

PRIVACY POLICY

1. Introduction

VIETSIN COMMERCIAL COMPLEX DEVELOPMENT JOINT STOCK COMPANY (hereinafter referred as to “**we**”, “**our**” or “**us**”) owns and operates SC VivoCity Shopping Mall. We respect individual privacy and are committed to protecting personal data in accordance with relevant applicable laws and regulations of Vietnam.

This Privacy Policy explains how we collect, use, disclose, store, transfer and otherwise process personal data of customers, visitors, users of our website, mobile applications and platforms, event participants, vendors, contractors, agents, candidates, and other individuals who contract with us and/or interact with us, SC Vivo City Shopping Mall, our website (scvivocity.com.vn), mobile applications (such as the SC VivoCity App), official social media channels (such as Facebook, Instagrams, Tiktok, etc), customer service counters, campaigns, events, workshops, promotions and other customer-facing platforms.

By providing Personal Data to us, visiting our premises or using our services or platforms, you acknowledge that you have read and understood this Privacy Policy.

2. Definitions

“**Personal Data**” refers to digital data or information in other forms, such as symbols, letters, numbers, images, sounds, or similar types that identifies or assists the identification of a specific individual. The personal data includes basic personal data and sensitive personal data as set out in applicable laws.

“**process**” or “**processing**” refers to one or more activities affecting Personal Data, including collection, analysis, synthesis, encryption, decryption, modification deletion, destruction, de-identification, provision, disclosure, transfer and other activities affecting Personal Data.

“**SC VivoCity Shopping Mall**” means the shopping mall complex located at 1058 Nguyen Van Linh Street, Tan Hung Ward, Ho Chi Minh City, Vietnam, together with all associated common areas, facilities, and amenities forming part of such complex.

3. Collection of Personal Data

We collect your Personal Data that is only necessary and appropriate for the purposes described in this Privacy Policy. Depending on your interaction with us, the Personal Data we collect may include:

- a) Identity information, such as name, date of birth, gender, nationality, occupation, personal identification number and/or passport information;
- b) Contact information, such as telephone number, email address, and mailing address;
- c) Images, audio and video data, including CCTV footage, event photographs or videos and other recordings collected at SC VivoCity Shopping Mall or during our events;
- d) Vehicle and parking-related information, such as vehicle licence plate number and parking or access records; and

- e) Payment related information, such as bank account details, only where necessary for payment, reimbursement, refund, prize delivery or other transaction handling.

Some of the Personal Data that we collect may be sensitive in nature, but we collect sensitive personal data only with your consent, where necessary and in compliance with applicable laws.

You are responsible for ensuring that Personal Data provided to us is current, accurate, complete and up to date, otherwise we may be unable to provide you with the products and/or services you have requested, or performing transactions with you. If you believe such Personal Data is incorrect or incomplete, please inform us of relevant changes.

4. Methods of Collection

We may collect your Personal Data from the following sources:

- a) When you directly provide to us at our office, visit our customer service counter, contact us, or communicate with us via telephone, letter, email, online portal, face-to-face correspondence, etc.;
- b) When you provide feedback or submit forms, enquiries, complaints, requests, whether in physical or online formats;
- c) When you visit, use, download, register, sign up, access, or conduct any other interaction with our website, mobile applications or social media channels;
- d) When you sign up for our loyalty or other programs, create an account with us or subscribe to our mailing lists.
- e) When you respond to our promotions, surveys or other initiatives;
- f) When you attend the events, programs or functions organized by us or being conducted at our premises;
- g) When you collaborate, partner, or transact under any forms with us;
- h) When you submit an employment, internship or secondment application to us;
- i) Data obtained from our CCTV security systems, parking systems, and event recordings, within our premises;
- j) Data obtained from third parties where you have authorized such disclosure, or where collection is required or permitted by applicable laws;
- k) Data collected from any publicly available sources or competent authorities; and
- l) When you provide Personal Data to us for any other reason.

