

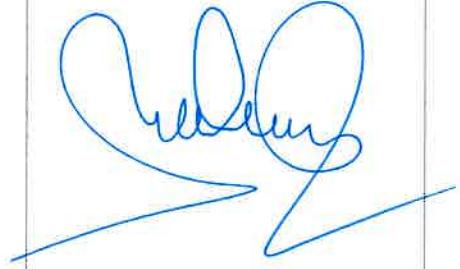
# VIETNAM FIINGROUP JOINT STOCK COMPANY

## PERSONAL DATA PROTECTION POLICY

### (1st Amendment)

(Issued in conjunction with the Personal Data Subject Request Processing Procedure and Decision No. 01-122025/QD-FG regarding the Promulgation of the Personal Data Protection Policy dated 31<sup>st</sup> December, 2026 by the Chief Executive Officer of Vietnam FiinGroup Joint Stock Company)

**Effective Date: 01/01/2026**

SUBMISSION, APPROVAL	FULLNAME	SIGNATURE
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Reviewed by	<b>Innovation Department</b> <b>Represented by:</b> Bui Thanh Trung <b>Title:</b> Deputy CTO	
Approved by	<b>Represented by:</b> Nguyen Huu Hieu <b>Title:</b> Chief Executive Officer	

## HISTORY OF DOCUMENT EDITING

Issue number	Effective date	Key Content/Edits
1	30/06/2023	First Issue
2	01/01/2026	Second Issue (First Amendment)

## POLICY PROVISIONS

**Vietnam FiinGroup Joint Stock Company ("FiinGroup", "the Company")** is a pioneer in the field of financial data and analytics in Vietnam. The Company provides financial and business data analytics platforms, along with in-depth market research services catering to domestic and international investors, financial institutions, and corporations. The Company's business model demands independence and transparency in all activities to ensure the integrity and objectivity of all data, analytical content, and professional opinions provided to the market.

The Company is pleased to announce this Personal Data Protection Policy (First Amendment) (the "Policy"), which sets out new terms and conditions regarding the protection of personal data in compliance with the Law on Personal Data Protection 2025, Decree No. 356/2025/ND-CP detailing a number of articles and measures for the implementation of the Law on Personal Data Protection guiding the implementation of the Law on Personal Data Protection, and other relevant prevailing laws and regulations. This Policy may be amended from time to time, and the latest updated version will be publicly posted on the Company's official website: <https://fiingroup.vn/>. This allows Personal Data Subjects, partners, customers, and organizations or individuals having a working, cooperative, or exchange relationship with the Company (collectively referred to as "**Customers**") to proactively review and comply with the Policy when providing information to the Company. Therefore, the Company recommends that Customers periodically check the Personal Data Protection Policy on the Company's official websites.

### ARTICLE 1. SCOPE AND SUBJECTS OF APPLICATION

#### 1.1. Subjects of Application

1.1.1. Applicable to all Customers of the Company.

Once the Personal Data Protection Policy is accepted by the Customer (in any form), it constitutes an agreement between the Customer and the Company regarding Personal Data throughout the process of establishing, maintaining, and developing relationships and transactions between the Customer and the Company.

1.1.2. Under this Policy, the Company acts as the Personal Data Controller/Processor.

#### 1.2. Scope of Application

1.2.1. All personal information of the subjects specified in Article 1.1 of this Policy that the Company collects, processes, and stores during the provision of services.

1.2.2. Personal data processing activities include: collection, analysis, synthesis; encryption, decryption; rectification; erasure, destruction; de-identification; provision, disclosure, transfer; and other activities affecting personal data.

### ARTICLE 2. DEFINITIONS

2.1. *Personal Data* refers to digital data or information in other forms that identifies or helps identify a specific individual, including: basic personal data and sensitive personal data. De-identified data is no longer considered personal data. (as specifically stipulated in

Article 3 of Decree No. 356/2025/NĐ-CP detailing a number of articles and measures for the implementation of the Law on Personal Data Protection)

- 2.2. *Basic Personal Data* refers to personal data that reflects an individual's identity and background commonly and frequently used in transactions and social relationships, belonging to the list promulgated by the Government. (as specifically stipulated in Article 4 of Decree No. 356/2025/NĐ-CP detailing a number of articles and measures for the implementation of the Law on Personal Data Protection)
- 2.3. *Sensitive Personal Data* refers to personal data associated with an individual's privacy which, if violated, will directly affect the legitimate rights and interests of agencies, organizations, or individuals, belonging to the list promulgated by the Government.
- 2.4. *Personal Data Protection* refers to the use of forces, means, and measures by agencies, organizations, or individuals to prevent and combat activities that infringe upon personal data.
- 2.5. *Personal Data De-identification* is the process of modifying or removing information to create new data that cannot identify or help identify a specific individual.
- 2.6. *Personal Data Processing* refers to any activity that affects personal data, including one or more of the following: collection, analysis, synthesis, encryption, decryption, rectification, erasure, destruction, de-identification, provision, disclosure, transfer of personal data, and other activities affecting personal data.
- 2.7. *Personal Data Recipient* refers to the Company and/or parties authorized by the Company for the purpose of performing personal data protection and processing activities in accordance with the law.
- 2.8. Personal Data Customer refers to an individual or organization that provides personal data to the Personal Data Recipient.
- 2.9. Personal Data Controller and Processor refers to the Company, which simultaneously decides the purposes and means of processing and directly processes the personal data.
- 2.10. Personal Data Subject refers to the individual to whom the personal data relates.
- 2.11. Consent of the Data Subject refers to the permission given by the data subject to process their personal data, unless otherwise provided by law.
- 2.12. Third Party refers to any organization or individual other than the data subject, the personal data controller, the personal data controller and processor, or the personal data processor, who is involved in the processing of personal data in accordance with the law.
- 2.13. Services refers to the services provided by the Company to Customers to support their operational organization and internal management through websites, applications, and other related services offered by the Company. Specifically, under this Policy, Services include:
  - (i) The Company's websites at: <https://fiingroup.vn/> and product websites belonging to the Company, including: <https://web.fiintrade.vn/>; <https://fiinresearch.vn/>; <https://fiingate.vn/>; <https://fiinpro.com/fiinpro-x/>; <https://fiinquant.vn/>;

<https://fiinratings.vn/ContactUs> ;  
<https://auth.fiingroup.vn/Account/SignUp?serviceType=FiinRating&returnUrl=https://fiinratings.vn/> .

(ii) Other services provided by the Company.

2.14. For the avoidance of doubt, within this Policy, any content stated as "*in accordance with the law*", "*under prevailing laws and regulations*", or "*as per the Company's regulations*" shall be understood to refer to the regulations in effect at any given time. Such regulations may be subject to change due to amendments in the law or at the Company's sole discretion.

