

PERSONAL DATA PROTECTION AND PROCESSING POLICY

Preamble

We are FiinRatings Joint Stock Company (“**FiinRatings**”), is a local licensed Credit Rating Agency in Vietnam according to License No. 02/GCN-DVXHTN dated 20th March 2020 and other licenses on relevant amendments from time to time. FiinRatings provides credit ratings and related services to issuers, investors and creditors in Vietnam credit market. FiinRatings’s business model is required independency, transparency in every aspect in order to ensure FiinRatings’s integrity and neutrality in data, analyzed contents and expert opinions provided to the market.

FiinRatings’s particular businesses is heavily regulated under applicable laws on data, business/financial information, etc. Regarding information relating to enterprises, a required data is information on legal representatives, shareholders/partners, owners, managers of such enterprises and their affiliated people. Relating to these people’s information and other personal data in FiinRatings’s products/services, FiinRatings issues and implements this Personal Data Protection And Processing Policy (“**Policy**”) in order to ensure compliance with Decree No. 13/2023/ND-CP dated 17 April 2023 issued by the Government on Personal Data Protection (“**Decree 13**”) and other relevant regulations.

FiinRatings collects, processes personal data with the suitable purposes under related agreements in compliance with the laws or with other purposes stated in this Policy. In case the customers cannot provide required personal data, FiinRatings cannot provide our products/services to customers.

This Policy may be amended when necessary, and its applicable updated version shall be published on FiinRatings’s official website: <https://fiinratings.vn/>. Therefore, you are encouraged to regularly visit our official website to check out FiinRatings’s Data Protection and Processing Policy.

Main Terms

For the transparency in collecting, processing personal data, this Policy consists of the following terms:

1. Types of personal data collected, processed by FiinRatings;
2. Purposes of personal data processing;
3. Method of collecting, processing personal data;
4. Data subject’s consent;
5. Customer’s/Data subject’s rights and obligations;
6. Disclosure of personal data;
7. Consequences, damages which are unwanted but possible;
8. Period of personal data processing;
9. Monitoring the compliance with the Policy; and
10. Contact us.

Detailed Terms

1. Types of personal data collected, processed by FiinRatings

Respective to each of services provided by FiinRatings, we collect, process the following types of personal data:

No.	Type of service	Type of personal data
1	Credit rating services and services related to credit rating activities	Information regarding the representative (by law or by authorization) of the enterprise and other relevant individuals impacting credit rating results and the provision of services, including: <ul style="list-style-type: none"> - Full Name - Gender - Nationality - Date of Birth - Identification Document Details (ID Card/Citizen Identification/Passport) - Position within the Enterprise - Contact Information (Phone Number, Email Address) - Information on Shareholding/Capital Contribution in the Enterprise - Relevant Publicly Disclosed Information - Personal Relationships
2	Services for investors (including corporate credit assessment, industry credit research, and portfolio monitoring services)	Information regarding clients, representatives (by law or by authorization) of the enterprise, and other individuals related to the provision of services, including: <ul style="list-style-type: none"> - Full Name - Gender - Nationality - Date of Birth - Identification Document Details (ID Card/Citizen Identification/Passport) - Position within the Enterprise - Contact Information (Phone Number, Email Address) - Information on Shareholding/Capital Contribution in the Enterprise - Relevant Publicly Disclosed Information - Personal Relationships
3	Second Party's Opinion (SPO) on Green Bond Framework	Information regarding the representative (by law or by authorization) of the enterprise and other relevant individuals impacting the SPO report for green bond framework, including: <ul style="list-style-type: none"> - Full Name - Gender - Nationality - Date of Birth - Identification Document Details (ID Card/Citizen Identification/Passport) - Position within the Enterprise - Contact Information (Phone Number, Email Address) - Information on Shareholding/Capital Contribution in the Enterprise - Relevant Publicly Disclosed Information

2. Purposes of personal data processing

No.	Purposes	Basis for such purposes
1	Provisions of products/services to customers	For the executions of contracts and other related procedures such as extensions, conclusions, amendments of contracts
2	Communications during cooperations/ executions of contracts	For the exchanges of information during the cooperations/provisions of services
3	Provisions of services, customer services, responses of queries	For the executions of contracts (this is a benefit to the customer)
4	Provisions of information for the explanation to competent authorities such as Taxes, Insurance or Labour authorities	For the executions of contracts in compliance with the laws
5	Storages of personal data and other internal management tasks	For the executions of contracts or for the purpose of complying with the laws
6	Compliance with legal requirements relating to part/all of FiinRatings's business, e.g laws on Taxes, Anti-Money Laundering, Storage of Data, Dispute or Litigation.	For the compliance with the legal obligations with competent authorities and other related organizations/individuals
7	Updates/Amendments of products	Lawful benefits for the parties while providing/using services
8	Research and analysis of products (including the uses of new technologies)	For the executions of contracts
9	KYC procedures	For the executions of contracts

FiinRatings shall also use personal data (with other information) to provide customers promotions, suggestions of products, advertisements and discounts information by electronic means and other methods.

