



POLICY
FOR ONLINE VISITORS TO THE WEBSITE OF ACS LEGAL VIETNAM COMPANY LIMITED

ACS Legal Vietnam Company Limited (“**ACSV Legal**”) is committed to protecting personal data (“**PD**”) of users of our Website (i.e., <https://acsvlegal.com/>) (“**Website**”). This privacy policy (“**Policy**”) describes how ACSV Legal manages PD in compliance with the Vietnamese laws (“**Laws**”). We encourage you to read this Policy before you make any interaction with the Website so that you know and understand how and why we collect, use and process your PD.

I. Application of this Policy

1. PD means personal data, which is digital data or information in other forms expressed in symbols, text, digit, image, sound, or in similar forms, that identifies or helps identify a specific individual. PD includes Basic PD and Sensitive PD. PD, once de-identified, is no longer considered PD. PD, once encrypted, remains PD.
2. For the purposes of collecting your PD as set out below, we will collect your PD through the methods described in Section I.3 of this Policy. The PD collected may include:
 - a. “Basic Personal Data” (“**Basic PD**”) means PD identifying or background information of an individual, which is commonly and regularly used in transactions and social interactions, such as full name as recorded in the birth certificate, contact address, gender, telephone number, etc.
 - b. “Sensitive Personal Data” (“**Sensitive PD**”) means PD associated with an individual’s privacy that, when being infringed upon, shall cause a direct effect on the legitimate rights and interests of state agencies, organisations, or individual such as IP address information and/or personal location data as determined through location-based services.
3. By submitting information to or otherwise communicating with ACSV Legal, and explicitly consenting by taking the affirmative steps and/or actions on our Website or platforms as specifically instructed to you therein, you agree and consent to ACSV Legal and our related entities, affiliates and subsidiaries (individually and collectively, “**Affiliates**”), as well as their respective representatives and/or agents (collectively referred to herein as “**us**”, “**we**” or “**our**”) collecting, using and processing your PD in accordance with this Policy. “You” or “your” means any individual to whom the Laws apply and includes our Website’s users such as any employees of existing and prospective clients, investors, suppliers, agents, business partners, and/or prospective job applicants. For the purpose of this Policy, “existing and prospective clients” where “you” have been employed are referred to as “**Corporate Clients**”.
4. This Policy does not supersede or replace any other consents that you may have previously or separately provided to us in respect of your PD, and your consent to this Policy is in addition to any other rights that we already have under the Laws.

5. This Policy and your use of the Website shall be governed in all respects by the Laws.
6. From time to time, we may collect information about you from third-party sources and third-party data providers. We take reasonable efforts to ensure that such third parties have an appropriate legal basis and contractual arrangements in place to disclose such information to us. Examples of the information we may receive from other sources include demographic information, device information, location data and online behavioural data (such as information about your use of other websites, page views, search results and links). We use such information, either on a standalone basis or in combination with other information (including PD) collected by us, to enhance our ability to provide you with relevant content and marketing activities, as well as to develop and deliver more relevant updates, news, promotions, features and services to you.

II. Collection & consent

1. PD may be collected from you in one or more of the following ways:
 - a. when you visit our Website;
 - b. when you input the required information in the contact form on our Website;
 - c. when you post feedback or interact with our client service officers, *e.g.* via chatbox, emails, telephone calls, or directly via our social media platforms (which may be recorded for training, quality control, business and/or other lawful purposes);
 - d. when you request that we contact you, include you in an email or other mailing lists;
 - e. when you respond to our promotions, campaigns or other initiatives, or attend our events;
 - f. when you take part in any contest, survey or promotion conducted by us and/or our business partners (including submission of photographs);
 - g. when you submit your PD to us for any other reasons; and/or
 - h. when we collect your PD by other lawful means.
2. Unless permitted by the Laws, we will not collect, use or process your PD without your consent. We will limit our collection, use and processing of your PD to what is adequate and relevant to the purposes for which they are needed and to which you have consented. For the avoidance of doubt, unless mandated by the Laws or competent authorities, we will not gather or request you to furnish us with your personal identification number or, when applicable, a copy of your citizen identity card.
3. You warrant and represent to us that (a) PD which you disclose to us is accurate and complete; and (b) where you volunteer PD of another person to us, that you are authorized by such other person to disclose such PD to us, and that such PD is accurate and complete.

