

Privacy Notice

Last updated and effective date: June 16, 2025

This Privacy Notice ("Notice") reflects our **Privacy Compliance JSC** ("PrivacyCompliance", "PC", "we", "us", or "our") privacy practices and standards as of the effective date. **Privacy Compliance JSC** is a consulting and technology-powered privacy solutions company headquartered on the 5th floor, Diamond Flower Tower, Hoang Dao Thuy Street, Thanh Xuan, Hanoi, Vietnam. Our online properties may include links to websites and online services that are operated by other companies not under the control or direction of PrivacyCompliance. If you provide or submit personal data to those websites or online services, the privacy policies on those websites or online services may apply to your personal data.

We only use data collected in a third-party context through websites **privacycompliance.vn**, and **dataprotection.vn** for purposes related to managing consent preferences. We do not use or share such data to enable tracking of particular users or devices by other services.

PrivacyCompliance is committed to promoting responsible data use and stewardship. We provide simple, scalable, and intelligent solutions to help businesses integrate privacy into their strategies and operations, enabling effective management of privacy compliance and risk.

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You May Need to Know

What is personal data?

Personal data is data that identifies, relates to, describes, or can be associated with you, including data that could be used to identify you. It covers basic (e.g., name, address, email, ID number) and sensitive personal data (e.g., biometric data, religion, health check information).

Who is the data subject?

A data subject is a natural person who is identified or identifiable by or through personal data. In this Notice, data subjects may include website visitors, customers, partners, employees, job applicants, or any other individuals whose personal data we process.

Who are the data controller and processor?

The data controller is the organization or individual that determines the purposes and means of processing personal data. For example, if you are employed by us, we determine the purpose (e.g., human resource management) and the means (e.g., what data to collect, how to collect and store it) of processing your personal data. In this context, we act as the data controller.

The data processor is the organization or individual that processes personal data on behalf of the data controller. For instance, if we are engaged by a customer to provide outsourced Data Protection Officer (DPO) services, we process personal data strictly under the customer's instructions and for their specified purposes. In that case, we act as a data processor.

Processing Your Personal Data

How we collect your personal data depends on how you interact with us

The categories and specific types of personal data we obtain about you depend on how you interact with us and our products and services. Depending upon this interaction, you may fall into one of the following data subject categories:

- **Website Visitors** – Those who visit our website or online properties.
- **Customers/Partners** – Those who are customers, business partners, or express interest in our solutions or content.
- **Employees/Applicants** – Those who are employees, direct contractors, job applicants, or former employees.
- **General Consumers** – Those who engage with us in activities or relationships not already listed, for example, respondents to customers' assessments, vendors.

We list the activities below (sources) in which we collect personal data on or from you. Depending upon the activity (source), we may collect different categories and specific types of personal data from you as mentioned above. These activities may overlap; for example, a customer may visit our website. If you provide any personal data to us online, such as by filling out a form, attending a webinar, or through cookies (tracking technologies), we only use this information with your consent. Depending on how you interact with us, you may withdraw consent by exercising **Your Rights** as described below, by submitting a request through email to the address: info@privacycompliance.vn.

Where your personal data is stored or accessed

Because we have engineering, product, and support operations in Vietnam, most personal data will be accessed from this location. Most data is hosted at OneDrive by Microsoft in Singapore. In addition, through our remote work environment, we may have employees or contractors who access the data from other countries, such as Germany, Ireland, or the United Kingdom.

ONLINE ACTIVITIES – Data subject categories: all

There is information provided to us anytime you visit our website or engage in other online activities, such as using our solutions or attending online events. In most cases, such information is collected based on consent (if required by laws) or on other grounds (where applicable), to ensure our website or other online activities function properly, or that we can deliver the user experience that we intend to provide. We have made every effort to be comprehensive, but if you have any questions, please do not hesitate to contact us. We shall keep this information for as long as we have a business relationship or potential relationship with you, while ensuring data processing principles.