3. Method of collecting, processing personal data

FiinRatings may collect personal data from the following sources:

- a. Directly from individuals;
- b. Information of such individual is collected while the individual/organization in which such individual is a partner uses FiinRatings's services/products;
- c. From a broker or another intermediary, third party cooperating with FiinRatings to provide you with products/services/quotations;
- d. Subsidiary companies, affiliates, subsidiaries, dependant units of FiinRatings if such individual registered customers' information or purchased products/services from such units;
- e. Cookie, Navigation service, IP address when you access to websites, mobile applications or our systems or when you fill out our 'Contact us' form on our websites/applications;
- f. CCTV for recording at our business place(s);

- g. Third parties such as insurance companies, agencies, suppliers, financial organizations, medical staffs, courts, judgement enforcement agencies or reliable dossiers, sources which are publicized;
- h. Survey/Interview forms, questionnaires, etc. when such individual participates surveys, conferences, seminars; or
- i. Other sources such as: phone books, means of information communication, websites, articles, from other organizations, etc.

The processing of personal data means any or all of the activities that impact the personal data, such as the collection, recording, analysis, confirmation, storage, rectification, disclosure, combination, access, traceability, retrieval, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction or other relevant activities.

4. Data subject's consent

- a. FiinRatings maintains this Policy so that data subject and/or the upcoming personal data provider understand and agree voluntarily before FiinRatings collects, processes personal data. When an individual's personal data is provided to FiinRatings, FiinRatings uses such data with the basis and understanding that such provision of personal data was consented by the data subject and/or the customer was lawfully authorized by the data subject for the provision of personal data.
- b. In case the customer agrees to use the service or to the terms and conditions for the use of FiinRatings's service, or expresses one's consent by other proper methods with the reference to this Policy for the collection/process of personal data, it is understood that the customer confirms (i) to have been notified by FiinRatings about the collection, process of personal data in accordance with this Policy; (ii) to agree with the collection, process of personal data by FiinRatings or any other third party authorized by FiinRatings for the purposes stated in the above Section 2; and (iii) to have acquired the consent(s) from the data subject(s) and also to exempt FiinRatings from any responsibilities relating to the collection, process of personal data if the customer is not the data subject.
- c. The data subject's consent is not required in case FiinRatings needs to process the personal data in order to support the state authority in accordance with the relevant laws.
- d. The data subject' consent can be expressed in writing, by means of data message, other means which are equivalent to writing or other means which are not prohibited by the laws.
- e. Please note that, even though data subjects have the rights to consent with certain conditions, partly or fully or the rights to retrieve their consents under the laws, FiinRatings can only provide services and ensure the best provisions of products/services after acquiring the full consents from data subjects (unless the process of personal data does not require consent as stated above). It should be also noted that FiinRatings may/shall process personal data with other purposes which are not mentioned above (in such cases, we shall notify the data subject of such purposes when acquiring the consent from the data subject except in cases as stated in this Policy or the laws). After that, we may still continue processing your personal data within required scope or under the laws.
- f. The retrieve of consent does not affect the legality of the process of personal data occurring before the such retrieve.

5. Customer's/Data subject's rights and obligations

5.1. Customer's/Data subject's rights

a. Right to be informed:

Customer/Data subject has the right to be informed of his/her personal data processing, unless otherwise provided by the laws.

b. Right to give consent:

Customer/Data subject has the right to give consent to the processing of his/her personal data unless cases under Article 17 Decree 13.

c. Right to access personal data:

Customer/Data subject have/has the right to access his/her personal data in order to look at, rectify or request rectification of his/her personal data, unless otherwise provided by the laws.

d. Right to withdraw consent:

Customer/Data subject has the right to withdraw his/her consent unless otherwise provided by the laws.

e. Right to delete personal data:

Customer/Data subject has the right to delete or request deletion of his/her personal data, unless otherwise provided by the laws.

f. Right to obtain restriction on processing:

Customer/Data subject have/has the right to request for the restriction on the processing of your/his/her personal data, unless otherwise provided by the laws.

The restriction on the processing of personal data shall be implemented within 72 hours after receiving customer's/data subject's request, and on all personal data that customer/data subject request(s) for the restriction unless otherwise provided by the laws.

g. Right to obtain personal data:

Customer/Data subject has the right to request the Personal Data Controller, the Personal Data Controller-cum-Processor to provide himself/herself with his/her personal data, unless otherwise provided by the laws.

h. Right to object to processing:

Customer/Data subject has the right to object the Personal Data Controller, the Personal Data Controller-cum-Processor for the processing of his/her personal data in order to prevent or restrict the disclosure of personal data or the use of personal data for advertising and marketing purposes, unless otherwise provided by the laws.

