

PERSONAL DATA PROTECTION POLICY OF VINACADEMY EDUCATION AND TRAINING LIMITED LIABILITY COMPANY AND VINUNIVERSITY

This Personal Data Protection Policy describes how VINACADEMY EDUCATION AND TRAINING LIMITED LIABILITY COMPANY and VINUNIVERSITY (hereinafter referred collectively to as the "VinUniversity") collects, uses, and processes personal data arising from VinUniversity's activities and operations.

1. GENERAL PROVISIONS

- 1.1 Personal Data:** refers to information in the form of symbols, written text, numbers, images, sounds, or similar forms in an electronic environment associated with a specific individual or helping to identify a specific individual. Personal Data includes Basic Personal Data and Sensitive Personal Data.
- 1.2 Data Subject:** is the individual to whom Personal Data pertains, including all individual customers using VinUniversity's products and services, employees of VinUniversity, shareholders, and/or other individuals with legal relationships with VinUniversity.
- 1.3 Processing of Personal Data:** refers to one or more operations affecting Personal Data, such as: collection, recording, analysis, verification, storage, modification, disclosure, combination, access, retrieval, withdrawal, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction of Personal Data, or other related actions.
- 1.4** When the Personal Data of the relevant parties of the Data Subject (including but not limited to information about dependents, legal related persons, spouses, children and/or parents and/or guardians, friends, beneficiaries, authorized persons, partners, emergency contacts, or other individuals of the Data Subject) is provided to VinUniversity, the Data Subject and the relevant parties of the Data Subject guarantee, ensure, and are responsible that the information provided is complete and has been legally agreed/consented by the Data Subject for processing for the purposes stated in this Policy. The Data Subject and the relevant parties agree that VinUni is not responsible for validating the legality or validity of this consent and that the responsibility for storing evidence lies with the relevant parties and the Data Subject. VinUniversity is exempted from liability and is entitled to compensate for damages and related costs if the Data Subject and/or the relevant parties fail to comply with the provisions stated herein.
- 1.5** By registering to use VinUniversity's products and services, entering into contracts, and/or allowing VinUniversity to process Personal Data, the Data Subject accepts all terms without any conditions related to the policies mentioned here and any changes (if any) from time to time.
- 1.6** This Policy may be updated, amended, supplemented, or replaced by VinUniversity from time to time and will be posted on VinUniversity's official website (<https://vinuni.edu.vn/>). You should regularly visit and check our website to stay updated with the latest changes.

1.7 VinUniversity commits to comply with the following principles when Processing Personal Data:

- (i) VinUniversity processes and protects Personal Data in accordance with Vietnamese laws, fully complying with all contracts, agreements, and other documents established with the Data Subject.
- (ii) VinUniversity collects Personal Data for specific, clear, and legal purposes within the scope of the purposes stated in Section 3 of this Policy and in compliance with Vietnamese laws.
- (iii) VinUniversity always applies and updates technical measures in compliance with Vietnamese law to ensure the safety of Personal Data, including measures to protect against unauthorized access and/or destruction, loss, or damage to Personal Data.
- (iv) VinUniversity stores Personal Data appropriately and only for as long as necessary to process it in accordance with Vietnamese law.
- (v) VinUniversity is committed to complying with regulations related to the protection of children's data.

2. PERSONAL DATA TO BE PROCESSED

To enable VinUniversity to process Personal Data for the purposes mentioned in Section 3 of this Policy, VinUniversity may process the following types of Personal Data:

2.1 *Basic Personal Data* includes:

- (i) Surname, middle name, and first name, including any other names (if applicable);
- (ii) Date of birth; date of death or disappearance;
- (iii) Gender;
- (iv) Place of birth, place of registration, permanent address, temporary address, current residence, hometown, contact address;
- (v) Nationality;
- (vi) Individual images; information obtained from security systems, including image recordings of the Data Subject on the camera systems and surveillance cameras at VinUniversity's business/transaction locations;
- (vii) Telephone number, identity card number, citizen identification number, personal identification number, passport number, driver's license number, vehicle license plate number, personal tax code, social insurance number, health insurance card number;
- (viii) Occupation and workplace;
- (ix) Marital status;
- (x) Family relationship information (parents, children);
- (xi) Information about the individual's digital account; Personal Data reflecting preferences, online activity history;
- (xii) Other information linked to or identifying a specific person not classified as Sensitive Personal Data under Section 2.2 below.