Online Forms

We process information you provide, such as your name, email address, company where you work, phone number, job function, job title, country, and any comments you submit. Given that we are a business-to-business (B2B) company, we do this in order to respond to

your request for information or resources or, to collect information in order to reach out to you for potential business interest. We may reach out to you with marketing communications using the information you submit in these online forms. You can opt out of future communications via email at info@privacycompliance.vn. If you do opt-out, but then complete another form, you are essentially canceling your previous opt-out.

Cookies and online tracking technologies

We use cookies and other data collection technologies to help you with the following: to navigate our website or technical solutions; to personalize and provide a more convenient experience to you; to analyze which pages you visit, which features you use in our technical solutions, and which consumer privacy tools you use; to provide features such as social sharing widgets and videos; to measure advertising and promotional effectiveness; to assess which areas of our site you visit to remarket to you after your visiting; and to provide content to you from our third-party content partners.

We use browser sessions and persistent cookies. **Session cookies** are temporary cookies that are erased from your device's memory when you close your Internet browser or turn your computer off, while **persistent cookies** are stored on your device until they expire, unless you delete them before that time. We group browser cookies on our site into two different categories: essential cookies and non-essential cookies.

- **Essential cookies:** These cookies are necessary to enable the basic features of this site to function, such as allowing images to load or allowing you to select your cookie preferences. Essential cookies are activated by default as they are mandatory for the website to operate effectively and securely.
- **Non-essential cookies:** These cookies help us improve your experience and the performance of our site. They allow us to analyze how the site is used, and provide a more personalized experience. They may also be used for advertising purposes – for example, to show you more relevant ads, enable social sharing features, or support interactive elements such as comments.

Some cookies may be placed by third-party service providers who perform some of these functions for us.

For the first time visiting our website, you may provide consent to cookies by interacting with our cookie banner. The banner will clearly explain the types of cookies used (e.g., essential, functional, and advertising) and kindly ask for your consent. By clicking "Accept All", you consent to the use of all categories. If you prefer to limit which cookies are set, click "Manage" to review and enable or disable individual categories; your choices will be saved and used to control which cookies load. You can customize cookies that are not classified as essential. You may withdraw or change your consent at any time through your browser's privacy controls, such as [Internet Explorer](#), [Google Chrome](#), [Safari](#), or [Mozilla Firefox](#).

Sometimes the browser settings contradict what you may choose on a website. For example, if you set your browser settings to refuse all non-essential cookies, then when you visit our page and make a cookie selection – that preference is stored as a cookie and, per your browser settings, may override your selection. This means the site won't remember your selection on your next visit and you may have to make a selection every visit. This may be frustrating and is not something we do deliberately. There are many efforts underway by companies, lawmakers, and others to make this a better user experience for everyone – and we at PrivacyCompliance are active in trying to make this an easier process. Finally, please note that disabling certain cookies may affect site functionality or personalized features.

Server log files

We may automatically gather server log file information when you visit our websites. This includes IP address, browser type, referring and exit web pages, and your operating system. We do this to make sure our website operates as intended or to identify what may need to be changed.

Other online activities

In order to administer our website and our technical solutions and to understand how our website visitors navigate through our websites and technical solutions, we monitor our website and solutions to continuously improve the experience of our users. We may further analyze information we gather online to improve the online experience, resources, and tools we provide to our users. This helps ensure the provision of appropriate materials or user experiences.

COMMUNICATION AND ENGAGEMENT – Data subject categories: depends on activity, see below

PrivacyCompliance is a business-to-business (B2B) company, meaning we provide our solutions to other businesses and do not typically engage with individual consumers for profit. However, individual consumers may engage with us either on behalf of our

customers or through other activities, such as webinars, events. These activities are provided in more detail in this section. We keep this information as long as we have a potential or actual business relationship with you or if there is a legal obligation to keep the information. Where you consented to providing us the information, you may also revoke your consent. Where we do not collect identifying information, we may not be able to remove the information, because we will not know which information you provided.

