

## NOTICE ON PERSONAL DATA PROCESSING

First and foremost, transcosmos Vietnam Company Limited (“TCV”) would like to express our gratitude to our valued customers for your trust and continued support throughout our journey together.

TCV always respects privacy and endeavors to protect the Personal Data of our customers in compliance with the law. Pursuant to Decree No. 13/2023/ND-CP dated 17 April 2023 on personal data protection (as amended, supplemented, or replaced from time to time), TCV would like to inform our customers about the processing of Personal Data (“Notice”) with the following content:

### 1. General Terms

This Notice regulates and adjusts how TCV processes the personal data of customers.

The Notice also regulates and adjusts the way TCV processes the personal data of:

- Individuals related to customers that the law requires to be collected (“NLQ”);
- Other third parties as regulated by TCV from time to time: dependents, spouse, children, parents, authorized persons, emergency contacts, and other individuals (“Third Parties”).

By providing the personal data of NLQ and/or Third Parties to TCV, customers assure and guarantee that: (i) customer have obtained the consent of NLQ and/or Third Parties for the processing of personal data as specified in this Notice, (ii) customers bear full responsibility for TCV's processing of the personal data of NLQ and Third Parties that customers provides to TCV.

Within the scope of processing personal data as per this Notice, TCV acts as the Controller, Processor and/or both the Controller and Processor of Personal Data.

### 2. Definitions and Explanation of Terminologies

2.1. **“transcosmos Vietnam Company Limited”** or **“TCV”** includes: transcosmos Vietnam Company Limited, its branches, representative offices, business locations of transcosmos Vietnam Company Limited, and its subsidiaries, affiliated and associated companies of transcosmos Vietnam Company Limited.

2.2. **Notice on personal data processing (“Notice”)**: is the announcement regarding personal data processing that TCV provides to customers regarding the processing of customer's personal data at TCV.

2.3. **“Customer” (“KH”)**: refers to individuals who have used, are using, or will use products and

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services provided by TCV (including registered customers, users, those who make transactions, contracts, and potential customers that are searching for, approaching, and showing interest in products and services provided by TCV), who are also the subjects of the data.

2.4. **“Personal data”** refers to information in the form of symbols, written words, numbers, images, sounds, or similar formats in electronic environments, which is associated with a specific individual or helps identify a specific individual. Personal data includes basic personal data and sensitive personal data.

2.5. **“Basic personal data”** includes: First, middle, and last names, alternative names (if any); Date of birth; Date of death or disappearance; Gender; Place of birth, place of registration of birth, permanent residence, temporary residence, current residence, hometown, contact address; nationality; personal photo; phone number, ID card number, personal identification number, passport number, driver's license number, vehicle registration number, personal tax identification number, social insurance number, health insurance card number; marital status; family relationship information (parents, children); personal digital account details; personal data reflecting activities and history of online activities; Other information related to a specific individual or helping identify a specific individual not classified as sensitive personal data as mentioned in section 2.6 of this Notice.

2.6. **“Sensitive personal data”** refers to personal data closely tied to an individual's privacy and which, when breached, will directly affect the legitimate rights and interests of the individual, including: political view, religious belief; health status and personal information recorded in medical records, excluding blood type information; information related to racial and ethnic origin; information on inherited or acquired genetic characteristics; Information on physical attributes and unique biological characteristics; information on personal sexual life and sexual orientation; data on crimes and criminal behavior collected and stored by law enforcement agencies; customer data of credit institutions, foreign bank branches, intermediary payment service providers, and other authorized organizations, including: legally mandated customer identification information, account details, deposit information, collateral asset details, transaction details, data on organizations or individuals acting as guarantors at credit institutions, foreign bank branches, intermediary payment service providers; Location data identified through location services; Other personal data specified by the law as unique and requiring necessary security measures.

2.7. **“Personal Data Processing”** refers to one or multiple activities that impact personal data, such as: collecting, recording, analyzing, verifying, storing, editing, disclosing, combining, accessing, retrieving, recovering, encoding, decoding, copying, sharing, transmitting, providing, transferring, deleting, and erasing personal data or other related actions.

For clarity, any terms not explained in this Notice will be interpreted and applied according to Vietnamese law.

