

## TRANSPARENCY REPORT

### Introduction

**Privacy Compliance Joint Stock Company** (hereinafter “PrivacyCompliance”, “PC”, “we”, “us” or “our”) is committed to being fully transparent about our privacy practices. Here, we describe our policy for managing government and law enforcement requests to access personal data that is stored in our systems, and we provide Transparency Report that documents the requests we have received to date.

### Government and law enforcement request policy

PC does not voluntarily disclose any personal data of clients to government authorities or otherwise grant them access to such data. In addition, PC has not built, and will not purposefully build, backdoors to enable government actors to access its data or information systems, and has not changed, and will not purposefully change, its processes in a manner that facilitates government access to data.

However, PC may receive a legally binding subpoena, writ, warrant, or other court order from a government authority requesting that it disclose a client’s personal data. PC will only provide the requested client data in response to formal and valid legal process. Where PC receives such a request, PC’s legal team reviews the request to ensure that it satisfies applicable legal requirements. If the legal assessment reveals legitimate and lawful grounds for challenging the request, PC will do so where appropriate. PC’s policy is to construe such requests narrowly to limit the scope of the personal data provided.

For PC to disclose any client data, the request must also satisfy the following requirements:

- be made in writing and on official letterhead,
- identify and be signed by an authorized official of the requesting party and provide official contact information, including a valid email address,
- indicate the reason for, and nature of, the request,
- identify the client or client account that is the target of the request,
- describe with specificity the data/information sought and its relationship to the investigation, and
- be issued and served in compliance with applicable law.

Where PC receives a legally binding request for a client’s personal data, PC’s policy is to notify the client via email before disclosing any information. To the extent permissible under the request and/or applicable law, the notice will describe the personal data requested, the authority making the request, the legal basis of the request, and any response already provided. This notice gives the client an opportunity to pursue a legal remedy, such as filing an objection with a court or the requesting authority.

Exceptions to PC’s policy for personal data requests by government authorities:

- Statutory provision or court order may prohibit PC from notifying the client about the request, but PC will make reasonable efforts to obtain a waiver of the prohibition or provide notice once the prohibition requirement ends.
- PC might not give notice to the client in exceptional circumstances involving imminent danger of death or serious physical injury to any person or to prevent harm to PC’s services.
- PC might not give notice to the client when it has reason to believe that the notice would not go to the actual client account holder, for instance, if an account has been hijacked.
- Where PC identifies unlawful or harmful activity, or suspects any such activity, related to a client’s account, it might notify appropriate authorities, such as in the cases of hacking.

## Transparency report

PC’s Transparency report shows:

- The countries where we operate
- The number of requests received per country
- The identities of the requesting authorities
- The number of accounts related to each request
- The types of personal data requested
- The number of requests we have challenged
- The number of times we disclosed personal data in response to the requests

Business entity	Number of requests received	Name of the country and government/ law enforcement authority	Number of client accounts affected by the request(s)	Type(s) of personal information requested	Number of requests we challenged	Number of disclosures we made
PC	0					

## Additional information

For more information on PC’s privacy and security practices, please refer to our [Privacy Notice](#). If you have questions, requests or concerns regarding your privacy and rights, please let us know how we can help.

## Contact Details

- Email: [info@privacycompliance.vn](mailto:info@privacycompliance.vn)
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- Website: [privacycompliance.vn](http://privacycompliance.vn)