

**ANNOUNCEMENT ABOUT PERSONAL DATA PROCESSING AND SECURITY FROM
JULY-2023**

BACKGROUND

Hitachi Elevator Vietnam Co., Ltd (“HEV”) set out the following Personal Data Security and Processing Notice (“Notice”) which outlines the purpose, types, disclosures, right to access and correction, as well as confidentiality to customer’s personal data collected and process in accordance with Decree 13/2023/ND-CP dated 17/4/2023 on personal data protection (as amended, supplemented or superseded from time to time) and other related laws and regulations

This Notice is an integral part of the terms and conditions that govern the relationship between the Customer and the Company and should be read in conjunction with those terms and conditions

This Notice shall provide the Customer with the following information:

- The type of personal data being processing
- The purpose for processing the personal data
- Individuals, organizations who are permitted to process the personal data
- Data collection and processing methods
- The rights and obligations of the data subject; and
- Personal data protection and undesirable consequences

1. DEFINITION AND EXPLANATION

1.1 “Personal data” is data of yourself and/or all your related persons which includes electronic information in the form of symbols, letters, numbers, images, sounds, or equivalences associated with an individual or used to identify an individual. The personal data includes general Personal data and sensitive Personal data

1.2 “Personal data processing” refers to one or multiple activities that impact on personal data, including collection, recording, analysis, confirmation, storage, rectification, disclosure, combination, access, traceability, retrieval, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction or other relevant activities

1.3 When referring to individual or the data subject, it means we are referring to yourself

1.4 When referring to the Personal data controller or the Personal data controller-cum-processor, it means the Company and/or the third parties designated by the Company to process personal data in accordance with the current regulations

1.5 When referring to the Personal data processor, it means the party to whom the Company transfers the Personal data to that party for the purposes of processing in accordance with the purpose, the content which has been consented by the Customer in accordance with the law. In case the Company is an intermediary agent, authorized party, sub-contractor of another organization or individual related to the collection and transfer of personal data to such organization or individual, the Company is to be considered as the Personal data processor

2. PERSONAL DATA CONFIDENTIALITY

2.1 Company always strives to protect the confidentiality of the personal data of the Customer, employees, service providers and partners that has been provided to or collected by us

2.2 Notice is applied to individual customers, organizations, goods and service providers, business partners and the individuals, staff in a company/enterprise that has/had or going to have a commercial relationship, cooperation, using goods and services provided by us. These shall include but not limited to individual guarantor, director, shareholder, authorized signatories/dealer, obligor, company secretary, beneficial owners (e.g., sole proprietor and partners) or any authorized representative of the company/enterprise of the good and service providers, business partners (the "Relevant Parties"). Please ensure that this Notice is available to the Relevant Parties,

and you have received the express consent or duly authorized consent of all such parties before providing any of their Personal data to the Company

2.3 the security of your Personal data is our priority. In order to protect the confidentiality of your Personal data, the Company has implemented physical, electronic, and procedural safeguards including investment in systems and infrastructure to ensure Personal data security. Each of our employees is also obliged to strictly follow the Company's Code of Conduct and Ethics, and shall, trying to maintain the confidentiality of customer Personal data

2.4 Any company(ices), organizations who represent or enter a business cooperation relationship with the Company (the "service providers"), are required to protect the confidentiality of your Personal data at all times

2.5 In relation to Clause 2.4 above and Clause 5.3 below this Notice, please be notified that the Company may share the Personal data with the Company's service provider(s) and business partners in accordance with this Notice and the current regulations

3. CHOICE TO SUPPLY PERSONAL DATA

3.1 Processing your Personal data is a necessity to enable the Company to process your application for the Company's products or services. Thus, should you decline and/or unable to provide Personal data in accordance with the Company's regulation to the respective products and services, the Company may not be able to provide or must limit or stop provide the products and/or services to the Customer (e.g., applying for account opening or loan/financing)

3.2 The Company may send marketing and promotional offers to meet the Customer financial needs and objectives such as product or service upgrades, credit increases and other additional benefits. Should the Customer choose not to receive these marketing and promotional offers, you can do so by informing us and we shall be processed your request accordingly

4. TYPES OF PERSONAL DATA COLLECTED, PROCESSED

The types of Personal data collected by the Company may vary according to the business relationship that is established. The Personal data collected and processed may include the following:

4.1 General Personal data include:

- a) Last name, middle name and first name, other names (if any); Date of birth; date of death or going missing; Gender; Place of birth, registered place of birth; place of permanent residence; place of temporary residence; current place of residence; hometown; contact address; Nationality; Personal image; Marital status; Information about the individual's family relationship (parents, children)
- b) Phone number, ID Card number, personal identification number, passport number, driver's license number, license plate, taxpayer identification number, social security number and health insurance card number
- c) Digital account information: Personal data that reflects activities and activity history in cyberspace

- d) Information associated with a customer or used to identify a customer that is not sensitive information provided by the Customer or collected, verified by the Company from time to time on a legitimate basis.