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### **3. Purposes of Personal Data Processing**

3.1. Customers' personal data will be utilized by TCV for one, several, or all of the following personal data processing purposes:

- Consulting, introducing TCV's products and services; presenting collaboration opportunities, job opportunities, and arranging contract and transaction agreements with TCV;
- Fulfilling rights and obligations according to contracts/agreements/deals between customers and TCV;
- Providing products or services that TCV proposed or provided to Customers; processing Customers' registration for any products and services offered or provided by TCV;
- Verifying the accuracy and completeness of the information provided by Customers; identifying or verifying the identity of Customers and implementing customer verification process;
- Contacting Customers to exchange relevant information and documents; informing Customers about benefits, changes in product and service features;
- Analyzing, evaluating, improving product and service quality, including researching and enhancing TCV's internal business processes; surveying and researching the market and analyzing data related to any TCV product or service (whether conducted by TCV or a third party in collaboration with TCV) that may concern customers;
- Carrying out customer care activities, commercial promotions, marketing, promoting TCV's image, internal and external communications, advertising; contacting customers to offer promotional programs, discounts, gifts, product introductions; organizing events for agents, management levels, other partners, and/or customers.
- Giving customers access to content on TCV's websites, apps, or social media platforms; offering technical support concerning TCV's websites and apps or about future changes to the policies in this Notice;
- Managing the use of TCV's websites, apps, and social media platforms by customers and conducting usage analytics to personalize, operate, assess, and improve them as well as TCV's services, and to understand customer preferences and troubleshoot issues;
- Fulfilling responsibilities and obligations of the parties as stipulated by the law, upon request from competent government agencies; serving the inspection and examination processes; the activities of competent government agencies and/or complying with other relevant legal regulations.
- Protecting the legitimate interests of TCV and to comply with relevant legal regulations; to prevent or mitigate threats to the safety and health of others, and the public interest.
- Complying with TCV's internal policies, procedures, and any rules, regulations, guidelines,

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directives, or requirements issued by a competent government agency as prescribed by the law.

- Checking with the anti-spam registration agency, junk email, junk calls, or other registration agencies (if any).
- Managing and recording calls and electronic communications with customers and other relevant parties.
- Implementing regulations related to the safety of TCV's information system and customer's personal data protection.
- Implementing and complying with agreements, contracts between TCV and partners, service providers, affiliates, and third parties related to TCV's business operations.
- Evaluating any repurchase requests, conducting repurchase transactions, transferring business operations and/or assets, transferring or assigning rights, benefits, or obligations under contracts between customers and TCV.
- Protecting and enforcing TCV's rights, including collecting fees, charges, and/or recovering any debts, as per any agreement between customers and TCV.
- Providing information to TCV's suppliers/service providers/partners to perform services for customers and/or TCV.
- Responding to customer questions and complaints and helping to resolve disputes.
- Serving any other purpose as required or permitted by any law, regulation, guideline, and/or competent government agency.
- Carrying out other activities related to TCV's provision, operation, processing, and management of products and services for customers.
- Serving purposes related to TCV's business activities that TCV deems appropriate at any given time.
- TCV may use customer's personal data recorded by the security surveillance system located at the headquarters, branches, offices, business locations, service delivery of TCV for the following purposes: (i) for public security and occupational safety purposes; (ii) to detect and prevent violations that may occur at TCV's business locations or in using TCV's products and services; (iii) to detect and prevent criminal activities; and/or (iv) to investigate other issues arising.
- Serving other reasonable purposes related to the above purposes.

3.2. TCV will seek permission from customers before using their personal data for purposes other than those stated in clause 3.1, section 3 of this notice.

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#### **4. Types of Personal Data Processed**

The types of Personal Data processed are related to the purposes stated in section 3 of this Notice, which include basic Personal Data and sensitive Personal Data.

#### **5. Method of Data Processing**

5.1. TCV (including the Data Processing Party used by TCV) may collect personal data of Customers either directly or indirectly through various means:

- Provided by Customers to TCV: (i) during the process where Customers search, exchange, approach, and use the products or services of TCV; (ii) during the process where Customers establish contractual relationships or partnerships with TCV in various ways such as directly, through agents, through intermediaries, via electronic information pages (websites), automated Q&A boxes (AI chatbox), brand promotion channels (fanpage), mobile applications, TCV's business software (collectively referred to as "Platforms"), by phone; (iii) when Customers register and use TCV's websites, applications, or social media platforms; (iv) when Customers participate in surveys, promotional programs, or other legal programs and activities of TCV; (v) through verbal or written exchanges between Customers and TCV and/or between Customers and organizations/agents authorized or in partnership with TCV;
- From suppliers, service providers, partners, affiliates, and third parties related to TCV's business operations;
- From third parties related to Customers, such as employees, joint account owners, guarantors, providers of security measures, and transaction parties;
- From third-party sources where Customers have agreed to the collection/sharing/provision of personal data, or from sources where collection is required or permitted by law.
- Customers agree that during transactions at TCV's business locations and/or through other communication channels such as TCV's hotline, electronic application exchanges, TCV will record images and/or voices of Customers for purposes as set out in section 3 of this Notice.
- TCV may also collect data through authorization by Customers and/or in accordance with legal regulations.

5.2. TCV and/or related parties that process personal data with the consent of Customers will perform data processing activities such as: collection, recording, analysis, verification, storage, modification, disclosure, combination, access, retrieval, revocation, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, annulment of personal data or other related actions as required by law for the purposes set out in section 3 of this Notice. The processing may be performed through computer systems, software, algorithms, in writing, verbally, or other appropriate methods.

