

No.:

Ho Chi Minh City, date 18 month 06 year 2026

PRIVACY POLICY

Article 1. Applicable subjects and purposes of this document

The University of Sydney Vietnam Institute Company Limited (hereafter referred to as "**USVI**" or "**we**" or "**us**"), issues and applies this Privacy Policy (hereafter referred to as "**Policy**") for individuals and organizations with whom we interact, including clients, client personnel, USVI personnel (including collaborators, contractors who work as employees, interns, outsourced workers, and other staff), relevant third parties, suppliers, and individuals who access our website (hereafter referred to as "**you**").

This Policy outlines how we handle digital data or information in other forms provided by you that identifies or helps identify a specific person, including basic personal data and sensitive personal data ("**Personal Data**"). For the avoidance of doubt, Personal Data, once de-identified, shall no longer be regarded as Personal Data.

This Policy applies to any relationship (present or potential) established between you and us and the way we interact with your Personal Data, including collecting, analyzing, certifying, aggregating, encrypting, decoding, modifying, deleting, destroying, de-identifying, providing, publicizing and transferring personal data or other relevant activities that affect Personal Data (hereafter referred to as "**Process**", "**Processing**", or "**Processed**") which is always in accordance with applicable laws, regulations, data protection norms, and privacy rights standards. For certain special arrangements, such as your intended participation in our confidential research projects with higher privacy protection standards, we will have separate communications to address those arrangements and you should consider them separately.

This Policy can be amended or updated from time to time to reflect changes in our Personal Data processing practices or changes in legislation.

Article 2. Personal Data processing principles

In the context of this Policy, as Personal Data controller cum processor, we will:

- a. Process your Personal Data in both paper or electronic formats deemed appropriate by USVI and its authorized third parties for the purposes provided for in Article 4 hereinafter in accordance with the Vietnamese laws;
- b. Inform you of the Processing, unless otherwise stipulated by laws;
- c. Process your Personal Data solely for the purposes specified in Article 4 below;
- d. Collect your Personal Data only to the extent necessary to achieve the purposes specified in Article 4 below;
- e. Update or rectify your Personal Data as necessary to align with the Processing purposes;
- f. Secure and keep your Personal Data confidential using appropriate measures;
- g. Retain your Personal Data only until the processing purposes are fulfilled, unless a longer retention period is required by law.

You are requested to assist us in adhering to the above principles.

Article 3. Types of Personal Data being processed

This Policy applies to Personal Data provided by you or your authorized relevant third party and covers both basic Personal Data and sensitive Personal Data, including:



3.2. Basic Personal Data

“*Basic Personal Data*” means Personal Data that reflects common and identifiable personal elements, frequently used in transactions and social relations, as prescribed in the list issued by the Government. Basic Personal Data includes without limitation to the followings:

- a. Identification information such as full name, date of birth, gender, nationality, ID card number/PI number or passport number, date of issue, place of issue, photo of ID card or passport, tax code, social insurance number, and health insurance number;
- b. Marital status and information about the individual’s family relationship (parents, children, spouses);
- c. Other information affiliated to a specific person or helping identify a specific person which is not classified as Sensitive Personal Data.

3.3. Sensitive Personal Data

“*Sensitive Personal Data*” means personal data associated with the privacy of an individual that, once infringed upon, will directly affect lawful rights and interests of agencies, organizations or individual, as prescribed in the list issued by the Government. Sensitive Personal Data includes without limitation to the followings:

- a. Health condition and personal information stated in health record (including your current health information and your health information recorded by us);
- b. Information about race or ethnic origin;
- c. Information about an individual’s own biometric or biological characteristics such as information on blood group;
- d. Information about an individual’s sex life, sexuality, or sexual orientation;
- e. Others personal data that are required by law to keep confidential or to which strict confidentiality measures must be applied.

These kinds of Personal Data are Processed either manually on paper and/or electronically, using methods that we and our authorized third parties consider to be compatible with the purposes outlined below.

