

## DATA PRIVACY POLICY

We, **Eastspring Investments Fund Management Limited Liability Company** (hereinafter referred to as “Eastspring Vietnam”, “we”, “us”, or “our”), take the privacy and protection of your personal data seriously.

We understand that you need to acknowledge transparently below information about how we process and protect your personal data within the framework of regulations as well as privacy standards at Eastspring Vietnam. We have also set out herein what rights you have, and how you can get in touch with us.

When we say “you”, “your” herein, we mean all potential and existing investors (including but not limited to individual investors, institutional investors, legal representatives, and owners of institutional investors), distributors (potential or existing), potential candidates, staffs, counterparties, contractors and service providers.

When mentioning “personal data”, we mean information about you, such as your name, date of birth and contact details, ... in the forms of symbols, letters, figures, images, sounds or similar forms in the electronic environment that is associated with you. We process personal data from you that is necessary for us to either provide you with the product or service you’ve requested or to comply with contractual or statutory requirements, or for other purposes mentioned in the privacy notice below. Unfortunately, if you’re unable to provide certain personal data which is necessary for us to provide our products and/or services to you, we will not be able to provide you with those products and/or services.

We may change this Data Privacy Policy from time to time by updating our Data Privacy Policy page on our website. We encourage you to check our Data Privacy Policy from time to time on our website, as the version of our Data Privacy Policy which is displayed on our website takes precedence over all previous versions of our Data Privacy Policy.

### **PERSONAL DATA PROTECTION AND PROCESSING NOTICE**

This Personal Data Protection and Processing Notice ("Privacy Notice") is part of Eastspring Investments Fund Management Limited Liability Company's commitment to protect and handle personal data.

Protecting and handling your personal data has always been of utmost importance to us. Therefore, through this Privacy Notice, we desire to be transparent about **the entire method we protect and process your personal data**, including but not limited to the purpose, type of data and how we process, collect, store, share and use your personal data to keep it private and secure.

We always make every effort to send this Privacy Notice to you so that you can read, understand, and know it well before performing any or all of the processing of your personal data. This Privacy Notice provides you, including but not limited to:

- Detailed information about the types of personal data we collect about you (described in full in Section A);
- The purposes for which we process your personal data, together with information about the organizations and individuals involved in the processing of the personal data, and the length of time for which your personal data is stored by us (please refer to Section C);
- The method we handle your data is reflected throughout in the Privacy Policy;
- What are your rights and obligations with respect to personal data (as set out in Section G);
- Unexpected consequences are likely to happen when processing personal data (mentioned in Section K); and
- How to contact us regarding your needs.

As necessary, we may amend, update or adjust the contents of this Privacy Notice at any time, and the most current version of the Privacy Notice will be posted on our official website. You are advised to regularly check the Data Privacy Policy as the version of the Data Privacy Policy displayed on our website is always the most recently updated version.

## **CONSENT IN THE PROCESSING OF PERSONAL DATA**

We make every effort to send this Data Privacy Policy to you for your reading, understanding and voluntary consent before we start all activities in the personal data processing process.

For example, for marketing, product recommendation, advertising and promotional purposes, we will need your consent before processing your personal data for this purpose (Please refer to Section I). Or, for the purpose of opening an account, subscribing or redeeming fund certificates, we may need your consent before processing, collecting, using and/or providing it to third parties (such as custodian banks, omnibus agents, etc.) when personal data (such as information, personal images, identification documents and other relevant data) is necessary for the purposes of appraisal and assessment of the status of distribution agents, potential candidates, partners, contractors and service providers; handle other related transactions

Your consent may be considered unnecessary where the law provides for the circumstances in which we may process personal data without your consent, such as (i) for the purposes of a governmental agency's activities regulated by specialized law and/or (ii) for the performance of a contractual obligation.

Before obtaining your voluntary consent, we would like you to know at least the following:

- What type of personal data are we processing about you and for what purposes (mentioned in Section A and Section C);
- Organizations and individuals that control or process your personal data (please refer to Section C); and
- What are your rights and obligations regarding personal data (as set out in Section G).

