

# Privacy Policy

## PRIVACY POLICY

Vision & Associates, including its subsidiaries and affiliates such as Vision & Associates Legal (hereafter referred to as "**V&A**" or "**We**" or "**Us**"), issues and applies this Privacy Policy (hereafter referred to as "**Policy**") for individuals with whom We interact, including clients, client personnel, V&A personnel (including collaborators, contractors who work as employees, interns, outsourced workers, and other staff), relevant third parties, suppliers, and individuals who access our website (hereafter referred to as "**You**" or "**Data Subject**").

This Policy outlines how We handle your Personal Data or data provided by You ("**Personal Data**"), including its collection, analysis, storage, modification, evaluation, processing, usage, encoding, decryption, copying, transmission, provision, sharing, transfer, deletion, destruction, and other related actions (hereafter referred to as "**Process**", "**Processing**", or "**Processed**") in accordance with applicable laws, regulations, data protection norms, and privacy rights standards.

This Policy applies to your usage (or ability to use) of any services We provide or any relationship (present or potential) established between You and Us.

This Policy can be amended or updated from time to time to reflect changes in our Personal Data processing practices or changes in legislation.

## I. TYPES OF PERSONAL DATA BEING PROCESSED

Personal Data provided by You or your authorized relevant third party covers both general personal data and sensitive personal data, including:

- Identification information such as full name, data of birth, gender, nationality, ID card number/ PI number or passport number, date of issue, place of issue, photo of ID card or passport, tax code, social insurance number, and health insurance number;
- Information relating to ethnic, racial origin (sensitive Personal Data); marriage status, family relationship, information relating to relatives and dependents;
- Health status, occupational diseases and documents from medical examination and treatment facilities;
- Contact information such as phone number, email address, resident address, contact address;
- Bank account information; and
- Other information which aims to provide or perform contractual rights and obligations relevant to applicable laws.

These types of Personal Data are Processed either manually on paper and/or electronically, using methods that We and our authorized third parties consider to be compatible with the purposes outlined below.

## **II. PURPOSES OF PROCESSING**

We Process Personal Data belonging to You or provided by You for the following purposes:

- Provision of services, including legal services, provision of legal news, other services established under contracts or requests;
- Performance of rights and obligations under contracts signed with You, obligations under our commitments;
- Establishing, performing and protecting our legal rights and obligations;
- Contacting You for provision of services and information about services, including no-chargeable services;
- Compliance with applicable provisions of law from time to time; and

- Other lawful purpose in accordance with the laws.

### **III. STORAGE DURATION**

We implement suitable measures to ensure that your Personal Data is Processed only for the duration necessary to fulfill the purposes outlined herein (including the provision of services, upon your request) or as required by laws (including the retention periods stipulated by laws for Us and our service providers), whichever duration is longer.

We start to process Personal Data upon your consent and provision of such Personal Data, and We delete Personal Data under the following circumstances:

(a) the purpose of processing Personal Data, as consented by You, is fulfilled or when storing Personal Data is no longer necessary to our operation, except where required by law or requested by competent authorities;

(b) V&A ceases to exist or operate, declares bankruptcy or terminates its activities according to the provisions of law.

### **IV. OTHER ORGANIZATIONS, INDIVIDUALS AUTHORIZED TO PROCESS PERSONAL DATA OR RELATING TO PURPOSE OF PROCESSING**

Your Personal Data shall not be shared with any external third parties beyond V&A, except with authorized service providers essential for processing this data to fulfill requested services or with other third parties as permitted or required by applicable laws and regulations.

Specially, We may share Personal Data under our control or being processed with the following parties:

- **Our lawyers, legal consultants, and staff:** your Personal Data can be shared to certain lawyers and staffs whom are designated to perform tasks relating to the Processing of Personal Data (for example: contacting, transacting, consulting, drafting contract, evaluating

benefited amount, filling documents containing information, etc.);

- **Third parties providing services:** your Personal Data can be shared to third-party service providers, for example: providing bank account information to make payments, store on the cloud computing system, etc.;
- **Competent authorities:** your Personal Data can be shared to competent authorities or other competent agencies to comply with provisions of applicable law from time to time, including foreign legislation; and
- **Other parties that You agree:** your Personal Data can be shared with other parties with your consent. For example: sharing your contact information to third parties to assess our services quality.

## **V. CROSS-BORDER TRANSFER OF PERSONAL DATA**

Since all Personal Data relating to our staff, clients, and partners is processed by our firm's data processing system, your Personal Data may also be stored and transferred to our locations and those of our service providers, whether within or outside of Vietnam, if necessary.

If transferring Personal Data abroad, We will comply with compulsory procedures and requirements in accordance with applicable laws from time to time.

