



Policy

EMPLOYEE PERSONAL DATA PROTECTION

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RECORD OF CHANGES

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EMPLOYEE PERSONAL DATA PROTECTION POLICY

Article 1. Subject and Scope

This policy on personal data protection of employees ("Policy") is implemented by [FPT Software Company, Ltd.] ("FPT Software", "Company"), describing activities related to protecting and processing personal data of employees so that employees have a better understanding of the purpose, scope of information that the Company processes, and measures the Company applies to protect information and the privacy of employees during the recruitment process and working period at the Company.

This policy is an inseparable part of the labor contract, labor regulations, agreements, and other commitments between the Company and its employees.

Article 2. Terminology

- 2.1. **"FPT Software"** or **"Company"** is understood as [*FPT Software Company, Ltd. and its member companies according to governance standards*].
- 2.2. **"Employee"** is understood as an officer or employee who signs a labor contract, probationary contract, apprenticeship/apprenticeship contract, contract, and other working agreements with Companies, and individuals who apply for vacancies at the Company.
- 2.3. **"Personal data"** is information in the form of symbols, letters, numbers, images, sounds or similar forms in the electronic environment that is associated with a specific person or helps identify a specific person. Personal data includes basic personal data and sensitive personal data.
- 2.4. **"Personal data protection"** is the activity of preventing, detecting, terminating, and handling violations related to personal data according to the provisions of law.
- 2.5. **"Personal data processing"** is one or more activities affecting personal data, such as: collecting, recording, analyzing, confirming, storing, editing, disclosing, combining, accessing, export, retrieve, encrypt, decrypt, copy, share, transmit, provide, transfer, delete, destroy personal data or other related actions.

Article 3: Type of Personal Data processed

3.1 The company collect and process the following types of personal information from employees:

- (a) Surname, middle name, birth name, other names (if any); Date of birth; Sex;
- (b) Place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown, contact address; Nationality;
- (c) Employee code; Personal email address; Digital account information for internal use;
- (d) Phone number, ID card number, personal identification number, passport number, driver's license number, license plate number, personal tax code number, social insurance number, insurance card number medical insurance;
- (e) Marital status; Information about family relationships (parents, children, spouses); Dependent information; information about related persons according to enterprise and securities laws;
- (f) Professional qualifications, degrees, certificates, foreign language proficiency;

- (g) Working department, workplace, title, concurrent duties (if any), staff level;
- (h) Images of individuals, including images of employees provided when applying for work, images of employees posted on the Company's internal channels during the work process, images of employees collected during the process of participating in workplace activities or events organized by the Company;
- (i) Work history shown in the employee's profile; Records of rewards and discipline; Participating organizations and associations; Date of starting work; Date of receipt of decision on job transfer or position change;
- (j) Timekeeping records; Job evaluation information, salary increase and decrease proposal history, working time history, disciplinary and grievance procedures (in the process of monitoring compliance and enforcing Company policies);
- (k) Computer usage information: behavior and habits of using computers allocated by the Company, including websites that employees access;
- (l) Information collected in application interviews or in internal surveys or in internal exams, tests, tests, and training; Background information, history of violations, workplace discipline or violations of the law (if any);
- (m) Other information arising during the process of working at the Company that is associated with employees or helps identify specific employees who do not fall into the above cases;
- (n) Bank account information; income information and tax withholding information from dependents; salary information and benefits provided by the Company; Health status and social benefits; Information about physical limitations and special needs in the workplace for the purpose of providing the most suitable working conditions; Location data such as Company vehicle location, employee working location.
- (o) The Company may also collect other information that employees provide during the course of employment, such as race or ethnicity, medical information, genetics, biometrics, fingerprints, religious beliefs and philosophy, sex life, sexual orientation of individuals, other sexual orientations prescribed by law are specific and require necessary security measures.

3.2 Employees can also provide information about other people, such as employees' dependents and families, so that the Company can provide relevant benefits or contact them in case of need. Before employees provide information to the company about other people, employees must inform them of the information they intend to provide to the company. If employees share their information with the Company, they may also need to read this Policy.

Article 4: Processing purpose

- 4.1. Company collects and processes employees' personal data to serve legal purposes or other needs, including the following purposes:
 - a) Serving the production, business, management and operations of the Company and its affiliated member companies according to management standards;
 - b) Other activities aimed at bringing welfare/benefits to employees
 - c) The company needs to fulfill a number of obligations according to the provisions of law; legal requests of competent state authorities,
- 4.2. When a company collects information to serve a legitimate interest, that interest is typically for the company to attract and hire qualified workers, prevent fraud, and/or for administrative purposes. company's business. This plays a very important role in helping the company meet customer

requirements and other business needs. The company will not collect or provide personal information of employees if it affects the employees' basic interests or rights

- 4.3. In some cases, employees may request the company to provide their information to another party for a special reason, and the company will comply with the employee's request on behalf of the employee