2.2 *Sensitive Personal Data* includes the following main data:

- (i) Political views, religious beliefs;
- (ii) Health status and personal information recorded in medical records, excluding blood type information;
- (iii) Information related to racial origin, ethnic origin;
- (iv) Information about inherited or acquired genetic traits of individual;
- (v) Information about physical attributes, unique biological characteristics of individual;
- (vi) Data about criminal offenses, criminal behavior collected and stored by law enforcement agencies;
- (vii) Information about the Data Subject's bank account;
- (viii) Location data of the Customer determined through location services;
- (ix) Other Personal Data classified by law as specific and requiring necessary security measures.

3. PURPOSES OF PERSONAL DATA PROCESSING

Personal Data may be processed for one or more of the following purposes:

- 3.1** Assessing the ability to provide products, services, and/or enter into contracts with the Data Subject, including but not limited to:
 - (i) Identifying and verifying information about the Data Subject;
 - (ii) Evaluating, reviewing and approving the provision of products and services according to the registration documents, applications, contracts of the Data Subject and/or related persons of the Data Subject;
 - (iii) Considering whether to provide or continue providing any products or services of VinUniversity to the Data Subject.
- 3.2** Fulfilling obligations in contracts, agreements, terms, conditions, and other documents between VinUniversity and the Data Subject, supporting customers including but not limited to:
 - (i) Fulfilling contractual obligations and providing products and services to the Data Subject;
 - (ii) Updating and processing the Data Subject's information;
 - (iii) Taking care of and settling complaints and lawsuits of Data Subjects;
 - (iv) Using and transferring to partners Personal Data and relevant information to identify and fix problems of products and services; product repair;
 - (v) Contacting and notifying the Data Subject;
 - (vi) Implementing promotional programs, exchanging gifts, awarding, delivering gifts;
 - (vii) Performing other customer care and support activities.
- 3.3** Enhancing the quality of VinUniversity's products and services including but not limited to:
 - (i) Providing information that the client has requested or that VinUniversity finds useful to the client;
 - (ii) Improving technology, interface of websites, social networks, and applications to ensure convenience for customers;

- (iii) Managing customer accounts and loyalty programs;
 - (iv) Statistics and data analysis for research, development, development and improvement of products and services; improve customer experience;
 - (v) Developing and providing new products and services that are personalized according to the actual needs and conditions of customers;
 - (vi) Introducing and providing promotions and incentives for products and services of VinUniversity and of VinUniversity in cooperation with partners;
 - (vii) Proposing products and services that customers may be interested in through identifying customer interests.
- 3.4** Supporting VinUniversity's business and operation activities, including but not limited to fulfillment of reporting, financial, accounting, and tax obligations, auditing, compliance activities, and other activities serving VinUniversity's legitimate business in cases that VinUniversity deems necessary.
- 3.5** Restructuring and transfer of projects/enterprises:
In the course of business, VinUniversity may sell or buy businesses or restructure the business or transfer other projects or services in accordance with the provisions of law. Accordingly, Personal Data and the right to use information in general are among the transferred assets. In all cases, the transfer and processing of data will be carried out by the parties in accordance with the provisions of the law and this Policy.
- 3.6** Marketing: Building marketing campaigns, promoting products and services, including building campaigns based on customer preferences.
- 3.7** Prevention, caution, investigation and detection of crimes.
- 3.8** Protect social order and safety, protect the legitimate rights and interests of Data Subjects, VinUniversity and other related parties.
- 3.9** Compliance with the provisions of law and international treaties to which Vietnam is a signatory, including but not limited to:
- (i) To provide to competent state agencies in accordance with law;
 - (ii) In order to fulfill its obligations in accordance with the provisions of law, international treaties that VinUniversity must comply with (if any).
- 3.10** Other purposes obtained the consent of the Data Subject.

4. METHODS OF PROCESSING PERSONAL DATA

4.1 *How the data is collected*

Methods of Collection Personal Data is collected as follows:

- (i) ***From VinUniversity's websites and applications:*** Personal Data is collected when the Data Subject fills out forms provided on VinUniversity's websites and applications.
- (ii) ***From providing products and services and fulfilling contractual obligations of VinUniversity:*** Personal Data is collected when the Data Subject purchases, registers for, uses any product or service, or enters into a contract with VinUniversity.

