



# RHTLaw Vietnam

LEGAL UPDATE

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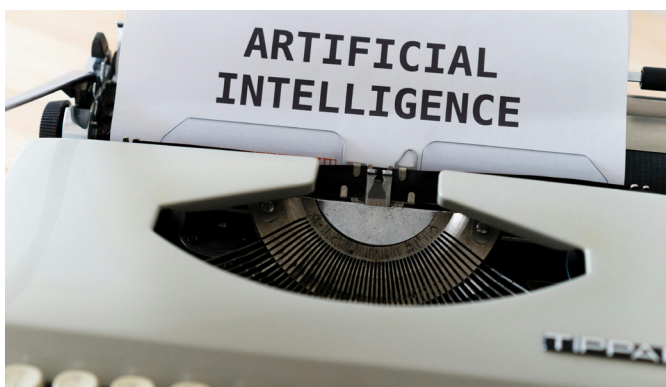
April 2026

## VIETNAM'S LAW ON ARTIFICIAL INTELLIGENCE 2025 A COMPREHENSIVE RISK-BASED FRAMEWORK

Artificial intelligence (AI) is increasingly adopted by enterprises across various sectors and embedded in daily life, raising legal concerns as AI-generated outputs may contain hallucinations that blur the line between real and artificial information. This creates potential risks to user trust, decision-making, and information integrity, and hence requires appropriate regulatory safeguards.

In response to this regulatory gap, Vietnam has enacted the Law on Artificial Intelligence No. 134/2025/QH15 ("AI Law"), adopted on 10 December 2025 and effective from 1 March 2026. This law has established, for the first time, a unified and comprehensive legal framework for AI governance in Vietnam.

This legal update highlights several key aspects of the new legal framework.



### Human-centric approach

The AI Law adopts a human-centric approach, making clear that AI is intended to support - not replace - human authority and responsibility. It requires maintaining human control over AI systems, including oversight and intervention in all AI-driven decisions and actions. It also prohibits the use of AI for deception and exploitation of vulnerable groups.

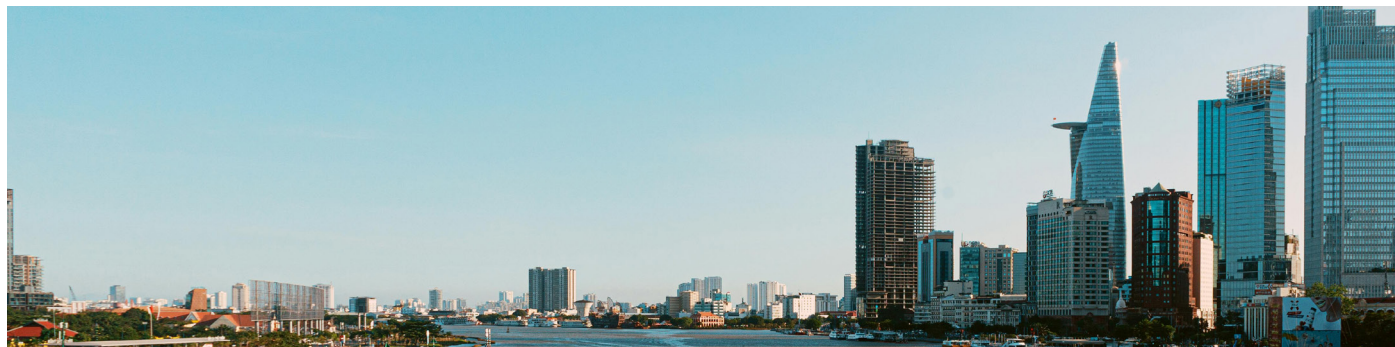
### Role-based approach

It is not difficult to see that many digital technologies operate across multiple sectors simultaneously. For example, an AI chatbot may be widely used in different industries with different roles, such as serving as a financial advisor in the banking sector or a customer support tool in e-commerce.

It is therefore evident that regulating by industry may not only render the regulatory process cumbersome but also fail to adequately capture cross-sector technologies due to regulatory gaps.

In this context, a role-based approach that focuses on the functions of each actor within the AI ecosystem may provide a more effective framework. In line with this approach, the AI Law classifies actors into the following roles: developers, providers, deployers, users, and affected persons.

*This material is only intended for general reading. Under no circumstances is it to be relied upon in substitution for specific advice on any issue(s) that may arise relating to its subject matter.*



## Transparency-driven obligations

Transparency is no longer an “option” - it is a legal requirement. Depending on its role as provider or deployer, the enterprise shall:

- ensure that users are aware of their interaction with AI systems;
- mark AI-generated audio, images, and videos in a machine-readable format;
- clearly disclose AI-generated or modified content that may mislead as to authenticity; and
- label AI-generated or modified contents simulating real persons or events to distinguish them from authentic contents.

Transparency must be maintained throughout the entire process of providing AI systems, products, or content to users.

## Risk-based classification

The providers may, before deployment, classify and categorize their AI systems according to their potential impacts on individuals, organizations, and society, and accordingly follow respective compliance obligations as summarized below. Further guidance on the AI system classification is expected to be provided in an upcoming Government decree.

	Risk level	Classification	Conformity assessment	Examination & monitoring
<b>High-risk AI system</b>	Systems that may cause <b>significant harm</b> to life, health, lawful rights and interests of organizations or individuals, national interests, public interests, or national security.	Providers, upon classifying their AI systems, must maintain the classification records and notify the classification results to the Ministry of Science and Technology (“ <b>MOST</b> ”).	<ul style="list-style-type: none"> <li>• Conformity assessment is required before deployment or in case of substantial modifications.</li> <li>• Such conformity assessment must also comply with relevant standards and technical regulations (if any).</li> </ul>	Examination & monitoring must be conducted periodically or upon signs of violations.
<b>Medium-risk AI system</b>	Systems that may <b>mislead, influence, or manipulate</b> users because users may be unable to identify that they are interacting with an AI system.		Not required	Examination and monitoring may be conducted through reporting, sample inspections, or assessment by independent organizations.
<b>Low-risk AI system</b>	Systems that do <b>not fall</b> under the high-risk or medium-risk categories.	Providers, upon classifying their AI systems, are encouraged to publish basic information for transparency.	Not required	Examination and monitoring may be conducted in the event of incidents, complaints, or where necessary to ensure safety.

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