
NOTICE

REGARDING THE PROCESSING OF PERSONAL DATA

Dear: Valued customers, prospective customers, partners, job applicants, employees, and other relevant individuals (hereinafter referred to as the “**Data Subjects**”),

First of all, **Welcome Debt Trading Co. Ltd** and our subsidiaries (collectively referred to as “**Welcome DTC,**” the “**Company,**” or “**we**”) would like to express our sincere gratitude to our valued customers, prospective customers, partners, job applicants, employees, and other relevant individuals for their trust and continued support over the years.

In compliance with Decree No. 13/2023/ND-CP dated April 17th, 2023, on Personal Data Protection, we hereby respectfully issue this **Notice regarding the processing of personal data** (hereinafter referred to as the “**Notice**”) with the following contents:

1. Definitions

Personal data	:	refers to information in the form of symbols, letters, numbers, images, sounds, or similar formats in an electronic environment that is associated with a specific individual or helps identify a specific individual. Personal data includes both basic personal data and sensitive personal data.
		Information that helps identify a specific individual is information generated from an individual's activities which, when combined with other stored data or information, can be used to identify that specific individual.
Customer	:	refers to an individual whose information is associated with debts purchased by the Company from the debt seller, including the borrower and related parties listed in the credit agreement.
Job Applicant	:	refers to an individual who has submitted an application to become an employee, intern, or to hold any other position within the Welcome DTC system.
Employee	:	refers to any individual who has an employment or working relationship with the Company under a probationary contract, labor contract, internship agreement, or other agreements in accordance with applicable laws.

Related Individuals : refers to individuals related to the Data Subject, including but not limited to dependents, spouses, children, biological parents, adoptive parents, friends, referees, emergency contacts, and/or other persons having a relationship with the Data Subject.

Processing of Personal Data : refers to one or more actions performed on personal data, such as collection, recording, analysis, verification, storage, modification, disclosure, combination, access, retrieval, extraction, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction of personal data, or other related actions.

2. Types of Personal Data Processed

2.1. Basic Personal Data

- Full name, including middle name and other names (if any);
- Date of birth; date of death or disappearance;
- Gender;
- Place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown, contact address;
- Nationality;
- Personal images;
- Phone number, identity card number, personal identification number, passport number, driver’s license number, vehicle license plate number, personal tax code, social insurance number, health insurance card number;
- Marital status;
- Information about family relationships (parents, children);
- Information about personal bank accounts; personal data reflecting activities and history on cyberspace;
- Other information linked to or helping to identify a specific individual that is not sensitive personal data.

** Note: Data Subjects are responsible for ensuring that referenced individuals have been fully informed about the relevant data processing purposes and the processing of personal*

data in accordance with applicable laws, and have obtained consent from those individuals before providing such information to Welcome DTC.

2.2. Sensitive Personal Data

- Political opinions, religious beliefs;
- Health status and private life recorded in medical records, excluding blood type information;
- Information related to racial or ethnic origin;
- Information about inherited or acquired genetic characteristics of the individual;
- Information about physical attributes and unique biological characteristics of the individual;
- Information about the individual’s sexual life and sexual orientation;
- Criminal data and offenses collected and stored by law enforcement agencies;
- Customer information of credit institutions, foreign bank branches, payment intermediary service providers, and other authorized organizations, including: customer identification information as prescribed by law, account information, deposit information, asset deposit information, transaction information, information about organizations or individuals acting as guarantors at credit institutions, bank branches, and payment service providers;
- Location data of individuals determined through location-based services;
- Other personal data specified by law as sensitive and requiring necessary security measures.

3. Purposes of Processing Personal Data of the Data Subject

Welcome DTC processes the personal data of the data subject for the following purposes (hereinafter referred to as the “**Processing Purposes**”):

3.1. General Purposes:

- Identify and verify/authenticate the identity of the Data Subject and the accuracy of the personal data provided by the Data Subject;
- Fulfill our obligations as required by law at any given time (e.g., compliance with laws on Taxation / Anti-Money Laundering, Counter-Terrorism Financing, and Proliferation

of Weapons of Mass Destruction / related-party transaction controls / FATCA; risk management and auditing, etc.);

- Statistics, reconciliation, verification, and data management;
- Manage and ensure workplace security and safety;
- Handle complaints and disputes;

3.2. In Cases Where the Data Subject is a Customer

- The general purposes mentioned above;
- Prepare and submit reports to competent state authorities, the Vietnam National Credit Information Center (CIC), other legally authorized credit information organizations, and relevant organizations or individuals for the purpose of data processing;
- Utilize the customer’s credit information services for the purpose of customer assessment and other purposes as prescribed by law from the Vietnam Credit Information Center (CIC) and other lawful credit information organizations in Vietnam;
- Provide the Data Subject with access, usage rights, and other support related to electronic information portals, social media pages, debt payment support platforms, management platforms, or any other communication channels or methods used by Welcome DTC to interact with the Data Subject; carry out operation, management, analysis, evaluation, and related improvements;
- Customer care, including informing the Data Subject about debts at Welcome DTC so that the Data Subject has the information and can fulfill payment obligations; reconcile and collect public information about the Data Subject from social media platforms;
- Contact and communicate with the Data Subject regarding all matters related to the Data Subject’s debts at Welcome DTC, agreements, relationships between the Data Subject and Welcome DTC, and the content of the Regulations;
- Receive, manage, and monitor information related to debts purchased from the debt seller (serving the identification of debts, obligation status, and associated personal information);
- Conduct debt collection activities in accordance with legal regulations (including assessing repayment capacity, sending notices, working with customers, etc.);
- Verify identity, contact information, and related information to serve negotiations, support, or work with the customer;

- Comply with reporting, reconciliation, and information provision obligations as required by competent state authorities or legal regulations;
- Store, review, inspect, and handle complaints and disputes related to debts or personal data information;
- Prevent risks, fraud, and ensure information security in debt collection activities and company system operations.

3.3. In Cases Where the Data Subject is a Partner

- The general purposes mentioned above;
- Signing and/or terminating related contracts;
- Performing rights and obligations under the signed contracts (e.g., sale of goods, service use, payment, warranty, etc.);
- Providing notifications about relevant information, policies, and regulations of the Company.

3.4. In Cases Where the Data Subject is a Candidate/Employee

- The general purposes mentioned above;
- Monitor, ensure, and protect public security and safety; prevent and mitigate threats to the life, health, property, and interests of WELCOME DTC and the Data Subject;
- Assess the suitability of candidates for any current or future recruitment positions at our Company;
- Perform rights and obligations arising from or related to the labor contract signed between the candidate and us (if any);
- Human resource management (including but not limited to: recruitment assessment; labor management books, human resource management systems; appointment, dismissal; signing and terminating labor contracts; salary, bonuses, benefits; surveys, evaluations, development and adjustment of salary scales; training and professional development; management, operation, supervision; rewards and labor discipline handling, material responsibilities; occupational safety and hygiene; granting or revoking system access rights/accounts; collecting CIC personal credit information reports to serve HR management, etc.); cập hoặc hủy quyền/tài khoản truy cập hệ thống; thu thập báo cáo thông tin tín dụng cá nhân CIC nhằm phục vụ công tác quản lý nhân sự v.v.);

- Fulfill our obligations to employees as prescribed by law at any given time (including but not limited to social insurance, health insurance, unemployment insurance; health check-ups for employees; etc.).

** The above purposes may continue to apply even if the candidate withdraws their application at Welcome DTC, for a reasonable period thereafter (including during the period allowing Welcome DTC to exercise any rights or obligations with the candidate, competent state agencies, or as required by law).*

4. Methods of Personal Data Processing

4.1. Personal Data Processing

Welcome DTC may collect the Data Subject’s personal data through the following forms:

- From the lawful transfer of debts from credit institutions (banks, finance companies);
- From related persons through valid authorization from the Data Subject;
- Directly from the Data Subject;
- From exchanges, communications, and interactions with the Data Subject;
- From Welcome DTC’s Personal Data Processors, publicly available data sources, authorized state agencies’ data sources, and other sources;
- From other lawful means of collecting Personal Data;
- Images of the Data Subject and information obtained from security systems (e.g., audio recordings, video recordings in areas with CCTV surveillance cameras—including but not limited to meeting rooms, corridors, entrances/exits, and parking lots) for the purpose of protecting security, social order and safety, and the lawful rights and interests of organizations and individuals as prescribed by law without requiring the Data Subject’s consent;
- Other lawful methods in accordance with our policies or regulations at each given period.

4.2. Deletion of the Data Subject’s Personal Data

Welcome DTC will irreversibly delete the Data Subject’s personal data in the following cases:

- Data processing is not conducted for the intended purpose;
- The purpose of processing the personal data, to which the Data Subject has consented, has been fulfilled;

- The storage of personal data is no longer necessary for Welcome DTC’s operations;
- Welcome DTC is dissolved, ceases operations, declares bankruptcy, or terminates its business activities according to legal regulations.

4.3. Transfer of Personal Data Abroad

Welcome DTC may transfer or grant access to the Data Subject’s personal data to foreign organizations or management units, in accordance with the Processing Purposes that the Data Subject has consented to. In all cases involving the transfer of personal data abroad, Welcome DTC will strive to implement appropriate measures to ensure the protection of the Data Subject’s personal data.

5. Individuals/Organizations with the Right to Access the Data Subject’s Personal Data

Welcome DTC will not disclose the Data Subject’s personal data to any third party except those related to the Processing Purposes. Such related parties include:

- Parent companies, subsidiaries identified by Welcome DTC from time to time;
- Service providers or other third parties involved in carrying out Personal Data Processing activities on behalf of or authorized by Welcome DTC to serve the Processing Purposes (as “Data Processors”), including but not limited to:
 - ✓ Recruitment partners, candidate search, job referral agencies;
 - ✓ Cloud storage and IT service providers;
 - ✓ Advisors and consultants, such as legal consultants;
 - ✓ Notary offices, enforcement agencies;
 - ✓ Entities processing debt payment transactions;
 - ✓ Debt notification service providers;
 - ✓ Technology infrastructure providers;
 - ✓ Call quality monitoring units.
- Competent state authorities;
- Vietnam National Credit Information Center (CIC) or any agency or organization established by the State Bank of Vietnam or any other authority relevant to Welcome DTC;

