



TDI APJ VIETNAM COMPANY LIMITED

PRIVACY POLICY FOR CANDIDATES

1. GENERAL PROVISIONS

The purpose of this Privacy Policy for Candidates is to outline how the Company protects the candidate's data in accordance with the Company's policies, the provisions of Vietnamese law on personal data protection, and all applicable laws relating to privacy and personal data protection of Vietnam ("**Privacy Laws**").

In accordance with the Government's Decree No. 13/2023/ND-CP on the Protection of Personal Data, the Company would like to inform the Candidates of the Privacy Policy for Candidates.

2. DEFINITION OF TERMS

- 2.1. "**Personal Data**" refers to electronic information in the form of symbols, letters, numbers, images, sounds, or in a similar form in the electronic environment which is associated with an individual or used to identify an individual. Personal Data includes Basic Personal Data and Sensitive Personal Data.
- 2.2. "**Basic Personal Data**" includes: a) Last name, middle name and first name as stated in the birth certificate, other names (if any); b) Date of birth; date of death or missing; c) Gender; d) Place of birth, place of birth registration; place of permanent residence; place of temporary residence; current place of residence; hometown; contact address; e) Nationality; f) Personal image; g) Phone number; ID Card number, personal identification number, passport number, driver's license number, license plate number, taxpayer identification number, social insurance number and health insurance card number; h) Marital status; i) Information about the individual's family relationship (parents, children); k) Digital account information; personal data that reflects activities and activity history in cyberspace; l) Information associated with a specific individual or helping identify a specific individual other than Sensitive Personal Data.
- 2.3. "**Sensitive Personal Data**" refers to personal data in association with an individual's privacy which, when being infringed, shall cause a direct effect on the legitimate rights and interests of such individual, including: a) Political and religious views; b) Health status and privacy stated in medical records, excluding information on blood type; c) Information about racial or ethnic origin; d) Information related to an individual's inherited or acquired genetic characteristics; e) Information about an individual's physical attributes and biological characteristics; f) Information about an individual's sex life or sexual orientation; g) Data on crimes and criminal acts collected and stored by law enforcement agencies; h) Information on clients of credit institutions, foreign bank branches, intermediary payment service providers and other licensed institutions, including: information on client identification as prescribed by law, information on accounts, information on deposits, information on deposited assets, information on transactions, information on organizations and individuals that are securing parties at credit institutions, bank branches, and intermediary payment service providers; i) Personal position identified via positioning services; k) Other specific personal data defined by law as specific data that requires necessary protection measures.
- 2.4. "**Data Subject**" refers to an individual identified by personal data.



- 2.5. **“Candidate”** refers to all individuals seeking employment and applying for positions within the Company.
- 2.6. **“Personal Data Processing”** or **“Data Processing”** refers to one or multiple activities that impact on personal data, including collection, recording, analysis, certification, storage, rectification, publicizing, combination, access, retrieval, withdrawal, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction of personal data or other relevant activities.
- 2.7. **“Company”** or **“we”** or **“us”** refers to **TDI APJ Vietnam Co. Ltd.** or **TDI APJ Group** and its members located outside of Vietnam, with the following information:

TDI APJ Vietnam Co., Ltd., is an enterprise incorporated under the laws of Vietnam, Enterprise Registration Certificate No. 0311486135, issued by the Department of Planning and Investment of Ho Chi Minh City, with office address 131 Xo Viet Nghe Tinh Street, Gia Dinh Ward, Ho Chi Minh City, Vietnam.

TDI APJ Pte. Ltd., our parent company, is an enterprise incorporated under the laws of Singapore, Establishment License No. 201923453R issued by Accounting and Corporate Regulatory Authority (ACRA), with office address at One Raffles Quay, North Tower Level 49, #49-01, Singapore.

TDI APJ Malaysia Sdn. Bhd., is an enterprise incorporated under the laws of Malaysia, Establishment License No. 201201018698(1004211-X) issued by Suruhanjaya Syarikat Malaysia (SSM), with office address at Level 3, Menara AIA Sentral, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia.

- 2.8. **“Data Protection Officer (DPO)”** means one or more individuals the Company designates to ensure that the Company complies with the provisions of Privacy Laws.

3. TYPES OF PERSONAL DATA COLLECTED AND METHOD OF COLLECTING PERSONAL DATA

- 3.1. In order for the Company to be able to conduct recruitment activities, the Company and/or a data processor authorized by the Company may need to and/or be required to collect Personal Data, including (i) Basic Personal Data and (ii) Sensitive Personal Data relating to Candidates and Candidates’ Dependents.

Personal Data that may be collected and processed are the types of information listed below and are subject to change from time to time:

- (a) Basic Personal Data includes Full name, middle and birth name; Date, month, year of birth; Gender; Place of temporary residence; Current place of residence; Contact address; Nationality; Images of individuals; Phone number; Marital status; and other related information;
- (b) Information about education, work history, and professional experience (including references), contact details, and other information that the Candidate voluntarily provides through their CV/resume or application form; and information demonstrating the Candidate's suitability for the position applied for.

