

## PRIVACY POLICY

Mirae Asset Prévoir Life Insurance Company Limited always strives to conduct business with honesty, sincerity and fairness as well as commits to comply with Decree 13/2023/ND-CP dated April 17, 2023 and the current legal regulations of Vietnam related to the protection of Personal Data. Therefore, Mirae Asset Prévoir Life Insurance Company Limited provides the privacy policy with the following details.

### CHAPTER I. TERMS AND DEFINITIONS

In this privacy policy, abbreviated terms in quotation marks will be used and construed as follows: “**Privacy Policy**” means this privacy policy which is newly issued, revised, amended and supplemented by MAP Life from time to time.

“**Company**” or “**MAP Life**” means Mirae Asset Prévoir Life Insurance Company Limited.

“**Partner**” means an organization or individual that enters into a contract with MAP Life for the purpose of collecting and/or processing Personal Data on behalf of MAP Life.

“**Decree 13**” means Decree 13/2023/ND-CP dated April 17, 2023.

“**Personal Data Controller**” means MAP Life.

“**Personal Data Processor**” means MAP Life and/or Partner.

“**Customer**” means the Policy Owner, the Insured, and the Beneficiary who prepares and declares information in the insurance application dossier.

“**Services and Products**” means the insurance products and services offered by MAP Life.

“**Insurance Contract**” is an agreement between the Policy Owner and MAP Life, whereby the Policy Owner must pay the premium, the Insurer must indemnify and pay the insurance premium as agreed.

“**Personal Data Processing Notice**” means the personal data processing notice set forth in the Privacy Policy.

“**Personal Data**” is information in the form of symbols, letters, numbers, images, sounds or similar forms in the electronic environment that is associated with a specific person or helps identify a specific person. Personal Data includes General Personal Data and Sensitive Personal Data.

### CHAPTER II. SCOPE OF APPLICATION

**Article 1** The Privacy Policy applies to all Customers who prepare, declare and provide information on the application dossier as well as use any Products and Services of MAP Life and all individuals and organizations involved in the collection and processing of Personal Data.

**Article 2** The Privacy Policy is referred to and referenced by the Application Form document, and when the Customer confirms on such document, this means that the Customer knows obviously, willingly agrees with the Privacy Policy.

### CHAPTER III. COLLECTING AND PROCESSING PERSONAL DATA

**Article 3** Types of Personal Data

1. General Personal Data includes: (i) Last name, middle name and first name, other names (if any); (ii) Date of birth; date of death or going missing; (iii) Gender; (iv) Place of birth, registered place of birth; place of permanent residence; place of temporary residence; current place of residence; hometown; contact address; (v) Nationality; (vi) Personal image; (vii) Phone number; ID Card number, personal identification number, passport number, driver’s license number, license plate, taxpayer identification number,

social security number and health insurance card number; (viii) Marital status; (ix) Information about the individual's family relationship (parents, children); (x) Digital account information; personal data that reflects activities and activity history in cyberspace; (xi) Information associated with an individual or used to identify an individual other than Sensitive Personal Data.

