

# 20260526\_PrivacyPolicyVietnam\_v2.0

## Privacy Policy — Hubexo Vietnam Company Limited

Version 2.0 — effective 26 May 2026

This Policy explains how Hubexo Vietnam Company Limited ("Hubexo Vietnam", "we") handles personal data in Vietnam. It is issued under the **Law on Personal Data Protection 2025 (Law No. 91/2025/QH15) ("PDPL")** and **Decree No. 356/2025/ND-CP ("Decree 356")**, read together with **Decree No. 91/2020/ND-CP** on combating spam, the **Law on Cyber Security 2018** and **Decree No. 53/2022/ND-CP**.

Hubexo Vietnam provides B2B subscription services to the construction industry. For most processing on our subscription platforms we act as a **personal-data processor** (Bên Xử lý dữ liệu cá nhân) on behalf of the Hubexo group and our customers, who are the controllers. For the operation of our marketing website, recruitment, direct correspondence with prospects and customers, the project-database, and the internal management of our staff, we act as a **personal-data controller** (Bên Kiểm soát dữ liệu cá nhân).

We may update this Policy from time to time. The current version is always available on our website.

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### 1. Personal data we process

Depending on your interaction with us, we may process:

- **Customer and prospect data** — name, business contact details, billing information, and any information you provide to us through enquiries, support tickets or feedback.
- **User account and platform-interaction data** — login records, device and browser information, IP address, approximate (city/region-level) location inferred from IP address, in-platform interaction events (page views, clicks, watchlist actions), session recordings, and information you enter into the platform (notes, tasks, custom fields, project records).
- **Recruitment data** — CV, employment history and any other information you provide as part of a job application.
- **Project-database data** — name, business contact details and role of persons connected with construction projects (project owners, developers, builders, architects, planners, consultants, suppliers), collected from publicly accessible sources including the **Vietnam National Public Procurement Network**, the **National Business Registration Portal**, official construction-permit notifications, the **Vietnam Public Procurement Review (Báo Đấu thầu)** and other publicly accessible registers.

### Sensitive personal data under Decree 356

Decree 356 classifies certain categories of personal data as **sensitive personal data (dữ liệu cá nhân nhạy cảm)**, including data reflecting an individual's activities and history of activities in cyberspace. Some of the platform-interaction data described above (including in-platform interaction events and session recordings) may fall within that classification. Where it does, we process it in accordance with the elevated requirements of the PDPL and Decree 356.

We do not knowingly collect data revealing health, biometric identifiers, financial-account credentials or bank-card details, images of identification documents, criminal-record data, precise geolocation, racial or ethnic origin, political or religious views, or sexual life or orientation through our services.

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## 2. Lawful bases (PDPL Article 19)

We process personal data on the following PDPL-recognised grounds:

- **Consent** of the data subject — for processing of sensitive personal data, for advertising and marketing communications, and for any other processing for which the PDPL or Decree 356 require consent.
- **Performance of a contract** with the data subject, or steps taken at the data subject's request prior to entering into a contract — for delivering our subscription services, managing customer and prospect relationships, and operating user accounts.
- **Compliance with a legal obligation** of the controller — for tax, accounting, employment, anti-money-laundering and lawful disclosures to authorities.
- **Processing of personal data that has been lawfully made publicly available** by, or with the consent of, the data subject — for the project-database records collected from public registers identified in Section 1.
- **Protection of life, health or other vital interests** of the data subject or another natural person in an emergency.
- **Protection of the legitimate rights or interests of the controller or another party against an act of infringement** (PDPL Article 19.1(a)) — used narrowly for the prevention and investigation of fraud, abuse or misuse of our services, and for the establishment, exercise or defence of legal claims.

Where the lawful basis is consent, you may withdraw it at any time by contacting us at the address in Section 7. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

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## 3. Purposes of processing

We use personal data to:

- provide our subscription products and services and manage customer accounts;
- operate our marketing website and respond to enquiries;
- send advertising and marketing communications to recipients who have given express prior consent under Decree 91/2020;
- process job applications;
- maintain and make available the project-database content to subscribed customers;
- operate, support, secure, troubleshoot and improve our platforms, including through product analytics and session recordings (which, where they involve sensitive personal data, are conducted on the basis of consent);
- meet our legal, accounting, tax and reporting obligations under Vietnamese law; and
- prevent and investigate fraud, abuse, misuse of our services and breaches of our terms, and establish, exercise or defend legal claims.

