group

CAPITAL	Tokyo	
LANGUAGES SPOKEN	Japanese	
POPULATION	125.7 million	
PAYROLL	Monthly	
CURRENCY	Japanese Yen (JPY)	
VAT	10%	



- Employees in managerial positions are generally expected to work unpaid overtime.
- Termination of employment can be difficult in Japan and employers will generally seek to obtain the employee's resignation before handing out a termination notice. In some cases, financial incentives can be offered to encourage employees to resign.
- The notice period for resigning employees can range from two weeks to a month. In the case of dismissals, the employer must provide 30 days' notice or payment in lieu of the notice period.
- There is no payment for sick leave in Japan. For short-term cases, employees use their paid vacation to take leaves of absence.
- Employers are required to grant annual paid leave of at least 10 days upon completion of 6 months' employment. The entitlement increases by 1 day per year for the following 2 years and by 2 days per year thereafter, up to a maximum of 20 days per year.

#### **Cultural Considerations**

- Japanese employers expect unwavering dedication from their teams. And while there have been notable improvements in Japanese work conditions in recent years, Japan still carries its reputation of being a hard working country.
- Japanese 'nomikai' are company after-work drinking parties, which are often compulsory to attend. It is seen as disrespectful to refuse such an invitation from a senior employee.
- Career progression rewards behaviour which demonstrates team effort, for example by singing the company song, not taking all of one's vacation days, and sharing credit for accomplishments with the team.
- Non-verbal communication, such as facial expressions and body language, is heavily relied upon in Japanese workplaces.

#### **SALARY GUIDE JAPAN**

TITLE	SALARY RANGE (JPY)
Privacy Engineer	¥6,000,000 - ¥12,000,000
Senior Data Protection Manager	¥9,600,000 - ¥18,000,000
Privacy Counsel	¥12,000,000 - ¥24,000,000
Data Privacy Officer	¥9,600,000 - ¥20,400,000
Chief Privacy Officer	¥24,912,000 - ¥54,000,000

# **HONG KONG**

Hong Kong is a special administrative region of China, located just off the Southeastern coast.

For a territory of less than eight million, Hong Kong boasts a vibrant economy with strengths in financial services, tourism and professional services. It acts as an excellent gateway to the Asia-Pacific market.

Combined with its 4th place ranking on the human development index and a GDP that is several times the size of comparative nations, Hong Kong offers an attractive option for companies looking to build a presence in Asia with strong global connections.

Hong Kong is uniquely positioned as a bilingual and multicultural society, with English and Chinese (Cantonese and Mandarin) being widely spoken. This linguistic diversity is a valuable asset for businesses looking to engage with both local and international stakeholders.

"Hong Kong's data privacy landscape is well-established, guided by the Personal Data (Privacy) Ordinance (PDPO). With a mix of local and international companies, the demand for professionals who can manage cross-border data protection issues is high. Hong Kong remains a hub for legal talent with expertise in financial services, real estate, and tech, attracting professionals looking for dynamic career opportunities."

Phil Redhead Leonid Group

LANGUAGES SPOKEN	Chinese, English
POPULATION	7.5 million
PAYROLL	Monthly
CURRENCY	Hong Kong Dollar (HKD)
VAT	3—45%



- Hong Kong operates on a territorial tax system, meaning that only income generated within the city is subject to taxation. Income earned abroad, even if remitted to Hong Kong, is generally exempt from taxation.
- Income tax rates are progressive, and capped at 17%.
- Hong Kong does not have a comprehensive social security system. Instead, social welfare is largely provided through a mix of means-tested assistance programs, noncontributory benefits and voluntary savings schemes.
- The standard working week is 44 hours, across 5 days.
- Employees are entitled to 7 annual leave days; this can rise to 14 days depending on an individual's tenure with their employer.
- Bonus culture is deeply ingrained, particularly within the finance and professional services sectors, where yearend bonuses can significantly boost overall compensation packages.
- Many companies in Hong Kong provide employee stock options as part of their compensation packages, which prove successful in retaining talent.

#### **Cultural Considerations**

- Hong Kong's business culture is influenced by a mix of Eastern and Western practices.
   Hierarchy and respect for authority are very much adhered to.
- It is not uncommon for employees to work long hours, especially in the run up to a project deadline.
- Workplaces are typically quite formal and focused on efficiency and punctuality.
- Formal business attire is expected in most offices, although there is a growing trend towards a slightly more relaxed approach in smaller firms and start-ups.
- Being consistently late or missing deadlines is considered disrespectful.
- English is the main business language, although knowing some Mandarin, Cantonese or Japanese is very helpful.

### **SALARY GUIDE HONG KONG**

TITLE	SALARY RANGE (HKD)
Privacy Engineer	HK\$560,000 - 920,000
Senior Data Protection Manager	HK\$1,200,000 - 1,500,000
Privacy Counsel	HK\$1,450,000 - 1,700,000
Data Privacy Officer	HK\$1,000,000 - 1,600,000
Chief Privacy Officer	HK\$1,700,000 - 2,400,000



03.

# CONCLUSION

# 2024 is a transformative year for data privacy professionals, with multiple legislation changes and even more on the horizon.

As the industry evolves, so too does a data privacy career path. With questions remaining over responsibilities, job titles, team structure — there is no right or wrong answer but it's something which will be unique to each organisation, depending on where they operate and the nature of their business.

With the profession changing scope, demand rising and the talent pool diminishing, employers will benefit from partnering with an experienced data privacy search firm, in order to target sought-after 'passive' candidates who might not actively be looking.

At Leonid, we work globally and our consultants only handle a maximum of three roles at any time, to ensure we maximise our time in reaching out to our network and screening potential candidates.

Unlike other search firms, we pledge to fill all open roles within 30 days of instruction, using our 'Magic Month' methodology as well as saving you significant time in the process by utilising our unique LeonidLive shortlist platform.

To find out more about our methodology or for bespoke salary benchmarking, please get in touch with Phil Redhead for a friendly and informal discussion.





# CONTACT

Leonid is a leading, international recruiter in in-house legal and data privacy – and all areas of corporate governance.

If you are looking to bolster your team, we can proactively seek out the best candidates and have them ready to join you within 30 days of instruction.

To find out more about Leonid's service, please visit our website:

www.leonid-group.com

Or, to request a meeting with our Head of Data Privacy & Cyber Security, Phil Redhead, please email him directly: philip@leonid-group.com

You can also reach out via the

following methods:

T +44 20 3958 7484

E info@leonid-group.com

W www.leonid-group.com

### **LONDON**

Tintagel House, 92 Albert Embankment, London SE1 7TY

#### **BARCELONA**

Wojo – Poblenou, Carrer de Sancho de Ávila 65, Barcelona, 08018

#### **PARIS**

Wojo Paris, Rue de Calais, 75009 Paris