



## PRIVACY NOTICE

United Overseas Bank (Vietnam) Limited and its related corporations (collectively “UOB”, “we” or “us”) value your privacy and strive to protect your personal data in compliance with the laws of Vietnam.

We will only collect and use your personal data in accordance with such laws (including Decree No. 13/2023/ND-CP dated 17 April 2023 on personal data protection (as amended or replaced from time to time), this Privacy Notice and the privacy terms in your agreement(s) with us.

This Privacy Notice forms a part of the terms and conditions governing your relationship with us (including the Terms and Conditions Governing Accounts and Services) (collectively “**Terms and Conditions**”) and should be read in conjunction with those Terms and Conditions. By applying for or using our products or services or by giving us access to your personal data, you accept the policy and practice described in this Privacy Notice.

This Privacy Notice explains:

- What kind of personal data we collect and how we collect it;
- How we process your personal data;
- The parties that we disclose the personal data to;
- Your rights and obligations in relation to the personal data we collect; and
- The choices we offer, including how to access and update your personal data.

By providing personal data relating to a third party (e.g., information of your dependent, spouse, children and/or parents, friends, beneficiaries, attorneys, partners, emergency contacts, or other individuals) to us, you represent and warrant that the consent of that third party has been obtained for the processing (including but not limited to collection, use and disclosure) of the personal data for the purposes listed herein. Where you are a corporate entity or organisation, to the extent that you have provided or will provide personal data about your directors, shareholders, employees, authorised representatives, agents and/or other individuals, you confirm that you have explained or will explain to them that their personal data will be provided to, and processed by, us and you represent and warrant that you have obtained their consent to the processing (including disclosure and transfer) of their personal data in accordance with this Privacy Notice.

We act as a personal data controller and processor for the personal data we collect from you or during the course of our dealings with you. This means that we determine the purposes for and the manner in which such personal data is processed and when acting as the personal data processor, we directly process such personal data.

### **1. What kind of personal data we collect and how we collect it**

1.1 In order to enable us to deal with your inquiries, open and operate an account/facility for you and/or to generally provide you with our products and services, we, and the data processor that we engage, may need to and/or may be required to collect, record, analyse, confirm, store, alter, use, disclose, combine, access, trace, retrieve, encrypt, decrypt, copy, share, transmit, provide, transfer, delete, destruct or conduct any other relevant activities on (i.e., “process”) personal data, which includes any data which relates directly or indirectly to you and/or your transactions with us. We, and the data processor that we engage, may process the following types of personal data collected about you, your employees, agents and contractors and those of a related entity or third party (as is appropriate from time to time):

- (a) Family name, middle name and first name as stated in the birth certificate, and other names (if any);
- (b) Date of birth; date of death or date gone missing;
- (c) Gender;
- (d) Place of birth, place of birth registration, place of permanent residence, place of temporary residence, place of current residence, hometown, contact address;
- (e) Nationality;
- (f) Personal photos; information captured on security systems (including a recording of your

image on Closed Circuit Television (CCTV));

- (g) Phone number, people's identity card number, personal identification number, passport number, driver's license number, license plate number, personal tax identification number, social insurance number, health insurance card number;
- (h) Marital status;
- (i) Information on family relationships (parents, children);
- (j) Information on personal digital accounts; personal data that reflects activities or history of activities in cyberspace;
- (k) Details of access to our websites and applications, including but not limited to, location data, traffic data and other communication data (such as IP address), and the resources that are accessed;
- (l) Data created as a result of the operation of a card or a card account, data on how customer manage and use a card, customer behaviors, actions, or interests demonstrated across digital platforms;
- (m) Political and religious views;
- (n) Information relating to racial origin and ethnic origin;
- (o) Information on health condition and private life that is documented in medical records, excluding information on blood type;
- (p) Information relating on inherited or acquired genetic characteristics;
- (q) Information on distinctive physical attributes and and biological characteristics;
- (r) Data about crimes and criminal acts that are obtained and kept by law enforcement agencies;
- (s) Personal location data that are identified through positioning services;
- (t) Transaction information and information contained in any of your account(s) you may have with us either singly or jointly with any other person, the type of products and/or services that you have subscribed to with us and such other necessary data regarding yourself and your transaction(s) with us, including but not limited to customer identification information (which could include signature, fingerprint, facial image and other biometrics), information on accounts, information on deposits, information on deposited properties; and/or
- (u) Other data that is relevant to the provision of our goods and services.