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### 5.3. Personal Data Processing in Special Cases

TCV may record, film, and process personal data collected from CCTV cameras in areas equipped with CCTV (including but not limited to areas at customer service counters, corridors, entrances/exits within TCV's premises) in accordance with security requirements for TCV's operations and for Customers as prescribed by the law and this Notice.

- TCV always respects and protects the personal data of minors. In addition to the legal data protection measures, before processing minors' personal data, TCV will verify the age of the minor and obtain the consent of (i) the minor and/or (ii) the parents or legal guardians as prescribed by the law.

## **6. Entities (organizations, individuals) related to personal data processing**

To achieve the purpose of personal data processing as stated in section 3 of this Notice, TCV may share or transfer the personal data of Customers and/or third parties, or individuals related to Customers to one or more of the following:

- Employees of TCV, shareholders, branches, representative offices, business locations of TCV, and its parent company, subsidiaries, affiliate companies, and affiliated companies of Transcosmos Vietnam Company Limited;
- Companies and/or organizations that act as suppliers, partners, agents, and/or advisors to TCV, including but not limited to insurance companies, administrative-service providers, postal services, marketing, sales, customer care centers, HR management, data processing, IT, computing, payment, debt recovery, credit information, market research services, reward programs, record storage and management, data entry, legal services, social media, telecommunications, networking, phone services, infrastructure and technological support, workforce management, risk reporting, information security, data centers, workshops, advisory services, banks and payment intermediaries, medical institutions, healthcare centers, or other organizations or individuals providing related services, or supporting TCV's business operations and customer service;
- Businesses, individuals, authorized agencies, or third-party entities that TCV is permitted or obligated to disclose to by the law or according to any contract or commitment between the third parties and TCV;
- Organizations, individuals, or businesses related to the enforcement, maintenance, and protection of any rights of TCV according to Product contracts, services, agreements between TCV and Customers.

## **7. Oversea Transfer of Personal Data**

- To achieve the purpose of personal data processing mentioned in section 3 of this Notice, Customers' personal data may be sent, stored, and processed in Vietnam or in other countries where TCV has its

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headquarters, or in countries where individuals/organizations involved in the process of Personal Data processing as defined in section 6 of this Notice are based.

- When providing/sharing personal data overseas, TCV ensures that the transferred personal data will be securely protected and in compliance with legal obligations, regulations related to the transfer and processing of personal data as mentioned in this Notice and as stipulated by the law.

## **8. Potential Consequences of Personal Data Processing**

During the process of personal data processing, TCV always strives to comply with legal regulations, ensure security barriers, and apply maximum possible information system security measures to protect customers' personal data at the highest level. However, due to technical reasons or other factors beyond TCV's control, data loss or leaks can occur, leading to unwanted consequences and damages for customers and/or TCV. In such cases, TCV will do its utmost to timely prevent potential consequences and reinforce security barriers, minimizing damages to customers. As mandated by the law on personal data protection, TCV will immediately notify customers, related parties, and relevant authorities of any violations in personal data processing.

## **9. Start and End Time of Data Processing**

TCV will process customers' personal data from the moment the data is provided or collected for TCV until the completion of the personal data processing purpose mentioned in Section 3 of this Notice and/or until the legal deadline for each specific type of personal data (including but not limited to accounting laws, anti-money laundering laws, insurance business laws, inspection laws, audit laws, and other relevant laws).

## **10. Rights and Responsibilities of Customers**

Customers have the rights to: Be informed, agree, access, withdraw consent, request data deletion, restrict data processing and provision, object to data processing, complain, denounce, initiate legal action, request compensation for damages, and protect themselves under the law on personal data protection.

Customers have to obligation to: protect their personal data; ask related organizations or individuals to protect their personal data; provide accurate and complete personal data when giving consent to TCV's data processing; comply with the law on personal data protection and other legal obligations.

## **11. TCV's contact information**

If customers have any questions, requests, or complaints related to personal data processing

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according to this Notice, or if customers need to access and edit their personal data, please contact us through the following methods:

- TCV Headquarters at:
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- + Branch at: 8th and 10th floors, Scetpa Building, 19A Cong Hoa, Ward 12, Tan Binh District, Ho Chi Minh City
- Email us at: [info@trans-cosmos.com.vn](mailto:info@trans-cosmos.com.vn)
- Call our Customer Service Hotline at: (024) 3862 2288 (HN) hoặc (028) 38 110 668 (HCM)
- For contact information, you can refer to the "Contact" section on the website: <http://trans-cosmos.com.vn>

This notice is issued in Vietnamese and translated into English. In case of any discrepancies between the Vietnamese and English versions, the Vietnamese content will be given priority.

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