Article 5: Processing Organization

- 5.1. FPT Joint Stock Company. Head office at FPT Tower, No. 10 Pham Van Bach, Dich Vong Ward, Cau Giay District, City. Hanoi Vietnam.
- 5.2. Company may share or jointly process personal data with the following organizations and individuals:
 - a) The Company's human resources and management departments, in addition to other departments and divisions, need to use employee information according to operational functions, or decisions of the Board of Management.
 - b) Company and member companies under FPT Software according to management standards.
 - c) Customers, partners, suppliers, contractors, agents when required by the Company (for example, to perform a contract with a customer, and meet the confidentiality requirements of that contract.
 - d) Professional advisors of the Company such as auditors, lawyers, investors, etc. according to the provisions of law.
 - e) Courts and competent state agencies in accordance with the provisions of law and/or when required and permitted by law.

The Company commits to sharing or co-processing personal data only in cases where it is necessary to fulfill the purposes stated in Article 4 of this Policy or as prescribed by law. Organizations and individuals that receive personal data of employees who are or have worked for the Company will have to comply with the provisions of this Policy and the provisions of law on the protection of related personal data.

- 5.3. In case of participation of personal data processing organizations other than the organizations/individuals mentioned in Article 5.2, the Company will notify and confirm employees' consent through internal methods in advance when conducting.

Article 6: Processing Method

- 6.1. The company can collect personal information of employees from many sources, but mainly directly from employees. Employees will often provide this information directly to the employee's manager or human resources department. The Company also collects personal information of employees from managers, human resources or employees' colleagues (for example, comments from managers). The Company may collect personal information from previous employers, tax authorities, service providers, or when the Company hires another party to perform a background check before signing an apprenticeship contract, service contract, probationary contract, labor contract or other contract.
- 6.2. The Company applies one or more activities affecting personal data such as: collection, recording, analysis, confirmation, storage, correction, disclosure, combination, access, retrieval, recall, encrypt, decrypt, copy, share, transmit, provide, transfer, delete, destroy personal data or other related actions on the basis of compliance with the purpose and principles of data processing documents specified in this Policy

Article 7: Data Storage & Unintended Consequences

- 7.1 The Company will only store employee data for the necessary period decided by FPT Software to ensure the implementation of the above purposes, or as prescribed by law.
- ✓ For PD stored as hard copy records: Normally, this time limit is the period of time the employee works at the company plus a period of time after the employee finishes working at the company, for use in case there is a legal requirement that the employee or company needs relevant information. The specific period for the company to store employee information will depend on the type of information involved.
 - ✓ For electronic PD: Store on the internal system for management purposes and use in case of need.
- 7.2 Although the Company will make every effort to ensure that employee information is anonymized/encrypted, the risk that this data may be disclosed in some unusual circumstances cannot be completely excluded. Some unwanted consequences and damages that may occur include (but are not limited to):
- ✓ Hardware and software errors during data processing cause loss of employee data;
 - ✓ Security breaches are beyond the Company's control, related systems are attacked by hackers, causing data to be leaked;
 - ✓ Employees self-disclose or leak personal data due to: carelessness or fraud; visit websites/download applications containing malware...

Article 8: Rights and Obligations of Employees

Employees have the following rights:

- 8.1. Employees have the right to consent or object to data processing of their own personal data, unless the law provides otherwise.
- 8.2. Employees have other rights according to current laws to protect their personal data,
- 8.3. Method of exercising rights: in writing sent to the Company's human resources department or by contacting a specialized human resources officer by internal means

Employees have the following obligations:

- 8.4. Protect your personal data, including but not limited to information related to login passwords to employee accounts at the company, and implementing information security measures such as preservation of electronic devices during utilizing; lock, log out, or exit your account on FPT Software's website or application when not in use; and implement other security measures.
- 8.5. Regularly update the Company's personal data protection regulations and policies. Comply with the Company's regulations and procedures on personal data protection.
- 8.6. Comply with the provisions of law and the Company's regulations and instructions related to handling employee personal data.

Article 9: General Terms

- 9.1. Through signing an apprenticeship contract, internship contract, probationary contract, service contract and/or labor contract with the company, employees confirm their agreement with this Policy. In addition, in some cases the company may require employees to provide additional consent for the collecting and use of certain other types of information. The reason for collecting and use will be notified to employees at the time the company requests employee consent. The company does not force employees to agree to any of the company's requests.
- 9.2. Employees clearly know and agree that this Policy is also the Notice of Personal Data Processing specified in Article 13 of Decree 13/ND-CP/2023 and amended and supplemented from time to

time before the Company Carry out Processing of personal data. Accordingly, the Company does not need to take any additional measures for the purpose of notifying employees of personal data processing.

- 9.3. The Company may amend or update this Policy at any time. In case the Company modifies or updates, the Company will notify employees.
- 9.4. Employees have carefully read, understood the rights and obligations and agreed with the entire content of this Policy.

FPT SOFTWARE COMPANY LIMITED