

TERMS AND CONDITIONS OF PERSONAL DATA PROTECTION

This Terms and Conditions of Personal Data Protection (T&C) applies to information, including your personal data processed by Public Bank Vietnam (PBVN) referred to in this statement either individually or collectively as “the Bank”, “we”, “our”, or “us”.

This T&C is issued to inform you of the commitment of the Bank as a Personal Data Controller cum Processor to comply with the regulations and laws of protecting at all times the personal data information provided by you to us as we recognize the importance of the personal information we hold about customers and the trust you place in us.

This T&C forms a part of the respective terms and conditions governing your relationship with us, including but not limitation to, as may be applicable, the Terms and Conditions to open Current Account/Current Account Plus, Terms and Conditions for Fixed Deposit/Term Savings Deposit, Terms and Conditions for the utilization of PBVN e-Banking Service (Internet and Mobile Banking Services), Terms and Conditions of Issuance and Utilization of PBVN Domestic Debit Card/VISA Debit/VISA Credit, Terms and Conditions of Letter of Offer Agreement and Terms and Conditions of other PBVN’s products and services which you have registered (collectively “Terms and Conditions”) and should be read in conjunction with those Terms and Conditions. By applying for or using our products or services or by giving us access to your personal data, you accept the policy and practice described in this T&C.

For the avoidance of doubt, this T&C is applicable only for your personal data. By providing personal data relating to a third party (e.g., information of your dependent, spouse, children and/or parents, friends, beneficiaries, attorneys, partners, emergency contacts, or other individuals) to us, you represent and warrant that the consent of that third party has been obtained for the processing (including but not limited to collection, use and disclosure) of the personal data for the purposes listed herein. Where you are a corporate entity or organization, to the extent that you have provided or will provide personal data about your directors, shareholders, employees, authorized representatives, agents and/or other individuals, you confirm that you have explained or will explain to them that their personal data will be provided to, and processed by, us and you represent and warrant that you have obtained their consent to the processing (including disclosure and transfer) of their personal data in accordance with this T&C.

1. The types of your personal data we process

Your personal data is classified into 2 categories as (i) Basic Personal Data; and (ii) Sensitive Personal Data. Particularly as follow:

1.1. Basic Personal Data

- a) Last name, middle name and first name, other names (if any);
- b) Date of birth, date of death or date of being lost;
- c) Gender;
- d) Place of birth, registered place of birth; place of permanent residence; place of temporary residence; current place of residence; hometown; contact address;
- e) Nationality;
- f) Personal images;
- g) Phone number; ID Card number, personal identification number, passport number, driving license number, number plate, tax identification number, social insurance number and health insurance number;
- h) Marital status;
- i) Information about the individual's family relationship (parents, children);
- j) Digital account information; personal data that reflects activities and activity history in cyberspace;
- k) Information associated with an individual or used to identify an individual which is not specified as sensitive personal data.

1.2. Sensitive Personal Data

- a) Political perspective, religious perspective;
- b) Health and personal-life status stated in health record, excluding information about blood group;
- c) Information about racial origin, ethnic origin;
- d) Information about genetic characteristics which are inherited or self-acquired;
- e) Information about an individual's own biometric and physical characteristics;
- f) Information about an individual's sex-life and sexual orientation;
- g) Data on crimes, criminal activities collected, stored by law enforcement agencies;
- h) Customer information at credit institutions, foreign bank's branches, payment service providers and other authorized organizations, including: customer identification information under laws, information about accounts, money deposits, deposited assets, transactions, information on organizations, individuals acting as the guarantors at credit institutions, foreign bank's branches, payment service providers.

- i) Individual's location data determined by the locating services;
- j) Other personal data as prescribed by laws as specific data that require necessary security method.