## ARTICLE 3: COMMITMENTS TO PERSONAL DATA PROTECTION

3.1. This Policy explains the purposes and methods by which the Company controls and/or processes personal data provided by Customers during the preparation for transactions, throughout the performance of transactions with the Company, or during interactions with the Company.

3.2. This Policy also guides Customers on how to exercise their rights regarding their personal data, as specifically provided in the Company's Personal Data Subject Request Handling Procedure (attached).

3.3. The Company commits to complying with the following principles during the process of controlling and processing Customers' personal information:  
Customers' personal data shall be controlled and processed in a lawful, fair, and transparent manner, and in compliance with applicable laws and regulations;

3.3.1 Customer's personal data shall be controlled and processed lawfully, fairly, and transparently in accordance with applicable laws;

3.3.2 Customer's personal data shall be collected for specified, explicit, and legitimate purposes, with the data subject's independent consent for each distinct purpose. Such data shall not be processed beyond the scope of the consented purposes as set forth in this Policy and in compliance with applicable laws;

3.3.3 Customer's personal data shall be stored appropriately and within the scope necessary for processing purposes in accordance with applicable laws;

3.3.4 Customer's personal data shall be accurate and kept up to date; inaccurate data relative to the purposes for which they are processed shall be erased or rectified without delay in accordance with applicable laws;

3.3.5 The Company shall apply appropriate technical and organizational measures in accordance with applicable laws to ensure an adequate level of security for personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

3.4. The Company ensures and takes sole responsibility for ensuring that its partners (service providers, other vendors, customers, etc.) also comply with personal data protection requirements in accordance with applicable laws.

3.5. The Company commits to complying with other principles prescribed by law regarding personal data protection, particularly regulations concerning the rights of data subjects and obligations regarding cross-border data transfers

## **ARTICLE 4: TYPES OF PERSONAL DATA CONTROLLED AND PROCESSED**

Personal data that the Company may process includes, but is not limited to, the following:

**4.1. Basic Personal Data:**

- 4.1.1. Full name, middle name, and birth name; other names (if any);
- 4.1.2. Date of birth; date of death or date of being declared missing;
- 4.1.3. Name, Citizen Identity Card/Identity Card/Passport number, gender, date of birth, position/title; (iv) Place of birth, place of birth registration, permanent residence, temporary residence, current residence, native land, contact address;
- 4.1.4. Gender;
- 4.1.5. Nationality;
- 4.1.6. Personal images;
- 4.1.7. Phone number, personal identification number, passport number, driver's license number, license plate number;
- 4.1.8. Information on the individual's digital accounts;

**4.2. Data generated when you access and/or use the Company's Platforms, including but not limited to:**

- 4.2.1. Image, audio, and video data generated during the Provider's use of camera services with data storage features provided by the Data Controller and/or Processor;
- 4.2.2. Images of individuals, including images provided during service registration and images uploaded by the Provider to the Company's applications/websites during service usage;
- 4.2.3. Data uploaded, stored, or created by the Provider on systems or cloud computing platforms provided by the Data Controller and/or Processor;
- 4.2.4. Information regarding an individual's digital accounts; personal data reflecting activities and activity history on cyberspace;
- 4.2.5. Telecommunications consumption behavior data: calls, SMS, data, and VAS (Value-Added Services);
- 4.2.6. Data provided by the Provider to the Data Controller and/or Processor upon registration for service usage, as well as data generated during the Customer's use of the services of the Data Controller and/or Processor.

**4.3. Data regarding history and conversation content between the Customer and the Company, including but not limited to:**

- 4.3.1. Exchanges between the Data Controller and/or Processor and the Provider;
- 4.3.2. Call information, messages, and call recording data generated during the Provider's use of voice services, messaging, and hotline/call center services of the Data Controller and/or Processor;

## ARTICLE 5: PURPOSES OF PERSONAL DATA CONTROL AND PROCESSING

5.1. The Customer agrees to permit the Company to process their Personal Data and share the data processing results for one or more of the following purposes:

No.	Purposes
<b>I. Contract performance and service provision</b>	
01	Providing products/services to customers; Managing related contract documents.
02	Contact and exchange information during cooperation/contract performance;
03	Service provision, customer care, and inquiry handling;
04	Customer support, updating customer information upon purchase or use of products and services provided by the Company or its partners;
05	Investigating and resolving customer inquiries and complaints;
06	Other cases for the purpose of executing transactions, contracts, and agreements between the Company and Customers, and in compliance with legal regulations.
<b>II. Operations – Security – Anti-fraud</b>	
07	Perform KYC procedures
08	Adjusting, updating, securing, and enhancing products, services, and equipment provided by the Company;
09	Identity verification and ensuring customer information security;
10	Preventing and protecting against fraud, identity theft, and other illegal activities;
<b>III. Legal obligations</b>	
11	Providing information and explanations to competent state authorities, such as tax, insurance, and labor agencies;
12	Complying with relevant legal requirements governing part or all of the Company's activities, such as laws on taxation, anti-money laundering, data retention regulations, or disputes and litigation.
13	Collecting, storing, and using Customers' personal data for the purpose of service performance, such as record-keeping and compliance with legal and tax obligations; retaining such data for a specific period of time or as required by law;
<b>IV. Marketing</b>	

14	Serving the Company's business activities, such as conducting research and statistical analysis, and product research (including the use of new technologies).
15	Notifying Customers of changes to policies and promotions of products and services provided by the Company;
5.2.	In the event that the Customer's Personal Data needs to be processed for other purposes or at the Customer's request, the Company shall notify the Customer to obtain their consent prior to implementation.

## ARTICLE 6: METHODS OF CONTROLLING AND PROCESSING PERSONAL DATA

### 6.1. Methods of Collection

The Company may collect personal data of individuals from the following sources:

- 6.1.1. Directly from individuals;
- 6.1.2. Information about the individual provided when the individual or the organization of which that individual is a member uses the Company's products and services;
- 6.1.3. From a broker or an intermediary, or other third parties collaborating with the Company to provide products or services, or to provide quotations to Customers.
- 6.1.4. The Company's subsidiaries, affiliates, branches, and dependent units, provided that the individual has previously registered customer information or purchased products/services from these entities;
- 6.1.5. Cookies, location services, and IP addresses when the Customer accesses the Company's websites, mobile applications, or systems, or when the Customer fills out the "Contact Us" form on the Company's websites or applications;
- 6.1.6. Third parties such as insurance companies, agents, suppliers, financial institutions, medical professionals, courts, enforcement agencies, or public records and official information sources that have been publicly disclosed;
- 6.1.7. Surveys, interviews, questionnaires, etc., when the individual participates in surveys, conferences, or seminars;
- 6.1.8. From other sources such as: telephone directories, mass media, websites, news articles, or other organizations;

### 6.2. Methods of Storage

- 6.2.1. Personal Data shall be stored in Vietnam within the Company's database systems or at any location where the Company or its branches, representative offices, subsidiaries, affiliates, partners, or service providers maintain facilities.
- 6.2.2. The retention period for personal data is determined based on the purposes of use as stated in this Policy and in accordance with the provisions of law.