You may agree in part or with conditions attached. To the best of our ability, we can only start processing your data with your full consent, with no conditions attached. So, when we need your consent on contracts, documents, documents to start processing data, this means we need your full consent.

You may withdraw your consent in accordance with your rights under the law, except where we may process data without your consent. Your withdrawal of consent does not affect the legality of our data processing that was consented to by you prior to the withdrawal of consent. However, when you withdraw your consent to the processing of your personal data in accordance with this Data Privacy Policy, we may not be able to take the necessary actions to achieve the processing purposes described in Section C, or that you may not be able to continue using our products, services, or performing a contract with us. We may then continue to process your personal data to the extent required or under applicable law.

## **Section A – Personal data we process**

We collect, process (and may combine) the following types of personal data about you:

- Basic personal data including but not limited to full name, gender, date of birth, permanent residence, temporary residence, current residence, email address, phone number, nationality, identity card number, identification number, passport number, tax identification number;
- Sensitive personal data including but not limited to information about bank accounts, data on crimes, offenses collected, stored by law enforcement agencies, location;
- Copy of your identification;
- Detailed information on legal agreements including agreements established in writing between organizations and individuals on trust and authorization for the management and use of money and assets;
- Basic personal data of beneficial owners and associated persons of individuals and organizations according to current law;
- Basic personal data of family members (regarding recruitment and employee benefits);

- Records of your communication with us, such as the history of your calls to our customer care phone number and, if you contact us using our online services or through our smart app, details such as mobile phone location data, IP address and MAC address. In addition, we will record your information when you begin to fill out contact us forms on Eastspring Vietnam websites and send you progress or completion status as necessary;
- Transaction history, a list of products and services you are interested in and hold and related payment methods used by you;
- Information to request a refund when making a purchase of our products and services.
- Data analysis of marketing products or services made specifically for you, including communication history and information about whether you open these materials or click on affiliate links;
- Personal data that we obtain from competent authorities, including credit history, financial position and financial history made publicly available by these agencies or information shared with us;
- Information about your assets, such as property type, location and value; your financial situation and employment status including but not limited to: occupation, place of employment, average monthly income, source of income, salary and other income details, details of your savings, details of your expenditures and methods of payment;
- Details of your risk tolerance and personal data to determine this level of risk tolerance such as: education level, investment experience, investment products engaged in other than those at Eastspring Vietnam, investment purpose and expected time of investment, your behavior when investment portfolios gain/loss, ratio of investment money to personal income ratio, and
- Our understanding of you that we derive from analyzing or profiling our clients.

You can see more about how we handle your sensitive personal data in Section F.

## **Section B - Where we get your personal data**

We will collect personal data about you from the following general sources:

- Directly from you;
- Information about you is generated when you use our products and services;
- From a broker or other intermediary (e.g. distribution agent, Business Partner) with whom we work to provide products or services to you;
- Companies of the Prudential Group if you have subscribed to or purchased products from these companies;
- Cookies, location services, IP address when you visit our website or mobile application or when you fill out a contact us form in our website or application;
- Calls between you and us;

- Surveillance system (CCTV) to record audio and video at the office where we conduct business;
- Questionnaires, detailed contact information when you participate in surveys, investor conferences, seminars or when you update your contact information with us on our website, forms, including when you enter and exit our building, office, place of business; and
- From other sources such as authorities and, publicly available information (e.g., phone directories, social media, websites, news articles), other organizations to assist in crime prevention and detection, police and law enforcement agencies.

## **Section B.1 – Cookie Policy**

Our website uses cookies to distinguish you from other users. This helps us provide you with a good experience when you use the website and also allows us to improve our website. A cookie is a small file of letters and numbers that we store on your computer's browser or hard drive. Cookies contain information that is stored on your computer's hard drive. You can accept or decline cookies by modifying the settings in your browser. If you want to do this, please see the help in your browser.