Article 4. Purposes and methods of processing

4.1. Purposes of processing:

For USVI’s employees:

- a. For executing and implementing labor contract and other related contracts, including amendments thereof;
- b. For our internal labor management purposes. Examples of these purposes include, but are not limited to: management of recruitment, promotion, training or career development; contacting next of kin in event of emergency; pensions and benefits administration; work planning and management; provision of references to employers, financial or educational institutions, partners; conducting of performance development reviews, appraisals, etc., preparing management reports or employee announcements, monitoring compliance and conducting investigations related to compliance with USVI’s policies or applicable laws; reporting compliance; monitoring the employee’s use of USVI’s electronic communications systems and evidencing disciplinary actions.

For USVI’s operations:

- a. To identify or authenticate a person(s);
- b. For science research activities under research projects of USVI;
- c. For compliance with legal obligations of USVI such as the Labor Code, Social Insurance Law, or

State authorities' requests, etc.;

- d. For compliance with rules, or regulations, or work regulations of USVI or USVI's affiliates, including cooperation with internal investigation for establishment, or compliance, or exercise of legal claims on behalf of USVI.

4.2. Methods of processing:

a. Research:

- i. Obtaining: collecting personal data from various sources (case report forms, website, research databases).
- ii. Recording: Inputting collected data into research databases.
- iii. Analysis: Processing data to extract insights and information.
- iv. Storage and access
 - Store physical data, primary materials and research records in the locked offices with limited access. Locked cupboards or rooms are used to store research records which have potentially identifiable information.
 - Collect and store digital research data on data collection and management platforms and USVI Highly Protected Share Point which has varying levels of restricted access and 2-factor authentication.
- v. Encryption, decryption: Data is transferred to secure data collection platforms and Highly Protected SharePoint. Upon download, all personally identifiable information is removed. Any residual identifying information will be protected by strong encryption.

b. Operation:

i. Human Resources and Administration

- The recruitment platform collects information of the candidates and automatically send CVs of candidates to email of HR Manager. CVs of candidates consist of candidate's personal data. HR Manager screens and stores CVs of potential candidates to USVI Highly Protected SharePoint and shares with relevant departments for further recruitment activities.
- We outsource a Business Service Provider to look after onboarding process for new employees. This Business Service Provider collects personal data of new employees for preparing job offer letter, labour contract, social security and personal income tax registrations. It stores personal information and soft copies of employees' onboarding documents in their SharePoint and shares with HR Manager for access and further use. HR Manager only stores hard copies of employees' labour contracts in our office as well as soft copies of employees' labour contract in USVI Highly Protected SharePoint. After employees' probation, HR Manager keeps storing employment documents of employees in USVI Highly Protected SharePoint.

ii. Finance and Accounting

- Obtaining: collecting personal data from various source, primarily provided by individuals themselves.
- Recording: Inputting collected data into systems (Financial system, Excel file).
- Storage and access: Store physical data, primary materials and finance and accounting records in the locked offices with limited access. Electronic or soft copy documents containing personal data must be password-protected.

iii. Communications

- Obtaining: collecting personal data from various sources (website, primarily provided by individuals themselves).
- Recording: Inputting collected data into systems (Excel file, Sharepoint).
- Storage and access: The data is securely stored and managed to ensure confidentiality and is only used for the specified purposes to improve services and understand stakeholder needs.

Article 5. Retention and disclosure of Personal Data

5.1. Retention of Personal Data

We implement suitable measures to ensure that your Personal Data is Processed only for the duration necessary to fulfill the purposes outlined herein or as required by laws, whichever duration is longer.

We start to process Personal Data upon your consent and provision of such Personal Data, and we delete Personal Data under the following circumstances:

- a. The purpose of processing Personal Data, as consented by you, is fulfilled or when storing Personal Data is no longer necessary to our operation, except where required by law or requested by competent authorities;
- b. USVI ceases to exist or operate, declares bankruptcy, or terminates its activities according to the provisions of law. In some circumstances we may anonymize your Personal Data irreversibly (so that it can no longer be associated with you) for statistical purposes, in which case we may use this information indefinitely without further notice to you.

