



Policy

PERSONAL DATA PRIVACY

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RECORD OF CHANGES

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PERSONAL DATA PRIVACY POLICY

This personal data privacy policy (“Policy”) implemented by [FPT Software Company, Ltd.] (“**FPT Software**”, “**Company**”), describes the activities related to the processing of personal data of Customers so that Customers can better understand the purpose and scope of information that FPT Software processes, the measures FPT Software applies to protect information and Customers' rights regarding these activities.

This policy is an inseparable part of the contracts, agreements, terms and conditions that bind the relationship between FPT Software and Customers.

Article 1. Subjects and scope of application

This policy governs the way in which FPT Software collects, processes and stores personal data of customers using or interacting with FPT Software products, websites or services; and/or related persons of Customers according to relationships required to be collected by law; and/or co-own and use FPT Software products/services.

For the avoidance of doubt, this Data Privacy Policy applies to individual Customers only. FPT Software encourages Customers to read this Policy carefully and regularly check the website to update any changes that FPT Software may make according to the terms of the Policy.

Article 2. Terminology

- 2.1. “**Customer**” is an individual who accesses, learns about, registers, uses or is involved in the operating process and providing of FPT Software products and services.
- 2.2. “**FPT Group**” includes FPT Software and its member companies according to governance standards.
- 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.
- 2.6. “**Third party**” is an organization or individual other than FPT Software and the Customer as explained in accordance with this Policy.

For further clarity, any terms not explained in this Article will be understood and applied according to Vietnamese law.

Article 3. Purpose of processing Customer's personal data

3.1. FPT Software may process customers' personal data for one or more of the following purposes:

- a) Respond to Customer service requests and support needs
- b) Verify identity and ensure confidentiality of Customer's personal information
- c) Provide the requested products or services of the Company; or of partners/suppliers that FPT Software acts as agent/cooperates with to provide products and services to Customers;
- d) Adjust, update, secure and improve products, services, applications and devices that FPT Software or members of the FPT Software are providing to Customers
- e) Notify Customers about changes to policies and promotions of products and services that the Company or members of FPT Software are providing;
- f) Measure, analyze internal data and other processing to improve and enhance the quality of services/products of the Company or members of FPT Software or carry out marketing communication activities;
- g) Prevent and prevent fraud, identity theft and other illegal activities;
- h) To have a basis for establishing and exercising legal rights or defending legal claims of FPT Software, Customers or any individual. These purposes may include exchanging data with other companies and organizations to prevent and detect fraud and reduce credit risk;
- i) Comply with current laws, relevant industry standards and other applicable policies of the Company;
- j) Any other purpose specific to the Company's operations.

3.2. FPT Software will request the Customer's permission before using the Customer's personal data for any purpose other than the purposes stated in Article 3.1 above at the time of collecting the Customer's personal data, or before commencing the relevant processing or as otherwise required or permitted by applicable law.

Article 4. Security of customer personal data

4.1. Customers' personal data is committed to maximum confidentiality according to FPT Software regulations and the law. The processing of each Customer's Personal Data is only carried out with the Customer's consent, unless otherwise provided by law.

- 4.2. FPT Software does not use, transfer, provide or share with any third-party Customer's personal data without the Customer's consent, unless otherwise prescribed by law.
- 4.3. FPT Software will comply with other personal data security principles according to current legal regulations.

Article 5. Types of personal data that FPT Software collects and processes

In order for FPT Software to provide products and services to Customers and/or process Customer requests, FPT Software has the right to collect and/or request to collect the following types of personal data:

5.1 Basic personal data of the Customer and related individuals of the Customer include:

- a) Surname, middle name, birth name, other names (if any);
- b) Date, month and year of birth; date, month, year of death or disappearance;
- c) Gender;
- d) Place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown, contact address;
- e) Nationality;
- f) Image of the individual;
- g) 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;
- h) Marital status;
- i) Information about family relationships (parents, children);
- j) Information about individuals' digital accounts; Personal data reflecting activities and history of activities in cyberspace;
- k) Other information that pertains to a specific person or helps to identify a specific person that is not part of additional personal data;
- l) Other data according to current legal regulations.

5.2 Additional personal data relevant to Customer privacy includes:

- a) Information about inherited or acquired genetic characteristics of individuals;
- b) Information about the individual's physical attributes and biological characteristics;
- c) Information about the individual's sex life and sexual orientation;
- d) Data on crimes and criminal acts collected and stored by law enforcement agencies;
- e) Customer information of credit institutions, foreign bank branches, payment intermediary service providers, and other licensed organizations, including: customer identification information according to the provisions of law law, account information, deposit information, deposited asset information, transaction information, information

- about organizations and individuals that are guarantors at credit institutions, bank branches, organizations providing intermediary payment services;
- f) Data on the individual's location determined through location services;
 - g) Other personal data specified by law are special and require necessary security measures.