4.2 Sensitive Personal data include:

- a) Political and religious opinions
- b) Health condition and personal information are stated in health record, excluding information on blood group.
- c) Information about racial or ethnic origin; Information about genetic data related to an individual's inherited or acquired genetic characteristics; Information about genetic data related to an individual's inherited or acquired genetic characteristics.
- d) Information about an individual's sex life or sexual orientation
- e) Data on crimes and criminal activities collected and stored by law enforcement agencies
- f) Information on customers of credit institutions, foreign Company branches, payment service providers and other licensed institutions, including: customer identification as prescribed by law, accounts, deposits, deposited assets, information related to the transactions between the Customer and the Company, organizations and individuals that are guarantors at credit institutions, Company branches, and payment service providers
- g) Personal location identified via location services

- h) Information from joint accountholder(s) and/or parties providing security for the Customer facilities and/or all such persons named in the Customer application for the Company products and services. These shall include but not limited to persons named in documents submitted in support of the Customer application including but not limited to the Customer family members, legal representative, directors, individual shareholders, authorized signatories and guarantors. The Customer confirm and warrant that consent has been obtained for all such individuals mentioned prior for their respective personal data to be processed by the Company; and
- i) Other specific Personal data as prescribed by law that requires special protection

5. USE OF PERSONAL DATA

5.1 The Company collects the Personal data to provide services, products that meet the Customer financial needs and objectives

5.2 In addition to the above, the Company may collaborate with business partners to jointly develop products and services or launch marketing campaigns that may involve the sharing of the Personal data

5.3 The Company and the service providers of the Company may use or processed the your Personal information for the following purposes:

- a) To establish a relationship between the Customer and the Company and/or companies related to or affiliated to the Company, service providers and business partner of the Company

- b) To process the Customers' applications for the Company products and services
- c) To evaluate and check credit history/financing worthiness
- d) To conduct evaluation, due diligence, checking, validation, KYC and screening
- e) To conduct research for analytical purposes including but not limited to data mining and analysis of the Customer transaction at the Company
- f) To manage customers, monitor, manage goods and services, evaluate and monitor provision of products and services
- g) To respond to inquiries or complaints from the Customer or for dispute resolution
- h) To administer promotions, competitions and sponsoring
- i) For the research and development of products and services for customers
- j) To allow the Company, the related and/or affiliated companies, service providers and business partners of the Company to promote, cross-sell their products and services
- k) For the purpose of debt collection, settlement of debts, collaterals or settlement of other related disputes
- l) For enforcement or defense of the Company rights and obligations of other parties to the Company and/or the affiliates of the Company

- m) To prevent fraud or detect crime or for the purpose of investigation
- n) For assessing, processing and investigating insurance risks and claims
- o) For the purpose of the Company, the parent Company's internal management; and to enable a party to evaluate any proposed or conduct any transferring, participation, and/or novation of the Company rights and/or obligations
- p) To comply with the legitimate request and regulatory requirements, which may include disclosure, notification and record retention requirements
- q) To maintain and protect the Company premises and all self-service terminals
- r) For audit and risk management, financial statements, internal reports and other relevant reports at the request of competent authorities, organizations and individuals
- s) To carry out any proposed or actual merger, sale, transfer or proposed transfer of any part of the Company interests, assets, obligations, business and/or operations
- t) To process information per the requirement of the law, to fulfill the request and/or to cooperate with any competent authorities and/or related jurisdiction
- u) For such other purposes that are not forbidden by law and with the Customer's consent at other documents; and
- v) For all other purposes which fit with any of the purposes mentioned above

5.4 Video recordings (with or without sound), specific photos and/or images from security camera, may also be used for quality assurance purposes, detecting and deterring crime or suspicious, inappropriate or unauthorized use of our facilities, products, services the Company's premises and for investigation purposes.