Suggestions, Complaints, Inquiries – Data subject categories: all

We process personal data about you for the following purposes, to which you may exercise your rights to object as described below:

- To investigate complaints or concerns to ensure that such complaints or concerns are addressed appropriately;
- To send optional customer satisfaction surveys once your complaint has been resolved in order to improve our processes;
- To evaluate the characteristics and needs of our customers to improve our solutions; and
- To communicate with you about PrivacyCompliance's events, industry or privacy-related news to engage with you as a member of the privacy community in which we participate.

Opinion / Feedback Surveys – Data subject categories: all

If you engage in our general consumer survey, we process your survey responses. You may choose to respond or not when it is presented to you. Withdrawal of consent will not be possible as we do not ask or collect identifying information and only use answers in large groupings, such as all "Yes" or "No" answers to a particular question. As a result, we cannot identify or remove individual responses.

If you participate in our market or product / services research and surveys – whether performed by us or a service provider on our behalf – we may process your email address, job title, company name, job function, phone number, region, country, survey responses, relationship with PrivacyCompliance, and any comments you submit. We may offer compensation in return for participation and may process your personal data to facilitate the provision of such compensation.

We also conduct online consumer surveys to gather your perspectives on important privacy-related issues, helping us better understand the privacy market and improve our solutions. We do not directly collect any personal data about you when we conduct these

surveys. However cookies and similar technologies may be used to manage the delivery of the surveys. You may choose to respond or not and may opt out of future communications of this nature.

Customer Engagement – Data subject categories: customers / partners

This may include voluntary participation in our customer community offerings, such as online communications, group meetings, and other engagements. Your consent shall be required prior to your participation in such activities and if so, you can revoke your consent easily by withdrawing from such activities. You are expected to follow the engagement rules, which will vary by the method of engagement.

Webinars/Presentations/Speaking Engagements – Data subject categories: all

If you register for or attend our webinars (or other presentations), your IP address and some other technical information may be disclosed to the relevant hosting provider or application, such as Microsoft Teams, Zoom, or Google Meet. Where applicable, registration information and any comments or feedback you provide to us will be captured. Follow-up information for the webinars will be sent to the email address registered, and you can opt out at any time. If you do register for another webinar, you will be opted back into communications.

If you are invited to be a guest in a PrivacyCompliance-hosted or sponsored webinar (or other presentations), your contact information will be processed as part of the production. This generally includes your name, email address, phone number, company name, image, academic distinction and job title. These programs are recorded and broadcast publicly, in line with their nature, which includes your voice, image and any information you disclose during your participation.

Interest in our Solutions – Data subject categories: website visitors, customers/partners, general consumers

If you request or indicate an interest in information about our solutions or partnership opportunities, we process your name, email address, phone number, job title, information about the company where you work, including its name, website address, and any comments you provide. We add business information related to the company where you work from third party sources, such as business intelligence providers, information from publicly available sources such as national portal of enterprise registration, tax portal,

LinkedIn, as well as information about the number and frequency of your interactions with us online and offline, such as at events, webinars, email communications, and our website. We maintain and update this information as we continue to engage with you. Engaging with you once you express interest in our solutions may be based on your consent or other basis (if applicable). If we rely on consent, this will be made clear to you that you are providing consent via your completion of a form or registration for an event. As such, you can withdraw your consent by contacting us at info@privacycompliance.vn.