FPT Software absolutely does not collect personal data related to customers' religion or political opinions

- 5.3 Other information of the Customer and relevant individuals of the Customer that are necessary during the process of the Customer using FPT Software 's services;
- 5.4 Data related to websites or applications: technical data (as stated above, including device type, operating system, browser type, browser settings, IP address, set language, date and time of connection to the website, application usage statistics, application installations, date and time of connection to the application, location data and other technical communications); secure login details; usage data,...
- 5.5 Marketing data: advertising concerns; cookie data; clickstream data; browsing history; response to direct marketing; and opt out of direct marketing.

Article 6. Methods of collecting personal data

FPT Software collects personal data from Customers in the following approaches:

6.1. Directly from Customers in different ways:

- a) When the Customer signs a contract, purchases or uses third-party services through FPT Software or at FPT Software transaction points and business establishments;
- b) When the Customer submits a registration request or any other form related to FPT Software products and services;
- c) When the Customer interacts with the Company's customer service staff, for example through phone calls, letters, face-to-face meetings, emails or interactions on social networks;
- d) When Customers use some services of FPT Software, such as websites and applications including establishing online accounts with FPT Software;
- e) When Customers are contacted and respond to FPT Software marketing representatives and customer service staff;
- f) When Customers submit their personal information to the Company for any other reason, including when Customers sign up for a free trial of any products and services or when Customers express interested in any of the Company's products and services

6.2. From other third parties:

- a) If the Customer interacts with third party content or advertisements on websites or in applications, the Company may receive the Customer's personal information from the relevant third party, according to the policy of that third party's legally applicable privacy policy.
- b) If Customers choose to pay electronically directly to FPT Software or through websites or applications, FPT Software may receive Customer's personal data from third parties, such as payment service providers for the purpose of such payment.
- c) To comply with its obligations under applicable law, FPT Software may receive personal data about Customers from legal agencies and public authorities in accordance with the law.
- d) FPT Software may receive personal data about Customers from public sources (such as phone books, advertising information/flyers, information published on electronic news sites, etc.).
- e) Whenever collecting such personal data, FPT Software will ensure receipt of data from relevant third parties in lawful ways, and hold such third parties responsible for compliance. Comply with legal regulations on personal data protection.

Article 7. Measures to Process Data

FPT Software applies one or more activities affecting personal data such as: collection, recording, analysis, confirmation, storage, editing, disclosure, combination, access, retrieval, recall, encryption encrypt, decrypt, copy, share, transmit, provide, transfer, delete, destroy personal data or other related actions.

Article 8. Organizations to Process Personal Data

8.1. FPT Joint Stock Company

8.2. FPT Software will share or jointly process personal data with the following organizations and individuals:

- a) FPT Software, Member companies and affiliated companies of FPT Software
- b) Member companies that FPT Software directly or indirectly owns
- c) FPT Software 's contractors, agents, partners, and operational service providers.
- d) Branches, business units and employees working at branches, business units and agents of FPT Software.
- e) Telecommunications businesses in case the Customer violates the obligation to pay service fees.
- f) Commercial stores and retailers involved in implementing FPT Software 's promotional programs.
- g) FPT Software s professional advisors such as auditors, lawyers, etc. according to the provisions of law.
- h) Courts and competent state agencies in accordance with the provisions of law and/or when required and permitted by law

8.3. FPT Software commits to sharing or jointly processing personal data only in cases where it is necessary to carry out the Processing Purposes stated in this Policy or as prescribed by law. Organizations and individuals that receive Customer's personal data will have to comply with the provisions of this Policy and relevant legal regulations on personal data protection.

Although FPT Software will make every effort to ensure that Customer information is anonymized/encrypted, the risk that this data may be disclosed in some cases cannot be completely excluded.

8.4. In case of participation of other personal data processing organizations mentioned in this Article, FPT Software will notify the Customer before implementation

Article 9. Processing of personal data in special cases

FPT Software ensures that the processing of Customer's personal data fully meets the requirements of the Law in the following special cases:

9.1 Surveillance camera footage, in specific cases, can also be used for the following purposes:

- (a) for quality assurance purposes;
- (b) for public security and occupational safety purposes;
- (c) detect and prevent suspicious, inappropriate or unauthorized uses of the Company's facilities, products, services and/or facilities;
- (d) detect and prevent criminal conduct; and/or
- (e) conduct investigations of incidents.

9.2 FPT Software always respects and protects children's personal data. In addition to the personal data protection measures prescribed by law, before processing children's personal data, the Company will verify the child's age and request the consent of (i) children and/or (ii) the children's father, mother or guardian as prescribed by law.

9.3 In addition to complying with other relevant legal regulations, for the processing of personal data related to personal data of people declared missing/deceased, the Company will have to obtain approval from one of the relevant persons according to the provisions of current law.

Article 10. Customer's rights and obligations related to personal data provided to FPT Software

10.1 Customers have the right to know about the processing of their personal data, unless otherwise provided by law.

- a) Customers can agree or not agree to the processing of their personal data, unless otherwise prescribed by law.
- b) Customers have other rights according to current laws to protect their personal data.