### 6.3. Methods of Transferring/Sharing Data

- 6.3.1. The Company shall not sell Personal Data to any party. The Company will employ necessary security measures to ensure that the transfer/sharing of Personal Data is conducted securely.
- 6.3.2. If the recipient of Personal Data is based outside the territory of Vietnam, when providing/transferring Personal Data abroad (including but not limited to using cyberspace, equipment, electronic means, or other forms to transfer Personal Data outside the territory of Vietnam), the Company will require the recipient to ensure the safety and confidentiality of the provided/transferred Personal Data. The Company commits to fully complying with the regulations and compliance requirements of Vietnamese law to ensure the security of Personal Data.

#### **6.4. Methods of Analysis.**

Personal Data is analyzed based on the Company's internal processes, data privacy principles, and information security standards for its information technology systems.

#### **6.5. Methods of Encryption/De-identification.**

Collected Personal Data is encrypted/de-identified in accordance with appropriate encryption/de-identification standards during storage, transfer, and processing to ensure that the data is always protected.

#### **6.6. Methods of Data Erasure**

In accordance with the provisions of law or upon a valid request from the Data Subject, the Company shall erase the stored Personal Data, except in the following cases:

- 6.6.1. The law does not permit the erasure of data or requires mandatory data retention;
- 6.6.2. The Personal Data is processed by competent state authorities for the purpose of serving the activities of state agencies as prescribed by law;
- 6.6.3. The Personal Data has been made public in accordance with the provisions of law;
- 6.6.4. The Personal Data is processed for legal requirements, scientific research, or statistical purposes in accordance with the provisions of law;
- 6.6.5. In cases of emergency regarding national defense, national security, social order and safety, major disasters, or dangerous epidemics; when there is a threat to security or national defense that has not yet reached the level of declaring a state of emergency; or for the prevention and combat of riots, terrorism, crimes, and violations of the law.
- 6.6.6. Responding to emergency situations that threaten the life, health, or safety of the Data Subject or other individuals.
- 6.6.7. Your payment card data issued by financial institutions is protected by the Company under the principle of not recording sensitive payment card details (card number, cardholder name, CVV number) on the Company's systems. Your payment transactions are processed on the systems of the relevant banks.

## **ARTICLE 7: RETENTION PERIOD OF PERSONAL DATA**

- 7.1. Personal Data shall be processed from the moment the Company lawfully receives the Personal Data and has established an appropriate legal basis for processing in accordance with the provisions of law.
- 7.2. The processing of personal data shall terminate when the Customer requests the Company to cease such processing, or when the Company no longer has any obligation to provide products or services to the Customer, or at such other times as prescribed by law.
- 7.3. The Company will store the personal data provided by the Customer on its internal systems during the course of service provision or contract performance, or until the purposes of control and processing are fulfilled, or until statutory compliance obligations are satisfied and any disputes are resolved; unless a longer retention period is required or permitted by the Customer and applicable laws.
- 7.4. Customer personal data shall be stored, managed, and kept confidential by the Company in accordance with the Company's regulations. The Company will implement reasonable measures to protect the Customer's Personal Data in alignment with this Personal Data Protection Policy and legal regulations during the storage process.

## ARTICLE 8: ORGANIZATIONS RELATED TO PERSONAL DATA PROCESSING

### 8.1. Organizations Receiving Personal Data

The Company shares personal data within itself and its subsidiaries, affiliates, branches, representative offices, dependent units, and with business partners providing services to the Company (including but not limited to insurance companies, lawyers, banks, accountants, financial institutions, other third parties providing management services, telecommunications, computing, payment, printing services for business purposes, etc.), and other partners for the purposes stated in Article 5 of this Policy. If requested, the Company may also transfer the Customer's personal data to competent government agencies.

### 8.2. Cross-border Transfer of Personal Data

The Company may transfer the Customer's personal data abroad for processing and storage to serve the purposes stated in Article 5 of this Policy. The Company's cross-border data transfer must comply with the provisions of Vietnamese law.

## ARTICLE 9: PROCESSING PERSONAL DATA IN SPECIAL CASES

The Company ensures that the processing of the Customer's personal data fully complies with legal requirements in the following special cases:

- 9.1. Closed-Circuit Television (CCTV) footage, in specific instances, may also be used for the following purposes:
  - 9.1.1. Quality assurance purposes;
  - 9.1.2. Public security and occupational safety purposes;

- 9.1.3. Detecting and preventing suspicious, inappropriate, or unauthorized use of P.A Viet Nam's facilities, products, services, and/or premises;
- 9.1.4. Detecting and preventing criminal activities; and/or
- 9.1.5. Conducting investigations and verifying incidents.
- 9.2. The Company always respects and protects the personal data of children. In addition to the personal data protection measures prescribed by law, before processing children's personal data, the Company shall verify the age of the child and obtain the consent of:
  - 9.2.1. The child and/or;
  - 9.2.2. The child's parents or guardian as prescribed by law.
- 9.3. In addition to complying with other relevant legal regulations, regarding the processing of personal data related to individuals declared missing or deceased, the Company must obtain the consent of one of the relevant persons as prescribed by applicable laws.

## ARTICLE 10: RIGHTS AND OBLIGATIONS OF DATA SUBJECTS REGARDING PERSONAL DATA

### 10.1. Rights of Data Subjects and Their Personal Data:

#### 10.1.1. *Right to be Informed and Right to Consent:*

- (i) Through this Policy, Customers are informed of and provide their consent to the Company's personal data processing activities.
- (ii) The Company maintains this Policy to ensure that personal data owners clearly understand and provide voluntary consent before the Company proceeds with the collection and processing of personal data.
- (iii) Accepting the use of services and agreeing to the terms and conditions when using the Company's services constitutes the personal data owners' consent and authorization for the Company to collect and process their personal data.
- (iv) In the event that organizations, enterprises, or customers acting as legal entities agree to use the services and accept the Company's terms and conditions, the Company understands that such organizations provide their consent for the use of relevant personal data. These organizations shall ensure that they have obtained the consent of the personal data owners and shall indemnify the Company against all responsibilities related to obtaining such consent from the personal data owners.
- (v) The consent of the personal data owner shall not be considered a mandatory condition in cases where the Company needs to process personal data to serve the activities of state authorities, as prescribed by law, or as stipulated in contracts with the individual or the personal data controller/processor.
- (vi) The consent of the Data Subject shall be expressed in a clear and specific manner that can be printed or reproduced in writing, including in electronic form or verifiable formats.
- (vii) Customers should note that, although by law, data subjects have the right to provide conditional consent, partial or full consent, or to withdraw their consent, the Company

can only provide and ensure the best products/services upon receiving full consent (except in cases where data processing does not require consent as mentioned above). In such instances, the Company also cannot guarantee the fulfillment of the purposes set forth in Article 5 of this Policy. Nevertheless, the Company may continue to process the Customer's personal data within the scope required or permitted by applicable laws.