Note: When the Candidate provides personal data of any Third Party to us (such as family members, referees/former supervisors), the Candidate represents and warrants that they have obtained the necessary consent or permission from those Third Parties to share and



transfer their personal data to us for processing in accordance with this Policy.

- (c) In the event that the Candidate is invited to participate in tests or competency assessments as required for the recruitment position or depending on the nature of the position, "Personal Data" also includes information provided by the Candidate during the testing process or in responses, assessment results, as well as the final outcomes of the Candidate, scores, and characteristics of the personal profile, including personality traits and soft skills (such as teamwork, creativity, decisiveness, reliability, adaptability), reasonable skills, performance, language proficiency, level of understanding, including recordings or footage (which the Candidate has been informed about and consented to recording and filming) or other related information
 - (d) The opinions and comments of the Interviewer during the recruitment process.
 - (e) Recruitment information (including copies of employment rights documents, references and other information contained in the CV or cover letter or as part of the job application process); and
 - (f) Any other information in the Company's possession in relation to the Candidate.
- 3.2. The Company and/or a data processor authorized by the Company, may collect the Candidate's Personal Data in the following ways:
- (a) Directly provided by the Candidate;
 - (b) Publicly posted by Candidates through profiles created on job-related social media platforms and job boards (such as LinkedIn, Anphabe, or Facebook);
 - (c) Provided by third parties, such as recruitment agencies, or former employers of the Candidate, and credit reference agencies with the consent of the Candidate; and
 - (d) From the CCTV used within the premises of the Company.

4. DATA PROCESSING

4.1. Data Processing Purposes

The Company will/may collect, use, disclose, and/or process Candidate's Personal Data for one or more of the following purposes:

- (a) Candidate assessment for recruitment into positions at the Company from time to time:
 - (i) Making hiring or other employment-related decisions (including work history, reference checks, academic history, criminal record checks, or further specific background checks as required); providing Candidate references and for background screening/vetting;
 - (ii) Determining the suitability, eligibility, or qualifications for recruitment of the Company;
 - (iii) Managing Candidates' benefits; managing and maintaining digital accounts and other Candidate records when employed by the Company;



- (b) Contacting/communicating with the Candidates to discuss their applications at the Company according to the recruitment process from time to time;
- (c) Informing Candidates about job opportunities that match their Personal Data and where the Company believes the Candidate may be interested in the future;
- (d) Fulfilling the rights and obligations of the Company arising from any contracts, agreements signed between the Company and the Candidate, if any.

4.2. Methods of Processing Personal Data

From time to time and depending on each of the above purposes, the Company and/or the data processor authorized by the Company may perform one or several activities that impact on personal data, including collection, recording, analysis, certification, storage, rectification, publicizing, combination, access, retrieval, withdrawal, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction of Personal Data or other relevant activities.

The Personal Data Processing activities may be performed by the Company in an automatic or non-automatic manner, by electronic means or by manual means or by any other means that the Company and/or the data processor authorized by the Company deem appropriate.

5. OUTBOUND TRANSFERS OF PERSONAL DATA

5.1. Purposes of Outbound Transfers of Personal Data

The Company will/may transfer Personal Data of Candidates abroad for one or more of the following purposes:

- (a) Managing Candidate's information and the recruitment process; and
- (b) Other purposes will be specifically notified as necessary.

5.2. Methods of Outbound Transfers of Personal Data

From time to time and depending on each of the above purposes, the Company may carry out the transfer of personal data by electronic means or by manual means or by any other means that the Company deems appropriate.

6. PARTIES INVOLVED IN THE PROCESSING OF PERSONAL DATA

6.1. Organizations and individuals that are allowed to process personal data include the Company and related organizations and individuals as follows:

- (a) Employees of the Company that are involved in the recruitment process;
- (b) The Company's affiliates;
- (c) The professional advisors (*such as auditors and attorneys*) of the Company or any of the Company's affiliates;
- (d) Recruitment agencies;



- (e) Any assignee or possible assignee of the rights and obligations of the Company or any of its affiliates;
- (f) Third-parties seeking Candidate references in respect of former Candidates of the Company; and
- (g) Individuals, authorities or regulatory bodies or third parties to whom the Company is permitted or required by law to disclose.

6.2. When disclosing the Candidate's Personal Data to third parties, the Company ensures that the third parties will secure the Candidate's Personal Data from unauthorized access, collection, use, disclosure, processing of data information or similar risks and retain the Candidate's Personal Data only for the period necessary to achieve the purposes mentioned above.

7. START TIME AND END TIME OF PERSONAL DATA PROCESSING

7.1. Data processing's start time:

The Company will start processing personal data from the time of receiving personal data.

7.2. Data processing's end time:

Until the completion of the purposes which are regulated in Article 4.1 and Article 5.1 or until necessary to comply with statutory obligations and to resolve any dispute or until the information provided is requested to be deleted by the Candidate.

