

This document is an English translation of an original document in Japanese. If there is any discrepancy between this translation and the original document, the latter shall prevail.

Privacy Policy (Vietnam)

Recognizing the importance of protecting Personal Data, Safie Inc. (hereinafter referred to as “we/us/our”) complies with applicable data protection laws and regulations and is committed to properly handling and protecting Personal Data in accordance with our privacy policy (hereinafter referred to as the “**Privacy Policy**”) as described below.

You may be subject to specific policies provided by us and policies in the Socialist Republic of Vietnam in conjunction with this Privacy Policy. These specific policies shall supersede this Privacy Policy to the extent that the clauses set forth in these policies contradict the clauses set forth in this Privacy Policy.

Please also refer to “[Safie Data Charter](#)”, which outlines our philosophy and social responsibility regarding our data handling. The Data Charter covers not only the Personal Data defined in this Privacy Policy but also all types of data handled on the platform we provide.

Unless otherwise specified in this Privacy Policy, the terms used in this Privacy Policy have the same meaning as in our Terms of Service.

Article 1. Type of Personal Data Processed by Safie Inc.

Personal Data means information in the form of symbols, letters, numbers, images, sounds or the like on an electronic medium that is associated with a particular person or helps to identify singularity. Personal data includes General Personal Data and Sensitive Personal Data as listed in Appendix 1 and Appendix 2 of this Privacy Policy, in which, we will process the followings:

- (i) Personal Data listed in Appendix "Appendix 1.General Personal Data"
- (ii) Personal Data listed in Appendix "Appendix 2.Sensitive Personal Data"

Article 2. Purposes of Use of Personal Data

1. Purposes

We use the following types of Personal Data collected directly from you for the respective purposes described below:

a. Customer’s Personal Data:

- (i) To provide our services. This includes the verification of your identity through face recognition by comparing the face image you previously recorded on the server and the face image recognized by the application provided by us;
- (ii) To address your inquiries related to our services and other pertinent matters. Depending on the nature of inquiry, and upon securing your consent to

provide the information with a third party pursuant to Paragraph 8, we may direct your inquiry to relevant hardware manufacturers for a response;

- (iii) To inform you of our products and services;
- (iv) To deal with violations of our terms of services, policies, and agreements with you (hereinafter referred to as “**terms of services and related agreements**”) concerning our services;
- (v) To notify you of changes to the terms of services and related agreements;
- (vi) To improve our services and to help developing new services;
- (vii) To create statistic data in aggregate or other de-identified form in relation to our services;
- (viii) To provide Personal Data with advertising distributors for the purpose of distributing advertisement, analyzing what types of advertisement, information, or services are most optimal and effective to display, and providing the result of this analysis with advertisers, information providers, and service providers in relation to our services;
- (ix) To use for other purposes associated with the above purposes.

b. Personal Data Submitted during Job Application or Inquiry Processes

- (i) To provide information about job openings and to address your inquiries related to these job opportunities;
- (ii) To conduct recruiting activities (such as notification of acceptance/rejection results and job interviews).

2. Changes to the Purpose of Use of Your Personal Data

We may make changes to the purpose of use of your Personal Data within the scope, which is reasonably deemed pertinent to the original purpose, and if we make such changes, we will notify you of or publish such changes.

3. Restrictions on the Use of Your Personal Data

We will not handle your Personal Data beyond the scope necessary to achieve the purpose of use without your consent, except where permitted by applicable laws and regulations, including the following cases:

- a. When it is necessary to protect life or body of a person, and it is difficult to obtain your consent
- b. When it is based on law and regulation
- c. When competent authorities process of personal data in the following cases:

- (i) When a state of emergency is declared in relation to significant disasters, deadly epidemics, national defense, security, or social order and safety
- (ii) When security and national defense are threatened, but not to the point where a state of emergency is declared
- (iii) When competent authorities use their authority according to the provisions of law to prevent and fight riots and terrorism, crimes and law violations

Article 3. Handling of the Personal Data

1. Appropriate Collection of Your Personal Data

We collect your Personal Data in an appropriate manner and will not collect any Personal Data by any fraudulent or inappropriate means.

2. Personal Data Processing

Personal Data processing includes one or many activities affecting to Personal Data such as collecting, recording, analyzing, confirming, storing, editing, publishing, combining, accessing, retrieving, withdrawing, encrypting, decoding, copying, sharing, transmitting, providing, transferring, deleting, destroying Personal Data; relevant activities or any activity prescribed by law at the processing time of Personal Data.

The processing of Personal Data may take place at any time during the validity of the Service Agreement, including the automatic processing of Personal Data and the transfer of Personal Data to our servers in Japan.

3. Video Data

For the handling of video data recorded by a camera or other device provided by us, please refer to the purpose of use that are either notified to you or published by our customer using our services. We aim to achieve data governance in cooperation with our customers and other parties in accordance with “Safie Data Charter” to protect the privacy of individuals captured in video footages.

We may use video data for improving our services and developing new services, including through the development of Artificial Intelligence. However, we will only use Personal Data contained in video data to the extent permitted by the Terms of Services and related agreements, and unless permitted by this Privacy Policy or the Terms of Services and related agreements, we will not disclose any video data to third parties in a way that can identify any specific individual.