6. DATA COLLECTION AND PROCESSING METHODS

The Personal data may be collected, processed by the Company via the following methods:

- a) The Company shall processes by itself or through a third party with authorization or contractual relationship with the Company, including when the Company actively verifies and processes the Personal data through relevant agencies, organizations, individuals and third parties during the course of establishing relationships with customers
- b) Your Personal data may be collected by the Company when the customer's access to the Website, the Company's online Companying application (for example, the Data Subject's computer IP address and user information file), also known as cookies. If the Customer does not wish to enable cookies, he or she may change the settings on his browser and/or mobile device
- c) If the Customer has one or more accounts with the Company, the Company may link the Customer accounts and Personal data together so that the Company can have general information about the Customer's products and services at the Company

- d) The Company may collect and process audio/video recordings (with or without sound), customer specific photos and/or images which may be captured from security cameras installed at the head office, premises, offices, business locations, via self-service terminals of the Company, landline or at the Company's events

- e) The processing of the Customer's Personal data can be done in any form, including but not limited to processing through paper, audio, video recording or in the form of electronic information messages

- f) The transfer of the Customer's Personal data to agencies, organizations and individuals domestically or abroad will be done for the purposes of the provisions of this Notice or other documents related to the customers from time to time

- g) The Customer acknowledges and agrees that during the course of processing your Personal data, the Company may transfer your Personal data outside of Vietnam for providing products and services to the Customer. The Company will take all necessary data protection measures to ensure the security of customers' personal data

- h) For some insurance products or other products and services provided by the Company as an agent or intermediary, the Company will act under the authorization of a third party who is an organization or individual providing insurance service or other corresponding products and services. Accordingly, the Company will collect and process the Personal data and may transfer the Personal data to such third party for processing according to the purpose notified to the Customer in this document and/ or for the purpose of establishing a relationship between the Customer and such third party, and/or for such other purpose as will be notified to the Customer from time to time

- i) In case it is necessary to transfer the Customer sensitive Personal data to the Personal Data Processor, other third party (if any), the Company will apply the highest protection or encryption measures in accordance with the Company's internal regulations during the transfer of sensitive Personal data
- j) Applying technologies, applications, software developed by the Company itself or hired a third party (from domestic or foreign supplier partners) develop during the course of processing Personal data
- k) Other methods of processing at the Company's discretion and not contrary to the provisions of law

7. DISCLOSURE OF PERSONAL DATA

7.1 Within the below Article 7.2, when reference to the agencies, organizations, third parties, it would include the staffs of said agencies, organizations, third parties

7.2 For the purposes above and assisting the Customer, the Personal data of the Customer may be provided to:

- a) Competent authorities, organizations and individuals as prescribed by law; any person, third party required by the applicable law, government or regulation to disclose information
- b) The Company and its professional advisors and employees

- c) Parent Company, affiliates, partners of the Company, other credit institutions, other organizations for the purpose of serving and providing products and services to the Customer.
- d) Any person with confidentiality obligations towards the Company or the related companies, or affiliates of the Company (whether inside or outside Vietnam)
- e) Any financial institution that grants or intends to grant any credit/financial line to the Customer, Credit Information Center or any other credit information institution established in accordance with the applicable laws, any other relevant agencies authorized by law to collect such information, competent authorities/agencies established by the State Company of Vietnam and/or any other person who may be authorized by law or any government agency and/or regulatory body and/or any related industry association
- f) Organizations providing service such as search, verifying and rating customer information, including credit information companies
- g) Law-practicing organizations and individuals, notarization-practicing organizations; bailiff-practicing organizations, and bailiffs, independent auditing organizations, valuation and appraisal service providers, and accounting, tax and social insurance services organizations and individuals to the Company and/or the Customer
- h) Organizations and individuals providing life insurance, non-life insurance and/or other types of insurance services as prescribed by law from time to time
- i) Organizations and individuals providing information and document storage services

- j) Organizations and individuals who provide information technology services, system, software, digital signatures, electronic signatures, e-invoices, telecommunications services, network connection, transmission lines
- k) Any third party authorized by the Company or having a contractual relationship with the Company for the purpose of verification, customer identification, collection and processing of customer Personal data, debt collection, promotions, advertising, customer referrals, account management, loan management, deposit management, collateral management; Data storage, Data processing or any other service to assist the Company in providing our services or products to the Customer or to comply with the Company's internal management needs
- l) Any guarantor, security provider or any person intending to settle any outstanding amounts under the facility(ies) granted by the Company to the Customer. Any financial or other institution with which you have, or proposed to have dealings with
- m) Any operator, insurance broker and any association or federation of insurance company operators
- n) Any person or corporation to whom we merge/transfer/sell or proposed to merge/transfer/sell any part of its interests, assets, obligations, business and/or operations
- o) The Customer's authorized person, nominee, trustee, co-trustee, solicitor or other person who is involved with the provision of services or products by the Company to the Customers