Marketing Communications – Data subject categories: all

We may send you marketing communications (including sales offers, informational updates, and business development content) about our solutions, events, or resources that we believe may interest you. For these communications, we process your name, phone number, email address, postal address, job title, job function, company name, and information about the solutions you use or that may be of interest to you, including any responses you make to such communications. We may process automatic information such as what we collect via cookies, IP address, device type, browser, and email engagement metrics, including whether the email was opened and how many times it was opened. We may also associate other information to the communication for insight such as company size, company financial information, and whether the company is a current or prospective customer. In general, these communications are initiated to engage you in business, but if the information was collected through our online forms, you also consented to being contacted. We track these communications to determine whether, when, and the IP address and associated city of a marketing communication we sent was viewed, to effectively manage and improve upon such communications.

Communications may also include asking for your feedback on our solutions from your perspective as a customer or user of our solutions. We do this for our interest in having you evaluate our performance. You may opt-out at any time from marketing emails by contacting us at: info@privacycompliance.vn.

Telephone / Video Calls – Data subject categories: all

If you have consented to a recorded telephone call or video conference with PrivacyCompliance, we may process your name, email address, job title, image, and voice for analytical purposes to improve our training and customer relationship management and to provide recorded information to our customers upon request. For example, a customer may request a recording of a demo on a particular solution. For any such telephone calls or video conferences, notice of the intent to record will be provided before recording. You may decline recording at any time before the meeting, and you may request deletion of the

recording at any time. All such recorded meetings will be deleted in accordance with our internal policy.

Contracts / Relationship Management – Data subject categories: customers/partners, and vendors

We process your name, title, email address, postal address, company name, billing information (e.g., purchase order number, bank wire information, credit card number), company size, company financial information, and signature along with communication content and any comments or feedback you may provide. Some information about you may be obtained from other individuals. For example, a colleague may inform us that you moved to another company or a different role. Similarly, certain information may be available publicly, such as on LinkedIn.

We use this information in order to facilitate contract execution and to deliver on the contract. We will contact you, primarily via email, about your use of our solutions, to obtain your input on new features, functionality, and content, and to provide information about our solution updates. We will also communicate with you about PrivacyCompliance events, or industry/privacy-related news.

In addition, to better understand the needs of the privacy and business communities we aim to serve, we analyze our online and offline interactions with you. This helps us improve how we provide information and engage specifically with you, including identifying when you may be ready to make a purchase based on repeated interactions with PrivacyCompliance. We want to understand your organization and your prior experience to personalize our communications and to improve our business engagement with you. We also want to understand your business and privacy-related needs to develop and enhance our solutions to address your needs and to make them more relevant to you. Lastly, we do not make any automated decisions about you that would result in legal or similarly significant or detrimental effects on you.

USING OUR SOLUTIONS – Data subject categories: customers/partners – and their data subjects

PrivacyCompliance is a business-to-business (B2B) company, meaning we provide solutions to other companies. You may use our solutions because your company purchased our solutions for its own privacy compliance needs or because you work with a company that does business with our customers. In most cases, this information should be your business information and not your personal data, however, we do not control what information our customers enter about you and they must ensure they have valid grounds to share your personal data with us. Below, we provide information in three categories: 1) our customers' authorized users, 2) DPO service, and 3) AI Chatbot. We develop and / or discontinue solutions based on our business strategy and developments. Therefore, while not all solutions are detailed below, the information applies in a general sense based on how you choose to engage with us.

In the course of using our solutions, we may ask you to provide business information related to the company you work for. This may include information about your company's practices, policies, processes, and supporting documentation. Such business information is stored on PrivacyCompliance systems, and we use it to deliver the solutions, in accordance with the terms and conditions set forth in agreements between PrivacyCompliance and your company.

Customers' Authorized Users

Authorized users or other individuals named in our solutions, such as respondents to customer assessments, are under the control of the customers, meaning PrivacyCompliance cannot grant access to or delete information without the customers' permission. We retain this information for the duration of the customer contract, deleting it as required by the customer or for a set time period (generally three years after termination) in accordance with our agreement with the customer. If you are a licensed or other authorized user of our privacy technology platform, we process your name, email address, username, password, IP address, job title, phone number, information about the company you work for, actions you have taken on the platform or in response to communications, such as record creation, changes, input, responses, analysis, and approvals, and tickets filed on your behalf.

For individuals at our customer companies or potential customer companies, we process this information for the provision and de-provision of your account on our platform; authenticate your access on our platform, including adding users of the solution; provide customer service and support, and investigate issues that you raise; deliver our assurance programs and solutions to you; resolve disputes related to your organization's privacy practices; provide alerts in the platform based on your implementation; and help you build, implement, manage, and demonstrate your privacy program and practices using our solutions. We may further analyze usage patterns and customer characteristics (e.g., by size and industry sector) to help us understand and make decisions about customer and market needs, to improve our solutions, to design new offerings, and to inform partnership and business development decisions.

DPO Service

We provide outsourced DPO services to organizational clients. As part of this service, we may process your requests or complaints on behalf of our clients. In such cases, we act as the service provider and data processor, while our client acts as the data controller, who determines the purposes and means of the data processing.

The types of personal data we process may vary depending on the specific context. For example:

- If you submit a data subject rights request, we may process your name, email address, phone number, physical address, and content of the request.
- If you are an employee of our client seeking support or clarification regarding data protection matters, we may need to process your name, employee ID, and your specific inquiry.

Our clients are responsible for ensuring that there is a valid legal basis for us to process your personal data.

AI Chatbot

Our AI Chatbot, a community-driven initiative, requires account creation via Google authentication, during which we collect your email address, submitted questions, and interaction data (e.g., usage frequency, topic interest). This data is stored securely in our database and used solely for research and development purposes to enhance the chatbot's functionality. We may share limited data with third-party providers (e.g., Google for authentication) under strict data protection agreements.

EMPLOYMENT-RELATED ACTIVITIES – Data subject categories: employees, applicants

This section applies to current, former and prospective employees or individuals in an employment-like relationship, such as contractors, consultants, volunteers, interns, or others acting in a work-related capacity. We retain your personal data for the time period required by law or based on your consent, for example, for employment applications.

Employment Activities

Applying to work at PrivacyCompliance: If you apply for a position at PrivacyCompliance, we process personal data about your identity, qualifications, and professional background, including your application, your name (and any former names), ID number, postal address, email address, phone number, educational history (e.g., universities attended, academic degrees obtained, grades), professional certifications and licenses, employment history, and curriculum vitae or resume. For some positions, we may need you to provide sensitive information such as criminal records and health-related information. In such cases, we shall inform you of the processing purposes and allow you to decide whether to provide or not.

Offer of employment or contractor position: If we offer you an employment or a contractor position at PrivacyCompliance, we will process personal data about the position to which you have been appointed, your job title at PrivacyCompliance, the compensation or project-based contractor rate we offer to you, your signature, and your starting compensation or project-based contractor rate, your acceptance of the offer and your start date at PrivacyCompliance (if any).

Employment-Related Background checks: We may engage service providers to conduct background checks that involve the necessary personal data processing as permitted by laws of the jurisdiction where you reside and/or work. More details are provided to you in the context of our request to you to complete these checks. We also have designated employees who will do reference checks, usually HR or your supervisor. We contact individuals that you have identified and engage in conversation (written or oral) about you, your work habits, challenges, experience, and more. We do not control the information provided to us by these references.

As an employee or contractor of PrivacyCompliance: we may process personal data about your **identity and contact details** (including name, nationality, residency status, personal/work email and phone number, address, photographs, passport, visas, marital status, social security number or other government-issued identification number); **employment information** (including office or other workplace location including remote work arrangements, assigned projects, feedback and opinions, performance against your assigned goals, training completed, any performance improvement plans, any disciplinary actions taken, holiday and paid time off days which may include the reasons for the time off, system accounts, technology and physical assets provided to you, your role and actions taken in connection with PrivacyCompliance projects and processes); **compensation and benefits data** (including beneficiaries and /or dependents and their associated data related to benefits such as date of birth or relationship status, emergency contact details, financial account information, salary, incentive compensation, PrivacyCompliance stock options granted and our stock ownership); **voluntarily shared information** (including photos of pets, anecdotes about family, and other such information you choose to disclose with colleagues).

If your employment with PrivacyCompliance ends, we process personal data necessary to offboard you from PrivacyCompliance, including deactivation of your access to our systems, fulfilling our financial, benefits, and related obligations with respect to the end of your employment with PrivacyCompliance.

In certain countries, supplemental privacy notices will be provided to PrivacyCompliance employees and contractors, and where applicable, consent will be obtained to ensure compliance with local requirements.

We process personal data about you to establish and manage our relationship with you (including responsibilities) and for the efficient operation of our business, including activities necessary to comply with laws or contracts, such as to:

- Recruit new talent to join PrivacyCompliance;
- Onboard employees and contractors to PrivacyCompliance;
- Grant and manage access to PrivacyCompliance systems and facilities;
- Ensure the security and safety of the workplace and the tangible and intangible assets for which we are responsible;
- Assign roles and responsibilities;
- Manage team and cross-functional communications and collaboration;
- Foster a positive workplace culture;
- Administer payroll, benefits and incentive compensation;
- Invoice payments;
- Managing PrivacyCompliance projects and processes;
- Maintaining corporate, financial and other essential business records and reporting;
- Evaluating financial and operational performance; and
- Ensuring compliance, including, but not limited to our privacy, security, accounting, labor and employment, and other legal and regulatory obligations.

Statistical and research purposes: We may further analyze employee data to evaluate and understand employee engagement and to develop plans to continuously improve our workplace culture.

Using Devices for Work Activities

You may participate in communication processes, which may be recorded, such as video conferences, phone calls, or written correspondence, or video/audio presentations for public release (webinars, podcasts, etc.) and such may be performed from your personal device. PrivacyCompliance may inadvertently collect information from your surroundings or device. You should take this into account if using a personal device for work purposes. We may also require security software to be installed. Further details can be found in the employee handbook and throughout internal policies and communications from executives or other personnel in key roles.

PrivacyCompliance's Personnel Scope of Work

As part of your employment activities, you may engage with customers, colleagues, technology, vendors, and/or other individuals. Your actions or communications will typically be recorded via online tools, communication technologies, or CCTV. These recordings may be temporary or permanent, depending on their intent. For example, if you write code, that may become a permanent entry in PrivacyCompliance's platform. If you engage with regulators on an investigation, that will likely become a long-term record both for PrivacyCompliance and the regulator.

Your Rights & Obligations

Depending on your location, you may have certain rights under privacy and data protection laws regarding the data we process about you. You may exercise those rights by contacting us at the email address: info@privacycompliance.vn. In most cases, the performance of these rights is free, and we will aim to respond to your request via email within the specific timeframe required by the applicable laws. In addition, as a data subject, you also have certain obligations relating to your personal data.

Your Rights

Right to Access and Rectify

- You have the right to access and request the rectification of your personal data being processed by us. We will make all reasonable efforts to take the necessary steps to address your request in a timely manner, in accordance with applicable laws and regulations.
- In certain cases, due to technical reasons, system limitations, infrastructure constraints, or other factors, your ability to access, view, or rectify your personal data may be restricted. In such cases, please contact us for further assistance.

Right to Data Provision (Data Portability)

- You have the right to request, in writing, that we provide you with your personal data. Your request will be deemed valid if it includes all necessary information and complies with the applicable legal forms and requirements. You also have the right to request that we provide your personal data to another individual or organization, or that we provide you with the personal data of another data subject. In such cases,

you must submit written consent from the relevant data subject or data recipient, as applicable.

- If your request is legally valid and we are permitted by law to disclose the personal data, we will notify you through appropriate communication channels regarding the time, place, and method of data provision, along with any applicable fees, payment methods, and deadlines. The data will be provided in accordance with this Notice and other applicable legal procedures.

Right to Erasure

We will erase your personal data upon receiving a valid request from you in the following circumstances:

- you determine that your personal data no longer serves the purposes to which you originally consented and you accept the potential consequences of deletion;
- you withdraw your previously given consent;
- you object to the processing of your personal data and we lack a legal basis to continue such processing;
- your personal data has been processed for purposes other than those to which you consented or in violation of applicable laws.

We will also erase your personal data when required by applicable laws and regulations.

Right to Be Informed, to Consent, Withdraw Consent, Restrict, and Object to Processing

- You have the right to be informed about the processing of your personal data, which is outlined in this Notice. If there are any changes to our data processing activities, we will promptly notify you. You have the right to consent or withhold consent to the processing of your personal data for specific purposes. You may grant partial consent or consent under specific conditions. However, in many cases, we may only proceed with processing your data if you have provided full consent. Accordingly, when we request your consent through contracts, documents, forms, or other instruments, such consent must be complete and unrestricted.
- You have the right to withdraw your consent to data processing, request that we restrict processing, or object to the processing of your personal data under our control. In such cases, we will inform you of the implications of these actions.

Right to Complain, Denounce, Initiate Legal Action, Claim Damages, and Self-Defend

- You have the right to file complaints, denunciations, or initiate legal proceedings against us and seek compensation for damages in accordance with applicable laws if we infringe upon your rights related to personal data protection. You also have the right to protect your interests and request competent authorities or organizations to take appropriate civil protective measures as prescribed by law.

When you submit an individual rights request, you consent to our use of your information to respond to your request. Your consent includes the understanding that your request will be

handled in Vietnam, where we are located. If you do not consent, we are unable to respond to your request.

Upon receiving requests, we may take necessary steps to verify your identity or that of your authorized representative, and to assess the legitimacy of the request. We may also require additional information to complete the verification. If the request is deemed valid, we will take appropriate action. If we are unable to fulfill your request (e.g., the request lacks a legal basis or is unlawful), we will inform you of the reasons for refusal within a reasonable time, unless a specific response time is required by law.

Your Obligations

As a data subject, you are responsible for providing accurate and complete personal data as required by law or our processes, promptly notifying us of any inaccuracies, and complying with applicable data protection laws and respecting the rights and freedoms of others. You are also responsible for ensuring that any personal data you provide about others is shared lawfully. Failure to meet these obligations may affect our ability to process your data or respond to your requests.

Keeping and Securing Your Personal Data

The processing of your personal data commences either upon obtaining your consent (where consent serves as the legal basis), or from the point at which the personal data is collected (where processing is based on other legal grounds). We process data manually or through systems and software that support automated or semi-automated processing, employing varying levels of complexity and algorithms.

We will retain your personal data for as long as we provide solutions to you or your company; as long as you work for or with us; as long as we are addressing a concern, question, complaint, or request you have made to us; as required by our interactions with you; as long as the law requires us to do so; or for the time period we need to maintain the information, e.g., to respond to investigations or lawsuits. If we have a contract or other agreement with you or your company, we will follow the data retention obligations set forth in that agreement.

We may retain data longer if we have a legal obligation to do so or if it is necessary to maintain records for legal, financial, compliance, or other reporting requirements, and to

enforce our rights and agreements. We also may retain your data for statistical analysis or research purposes.

We take appropriate security measures to protect personal data against loss, misuse, and unauthorized access, alteration, disclosure or destruction. We have also implemented measures to maintain the ongoing confidentiality, integrity and availability of the systems and services that process personal data, and to restore the availability and access to data in a timely manner in the event of a physical or technical incident. In the event of an incident, we are committed to making our best efforts to resolve the issue, mitigate any potential damage, and ensure transparency in accordance with applicable legal requirements.

Disclosing Your Personal Data

At PrivacyCompliance, we only disclose personal data in ways that have been communicated to you. Depending upon your location, we do not sell or rent personal data to third parties and we do not disclose personal data to third parties that are not owned by, under control of, or in a direct business relationship with us, except as described in this Notice. We do share personal data (as defined under certain data protection laws) with third-party advertisers and website analytics providers.

Service providers / Vendors. We disclose personal data to service providers / vendors that assist us in our business activities. Service providers support us in processing the types of personal data for the purposes described in this Notice. They are only authorized to process the information as necessary and under our instructions.

Business partners. PrivacyCompliance forms a variety of partnership relationships, to whom we may exchange information legitimately under one of the reasons described in the Notice. In some cases, the partners may be contracted through PrivacyCompliance, such as customers who purchase education modules through one of our partners. In other cases, partners may disclose your information with us and their privacy notices will also apply.

Third-party cookies and similar technologies. While PrivacyCompliance does not sell personal data to third parties, PrivacyCompliance may disclose data collected through cookies and similar technologies to third parties, both to evaluate and optimize the performance of and analyze your use of our online services and for advertising purposes.

Required by law. If we are required to disclose personal data as part of a legal process, we will take commercially reasonable steps to inform you. We may also be required to disclose personal data in response to lawful requests by government authorities, including requests from national security agencies or law enforcement. Some of these requests may be from regulatory oversight agencies investigating a complaint, where others may be by law enforcement looking for information.

Safety, fraud prevention, government requests and protection of our rights are all reasons for us to disclose personal data where we believe, in good faith, it is necessary.

Mergers, acquisitions, divestitures, or asset sales provided that the acquiring entity agrees to uphold the protections described in this Notice, where this is within our control. If we are under the control of a court, such as bankruptcy proceedings, we may not have full authority to ensure this protection.

Your Control Over Personal Data Use and Sharing

If personal data covered by this Notice is to be used for a new purpose that is materially different from the purpose for which the personal data was originally collected or subsequently authorized, or is to be disclosed to a third party not acting as a service provider or vendor, in a manner not specified in this Notice, PrivacyCompliance will provide you with an opportunity to choose whether allow your personal data to be used or disclosed in such a way. Requests to opt-out of such uses or disclosures should be sent to our email address: info@privacycompliance.vn.

International Data Transfers

PrivacyCompliance is headquartered in Vietnam, and most of the data we process is transferred to or accessed from Vietnam. Customer data is hosted in Singapore. Customers should ensure that their notices reflect our transfer arrangements for their data subjects. We may also share personal data with parties outlined in section “Disclosing Your Personal Data” outside the territory of Vietnam for the purposes outlined in the Notice. When we do, we will ensure that an adequate level of protection is provided for the information by using one or more of the following approaches:

- We may enter into written agreements, such as standard contractual clauses and other data transfer agreements, with recipients that require them to provide the same level of protection for the data.
- We may seek your consent for transfers of your personal data for specific purposes.
- We may rely on other transfer mechanisms approved by authorities in the country from which the data is transferred, such as cross-border data transfer impact assessment.

Contact Us

For questions or concerns about this Notice or our privacy practices, please contact us at info@privacycompliance.vn (preferred) or by mail at PrivacyCompliance JSC, 5th Floor, Diamond Flower Tower, Hoang Dao Thuy Street, Thanh Xuan, Hanoi, Vietnam. For urgent inquiries, such as data breach concerns, please include "Urgent" in the subject line of your email. We aim to respond within 30 days, or as required by applicable law, whichever is earlier.

Miscellaneous

The law of Vietnam governs this Notice.

The heading of this Notice is for reference only.

The original language of this Notice is English. If there is a discrepancy with other language(s), English shall take precedence.

We may revise this Notice from time to time and will post the date it was last updated at the top of this Notice. We will provide additional notice to you if we make any changes that materially affect your privacy rights./.