## **VI. PROCESSING PERSONAL DATA OF CHILDREN**

We do not actively process Personal Data of children unless required to fulfill our obligations. If You provide Us with Personal Data of children, You are responsible for ensuring that the rights of children are fully respected in accordance with the prevailing Vietnamese law prior to providing us with Personal Data of children, for example, the consent of children and their parents or guardian is required in the case of processing children's Personal Data who is older than 7

years old, unless otherwise provided by laws. If You have reason to believe that a child has provided Us with Personal Data or that Personal Data of a child has been provided to Us without being permitted by laws, please contact us using the information provided in **Section IX** below.

## **VII. PERSONAL DATA SECURITY**

We adopt appropriate and necessary organizational, technical and administrative measures to safeguard the Personal Data under our control and Processing. While We strive to ensure the utmost protection during data transfer and delivery, You should understand that We cannot guarantee 100% security against cyber incidents or data breaches. In case incident occurs, We will handle incidents most efficiently to mitigate damages and fulfill our obligations according to the applicable law. Please note that third-party Personal Data collection may not have the same level of protection as the Personal Data provided by You, and We cannot guarantee the confidentiality of such data.

## **VIII. YOUR RIGHTS AND OBLIGATIONS**

### **(a) Rights of Data Subject**

Depending on applicable law from time to time, You have the rights and obligations relating to your Personal Data processing, including but not limited to:

(i) Right to know: You have the right to know your Personal Data processing, unless otherwise provided by laws;

(ii) Right to consent: You have the right to consent or decline our processing of your Personal Data, unless otherwise provided by laws;

(iii) Right to access: You have the right to access, view, modify, or request correction of your Personal Data, unless otherwise provided by laws;

(iv) Right to request re-examination, correction, update and modification: You have the right to request Us to re-examine, correct, update, modify your Personal Data under our control or processing;

(v) Right to revoke consent: You have the right to revoke your consent, unless otherwise provided by laws;

(vi) Right to deletion of Personal Data: You have the right to request us to delete your Personal Data that We are controlling or processing, unless otherwise provided by laws;

(vii) Right to restriction: You have the right to obtain restriction on the processing of your Personal Data, unless otherwise provided by laws;

(viii) Right to obtain Personal Data: You have the right to request us to provide You with your Personal Data that We are controlling or processing, unless otherwise provided by laws;

(ix) Right to objection: You have the right to object to your Personal Data processing to prevent or limit the disclosure of Personal Data or using it for promotion purpose, unless otherwise provided by laws;

(x) Right to self-protection, filing complaint, denunciations and lawsuits: You have the right to self-protection, filing complaint, denunciations, lawsuit according to the law; and

(xi) Other rights according to applicable laws from time to time.

If You wish to exercise any of these rights, or if You have any inquiries regarding these rights or any section of this Policy, or your Personal Data Processing, please reach out to Us using the contact details provided in **Section IX** below.

## **(b) Obligations of Data Subject**

When You provide Us with Personal Data for Processing as per

this Policy, You shall are subject to the following obligations, including but not limited to:

(i) Self-protection of your Personal Data, request other relevant organizations, individuals to protect your Personal Data;

(ii) Respect and protect Personal Data of others;

(iii) Fully and accurately provide Personal Data upon consent to processing of Personal Data, ensure the accuracy of the provided Personal Data and promptly notify Us about any changes to your provided Personal Data;

(iv) Comply with all requirement applied to your provision of Personal Data in accordance with the laws; and

(v) Comply with regulations on Personal Data protection and participate in prevention against violations of regulations on Personal Data protection.

**(c) Right and obligation of the Data Controller, Data Controller-cum-Processor, representative of Data Subjects**

(i) When You provide Personal Data of another individual (including that of your relatives) for our Processing under this Policy, You possess, among other things, the following rights and obligations:

(ii) Be informed that We handle Personal Data in accordance with the law, regulations and statements outlined herein;

(iii) Respect and protect the Personal Data of others; ensure that the consent of the Data Subject is obtained, and/or the provision of Personal Data to Us is lawful;

(iv) Fully and accurately provide Personal Data upon consent to processing of Personal Data, ensure the accuracy of the provided Personal Data and promptly notify Us about any changes to the provided Personal Data;

(v) Comply with all requirements applicable to your provision of Personal Data under the law;

(vi) Ensure that We are free from any hindrance, risks, or legal consequences related to or arising from Personal Data Processing activities in accordance with your needs and requests; and

(vii) In case of any risks or legal consequences, You will take full responsibility and compensate Us in accordance with the law.

## **IX. CONTACT INFORMATION**

If You have any questions or concerns regarding this Policy, or how We handle Personal Data, We invite You to contact our Personal Data Protection Department at:

Department name: Personal Data Protection Department, Vision & Associates

Phone: +84-24-3934 0629

Email: [vision@vision-associates.com](mailto:vision@vision-associates.com)

Address: Room 308-310, 3rd Floor, Hanoi Towers, 49 Hai Ba Trung, Tran Hung Dao Ward, Hoan Kiem District, Hanoi, Vietnam

Head of department: Mrs. Nguyen Thanh Tram ([nt.tram@vision-associates.com](mailto:nt.tram@vision-associates.com))