- p) Third parties who are authorized parties, sub-contractors to the above-mentioned agencies, organizations and individuals

8. CUSTOMERS'S RIGHTS AND OBLIGATIONS

8.1 The Customer has the following rights regarding the Personal data:

- a) Right to be informed: The Customer has the right to be informed that the Personal data is being processed, unless otherwise provided by law
- b) Right to give consent: The Customer has the right to give consent or disagree to the processing of the Customer Personal data, unless otherwise provided for by law
- c) Right to access Personal data: The Customer has the right to access the Customer Personal data in order to look at, rectify or request rectification of the Customer Personal data, unless otherwise provided for by law
- d) Right to withdraw consent: The Customer has the right to withdraw his/her consent, unless otherwise provided for by law
- e) Right to delete Personal data: The Customer has the right to delete or request to delete the Customer Personal data, unless otherwise provided for by law
- f) Right to request restriction on processing Personal data: The Customer has the right to request the Company restrict the processing of the Customer Personal data, unless otherwise provided for by law. The restriction on the processing of Personal data shall be implemented within 72 hours after the Company received the

Customer request, and shall applied to all Personal data as per the Customer request, unless otherwise provided for by law

- g) Right to obtain Personal data: The Customer has the right to request the Company to provide your Personal data, unless otherwise provided by law
- h) Right to object to processing the Personal data: The Customer has the right to object to the Company in order to prevent or restrict the disclosure of the Personal data or the use of the Customer Personal data for advertising and marketing purposes, unless otherwise provided for by law. The Company shall comply with the Customer request within 72 hours after receiving the request, unless otherwise provided by law
- i) Right to file complaints, denunciations and lawsuits: The Customer has the right to file complaints, denunciations and lawsuits as prescribed by law
- j) Right to claim damage: The Customer has the right to claim damage as prescribed by law when there are violations against regulations on protection of the Personal data attributable to the Company, unless otherwise agreed by parties or unless otherwise prescribed by law
- k) Right to self-protection: The Customer has the right to self-protection according to regulations in the Civil Code, other relevant laws and this Decree, or request competent agencies and organizations to implement civil right protection methods according to regulations in Article 11 of the Civil Code

8.2 The Customer has the following obligations regarding the Personal data:

- a) To protect the Customer own Personal data; request relevant organizations and individuals to protect the Customer Personal data
- b) To respect and protect others' Personal data
- c) To fully and accurately provide the Customer Personal data when the Customer consents to the processing
- d) To participate in dissemination of Personal data protection skills
- e) To comply with regulations on protection of Personal data and prevent violations against regulations on protection of Personal data

9. PERSONAL DATA PROTECTION AND UNDESIRABLE CONSEQUENCES

9.1 While processing the Personal data, the Company always prioritized protecting the customer's personal data. However, the process still has some risks and undesirable consequences such as personal data leakage

9.2 Therefore, the Company constantly implements the solutions to prevent and minimize the risks mentioned above, including but not limited to

- a) Conduct Personal data impact assessment as prescribed by law
- b) Periodically review its technical and managerial measures to protect Personal data

- c) Provide training and communication to staffs who process the Personal data
- d) Only establishes contractual relationships with personal data processors who have the infrastructure and commitment to protect the Customer Personal data in accordance with the standards and requirements of the laws
- e) Comply with regulations on personal data protection

10. PROCESSING START AND ENDING TIME

Personal data processing time starts from: (6a) the date the Customer provides/gives his/her consent to the Company to process the Personal data or (6b) the date the Customer establishes a relationship to use the Company's products and services, whichever is earlier, and end when the Personal data are destroyed/terminated according to agreement and/or the laws

11. REVISION OF THE NOTICE

This Notice may be reviewed, revised and updated by the Company on its website from time to time (<https://www.hitachi-elevators.com.vn>), and/or other appropriate means of communication as the Company may define

12. CONTACT

For more information, please contact the Company using the details below:

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