1.2 We, and the data processor that we engage, may obtain these data from yourself when you apply for, or during the course of our provision to you of, any of our products and services, and from a variety of sources, including but not limited to:

- (i) through your relationship with us, for example information provided by you in application forms or supporting documents, when using our products or services, when taking part in customer surveys, competitions and promotions, and during financial reviews;
- (ii) through your verbal and written communications with us and/or our authorised agents;
- (iii) from our suppliers, service providers, partners, merchants and third parties, including but not limited to survey, social media, marketing, credit reference, fraud prevention, data aggregating agencies, infrastructure and facilities support providers, and other third parties in connection with our business;
- (iv) from third parties connected with you, such as employers, joint account holders, guarantors, security providers, co-partners, co-directors and co-shareholders;
- (v) from any credit reporting agencies, credit reference agencies and governmental agencies, or information obtained from any publicly available sources, directories, or registries;
- (vi) from the State Bank of Vietnam or other competent authorities in Vietnam or overseas;
- (vii) through recorded footage from the CCTV at our premises;

- (viii) from an analysis of the way you use and manage your account(s)/facility(ies) with us, from the transactions you make and from the payments made to/from your account(s)/facility(ies);
- (ix) via cookies or other similar tracking devices/tools; and/or
- (x) from third party source, where you have consented to the collection, or where collection is required or permitted by law.

1.3 We and persons acting on our behalf may record and/or monitor communications (including telephone, conversations over landlines and mobile phones, emails, instant messaging, chat rooms, fax and other electronic communications) between you, your authorised representatives, employees, agents and contractors and those of entities associated with you (as the case may be) and our employees, agents, consultants, contractors or other personnel and non-UOB individuals (such as employees of our clients). We only do this to the extent permitted by applicable law for legitimate purposes or other purposes permitted or required by law. We collect this type of personal data for several reasons including but not limited to: (a) record purposes; (b) complying with applicable law and regulations; (c) complying with internal procedures and policies; (d) facilitating administration and support; (e) assisting with security, crime prevention and anti-fraud purposes; and (f) investigating or detecting unauthorised use, wrongful use or abuse of our services, systems or other materials.

## **2. How we process your personal data**

2.1 We, and the data processor that we engage, may process your personal data for one or more of the following purposes:

- a) for identity and background establishment; authentication and screening;
- b) to conduct checks with the do not call or other registry (if any);
- c) to assess and process your application(s)/request(s) for any of the products or services offered or distributed by us (including but not limited to third party products such as insurance policies);
- d) to verify your financial standing through credit reference checks;
- e) to underwrite, establish and evaluate your creditworthiness;
- f) to enable us to consider whether to provide or continue to provide to you any of our products and services;
- g) to manage and maintain your account(s) and facility(ies) with us;
- h) to provide/send statements, mail, letters or other communications to you or to related parties, and update your personal information;
- i) to do data entry, to check the completeness and accuracy of customer data inputted into the system;
- j) to better manage our business and your relationship with us (including to the training provided to our staff);
- k) to authenticate you so that, among others, you can access digital/electronic accounts, to personalize your experience with our products and services; to monitor your access and membership with related third parties;
- l) to auto-enroll you on digital apps in order to manage your card and card account, including but not limited to our mobile application, digital credit card statements, biometric authentication and biometric fraud detection solutions;
- m) to monitor and record calls and electronic communications with you and other related third parties;
- n) to undertake and comply with contractual arrangements between us and other parties;
- o) for reward redemption fulfillment, gift delivery, mile transfer redemption,
- p) to perform card/account/transaction suspension, blockage or closure;
- q) to better understand your current and future investment needs and your financial situation;

