

**GENERAL TERMS AND CONDITIONS ON PERSONAL DATA PROTECTION AT
WELCOME DEBT TRADING CO., LTD.**

Depending on Welcome DTC's role in each specific situation, whether (i) Data Controller; (ii) Data Processor; or (iii) Data Controller and Processor, we will exercise the corresponding rights and responsibilities in accordance with applicable laws.

1. PERSONAL DATA

1.1. "**Personal Data**" refers to information in the form of symbols, written characters, numbers, images, sounds, or similar formats in electronic environments that are associated with or help identify the Data Subject. The Personal Data processed by WELCOME DTC may include both basic Personal Data and sensitive Personal Data as defined by applicable laws, depending on the relationship between WELCOME DTC and the Data Subject, including but not limited to the following information:

No.	Type of data	
	Basic Personal Data	Sensitive Personal Data
1.1.	Last name, middle name, and full birth name, any other name(s) (if applicable);	Political views, religious beliefs
1.2.	Date of birth; date of death or disappearance;	Health status and personal life recorded in medical records, excluding blood type information;
1.3.	Gender;	Thông tin liên quan đến nguồn gốc chủng tộc, nguồn gốc dân tộc;
1.4.	Place of birth, place of birth registration, permanent address, temporary address, current residence, hometown, contact address;	Information about inherited or acquired genetic traits of the individual;
1.5.	Nationality;	Information about the individual's physical attributes and unique biological characteristics;

No.	Type of data	
	Basic Personal Data	Sensitive Personal Data
1.6.	Personal images, videos, audio recordings, and/or other information obtained by WELCOME DTC from surveillance systems, electronic devices, or electronic means;	Information about the individual's sexual life and sexual orientation;
1.7.	Phone number, ID card number, citizen identification number, personal identification number, passport number, driver's license number, vehicle registration number, personal tax identification number, social insurance number, health insurance card number, personal email address, bank account number; issuance date and place of issuance for each of these documents;	Criminal data, criminal behavior collected and stored by law enforcement agencies;
1.8.	Marital status	Identification information as required by law, account information, deposit information, information about entrusted assets, transaction information;
1.9.	Information about family relationships (parents, children);	Location data determined through location-based services;
1.10.	Educational background, professional skill level	Customer Credit Information retrieved from The Vietnam Credit Information Center (CIC) and other credit information or organizations in Vietnam;
1.11.	Educational history, including but not limited to the name and address of educational institutions, field of study, academic years, graduation year, as well	Other information in accordance with legal requirements.

No.	Type of data	
	Basic Personal Data	Sensitive Personal Data
	as information about degrees and/or certificates/certifications obtained during the period of study and/or training, professional development;	
1.12.	Work history, including but not limited to information about places and periods of employment, job descriptions, and achievements or results attained in previous and current positions;	
1.13.	Personal records, including but not limited to criminal record, health check-up certificate, résumé, and other related documents for the personnel management requirements of WELCOME DTC;	
1.14.	Information about the individual's account number; personal data reflecting online activities and activity history.	

1.2. "**Data Subject**": refers to an individual reflected in the Personal Data, including all customers using services/products at Welcome DTC, employees, and other individuals who have legal relationships with Welcome DTC.

2. TIME & METHOD OF DATA PROCESSING

2.1. **Data processing time:** When the data subject provides personal data.

2.2. **Method of data processing:**

2.2.1. WELCOME DTC (including any third-party data processors used by WELCOME DTC) may collect Personal Data through interaction channels with the Data Subject such as:

- a. WELCOME DTC meets the Data Subject in person;
 - b. WELCOME DTC communicates with the Data Subject via phone, regardless of whether it has a recording feature or not;
 - c. The Data Subject provides Personal Data in registration forms, documents sent to WELCOME DTC, whether in paper format or data messages;
 - d. The Data Subject interacts with WELCOME DTC via messages, emails, social media platforms, application submission platforms, management platforms, or any other information channel or method.
- 2.2.2. In addition, WELCOME DTC may collect Personal Data from various other sources such as:
- a. Through inheriting all rights and obligations of the Seller as stipulated in the Credit Agreement, including documents proving the Customer's consent;
 - b. Surveillance camera systems, audio recordings, or any other means placed at the headquarters, subsidiaries, or service introduction points of WELCOME DTC;
 - c. Publicly available sources, authorized organizations, competent authorities;
 - d. Other third parties ensuring that they have obtained the Data Subject's consent and/or comply with legal regulations;
 - e. Other sources where the collection of information is required or permitted by law.
- 2.2.3. To the extent permitted by law, WELCOME DTC may store Personal Data at any location, including on cloud storage solutions. WELCOME DTC has the right (but not the obligation) to store Personal Data for as long as necessary to achieve the purposes of processing Personal Data outlined in Section III of this Regulation, unless the storage period is longer as required by law, WELCOME DTC's regulations, or an agreement between the Data Subject and WELCOME DTC.
- 2.2.4. To ensure the accuracy and completeness of Personal Data, WELCOME DTC will proactively correct and update the Personal Data when errors are discovered, changes occur, or as required by competent government authorities, without the need to notify or obtain the Data Subject's consent.

3. PURPOSE OF PERSONAL DATA PROCESSING

The purpose of WELCOME DTC processing Personal Data depends on the relationship between WELCOME DTC and the Data Subject, including but not limited to:

- 3.1. Identifying customers, collecting, updating, and verifying customer identification information in accordance with anti-money laundering regulations;
- 3.2. Checking the debt payment conditions for the Data Subject, such as determining the personal information of the Data Subject, assessing financial status, credit history, and repayment ability.
- 3.3. Checking and verifying the work and study history, health status, and other requirements the Data Subject must meet according to WELCOME DTC's recruitment and human resources management requirements;
- 3.4. Exercising any rights and obligations of WELCOME DTC and/or the Data Subject under the relevant agreement between WELCOME DTC and the Data Subject and/or legal regulations, including WELCOME DTC's right to collect debts;
- 3.5. Resolving requests, complaints, and disputes from the Data Subject;
- 3.6. Recruitment, promoting the recruitment brand; arranging, managing, operating, supervising labor, rewarding, handling labor discipline violations, and resolving labor disputes;
- 3.7. Customer care, including informing the Data Subject about debts with WELCOME DTC to provide them with information and fulfill payment obligations; verifying and collecting public information of the Data Subject on social media platforms;
- 3.8. Providing the Data Subject with access to, use of, and other related support for electronic information pages, social media platforms, debt payment support platforms, management platforms, or any other communication methods WELCOME DTC uses to interact with the Data Subject; performing operation, management, analysis, evaluation, and improvements related to these platforms;
- 3.9. Exploiting the customer's credit information services for purposes of evaluating the customer and other purposes as required by law from the Vietnam Credit Information Center (CIC) and other legitimate credit information organizations in Vietnam.
- 3.10. Prepare, send reports, and provide them to the competent state authorities, the Vietnam National Credit Information Center (CIC), other organizations authorized to operate credit information services under the law, and organizations or individuals related to the data processing purposes mentioned in Section V of the Regulations;
- 3.11. Risk assessment and management; detection, investigation, and prevention of fraud, deception, and criminal activities;

- 3.12. Audit and verification;
- 3.13. To establish, manage, and maintain the cooperative relationship between WELCOME DTC and the Data Subject, and to understand the current and future investment and business cooperation needs of the Data Subject with WELCOME DTC;
- 3.14. To monitor, ensure, and protect public safety and security, and to prevent or minimize threats to the life, health, property, and interests of WELCOME DTC and the Data Subject;
- 3.15. To contact and communicate with the Data Subject regarding all matters related to the Data Subject's debt with WELCOME DTC, the agreements and relationships between the Data Subject and WELCOME DTC, and the contents of this Policy;
- 3.16. To monitor and supervise the repayment process of customers through operational measures such as contacting and exchanging information with customers, and with their family members, including:
 - 3.17. Immediate family members, relatives, and others with direct blood relations according to family law regulations; and
 - 3.18. Other cases determined reasonably by WELCOME DTC in accordance with the law, even if the customer has not provided such family members' information to WELCOME DTC, but WELCOME DTC has grounds to identify them based on the Data Subject's Personal Data and/or Related Individuals' Data that WELCOME DTC obtains at any time through any legal source;
- 3.19. To enforce and protect any rights of WELCOME DTC according to the law;
- 3.20. To update and improve the accuracy and completeness of the Personal Data being processed;
- 3.21. To comply with the internal policies of WELCOME DTC and/or applicable laws and regulations and/or requirements from competent state agencies;
- 3.22. For purposes under agreements between WELCOME DTC and related organizations or individuals as specified in Section V of this Policy, to enable the Data Subject to fulfill their payment obligations at WELCOME DTC and/or to serve the operation, business, and human resource management activities of WELCOME DTC, including legitimate purposes according to the regulations of these organizations or individuals from time to time;
- 3.23. For any other reasonable purposes related to the aforementioned purposes and/or required or permitted by law and/or with the consent of the Data Subject.

4. TRANSFER OF PERSONAL DATA ABROAD

- 4.1. In order to fulfill the purposes of personal data processing in these Terms and Conditions for Personal Data Protection, the Company may need to provide/share customer personal data to third parties related to the Company, and these third parties may be located in Vietnam or any other location outside of Vietnam.
- 4.2. When providing/sharing personal data abroad, the Company will require the recipient party to ensure that the customer's personal data being transferred to them will be kept secure and confidential. WELCOME DTC ensures compliance with legal obligations and regulations related to the transfer of customer personal data.

5. ORGANIZATIONS AND INDIVIDUALS RELEVANT TO THE PURPOSE OF DATA PROCESSING

To achieve the purposes of processing Personal Data outlined in Section III of the Regulation, WELCOME DTC may provide Personal Data to relevant organizations or individuals, including but not limited to:

No.	Recipients of Personal Data	Describe
5.1.	Subsidiaries and affiliates of Welcome DTC	The parent companies and subsidiaries as designated by Welcome DTC at different points in time.
5.2.	Third parties assisting in the verification of Data Subject information	<ul style="list-style-type: none"> • Các đơn vị có chức năng cung cấp dịch vụ thông tin tín dụng, đánh giá tín nhiệm; các đơn vị chấm điểm tín dụng; các tổ chức xếp hạng tín dụng; công ty bảo hiểm; công ty môi giới bảo hiểm; và các nhà cung cấp dịch vụ khác về tín dụng; • Trung tâm Thông tin tín dụng Quốc gia Việt Nam (CIC) hoặc bất kỳ cơ quan hoặc tổ chức nào được thành lập bởi Ngân hàng Nhà nước Việt Nam hoặc bất kỳ cơ quan nào khác có thẩm quyền đối với Welcome DTC.

No.	Recipients of Personal Data	Describe
5.3.	Competent authority	<ul style="list-style-type: none"> • Competent authorities requesting the provision of information in accordance with the law; • Any court, arbitral tribunal, judicial authority, or enforcement agency with jurisdiction, or as required to enforce obligations from Welcome DTC; • Any individual, competent authority, regulatory body, or third party to whom Welcome DTC is authorized or required to disclose in accordance with the laws of any country or under any contract or commitment with a third party and Welcome DTC.
5.4.	Service providers to Welcome DTC and service partners collaborating with Welcome DTC	Business partners and affiliated partners collaborating with Welcome DTC to support the Company's business operations.
5.5.	A third party authorized by the Data Subject	<ul style="list-style-type: none"> • Provide to any person acting on behalf of the Data Subject (payee, beneficiary, designated account-related persons, intermediary banks, confirming banks, correspondent banks, etc...); • Any person notified, authorized, or permitted by the Data Subject to provide information necessary for the fulfillment of the payment obligations on behalf of the Data Subject.
5.6.	Another third party	<ul style="list-style-type: none"> • Other relevant parties deemed necessary by Welcome DTC to meet and protect the

No.	Recipients of Personal Data	Describe
		<p>legal rights and interests of the Data Subject;</p> <ul style="list-style-type: none"> • Advisors of the Data Subject or Welcome DTC, including accountants, auditors, lawyers, and financial consultants; • Parties involved in the purchase or sale of debts or assets of Welcome DTC; • Any individual intending to pay any outstanding amounts on any of the Data Subject's debts with Welcome DTC; • Other data processors acting with the consent of the Data Subject; • Data processors approved by the Data Subject when fulfilling payment obligations on debts with Welcome DTC.

6. NOTICE OF PERSONAL DATA PROCESSING

The Data Subject confirms that, by accepting these terms, the Data Subject has been informed by WELCOME DTC, is aware of, and agrees to all the information that must be disclosed prior to the processing of Personal Data by WELCOME DTC, as detailed in the general terms and conditions regarding personal data protection. The Data Subject agrees that WELCOME DTC is not required to provide further notice before processing Personal Data.

