

VIETNAM PERSONAL DATA NOTICE (FOR WORKERS AND JOB CANDIDATES)

We are committed to protecting the privacy, confidentiality and security of the personal data we hold by complying with the requirements of applicable data protection regulations of Vietnam, including Decree No. 13/2023/ND-CP dated 17 April 2023 of the Vietnam Government on Personal Data Protection (“**PDPD**”). We are equally committed to ensuring that all our employees and agents uphold these obligations.

This Vietnam Personal Data Notice (for Workers and Job Candidates) (this “**Privacy Notice**”) explains what information we gather about you, what we use that information for, the lawful basis on which that information is used and who we give that information to. It also sets out your rights in relation to your information and who you can contact for more information or queries.

1. What this Privacy Notice covers and who it applies to

- To run our business, we collect and use information associated with and/or helping to identify a living individual (also known as “**Personal Data**”), including information about our prospective, current and former employees.
- This Privacy Notice applies to you if you have a current or past employment or service relationship with a Vietnam affiliate of the Jardine Matheson Group (“**we**”, “**our**”, or “**us**”). We will act as a Personal Data controller and/or a Personal Data controlling and processing entity (as used and defined under the PDPD) with respect to the Personal Data about you as an employee or a staff (including but not limited to those who are employed by a third-party staffing agency and are dispatched to work for us) (hereinafter referred to as the “**Workers**”).
- This notice also applies to you if you (hereinafter referred to as the “**Job Candidate**”), directly or through an employment agency, submit Personal Data to us in order to apply for a job position, for which we will also act as a Personal Data controller and/or a Personal Data controlling and processing entity.
- If you have any questions or comments about this Privacy Notice, please contact privacy@jardines.com.

2. What information do we collect?

For Workers, we collect both basic Personal Data and sensitive Personal Data (as defined under the PDPD) of you and, where relevant, your family members, as necessary and appropriate, including:

- Detailed identification information (e.g., your name, position and title; your nationality, gender, date of birth, profile picture, citizenship status, address, ID card, passport numbers and other national ID numbers as required; private email, private phone number, permanent and/or current residence address and/or country of residence);
- Electronic identification data (e.g., your email address, login information, access rights, badge number, IP address, online identifiers/cookies, log files, connection time, sound or image recordings such as CCTV or voice recordings; business email content, business documents and business communication contents and similar data generated by you; other computer usage information related to your use of company equipment, systems, and other resources; internet usage data, etc.). Please note that you should have no expectation of privacy when using company equipment, systems, and other resources;
- Information about your family (e.g., marital status, marriage certificate, details of

child(ren), spouse or partner, parents, and/or other dependents, emergency contact information);

- Education and employment information (e.g., remuneration, bonus, insurance and other benefits information, employment dates such as dates of hiring/promotion/position change, performance evaluation, position information such as position title and reference number, attendance information including where relevant, visa or work permit details, illness or leaves of absence for medical reasons, language skills, social insurance, health insurance and pensions information including entitlements, details of nominated beneficiaries, death certificates and powers of attorney, recruitment information including job applications, CVs, job history and references, proof of termination of employment); and
- Financial information (e.g. bank account details, professional credit card numbers, and tax-related information including tax resident details for compliance with applicable tax regulations).

For Job Candidates, we usually collect:

- Basic identification information (e.g., name, gender, nationality, citizenship status, email address and phone number);
- Education and employment information (e.g., education background, professional qualifications, language skills, copies of education and profession certificates, recruitment information including job applications, CVs, job history and references, proof of termination of employment, visa or work permit details);
- Background check information (including health and criminal checks and screening) to the extent permitted by applicable law; this information is usually collected through a qualified employment agency or health examination center or publicly available sources as needed to support the recruitment process;
- Electronic identification data (if you visit our company websites for job postings, we may collect information such as IP address, online identifiers/cookies, log files, and connection time; if you attend job interviews either onsite or online, we may collect sound or image recordings such as CCTV or voice recordings); and
- Other information that you may provide, e.g. personal interests.

For both Workers and Job Candidates, in certain cases, the Personal Data that we process will also include sensitive Personal Data, such as your bank account numbers, diversity-related information (including data about racial and ethnic origin, or political opinions, religious beliefs and other beliefs of a similar nature, and data about sexual life and sexual orientation), or health data (such as sickness records, disability records, health examination reports, fitness for work records and information on pensions, work injuries and/or health insurance where it contains data relating to sickness) and data about alleged or proven criminal offences in each case where permitted by law and sound or image recordings such as CCTV or voice recordings (if considered as biometric information under applicable law).

Where applicable, for Workers, we also collect more detailed Personal Data about your family (e.g. your spouse or partner, parents, dependents, children or other next of kin). Before providing us with any such Personal Data, you must comply with all necessary procedures and requirements under applicable data protection regulations of Vietnam, including but not limited to informing the relevant individuals that you will disclose their Personal Data to us, providing a copy of the information in this privacy notice to them, and obtaining a valid consent from the data subject for your collection and sharing of the relevant individuals' Personal Data to us. You shall be responsible for and hold us harmless against any and all of your failures to comply with applicable data protection regulations of Vietnam.

In some cases, the Personal Data we collect from you is needed to meet our legal or regulatory obligations or to perform our obligations under your employment contract (or to enter into that contract). If so, we will indicate to you that the provision of this information is mandatory, and the consequences if we cannot collect this information.

In some cases, we will also collect Personal Data about you indirectly from our service providers (e.g., recruiters and third parties who perform background checks for us), other Workers (for example in any complaints submitted about you), and from local authorities about your social insurance, and publicly available sources such as business and employment oriented social networking services (such as LinkedIn and Facebook) and jobs boards (such as jobsDB).

3. How we use information about you

We process Personal Data of Workers, by automated or non-automated means, for the following purposes:

Employment/Working Related Purposes:

- undertake staff evaluation and promotion activities, such as determining the suitability of an employee's qualifications for a new role;
- administer, plan and manage our personnel (including task, benefits and absence management, succession planning, staff turnover, issuing tax declaration forms and filing the related data, employee participation programmes, employee events/leisure activities);
- assist us in managing external providers (e.g. insurance companies, pension funds, etc.) and benefitting from their goods and services;
- train our staff;
- manage our payroll bonus compensation schemes, and further bookkeeping obligations;
- manage our HR records, carry out performance reviews and satisfaction surveys, manage and investigate our employees' activities in the workplace (including compliance with internal policies) and manage any disciplinary actions and complaints;
- manage social insurance, health insurance and pension plans for employees and nominated beneficiaries (if applicable); and
- manage our IT resources, including infrastructure management & business continuity.

Complying with legal obligations:

- satisfy applicable legal or regulatory requirements; and
- respond to requests from, and other communications with, competent public or judicial authorities.

Sharing data following mergers and acquisitions:

- enable a transfer to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of the Jardine Matheson Group's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it.

Business development and communications-related purposes:

- communicating contact details of one of our Workers to a customer or supplier (indicating that this person is the contact person within the Jardine Matheson Group) in our offer of products and services to our customers;

- displaying your Personal Data on our website or in other situations connected with marketing or business relations, to the extent not covered by Public Use (as defined below). If you do not consent to this purpose, your presence and contact details will not be available on our website, among others; and
- sending you information and advertising materials about products and events. If you do not consent to this purpose, you might not be able to get updated on any products or events of ours or other affiliated entities.

Corporate social responsibility objectives:

- meeting our corporate social responsibility objectives, such as reducing waste, conserving resources, committing to renewable energy, organizing or committing to charity events/donations, committing to diversity, equity and inclusion.

Company events and campaigns-related purposes:

- assessing your eligibility and enrolling you in our employee participation programmes, employee events or leisure activities. If you do not consent to this purpose, you will not be able to participate in any of our events and campaigns, pursuant to applicable laws and contracts.

Catering-related purposes:

- ordering special dietary food or accommodating food allergies, to the extent not covered by those under a contractual or legal obligation. By refusing to agree, we will not be able to cater to your special diets or food allergies; and
- providing support for employees with disability, to the extent not covered by those under a contractual or legal obligation.

We process Personal Data of Job Candidates, by automated or non-automated means, to:

- evaluate the suitability of you for the role, conduct pre-employment screening and verification of information provided by you, and/or make arrangement for your potential employment (such as supporting your work visa application or citizenship status relocation);
- administer and improve our recruitment and employment process;
- satisfy applicable legal or regulatory requirements; and
- respond to requests from, and other communications with, competent public or judicial authorities.

4. The legal grounds we use for processing Personal Data

We will only process your Personal Data, when we have a legal basis for the processing as identified below:

- Your valid consent ("**Consent**");
- Performance of an employment contract with an employee, or performance of other types of contracts (other than an employment contract) between the Workers and the Company, if any ("**Contract Performance**");
- The Personal Data has been lawfully made public and the processing of such data is to a reasonable extent in accordance with applicable laws ("**Public Use**");
- Compliance with legal obligations, in particular in the area of labor and employment laws, data

protection laws, tax laws, corporate compliance laws, and other applicable laws ("**Legal Obligations**"); and

- Protection of the life and/or health of you or of other individuals in emergency situations ("**Life & Health Protection**").

5. Who we disclose your Personal Data to

5.1 Within the Jardine Matheson Group

We typically transfer Personal Data to members of our personnel and other companies in the Jardine Matheson Group to complete the purposes indicated in section 3 above. Such other companies of the Jardine Matheson Group will either act as another controller under this privacy notice or will only process Personal Data on behalf and upon request of the controller.

5.2 Outside the Jardine Matheson Group

We also usually transfer Personal Data to third parties outside the Jardine Matheson Group to complete the purposes listed in section 3 above including:

- third party service providers, such as our (IT) systems providers, our hosting providers such as Irasia, our payroll providers, consultants (including lawyers and tax accountants), recruiters, public relationship advisers and other goods and services providers (such as mobility service providers);
- a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of the Jardine Matheson Group's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- any local, national and/or international regulatory or enforcement body or court or other form of tribunal where we are required to do so by applicable law or regulation or at their request;
- our customers (e.g. we communicate professional contact details of one of our Workers to a customer);
- trustees, such as Butterfield Trust (Bermuda) Limited or service providers (such as our actuary, Willis Towers Watson) of an employee pension fund; and
- any central or local government department and other statutory or public bodies.

5.3 Transfers outside Vietnam

The Personal Data transferred within or outside the Jardine Matheson Group as set out in sections 5.1 and 5.2, may also be processed in a country outside Vietnam. Those countries typically include Hong Kong and Singapore. Your Personal Data may also be disclosed to other jurisdictions such as Bermuda (for the purposes of administering pension plans by the trustee) and where we have business operations, such as the European Economic Area, the People's Republic of China and other countries in South East Asia including Thailand, Malaysia, and Indonesia.

If your Personal Data is transferred outside Vietnam, we will put in place suitable safeguards to ensure that such transfer is carried out in compliance with applicable data protection rules.

Further details of the transfers of your Personal Data outside of your country of residence and the adequate safeguards used by the Jardine Matheson Group in respect of such transfers (including copies of relevant agreements) are available from us by contacting privacy@jardines.com. You can also use this e-mail address to request further information about the entities that comprise the Jardine Matheson Group and the countries in which they operate.

6. How long we keep your Personal Data

We will only retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. In general, although there may be limited exceptions:

- (a) Workers' Personal Data (including those relating to their dependents, if any) is kept for seven (7) years after termination of employment, although we may continue to keep such Personal Data for a longer time if we have obtained your consent to do so;
- (b) Personal Data relating to pensioners or other benefit users is kept for seven (7) years from the date when their entitlements have ceased unless we are requested to delete such Personal Data earlier; and
- (c) Personal Data of Job Candidates is kept for no longer than five (5) years from the date when they submitted the last job application.

7. Protection of your Personal Data

We use a range of physical, electronic and managerial measures to ensure that we keep your Personal Data secure, accurate and up to date. These measures include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling Personal Data;
- administrative and technical controls to restrict access to Personal Data on a 'need to know' basis;
- technological security measures, including fire walls, encryption and anti-virus software; and
- physical security measures, such as staff security passes to access our premises.

However, although we strive our best to securely process your Personal Data, we cannot completely prevent unauthorized access to your Personal Data from third parties such as hackers. In such instances, we will comply with all applicable regulations to handle the data breach, including the reporting obligation when so required.

8. Your rights and obligations and how to contact us

You have various rights in relation to your Personal Data. In particular, you have a right to:

- be informed of the processing of your Personal Data;
- give consent to our processing of your Personal Data (to the extent such processing is based on consent);
- object to the processing of your Personal Data;
- request a copy of the Personal Data we hold about you;
- ask that we update the Personal Data we hold about you, or correct such Personal Data that you think is incorrect or incomplete;
- ask that we delete Personal Data that we hold about you, or restrict the way in which we use such Personal Data;
- withdraw consent to our processing of your Personal Data (to the extent such processing is based on consent); and
- self-defend and other relevant rights under applicable laws.

You also have certain obligations under applicable laws, including but not limited to providing us with your full and accurate Personal Data when consenting to our processing of your Personal Data.

We will honour any requests, withdrawals or objections as required under applicable data protection rules but these rights are not absolute, they do not always apply and exemptions may be engaged. If we do not comply with your request, we will explain why.

To exercise any of your rights, or if you have any other questions about our use of your Personal Data, please e-mail us at privacy@jardines.com. You may also use these contact details if you wish to make a complaint to us relating to your privacy.

If you are unhappy with the way we handled your Personal Data or any privacy query or request you have raised with us, you also have a right to complain to a data protection regulator in the place where you live or work, or in the place where you think an issue in relation to your Personal Data has arisen.

9. Changes to this Privacy Notice

This Privacy Notice was last updated on 1 July 2023.

This Privacy Notice may be subject to amendments. Any future changes or additions to the processing of Personal Data as described in this notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.