2. Sensitive Personal Data includes: (i) Political and religious opinions; (ii) Health condition and personal information stated in health record, excluding information on blood group; (iii) Information about racial or ethnic origin; (iv) Information about genetic data related to an individual's inherited or acquired genetic characteristics; (v) Information about an individual's own biometric or biological characteristics; (vi) Information about an individual's sex life or sexual orientation; (vii) Data on crimes and criminal activities collected and stored by law enforcement agencies; (viii) Information on customers of credit institutions, foreign bank branches, payment service providers and other licensed institutions, including: customer identification as prescribed by law, accounts, deposits, deposited assets, transactions, organizations and individuals that are guarantors at credit institutions, bank branches, and payment service providers; (ix) Personal location identified via location services; (x) Other specific personal data as prescribed by law that requires special protection.
3. MAP Life, and the Processing Data Processor engaged by MAP Life, may collect data from Customer upon Customer request, or in the course of providing to Customer by MAP Life, any Products and Services, and from a variety of sources, including but not limited to: (i) through the information on the insurance application dossier, the Insurance Contract, of the Customer at MAP Life or the information that MAP Life has obtained during the implementation of the Insurance Contract of the Customer (including the initial provision and subsequent updates, corrections and additions, as well as cases where data is provided via email, telephone, electronic communication methods); (ii) through the Customer's verbal and written communication with MAP Life and/or its authorized agents; (iii) from vendors, service providers, partners, merchants and third parties, including but not limited to survey consultants, social media, marketing, insurance screening, fraud prevention, data collection; (iv) infrastructure and vehicle support parties, and other third parties involved in MAP Life's business; (v) from third parties that have a relationship with the Customer, such as employers, account co-owners, guarantors, security providers, co-partners, co-managers and co-sharers winter; (vi) from any insurance reporting provider, insurance reference provider and government agency, or information obtained from any publicly available source, guideline, or registry; (vii) from the Ministry of Finance, Vietnam Insurance Association or other competent authorities in Vietnam or abroad; (viii) through archived video footage from surveillance cameras (CCTVs) at MAP Life's operating business; (ix) from the analysis of customers using and managing the Customer's account/utility(s) at MAP Life, from the transactions performed by the Customer and from the payment made from/to the Customer's account/utility(s); (x) through files generated by the website you visit (cookies) or similar monitoring devices/tools; (xi) from third party sources, to which Customer agrees to be collected, or sources where collection is required or permitted by law.
4. **Cookies**  
What are cookies? Cookies are files created by websites when the Customer visits. By storing information about a Customer's visit, cookies make Customer online experience easier... They will not be used to store or identify Customer's personal information. These Cookies are simply intended to move the information which Customer provides on one screen page to the next screen, eliminating requests for providing information again. These Cookies shall not collect any personal information of the Customer or of

the computer of the Customer. The Customer has the choice to accept or not accept Cookies, however, if the Customer refuses Cookies or if the Cookies function on the Customer's browser is disabled, some parts of this website will not work.

**Article 4** Purpose of Personal Data Collection and Processing

1. To implement underwriting and accept insurance for Customers.
2. To perform the rights and obligations specified in the Insurance Contract, including but not limited to: calculating the premium, issuing the Insurance Contract, collecting the premium, settling the payment of insurance benefits, reinsurance, setting up professional reserves.
3. To perform after-sales services such as promotions, customer care, respond to Customer inquiries and complaints and to resolve disputes in general, manage and record calls and electronic communications with the Customer and other relevant parties.
4. To conduct product design research: survey and analyze data relating to any product or service provided by MAP Life (whether conducted by MAP Life alone or jointly with other parties) that may be relevant to Customer.
5. To generate data, reports and statistics, to respond, either to MAP Life or to other relevant third parties of MAP Life or upon request of the Ministry of Finance or the competent authorities or other relevant third parties.
6. To study and evaluate the financial situation, solvency, capital adequacy, capital requirements.
7. To identify customers, detect, report, prevent, and investigate crimes, attacks, or violations including fraud, money laundering, terrorist financing, bribery, corruption, insurance fraud, tax evasion;
8. To collect, use, and transmit at the request of a competent governmental authority including providing the United States tax authorities with (i) the Customer's personal information as provided in the Insurance Contract or subsequently provided to MAP Life, including information on declaring tax and (ii) the Insurance Contract information, including the its number, its information, its cash value, and/or its account value, or during the term of the Insurance Contract, when the Customer is a taxable person or becomes a taxable person in the United States as defined under U.S. tax law.
9. To conduct a check with the anti-spam, spam email, spam call registration authority or other registration authority (if applicable).
10. To perform and comply with contractual agreements between MAP Life and its providers/service providers/partners.
11. For audit purposes, risk management and compliance with MAP life's internal policies.
12. For any other purpose required or permitted by any relevant laws, regulations, guidelines and/or regulatory authorities.
13. To perform other activities related to MAP Life's provision, operation, processing and management of the Products and Services to Customers, and to serve such other purposes as MAP Life deems appropriate from time to time.