- r) to improve, enhance, personalize, and tailor our products and services including online services, and to develop new products and services;
  - s) to administer offers, competitions, campaigns and promotions;
  - t) to respond to your enquiries and complaints and to generally resolve disputes;
  - u) to produce data, reports and statistics, responses, for ourselves or for our related third parties or upon requests from the State Bank of Vietnam, other competent authorities, or related third parties;
  - v) to conduct market research, surveys and data analysis relating to any service or product provided by us (whether conducted by UOB or jointly with another party) which may be relevant to you;
  - w) for risk assessment, statistical, trend analysis and planning purposes, including to carry out data processing statistical, credit, risk and anti-money laundering analyses, to create and maintain credit scoring models, and review and maintain credit history of individuals;
  - x) to provide information on, offer and conduct marketing and promotion, to you of any products, services, offers or events provided by UOB and UOB's business partners which we think may be of interest to you;
  - y) for audit, compliance and risk management purposes;
  - z) to meet or comply with UOB's internal policies and procedures and any applicable rules, laws, regulations, codes of practice or guidelines, orders or requests issued by any court, legal or regulatory bodies (both national and international) (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
  - aa) to assess any proposed acquisition, implement any acquisition or transfer of business and/or assets, transfer or assign our rights, interests or obligations under your agreement(s) with us;
  - bb) to protect or enforce our rights, including to collect fees and charges and to recover any debt owing to us;
  - cc) to maintain accurate KYC information, detect, prevent, and investigate crime, offences, or breaches and conduct anti-money laundering, credit and background checks or other checks as required;
  - dd) for our suppliers/service providers/vendors;
  - ee) for any other purpose that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities; and/or
  - ff) to undertake other activities in connection with our provision, operation, processing, and administration of products and services to you, and to serve other purposes that we deem appropriate from time to time.
- 2.2 CCTV footage, in particular, may also be used for the following purposes: (i) for quality assurance purposes; (ii) for public safety and the safety of our employees; (iii) detecting and deterring suspicious, inappropriate or unauthorised use of our facilities, products, services and/or premises; (iv) detecting and deterring criminal behavior; and/or (v) conducting incident investigations.
- 2.3 A cookie is a small text file that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to collect information about users of our website (for example, store users' preferences and record session information) and the information that we collect is then used to ensure a more personalised service level for our users. You can adjust settings on your browser so that you will be notified when you receive a cookie. Should you wish to disable the cookies associated with these technologies, you may do so by changing the settings on your browser. However, by doing so, you may not be able to use certain functions or enter certain part(s) of our websites.
- 2.4 We will ask for your consent before using your personal data for a purpose other than those that are set out in this Privacy Notice and in the privacy terms in your agreement(s) with one or more members of the UOB Group.
- 3. Disclosure of your personal data**

3.1 In order to provide you with our products and services and to manage and/or operate the same, and/or to serve other purposes as described above, we may disclose your personal data or personal data of third parties related to you, to the following parties:

- (a) companies and/or organisations within UOB Group;
- (b) companies and/or organisations that act as our vendors, suppliers, partners, agents and/or professional advisers, including but not limited to companies providing administrative, mailing, telemarketing, direct sales, call centre, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference and other background checks, custodian, depository, plastic card, clerical, market research, data modelling, reward redemption, record storage and management, data entry, pre-screening and verification, legal, network website or social media, telecommunication, SMS delivery or email delivery, network connection, telephone, infrastructure facilities and technology support, workforce management, risk reporting, credit decision, information security, software maintenance and licence, data center, voice and conferencing, and advisory services, and/or other services in connection with, or support to, the operation of our business;
- (c) your advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) where authorised by you;
- (d) any person notified by you as authorised to give instructions or to use the account(s)/facility(ies) or products or services on your behalf, including your joint account holders;
- (e) any actual or proposed assignee or other third party as a result of any restructuring of facilities granted to you or the sale of debts, or the acquisition or sale of any company or assets by us;
- (f) the police or any public officer conducting an investigation in connection with any offence including suspected offences;
- (g) any guarantors or security providers for the facility(ies) granted by us to you;
- (h) any rating agency, insurer or insurance broker or direct or indirect provider of credit protection;
- (i) any court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over us;
- (j) the Credit Information Center of Vietnam or any other authority or body established by the State Bank of Vietnam or any other authority having jurisdiction over us;
- (k) any credit reporting agencies or credit reference agencies;
- (l) any credit institutions, foreign bank agencies and branches, financial institutions, merchants, VISA International Services Association, MasterCard International Incorporated, other card associations in relation to any products and services provided to you by us;
- (m) any person, authorities or regulators or third parties to whom we are permitted or required to disclose under the laws of any country, or under any contractual or other commitment between third party and us;
- (n) any person intending to settle any moneys outstanding under any of your account(s) with us; and/or
- (o) any person in connection with the enforcement or preservation of any of our rights under your agreement(s) with us or otherwise,

subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to us (whether in or outside Vietnam), for any of the purposes set out above.

3.2 Additionally, the individual entities within the UOB Group, our merchants and strategic partners may contact you about products, services and offers, which we believe may be of interest to you or benefit you financially.

3.3 We will otherwise treat your personal data as private and confidential and apart from the parties

stated above, we will not disclose your data to any other party except:

- i. where you have given permission;
- ii. where we are required or permitted to do so by law;
- iii. where required or authorised by any order of court;
- iv. where we may transfer rights and obligations under your agreement(s) with us; and/or
- v. where we are required to meet our obligations to any relevant regulatory authority.