5.2. Disclosure of Personal Data

Your Personal Data shall not be shared with any external third parties beyond USVI, except with authorized service providers essential for processing this data to fulfill purposes or with other third parties as permitted or required by applicable laws and regulations. Specially, we may share Personal Data under our control or being processed with the following parties:

- a. Our personnel: your Personal Data can be shared to personnel who are designated to perform tasks relating to the Processing of Personal Data;
- b. Third parties providing services and/or co-researching: your Personal Data can be shared to authorised service providers engaged to support USVI's operations and activities and to research collaborators and affiliated institutions working with USVI, including
- c. The University of Sydney and its authorised staff, such disclosure may include the sharing, access, processing, storage or other activities of Processing of Personal Data on systems and platforms operated or managed by the University of Sydney from time to time, including Highly Protected SharePoint and similar platforms used for research collaboration, data management, or administrative purposes;
- d. Competent authorities: your Personal Data can be shared to competent authorities or other competent agencies to comply with provisions of applicable law from time to time, including foreign legislation; and
- e. Other parties that you agree: your Personal Data can be shared with other parties with your consent.

If transferring Personal Data abroad, we will take reasonable measures to ensure that such Personal Data continues to enjoy a comparable standard of protection as required under applicable laws (e.g., by imposing appropriate contractual obligations on the recipient of such Personal Data).

Article 6. Security

We adopt appropriate and necessary organizational, technical and administrative measures to safeguard the Personal Data under our control and Processing. While we strive to ensure the utmost protection during data transfer and delivery, you should understand that we cannot guarantee 100% security against cyber incidents or data breaches. In case incident occurs, we will handle incidents most efficiently to mitigate damages and fulfill our obligations according to the applicable law. Third-party Personal Data collection may not have the same level of protection as the Personal Data provided by us, and we cannot guarantee the confidentiality of such data.

Article 7. Your rights and obligations

7.1. Your rights

Unless otherwise provided by laws, you have the rights relating to your Personal Data processing, including but not limited to:

- a. Right to know: You have the right to know your Personal Data processing;
- b. Right to consent: You have the right to consent or decline our processing of your Personal Data;
- c. Right to access: You have the right to access, view, modify, correct or update your Personal Data;
- d. Right to request re-examination, modification, correction and update: You have the right to request us to re-examine, modify, correct or update your Personal Data under our control or processing;
- e. Right to revoke consent: You have the right to revoke your consent;
- f. Right to deletion of Personal Data: You have the right to delete or request us to delete your Personal Data that we are controlling or processing;
- g. Right to restriction: You have the right to obtain restriction on the processing of your Personal Data;
- h. Right to obtain Personal Data: You have the right to request us to provide you with your Personal Data that we are controlling or processing;
- i. Right to objection: You have the right to object to your Personal Data processing to prevent or limit the disclosure of Personal Data or using it for promotion purpose;
- j. Right to filing complaint, denunciations and lawsuits: You have the right to filing complaint, denunciations, lawsuit according to the law;
- k. Right to request for compensation for damage in accordance with law: You have the right to request compensation for damage in case of a data breach in accordance with law; and
- l. Other rights according to applicable laws from time to time.

7.2. Your obligations

When you provide us with Personal Data for Processing as per this Policy, you shall be subject to the following obligations, including but not limited to:

- a. Self-protection of your Personal Data, request other relevant organizations, individuals to protect your Personal Data;
- b. Respect for and protect Personal Data of others;
- c. Fully and accurately provide Personal Data upon consent to processing of Personal Data, ensure the accuracy of the provided Personal Data and promptly notify us about any changes to your provided Personal Data;
- d. Comply with all requirements applied to your provision of Personal Data in accordance with the laws; and
- e. Comply with regulations on Personal Data protection and participate in prevention against violations of regulations on Personal Data protection.

Article 8. Procedures for exercising your rights

If you request to exercise one of your rights detailed in Article 7.1 above, please contact us according to Article 10 hereinafter.

Any notice of the exercise of your rights shall clearly set out at least the following content: (a) Your contact (fullname, email or phone number); (b) The specific rights you would like to exercise and the categories of Personal Data subject to the requests; (c) The reasons for exercising your rights; and (d) Relevant information, documents to your exercise of your right.

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