

	<h1>Global Privacy Policy</h1>	Reference No.: 11-03
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1. About the Policy

SD Vietnam Industries Ltd. (“we”, “us” or “our”) have established this Global Privacy Policy (this “Policy”) for the purpose of properly processing the personal data and protecting the rights and interest of our stakeholders (collectively “you”).

This Policy explains how we process your personal data based on the laws related to processing your personal data. In accordance with applicable data protection laws and this Policy, we pledge to manage your personal data to be safe and appropriate by diligently pursuing the prevention of unauthorized use, disclosure, modification, etc. of personal data about you.

You may be subject to specific policies provided by our Group Companies (as defined below) and policies specific to certain products or services in conjunction with the Policy. These specific policies shall supersede this Policy to the extent that the clauses set forth in these policies contradict the clauses set forth in this Policy.

Particularly, if any laws of the following countries, regions or states are applicable, the following applicable policy shall also be applied in conjunction with the Policy.

- Japan: Japan Privacy Policy
- European Economic Area (EEA) /UK: EEA and UK Privacy Policy
- California: Addendum for California Privacy Rights Act

Our website may contain links to and from third-party websites. These third-party websites, and any services that may be accessible through them, have their own privacy policies. We are not responsible for any third-party’s privacy practices. We encourage you to be aware of this when you leave our website and to read the privacy policies applicable to these third-party websites.

2. Personal Data Obtained by Us

Categories of personal data obtained by us are as follows:

- **Identity and Contact Data**

Name, age, date of birth, gender, occupation, address, country of residence, and other information related to contact details, such as phone number, email address, and social media accounts;

- **Products and Services Data**

Information related to products and services you have purchased (including products and services you intend to purchase) (including product serial number, details of product model, information regarding warranties, information regarding the status and use of products, location information, service history, and store of purchase);

- **Communications Data**

Details regarding your opinions, requests, inquiries, survey responses and other information you provided;

- **Technical Data**

Technical data including access data, Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;

- **Usage Data**

Information about how you use our website, products and services;

- **Marketing Data**

Your preferences in receiving marketing from us or the third parties engaged by us and your communication preferences;

- **Application-related Information**

- Information relating to experience, education and right to work checks if you apply to work for us;
- Information related to an individual that is obtained or derived in order to achieve the purposes of processing personal data set forth in Section 4, and
- Information for which we provide a separate notice.

We will not obtain or use sensitive information that reveals your data concerning health, genetic data, data concerning sexual orientation, or the like, unless provided for in laws and ordinances or you consent to us doing so.

You may be required to provide us with certain data because the provision of personal data is required by statute or contract or for other reasons. In this case, if you do not provide your personal data, we may not be able to provide you with our service.

3. How We Collect Your Personal Data

We may obtain the personal data described above both directly from you, through third parties, such as contractors, business partners, and social media providers (including Facebook and Google), and through products and services provided by us.

More specifically, we collect and process the following personal data about you from each of these sources:

(1) Information you give us

This includes information about you that you give us through inquiry forms on our website, or by communicating with us, whether by e-mail, letter or otherwise.

(2) Information third parties give us

This includes information about you that third parties give us through inquiry forms on our website, or by communicating with us, whether by e-mail, letter or otherwise.

(3) Information we collect automatically from you

When you visit our website, the website automatically collects certain types of data related to you. These types of data include access logs, web beacons (also known as pixels), cookies, etc. These types of data may remain in your computer and continue to collect data.

4. Purpose of Processing Personal Data

The personal data collected by us is processed only by authorized personnel for specific tasks within the following purposes and the scope of applicable laws and regulations.

(1) Personal data of customers, suppliers, contractors, business partners or website users (collectively “Business Partners”)

- Promotion of our products and services including provision of related information (such as catalog delivery)
- Sales/supply of our products and services, and customer support
- Development of our products and services
- Delivery of direct marketing to prospective and current Business Partners regarding products, offers, promotions, rewards, events, and services offered

- Verification of eligibility and delivery of prizes, in connection with conducting promotions for Business Partners
- Analysis of the browsing history of Business Partners that they have provided to us through our website and social media, and other information of such Business Partners, thereby providing them with information on products that meet their preferences and tastes
- Analysis of the number of accesses made to the landing page as set up through our advertisements, thereby striving to improve the content of the advertisements and advertisement placements
- Fulfillment of any other business or commercial purposes at the direction of Business Partners, or with notification and/or consent thereof
- Performance of contracts with Business Partners
- Engagement in business negotiations, meetings, or other forms of communication with Business Partners (including audio recording and videotaping of the content of such meetings, etc.)
- Response to comments, questions, and requests from Business Partners, provision of after support service, and otherwise performance of services requested by Business Partners
- Conduct of questionnaire surveys of Business Partners and analysis of the results thereof