We use the following types of cookies:

- Cookies required for the website. These are cookies that are required for the operation of our website. For example, cookies allow you to securely log in to our website;
- Activity analytics/management cookies. These cookies allow us to recognize and count the number of users who visit our website and to track how visitors move around our website while they are using it. This helps us improve the way the site works, for example, making it easier for users to find what they need; and
- Functional cookies. They are used to recognize you when you return to our website. This allows us to personalize our content for you, greeting you by name and remembering your preferences (for example, your choice of language or region).

By continuing to use our website, you accept our use of cookies as outlined above.

## **Section B.2 – Surveillance System (CCTV) Policy**

At the office where our business and work activities are conducted (hereinafter referred to as the “Place of Operations”), we may use a CCTV surveillance system (such as a video camera). Our CCTV cameras can be placed in some public locations of the Place of Operations to record audio and video in real time with the aim of contributing to the protection of social order and safety; protect the legitimate rights and interests of the Place of Operation, of our employees, ours and yours in accordance with the law; prevent, combat, identify and investigate violations at the Place of Operations.

By continuing to operate at our Place of Operations, you consent to our surveillance through CCTV system and data processing for the purposes mentioned above.

### Section C – The purposes for which we process your personal data

We, Eastspring Vietnam, Prudential Group and our Business Partners will process personal data along with other information we collect, including but not limited to the **following purposes**:

Purpose	Legal basis
Provide, perform, maintain, and administer our related contracts, products and services, including enabling us to perform our obligations to you and to provide any related services as agreed.	Necessary for the performance of our contract with you or for taking steps before entering into a contract with you.
Check by going through a search support company or publicly available information (see more details in Section D).	Necessary for the performance of our contract with you or for taking steps before entering into a contract with you.
Provide service, customer care – such as answering your queries or notifying you of reports or changes.	Necessary for the performance of our contract with you. Upon the completion of signing contract with you, it is in our legitimate interest to maintain and develop our relationship with you.
Automate decision making or create your own profile (see more details presented in Section E).	
Store your information and perform other internal management tasks.	Necessary for the performance of our contract with you or to satisfy legal requirements.
Comply with relevant legal requirements governing all or part of our operations, such as Taxation, Anti-Money Laundering, data storage regulations, or litigation.	Comply with our legal obligations to competent state agencies and other relevant organizations and individuals.
Design and provide you with related financial and fund management products and services.	Our legitimate interests are in designing and improving products, providing value-added services, growing our business, and better understanding how to use our products.
Conduct research and statistical analysis (including the use of new technologies).	Necessary for the performance of our contract with you.
Processing, collecting, verifying performance conditions, evaluating your records, documents and documents for the purpose of appraising and evaluating the status of	Your consent is required before processing personal data, unless your consent is not required by law.

distribution agents, partners, contractors and service providers; Register for distribution agent profile.	Necessary for the performance of our contract with you or for taking steps before entering into a contract with you.
Processing, collecting and verifying candidate conditions; evaluate your records, documents and vouchers for the purpose of appraising and evaluating candidate qualifications; register candidate profiles; serving the process of recruiting, managing, signing contracts and employment agreements with candidates.	Your consent is required before processing personal data, unless your consent is not required by law. Necessary for the performance of our contract with you or for taking steps before entering into a contract with you.

In addition, we will use the personal data you provide to us, along with other information, to send you marketing offers, product recommendations, advertisements and promotions by electronic and non-electronic means including by post, as well as to send you product and service recommendations from carefully selected third parties. Please see Section I for more details. The legal basis we present above is based on your consent and the requirements of the law.

### **With whom we share your personal data and why**

We will share your personal data internally with Eastspring Vietnam, the Prudential Group and third parties who provide services to us (including but not limited to parties such as transfer agents, custodian and custodian banks, escrow agents, attorneys and other third-party service providers who provide management, telecommunications, computing, or other business authorization services for us, printing). If required, we may also transfer your personal data to crime prevention agencies, any other legislative, judicial or executive bodies.

We may process your personal data in a country other than the country in which you reside. To the extent we transfer your personal data, we will use appropriate safeguards and comply with the laws of the country to which your personal data is transferred. Upon your request, we will provide you with details of the data protection measures we are using.