8. DATA SUBJECT'S RIGHTS AND OBLIGATIONS

8.1. **Data Subject's Rights**

Under Privacy Laws, as a Data Subject, the Data Subject has the following rights:

(a) ***Right to be informed***

The Data Subject has the right to be informed of the processing of the Personal Data, unless otherwise provided by law. Accordingly, the Company provides the notice to the Data Subject with the information contained in this Privacy Policy.

(b) ***Right to give consent***

The Data Subject has the right to consent or not to consent to the processing of the Personal Data, except as provided in Article 9 of this Privacy Policy.

The Data Subject may consent to part or all contents of this Privacy Policy. In case of partial consent, please kindly contact the Data Protection Officer.

(c) Right to access; right to withdraw consent; right to delete personal data; right to restrict data processing; right to obtain personal data; right to object to data processing; right to file complaints, denunciations and lawsuits and other rights according to Privacy Laws.

When a Data Subject wishes to access and/or correct or delete their Personal Data currently in the possession or control by the Company, in order to be able to respond to the Data Subject's request,



the Company will need to have full and sufficient information of the Data Subject to determine the identity as well as the nature of the Data Subject 's request.

In the event that the Data Subject withdraws its consent, requests data deletion and/or exercises other relevant rights with respect to any or all of the Data Subject's personal data. The acts performed by the Data Subject in accordance with these regulations may mean that the Company cannot fully perform the contract that the Company has signed with the Data Subject (such as payment to the Data Subject or providing benefits), or the Company may be impeded from complying with its legal obligations (such as serving the services to Customers). This may affect the relationship between the Data Subject and the Company.

Please contact our Data Protection Officer as set forth in **Section 12. HOW TO CONTACT US** below.

8.2. **Data Subject's Obligations**

When the Data Subject consents to the processing, he/she shall fully and accurately provide his/her Personal Data according to the Privacy Laws.

9. **PERSONAL DATA PROCESSING WITHOUT THE CONSENT OF DATA SUBJECT**

Personal Data may be processed without the consent of the Candidate – as a Data Subject – as required by law in the following cases:

- (a) In urgent cases requiring immediate processing of relevant Personal Data to protect the life and health of the Candidate or others.
- (b) When Personal Data is required to be publicly disclosed in accordance with the law.
- (c) When Personal Data is processed by competent state agencies in cases of urgent situations related to national defense, national security, social order and safety, major disaster, dangerous epidemic, or when there is a risk of threatening security and national defense but the situation has not reached the level of declaring a state of emergency; to prevent and combat riots and terrorism, to prevent and combat crimes and law violations as prescribed by the law.
- (d) To perform the Candidate's contractual obligations with relevant agencies, organizations and individuals in accordance with the law.
- (e) To serve the activities of state agencies as prescribed by specialized laws.

10. **PROTECTION OF PERSONAL DATA**

- 10.1. Understanding the importance of personal data protection, the Company will regularly review and update management and technical measures when processing Candidate's personal data.
- 10.2. To the best of our ability, access to Candidate's Personal Data is limited to those who need to know. Individuals with access to data are required to maintain the confidentiality of such information.
- 10.3. The Company will use encryption, secure storage, and restrict access to data, which will be implemented.



11. UNDESIRABLE CONSEQUENCES AND DAMAGE THAT MAY OCCUR

- 11.1. Although the Company will do its best to protect Candidate's Personal Data, the transmission, and storage of information is, however, vulnerable to unauthorized third-party activity. Some undesirable consequences and damages may include, but are not limited to:
- (a) Hardware and software failures in the data processing that cause data loss of service providers;
 - (b) Security hole beyond our control, system attacked by a third-party causing data leakage;
 - (c) The service provider arbitrarily discloses personal data due to carelessness or fraud; access to websites/download apps that contain malware...
- 11.2. In the limited undesirable event, if an incident or violation is detected with respect to personal data, the Company will proceed to notify relevant parties of the incident/breach within a statutory period, and at the same time will make efforts to overcome and minimize the consequences and damage within the Company's ability and in accordance with applicable laws:
- (a) The Company must immediately report the data breach to the DPO and senior management.
 - (b) A data breach response plan will be developed and implemented to mitigate harm and notify affected Data Subjects.
 - (c) The Company must notify the relevant authorities within 72 hours of becoming aware of the breach as the statutory period.

12. HOW TO CONTACT US

If the Candidate wishes to exercise their rights, has any questions, complaints or grievances, or comments regarding this Privacy Policy for Candidates and/or our processing of Candidate's personal data, please contact our Data Protection Officer at:

Address: Unit 901, 131 Xo Viet Nghe Tinh Street, Gia Dinh Ward, Ho Chi Minh City, Vietnam

Attn: Department in charge of Data Protection

Email: dpo@tdiapj.com

13. AMENDMENT AND SUPPLEMENTS OF POLICY

The Company reserves the right to update this Privacy Policy for Candidates from time to time if necessary.

Effective Date: 01/01/2026 (update as of 26/3/2026)