10.2 Customer Obligations

- c) Protect your personal data during the process of using FPT Software 's services, including but not limited to information related to the login password to log into the Customer's account, OTP code; and implement information security measures such as preserving electronic devices during use; Lock, log out, or exit your account on FPT Software 's website or Application when not in use; and implement other security measures
- d) Regularly update FPT Software 's Regulations and Policies from time to time as notified to Customers or posted on FPT Software 's websites and other transaction channels.
- e) Comply with laws, regulations, and instructions of FPT Software related to processing Customer's personal data.

Article 11. Storage of personal data

FPT Software commits to only storing Customer personal data in cases related to the purposes stated in this Policy. Data storage time will be decided by FPT Software to ensure the above purposes are met.

Article 12. Unwanted consequences and damage may occur

Currently, FPT Software has not seen any unwanted consequences or damages that may occur. FPT Software will notify if a specific case occurs. During the process of processing personal data, personal data may be exposed due to:

- a) From the customer's side: Customers reveal or leak personal data due to: carelessness or fraud; accessing websites/downloading applications containing malware, etc. Customers should take note of taking measures to proactively protect their data.
- b) From FPT Software 's side: FPT Software commits to using information security technologies to protect Customer's personal data. However, no data can be 100% secured. Hardware and software errors may occur during data processing, causing loss of Customer data; or security holes are beyond FPT Software 's control, the relevant system is attacked by hackers, causing data leakage, etc.

Article 13. Processing of personal data involving foreign elements

- 13.1 For the purpose of processing personal data in this Policy, FPT Software may have to provide/share Customer's personal data to relevant third parties of FPT Software and these third parties may in Vietnam or any other location outside the territory of Vietnam.
- 13.2 When providing/sharing personal data abroad, FPT Software will require the receiving party to ensure that the Customer's personal data transferred to them will be confidential and secure. FPT Software ensures compliance with legal and regulatory obligations regarding the transfer of Customer personal data

- 13.3 Customers in the European Union (EU): Customers' personal data may be accessed, transferred and/or stored outside the European Economic Area (EEA), including countries may have a lower level of data protection under EU data protection law. FPT Software must comply with specific rules when transferring Personal Data from within the EEA to outside the EEA. FPT Software will then use appropriate safeguards to protect any Personal Data transferred.

Article 14. Contact information for processing personal data

In case customers have any questions regarding this Policy or issues related to data subject rights or the processing of your personal data, they may use the following forms:

- (1) Send a letter to the Company at:

Michael Hering | Global Data Protection Officer, Director | FPT SOFTWARE

F-Town Building 3, Saigon Hi-Tech Park, Lot T2, D1 St., Tan Phu Ward, Thu Duc City, HCM City, Vietnam

Cell: +84 90 2606236 | Tel: +84 (8) 3 736 2323 | Fax: +84 (8) 3 736 3333

- (2) Send an email to:

Michael Hering | Global Data Protection Officer, Director | FPT SOFTWARE

Michael.hering@fpt.com

Article 15. General Terms

- 15.1 This policy takes effect from July 1, 2023. Customers understand and agree that this Policy may be amended from time to time and will be notified to Customers through FPT Software 's transaction channels before application. Changes and their effective date will be updated and announced at FPT Software 's transaction channels and other channels. The Customer's continued use of the service after the notice period of amendments and supplements from time to time means that the Customer has accepted those amendments and supplements.
- 15.2. Customers 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 FPT Software carry out processing of personal data. Accordingly, FPT Software does not need to take any additional measures for the purpose of notifying Customers of personal data processing.
- 15.3. When receiving a request to exercise the Customer's rights under Article 9.1 from the requester, FPT Software will take the necessary steps to confirm and identify the requester before implementing the rights that the requester wants to apply. In case of necessity, in order to verify the identity and ensure the security of the Customer's personal data, FPT

Software may match the personal data provided by the requester when submitting a request to exercise rights with the Customer whose data has been being stored by FPT Software.

In case FPT Software deletes, destroys, or limits the use of data at the request of the Customer, the Customer's rights under the contract or service agreement signed with FPT Software require the use of personal data, may be interrupted, changed, or terminated.

15.4. Customers commit to strictly comply with the provisions of this Policy. For issues that have not been regulated, the Parties agree to comply with the provisions of law, instructions of competent State agencies and/or amendments and supplements to this Policy as notified by FPT Software to customers in each period.

15.5. Customers may see advertisements or other content on any website, application or device that may link to websites or services of partners, advertisers, sponsors, or other third parties.

FPT Software does not control the content or links appearing on third-party websites or services and is not responsible or/or liable for the practices used by those websites. Third party websites or services linked to or from any website, application or device. These websites and services may be subject to the third party's own privacy policies and terms of use.

15.6. This policy is concluded on the basis of goodwill between FPT Software and Customers. During the implementation process, if any disputes arise, the Parties will proactively resolve them through negotiation and conciliation. In case conciliation fails, the dispute will be brought to the competent People's Court for resolution according to the provisions of law.

FPT SOFTWARE COMPANY LIMITED