### **We store your personal data for a certain period of time**

Your personal data stored by us will be secured by taking reasonable measures. To the extent permitted by law, we may store your personal data for the period necessary to properly and adequately fulfill the personal data processing purposes specified in this Data Privacy Policy. We may be required to store your personal data longer based on the requirements of the law in force from time to time such as the law on Taxation, Anti-Money Laundering, or to resolve disputes, legal issues, if any.

### **Section D – Reference Check**

We may use search engines, crime prevention agencies or publicly available information in cyberspace to help us check your identity and to prevent fraud and money laundering; This may



include checking your current or previous addresses. These results can be recorded for future reference.

These test results may also be used by a related person, family member or person to whom you have consented to provide your personal data.

If we lose contact with you, we may use these organizations or individuals to verify your address to help us contact you.

Any transfers of your personal data will always be done securely.

## **Section E – We may use your personal data to make automated decisions or create your personal profile**

We, Eastspring Vietnam, Prudential Group, our Business Partners may use your personal data to make automated decisions affecting you or create other personal profiles for you.

## **Section F – Processing of your sensitive personal data**

In some cases, we may need to process your sensitive personal data. This is personal data associated with privacy that, when violated, will directly affect your legitimate rights and interests. Therefore, we only process this personal data on the basis of your consent and/or in strict compliance with applicable laws.

## **Section G – Your rights and obligations**

Personal data protection legislation entitles you to exercise certain rights, and corresponding obligations, to us when we process your personal data.

### **Your rights**

You have the following rights:

- Complaints, denunciations or lawsuits in accordance with the law;
- Protect your personal data yourself or ask a competent agency or organization to implement civil rights protection methods as prescribed by law; and
- Other rights in accordance with relevant laws.

Unless otherwise provided by law, you have the right to:

- Know about how we process your personal data;
- Agree or disagree to allow us to process your personal data;
- Access to view, correct or request that we correct your personal data;
- Withdraw your consent;
- Delete or ask us to delete your personal data;
- Ask us to restrict processing of your personal data;
- Request a free copy of your personal data (we may charge your request if there is no clear basis or excessive abuse);



- Object to our processing of your personal data to prevent or limit the disclosure of personal data or its use for marketing, product recommendation, advertising and promotional purposes;
- Claim damages in accordance with the law when there is a breach of regulations on the protection of your personal data, unless otherwise agreed by the parties;

In addition, if you currently reside in Europe, additional rights under the General Data Protection Regulation (GDPR) may apply. In certain cases, we will transfer your personal data to another organization at your request.

To exercise your rights on legal grounds or to have an explanation of these right(s), you may contact us in the Contact Us section. We reserve the right to request additional documents, appropriate documents to help us identify as well as screen, verify the legitimacy and validity of your claim to us. After verification, we will process your requests within the time limit specified by law.

## **Your Obligations**

You have statutory obligations as follows:

- Self-protect your personal data; ask us to protect your personal data;
- Respect and protect the personal data of others;
- Provide complete and accurate personal data when agreeing to allow us to process personal data; and
- Other obligations in accordance with relevant laws

## **Processing of personal data of children**

We understand very well the importance of protecting children's personal data. A child is a person under the age of 16 under applicable law in Vietnam, and the definition of this age may vary depending on the laws of the jurisdiction in which the child is being governed.

We have been and will always apply appropriate, additional safeguards and procedures to contribute to the safety of children's personal data on the principle of protecting the rights and in the best interests of children.

Before processing children's data, we need the consent of the children in the case of children from full 07 years of age (until under 16 years old), and the consent of their father, mother, or guardian as required by law, unless otherwise provided by law.

We will take the necessary measures, as required by law, to verify the age of the children before processing the children's personal data. You need to understand that, if you provide us with personal data about a child, you must, and can prove, be the child's parent or legal guardian or have the consent of the child's parent or legal guardian before doing so.

We will stop processing children's personal data, delete or destroy children's personal data in statutory cases, for example (i) when a child's parent or guardian withdraws his or her consent to the processing of a child's personal data or (ii) at the request of a competent authority.