#### *10.1.2. Right to Access, Rectify, or Request Rectification of Personal Data.*

Customers have the right to access, rectify, or request the rectification of their personal data at any time whenever they find the information related to them to be inaccurate or incomplete.

#### *10.1.3. Right to Request Provision, Erasure, and Restriction of Processing; Right to Object to Personal Data Processing.*

- (i) Customers have the right to request the erasure of their personal data stored by the Company in cases prescribed by applicable laws—for example, when the Customer's personal data is no longer necessary for the original purposes of collection and processing, or when the Customer's personal data is processed unlawfully.
- (ii) Customers have the right to request the Company to restrict the processing of their personal data without deleting the relevant data, subject to the conditions set forth by applicable laws.
- (iii) Customers have the right to object at any time to the Company's processing of their personal data for direct marketing purposes.

#### *10.1.4. Right to Withdraw Consent*

- (i) Where the processing of the Customer's personal data is based on the Customer's prior consent, the Customer has the right to withdraw such consent at any time by sending a written notice to the Company, unless otherwise prescribed by law. However, the withdrawal of consent shall not affect the lawfulness of any data processing previously carried out based on the Customer's consent.
- (ii) In the event that the Customer withdraws their consent, the Company may be unable to provide the Customer with full and quality services as requested if the information for which consent is withdrawn directly affects the service provision or service quality.

#### *10.1.5. Right to Complain, Denounce, File a Lawsuit, and Claim Damages in accordance with the provisions of law*

The Customer has the right to lodge a complaint if the Company commits a violation of personal data protection regulations, unless otherwise agreed by the parties or prescribed by law.

Customers may exercise their rights through the Personal Data Subject Request Processing Procedure (attached to this Policy). The Customer understands and agrees that they shall not exercise any of the aforementioned rights if the exercise of such rights causes damage or affects, or may potentially cause damage or affect, the operations and/or interests of the Company. In the event that the Customer withdraws their consent

for personal data processing, requests data erasure, or exercises other related rights regarding any or all of their personal data, such actions may:

- (i) Affect the legal validity of the contract and the legal relationship between the Company and the Customer;
- (ii) Result in the Company's products and services provided to the Customer being limited, restricted, suspended, or canceled, depending on the specific case. Such changes may lead to costs, expenses, or damages that the Customer and/or third parties will have to bear.

The Company will continue to use the Customer's personal data to the extent required (if any) or as prescribed by law.

## 10.2. Obligations of Customers regarding their Personal Data:

- 10.2.1. Self-protect their own personal data; request other relevant organizations and individuals to protect their Personal Data.
- 10.2.2. Respect and protect the personal data of others;
- 10.2.3. Implement and comply with legal regulations on personal data protection, this Personal Data Protection Policy, and participate in preventing and combating violations of personal data protection regulations.
- 10.2.4. Provide full, honest, and accurate personal data and other information as requested by the Company when registering for and using the Company's products and services, and upon any changes to such information. The Company shall protect the Customer's personal data based on the information registered by the Customer; therefore, the Company shall not be held liable for any inaccurate information that affects or limits the Customer's rights and interests.
- 10.2.5. Take personal responsibility for information, data, and consents created or provided in the network environment; take full responsibility in the event that personal data is leaked or compromised due to one's own fault.
- 10.2.6. In cases where the Customer is an organization providing personal data of related individuals or individuals under its management to the Company, the Customer must ensure that it has obtained the consent of such individuals for the provision of their data.
- 10.2.7. Regularly check the Company's official websites to update and comply with any changes (if any) related to the Personal Data Protection Policy. Take actions as instructed by the Company to clearly express consent or non-consent for the purposes of personal data processing as notified by the Company from time to time.
- 10.2.8. In the event of changes or adjustments to Personal Data, or upon discovering or suspecting that one's personal data has been exposed which may lead to risks during the use of services the Customer is responsible for contacting and notifying the Company immediately for timely updates, adjustments, or findings. The Customer shall be fully responsible for any delay in such notification; furthermore, such delay by the Customer shall indemnify and release the Company from all liability for damages and risks arising for the Customer and related parties (if any).

10.2.9. Cooperate with the Company, competent state authorities, or third parties in the event of issues affecting the Customer's personal data.

10.2.10. Other obligations as prescribed by law.

## **ARTICLE 11: POTENTIAL UNINTENDED CONSEQUENCES AND DAMAGES**

- 11.1. The Company always respects privacy and strives to secure and ensure the safety of the Data Subject's personal data, strictly complying with the legal regulations on personal data protection to minimize or eliminate unintended consequences and damages that may occur if personal data is leaked. However, beyond the Company's best efforts, absolute security cannot be guaranteed against all threats. Therefore, the Company commits to providing the maximum level of security for Personal Data.
- 11.2. The Customer understands that providing and authorizing the Company to use and process personal data involves inherent risks of leakage or inappropriate/untimely processing, which may arise from causes including but not limited to:
  - (i) Hardware or software failures during the data processing stage resulting in the loss of Customer data;
  - (ii) Security vulnerabilities beyond the Company's control, or system attacks by third parties leading to data breaches;
  - (iii) Data leaks caused by the Customer due to: negligence or falling victim to fraud; accessing websites or downloading applications containing malware, etc.
- 11.3. The Company recommends that Customers keep all information related to their account login passwords and OTP codes confidential and refrain from sharing such passwords or OTP codes with any other person.
- 11.4. Customers should secure their electronic devices during use. Customers are advised to lock, log out, or exit their accounts on the Company's website or Applications when they are no longer in use.
- 11.5. In the event the Company becomes aware that a data storage server has been attacked by a third party resulting in the loss of Customer Personal Data, the Company shall be responsible for reporting the incident to the competent authorities for timely investigation and processing, as well as notifying the Customers.
- 11.6. To the best of the Company's ability, access to the Data Subject's Personal Data is restricted to those with a "need-to-know" basis. Individuals with access to the data are required to maintain the confidentiality of such information.

