



PXP Vietnam Asset Management Limited Privacy Policy

PXP Vietnam Asset Management Limited (**PXP**) is strongly committed to protecting your privacy. This privacy policy (the “**Privacy Policy**”) provides what information PXP may collect, how it is used and your legal rights.

Information PXP may collect

PXP may collect and process information about you and your personnel through various means, including:

- Via our website (e.g. on our “*Contact*” page or “*Join our Distribution List*”, or by submitting a job application etc.);
- By email or other electronic correspondence;
- By telephone;
- Through our networking.

The personal data you may provide to PXP may include:

- Your name and position;
- Contact information, including telephone number, postal address and email address;
- Company name and address;
- Type of investors, business sector you are in, your regional interest in terms of financial markets and whether you hold shares in PXP’s current funds;
- Employment and job application details, e.g. date of birth, employment history, qualifications;
- Photographic identification and video footage;
- The content of any enquiry submitted over our website or through email.

PXP may automatically collect the following information when you visit PXP’s website or when you receive an email from PXP:

- Web usage information (e.g IP address, country stats, hits, exclusions, your login information, browser type and version, time zone setting, operating system and platform);
- Information about your visit, including Uniform Resource Locators (URLs) clickstream to, through and from PXP’s website (including date and time), time on page, page response times, downloads errors;
- Location, bounce rates, device, language, and demographic information (if provided by you), through Google Analytics;

- PXP's platform for its emails allows PXP to monitor your engagement activity (e.g. whether you access a link or document, open an email from PXP, forward or print an email, the time and date, your location and operating system and platform).

PXP does not use cookies.

How PXP uses your information

PXP may use your information for the following purposes:

- To respond to any query that you may submit to PXP;
- To manage our relationship with you such as maintaining our database of contacts and third parties;
- To complete our contractual obligations to you;
- To carry out any relevant conflict checks, anti-money laundering and sanctions checks and fulfilling our obligations under any relevant anti-money laundering laws or regulations (including under the Anti-Money Laundering Regulations of 2017 of the Cayman Islands, the Proceeds of Criminal Conduct Act of the British Virgin Islands, the Anti-Money Laundering Regulations of the British Virgin Islands and their respective guidance notes or implementing regulations);
- To send you any relevant information that may be of interest to you using the email and/or postal address which you have provided;
- To improve and optimize our website;
- To process any job application you have submitted;
- To administer our website and for internal operations, including troubleshooting, data analysis, testing and research; and
- To comply with any other professional, legal and regulatory obligations which apply to PXP.

Sharing your information

PXP may share your details with carefully selected third parties which are instructed by PXP on behalf of the funds it manages to enable PXP to fulfill its contractual obligations to you and PXP's contacts in the course of business.

PXP may disclose your information to third parties when:

- You specifically request this or it is necessary for you to provide the information in relation to the performance of our services;
- In the event that PXP sells or buys any business or assets, in which case PXP may disclose your personal data to the prospective seller or buyer of such business or assets; or
- If PXP's website or substantially all of PXP's assets are acquired by a third party, in which case personal data held by PXP about its contacts will be one of the transferred assets.

The third parties include:

- Our bank (including as permitted by the relevant money laundering or terrorist financing regulations which, for the purposes of preventing money laundering or terrorist financing, may require PXP to disclose your personal data on request to PXP's bank from time to time);

- Our insurers;
- Our auditors;
- Other professional advisors or third parties service providers such as administrators, custodians or lawyers;
- PXP and the funds' regulators, such as the Financial Services Commission of the British Virgin Islands, the Cayman Islands Monetary Agency, the State Securities Commission of Vietnam and any other relevant regulator;
- PXP's data processors providing security, email security, data governance, archiving and other IT and business support services;
- PXP's email marketing platform provider and our website platform provider;
- Analytics and search engine providers that assist us in the improvement and optimization of our website.

PXP will not rent or sell its users or other contacts details to any organization or individual.

Storage and retention of your personal data

PXP recognizes that your information is important to you and PXP has taken appropriate measures to protect your information while it is in PXP's care. PXP has implemented appropriate technical and organizational security measures in order to protect your information from unauthorized or unlawful disclosure, loss, misuse, alteration to such information. Unfortunately, the transmission of information via the internet is not completely secure and although PXP does its best to protect your personal data, PXP cannot absolutely guarantee the security of your data.

PXP will keep your information stored on PXP's systems for as long as it takes to provide the services to you. PXP is also required to retain your information to comply with its legal and regulatory obligations.

PXP will, subject to legal requirements, not store your information for longer than is reasonably necessary or required by law.

Withdrawal of Consent

Where PXP processes your personal data PXP does so on the basis that you have provided your consent to PXP to do so for the purposes set out in this Policy when you submitted your personal data to PXP. You may withdraw your consent to this processing at any time by unsubscribing from our mailing list or by contacting us at dataprotection@pxpvietnam.com or info@pxpvietnam.com.

In certain cases, PXP may continue to process your information after you have withdrawn that consent if PXP has a legal basis to do so or if your withdrawal of consent was limited to certain processing activities.

Your Information Rights

The European Data Protection Legislation gives you certain rights in relation to the personal information that PXP holds about you and you can exercise those rights by contacting PXP at dataprotection@pxpvietnam.com or info@pxpvietnam.com

These rights include:

- Obtaining information regarding the processing of your personal information and access to the personal information which PXP holds about you;
- Requesting that PXP corrects your personal information if it is inaccurate or incomplete;
- Requesting that PXP erase your personal information in certain circumstances. Please note that there may be circumstances where PXP is legally entitled to retain such information;
- Objecting to, and requesting that we restrict, PXP's processing of your personal information in certain circumstances;
- Lodging a complaint with the relevant data protection authority, if you think your rights have been infringed by PXP.

Changes to PXP's Privacy Policy

The content of this Privacy Policy may be updated from time to time by PXP to reflect any changes in the way in which we process your personal data or to reflect legal requirements as these may change. The updated Privacy Policy will be posted on our website and changes will take effect as soon as the revised version is made available on our website.

PXP Contact Information

Questions, comments and requests regarding this Privacy Policy should be addressed to dataprotection@pxpvietnam.com