Article 4. Other Organizations and Individuals related to Processing of Personal Data

- 1. Individuals, agencies and organizations to whom we must provide information in accordance with legal obligations, or regulations of law, or at the request of management agencies, functional agencies to serve the Purposes mentioned in Article 2 of this Privacy Policy.

2. We may provide your Personal Data to advertising distributors and equivalent entities outside Japan, including but not limited to, Meta Platform, Inc. (Facebook) and Google LLC, for the Purposes in Article 2.1(a)(viii). Please refer to the websites described below for details. If you do not wish to store your web browsing history, please change the settings to opt out.
 - [Meta Platforms, Inc.\(Facebook\)](#)
 - [Google LLC](#)
3. Outside Service Provider that the Services may be associated with as provided in the Terms of Service.
4. Unless otherwise provided in this Privacy Policy, we will not provide any third party with your Personal Data without your prior consent, except as permitted by applicable laws and regulations.

Article 5. Unwanted Consequences

1. You acknowledge that the potential consequences and damages (for the purposes of this Article, hereinafter referred to as the "**Risks**") related to handling Personal Data may change from time to time. We hereby list out potential Risks to the Personal Data, and they may be updated from time to time:
 - (i) Data leak;
 - (ii) Inappropriate data processing which may affect some of your legitimate rights and interests.
2. Notwithstanding the abovementioned, we undertake to process Personal Data safely and securely, ensuring all your legitimate rights in accordance with the law. We implement necessary and appropriate supervision over our employees to ensure that your Personal Data is securely managed and safeguarded against risks such as loss, destruction, alteration, and leakage. If we outsource all or part of the handling of Personal Data, we implement necessary and appropriate supervision over the third-party service provider to ensure the secure management of your Personal Data.

Article 6. Retention Period of Your Personal Data

Unless otherwise provided by law, we set a retention period of your Personal Data within the scope necessary for the Purpose as mentioned in Article 2 (The facial images collected when verifying your identity through facial recognition by comparing the facial image you have previously recorded on our server with the facial image recognized by our application will be retained for a period of six (6) months. The retention period for other Personal Data will be determined as required), and we will delete your Personal Data without delay upon the expiration of the retention period or upon achievement of such purposes of use.

Article 7. Your Rights

You have certain rights relating to your Personal Data, subject to Vietnamese data protection regulations including the right to request disclosure of your Personal Data, the right to correct, amend, or delete your Personal Data, the right to cease using your Personal Data or to cease transferring your Personal Data to third parties, and other rights as provided by laws.

Please note that we may charge applicable fees for the disclosure of personal information.

Article 8. Your Obligations

You have certain obligations relating to your Personal Data, subject to Vietnamese data protection regulations including the obligation to protect your own Personal Data, to request relevant organizations and individuals to protect your own Personal Data, to respect and protect others' Personal Data, to fully and accurately provide your Personal Data when you consents to the processing, to comply with regulations of law on protection of Personal Data and prevent violations against regulations on protection of Personal Data, and other obligations as provided by laws.

Article 9. Use of Cookies and Other Similar Technologies

We use cookies and other similar technologies for providing our services, and as a result, some of your information, including your IP address, may be collected by other companies (e.g. Google LLC). Please refer to our “Cookie Policy” for details.

Article 10. Inquiries

For any request including disclosure request, comment, question, complaint, or any other inquiry concerning the handling of your Personal Data, please contact the following contact desk.

Safie Inc.

Email: support@safie.jp

Our support team is available from 10:00 a.m. to 5:00 p.m., Japan Time, on regular business days, excluding holidays. Note that support is only available in Japanese and English).

Article 11. Continuous Improvement

We are committed to regularly reviewing how we handle Personal Data and to making continuous improvements, and may update this Privacy Policy as necessary.

Appendix 1

General Personal Data

General personal data includes:

- a) Last name, middle name and first name, other names (if any);
- b) Date of birth; date of death or going missing;
- c) Gender;
- d) Place of birth, registered place of birth; place of permanent residence; place of temporary residence; current place of residence; hometown; contact address;
- e) Nationality;
- f) Personal image;
- g) Phone number; ID Card number, personal identification number, passport number, driver's license number, license plate, taxpayer identification number, social security number and health insurance card number;
- h) Marital status;
- i) Information about the individual's family relationship (parents, children);
- j) Digital account information; personal data that reflects activities and activity history in cyberspace.

Appendix 2

Sensitive Personal Data

Sensitive personal data includes:

- a) Political and religious opinions;
- b) Health condition and personal information stated in health record, excluding information on blood group;
- c) Information about racial or ethnic origin;
- d) Information about genetic data related to an individual's inherited or acquired genetic characteristics;
- e) Information about an individual's own biometric or biological characteristics;
- f) Information about an individual's sex life or sexual orientation.
- g) Data on crimes and criminal activities collected and stored by law enforcement agencies;
- h) Information on customers of credit institutions, foreign bank branches, payment service providers and other licensed institutions, including: customer identification as prescribed by law, accounts, deposits, deposited assets, transactions, organizations and individuals that are guarantors at credit institutions, bank branches, and payment service providers;
- i) Personal location identified via location services.

【Effective Date: January 1, 2024】