## Children

Our services are B2B and are not directed to children. We do not knowingly collect personal data of children. Where the PDPL requires the consent of a parent or legal representative for the processing of a child's personal data, we process such data only in accordance with the PDPL.

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## 4. Recipients of personal data

We may disclose personal data to:

- **other companies in the Hubexo group** (located in Sweden, the United Kingdom, Australia, New Zealand, Thailand, Malaysia, Singapore, the Philippines, Indonesia, Hong Kong and other countries in which the group operates);
- **service providers** acting on our behalf, by functional category: technology-hosting and infrastructure, product-analytics and error-tracking, marketing-platform, payment-processing, customer-support, and professional advisers;
- **other registered users from your organisation**, in accordance with your subscription configuration;
- **customers of Hubexo** who subscribe to our project-database products, in accordance with the terms of those products;
- **recipients in the recruitment process**, such as referees and payroll providers, where you have applied for a role;
- **competent authorities**, where required, authorised or permitted by Vietnamese law, including the **Specialised Authority for Personal Data Protection (Cơ quan chuyên trách bảo vệ dữ liệu cá nhân)** within the **Ministry of Public Security (Bộ Công an)** and other authorities designated under the PDPL; and
- **anyone else you authorise us to disclose information to.**

## Cross-border transfers

Some of the recipients listed above are located outside Vietnam. Where we transfer personal data outside Vietnam, we do so under a **written transfer agreement** with the recipient containing the content required by Decree 356, and we prepare and file a **Transfer Impact Assessment (TIA) dossier** with the Specialised Authority for Personal Data Protection within **60 days** of the first transfer, as required by the PDPL and Decree 356. The dossier is updated and re-filed in the circumstances and at the intervals prescribed by Decree 356.

## Data localisation

The Law on Cyber Security 2018 and Decree 53/2022/ND-CP require certain providers to store specified data in Vietnam where defined conditions are met. We have assessed our services against that regime and comply with any storage-in-Vietnam requirement that applies to us.

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## 5. Security and retention

We apply technical and organisational measures appropriate to the risk to protect personal data, in accordance with Decree 356.

We retain personal data for as long as is necessary for the purposes set out in this Policy and to comply with our legal obligations under Vietnamese law. When we no longer require personal data, we destroy or de-identify it.

### Personal-data breach notification

If we become aware of a personal-data breach we will notify the Specialised Authority for Personal Data Protection **within 72 hours of detection**, and notify affected data subjects where required, in accordance with the PDPL and Decree 356.

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## 6. Your rights

Subject to the conditions and exceptions in the PDPL and Decree 356, you have the right to:

- be informed about the processing of your personal data;
- give, refuse or withdraw your consent at any time;
- access your personal data;
- request rectification of personal data that is incomplete or inaccurate;
- request deletion of your personal data in the circumstances set out in the PDPL;
- request restriction of processing;

- object to processing of your personal data, including specifically for advertising and marketing purposes;
- data portability where applicable;
- be notified about transfers of personal data abroad; and
- lodge a complaint, claim damages and bring proceedings in respect of breaches of personal-data-protection rules.

## Response timeframes (Decree 356)

We will acknowledge a request within **2 working days** of receipt and, in accordance with Decree 356, complete:

- **access and rectification** requests within **10 days**;
- **consent-withdrawal** requests within **15 days**;
- **deletion** requests within **20 days**.

Where permitted by Decree 356, the response period may be extended once by up to a further 15 days, with notice to the requester.

To exercise any of these rights, please contact us using the channels in Section 7. Every marketing communication we send also contains a functional opt-out mechanism in accordance with Decree 91/2020.

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## 7. Enquiries and complaints

For any privacy enquiry, request to exercise a right under the PDPL or complaint, please contact us:

- **Postal:** Hubexo Vietnam Company Limited, Viettel Tower, Block A1, 13th Floor, 285 Cach Mang Thang Tam Street, Hoa Hung Ward, Ho Chi Minh City, Vietnam
- **Email:** [contact.vn@hubexo.com](mailto:contact.vn@hubexo.com)

If your complaint cannot be resolved to your satisfaction, you may lodge a complaint with the **Specialised Authority for Personal Data Protection (Cơ quan chuyên trách bảo vệ dữ liệu cá nhân)** within the **Ministry of Public Security (Bộ Công an)**.

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## 8. Data Protection Department

The Hubexo Vietnam **Data Protection Officer** is Jenny Tadeo, contactable at [jenny.tadeo@hubexo.com](mailto:jenny.tadeo@hubexo.com).