5. Purposes

We may process your Personal Data for one or more of the following purposes:

- a) To provide the products and services to you, and any other SC VivoCity Shopping Mall-related services, including parking, security, safety, lost-and-found, incident response, emergency assistance and visitor management;

- b) To operate SC VivoCity Shopping Mall, ensure security and safety, manage customer service channels, facilitate events, promotions, campaigns, lucky draws, membership activities and prize redemption;
- c) To receive, process and respond to your feedback, enquiries, complaints, requests and other customer support matters;
- d) To verify your identity and/or your related persons (including without limitation, spouse, parents, children, shareholders, board members, directors, representatives, agents, etc), conduct due diligence check, manage our relationship with you and communicate with you;
- e) To verify eligibility or participation where required for services, promotions, prize fulfilment, refunds, reimbursement or legal compliance;
- f) To deliver service information, event updates, promotional materials, marketing communications, and other information, where permitted by law and subject to applicable consent or opt-out requirements;
- g) To perform our agreement with you, including any transaction contemplated thereof, and preparing documentation as may be required to carry out such agreement;
- h) To conduct market research, planning, marketing, customer surveys; to analyse website traffic, platform usage, customer journeys, business performance, service quality and/or other related forms of data analytics, in order to improve customer experience, and products and services provided by us to you;
- i) To facilitate the set-up, operation, maintenance and/or administration of any account opened by or in your name with us, and provide related services and support (including for billing purposes or to process orders and applications for such services);
- j) To maintain, test and operate any system or platform required for the provision of any of our services, or in connection with our website or mobile applications to be furnished by us or any third-party service provider designated by us;
- k) To conduct investigations or take action in relation to crime and fraud prevention, detection or prosecution, risk management, violation of terms and conditions for services provided by us or prevent any individual from harm, illegal or unlawful activities;
- l) To seek professional advice, such as finance, tax and legal advice; and to defend our rights and benefits and/or any of our related entities, partners, contractors or third-party service providers;
- m) To implement corporate governance, administrative management, internal/external audits, internal control and compliance, corporate restructuring and for any other business operation and legitimate purposes;
- n) To comply with regulatory requirements and legal obligations, and any requests from competent authorities; and
- o) For any other purposes notified to you at the time of collection, or otherwise permitted by applicable laws, or related to the aforesaid purposes.

We will only process your Personal Data for the purposes as set out above. We will not sell or lease your Personal Data to any third party for commercial purposes without your consent.

6. Consent

We process your Personal Data based on one or more lawful grounds, including your consent. Where consent is required by applicable laws, we will obtain your consent in a clear, voluntary and informed manner before processing Personal Data.

We may process your Personal Data without your consent in cases permitted by applicable law, such as for:

- a) Emergency situations to protect life or health;
- b) Public security or order;
- c) Disclosure as required by laws;
- d) Processing activities by competent authorities;
- e) Performance of legal obligations; or
- f) Other statutory grounds.

If you provide to us Personal Data of another individual, such as an emergency contacts, family members, children, friends, companions, agents or representatives, you represent and undertake the responsibility to ensure that it is lawful for you to do so and, where required, have obtained that individual's consent for your provision of their Personal Data to us, as well as further processing of that Personal Data by us for the purposes set out in this Privacy Policy.

You have the right to withdraw consent at any time by notifying us in writing according to the details in [Section 12_Contact Information](#) below. Please note that should you decide the withdrawal, this will not affect the lawfulness of our processing of Personal Data based on your consent before your withdrawal, and subject to limitations under applicable laws, we may not be able to continue to transact with you, nor to provide our products or services to you.

7. Disclosure of Personal Data

We may disclose your Personal Data, where necessary and lawful, to the following recipients:

- a) Our affiliated entities, shareholders, branches, subsidiaries, divisions, successor of the business, for the processing purposes outlines in this Privacy Policy;
- b) Our contractors, vendors, banks, or third-party service providers engaged to provide support to our corporate organization and administration, and business operation, including without limitation, IT, human resource, security, analytic, marketing, payment, delivery, operational management of SC VivoCity Shopping Mall and its websites, mobile applications, platforms and systems;
- c) Our professional advisers, including lawyers, auditors, accountants and insurers;
- d) Our business partners, tenants, event partners or promotion partners, where necessary for the relevant activities;

- e) Competent authorities, regulators, government bodies, courts, arbitration centers and arbitrators, law enforcement agencies, where required or permitted by law; and
- f) Any other parties authorized by you or otherwise permitted by applicable laws.

