

Privacy Notice – Vietnam

Introduction

This Notice applies to JPMorgan Chase Bank, N.A.– Ho Chi Minh Branch and JPMorgan Chase Bank N.A.– Hanoi Representative Office or any of its affiliates (or affiliates of JPMorgan Chase & Co.) located in Vietnam (together, “**J.P.Morgan**”, “**we**” or “**us**”).

Your privacy is important to us. This Online Privacy Policy explains what and how we collect, share, use, and protect your personal information when you visit or use this and other online services offered by the JPMorgan Chase & Co. family of companies (“J.P. Morgan”) that link to or reference this Policy (collectively, our “online services”).

Privacy Principles

- **Requirement to provide your personal information**

From time to time, we may request for you to supply J.P. Morgan with your personal information in connection with the purposes listed below. If you fail to provide such personal information, we may be unable to provide you with our services (or any part thereof), including opening an account, or comply with any applicable laws or regulations or guidelines and codes issued by regulatory or other authorities.

- **We work hard to protect your information.**

We take our responsibility to protect the privacy and confidentiality of your information, including personal information, very seriously. We maintain physical, electronic and procedural safeguards that comply with applicable legal standards to secure such information from unauthorized access and use, accidental or unlawful alteration and destruction, and other unlawful or unauthorized forms of Processing. We hold our employees accountable for complying with relevant policies, procedures, rules and regulations concerning the privacy and confidentiality of information.

- **We want you to understand the type of information we collect and how we use it.**

— The types of personal information we collect from you when you visit or use our online services include your name, email address, mailing address, telephone number(s), account numbers, limited location information (for example, a zip code to help you find a J.P. Morgan office near you), user name and password. We may also collect payment card information, Social Security numbers, driver’s license numbers (or comparable), gender, race, nationality, and biometric identifiers when you provide it directly to us while using our online services and where we believe

it is reasonably required for ordinary business purposes. In some instances, we create personal information about you, such as records of your interactions with us, and details of your accounts. We do not seek to collect or process sensitive personal information unless it is required or permitted by law; necessary for the detection or prevention of crime; necessary to establish, exercise or defend legal rights; or we have your prior explicit consent.

- In addition to the personal information described above, we collect certain information about your use of our online services. For example, we capture the IP address of the device you use to connect to the online service, the type of operating system and browser you use, and information about the site you came from, the parts of our online service you access, and the site you visit next. As explained in more detail in our Cookies Policy, we and our third-party partners use cookies (as well as web beacons or other technologies) to collect and store this and other information about your visit to, or use of, our online services. We may later associate the usage and other information we collect online with personal information about you, as permitted or required by law.

Link to [Cookies policy](#)

- We sometimes collect information about you from additional online and offline sources including social media (to the extent you choose to make your personal information public) and commercially available third-party sources, such as credit reporting agencies. We may combine this information with the personal and other information we have collected about you under this Online Privacy Policy.
 - Where we are required to establish a legal basis to process your personal information as described in this Online Privacy Policy, we will do so on the basis that we have obtained your prior express consent to the processing; we have a legitimate business interest in the processing that is not overridden by your interests, fundamental rights, or freedoms; or the processing is needed to comply with applicable law, to perform under your contract(s) with us, or to protect the vital interests of any individual.
 - We use and otherwise process the information we collect from you to help us deliver our online services; to administer, evaluate and improve our business (including developing new products and services, improving existing products and services, performing data analytics and other research tasks, communicating with you via any means, and performing accounting, auditing and other internal functions); manage our risks; to market our services and products; and to comply with and enforce applicable laws and regulations, relevant industry standards, contractual obligations and our policies. We also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individuals or clients) for various business purposes, where permissible under applicable laws and regulations.

- **We aim to collect only what we need, keep it up-to-date and remove it when we no longer need it.**

- We take reasonable steps to ensure that the personal information we process is limited to what we require in connection with the purposes set out in this Policy; it is accurate and, where necessary, kept up to date; and it is erased or rectified without delay if it is inaccurate. From time to time we may ask you to confirm the accuracy of your personal information.

- For some of our online services, you can review or update certain account information by logging in and accessing the “Client Center” or a similar user profile section. If you cannot change the incorrect information online, or you prefer to request changes offline, please contact your J.P. Morgan representative using the contact information listed on your account statements, records, or other account materials.

- We will retain copies in a form that permits identification for as long as we deem necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. In particular, we will retain personal information for as long as it is needed to establish, exercise or defend any legal rights.