7. RIGHTS AND OBLIGATIONS OF THE DATA SUBJECT

7.1. Right to be Informed

The Data Subject has the right to be informed about the processing of their Personal Data, unless otherwise stipulated by law. Through this Regulation, WELCOME DTC ensures that the Data Subject is fully informed of all relevant details regarding the processing of the Data Subject's Personal Data by WELCOME DTC in accordance with legal requirements.

7.2. Right to Consent

After reading and fully understanding the contents of this Regulation, the Data Subject has the right to consent or not consent to WELCOME DTC processing their Personal Data, unless otherwise required by law. In case of consent, the Data Subject expresses their consent to this Regulation through any method as specified by WELCOME DTC from time to time and in accordance with applicable laws. The content of the consent and this Regulation shall form a legally binding agreement between the Data Subject and WELCOME DTC. By consenting to this Regulation, the Data Subject acknowledges that: At the time of giving their consent to this Regulation, the Data Subject has fully understood the contents:

- a. The type of Personal Data being processed;
- b. The purpose of processing the Personal Data;
- c. The organizations or individuals processing the Personal Data;
- d. The rights and obligations of the Data Subject. WELCOME DTC is not required to send any further notifications to the Data Subject when carrying out one or more processing activities on the Data Subject's Personal Data in the future. In any case, the consent of the Data Subject applies to all activities within the Personal Data processing procedures of WELCOME DTC.

7.3. Right to Access, Correct, Delete Personal Data, Restrict, and Object to Personal Data Processing

- a. The Data Subject has the right to request WELCOME DTC to grant access to view, correct, or delete their Personal Data, as well as to request WELCOME DTC to restrict or object to the processing of their Personal Data, unless otherwise required by law.
- b. WELCOME DTC has the right to refuse the Data Subject's request or request the Data Subject to provide additional information or grounds in certain cases, in accordance with legal requirements.
- c. If WELCOME DTC accepts the Data Subject's request, it will fulfill the request within a time frame consistent with legal requirements. The procedure for making and resolving the Data Subject's request will be carried out in accordance with WELCOME DTC's regulations from time to time.

7.4. Right to Withdraw Consent

- a. The Data Subject has the right to withdraw their consent, unless otherwise provided by law. The withdrawal of consent does not affect the legality of the processing of Personal Data that was carried out prior to the withdrawal of consent.

- b. WELCOME DTC has the right to refuse the Data Subject's request to withdraw consent in certain cases in accordance with legal requirements. The procedure for withdrawing consent will be carried out in accordance with WELCOME DTC's regulations from time to time.
- c. When the Data Subject withdraws consent, WELCOME DTC has the full right to cease providing products or services to the Data Subject and/or terminate the relationship between WELCOME DTC and the Data Subject, without being liable to the Data Subject, unless otherwise required by law.

7.5. Right to Lodge Complaints, Report, File Lawsuits, Claim Compensation for Damages, and Self-Protection

The Data Subject shall exercise their rights in accordance with the law. The Data Subject has the following obligations:

- a. Provide complete and accurate Personal Data to WELCOME DTC;
- b. Actively exercise the right to request correction of Personal Data when discovering inaccuracies;
- c. Take measures to protect their Personal Data, limit potential damages, and immediately contact WELCOME DTC upon discovering or suspecting unauthorized access, use, disclosure, loss, alteration, or acquisition of their Personal Data;
- d. Other obligations as prescribed by law.

8. RELATED PARTY

In cases where the Data Subject provides the Personal Data of another Data Subject to WELCOME DTC (“Related Party”), the Data Subject acts as the data controller/data controller and processor (depending on the agreement between the Data Subject and the Related Party), while WELCOME DTC acts as the data processor. This Regulation constitutes an agreement on the processing of the Related Party’s data between the Data Subject (the data controller/data controller and processor) and WELCOME DTC (the data processor). Accordingly, the Data Subject commits and ensures that WELCOME DTC has full rights to process the Personal Data of the Related Party as if it were the Data Subject’s own Personal Data. In this case, the Data Subject acknowledges and agrees that:

- 8.1. The Data Subject shall always fully fulfill the responsibilities of the data controller/data controller and processor with respect to the Related Party in accordance with the law;
- 8.2. Before providing the Personal Data of the Related Party to WELCOME DTC, the Data Subject has notified each Related Party about the processing of their Personal Data and obtained the consent of each Related Party for allowing the Data Subject to provide and

permit WELCOME DTC to process their Personal Data as if it were the Data Subject's own Personal Data, in accordance with the law and this Regulation, especially agreeing to the purposes of processing the Personal Data outlined in Section III of this Regulation. The Data Subject is obligated to provide WELCOME DTC with evidence proving that the Data Subject has notified each Related Party about the processing of their Personal Data and obtained each Related Party's consent at any time upon WELCOME DTC's request;

- 8.3. The Data Subject is obligated to notify the Related Party about this Regulation at each relevant time and is fully responsible if the Related Party makes any requests or complaints related to it;
- 8.4. In the event that the Related Party withdraws their consent for WELCOME DTC to process their Personal Data, the Data Subject must immediately notify WELCOME DTC within 24 hours from the time the Related Party withdraws consent, so that WELCOME DTC can cease processing the Related Party's Personal Data;
- 8.5. The Data Subject is fully responsible for the Personal Data of the Related Party and shall keep WELCOME DTC from suffering any adverse consequences from the processing of the Related Party's Personal Data. If the Data Subject violates any commitment in this Regulation and/or violates legal provisions resulting in damage to WELCOME DTC, the Data Subject commits to compensating WELCOME DTC for such damage in accordance with the law.

9. DISCLAIMER AND NON-GUARANTEE

- 9.1. WELCOME DTC acts as the data controller and processor, or as the data processor (depending on the case) under this Regulation and the applicable laws.
- 9.2. In order to effectively protect and ensure the safety and security of Personal Data, in addition to the measures and methods implemented by WELCOME DTC, the cooperation of the Data Subject is a necessary requirement. WELCOME DTC recommends that the Data Subject proactively take actions to protect and ensure the safety and security of their own Personal Data and that of the Related Party, in accordance with WELCOME DTC's requirements and/or the applicable laws. WELCOME DTC is not responsible if Personal Data is disclosed, lost, or interfered with unauthorizedly, unless caused by WELCOME DTC's fault.
- 9.3. WELCOME DTC does not guarantee the absolute accuracy of the Personal Data nor is it responsible for any loss or damage resulting from inaccurate Personal Data.
- 9.4. WELCOME DTC is exempt from any responsibility if force majeure events occur, causing interruptions, delays, or affecting WELCOME DTC's ability to process Personal Data.

10. GENERAL PROVISIONS

- 10.1. The Personal Data under this Regulation includes both the Personal Data of the Data Subject and the Related Party.
- 10.2. This Regulation has legal effect and is binding on the Data Subject and the Related Party. This Regulation is considered supplemental and does not affect any other rights regarding the collection, use, disclosure, and processing of data by WELCOME DTC. In the event that the Data Subject has agreed to allow WELCOME DTC to collect, process, provide, or disclose the Data Subject's information, including the information of the Related Party, prior to the publication of this Regulation by WELCOME DTC, the Data Subject's consent is automatically deemed to apply according to this Regulation without requiring further confirmation of consent from the Data Subject.
- 10.3. WELCOME DTC reserves the right to amend or supplement this Regulation at any time and publish the changes on the WELCOME DTC website at <https://welcomedtc.vn>. The Data Subject's continued use of WELCOME DTC's products and services and/or maintaining a relationship, interaction, or communication with WELCOME DTC shall be deemed as acceptance of the Regulation along with any modifications or supplements. The amended or supplemented Regulation will take effect for the Data Subject and the Related Party from the date specified by WELCOME DTC in the Regulation.

11. CONTACT INFORMATION FOR PERSONAL DATA PROTECTION

In case the Customer has any questions regarding the Terms and Conditions of Personal Data Protection or any issues related to the rights of the data subject or the processing of the Customer's personal data, please contact us using the following information:

a. **Welcome Debt Trading Co., Ltd**

3rd Floor, 194 Golden Building, 473 Dien Bien Phu Street, Ward 25, Binh Thanh District, Ho Chi Minh City.

b. **Email:** contact@welcomevina.vn

c. **Hotline:** 028 3622 6879