## **ARTICLE 12: USE OF COOKIES**

- 12.1. The Company may use "Cookies" or other similar technologies to collect or share information for the purpose of improving its website and existing products and/or developing new services and features. "Cookies" are small data files that we send to the Data Subject/Customer's computer or mobile device. These files allow the Company to recognize the device, record information about when and how products or the website are

used, the number of visitors, and track the Customer's activities on the Company's platforms.

- 12.2. The Company may link the information collected from cookies to the Data Subject/Customer's personal data. Cookies are also used to link to information about products and services that the Customer has selected or expressed interest in. This serves purposes such as maintaining shopping carts, providing personalized content based on the Customer's preferences, and monitoring product usage.
- 12.3. Customers have the right to refuse or disable the use of cookies by adjusting the appropriate settings on their browser. However, the Company notes that this action may prevent the Customer from taking full advantage of the functions on our website or products.

## **ARTICLE 13: PROCESSING PERSONAL DATA WITHOUT THE DATA SUBJECT'S CONSENT.**

*Clause 1 Article 19 of the Personal Data Protection Law 2025 stipulates the cases of processing personal data without the consent of the Data Subject including:*

- 13.1. To protect the life, health, honor, dignity, rights, and legal interests of the Data Subject or others in urgent cases; protect the legitimate rights or interests of oneself, of others, or the interests of the State, of agencies and organizations in a necessary manner against acts of infringement upon the aforementioned interests. Personal data controllers, personal data processors, personal data controllers and processors, third parties are responsible for proving this case;
- 13.2. To resolve emergency situations; risks of threatening national security but not yet to the level of declaring a state of emergency; prevention and control of riots, terrorism, prevention and control of crimes and violations of the law;
- 13.3. Serving the activities of state agencies, state management activities as prescribed by law;
- 13.4. Implementing agreements of the Data Subject with relevant agencies, organizations, and individuals as prescribed by law;
- 13.5. Other cases as prescribed by law.

## **ARTICLE 14. MONITORING COMPLIANCE WITH THE POLICY**

- 14.1. Through this Policy as well as the Company's internal control system, the Company monitors the protection of personal data and compliance with the Personal Data Protection Law in accordance with the contents of the Policy mentioned above, while simultaneously ensuring the urging and reminding of employees, related departments in the correct implementation of the Policy's regulations.
- 14.2. The Company will apply reward policies for compliance as well as specific sanctions in limiting/eliminating violations in the field of personal data protection.

## **ARTICLE 15. GENERAL PROVISIONS**

- 15.1. This Policy and the Company's statements take effect from **01st January, 2026** having been approved by the Company's Board of Management and kept at the Company's headquarters. Customers understand and agree that this Policy may be amended from time to time and notified to Customers through the Company's electronic pages. The changes and the effective timing will be updated and announced at the Company's Transaction Channels and other channels. The Customer's continued use of the service after the notification period regarding the amended and supplemented contents from time to time means that the Customer has accepted those amended and supplemented contents.
- 15.2. This Policy is interpreted and governed in accordance with the laws of Vietnam.
- 15.3. This Policy is entered into on the basis of goodwill between the Parties. This Policy represents the entire Policy between the Parties and supersedes all prior understandings or Policies, whether in writing, oral, or in other forms relating to the matters mentioned above.
- 15.4. For the purpose of protecting personal data in accordance with legal regulations, this Policy shall also apply to contracts, agreements, documents, etc., between the Parties signed before, during, and after the time this Policy takes effect. This Policy is an attached, inseparable part of the commitments and agreements of the Customer with the Company and applies to all Personal Data and all transactions of the Customer with FiinGroup, representing the entire consent of the Customer towards FiinGroup in the Processing of Personal Data of the Data Subject/Customer.
- 15.5. In the event that any provision of this Policy is ruled invalid by a court of competent jurisdiction, that provision shall automatically be void and no longer bind the responsibilities of the Parties; however, such ruling shall not invalidate the remaining provisions of this Policy, and the effectiveness of those provisions shall remain fully maintained.
- 15.6. This Policy is publicly posted by the Company on the website so that the Parties are clearly informed. The Parties agree that they have read carefully, clearly understood the rights and obligations, and agree to the entire content of the Policy.
- 15.7. If any dispute arises out of or relates to the Processing of Personal Data, the Customer and the Company shall first resolve it together through negotiation in the spirit of the Customer's best interests. In the event that negotiation is unsuccessful, the parties have the right to bring that dispute to a Court of competent jurisdiction in Vietnam for resolution.

## ARTICLE 16. CONTACT INFORMATION FOR PERSONAL DATA PROCESSING

- 16.1. In case the Customer has any inquiries or questions related to the Personal Data Protection Policy or matters related to the rights of the Personal Data Subject or the processing of the Customer's Personal Data, the Customer please perform one of the following methods:
  - ✓ **Online via Email:** [info@fiingroup.vn](mailto:info@fiingroup.vn), Hotline: (84) 24 3562 6962

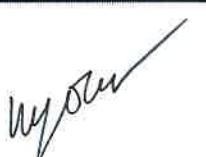
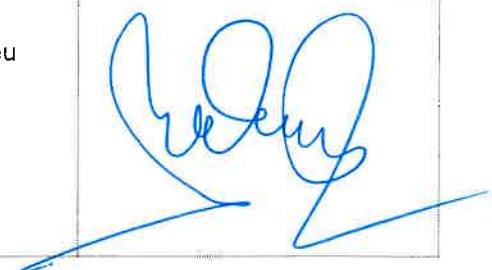
- ✓ **Directly at the Company's Headquarters:** Level 10, Peakview Tower, 36 Hoang Cau St., O Cho Dua Ward, Hanoi City.
- 16.2. Specifically, the method of implementation is clearly stated in **the Personal Data Subject Request Processing Procedure of FiinGroup** attached to this Policy.