### **Processing of personal data of persons who are declared missing or deceased**

Before processing personal data relating to the personal data of a person who has been declared missing or deceased, we will need the consent of that person's spouse, or adult child, unless otherwise provided by law, for example in cases where we are allowed to process personal data without the consent of the data subject.

### **Section H – Providing their personal data on behalf of others**

When you provide us with personal data about another person (or many others), we understand that you are a guardian or have been duly authorized by that person(s) to provide personal data on their behalf. This includes providing consent to:

- We process the personal data of that person(s) in accordance with the Privacy Policy that we have explained to you; and
- You may receive information protection notices on their behalf.

If for any reason you are interested in whether you are authorized to provide us with information about others, please contact us using the contact information below before sending us anything.

### **Section I – Consent for Marketing, Product Presentation, Advertising and Promotion**

As required by law, we will need your consent before processing personal data in order to send you marketing, referrals, advertising and promotional communications related to personalized products (which you may find interesting, or which are designed specifically to your interests) on the principle that you are well aware of the content, method, form, frequency of product introduction, relevant to each type of program, and relevant legislation.

We will use the types of data collected from you (as set out in Section A) for processing for marketing, product recommendation, advertising and promotional purposes (covered in Section C) in the form of posts about our products and services and carefully selected third parties (as mentioned in Section C).

From time to time, we may send more details about products, services and special offers to you by electronic and/or non-electronic means. We will only do this if you agree for us to contact you by the appropriate means.

You have full rights and obligations with respect to the personal data you have provided to us under this Data Privacy Policy. And, in the event that you change your mind and/or you would like to opt out of receiving marketing communications, product recommendations,

advertisements and promotions, you may let us know at any time by submitting a request using one of the options in the Contact Us section.

## **Section K – Possible consequences, unexpected damage**

### **When processing your request:**

As mentioned in Section G, you have statutory rights and are required to be exercised by us while processing your personal data. At this point, it may take us a reasonable time (depending on the complexity and impact of your request on the relationship between us and you) to process your request and/or to notify you of the possible consequences or damages if your request is executed.

### **We urge you to note that:**

- Depending on the nature and scope of your request, we may not be able to continue to provide the service to you, and as required by law on a case-by-case basis, we will also notify you prior to completing the processing of your request.
- In certain cases, we may not be able to accept your request. For example, if you ask us to delete personal data, transactions while legally, Eastspring Vietnam is obligated to maintain records of such individuals, contracts, transactions for compliance and provision in accordance with the law.
- Or as in the case, we are unable to process your request to withdraw your consent while Eastspring Vietnam is performing its contractual obligations between Eastspring Vietnam and you; or need immediate processing of relevant personal data to protect the life and health of the data subject or others as required by law.

### **When processing your data:**

We use measures to protect and process your personal data as required by law. In limited cases, violations when handling personal data (such as loss, destruction or damage due to incidents, using technical measures) may occur, and it is not at all what we want. Within the framework of the law, we will proceed to notify the violation to related parties within the statutory time limit.

Compensation for damages, if any, in the event of a breach of regulations on the protection of personal data will also be effected by agreement or by law.

## CONTACT US

If you wish to exercise your rights under Section G or if you require any information pursuant to this notice, you may contact us in a variety of ways.

- Call our hotline: (028) 3910 2848
- Email us at: [cs.vn@eastspring.com](mailto:cs.vn@eastspring.com)
- Or contact us directly at our office: 23rd Floor, Saigon Trade Center Building, 37 Ton Duc Thang, District 1, Ho Chi Minh City
- If you would like to stop receiving advertising from Eastspring Vietnam, please email: [cs.vn@eastspring.com](mailto:cs.vn@eastspring.com)

## NOTE:

- Prudential Group includes Prudential Plc, Prudential Holdings Limited and its subsidiaries, including Eastspring Vietnam. Prudential plc operates independently and is not affiliated with Prudential Financial, Inc., a company operating in the United States, or Prudential Assurance Company, a subsidiary of M&G Plc incorporated in the United Kingdom.
- Business Partners means our service providers, accountants, auditors, information technology platform service partners, intermediaries, other stakeholders, planning advisors, consultants, selected insurance and financial product providers, and legal advisors.



### Contact with us:

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