2. **Our purposes for processing your personal data**

We, and the data processor that we engage, may process your personal data for one or more of the following purposes:

- a) for identity and background establishment; authentication and screening;
- b) to conduct checks with the authority agencies on registering the anti-spam messages, emails, calls or other registries (if any);
- c) to assess and process your application(s)/request(s) for any of the products or services offered or distributed by us (including but not limited to third party products such as insurance policies);
- d) to verify your financial standing through credit reference checks;
- e) to underwrite, establish and evaluate your creditworthiness;
- f) to enable us to consider whether to provide or continue to provide to you any of our products and services;
- g) to manage and maintain your account(s) and facility(ies) with us;
- h) to provide/send statements, mails, letters or other communications to you or to related parties, and update your personal information;
- i) to do data entry, to check the completeness and accuracy of customer data inputted into the system;
- j) to better manage our business and your relationship with us (including to the training provided to our staff);
- k) to authenticate you so that, among others, you can access digital/electronic accounts, to personalize your experience with our products and services; to monitor your access and membership with related third parties;
- l) to auto-enroll you on digital apps in order to manage your card and card account, including but not limitation to our mobile application, digital credit card statements, biometric authentication and biometric fraud detection solutions;
- m) to monitor and record calls and electronic communications with you and other related third parties;
- n) to undertake and comply with contractual arrangements between us and other parties;
- o) for reward redemption fulfillment, gift delivery, mile transfer redemption;
- p) to perform card/account/transaction suspension, blockage or closure;



- q) to better understand your current and future investment needs and your financial situation;
- r) to improve, enhance, personalize, and tailor our products and services including online services, and to develop new products and services;
- s) to administer offers, competitions, campaigns and promotions;
- t) to respond to your enquiries and complaints and to generally resolve disputes;
- u) to produce data, reports and statistics, responses, for ourselves or for our related third parties or upon requests from the State Bank of Vietnam, other competent authorities, or related third parties;
- v) to conduct market research, surveys and data analysis relating to any service or product provided by us (whether conducted by PBVN or jointly with another party) which may be relevant to you;
- w) for risk assessment, statistical, trend analysis and planning purposes, including to carry out data processing statistical, credit, risk and anti-money laundering analyses, to create and maintain credit scoring models, and review and maintain credit history of individuals;
- x) to provide information, offer and conduct marketing and promotion, to you any products, services, offers or events provided by us and our business partners which we think may be of interest to you;
- y) for audit, compliance and risk management purposes;
- z) to meet or comply with our internal policies and procedures and any applicable rules, laws, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (both national and international) (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
- aa) to assess any proposed acquisition, implement any acquisition or transfer of business and/or assets, transfer or assign our rights, interests an obligation under your agreement(s) with us;
- bb) to protect or enforce our rights, including to collect fees and charges and to recover any debt owing to us;
- cc) to maintain accurate KYC information, perform name search, verification, and conduct anti-money laundering, credit and background checks or other checks as required;
- dd) to detect, prevent, and investigate crime, offences, or breaches including fraud, money laundering, terrorist financing, and bribery;
- ee) for our suppliers/service providers/vendors;
- ff) for any other purpose that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities; and/or;

- gg) to undertake other activities in connection with our provision, operation, processing, and administration of products and services to you, or to serve other purposes that we deem appropriate from time to time;
- hh) CCTV footage, in particular, may also be used for the following purposes: (i) for quality assurance purposes; (ii) for public safety and the safety of our employees; (iii) detecting and deterring suspicious, inappropriate or unauthorized use of our facilities, products, services and/or premises; (iv) detecting and deterring criminal behavior; and/or (v) conducting incident investigations.

