



TDI APJ VIETNAM COMPANY LIMITED

PRIVACY POLICY

1. GENERAL PROVISIONS

In accordance with the Government's Law No. 91/2025/QH15 and Decree No. 13/2023/ND-CP on the Protection of Personal Data, amended, supplemented or replaced from time to time ("**Privacy Laws**"), the Company would like to inform this Privacy Policy to the Visitors, Business Partners, Customers, Suppliers as individuals, Employee and Dependent's data (collectively called the "**Data Subject**").

The Data Subject is kindly requested to read carefully and allow the Company to collect and process Personal Data within the scope, purposes, and methods of processing clearly outlined below.

2. DEFINITION OF TERMS

- 2.1. "**Personal Data**" refers to digital data or information in other forms that identifies, or helps identify an individual. Personal Data includes Basic Personal Data and Sensitive Personal Data. Once personal data has been de-identified, it is no longer considered personal data.
- 2.2. "**Basic Personal Data**" is personal data that reflects identifying characteristics and general background information, commonly and regularly used in transactions and social interactions. 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; dd) Nationality; e) 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 help identify a specific individual other than Sensitive Personal Data. The list of Basic Personal Data may vary depending on the list issued by the Government.
- 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 agencies, organizations, or individuals, 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) 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. The list of Sensitive Personal Data may vary depending on the list issued by the Government.

- 2.4. **"Data Subject"** refers to an individual identified by Personal Data.
- 2.5. **"Visitor"** refers to any individual who accesses or uses our websites, whether directly or indirectly, including but not limited to browsing content, submitting inquiries, or using any interactive features provided by our websites.
- 2.6. **"Business Partner"** refers to any individual, company, organization, or legal entity that has established a business cooperation relationship with us.
- 2.7. **"Customer"** refers to any individual, company, organization, or legal entity that uses our products or services.
- 2.8. **"Supplier"** refers to any individual, company, or organization that provides goods, services, technology, or other forms of support to us, whether under contract, purchase order, or any other formal or informal agreement.
- 2.9. **"Employee"** refers to all individuals who are, or were employed by the Company, including Chief of Representative Office or other management positions, employees, interns, trainees for positions within the Company, former employees of the Company.
- 2.10. **"Dependents"** include parents, wife or husband, children and other individuals related to the Employee that the Employee provides the Personal Data to the Company by the Employee.
- 2.11. **"Personal Data Processing"** or **"Data Processing"** refers to one or multiple activities that impact on personal data, including collection, analysis, aggregation, encryption, decryption, modification, deletion, destruction, de-identification, provision, disclosure, transfer of Personal Data, and other activities affecting personal data.
- 2.12. **"Company"** or **"us"** or **"we"** is **TDI APJ Vietnam Co. Ltd.** or **TDI APJ Group** and its subsidiaries 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 at 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.
- 2.13. **"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

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 of Business Partners, Customers, and Suppliers that are individuals, including but not limited to: First name, middle name, and surname; Other names (if any); Date of birth; Gender; Place of birth; Nationality; Contact address; Phone number; Personal identification documents of the Data Subject; Personal tax identification number; Information about personal account numbers.
- (b) Basic Personal Data and certain Sensitive Personal Data of Employees and Dependents, including but not limited to: Medical data, health records (excluding blood type information); Ethnic origin; Information about the Employee's bank account. Additionally, the Company may collect images and other visual materials, footage from security cameras, and other information obtained through electronic means such as attendance data; images, recordings, and footage captured of the Employee during work or while participating in Company activities.
- (c) Basic Personal Data and including certain Sensitive Personal Data of Visitor on a case-by-case basis, including but not limited to: First name, middle name, and surname; Contact information including email address; Other information relevant to customer surveys and/or offers.

4. DATA PROCESSING

4.1. Data Processing Purposes

❖ For Business Partners, Customers, and Suppliers are individuals

The Company will/may collect, use, disclose, and/or process the Personal Data of the Business Partners, Customers, and Suppliers are individuals for one or more of the following purposes:

- (a) To provide the Company's services and fulfill the commitments to Partners and Customers;
- (b) To utilize services provided by individual Suppliers to the Company;
- (c) To carry out specific business cooperation plans with Partners.
- (d) Complying with legal and regulatory requirements.

The purposes (a), (b), (c), and (d) are collectively referred to as **"To perform scope of services of the Contract"**.

- (e) For direct marketing purposes:

Where the Data Subject agrees, the Company may market, advertise, and introduce products to improve the serving quality according to the content, form, and frequency as follows:



- (i) Content: Marketing and introducing advertising products of the Parent Company and its partners.
- (ii) Method: Via advertising messages, announcements on the Company's website, or other methods as prescribed by law.
- (iii) Form: The Company may/will send the Data Subject via email, postal mail, or other means of communication the marketing and promotional information and materials related to the products and/or services of the Company or a partner of the Company, whether such products or services are currently available or will be created in the future.
- (iv) Frequency: According to the law on advertising.

In addition to the above provisions, the Company is responsible for complying with the provisions of the law on advertising.