- (iii) ***From exchanges and communications with the Data Subject:*** Personal Data is collected through interactions between VinUniversity and the Data Subject (in person, by mail, phone, online, call centers, electronic communication, or any other means), including surveys.
- (iv) ***From social networks:*** This includes VinUniversity's social networks and/or social networks cooperated by VinUniversity with partners.
- (v) ***From recording and imaging devices:*** located at stores, business points or places where part or all of VinUniversity's business activities are carried out that the Data Subject meets, appears or interacts with VinUniversity.
- (vi) ***From interactions or automated data collection technologies:*** VinUniversity may collect automatically recorded information from connections:
 - Cookies, pixel tags, and other similar technologies;
 - Any technology capable of tracking personal activity on devices or websites;
 - Other data information is provided by a device.
- (vii) ***Other means:*** VinUniversity may collect Personal Data from public or official information sources or by receiving necessary data sharing from parent companies, subsidiaries, affiliates, partners during cooperation with VinUniversity, in accordance with legal regulations.

4.2 *How the data is stored*

Personal Data is stored in Vietnam at VinUniversity's database system or wherever we or our affiliates, subsidiaries, affiliates, partners or service providers have facilities.

The storage period of personal data is determined based on the purpose of use as stated in this Policy and in accordance with the applicable regulations.

4.3 *How the data is transferred/shared*

- a) VinUniversity will not sell Personal Data to any party. VinUniversity uses the necessary security measures to ensure that the transfer/sharing of Personal Data is secure. Personal Data shared by VinUniversity with (i) VinUniversity's parent company, subsidiaries, affiliates; (ii) individuals/organizations involved in the processing of Personal Data as set out in this Policy; or (iii) competent state agencies or other cases in accordance with the applicable regulations.
- b) If the recipient of Personal Data is headquartered outside the territory of Vietnam, when providing/transferring Personal Data abroad (including but not limited to the use of cyberspace, equipment, electronic means or other forms to transfer Personal Data outside the territory of Vietnam), VinUniversity will require the receiving party to ensure the safety and security of the Personal Data provided/transferred. VinUniversity is committed to fully complying with the regulations and compliance requirements of Vietnamese law to protect the safety of Personal Data.

4.4 *How the data is analyzed*

Personal Data is analyzed based on VinUniversity's internal processes, data security principles and information security for information technology systems.

4.5 *How the data is encrypted*

When necessary, the processed Personal Data is encrypted in accordance with appropriate encryption standards during storage or transfer and processing to ensure that the data is protected at all times.

4.6 *How the data is deleted*

Upon the termination of contracts or termination of using products, services of VinUni or reasonable request of the Data Subject, VinUniversity will delete the stored Personal Data, except for the following cases:

- (i) The law does not allow data deletion or require mandatory data storage;
- (ii) Personal Data is processed by competent state agencies for the purpose of serving the activities of state agencies in accordance with law;
- (iii) Personal Data has been disclosed in accordance with the law;
- (iv) Personal Data is processed to serve legal requirements, scientific research and statistics in accordance with law;
- (v) In case of national defense and security emergencies, social order and safety, major disasters, dangerous epidemics; when there is a risk of threatening security and national defense but not to the extent of declaring a state of emergency; prevention and combat of riots, terrorism, crime and law violations;
- (vi) Responding to an emergency situation that threatens the life, health, or safety of a Data Subject or other individual.

Throughout the Processing of Personal Data, security is the highest priority of VinUniversity. VinUniversity takes appropriate technical measures to prevent unauthorized access to and use of Personal Data. We also regularly collaborate with security experts to update the latest cybersecurity techniques to ensure the safety of Personal Data. Your payment card data issued by financial institutions is protected by VinUniversity on the principle that important payment card data (card number, full name, CVV number) is not recorded on our system. Your payment transaction is made on the system of the relevant bank.

5. *PROCESSING OF CHILDREN'S PERSONAL DATA*

5.1 VinUniversity will Process Children's Personal Data in accordance with the principle of protecting the rights and best interests of children and in accordance with the provisions of the law.