3. How we process and collect your personal data

- 3.1. As a Personal Data Controller cum Processor, PBVN may need to and/or may be required to collect, record, analyze, confirm, store, alter, disclose, combine, access, trace, retrieve, encrypt, decrypt, copy, share, transmit, provide, transfer, delete, destruct or conduct any other relevant activities on (i.e., “process”) personal data, which includes any data which relates directly or indirectly to you and/or your transactions with us.
- 3.2. We, and the data processor that we engage, may obtain these data from yourself when you apply for, or during the course of our provision to you of, any of our products and services, and from a variety of sources, including but not limited to:
 - a) through your relationship with us, for example information provided by you in application forms or supporting documents, when using our products or services, when taking part in customer surveys, competitions and promotions, and during financial reviews;
 - b) through your verbal and written communications with us and/or our authorized agents;
 - c) from our suppliers, service providers, partners, merchants and third parties, including but not limitation to survey, social media, marketing, credit reference, fraud prevention, data aggregating agencies, infrastructure and facilities support providers, and other third parties in connection with our business;
 - d) from third parties connected with you, such as employers, joint account holders, guarantors, security providers, co-partners, co-directors and co-shareholders;
 - e) from any credit reporting agencies, credit reference agencies and governmental agencies, or information obtained from any publicly available sources, directories, or registries;
 - f) from the State Bank of Vietnam or other competent authorities in Vietnam or overseas;
 - g) through recorded footage from Closed Circuit Televisions (CCTV) at our premises;
 - h) from an analysis of the way you use and manage your account(s)/facility(ies) with us, from the transactions you make and from the payment which are made to/from your account(s)/facility(ies);



- i) via cookies or other similar tracking devices/tools; and/or;
- j) from third party source, where you have consented to the collection, or where collection is required or permitted by law.

4. Organizations and individuals permitted to process personal data

In order to provide you with our products and services and to manage and/or operate the same, and/or to serve other purposes as described above, we may disclose your personal data or personal data of third parties related to you, to the following parties:

- a) companies and/or organizations within Public Bank Group;
- b) companies and/or organizations that act as our vendors, suppliers, partners, agents and/or professional advisers, including but not limitation to companies providing administrative, mailing, telemarketing, direct sales, call center, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference and other background checks, custodian, depository, plastic card, clerical, market research, data modelling, reward redemption, record storage and dossier management, data entry, pre-screening and verification, legal, network website or social media, telecommunication, SMS delivery or email delivery, network connection, telephone, infrastructure facilities and technology support, workforce management, risk reporting, credit decision, information security, software maintenance and license, data center, voice and conferencing, and advisory services, and/or other services in connection with, or support to, the operation of our business;
- c) your advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) where authorized by you;
- d) any person notified by you as authorized to give instructions or to use the account(s)/facility(ies) or products or services on your behalf; including your joint account holders;
- e) any actual or proposed assignee or other third party as a result of any restructuring of facilities granted to you or the sale of debts, or the acquisition or sale of any company or assets by us;
- f) the police or any public officer conducting an investigation in connection with any offence including suspected offences;
- g) any guarantors or security providers for the facility(ies) granted by us to you;
- h) any rating agency, insurer or insurance broker or direct or indirect provider of credit protection;



- i) any court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over us;
- j) the Credit Information Center of Vietnam or any other authority or body established by the State Bank of Vietnam or any other authority having jurisdiction over us;
- k) any credit reporting agencies or credit reference agencies;
- l) any credit institutions, foreign bank agencies and branches, financial institutions, merchants, VISA International Services Association, MasterCard International Incorporated, and other card associations in relation to any products and services provided to you by us;
- m) any person, authorities or regulators or third parties to whom we are permitted or required to disclose to under the laws of any country, or under any contractual or other commitment between third party and us;
- n) any person intending to settle any moneys outstanding under any of your account(s) with us; and/or;
- o) any person connected to the enforcement or preservation of any of our rights under your agreement(s) with us or otherwise,

5. The Bank's security assurance

There might be undesirable fraudulent/unauthorized or accidental access/processing happening while your personal data is processed. In order to protect your personal data against online fraud, you must ensure that you do not knowingly or accidentally share, provide or facilitate unauthorized of your personal identification User ID and password. The Bank shall also strive at all times to hedge the possible risks, safeguard and secure your personal data.

- a) The Bank is committed to secure your personal data by implementing adequate and stringent security controls, measures and protocols in line with existing the Bank's regulations, industry practices and legal requirements to protect your personal information against any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration or destruction.
- b) To achieve this objective, regular reviews of the risks to personal information would be conducted and any security flaws or weaknesses identified would be promptly addressed and rectified.
- c) We employ security measures regardless of the media on which information is stored (paper, computer disks, etc.), the systems which process it (microcomputers, mainframes, voice mail systems, etc.), or the methods by which it is moved (electronic mail, face-to-face conversation, etc.). Such protection includes restricting access to information on a need-to-

know basis. The Bank devotes sufficient time and resources to ensure that information is properly protected.