## VIETNAM FIINGROUP JOINT STOCK COMPANY

### PERSONAL DATA SUBJECT REQUEST PROCESSING PROCEDURE (1st Amendment)

*(Issued in conjunction with the Personal Data Protection Policy of Vietnam FiinGroup Joint Stock Company dated 31<sup>st</sup> December, 2025 by the Chief Executive Officer of Vietnam FiinGroup Joint Stock Company)*

**Effective Date: 01/01/2026**

SUBMISSION, APPROVAL	FULLNAME	SIGNATURE
Submitted by	<b>Legal and Compliance Department</b>  <b>Represented by:</b> Tran Ngoc Anh <b>Title:</b> Deputy Head of Legal	
Reviewed by	<b>Innovation Department</b>  <b>Represented by:</b> Bui Thanh Trung <b>Title:</b> Deputy CTO	
Approved by	 <b>Represented by:</b> Nguyen Huu Hieu <b>Title:</b> Chief Executive Officer	

## HISTORY OF DOCUMENT EDITING

Issue number	Effective date	Key Content/Edits
1	30/06/2023	First Issue
2	01/01/2026	Second Issue (First Amendment)

## PERSONAL DATA SUBJECT REQUEST PROCESSING PROCEDURE

(Issued in conjunction with the Personal Data Protection Policy of Vietnam FiinGroup Joint Stock Company)

### 1. Purpose

This procedure stipulates the sequence, responsibilities, and time limit for handling requests from Personal Data Subjects ("Data Subjects") to ensure that FiinGroup Vietnam Joint Stock Company ("FiinGroup" or "the Company") fully complies with the Law on Personal Data Protection 2025 and relevant legal regulations.

This procedure is an inseparable part of the Personal Data Protection Policy, Contract terms, and Service Use Agreements binding the relationship between FiinGroup and Customers.

### 2. Scope of Application

Data Subjects have the right to request the Company to exercise the following rights regarding their Personal Data ("PD") in accordance with current legal regulations, including:

#### 2.1. *Right to request withdrawal of consent for processing PD:*

At any time, Data Subjects have the right to withdraw their consent, except in cases where PD is processed without the need for Data Subject's consent or as otherwise provided by law. However, the withdrawal of consent by the Data Subject for FiinGroup to process PD may limit or hinder the Company from performing its obligations or disrupt certain activities and interactions of FiinGroup with the Data Subject. Therefore, Data Subjects should carefully consider the possible consequences before exercising the right to withdraw consent.

#### 2.2. *Right to view, edit, or request correction of PD:*

Data Subjects have the right to access to view, edit, or request FiinGroup to correct the PD that FiinGroup is processing, unless otherwise provided by law.

#### 2.3. *Right to request provision of data:*

Data Subjects have the right to request FiinGroup to provide the Data Subject's PD that FiinGroup is processing, unless otherwise provided by law.

#### 2.4. *Right to request deletion, restriction of PD processing; and to submit an objection to PD processing:*

Data Subjects have the right to request FiinGroup to restrict the processing of certain PD, or to only carry out certain PD processing activities of the Data Subject, or to limit the time for processing the Data Subject's PD in accordance with the previously agreed purposes, unless otherwise provided by law.

Data Subjects have the right to delete or request FiinGroup to delete the Data Subject's PD that FiinGroup is processing, unless otherwise provided by law.

Data Subjects have the right to object to FiinGroup's processing of the Data Subject's PD for the purpose of preventing or restricting the disclosure of PD or the use of the Data Subject's PD for advertising or marketing purposes, unless otherwise provided by law.

### 3. Procedure for Handling Data Subject Requests

#### 3.1. Receiving Data Subject Requests

##### 3.1.1. Reception Channels

The Company receives Data Subject requests through the following channels:

- ✓ **Online via email:** info@fiingroup.vn, Hotline: (84) 24 3562 6962
- ✓ **Directly at the Company Headquarters:** 10th Floor, Peakview Tower, 36 Hoang Cau St., O Cho Dua Ward, Hanoi City.
- ✓ **Request Form:** Specifically stipulated in the **APPENDIX** of this Procedure.

### 3.1.2. Request Confirmation

From the time the request is received, FiinGroup's Human Resources Administration department ("HRA") shall prepare a Data Subject Request Reception Form and send it to FiinGroup's Personal Data Protection Officer ("DPO") within 24 hours of receiving the request.

The DPO Department will confirm the request and respond to verify necessary information with the Data Subject according to the time regulated in Section 3.1.3 of this Policy.

### 3.1.3. Request Response

Type of request	Response deadline	Processing time
Ceasing processing, withdrawing consent, restricting, and objecting to the processing of personal data of the data subject.	02 working days	15 days (or 20 days in cases involving a data processor/third party). Subject to a maximum of one (01) extension for a period not exceeding 15 days.
View, edit, or correct PD	02 working days	10 days (or 15 days in cases involving a data processor/third party). Subject to a maximum of one (01) extension for a period not exceeding 10 days.
Provide or delete PD	02 working days	20 days (or 30 days in cases involving a data processor/third party). Subject to a maximum of one (01) extension for a period not exceeding 20 days.
Implementing PD protection measures and solutions.	02 working days	15 days Subject to a maximum of one (01) extension for a period not exceeding 15 days.

In cases where an extension of the processing time is required, depending on the nature and complexity of the request, FiinGroup will notify the data subject via email regarding a suitable

processing extension. However, the data subject must clearly state the reason for the extension and shall be responsible for proving that such extension is necessary and reasonable.

Customers understand and agree that: (i) The Company will only fulfill the Customer's request within a period of time consistent with legal regulations when such request of the Customer is lawful, complete, and valid, and the Customer pays the incurred processing costs (if any); and (ii) subject to the Company's rights when invoking any exemptions and/or exceptions as provided by law.

#### 3.1.4. *Notification and Completion*

The Company will send a written notification via email or postal mail to the Data Subject's address (if specifically requested), including:

- (i) Processing result (success/failure).
- (ii) Reason (if the request is partially or fully denied, accompanied by complaint instructions).
- (iii) Data provision (if it is an access request).

### 4. Some notes on exercising the Rights of Personal Data Subjects

#### 4.1. General Notes:

- 4.1.1. The Company reserves the right to refuse to fulfill Data Subject requests in certain cases, including but not limited to: (i) The Data Subject does not follow the sequence and procedures guided by the Company, in which the request content is missing information or is invalid; (ii) The Data Subject fails to provide or provides insufficient papers and documents to verify identity; or (iii) in cases where the Company assesses signs of fraud or violations of Personal Data protection; or (iv) Legal regulations do not permit the fulfillment of the Data Subject's request.
- 4.1.2. Upon receiving a request from a Data Subject to exercise rights related to PD, the Company will notify the Data Subject of the possible consequences when the request is fulfilled. For security purposes, the Data Subject may need to submit their request in writing or use another method to prove and authenticate the Data Subject's identity. VietinBank [FiinGroup] may require the Data Subject to verify their identity before processing the request.
- 4.1.3. The Company will respond to the Data Subject's request within the time limit prescribed by law after receiving full request information. In the event that it cannot be performed within the aforementioned period, the Company will promptly notify the Data Subject.
- 4.1.4. If the Data Subject has grounds to believe that the processing of their PD violates legal regulations on PD protection, the Data Subject has the right to complain, denounce, file a lawsuit with competent state authorities, or claim damages in accordance with the law.

