

PRIVACY NOTICE

FinOS Technology Vietnam Single-Member Limited Liability Company in Vietnam (“**FinOS**”, “**we**”, “**us**”, “**our**”), is part of the Allianz Group. We operate as a business-to-business financial technology platform provider, *inter-alia*, providing financial operating system platform (“**Technology Services**”) for use by financial institutions and other ecosystem players (our “**Customers**”). Protecting privacy is a top priority for us. This privacy notice explains how FinOS collects, uses and discloses personal data.

BY ACCESSING AND/OR USING ANY PLATFORM, WEBSITE OR APPLICATION OPERATED OR POWERED BY US, INCLUDING WITHOUT LIMITATION THE WEB APPLICATIONS (AS DEFINED BELOW), YOU ACKNOWLEDGE THAT YOU HAVE BEEN NOTIFIED OF AND UNDERSTOOD THIS PRIVACY NOTICE AND YOU ACCEPT ALL OF ITS TERMS. IN PARTICULAR, YOU AGREE AND CONSENT TO US COLLECTING, USING, DISCLOSING, STORING, TRANSFERRING, OR OTHERWISE PROCESSING YOUR PERSONAL DATA IN ACCORDANCE WITH THIS PRIVACY NOTICE.

For the avoidance of doubt, nothing in this privacy notice shall be interpreted to prejudice FinOS’ rights to collection, use, processing and disclosure of personal data without permission of the data subject as contemplated by the applicable laws.

1. What data will be collected, used and/or disclosed by us?

We may collect, use and/or disclose:

- (a) The following categories of personal data of individuals who use and/or access platforms, websites or applications operated or powered by us:
 - Surname, first name
 - Address
 - Date of birth
 - Gender
 - Identification document number
 - Nationality
 - Telephone number
 - Email address
 - Residential address
 - Employment information
 - Financial information
 - Marital status
 - Photograph
- (b) Information which the web server automatically records on our website - <https://finos.asia> and/ or Customers’ mobile applications powered by us (collectively “**Web Applications**”), as the case may be. This includes:
 - IP address of the device used to access Web Applications (“**Device**”)

- Device's browser software
- Pages visited on the Web Applications, including the date and duration of visit
- Device platform
- Device type
- Device family
- Device location
- Device version
- Device network carrier
- Device OS
- Device language
- Device library
- Device applications
- Device screen and battery behaviour
- Device calendar (hashed personal data)
- Other devices connected to the Device
- Device contacts (hashed personal data)
- Device metadata of files
- Device hardware details
- Device network and sensor metadata

Use of Cookies and other device Identifiers

FinOS uses tracking technology such as cookies, tags, mobile identifiers (associated with application usage such as IDFAs for iOS and Android Ad IDs for Android) or other Device IDs associated with devices connected to the internet ("**Device Identifiers**") to gather information as outlined in Section 1(b) above to understand the use of the Web Applications.

Tracking technology helps us manage and improve the usability of the Web Applications, for example by detecting whether there had been any contact between your computer or mobile device(s) and us in the past and to identify the most popular sections of the Web Applications.

When you save your privacy settings in the Web Applications, they should also apply to your future visits to the Web Applications. However, for technical reasons beyond FinOS' control, this cannot be guaranteed. For example, if you reset your browser, delete your cookies, reset your advertising Device Identifiers or access the Web Applications from another browser or device your privacy settings may be lost.

In many cases, you can also control tracking technologies using your browser or mobile device. Please ensure that your browser and/or mobile device setting reflects whether you wish to be warned about and/or accept tracking technologies where possible. The

specific privacy settings of your browser and/or mobile device and instructions on how to adjust these privacy settings can usually be found in the manual or help file of your browser and/or mobile device.

Refusing, disabling or deactivating of tracking technologies may result in a reduced availability of the services provided by the Web Applications or parts of the Web Applications may no longer function correctly.

Use of Third Party Analytics tool

The Web Applications may use web and app analytics services provided by third party service providers ("**Third Party Analytics Tool**"), to help the Web Applications to analyse how users use the Web Applications.

The Third Party Analytics Tool will use this information on behalf of the operator of the Web Applications for the purpose of evaluating users' use of the Web Applications, compiling reports on usage activity and providing such operator with other services relating to usage activity and internet usage. You may in certain cases disapply the operation of the Third Party Analytics Tool, by selecting the appropriate settings on your browser and/or mobile device, however please note that if you do this you may not be able to use the full functionality of the Web Applications.

Please note that our Customers' mobile applications, which are powered by us, may be subject to Customers' data protection and privacy practices, which are different from ours. We are not responsible for privacy practices of our Customers and/or the Third Party Analytics Tool suppliers and encourage you to review their privacy notices to understand their information handling practices.