4. In order to provide any information to us or contact or interact with us through the relevant sections on the Website, you must be 16 years old or older. Access and use of our Website by anyone under the age of 16 is only permitted with the express permission of their legal representative. If we discover that for whatever reasons and via whatever means, PD of a child of less than 16 years old is submitted to us without appropriate consent, we reserve the right to erase and/or remove such PD from our system without any prior notification to the provider of such PD. Furthermore, under such circumstance, we will not owe any obligations to the data subject or the provider of the PD.
5. You are fully informed that we may collect and use your PD without your consent in the circumstances as set out by the Laws. If you decide to give us a partial consent on the collection and processing of your PD, kindly adhere to the instructions provided on our Website or through our relevant communication channels you are engaging with. If you need further assistance in this regard, you can send us a request to the email address of our Data Protection Officer as provided below in Section XII of this Policy. We will respond to you on how your case will be addressed and resolved. However, please note that, in order to maintain internal operational efficiency, we retain the right to decline involvement in communication with you if a full consent for PD processing is not provided.

III. Purposes for which we collect, use and disclose your PD

1. Your PD may be collected, used and/or processed for the following purposes:
 - a. to verify and process your personal particulars;
 - b. to explore potential business and/or employment opportunities with you;
 - c. to provide products and services to our Corporate Clients;
 - d. to respond and deal with enquiries, feedback, suggestions, complaints and other client-care matters or otherwise communicate with you;
 - e. to monitor or record phone calls and client-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
 - f. to send you information, legal updates, relevant announcements, and marketing and advertising materials in relation to our products and services, as well as invitations to events or activities that may be of interest to you;
 - g. to manage, develop and improve our business and operations to serve our Corporate Clients better, including maintaining and developing relationships with existing and prospective clients;
 - h. to carry out market research and client surveys;

- i. to conduct investigations or audits or carry out crime and fraud prevention and risk management activities;
 - j. to comply with legal and regulatory requirements, or as required by competent authorities;
 - k. to enforce our legal rights and obligations;
 - l. to facilitate business asset transactions (which may extend to any mergers, acquisitions or asset sales);
 - m. to ensure the proper display and optimal functioning of the Website on your device, including, without limitation, identifying and resolving issues that may affect the core functionality of the Website;
 - n. to carry out remarketing activities, including creating personalised advertising campaigns for users who have previously accessed services on the Website, based on their prior consent for such purposes;
 - o. for other purposes for which we have obtained your consent; and
 - p. for any other purposes reasonably necessary, ancillary or related to the above specified purposes.
2. Your PD may be disclosed for the purposes indicated above to our officers and employees, third parties, affiliates, service providers, advisors, which include without limitation, the following persons or entities:
- a. banks, credit card companies, and payment vendors;
 - b. debt collection agencies;
 - c. credit information companies;
 - d. logistics and courier services companies;
 - e. call centre services providers;
 - f. our business partners;
 - g. relevant government regulators or authorities or law enforcement agencies;
 - h. our insurers and advisors, including consultants, auditors and lawyers;
 - i. data hosting service providers and/or cloud computing service providers; and
 - j. any other party whom you authorise us to disclose your PD to.

Save for relevant government regulators and authorities or law enforcement agencies, we will ensure that such parties receiving your PD (i) are under a duty of confidentiality to us with respect to the use, holding, processing, retention and/or transfer of your PD; and (ii) have the need to know or handle such PD.

3. Likewise, we will only collect, use and/or process your PD for marketing purposes where you have consented to us doing so after being informed of such purposes and the consequences of providing consent.
4. Your PD may be transferred, stored and/or processed in a country or territory outside Vietnam for various purposes, including international client support, service improvements, backup, data storage, improvement of your experience with us, and the fulfillment of our legal business objectives.
5. Accordingly, you acknowledge and agree that the transfer, storage, and/or processing of your PD outside Vietnam may be necessary for the aforementioned purposes and any other purposes as described in this Policy and accordingly, you hereby consent to any such transfer, storage and/or processing of your PD outside Vietnam.
6. Any transfer of your PD outside of Vietnam will only be carried out where appropriate safeguards have been implemented.
7. If you would like to obtain further information regarding any such transfer of PD, please contact our Data Protection Officer with the contact details provided in Section XII of this Policy.