The Personal Data Controller, the Personal Data Controller-cum-Processor shall comply with customer's/data subject's request within 72 hours of receiving the request unless otherwise provided by the laws.

i. Right to file complaints, denunciations, and lawsuits:

Customer/Data subject has the right to file complaints, denunciations, and lawsuits as prescribed by law.

j. Right to request for compensation of damage:

Customer/Data subject has the right to claim damage as prescribed by law when there are violations against regulations on the protection of his/her personal data, unless otherwise agreed by parties or unless otherwise prescribed by law.

k. Right to self-protect:

Customer/Data subject has the right to self-protect or request competent agencies and organizations to implement civil rights protection methods according to the applicable laws.

5.2. Customer's/Data subject's obligations

- a. To protect his/her personal data by himself/herself; to request other related organizations, or individuals to protect his/her personal data.
- b. To respect and protect other individuals' personal data.
- c. To provide personal data fully and accurately when providing consent for personal data processing.
- d. To participate in the popularization and dissemination of personal data protection measures.
- e. To comply with the laws of personal data protection and participate in the prevention of breaches of personal data protection regulations.

6. Disclosure of personal data

FiinRatings discloses personal data within FiinRatings and parents companies, subsidiary companies, affiliates, subsidiaries, dependant units of FiinRatings and to business partners who provide services to us (including but not limited to insurance companies, lawyers, banks, accountants, financial organizations, providers of management services, telecommunication services, computer services, payment services, printing services, etc.), partners who support executing the purposes stated in this Policy.

Additionally, we may disclose personal data to third parties without customer's/data subject's consents in certain circumstances under the laws, including but not limited to:

- a. The personal data shall be processed to protect the life and health of the data subject or others in an emergency situation.
- b. Disclosure of personal data in accordance with the law.
- c. Processing of personal data by competent regulatory authorities in the event of a state of emergency regarding national defense, security, social order and safety, major disasters, or dangerous epidemics; when there is a threat to security and national defense but not to the extent of declaring a state of emergency; to prevent and fight riots and terrorism, crimes and law violations according to the provisions of the applicable laws.
- d. The personal data shall be processed to fulfill obligations under contracts the data subjects with relevant agencies, organizations, and individuals as prescribed by law.
- e. The personal data shall be processed to serve operations by regulatory authorities as prescribed by relevant laws.

7. Consequences, damages which are unwanted but possible

We shall make reasonable efforts to ensure the collections/processes of personal data are precise and fully. However, it also means that customer/data subject must update FiinRatings on any changes in the provided personal data. We shall not take any responsibilities for the incorrectness or incompleteness of personal data arising from the fact that customer/data subject did not update FiinRatings on the relevant changes in the provided personal data.

We shall also take reasonable security measures to ensure that the personal data is protected safely and fully. The appropriate measures shall be executed to prevent any illegal access, collection, usage, disclosure, amendment, leak, loss, impairment and/or change of personal data. However, no data can be completely ensured of safety. Therefore, we cannot undertake that the personal data is completely protected in a few certain cases, including but not limited to:

- a. Defects in hardware, software during the process which lead to the loss of personal data; or
- b. Security vulnerabilities which are out of our control; the attack by hacker(s) which affects the personal data.

In such cases, FiinRatings is responsible for notifying the competent authority to investigate and resolve in a timely manner and notifying the customer/data subject in accordance with the laws.

8. Period of personal data processing

Personal data is processed from when we receive the personal data provided by customer/data subject and have the appropriate legal basis to process the personal data in accordance with the laws.

In accordance with the laws, the personal data shall be processed until the purposes of such process is completed, however, in all cases, no longer than 05 years from when FiinRatings receives the personal data. We may be required to store the personal data even after the termination of the contract between FiinRatings and customer for the purpose of complying with our legal obligations under the laws or with competent authority's request.

9. Monitoring the compliance with the Policy

With this Policy and FiinRatings's internal control system, FiinRatings monitors the protection of personal data and the compliance with Decree 13 in accordance with this Policy, and also ensures to supervise and remind the relevant employees, departments comply with this Policy.

FiinRatings shall apply reward policy for the compliance and also sanctions to reduce/eliminate defaults in the protection of personal data.

10. Contact us

If you, at any time, have any queries or requests relating to this Policy or to how we may manage, protect and/or process personal data, please do not hesitate to contact our Data Protection Officer at:

Address : **FiinRatings Joint Stock Company**

Floor 10th, Peakview Building

No. 36 Hoang Cau street, O Cho Dua ward, Dong Da district, Hanoi city, Vietnam

Email : legal.compliance@fiinratings.vn

This Policy and FiinRatings's statements in this Policy come into effect from 24/12/2024, are passed by General Director of FiinRatings and stored in FiinRatings's headquarter.