8. Transfer of Personal Data

During the course of our business and operation, we may disclose, transfer, store, process and/or deal with your Personal Data outside of Vietnam, where we procure and use products and services provided by offshore service providers. In the even of transferring Personal Data across geographical borders, we will take reasonable steps to ensure your Personal Data transferred outside of Vietnam is adequately protected, in compliance with requirements of applicable laws on personal data protection.

9. Retention of Personal Data

We retain your Personal Data for the period as long as necessary to fulfill the purposes for which it was collected as stated in this Privacy Policy, for our legal and business purposes, or to the extent required or permitted by applicable laws. For instance, retention periods may depend on the nature of the data, processing purposes, performance of requested services or contractual arrangements, compliance with legal obligations, audit requirements, tax and accounting requirements, security needs, dispute resolution, investigation, defense or enforcement of lawful rights and interests. When your Personal Data is no longer required for the aforementioned purposes, we may securely delete and/or destroy it in accordance with applicable laws and our internal policies.

10. Rights of Data Subjects

Subject to applicable laws, you may have the following rights in relation to your Personal Data:

- a) Right to know about Personal Data processing activities;
- b) Right to consent, refuse consent, or withdraw consent for Personal Data processing, except where processing without consent is permitted by applicable laws;
- c) Right to view, revise or request correction of Personal Data;
- d) Right to request provision, deletion, restriction of Personal Data processing;
- e) Right to object Personal Data processing;
- f) Right to file complaints, denunciations, lawsuits, damage compensation claims in accordance with applicable laws; and
- g) Right to request competent authorities, or relevant bodies, organizations, individuals relating to Personal Data processing to implement personal data protection measures and methods in accordance with applicable laws.

You can exercise your rights by contacting us. We will make reasonable efforts to attend and address your valid request, within the statutory timeline applicable to the relevant right. We may request additional information to verify your identity and fulfill your request. We may refuse or limitedly address your request to the extent permitted by applicable laws, in such case, we will contact you and explain the reason why your request was denied or not fully accepted.

11. Personal Data Security and Potential Risks

We apply appropriate management, technical and organizational measures to protect the confidentiality of your Personal Data and against unauthorized access, disclosure, loss, misuse, alteration, destruction or other unlawful processing.

However, despite of our efforts in securing and protecting your Personal data, we cannot guarantee that your Personal Data shall not be leaked or stolen during our processing by any parties who we do not authorize or disclose to. Potential risks may include technical errors, system vulnerabilities, unauthorized access, cyberattacks, accidental disclosure, service provider incidents or other events beyond our reasonable control.

In the event of data breach, we will assess the incident, notify you and/or affected data subjects, take appropriate remedial measures, and comply with all reporting requirements by the competent authorities, in accordance with the timelines, procedures and requirements prescribed by applicable laws.

To the maximum extent permitted by applicable laws, we shall not be liable to you for any loss or damage you suffer as a result of viruses or other malicious or harmful content that you access from or via our website, mobile applications, platforms and systems, nor shall we be liable for any loss and damages incurred by you from the disruption, failures or problems relating to the internet connection, hardware devices, servers or any relevant security issues arisen during your download, and/or use of our website and mobile applications, platforms and systems.

12. Contact Information

If you wish to exercise your rights or have any inquiry in relation to this Privacy Policy or the processing of Personal Data, please contact us at:

Vietsin Commercial Complex Development Joint Stock Company (VCCD)
Address: 1058 Nguyen Van Linh Street, Tan Hung Ward, Ho Chi Minh City, Vietnam
Email: VN-PDPD@scvivocity.com.vn
Website: <https://scvivocity.com.vn>

13. Governing Law and Jurisdiction

This Privacy Policy shall be governed and construed in accordance with the laws of Vietnam.

Any disputes arising out of, in respect of, or connection with this Privacy Policy shall be settled by the competent courts of Vietnam.

14. Policy Update

We may amend this Privacy Policy from time to time to reflect changes in law, business operations or personal data protection practices, without any prior notice.

Any changes or updates to this Privacy Policy will be published and made available on scvivocity.com.vn, and/or communicated through appropriate channels.

This Privacy Policy was last updated on 07 Oct 2026 and takes effect immediately.