**Article 5** Organizations and individuals that are allowed to process Customer's Personal Data: Mirae Asset Prévoir Life Insurance Company Limited, the US tax authorities, the Vietnam Insurance Association, the competent state agencies and other individuals and organizations that enter into a contract with MAP Life to process Personal Data for the Purposes of Personal Data Collection and Processing fore-mentioned herein.

**Article 6** Customer's Rights

1. **Right to know**  
Through the Insurance Application Form made and declared by the Customer as well as the Personal Data Processing Notice issued by MAP Life, the Customer is informed about the processing of his/her Personal Data.
2. **Right to consent**  
In the event that the Customer agrees or does not agree to allow the processing of his/her Personal Data, the Customer will submit a written request to MAP Life 30 working days in advance.
3. **Access rights**  
The Customer has access to view, correct or request correction of his/her Personal Data. MAP Life will comply with Customer's request to access or correct Personal Data within 72 hours of receiving a complete and valid request and related processing fee (if any) from Customer.
4. **Right to withdraw consent**  
Customer is entitled to withdraw his/her consent in writing for any or all of the purposes stated in Article 4 of the Privacy Policy and as instructed by MAP Life, except where MAP Life is processing Personal Data without Customer's consent. The Customer's withdrawal of consent does not affect the legality of MAP Life's data processing that was agreed by the Customer prior to the withdrawal of consent. However, when Customer withdraws its consent to process Customer's Personal Data in accordance with the Privacy Policy, MAP Life may not take the necessary actions to achieve the purpose of processing as described in Article 4 of the Privacy Policy, or Customer may not continue using products, services, or performing a contract with MAP Life. At that time, MAP Life may continue to process Customer's Personal Data to the extent required or in accordance with applicable law.
5. **Right to delete personal data**  
The data subject has the right to delete or request deletion of his/her personal data.
6. **Right to obtain restriction on processing**
  - a. The Customer has the right to obtain restriction on the processing of his/her personal data;
  - b. The restriction on the processing of personal data shall be implemented within 72 hours after receiving request of the Customer, and all personal data that the Customer requests the restriction, unless otherwise provided for by law.
7. **Right to obtain personal data**  
The Customer has the right to request MAP Life to provide him/her with his/her personal data.
8. **Right to object to processing**
  - a. The Customer has the right to object to the MAP Life processing his/her personal data in order to prevent or restrict the disclosure of personal data or the use of personal data for advertising and marketing purposes, unless such purposes are agreed and clearly stated in the Insurance Application Document and otherwise provided by law;
  - b. MAP Life shall comply with the MAP Life's request within 72 hours after receiving such request, unless otherwise provided for by law.
9. **Right to file complaints, denunciations and lawsuits**  
MAP Life has the right to file complaints, denunciations and lawsuits as prescribed by law.

10. Right to claim damage
  - a. The Customer has the right to claim damage as prescribed by law when there are violations against regulations on protection of his/her personal data with the maximum compensation level according to the content of point b hereinafter.
  - b. The Customer and MAP Life agree that the total damages as set out in this clause will not exceed the total cumulative premiums that MAP Life has received from the Customer since the Insurance Contract took effect.
11. Right to self-protection  
The Customer has the right to self-protection according to regulations in the Civil Code, other relevant laws and the Decree 13, or request competent agencies and organizations to implement civil right protection methods according to regulations in Article 11 of the Civil Code.

**Article 7** Customer's obligations

1. Protect his/her own personal data; request relevant organizations and individuals to protect his/her personal data.
2. Respect and protect others' personal data.
3. Fully and accurately provide his/her personal data when he/she consents to the processing.
4. Participate in dissemination of personal data protection skills.
5. Comply with regulations of law on protection of personal data and prevent violations against regulations on protection of personal data.

**CHAPTER IV. PERSONAL DATA PROCESSING NOTICE**

In order to comply with Article 13 of Decree 13, the Personal Data Processing Notice to Customers includes the following contents:

**Article 8** Purpose of processing

The Personal Data Controller and the Personal Data Processor are permitted to process personal data for the purpose of collecting and processing Customer Personal Data as stated in Article 4 Chapter III of the Privacy Policy and to the extent otherwise permitted by law.

**Article 9** The types of Personal Data used are relevant to the purposes of processing  
As clearly stated in Article 3 Chapter III of the Privacy Policy.

**Article 10** Method of processing Personal Data

MAP Life and/or Personal Data Processor will carry out processing activities that impact Personal Data, such as: collection, recording, analysis, confirmation, storage, rectification, disclosure, combination, access, traceability, retrieval, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction or other relevant activities. This data processing includes both General Personal Data processing and Sensitive Personal Data processing.

**Article 11** Processing of children's Personal Data

MAP Life understands very well the importance of protecting children's Personal Data. MAP Life was, is and will always apply additional, appropriate processes and safeguards to contribute to ensuring the safety of children's Personal Data on the principle of protecting the rights and the best interests of the children.



Before processing children's data, MAP Life requires the consent of the child in the case of a child aged 7 years or older (up to under 16 years old), and the consent of a parent, or guardian according to the provisions of law, unless otherwise provided by law.

MAP Life will implement necessary measures, as required by law, to verify the age of children before processing their personal data.

MAP Life will cease to process children's personal data, delete or destroy children's personal data in cases prescribed by law, for example (i) when the child's parent or guardian withdraws consent to process children's personal data or (ii) at the request of a competent authority.

**Article 12** Processing personal data of people declared missing or deceased

Trước khi xử lý dữ liệu cá nhân liên quan đến dữ liệu cá nhân của người bị tuyên bố mất tích, người đã chết, MAP Life sẽ cần có sự đồng ý của vợ, chồng, hoặc con thành niên của người đó, trường hợp không có những người này thì sẽ cần có sự đồng ý của cha, mẹ của người đó, trừ trường hợp pháp luật quy định khác đi, ví dụ như những trường hợp MAP Life được xử lý dữ liệu cá nhân mà không cần sự đồng ý của chủ thể dữ liệu.

**Article 13** Processing of Sensitive Personal Data

Prior to processing personal data related to the personal data of a person declared missing or deceased, MAP Life will obtain the consent of such person's spouse, or adult child; in the absence of these people, the consent of that person's father or mother, unless otherwise provided by law; for example: the cases where MAP Life processes personal data without the consent of the data subject.

**Article 14** Information about other organizations and individuals related to processing purposes  
Miare Asset Prévoir Life Insurance Company Limited, US tax authorities, Insurance Association of Vietnam, competent state agencies and other individuals and organizations sign contracts with MAP Life to process Personal Data for the purpose of carrying out the fore-mentioned Personal Data Processing Purposes.

**Article 15** Undesirable consequences and damage that may occur

1. Processing a request for Customer rights:

As mentioned in Article 6, the Customer has rights and requests that MAP Life perform while processing the Customer's personal data. MAP Life may need a reasonable period (depending on the complexity and impact of the Customer's request) to process the request and/or to notify of any unwanted consequences or damages may occur if the Customer's request is fulfilled.

Note:

- a. Based on the nature and scope of the Customer's request, MAP Life may not to continue providing the service, and as required by law depending on each case, MAP Life will notify the Customer prior to completing the processing of the Customer's request.
- b. In certain cases, MAP Life cannot accept the Customer's request. For example, if the Customer requests that MAP Life delete personal, transactional data while MAP Life is legally obligated to maintain records of that individual, contract, or transaction for compliance and provided according to legal regulations.
- c. Where MAP Life may not implement the Customer's request to withdraw consent while MAP Life is performing its contractual obligations with the Customer; or need to immediately process relevant personal data to protect the life and health of the data subject or other person in accordance with the law.

2. Processing of Personal Data may pose a risk of data leakage or inappropriate data processing. Understanding the importance of protecting personal data, MAP Life considers information as its valuable asset and therefore MAP Life attaches great importance to ensuring the safety of Customers' personal data. MAP Life regularly reviews and updates its technical and management measures when processing Customer personal data.
3. MAP Life employees are trained to handle personal data safely and with the utmost respect, and their violations will result in disciplinary action.

**Article 16** Start time and end time of data processing.

MAP Life and the Data Processor will process the Customer's personal data for as long as is required in the relationship with the Customer, in compliance with this Personal Data Processing Notice and/or the terms and conditions in other agreement(s) between the Customer and MAP Life, for such period as is otherwise necessary to satisfy the interests of MAP Life and/or the Customer, or when laws and/or regulations MAP Life's relevant internal regulations, or for such other period as the purposes for the processing of the Customer's Personal Data remain valid.

## **CHAPTER V. PERSONAL DATA SECURITY**

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**Article 17** Personal Data Security

1. MAP Life considers data security as a high priority and makes the best effort to protect Customer Personal Data from unauthorized or unintentional use. MAP Life takes many measures to secure Customer Personal Data such as within information technology hardware and software systems, electronic systems and management policies. MAP Life's website supports the use of SSL SHA-2 encryption technology - a standardized and recognized internet data encryption technology.
2. The Personal Data which provided by the Customer will be accessed by a number of MAP Life employees and Partners who need to know such information to serve the Customer's requests. MAP Life maintains Personal Data protection measures and procedures that comply with the provisions of law to protect Personal Data. MAP Life will retain collected Personal Data for as long as required or permitted by law.
3. By accessing MAP Life's website and providing personal information, MAP Life may obtain general statistical information (from log files) such as: name domain, IP address or browser type of users of MAP Life's website. The information obtained from log files will not contain information that helps identify individuals, such as name, address, phone, etc. and is only used for general statistical purposes.
4. MAP Life's server system is protected by a specialized firewall system and is monitored 24/7 to prevent unauthorized intrusion into the system. MAP Life personnel are authorized to operate on the system and all operations are recorded in a logfile. In order to ensure that Customer data is sent to the correct MAP Life email, MAP Life recommends that Customers send email via the "Contact Us" section on MAP Life's website.

**Article 18** Internet fraud prevention

Customers and MAP Life both play an important role in preventing fraud through internet. Besides, MAP Life makes the best effort to maintain a high level of system security. The Customer's eServices account name and password are unique and not identical to others, and MAP Life will never ask the Customer for the eServices access password. Nevertheless, the Customer must keep the Customer's Electronic Services account name and password confidential and must not disclose, notify and/or provide the Electronic Services account name and/or password to another person or use the Electronic Services with an unauthorized person for the same account. Customers should set a password that is at least 8 characters long and the password must contain uppercase letters, lowercase letters, numbers and special characters. Personal information of the Customer or Customer's relatives (for example, birthday, phone number or English name of the Customer) should not be used to set a password for an e-Service account. As soon as they discover that their Electronic Services password has been disclosed, lost or stolen, or when there is suspicion of unauthorized use or transactions of their Electronic Services account, Customers must notify Report immediately, without delay, to MAP Life.

**CHAPTER VI. AMENDMENTS TO PRIVACY POLICY**

The Privacy Policy may be amended from time to time at MAP Life's sole discretion. Any modifications will be posted on MAP Life's website and/or other means of communication as MAP Life deems appropriate.

**CHAPTER VII. CONTACT MAP LIFE ABOUT PROCESSING OF PERSONAL DATA**

If you have any questions regarding the Privacy Policy or how MAP Life processes your Personal Data, please feel free to contact any customer service staff as information hereafter:

**Head office**

Hotline: 1900 6603  
Fax no.: (84-28) 3823 7349  
Email: dichvukhachhang@map-life.com.vn  
Address: 6A-8th Floor Saigon Giai Phong Building, 436-438 Nguyen Thi Minh Khai, Ward 5, District 3, City. Ho Chi Minh.

**Branch office at Hanoi**

Hotline: 1900 6603  
Fax no.: (84-24) 3934 4940  
Email: dichvukhachhang@map-life.com.vn  
Address: 9th floor, Song Hong Sun Building, 23 Phan Chu Trinh, Hoan Kiem District, Hanoi.