5.2 VinUniversity only processes the Personal Data of children and provides products and services to children, if the parent or guardian consents to the use of VinUniversity's products and services, consents to VinUniversity processing the Personal Data of the child, agrees to this Policy and comply with the requirements of relevant laws. In the event that a child aged 7 years or older uses VinUniversity's products and services, in addition to the requirements set forth herein, VinUniversity will only process the child's Personal Data with

the consent of the child. The parent or guardian is responsible for obtaining the consent of the child before providing the child's Personal Data to VinUniversity.

6. CONSEQUENCES AND UNEXPECTED DAMAGE ARE LIKELY TO OCCUR

6.1 VinUniversity uses many different information security technologies such as firewall systems, access control measures, encryption, etc. to protect and prevent unauthorized access, use or sharing of Personal Data. Nevertheless, VinUniversity cannot commit to ensuring absolute security of Personal Data in certain cases such as:

- (i) Hardware and software errors in the process of data processing that cause loss of data of the Data Subject;
- (ii) The security vulnerability is beyond the control of VinUniversity, the system is attacked by hackers, causing data to be exposed and leaked.

6.2 VinUniversity recommends that Data Subjects keep confidential information related to account login passwords, OTP codes and do not share this content with any other person.

6.3 The Data Subject should be well aware that at any time when the Data Subject discloses and makes public their Personal Data, such data may be collected and used by others for purposes beyond the control of the Data Subject and VinUniversity.

6.4 VinUniversity recommends that Data Subjects preserve personal devices (phones, tablets, personal computers, etc.) during use. The Data Subject should log out of their account when not in use.

6.5 In case the data storage server is attacked, which leads to the loss, disclosure or leakage of Personal Data, VinUniversity will be responsible for notifying the case to the investigating authorities for timely handling and notifying the Data Subject in accordance with the law.

6.6 Cyberspace is not a secure environment, and VinUniversity cannot guarantee that Personal Data shared over cyberspace will always be secure. When transmitting Personal Data over cyberspace, the Data Subject should only use secure systems to access the website, application or device. The Data Subject is responsible for keeping their access credentials on each website, application or device securely and confidentially.

7. START TIME, END TIME OF PROCESSING OF PERSONAL DATA

7.1 Personal Data is processed from the moment VinUniversity lawfully receives the Personal Data and VinUniversity has an appropriate legal basis for processing the data in accordance with the law.

7.2 Personal Data will be processed until the purposes of the data processing have been completed.

7.3 VinUniversity may be required to store Personal Data even if the contract between the parties has been terminated in order to perform its obligations in accordance with the law and/or the requirements of the competent state authorities.

8. ORGANIZATIONS AND INDIVIDUALS PARTICIPATING IN THE PROCESSING OF PERSONAL DATA

8.1 As the case may be, VinUniversity may be the controller of personal data or the controller and processor of personal data.

8.2 To the extent permitted by law, the Data Subject clearly understands that VinUniversity may share Personal Data for the purposes stated in this Policy with the following organizations and individuals:

- (i) Parent companies, subsidiaries and associated companies of VinUniversity;
- (ii) Organizations and individuals providing services and/or cooperating with VinUniversity, including but not limited to: agents, auditors, lawyers, business partners, providers of information technology solutions, software, applications, operational services, management, troubleshooting, and infrastructure development;
- (iii) Any individual or organization that is a representative, authorized party of the Data Subject, acting on behalf of the Data Subject.

The sharing of data will be carried out in accordance with the order, manner and current legal regulations. The recipients of Personal Data are obligated to keep Personal Data confidential in accordance with this Policy, VinUniversity's internal regulations, standards for the protection of Personal Data and applicable legal regulations.

8.3 VinUniversity may be required to share Personal Data with competent state authorities in accordance with the law.

9. RIGHTS OF DATA SUBJECTS

9.1 Right to know about their Personal Data processing activities, unless otherwise provided by law.

9.2 Right to consent or object to consent to the Processing of their Personal Data, unless otherwise required by law.

9.3 Right to view, correct or request correction of their Personal Data, unless otherwise required by law.

9.4 Right to withdraw consent.

9.5 Right to erasure data.

9.6 Right to restrict the processing of their Personal Data in accordance with the law.

9.7 Right to request the provision of their Personal Data, unless otherwise provided by law.

9.8 Right to object to data processing.

9.9 Right to complain, denounce and initiate lawsuits.

9.10 Right to claim damages.

9.11 Right to self-protect.

The Data Subject may exercise these rights by making a request to VinUniversity. The request form must be sent to VinUniversity with basic contents such as the requester's information, detailed request content (e.g. type of data to be provided or to be deleted, text name, record (if any)), reason and purpose when making the request, relevant information depending on the specifics of the

request (e.g. request documents, the request for supply needs to be in the form of a file or paper, the address for receiving documents, etc.). All costs (if any) arising from the fulfillment of the requirements stated herein including but not limited to the cost of printing, photocopying, postage, courier fees for sending the data will be borne by the requester and must be paid at the latest upon receipt of the data or a period set by VinUniversity.

VinUniversity will process the requests of the Data Subject in accordance with the provisions of the law and consider the legitimate interests of the Data Subject. However, in the event that the Data Subject withdraws their consents, requests the deletion of the data and/or exercises other relevant rights with respect to any or all of the Personal Data that affects the ability to provide/maintain VinUniversity's products, services to the Data Subject or maintaining the contractual relationship, depending on the nature of the Data Subject's request, VinUniversity may consider and decide not to continue to provide VinUniversity's products and services to the Data Subject or terminate the contractual relationship between VinUniversity and the Data Subject. Acts carried out by the Data Subject under this regulation shall be deemed to be a unilateral termination by the Data Subject for any relationship between the Data Subject and VinUniversity and may lead to a breach of obligations or contractual commitments between the Data Subject and VinUniversity, and VinUniversity reserves its legal rights and remedies in such cases. Accordingly, VinUniversity will not be liable to the Data Subject for any losses incurred and VinUniversity's legal rights will be fully reserved. With reasonable efforts, VinUniversity will make a lawful and valid request from the Data Subject within a reasonable time in accordance with the applicable regulations. However, for security purposes, VinUniversity may require the Data Subject to verify their identity before processing the Data Subject's request.

VinUniversity has the right to refuse to comply with the requests of the Data Subject in certain cases, including but not limited to: (i) The Data Subject does not comply with the order and procedures instructed by VinUniversity in which the content of the request is missing or invalid; (ii) The Data Subject fails to provide or inadequately provides papers and documents for identity verification; or (iii) in case VinUniversity assesses that there are signs of fraud or violation of Personal Data protection; or (iv) the applicable regulations do not allow the implementation of the request of the Data Subject.

10. OBLIGATIONS OF THE DATA SUBJECT

- 10.1** Self-protection of personal data; request other relevant organizations and individuals to protect their Personal Data. Promptly notify VinUniversity when detecting any errors, mistakes, leaks of Personal Data or suspicion that Personal Data is being breached.
- 10.2** Respect and protect the personal data of others.
- 10.3** Provide complete and accurate Personal Data when agreeing to allow the Processing of Personal Data. If there is any false information, the Data Subject will bear it at its own expense in the event that such information affects or restricts the interests of the Data Subject.

- 10.4** Comply with the law on personal data protection and participate in the prevention and control of violations of regulations on personal data protection.
- 10.5** Other responsibilities as prescribed by law.

11. OTHER REGULATIONS

- 11.1** The Data Subject confirms that, by accepting this Policy, the Data Subject has consented to the Personal Data being processed by VinUniversity, the organization or individual participating in the Processing of Personal Data process as set out in this Policy, know the type of data to be processed, the purpose of the data processing, the individual entity to which the Personal Data is processed, and its rights and obligations in relation to the Personal Data. The Data Subject has been notified, known and consented to all contents that need to be notified before the Personal Data is processed by VinUniversity, organizations and individuals participating in the Processing of Personal Data process. The Data Subject agrees that VinUniversity, organizations and individuals involved in the Processing of Personal Data do not need to notify each other before the Processing of Personal Data.
- 11.2** If you have any questions about VinUniversity's personal data protection, please contact us and we will try to answer your question as soon as possible. You can also contact us at the address below:

VinUniversity: Vinhomes Ocean Park Urban Area, Da Ton Commune, Gia Lam, Hanoi, Vietnam.

Email: info@vinuni.edu.vn.