❖ For Employee and Dependents

- (a) To manage labor and personnel policies, as well as benefits for Employees and their Dependents.
- (b) To communicate with the Employee:
 - (i) Internal communication on work-related matters;
 - (ii) Contact the Employee or communicate with the Employee by phone/voice call, text message and/or fax message, email and/or postal mail. The Employee acknowledges and agrees that such communication by us could be by way of the mailing of correspondence, documents or notices to the Employee, which may involve disclosing certain personal data about the Employee to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- (c) To carry out the Company's business activities and other related activities;
- (d) To implement the Company's publications, marketing campaigns, and events;
- (e) To comply with legal requirements and regulations.

❖ For Visitors

- (a) To enhance Visitors' experience as well as the quality of our products and services;
- (b) To allow the Company to introduce and recommend new products, special offers, or other information that we believe may be of interest to Visitors;
- (c) To process any complaints or inquiries related to the Company's products and services.

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, analysis, aggregation, encryption, decryption, modification, deletion,



destruction, de-identification, provision, disclosure, transfer of Personal Data, and other activities affecting personal data.

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 the Personal Data abroad for one or more of the following purposes:

- (a) Managing of Company's business operations;
- (b) Managing of the Employee and overseeing the implementation of the Company's policies and regulations related to the Employee;
- (c) Applying a whistleblowing policy;
- (d) Reviewing and approving business cooperation contract, commercial contracts, labor contracts and other; and
- (e) Serving business activities or other management activities of the Company.

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, 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;
- (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) Credit institutions, intermediary payment service providers;
- (e) Agents, contractors, or third-party service providers who provide services such as telecommunications, transportation, accommodation, recruitment, tourism, translation, cleaning, insurance, healthcare, information technology, equipment leasing, data processing, payment, payroll, training, storage for the Company or any of its affiliates;
- (f) Any business partner, investor, assignee or transferee (actual or potential) to facilitate



business asset transactions (which may extend to any acquisition, merger, or sale of assets) involving the Company or any of its affiliates;

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

6.2. When disclosing the Data Subject's Personal Data to third parties, the Company ensures that the third parties will secure the Data Subject's Personal from unauthorized access, collection, use, disclosure, processing of data information or similar risks and retain the Data Subject's Personal 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 regulated in this Privacy Policy 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 Data Subject.

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 about the processing of personal data***

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 or to refuse or request the withdrawal of consent for the processing of personal data***

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.

The Data Subject has the right to request the withdrawal of consent for the processing of



their personal data and to request a restriction on the processing of their personal data if there are doubts regarding the scope, purpose of processing, or the accuracy of the personal data, except as provided in Article 9 of this Personal Data Protection Policy.

Requests for withdrawal of consent or restriction of personal data processing by the Data Subject must be made in writing, including electronic form or in a verifiable format.

Note: When the Employee provides personal data of their Dependents, the Employee represents and warrants that they have obtained the necessary consent or permission from those Dependents to share and transfer their Personal Data to us for processing in accordance with this Policy.

- (c) The Data Subject has the right to access; modify, or request the modification of personal data; to request the provision, deletion, or restriction of the processing of personal data; to submit an objection to the processing of personal data; to file complaints, denunciations, initiate lawsuits, or claim compensation in accordance with the law; and to request competent authorities or relevant agencies, organizations, or individuals involved in personal data processing to implement measures or solutions to protect their personal data in accordance with legal regulations and other rights according to Privacy Laws.

When an Data Subject wishes to access, modify, or request the modification or delete, restrict the processing of 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 requests the withdrawal of consent for the processing of personal data, requests data deletion, restriction 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.

The deletion or destruction of personal data shall only be carried out in cases as prescribed by the Personal Data Protection Law. The Company will not fulfill any request for deletion or destruction of personal data in the circumstances set out in Article 9 of this Personal Data Protection Policy or in cases where such requests violate the provisions of the Privacy Laws.

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

8.2. Data Subject's Obligations

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

9. PERSONAL DATA PROCESSING WITHOUT THE CONSENT OF DATA SUBJECT

- 9.1. Personal Data may be processed without the consent of the 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, health, honor, dignity, rights, and lawful interests of the Data Subject or others.
- (b) To protect the legitimate rights or interests of the Company, or the interests of the State or organizations, as necessary in response to acts that infringe upon the interests specified in point (a) of this Article.
- (c) To address emergency situations; when there is a risk of threatening security and national defense but the situation has not to reach 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 Data Subject's contractual obligations with relevant agencies, organizations and individuals in accordance with the law.
- (e) Personal data obtained from audio or video recordings in public places or during public activities, including conferences, seminars, sports competitions, artistic performances, and other public events, provided that such activities do not harm the honor, dignity, or reputation of the data subject.
- (f) Other cases as prescribed by the Privacy Laws.

9.2. The Company shall establish a monitoring mechanism when processing personal data in cases where the data subject's consent is not required, including:

- (a) Establishing a personal data processing procedure and defining the Company's responsibilities during the processing of personal data.
- (b) Implementing appropriate personal data protection measures and regularly assessing potential risks during the processing of personal data.
- (c) Conducting regular inspections and assessments to ensure compliance with legal regulations, internal procedures, and rules on personal data processing.
- (d) Developing a mechanism to receive and address feedback and recommendations from relevant authorities, organizations, and individuals.

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 Data Subject's personal data.

10.2. To the best of our ability, access to Data Subject'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 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 business partners, vendors arbitrarily disclose 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 Data Subject wishes to exercise their rights, has any questions, complaints or grievances, or comments regarding this Privacy Policy and/or our processing of 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 from time to time if necessary.

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