- Entities providing credit information services, credit assessment units; credit scoring units; credit rating agencies; insurance companies; insurance brokers; and other credit-related service providers;
- Other third parties deemed necessary by Welcome DTC for the Processing Purposes or as required by law.
- The Data Subject agrees to and/or authorizes the Company to: (i) provide the Data Subject’s personal data to other organizations or individuals (including Personal Data Processors, third parties, credit information companies, and any individuals or organizations that have entered into contracts or agreements with the Company to perform one or more tasks or duties related to the processing of personal data, as well as individuals or organizations to whom the Company is legally required to report or provide such data), unless otherwise provided by law; and/or (ii) provide the Data Subject’s personal data to the aforementioned organizations or individuals on behalf of the Data Subject.

6. Potential Unintended Consequences and Damages

Data subjects are advised that, despite Welcome DTC’s best efforts to protect personal data in accordance with applicable laws and regulations, it is impossible to completely eliminate all risks during data processing. The transmission of information via the Internet or Welcome DTC’s internal information systems carries inherent risks arising from force majeure events or incidents such as cyberattacks, cyber terrorism, unauthorized cyber espionage, disruption of data processing, or personal data leakage. In such cases, Welcome DTC will promptly take necessary actions to prevent, mitigate, and minimize any potential damages to personal data and will cooperate with relevant state authorities to handle any violations. Data subjects acknowledge that, to the extent Welcome DTC has implemented reasonable measures to prevent such risks, Welcome DTC shall not be held liable for any damages resulting from the actions of third parties that adversely affect personal data without fault on the part of Welcome DTC.

7. Commencement and Termination of Data Processing

Welcome DTC processes the personal data of the data subject from the moment the data subject’s consent to such processing is obtained. The personal data will be processed for the period necessary to achieve the processing purposes and to comply with relevant legal requirements.

8. Rights and Obligations of the Data Subject:

a. Rights of the Data Subject

- **Right to be Informed:** The data subject has the right to be informed about the processing of their personal data, except where otherwise provided by law.

- **Right to Consent:** The data subject has the right to give or withhold consent for the processing of their personal data, except in cases specified in Article 17 of Decree 13/2023/ND-CP on Personal Data Protection.
- **Right of Access:** The data subject has the right to access, view, edit, or request correction of their personal data, except where otherwise provided by law.
- **Right to Withdraw Consent:** The data subject has the right to withdraw their consent at any time, except where otherwise provided by law.
- **Right to Erasure:** The data subject has the right to delete or request the deletion of their personal data, except where otherwise provided by law.
- **Right to Restrict Processing:** The data subject has the right to request restriction of the processing of their personal data, except where otherwise provided by law; the restriction must be implemented within 72 hours after the data subject’s request for all personal data subject to restriction, unless otherwise provided by law.
- **Right to Data Portability:** The data subject has the right to request the Data Controller and Data Processor to provide their personal data, except where otherwise provided by law.
- **Right to Object to Processing:** The data subject has the right to object to the Data Controller and Data Processor processing their personal data to prevent or limit disclosure or use for advertising and marketing purposes, except where otherwise provided by law; the Data Controller and Data Processor shall comply with the data subject’s request within 72 hours of receipt, unless otherwise provided by law.
- **Right to Complain, Report, and Litigate:** The data subject has the right to file complaints, reports, or lawsuits in accordance with the law.
- **Right to Claim Compensation:** The data subject has the right to claim compensation under the law when their personal data protection rights are violated, except where otherwise agreed by the parties or provided by law.
- **Right to Self-Protection:** The data subject has the right to self-protection under the Civil Code, other relevant laws, and this Decree, or may request competent authorities or organizations to carry out measures to protect civil rights in accordance with Article 11 of the Civil Code.

b. Obligations of the Data Subject

- Protect their own personal data; request related organizations and individuals to protect their personal data.
- Respect and protect the personal data of others.

- Provide complete and accurate personal data when consenting to the processing of their personal data.
- Participate in communication and dissemination of skills for personal data protection.
- Comply with the laws on personal data protection and participate in preventing and combating violations of personal data protection regulations.

9. Contact Information

If the data subject wishes to exercise their rights or has any questions, requests for support, concerns, or complaints related to this notice or Welcome DTC’s personal data processing activities, the data subject may contact Welcome DTC using the following contact details:

WELCOME DEBT TRADING CO., LTD

- **Address:** 473 Dien Bien Phu Street, Ward 25, Binh Thanh District, Ho Chi Minh City, Vietnam
- **Tel:** 028 3622 6879
- **Email:** compliance@welcomevina.vn (Bộ phận Bảo vệ dữ liệu cá nhân/ Personal Data Protection Department)

10. Updates and Amendments to the Personal Data Processing Notice

Welcome DTC may revise and update this personal data processing notice from time to time. The latest version of the notice will be publicly available on the Company’s website: <https://welcomedtc.vn>