- **We respect and protect your privacy even when you’re on the go.**

For your convenience, J.P. Morgan offers you the ability to access some of our products and services through mobile applications and mobile-optimized websites. When you interact with us through your mobile device, we collect information such as unique device identifiers, your screen resolution and other device settings, information about your location, and analytical information about how you use your mobile device. We typically ask your permission before collecting certain information such as precise geolocation information.

- **We share personal information with affiliates and with others when we believe it will enhance the services and products we can provide to you or for legal and routine business reasons.**

- We share personal information among our affiliates and business units when we believe it will enhance the services we can provide, but only in circumstances where such sharing conforms to law, any applicable confidentiality agreements, and our policies and practices. Additionally, we reserve the right to share your personal information in connection with a corporate change including a merger, acquisition or sale of all or any relevant portion of our business or assets.

- We disclose information we have about you as required or permitted by law. For example, we share information with regulatory authorities and law enforcement officials when we believe in good faith that such disclosure is necessary to comply with legal requirements.

- We share information with third parties where appropriate to protect against fraud or verify or enforce our terms of use, our other rights, or other applicable policies.
- From time to time, we enter into agreements with other companies to provide services to us, or to make services and products available to you. If these companies receive your personal information, they are required to safeguard it and only use it for those purposes we specify.
- J.P. Morgan believes that keeping your information secure and private is important, particularly when using third-party websites and applications that can help you invest or manage your finances. In partnering with Intuit, which provides the aggregation service Mint, J.P. Morgan has taken measures to keep your logon information secure and private. When you are prompted to provide your J.P. Morgan user ID and password to Mint, you will be entering your information directly into a J.P. Morgan protected site. Mint will not see or be able to store your user ID and password, and will only require a single logon for all of your devices and browsers to work.
- We can share your personal information with any person or entity if we have your consent to do so.
- **We transmit, transfer or process information to, or through, other countries in the world, as we deem necessary, appropriate or consistent with legal or regulatory obligations.**
 - As a global company, we strive to provide you with access to the highest quality financial products and services wherever you are. To do this, we sometimes share your personal information among members of the JPMorgan Chase & Co. family of companies or service providers and other third parties that are located outside your home country. These countries may have different laws and data protection compliance requirements, with some providing more protection than others. J.P. Morgan will take appropriate steps to ensure your personal information is handled as described in this Online Privacy Policy.
 - Where required, we comply with applicable legal frameworks relating to the transfer of personal information. For example, under the European rules designed to adequately protect personal information transferred outside the European Economic Area we transfer personal information on the basis of determinations by the European Commission that certain countries adequately protect personal information, our Binding Corporate Rules, approved Model Contractual Clauses, and other valid transfer mechanisms.

- **We respect your rights concerning the processing of personal information and provide you with relevant and appropriate choices.**

Depending on how and where you interact with us, you may have a right to one or more of the following with respect to your personal information we process or control:

— request access to, or copies of, your personal information, together with details about how we process it. This must be written and submitted in Vietnamese using Form No.01 and Form No.02 as set out under the Personal Data Protection Decree (No.13/2023/ND-CP) and submitted to the contact details listed below. Copies of Form No.01 and Form No.02 are attached below;



— request rectification of any inaccuracies;
— request erasure or restriction of Processing;
— object to processing by us or on our behalf;
— have personal information transferred to another party;
— withdraw consent to processing;
— lodge complaints, denounce or initiate lawsuits;
— claim damages in accordance with the law; and
— right to self-defense in accordance with the Civil Code.

- **In addition to the rights you have under applicable data protection laws, we may give you choices regarding the sharing of personal information with affiliates and third parties based on your relationship(s) with us as a financial institution. Choices you have about the sharing of your personal information will be described in the privacy policies or notices you receive from us, such as those provided in connection with particular financial products or services you obtain from us.**
- **We respect your decisions about the collection of personal information related to your online activities over time and across different websites for advertising purposes.**
- **J.P. Morgan does not allow unaffiliated third parties to collect personal information about your online activities when you visit our online services. Nor do we use personal information collected across non-affiliated websites for the purpose of serving you advertising related to your browsing behavior. If we engage in this practice in the future, we will provide appropriate notice and choice so that you can opt-out of the practice.**
- **We tell you when our privacy policies and practices change.**

- **Contact Details**

If this Vietnam Privacy Notice Addendum applies to you and you have any comments, questions or concerns about any of the information in the Global Privacy Policy or this addendum, or any other issues relating to the processing of your personal information by J.P. Morgan under the Global Privacy Policy or this privacy notice, please contact

Vietnam Privacy Office
29 Le Duan Blvd District 1, Floor 15
Ho Chi Minh City, VN-SG, 705497, Viet Nam
Attention - Data Protection Officer

vietnam.privacy.office@jpmchase.com