- d) As a source of reference for the Bank's information security needs, information security policies, standards and procedures are fully documented and maintained. All employees, including new recruits, are educated as to their obligations with regard to your personal information. Consultants or other external parties contracted to carry out work for the Bank must also conform to these requirements and where appropriate, are also bound by non-disclosure agreements to ensure the confidentiality of the Bank's information assets.

6. Starting and ending time to process personal data

The processing of personal data may begin when your take-up or upon signing up or depending on how you access and use our products and services.

We will retain your personal data for such period or duration as required by your relationship with us, in compliance with this T&C and/or the terms and conditions of your agreement(s) with us, for such other period as may be necessary to serve the interests of PBB Group and/or its customers, or where otherwise required by the law and/or by PBB Group's relevant policies, or for such other period where the purposes for which your personal data was collected remain valid.

7. Your Rights and obligations relating to your personal data

7.1. As a customer, you can exercise the following rights:

- a) You can request to access, correct and be provided with your personal data held by us;
- b) You may object, lodge your complaint, or exercise your self-protection in case of the Bank's processing your personal data not in conformity with this T&C.
- c) Other rights as stipulated in prevailing applicable laws;

7.2. As a customer, you are to perform the following obligations:

- a) To fully and accurately provide your personal data and keep your personal data up to date to the Bank when you consent to use products and services of PBVN. In order to keep your records be updated promptly, you could inform us in writing of any changes relating to your personal data;
- b) To protect your own personal data when using our products and services by complying with the security measures designed to protect your personal identification numbers and passwords by keeping it secret and confidential. These are set out in the terms and



conditions of your account. You may be able to limit your liability for unauthorized use of your account if you observe these requirements;

- c) To comply with relevant regulations on personal data protections and actively participate in preventing violations against personal data protection.

8. The Bank's Rights and Obligations relating to your personal data

8.1. PBVN can exercise the following rights:

- a) To reserve the right to charge a reasonable fee for the processing of any data access request;
- b) To be permitted to provide your personal data to other organizations and individuals as per your consent or on your behalf as per your approval and authorization, unless otherwise regulated by law;
- c) To withhold access to your personal data in certain situations regulated by laws;
- d) To provide and process your personal data to/with other relevant parties stated in Part 3.2 and 4 of this T&C to perform the obligations and operations related to the provisions of products and services you have registered with the Bank;
- e) In case you withdraw consent, PBVN is entitled to proactively contact and request the Data Processor/Third Party to stop processing of your personal data at any time which PBVN deems fit; according to the PBVN's and/or the Data Processor's and/or Third Party's processes, procedures and responsiveness of the technical infrastructure from time to time. In case the withdrawal of consent cannot be accommodated due to technical factors or the responsiveness of the infrastructure, PBVN is exempted from all obligations and responsibilities related to this request for withdrawal of your consent.
- f) To exempt PBVN from all obligations and responsibilities for the possible risks arising in the progress of personal data processing, which include but not limit the loss of data due to system error or other objective reasons out of PBVN's control.

8.2. PBVN is to perform the following obligations:

- a) To take all practicable and reasonable steps to ensure that your personal information is accurate, complete and up-to-date;
- b) We will use reasonable efforts to comply with your request to access or correct your personal data within 72 hours of receiving your duly completed and proper request and the relevant processing fee (if any), subject to our right to rely on any statutory exemptions and/or exceptions.
- c) To comply with relevant prevailing regulations on protection of personal data



9. Changes to this T&C

This T&C may be revised from time to time. Notice of any amendment of and supplement to or revision to PBVN's T&C will be given on our website and/or by such other means of communication deemed suitable by us. If you do not agree with such amendments, supplements, and revisions to PBVN's T&C, you may terminate the utilization of the services you are using at the Bank.