(2) Personal data of shareholders

- Exercise of rights and performance of obligations under applicable laws or regulations stipulated thereof
- Provision of services
- Implementation of various measures for shareholders
- Management of shareholder information based on laws and regulations, including creation of databases

(3) Personal data of employment applicants

- Provision of employment information to applicants and communication with them about selection procedures, either directly or through their universities or employment agencies
- Consideration of whether or not to hire the applicants
- Management of applicants who have been offered employment, and to perform other procedures related to applicants for employment

(4) Common purposes of use for all personal data

- Prevention of and response to fraud, violation of relevant policies and rules, threats, and damage
- Operation, management, and improvement of our website, social media accounts, applications, marketing activities, products, and services
- Analysis of data on access to our website and its contents and the access speed thereto, thereby striving to improve our website and its contents and to enhance our systems and servers
- Any other purposes individually notified or publicly announced to the extent that it is required by applicable laws and regulations

5. Legal Basis

We will process your personal data in accordance with the legal basis required by applicable laws and regulations. The legal basis to process your personal data may change subject to the applicable laws and regulations of the respective jurisdictions.

6. Disclosure of Personal Data to Recipients

We will not sell, rent or lease your personal data. We may disclose your personal data to the recipients described as follows or described in the specific policies to the extent necessary to pursue the purposes of processing personal data set forth in Section 4 and in accordance with applicable laws and regulations.

(1) Stock-holders

Companies are our stock-holders (proved by relevant documents on shareholders)

(2) Group Companies

Affiliates and related entities of Sumitomo Electric Industries, Ltd.

(3) Service Providers

Service providers, such as internet service providers, web analytics service providers, cloud service providers, software vendors, sales statistic analytics service providers, recruitment or employment agencies, professional advisors, or consultants.

(4) Others

Potential partners of Merger and Acquisition, legal or regulatory authorities, or other third party.

7. Cross-Border Transfers

We are engaged in business activities on a global scale, and in some cases, we will transfer your personal data to a country or a region that does not have data protection laws, regulations, and the like equivalent to those related to protection of personal data in the country or the region where you reside. Upon transferring your personal data abroad, we will take appropriate measures in accordance with provisions set forth in applicable laws and regulations.

8. Storage Limit for Personal Data

Unless indicated otherwise, we will retain the personal data that we collect about you for the period necessary to process such personal data, except to the extent that we are required by law to retain the data for a longer period of time, in which case we will retain it for the period required by law.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means, and the applicable legal requirement.

9. Your rights

Depending on where you reside, you may have a number of legal rights in relation to the personal data that we hold about you. These rights may vary depending on where you reside and data protection laws which will apply to the relationship between you and us, but would typically include:

- (1) The right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- (2) The right to request that we rectify your personal data if it is inaccurate or incomplete;
- (3) The right to request that we delete your personal data;
- (4) The right to request that we restrict our processing of your personal data;
- (5) The right to object to us about our processing of your personal data;
- (6) The right to withdraw your consent to our processing of your personal data. (This right only exists where we are relying on consent to process your personal data. Withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.)

As long as your request to exercise your rights are within the scope of applicable laws and regulations, you can exercise your rights by contacting us using the information about us in Section 12 below. Please note that we may charge a reasonable fee to you per processing your request when permitted by applicable data protection law. Also, please note that you may need to submit additional information to us to verify your identity before we process your request.

10. Security

To protect your personal data against accidental or unlawful destruction, loss, use, or alteration and against unauthorized disclosure or access, we use adequate organizational, human, physical, and technical security measures.

11. Changes to this Policy

We may modify this Policy from time to time and will post the updated Policy with a “Last Updated” effective date for the revisions. We recommend that you review this Policy periodically. If we make a material change to this Policy, you will be provided with appropriate notice, such as a notice posted on our website, contact window email or relevant notice.

12. Information About Us

- Name of the Controller: SD Vietnam Industries, Ltd.
- Main Office Address: Plot H2a-Thang Long Industrial Park, Vong La Commune, Dong Anh District, Hanoi, Vietnam
- Name of the Chief Personal Data Manager:
 - Full name: Nguyen Thi Giang
 - Title: Administration and Human Resources Section Manager
 - Email: nguyengiangsdv@sdvietnam.com

If you have any questions about this Policy, your rights, or any other issues regarding the protection of your personal data, you can reach us using our web or email above.

END