

Transparency Report

Last updated and effective date: June 16, 2025

Privacy Compliance Joint Stock Company (hereinafter “PrivacyCompliance”, “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

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

However, PrivacyCompliance may receive a legally binding subpoena, writ, warrant, or other court order from a government authority requesting that it disclose your personal data. PrivacyCompliance will only provide the requested personal data in response to formal and valid legal process. Where PrivacyCompliance receives such a request, our 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, P PrivacyCompliance will do so where appropriate. PrivacyCompliance’s policy is to construe such requests narrowly to limit the scope of the personal data provided.

For PrivacyCompliance to disclose any data, the request must 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 purpose and nature of the request,
- identify you or your 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 PrivacyCompliance receives a legally binding request for your personal data, PrivacyCompliance's policy is to notify you via email (if applicable) 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 facilitates the exercise of your right to seek legal remedies before a competent court or the requesting authority.

Exceptions to PrivacyCompliance's policy for personal data requests by government authorities:

- Statutory provision or court order may prohibit PrivacyCompliance from notifying the client about the request, but PrivacyCompliance will make reasonable efforts to obtain a waiver of the prohibition or provide notice once the prohibition requirement is lifted.
- PrivacyCompliance 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 PrivacyCompliance's services.
- PrivacyCompliance 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 PrivacyCompliance identifies unlawful or harmful activity, or similarly suspicious activities, related to a client's account, it might notify appropriate authorities, such as in the cases of hacking.

Transparency Report

PrivacyCompliance's Transparency Report shows:

- 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
Privacy Compliance	0					

Additional information

For more information on PrivacyCompliance's privacy and security practices, please refer to our [Privacy Notice](#).

If you have any questions, requests, or concerns regarding your privacy and rights, please contact us via email at info@privacycompliance.vn (preferred), or by mail at 5th Floor, Diamond Flower Building, Hoang Dao Thuy Street, Thanh Xuan, Hanoi, Vietnam.