(c) Information we receive from third party sources:

- device identifiers;
- hashed email addresses;
- demographic information like age, gender, city/region;
- mobile app usage data about apps installed/accessed on a user's device and app events and browsing data such as browsing URLs; and
- geolocation data.

(d) Lastly, we may collect personal data which you provide through the FinOS website, for example when you enter personal details (e.g. name, phone number, e-mail address, company name) on the 'Contact us' page.

2. How will we use the data?

FinOS will use data collected pursuant to this privacy notice for the following purposes as well as for such other purposes in any case subject to compliance with applicable laws:

- performing obligations in the course of or in connection with our provision of the goods and/or services to our Customers, which may include merging the Device Identifiers with information we receive from third party sources;
- responding to, handling, and processing queries, requests, applications, complaints, and feedback relating to our data processing;

- complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- marketing and other advertising purposes (including without limitation for distribution of advertisements, product introduction and other commercial information), business development, and research and development purposes;
- transmitting to our affiliates, unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether within the country or overseas, for the aforementioned purposes; and
- any other purposes for which we have been provided the information;
- any other incidental business purposes related to or in connection with the above.

Without prejudice to the generality of any other term in this privacy notice, you may choose to discontinue the use of your personal data by FinOS for the following purposes by delivering a notice to us via the communication means prescribed in Section 8 of this privacy notice expressly specifying such request and such a notice shall only take effect within 3 working days since the date of actual receipt by FinOS:

- marketing and other advertising purposes; and
- disclosing and/or transmitting to our affiliates, unaffiliated third parties.

You acknowledge and agree that the discontinuation of such use purposes may result in a reduced availability of the services provided by FinOS.

3. Disclosure of data

We may disclose personal data:

- where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services to our Customers; or
- on a “need to know” basis to our affiliates, agents, representatives, third party service providers, and other organisations we have engaged to perform any of the functions with reference to the purposes mentioned in Section 2 of this privacy notice;
- in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in any insolvency or similar proceedings); and/or
- to meet any legal obligation, including to, if applicable, any regulatory authority.

4. What are your rights in respect of your personal data?

You have the right to:

- access your personal data we hold about you and to learn the origin of the data, the purposes and ends of the processing, the details of the data controller(s), the data processor(s) and the parties to whom the data may be disclosed;
- withdraw your consent at any time where your personal data is collected, used or disclosed with your consent;

- update or correct your personal data so that it is always accurate;
- request us to delete your personal data from our records if it is no longer needed by us for the purposes indicated above;
- restrict the use and disclosure of your personal data in certain circumstances, for example where you have contested the accuracy of your personal data, for the period enabling us to verify its accuracy;
- file a complaint with us and/or the relevant data protection authority; and
- exercise any other rights, with respect to your personal data, available to you under applicable laws.

You may exercise these rights by contacting us as detailed in Section 8 below by providing to us your name, email address, account identification, and purpose of your request.

5. How can you withdraw consent to the collection, use and disclosure of your personal data?

Where permitted by applicable law or regulation, you have the right to withdraw consent to the collection, use and disclosure of your personal data. Once you have informed us of this request, we shall no longer collect, use and disclose such personal data (as the case may be) unless permitted by applicable laws and regulations.

You may exercise these rights by contacting us as detailed in Section 8 below by providing to us your name, email address, account identification, and your specific request.

6. What security measures have we implemented to protect your information collected under the terms of this privacy notice?

FinOS has implemented reasonable technical and organizational security measures to protect your personal data collected in accordance with the terms of this privacy notice against unauthorized access, misuse, loss or destruction. Notwithstanding, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, you acknowledge that we cannot guarantee the integrity and accuracy of any personal data which you transmit over the internet, nor guarantee that such personal data would not be intercepted, accessed, disclosed, altered or destroyed by unauthorised third parties, due to factors beyond our control.

7. How long do we keep the data?

We retain personal data as long as necessary for the purpose for which it was obtained and in accordance with applicable laws. However, we may continue to hold the personal data for a longer period for business and legal reasons, including enforcement of our contractual and legal rights.

8. How can you contact us?

If you have any queries about how we collect, use and process your personal data or wish to exercise any rights you may have under this privacy notice or applicable laws, you can contact us by email at DPO@finos.asia.

9. Language

If there is any difference or conflict between the English and Vietnamese versions of this privacy notice, the English version shall take precedence over the Vietnamese version.

10. How often do we update this privacy notice?

We regularly review this privacy notice. We will ensure the most recent version is available on our website <https://finos.asia>. You agree to review this privacy notice periodically, and your continued use of any of the platforms, websites and applications including without limitation the Web Applications shall be deemed as conclusive and full acceptance of prevailing privacy notice.

This privacy notice was last updated on 20 February 2020.