#### 4.2. Specific Notes:

- 4.2.1. Unless otherwise provided by law, Data Subjects only have the right to delete or request the deletion of their PD that we are processing in the following cases:
  - (i) The processing of the Data Subject's PD is no longer necessary for the collection purposes to which the Data Subject consented;
  - (ii) The Data Subject wishes to withdraw their consent for FiinGroup to process the Data Subject's PD;
  - (iii) The Data Subject objects to the processing of their data because there are no longer legitimate grounds to continue processing such PD;

- (iv) The PD is processed inconsistently with the previously agreed purposes, or the processing of PD violates legal regulations;
- (v) The PD must be deleted in accordance with legal regulations.

4.2.2. The Company reserves the right to refuse the request to delete PD if the Data Subject fails to provide sufficient information and documents to verify their identity, or if the Data Subject's reason for requesting deletion does not fall under the aforementioned cases for mandatory deletion, or if the PD cannot be deleted according to legal regulations as follows:

- (i) The law stipulates that data deletion is not permitted;
- (ii) PD is processed by competent state authorities for the purpose of serving the activities of state agencies as prescribed by law;
- (iii) PD has been made public in accordance with legal regulations;
- (iv) PD is processed to serve legal requirements, scientific research, or statistics in accordance with legal regulations;
- (v) In cases of emergency regarding national defense, national security, social order and safety, natural disasters, or dangerous epidemics; when there is a risk of threatening security or defense but not to the extent of declaring a state of emergency; prevention and combat of riots, terrorism, crimes, and legal violations;
- (vi) Necessary to respond to an emergency situation threatening the life, health, or safety of the Data Subject themselves or other individuals.

4.3. Data Subjects may request the Company to simultaneously exercise the rights permitted to the Data Subject by law.

## PHỤ LỤC

### EXPENDIX

(V/v: Phiếu yêu cầu thực hiện quyền của Chủ thể dữ liệu cá nhân của FiinGroup)

(Subject: Personal Data Subject Rights Request Form - FiinGroup)

Cộng hoà Xã hội Chủ nghĩa Việt Nam

Socialist Republic of Vietnam

Độc lập - Tự do - Hạnh phúc

Independence - Freedom - Happiness

### PHIẾU YÊU CẦU THỰC HIỆN QUYỀN CỦA CHỦ THỂ DỮ LIỆU CÁ NHÂN

CÔNG TY CỔ PHẦN FIINGROUP VIỆT NAM

REQUEST FORM EXERCISE OF DATA SUBJECT RIGHTS

VIETNAM FIINGROUP JOINT STOCK COMPANY

#### A. THÔNG TIN CÁ NHÂN YÊU CẦU THỰC HIỆN QUYỀN CỦA CHỦ THỂ DỮ LIỆU CÁ NHÂN

PERSONAL INFORMATION OF THE DATA SUBJECT REQUESTING THE EXERCISE OF RIGHTS

##### 1. Thông tin người yêu cầu / Requester Information

Là Chủ thể dữ liệu cá nhân/ Data Subject

Là người đại diện/giám hộ của Chủ thể dữ liệu cá nhân/ Authorized Representative/Guardian of the Data Subject<sup>1</sup>

Họ tên cá nhân yêu cầu thực hiện quyền của Chủ thể dữ liệu cá nhân: <i>Full name of the individual requesting the exercise of data subject rights:</i>		
Ngày sinh/ Day of birth:		
Giới tính/Gender:		
Thông tin đăng ký trên website thuộc FiinGroup <i>Registration information on the website belongs to FiinGroup.</i>	Số điện thoại/Phone number:  Email:	

<sup>1</sup> Trường hợp Người yêu cầu không phải là Chủ thể dữ liệu cá nhân thì phải có Giấy ủy quyền của Chủ thể dữ liệu cá nhân / If the applicant is not the subject of the personal data, they must have a letter of authorization from the subject of the personal data.

Số CMND/CCCD/ Thẻ Căn cước/ Hộ chiếu. <i>ID Card/ Citizen ID Card/ Identification Card/ Passport No.:</i>		Cấp ngày/issues on :  Tại/ At:
Hộ khẩu thường trú: <i>Permanent residence address:</i>		
Địa chỉ liên hệ: <i>Contact Address</i>		
Giấy ủy quyền số (nếu có): <i>Power of Attorney No. (if any):</i>		

## 2. Thông tin Chủ thể dữ liệu cá nhân/ Personal Data Subject Information<sup>2</sup>

Họ tên cá nhân yêu cầu thực hiện quyền của Chủ thể dữ liệu cá nhân: <i>Full name of the Data Subject exercising their rights:</i>		
Ngày sinh/ Day of birth:		
Giới tính/Gender:		
Thông tin đăng ký trên website thuộc FiinGroup <i>Registration information on the website belongs to FiinGroup.</i>	Số điện thoại/Phone Number:	
	Email:	
Số CMND/CCCD/ Thẻ Căn cước/ Hộ chiếu. <i>ID Card/ Citizen ID Card/ Identification Card/ Passport No.:</i>		Cấp ngày/issues on:  Tại/ At:
Hộ khẩu thường trú: <i>Permanent residence address:</i>		
Địa chỉ liên hệ:		

<sup>2</sup> Trường hợp Người yêu cầu là Chủ thể dữ liệu cá nhân thì không điền mục này. / *If the applicant is the subject of personal data, do not fill in this section.*

Contact Address

**B. YÊU CẦU THỰC HIỆN QUYỀN CỦA CHỦ THỂ DỮ LIỆU CÁ NHÂN/ DATA SUBJECT RIGHT REQUEST**

Là Chủ thể dữ liệu cá nhân (hoặc người đại diện/ người giám hộ của Chủ thể dữ liệu cá nhân), tôi yêu cầu thực hiện quyền của Chủ thể dữ liệu cá nhân như sau:

*As the Data Subject (or the authorized representative/guardian of the Data Subject), I hereby request to exercise my data subject rights as follows:*

Quyền của Chủ thể dữ liệu cá nhân (chọn ô phù hợp) <i>Rights of the Personal Data Subject (select the appropriate box)</i>	Mô tả/ describe	Yêu cầu cụ thể / Specific Requirements
<b>Quyền rút lại sự đồng ý</b> <i>Right to withdraw consent</i> <input type="checkbox"/>	Chủ thể dữ liệu cá nhân được quyền rút lại sự đồng ý của mình, trừ trường hợp luật có quy định khác.  <i>The subject of personal data has the right to withdraw their consent, unless otherwise provided by law.</i>	Nêu rõ sự đồng ý muốn rút quyền: <i>Clearly state your consent to withdraw your rights:</i>
<b>Quyền xem, chỉnh sửa hoặc yêu cầu chỉnh sửa DLCN:</b> <i>Right to access, rectify, or request rectification of personal data.</i> <input type="checkbox"/>	Chủ thể dữ liệu cá nhân được quyền Quyền xem, chỉnh sửa hoặc yêu cầu chỉnh sửa DLCN, trừ trường hợp luật có quy định khác.  <i>The subject of personal data has the right to view, edit, or request editing of personal data, except where otherwise provided by law.</i>	Nêu rõ phạm vi và mục đích/ <i>Clearly state the scope and purpose:</i>
<b>Quyền xóa dữ liệu</b> <i>Data deletion rights</i> <input type="checkbox"/>	Chủ thể dữ liệu cá nhân được xóa hoặc yêu cầu xóa DLCN của mình, trừ trường hợp luật có quy định khác.  <i>Personal data subjects have the right to delete or request the deletion of their personal data,</i>	Nêu rõ phạm vi và mục đích/ <i>Clearly state the scope and purpose:</i>

	<i>unless otherwise provided by law.</i>	
<b>Quyền hạn chế xử lý dữ liệu.</b> <i>Data processing restrictions</i> <input type="checkbox"/>	<p>Chủ thể dữ liệu cá nhân được yêu cầu hạn chế xử lý DLCN của mình, trừ trường hợp luật có quy định khác.</p> <p><i>The data subject is entitled to request the restriction of processing of their personal data, unless otherwise provided by law</i></p>	<p>Nêu rõ phạm vi và mục đích/ <i>Clearly state the scope and purpose:</i></p>
<b>Quyền cung cấp dữ liệu.</b> <i>Data access rights</i> <input type="checkbox"/>	<p>Chủ thể dữ liệu cá nhân được yêu cầu Bên Kiểm soát DLCN, Bên Kiểm soát và xử lý DLCN cung cấp cho bản thân DLCN của mình, trừ trường hợp luật có quy định khác.</p> <p><i>Personal data subjects are required to request the Data Controller and the Data Controller/Processor to provide their own personal data, unless otherwise provided by law.</i></p>	<p>Nêu rõ mục đích/ <i>State the purpose clearly:</i></p> <p>DLCN yêu cầu cung cấp:</p> <p><i>Personal data requires the following:</i></p> <p>Yêu cầu cung cấp DLCN lần thứ:</p> <p><i>Request for Personal data information number:</i></p> <p><input type="checkbox"/> Lần đầu/First time</p> <p><input type="checkbox"/> Khác.... (ghi rõ số lần đã yêu cầu cung cấp thông tin có nội dung nêu trên) / <i>Other.... (Please specify the number of times you have requested information with the above content)</i></p>
<b>Quyền phản đối xử lý dữ liệu/ Right to object to data processing.</b> <input type="checkbox"/>	<p>Chủ thể dữ liệu cá nhân được phản đối Bên Kiểm soát DLCN, Bên Kiểm soát và xử lý DLCN xử lý DLCN của mình nhằm ngăn chặn hoặc hạn chế tiết lộ DLCN hoặc sử dụng cho mục đích quảng cáo, tiếp thị, trừ trường hợp luật có quy định khác.</p> <p><i>Personal data subjects have the right to object to the Data Controller and the Data Controller/Processor processing their own data to prevent or limit</i></p>	<p>Nêu rõ mục đích/ <i>Specify the purpose:</i></p>

	<i>the disclosure of personal data or its use for advertising or marketing purposes, except where otherwise provided by law.</i>	
<b>Ngừng xử lý dữ liệu, chuyển giao thông tin/ Ceasing data processing and transferring information.</b> <input type="checkbox"/>	Chủ thể dữ liệu cá nhân được yêu cầu ngừng xử lý dữ liệu, chuyển giao thông tin của mình cho bên thứ ba, trừ trường hợp luật có quy định khác.  <i>The data subject is entitled to request the cessation of processing of their personal data and the transfer of their information to a third party, unless otherwise provided by law.</i>	Nêu rõ phạm vi/ Clearly state the scope:
<b>Thực hiện các biện pháp, giải pháp bảo vệ DLCN</b> <i>Implementing personal data protection measures and solutions.</i> <input type="checkbox"/>	Chủ thể dữ liệu cá nhân được yêu cầu Bên Kiểm soát DLCN, Bên Kiểm soát và xử lý DLCN thực hiện biện pháp, giải pháp bảo vệ DLCN, trừ trường hợp luật có quy định khác.  <i>The data subject is entitled to request the Personal Data Controller and the Personal Data Processor to implement personal data protection measures and solutions, unless otherwise provided by law</i>	Nêu rõ lý do/ Clearly state the reason:

#### LƯU Ý /NOTE

- Các yêu cầu thực hiện quyền của Chủ thể dữ liệu cá nhân là không tốn phí.  
*Requests to exercise the rights of the Data Subject are free of charge.*
- Các yêu cầu sẽ được thực hiện trong thời hạn quy định tại Quy trình xử lý yêu cầu của Chủ thể dữ liệu cá nhân sau khi nhận được yêu cầu hợp lệ của Chủ thể dữ liệu cá nhân, trừ trường hợp thỏa thuận khác.  
*Requests will be fulfilled within the timeframe specified in the Data Subject Request Handling Procedure upon receipt of a valid request, unless otherwise agreed.*
- Bằng cách gửi yêu cầu và ký tên dưới đây, Chủ thể dữ liệu cá nhân xác nhận các thông tin cung cấp tại Phiếu yêu cầu này là chính xác, và Chủ thể dữ liệu cá nhân đồng ý để FiinGroup bắt đầu quá trình xử lý

yêu cầu về thực hiện quyền theo đúng quy định pháp luật, quy định nội bộ của FiinGroup và **Chính sách bảo vệ dữ liệu cá nhân**. Trong trường hợp này, Chủ thể dữ liệu cá nhân chấp thuận tất cả các hậu quả, thiệt hại quy định tại Chính sách Bảo vệ dữ liệu cá nhân của Công ty Cổ phần FiinGroup Việt Nam được niêm yết công khai tại website <https://fiingroup.vn/>.

By submitting this request and signing below, the Data Subject confirms that the information provided in this Request Form is accurate and agrees for FiinGroup to commence the request processing in accordance with legal regulations, FiinGroup's internal policies, and the [Personal Data Protection Policy](#). In this case, the Data Subject accepts all consequences and damages as stipulated in the Personal Data Protection Policy of Vietnam FiinGroup Joint Stock Company, which is publicly posted on the website <https://fiingroup.vn/>.

....., ngày/date ....., tháng/month....., năm/year.....

**Người làm đơn xác nhận**

*Applicant's confirmation*