IV. Withdrawal of consent & access

1. You may withdraw your consent to our continued use and processing of your PD or seek access to your PD (to a reasonable extent and as permitted by the Laws) at any time by writing to our Data Protection Officer with the contact details provided in Section XII of this Policy.
2. In withdrawing your consent, you acknowledge that we may not be able to interact or continue interacting with you or provide or continue providing certain products and/or services to the Corporate Client you are affiliated with, and that we may cease such provision accordingly without any liability. You further acknowledge and agree that such withdrawal of consent does not affect our right to continue processing your PD in cases where such processing is permitted by law without your consent. Please note that, depending on the nature and level of complexity of your request, it may take up to 35 days to complete the handling of your request to withdraw consent, including the cessation of the collection and processing of your PD and other necessary processing steps, including requesting relevant third parties, as mentioned in Section III.2 of this Policy, to also cease collecting and processing your PD accordingly.
3. We reserve the right to charge a reasonable administrative fee for carrying out your request, where permitted to under the Laws.

V. Accuracy & correction

1. We will endeavour to ensure that your PD we use is sufficiently accurate and complete in making any decision that impacts you.
2. To help us maintain the accuracy of your PD, we encourage you to inform us when there are any changes to your PD which you have provided us by writing to the Data Protection Officer with the contact details provided in Section XII of this Policy. Please note that, depending on the nature and level of complexity of your request, it may take up to 25 days to complete the handling of your request to correct your PD, including updating or correcting your PD in our systems and other necessary processing steps, including requesting relevant third parties, as mentioned in Section III.2 of this Policy, to also carry out the correction of your PD accordingly.

VI. Protection, Policies and Procedures

1. We will endeavour to protect your PD in our possession or control against risks of unauthorised access, collection, use, disclosure, copying, modification, disposal or destruction, through reasonable and appropriate security measures. We strive to ensure that our systems are secure and that they meet industry standards. To prevent unauthorised access, maintain data integrity and confidentiality, and ensure the correct use of information, we have put in place appropriate physical, electronic and managerial procedures to safeguard and secure the PD we collect, including, without limitation, the implementation of industry-standard security measures in conjunction with carefully designed security processes developed by our Information Technology Department. Notwithstanding our security measures for protecting your PD, you acknowledge that no data transmission over the Internet is completely secure and by providing your PD, you are transmitting information at your own risk.
2. In order to fulfil our obligations under the Laws, we may be required to conduct a data protection impact assessment report regarding the collection and processing of your PD. This assessment report will be prepared in accordance with legal requirements and may need to be submitted to the relevant competent authorities as mandated by the Laws. Our aim is to ensure compliance with the legal framework and safeguard the privacy and security of your PD as prescribed by the Laws.

VII. Retention and Deletion of PD

1. We will retain your PD for as long as it is necessarily required or relevant for business or legal purposes.
2. You are entitled to request the erasure or removal of your PD in accordance with the Laws.
3. We will carefully assess the grounds for your deletion request and take appropriate measures, including technical measures, to address it, unless we are entitled to refuse the deletion of your PD in accordance with the Laws. Please note that, depending on the nature and level of complexity of your request, it may take up to 50 days to complete the handling of your request to delete your PD, including deleting or destroying your PD from our systems and other necessary processing steps,

including requesting relevant third parties, as mentioned in Section III.2 of this Policy, to also delete, destroy, or restrict the processing of your PD accordingly.

4. We will cease to retain and delete or anonymise your PD once the purpose of collection has been fulfilled, or after we confirm your request for erasure, unless we are mandated to retain your PD under the Laws in some specific circumstances.
5. However, there are statutory exceptions for the deletion of your PD even upon your request. In these circumstances, we may retain this type of information for a longer period than the standard retention period, as permitted by the Laws, even if further data processing is not directly related to the original purpose of collection.