#### **4. Security of your personal data**

- 4.1 The processing of personal data may pose the risk of data leakage or inappropriate handling of data. Understanding the importance of personal data protection, we treat information as our valuable asset and therefore we place great importance on ensuring the security of your personal data. We regularly review and update our technical and organisational security measures when processing your personal data.
- 4.2 Our employees are trained to handle personal data securely and with utmost respect, failing which they may be subject to disciplinary action.

#### **5. Your rights and obligations in relation to the personal data we collect**

- 5.1 We can assist you to access and correct your personal data held by us.
- 5.2 Where you wish to have access to your personal data in our possession, or where you are of the opinion that such personal data held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request to us via our Central Plaza (Le Duan) Branch and HCMC Copac Branch or via other channel(s) that we may make available from time to time.
- 5.3 We will use reasonable efforts to comply with your request to access or correct your personal data within 72 hours of receiving your duly completed and proper request and the relevant processing fee (if any), subject to our right to rely on any statutory exemptions and/or exceptions.
- 5.4 Please note that we may have to withhold access to your personal data in certain situations, for example when we are unable to confirm your identity or where the data requested for is of a confidential commercial nature or in the event that we receive repeated requests for the same data.
- 5.5 Nevertheless, we will notify you of the reasons for not being able to accede to your request.
- 5.6 Please also note that we may exercise our discretion in allowing the corrections requested and/or may require further documentary evidence of the new data to avoid fraud and inaccuracy.
- 5.7 You can also assist us to keep your personal data (such as your current contact number and mailing address) up to date, as it will enable us to serve you better.
- 5.8 You may withdraw your consent given for any or all purposes set out in this Notice in writing by using the prescribed form which is available at our branches. If you withdraw your consent to any or all purposes and depending on the nature of your request, we may not be in a position to continue providing our products or services to you. Your withdrawal may be considered a termination by you of any contractual relationship which you may have with us, and a breach of your contractual obligations or undertakings, and our legal rights and remedies in such event are expressly reserved.
- 5.9 Without prejudice to the foregoing, you agree and acknowledge that any withdrawal of your consents in accordance with the terms set out in this Privacy Notice will not affect any consent which you may have provided to UOB in respect of the use of your Vietnam telephone number(s), your emails, and other personal data, for the receiving of marketing or promotional information. You may nevertheless specifically withdraw your consent to receiving such marketing communications at any time.
- 5.10 This Privacy Notice does not derogate from the Terms and Conditions. Our rights under this Privacy Notice shall be additional and without prejudice to other rights of collection, use, disclosure, and other personal data processing activities available pursuant to the Terms and Conditions or under applicable laws and regulations and nothing herein is to be construed as limiting any of these other rights.

**6. Retention of your personal data**

We will retain your personal data for such period or duration as required by your relationship with us, in compliance with this Privacy Notice and/or the terms and conditions of your agreement(s) with us, for such other period as may be necessary to serve the interests of UOB Group and/or its customers, or where otherwise required by the law and/or by UOB Group's relevant policies, or for such other period where the purposes for which your personal data was collected remain valid.

**7. What if personal data provided by you is incomplete**

As UOB relies on your personal data to provide products and services to you, you shall ensure that at all times the information provided by you to us is correct, accurate and complete. You shall update us in a timely manner of all changes to the information provided to us.

Should you withhold your consent for us to collect, use and disclose your personal data in accordance with this Privacy Notice, the withdrawal thereof may render our service limited, restricted, suspended, cancelled, prevented, or prohibited, as the case may be. We will not be liable to you for any losses incurred, and our legal rights are expressly reserved in respect of such limitation, restriction, suspension, cancellation, prevention, or prohibition.

**8. Revisions to the Privacy Notice**

This Privacy Notice may be revised from time to time. Notice of any such revision will be given on our website and/or by such other means of communication deemed suitable by us.

**9. Contacting us about your privacy and how we handle your personal data**

Should you have any query in relation to this Privacy Notice or how we handle your personal data, kindly speak to any Customer Service Officer at any of our branches or contact us at:

(i) Hotlines:

- Personal Customer Service Hotline: 1800 599 921 (Local) | +84 28 3898 9999 (Overseas)
- Business Banking Hotline: +84 28 3868 9700 (Local & Overseas)
- Commercial Banking Hotline: 1800 558 880 (Local) | +84 28 3933 1999 (Overseas)

(ii) Mailing address:

Basement, Ground Floor, Central Plaza Building  
17 Le Duan Boulevard, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam