

PRIVACY POLICY

VinAcademy Education and Training Limited Liability Company and VinUniversity established by VinAcademy (collectively, "**VinUniversity**") is committed to safeguarding the privacy of every individual's personal information. This Privacy Policy ("the Policy") describes how VinUniversity collect and use your personal information in relation to your use of, or supply of relevant information via, our websites, applications, products and services and programs administered by VinUniversity (together, "**VinUniversity's Services**") in the manner specified in this Privacy Policy.

For clarification, "personal information" is all information that identifies or can identify an individual.

Any products, applications, websites, or content that are offered by third parties or have their own Privacy Policy are not covered by this Privacy Policy.

This Privacy Policy includes the following contents:

1. *What We Collect*
2. *How We Use*
3. *Collection and use of cookies*
4. *How We Share*
5. *Where We Store*
6. *How We Secure*
7. *Internet Advertising and Third Parties*
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1. What We Collect

Depending on how a person interacts with us and the purpose of that interaction, VinUniversity might collect varied information about you, based on the requirements of providing VinUniversity's Services to you.

Here are the information we may collect about you:

- Contact Information: Name, physical address, country, province, phone number, email address, emergency contact information, family information, and other significant contact information.
- VinUniversity Information: VinUniversity identifiers (e.g., NetID and/or EmployeeID), current grade level, current college if transferring, graduation date, and group and/or organization memberships.
- Employment Information: Company name, address, phone, fax, email, website, description, parent organization, union membership status, position/title, years in job, responsibilities, position you report to,

next step in career path, previous positions, employers and years, resume (file-upload), and other significant employment information, payroll data, title, years of service, and tax information

- Family information: your citizenship, date and place of birth, information about your parents or caretakers, income and payment information, your references, your ID number.
- Academic Information: High school (HS), HS address, HS GPA, Test Scores: SAT, ACT, GMAT, TOEFL, IELTS, AP/IB scores, summer college and GPA, previous college names, degrees, GPAs, current college, current class (Freshman – Senior), major/concentration, course grades, bursar data, and other significant educational background
- Travel Information: Date/time of arrivals and departures, Flight numbers and airlines, mode of transportation if not flying, accommodations while in Ithaca/Vietnam, and other travel information.
- Professional Business Analysis Tools: (Very specific information on your business including but not limited to: business name, address, type, size (sq. ft/meter.), number of employees, titles, positions, wages, cost of running business, restaurant data, data related to employee recruitment or departure.
- Engagement information: Event attendance, volunteer interests, organization affiliations, committee participation, alumni memberships, awards, and honors_
- Giving information: Information regarding any donation which is made, information that indicates your interest in giving back to VinUniversity

Here are the sources from which we gather your information:

- Information Given to Us: You may provide us with information about you in relation to VinUniversity's Services.
- Automatic Information: Certain types of information is automatically obtained by us when you interact with VinUniversity's Services.
- Other Sources of Information: We might receive information about you from such other sources as service suppliers, partners, and publicly available sources.

At VinUniversity we frequently provide an option to edit or remove yourself from any specialty mailing list and/or service you may have joined that collected personal information about you. Please refer to Article 8 - **Access and Option** for further information. Select retention of information about individuals may not contain an opt-out option if they are considered to be a critical for life, safety, research, administrative or regulatory compliance needs.

2. How We Use

VinUniversity's core functions lead to engagements to the complex, rich and expansive research and teaching community. Your personal information may be used to enable VinUniversity's mission. We use your information including, but are not limited to, the following:

- Academic Affairs activities (Education and education support; Research and research support): To consider your application for admission, enrolment, content delivery and learning activities; To associate you with your VinUniversity records and engagements, as well as for internal, administrative, and academic support needs; To perform assessment, graduation, services (e.g. library, wellbeing, support), handling disputes, investigations, audits, data analysis and improvements, general administration and enquiry management; To participate in research projects including participant data, administration and commercialisation.
- Community and industry engagement: To perform website operation, addressing enquiries and requests, marketing, customer relations, mailing lists and newsletters, event invitations, alumni and donor relations.

- Employment and employee support: To perform recruitment (including referees), payroll, health and safety, learning and development for staff and other Human Resources programs, contractors and volunteers.
- Operational management and finances: To support with your travel plans and your stay while attending our programs here at VinUniversity; To perform financial management, processing fees, IT security and management, data analysis, legal and professional services, analysing and improving our courses, research and education opportunities, business and services.
- Infrastructure and facilities: To perform analytics on access and management systems, CCTV, identity management, security and emergency response, including to lessen or prevent threats to safety.
- Campus life: To perform analytics on the information you provide to help you in decision making; offer assistance, web or printed materials, services, and support upon your request; To provide disability and dietary accommodations for events and programs, as well as linking students with diversity and inclusion opportunities and events on campus
- Comply with Law: In certain cases, the law requires us to collect, use, or retain your personal information. The processing of this information is necessary for us to comply with our legal obligations as well as our legitimate interests to ensure that documents comply with applicable law.
- Contact You: To communicate with you in relation to VinUniversity's Services through relevant channels such as email and chat and to answer your requests; To share VinUniversity-related news, publications, courses, events, programs, and other opportunities tailored to your interests; To fundraise; To perform outreach and marketing about VinUni upon your agreement.
- Prevention of Fraud and Abuse and Credit Risks: To locate and handle fraud to protect our customers, ourselves, and others. We may also use scoring methods to assess and manage credit risks.
- Assess, Evaluate, and Improve VinUniversity's Services: To assess the use, evaluate performance, fix bugs, support and develop VinUniversity's Services.
- Other Purposes Where Consent is Required: We will ask for your consent when we use your personal information for certain relevant purposes that we communicate to you.

3. Collection and use of cookies

We use cookies, pixels, and other similar technologies (collectively, "cookies") to recognize your browser or device, understand more about your preferences, deliver to you certain basic features and services, and for other purposes, including:

- Identifying you when you sign in to use VinUniversity's Services. This allows us to provide you with suggestions, display content personalized to you, and provide other customized features and services.
- Paying attention to your preferences so we can know what you like and do not like, such as the language and configuration that you chose.
- Researching and analyzing information to improve VinUniversity's Services.
- Preventing fraudulent activity. Preventing fraud, and situations that cause a potential threat to the safety or property of any person.
- Improving security and safety.
- Securing your information and our services from unauthorized access, loss, and misuse.

- *Delivering content, including ads, relevant to your interests on our sites and third-party sites.*
- *Evaluate the performance of VinUniversity's Services.*

Cookies allow you to utilize certain essential features of ours. Third parties may also collect information via cookies when you interact with VinUniversity's Services. Third parties usually include search engines, providers of measurement and analytics services, social media networks, and advertising companies. Third parties use cookies while delivering content, such as interest-based ads, to assess the effectiveness of their ads, and to perform services on our behalf.

You can manage browser cookies through your browser settings. Through the 'Help' feature on most browsers, you will know how to prevent your browser from accepting new cookies, how to receive notification from the browser when you receive a new cookie, how to disable cookies, and when cookies will expire. If you disable all cookies on your browser, neither we nor third parties will transfer cookies to your browser. If you do this, however, you may need to manually adjust some preferences every time you visit a site or application, and some features and services may not work.

4. How We Share

Information about our students and customers is important to us and our business does not sell our customers' personal information to others. We share your information internally within VinUniversity as needed to fulfill our educational mission. In addition, VinUniversity works with many external service providers, institutions, and other collaborators to advance its mission. In doing so, we may share your personal data as described below.

- *Service Providers:* *We may share your personal data with third-party service providers that complete transactions or perform services on our behalf or for your benefit, including, but not limited to, the following:*
 - *Educational or research operations and collaborations;*
 - *Course platforms or tools that enable or enhance our offerings;*
 - *Registration, enrollment verification and coordination for courses and events;*
 - *Course administration, evaluation, and assessment;*
 - *Payment and contribution processing;*
 - *Customer relationship management services;*
 - *Processing admissions and financial aid applications;*
 - *Student, alumni, and donor outreach and engagement;*
 - *Social networking, email and communications services;*
 - *Workforce administration and operations;*
 - *System maintenance, security and other technology services;*
 - *Marketing and data analytics;*
 - *Facilitating other transactions with you;*
 - *Legal compliance.*
- *Other Institutions & Collaborators:* *We may share your personal data with other institutions for the purposes of delivering programs and services including, but not limited to, the following:*

- *Registration, enrollment verification and coordination for courses and events, including cross-registration for courses and events with other universities;*
- *Course administration, evaluation, and assessment;*
- *Study at other universities, including study abroad at foreign universities;*
- *Online education offerings through online platforms;*
- *Research arrangements with other universities or collaborators; and*
- *Events and activities of VinUniversity-affiliated clubs and special interest groups.*
- *Protection of Us and Others: We may disclose account and other personal information when we believe such disclosure is required by law, to enforce or apply our terms and other agreements, or to protect the rights, assets, or the safety of ourselves, our students, our faculty and staff, our customers, or others. This may include releasing exchanging information to other organizations to prevent, detect fraud and credit and property risk.*
- *Your Choice: Other than as set out above, you will be notified when your personal information is shared with third parties, and you can elect not to share the information.*

5. Where We Store

VinUniversity is located in Vietnam, and our affiliated companies are located in many countries and regions in the world. Depending on your use of VinUniversity's Services, your personal information may be stored in or accessed from multiple countries, including Vietnam. Whenever we transfer personal information to other countries, we make sure that the information is done so in accordance with this Privacy Policy and as authorized by data protection laws.

6. How We Secure

At VinUniversity, security is our highest priority. We design our systems with your security and privacy in mind.

- *We employ appropriate technical and security measures to prevent unauthorized access and use of your personal information. We also regularly cooperate with security experts to be updated with the latest information on network security to ensure the safety of your personal information. When collecting data, we maintain and secure your personal information at a server system and these information is secured by firewalls, access control measure and data encryption.*
- *However, there are no data protection measures that fully guarantee security requirements. You should take steps to protect against unauthorized access to your passwords, your phones and computers by logging out after using a shared computer, selecting a strong password that no one else knows about, or can easily guess and keep your login and password confidential. We are not responsible for any lost, stolen or compromised passwords or for any activity on your account through unauthorized password activity.*
- *The information of your card, which is issued by the relevant financial institution, is protected by us in accordance with international standards on the principle that no important data of the card (card numbers, full names, CVV number) is recorded in our system. Your payment transaction is made by the relevant bank system.*

7. Internet Advertising and Third Parties

VinUniversity's Services may include third-party advertising and links to other websites and applications. Third party advertising partners may collect information about you when you interact with their content, advertising, or services. This Policy does not apply to any third-party operators' access to and use of links or websites, instead, the Privacy Policy of these third parties shall apply. We are not responsible for the data practices of third parties. To opt out of interest-based advertising, please see the Collect and use of cookies section above

8. Access and Option

You can see, update, and remove certain personal information about your account and your interactions with VinUniversity's Services. Do let us know if you cannot access or update your information yourself.

You have many options in relation to the collection and use of your personal information. Many of VinUniversity's Services include settings that provide you with options as to how your information is being used. You can choose not to provide certain information, but then you might not be able to utilize certain VinUniversity's Services.

- Account Information: If you want to add, update, or delete information related to your account, please go to VinUniversity's customer information portal. When you update or delete any information, we usually keep a copy of the prior version for our records for technical purpose.
- Communications: If you do not want to receive promotional contents from us, please unsubscribe or adjust your communication preferences by emailing your request to info@VinUniversity.edu.vn. If you do not want to receive in-app notifications from us, please adjust your notification settings in the app or your device.
- Browser and Devices: The Help feature on most browsers and devices will tell you how to prevent your browser or device from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

9. Minor's Personal Information

If you're under 18, please remember to get your parent or guardian's consent before entering into agreements and this Privacy Policy.

10. How Long We Store Personal Information

We retain your personal information to ensure your continued use of VinUniversity's Services, for as long as it is needed to meet the relevant purposes described herein, as may be required by law (including for tax and accounting purposes), or as otherwise informed to you. How long we keep certain personal information will be different based on the purpose for its use, and we will adhere to the law when deleting your personal information.

11. Contacts, Notices, and Amendments

If you have any concern about privacy at VinUniversity or want to contact one of our data controllers, please contact us and we will try to resolve it. You may also contact us at the address below:

Email: info@vinuni.edu.vn

Tel: +84-2471089779

Our operation changes constantly, and our Privacy Policy may also change. You should check our website frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all personal information we have about you and your account. We will not change our Privacy Policy to make them less protective of personal information collected in the past without letting the relevant customers know and giving them a choice.

12. Additional Information for EU and EEA residents

The following additional information about the privacy, collection, and use of personal information is provided for prospective and current customers of VinUniversity's Services in the European Union and European Economic Area.

- Contact details of Controller of Personal Information. VinUniversity is the controller of the personal information collected or processed under this Privacy Policy.

Email: info@vinuni.edu.vn

Address: VinUniversity Head Office, Vinhomes Ocean Park, Trau Quy Town, Gia Lam District, Ha Noi City, Viet Nam

- Processing. We process your personal information on one or more of the following legal bases:
 - As necessary to enter into a contract with you or a legal entity you represent, to perform our contractual obligations, to provide VinUniversity's Services, to respond to requests from you, or to provide customer support;
 - Where we have a legitimate interest, as described in Section 2 of this Privacy Policy;
 - As necessary to comply with relevant law and legal obligations;
 - Respond to lawful requests and orders; or
 - With your consent.

- Your Rights. Subject to applicable law, you have the right to:
 - Ask whether we hold personal information about you and request copies of such personal information and information about how it is processed;
 - Request that inaccurate personal information be corrected;
 - Request deletion of personal information that is no longer necessary for the purposes underlying the processing, processed based on withdrawn consent, or processed in non-compliance with applicable legal requirements;
 - Request us to restrict the processing of personal information where the processing is inappropriate;
 - Object to the processing of personal data;
 - Request portability of personal information that you have provided to us (which does not include information derived from the collected information), where the processing of such personal information is based on consent or a contract with you and is carried out by automated means; and
 - Lodge a complaint with the supervisory authority if you believe that we violate your privacy rights.

You can exercise your rights of access, rectification, erasure, restriction, objection, and data portability by contacting us. If you wish to do any of these things, please contact us at the address under Section 11 above.

When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time, and we will stop any further processing of your data for that purpose.

- Transfers outside of the EU. When we transfer your personal information collected and stored within the EU to outside the EU, we do so in accordance with the terms of this Privacy Policy and applicable data protection law. This may include the transfer of data pursuant to data transfer agreements that incorporate the Standard Contractual Clauses approved by the EU Commission.

13. **Additional information on California Consumer Privacy Act Notice**

In accordance with the California Consumer Privacy Act ("CCPA"), we provide the information below to inform California residents about our collection, use, and sharing of personal information and explain how California residents may exercise their CCPA rights.

Personal Information We Collect

Please see Section 1 of the Privacy Policy for personal information We collect.

Sources of Personal Information

Please see Section 1 of the Privacy Policy for a list of the sources from which we collect personal information.

Purposes for Which We Use Personal Information

Please see Sections 2 and 3 of the Privacy Policy for a list of the purposes for which we use personal information.

Disclosures and Sales of Personal Information

VinUniversity does not sell consumers personal information in exchange for money. However, under the CCPA’s broad definition of the term “sale,” some of our disclosures of personal information to third parties (e.g., advertising vendors that are allowed to use personal information for their own purposes may qualify as “sales” under the CCPA.

Category of personal information	Categories of third parties to whom VinUniversity discloses this personal information for business purposes
Identifiers	<ul style="list-style-type: none">• Our affiliates and third parties companies and organizations in relation to providing VinUniversity’s Service, completing transactions, supporting our everyday operations, or business management and development• Representatives of California residents• Government agencies• Our affiliates and third parties companies and organizations in relation to human resource activities and workforce management• Our affiliates and third parties companies and organizations in connection with routine or required reporting
Characteristics of protected classifications under California or federal law	
Commercial information	
Biometric information	
Internet or other electronic network activity information	
Geolocation data	
Audio, electronic, visual, or similar information	
Professional or employment-related information	
Inferences drawn from other personal information	

Consumer Rights

Under the CCPA, California residents have the following rights:

- **Right to Know**
 - California residents have the right to request information about our collection, use, and sharing of their personal information, as well as the specific pieces of personal information that we have collected about them.
- **Right to Delete**
 - California residents have the right to request that we delete personal information that we have collected from them
- **Right to Opt Out of Sales**
 - California residents have the right to opt out of the sale of their personal information.
- **Right to Non-Discrimination for Exercise of CCPA Rights**
 - We will not discriminate against California residents as a result of their exercise of any of their rights under the CCPA.

California residents may submit a request to exercise their CCPA rights by:

- Sending us an email to the email address: info@vinuni.edu.vn

If we receive a Right to Know or Right to Delete request from a California resident, we will attempt to verify the request based on information we have about the requestor. However, depending on the information provided by the

requestor and the nature of the request, we may need to request additional information in order to verify the requestor's identity.

California residents have the right to have an authorized agent submit a CCPA request on their behalf. Authorized agents may submit a request to exercise CCPA rights on behalf of a California resident by contacting us at the contact information above.

14. Examples of Information

Information You Give Us

We mainly obtain information about you when you:

- *Search for, subscribe to, or purchase VinUniversity's Services;*
- *Create or use your account;*
- *Provide information, documents to VinUniversity to apply for programs offered by VinUniversity and/or managed by VinUniversity;*
- *Interact with VinUniversity's Services;*
- *Register for or attend a VinUniversity event;*
- *Buy or use products or services from third-party providers through VinUniversity's websites or apps (or other similar platforms provided by us);*
- *Offer your products, or services on or through VinUniversity's Services or our websites or apps (or other similar platform provided by us);*
- *Contact us;*
- *Complete a questionnaire or other information request forms;*
- *Post on VinUniversity's websites or apps or similar venues.*

Depending on your use of VinUniversity's Services, we may obtain from you such information as:

- *Your name, email address, physical address, phone number, and other similar contact information;*
- *Payment information, including credit card and bank account information;*
- *Information about your location;*
- *Your organization and your contacts' information, such as your organization's colleagues or people;*
- *Usernames, aliases, roles, and other authentication and security credential information;*
- *Feedback, testimonials, questions, correspondences with us;*
- *Your image, voice, and other identifiers that are personal to you when you attend an event of VinUniversity or use certain VinUniversity's Services;*

- *Information regarding identity, including government-issued identification information;*
- *Corporate and financial information; and*
- *VAT numbers and other tax identifiers.*
- *Tax codes, social security number and health insurance policy numbers*
- *Information regarding educational background, academic/research/employment, academic transcripts, diplomas, certificates, personal statement, recommendation letters, referees' information, admission offers, and graduate school preference.*
- *Information regarding personal health, financial status, disbursement status, academic result, visa status, academic enrollment status, employment activities, medical insurance, and other significant information (applicable to those who are associated with the scholarship/sponsorship programs managed by VinUniversity)*

Automatic Information

We mainly automatically receive information when you:

- *Interact with, or use VinUniversity's Services (including when you use your computer or other device to interact with VinUniversity's Services);*
- *Download content from us;*
- *Open emails or click on links in emails from us; and*
- *Interact with us.*

Examples of the information automatically collected may include:

- *Information about network and connection, such as the Internet protocol (IP) address;*
- *Information in relation to computer and device information (e.g. device, application, or browser, browser plug-in, operating system);*
- *Your device or computer's whereabouts;*
- *Authentication and security;*
- *Content interaction information (e.g. downloads, and playback details);*
- *VinUni's Services metrics (e.g. products usage, technical errors, reports, settings, backup information, API calls, and other logs);*
- *The content viewed or searched by you, page response times, and page interaction (such as scrolling, clicks);*
- *Email and phone numbers to contact us; and*
- *Identifiers and information contained in cookies.*

Information from Other Sources

Examples of information we receive from other sources include:

- *Information on marketing, sales and recruitment (e.g. your name, email, physical address, phone number, and other similar information);*
- *Information about your interactions with VinUniversity's Services or third parties' products in relation to VinUniversity's Services (e.g. subscription, purchase, support, or other);*
- *Search results and links, including paid listings (such as Sponsored Links); and*
- *Credit history information.*
- *Information regarding potential candidates shared or recommended by a third party*