VIII. Other rights to Your PD

Regarding your PD, amongst others, you have the following entitlements as set out by the Laws:

- a. Be provided with your PD.

You have the right to request a copy of the PD we hold about you. Any such request should be directed to our Data Protection Officer as provided below in Section XII of this Policy.

If you are disabled and cannot complete the request on your own, please contact our Data Protection Officer as provided below in Section XII of this Policy so that we may provide appropriate assistance in enabling you to exercise your rights.

- b. Restrict or object to the continued collection and processing your PD.
- c. Request ACSV Legal to implement measures and solutions to protect your PD in accordance with the Laws.

Upon receipt of your requests to exercise the rights set out above, the review and handling of such requests will be carried out in accordance with the Laws.

IX. Processing of PD of individuals declared deceased, missing, having lost or having limited civil act capacity, or having difficulties in cognition or behavioral control

In the event that you are declared deceased, missing, having lost or having limited civil act capacity, or having difficulties in cognition or behavioral control by a competent authority in accordance with the Laws, we acknowledge the importance of protecting your PD. We recognise the sensitive nature of, and privacy considerations surrounding, such circumstances, and we are committed to maintaining the confidentiality of your information. Accordingly, we will only continue to process your PD where there is a legal basis and where such processing is carried out in accordance with the procedures prescribed by the Laws from time to time.

X. Cookies

1. As with many other websites, ACSV Legal and our service providers use cookies to collect information about visitors' use of the Website. We gather information on our Website's activities, such as IP address of the visitors, browsing history, data on the number of visitors, the pages they visit, the duration of their stay, etc. Such information is collected on an aggregate, anonymous basis, and gathered through the use of web server logs and cookies. We may collect your PD through your IP address and upon your input of your PD in the contact form on our Website.
2. Cookies are small bits of data automatically stored in the hard drive of the end user and are commonly used to track preferences in relation to the subject of such website. If you enable these cookies, then your web browser will store a text file (piece of code) on your device. You may wish to set your web browser to notify you of a cookie placement request or refuse to accept cookies by modifying relevant internet options or browsing preferences of your computer system, but in doing so you may not be able to utilise or activate certain available functions on our website.
3. By accessing and using our Website, products and services, you consent to the storage of cookies, other local storage technologies, beacons and other information on your devices. You also consent to the access of such cookies, local storage technologies, beacons and information by us or our representatives or agents. Should you wish to dissent, kindly follow the specific instructions provided on the Website or the cookie notification.

XI. Third party links and products on our services

Our Website may link to third-party websites and services, including those of our partners, advertisers and our Affiliates, as well as other third-party websites and services that are outside our control. For example, we may enable you to share certain materials on our products and/or services with others through social networking services such as Facebook and LinkedIn. We are not responsible for the security or privacy of any information collected by third-party websites or other services. You should exercise caution, and review the privacy statements applicable to the third-party websites and services that you use. To the fullest extent permitted under the Laws, we cannot be responsible for a third party's acts, omissions, data policies or their use of cookies nor the content or security of any third-party websites, even if linked to our Website. Any such liability is expressly disclaimed and excluded.

XII. Contact us

We have appointed Data Protection Officer(s) to oversee our compliance with the Laws. Should you have any query, request or feedback relating to your PD, please contact us at the following details:

Data Protection Officer

ACS Legal Vietnam Company Limited

Unit 911, Level 9, Lim Tower 3, 29A Nguyen Dinh Chieu, Sai Gon Ward, Ho Chi Minh City, Vietnam

Full name: Ms. Nguyen Le Hoang Linh

Email: linh.nguyen@acsvlegal.com

XIII. Update to the Policy

We reserve the right to modify or update this Policy from time to time. Subject to your rights under the Laws, you agree to be bound by the prevailing terms of this Policy as updated from time to time. The date stated at the bottom of this Policy indicates the last time this document was revised. We encourage you to check back regularly for the latest version of this Policy.

This Policy was last updated on 1 June 2026.