

Finau Privacy Policy

1. The objectives of this Policy are:

- 1.1. Explain to the Subjects of personal data the purposes of collecting personal data, their processing, as well as the rights of the Subjects of personal data and the methods of their implementation.
- 1.2. The following abbreviations are used in the Policy:
 - 1.2.1. PD—personal data;
 - 1.2.2. DP—Data Processor;
 - 1.2.3. Law—the Decree 13/2023/ND-CP on protection of personal data as well as the Data Law 60/2024/QH15;
 - 1.2.4. CBT—cross-border transfer of personal data
 - 1.2.5. Agreement—a license agreement on the right to use the Finau virtual wallet , concluded between the Client (Subject of Personal Data) and the Data Controller.
 - 1.2.6. Product—virtual wallet Finau
 - 1.2.7. Data Controller, Finau — Limited Liability Company LENDTOP COMPANY LIMITED, Room No. 4, 1st Floor, Quang Trung Street, Ward 10, Go Vap district, Ho Chi Minh City, Vietnam, busines registration number 03215264126
- 1.3. This Policy covers the Data Controller's processes related to the processing of personal data. It is mandatory for use by the Data Controller's employees, Authorized Persons and third parties involved in the processing of personal data.
- 1.4. For the purposes of implementing this Policy, Finau is the Personal Data Data Controller. In the case of independent processing of PD, Finau is also the Data Processor. Yollet processes only the PD that is necessary to fulfill the stated purposes.

2. Purposes, methods of processing, legal grounds for processing personal data. Cross-border transfer of PD.

- 2.1. The Data Controller processes the personal data of the personal data subjects for the purposes, volume, methods and timeframes applicable to each category of personal data subjects in accordance with this Policy and the legislation of the Republic of Belarus.
- 2.2. This Policy is an integral part of the Agreement. It comes into force from the moment the Personal Data Subject clicks the "CREATE WALLET" button and puts the appropriate mark in the mobile application or on the Data Controller's website. If the Personal Data Subject does not agree with the provisions of this Policy, he/she should not open a wallet on the Finau platform .
- 2.3. The Data Controller processes personal data independently or assigns the processing of personal data to the UL on the basis of an agreement. The UL

processes PD in accordance with the Data Controller's instructions in compliance with the requirements for the processing of PD established by the Law and other legislative acts of the Republic of Belarus.

2.4. The consent of the PD Subject to the processing of PD is not mandatory. The consent of the PD Subject, if required, is obtained by the Data Controller. The Data Controller is responsible for the actions of the Data Processor in course of processing the personal data of a PD Subject, and the a Data Processor is responsible to the Data Controller.

2.5. Cross-border transfer of personal data is permitted if:

2.5.1. The territory of a foreign state ensures an appropriate level of protection of the rights of personal data subjects. The list of states in whose territory an appropriate level of protection of the rights of personal data subjects is ensured is established by the regulator in Vietnam.

2.5.2. The personal data subject has agreed to the CBT, and the personal data subject has been informed of the risks arising from the lack of an adequate level of protection.

2.5.3. PD are received under the Agreement for the execution of the duties established by the Agreement;

2.5.4. PD may be obtained by any person by sending a request in cases and in accordance with the law.

2.5.5. The transfer of personal data is necessary to protect the life, health or other vital interests of the personal data subject or other persons if obtaining the consent of the personal data Subject is impossible.

2.5.6. PD are processed within the framework of the implementation of international treaties of Vietnam.

2.5.7. The transfer of personal data is carried out by the financial monitoring body to prevent the legalization of proceeds from crime, the financing of terrorist activities and the proliferation of weapons of mass destruction .

3. Obtaining consent from the Personal Data Subject for the processing of Personal Data

3.1. The consent of the Subject is obtained in accordance with paragraph 2.2 of the Policy. If the Subject of PD does not agree with the Policy, he cannot register and use the Finau wallet , nor accept the Finau user agreement .

The Subjects of the personal data may revoke their consent without giving reasons, make changes to the personal data, and also receive information regarding the processing of personal data by submitting an application to the Data Controller in writing:

- A) to the Lendtop Company Ltd. Postal address: Room No.4, 1st floor, Quang Trung street, ward 10, Go Vap district, Ho Chi Minh City, Vietnam; and/or
- B) in the form of an electronic document to the address info@finau.io.

The application is considered received from the moment of its delivery to the Data Controller. The procedure for changing, deleting or blocking personal data is regulated by the Law.

3.2. The revocation of consent by the subject of personal data does not have retroactive effect.

3.3. The subject of personal data receives a reasoned refusal to perform actions in accordance with clause 3.1 of the Policy if:

3.3.1. His appeal does not contain all the information required by law.

3.3.2. If he does not have the right to access the requested information. Other reasons for refusal are set out in the Law.

3.3.3. When concluding an agreement, the client (subject of personal data) is obliged to confirm that their personal data corresponds to the information specified in the registration form by providing an identity document.

4. Processing of PD

4.1. Processing of personal data is carried out in accordance with the law of the Vietnam.

4.2. Processing of personal data is permitted:

4.2.1. By the Data Controller's employees who process personal data in accordance with their job responsibilities.

4.2.2. The Data Processor, to whom the Data Controller has the right to entrust the processing of PD on behalf of or in the interests of the Data Controller.

4.3. The storage period of personal data is determined by the purposes of processing personal data, unless another storage period is established by an agreement or personal data.

4.4. The Data Controller stops processing personal data if:

4.4.1. Unlawful processing of personal data has been detected.

4.4.2. The consent of the Subject of Personal Data for their processing has been revoked.

4.4.3. A request has been received from the Subject of Personal Data to delete them.

4.5. The Data Controller continues to process personal data beyond the specified period if the need for this arises from the law of Vietnam.

4.6. PD as a photo of the face of the PD Subject are collected in a volume sufficient to form a private Face ID key, which is necessary for:

4.6.1. Finau application or website .

4.6.2. Ensuring the safety of the assets of the Personal Data Subject.

4.7. Finau generates a digital key based on Face ID. It is used for authorization in the application or on the website. Finau does not store photos or videos with the image of the user himself/herself.

4.8. Digital key generated based on Face ID , stored for the duration of use of the Product.

5. Purposes of personal data processing. Other provisions.

5.1. PD are processed:

5.1.1. To execute the Agreement.

5.1.2. To comply with the regulatory legal acts of Vietnam.

5.1.3. For other purposes inextricably linked to the execution of the Agreement.

5.2. The Data Controller notifies the regulator in Vietnam, as well as the Personal Data Subject, in the event of loss or disclosure of personal data not due to the fault of the Personal Data Subject.

5.3. Compliance with the requirements of the Policy is assigned to the Data Controller's official responsible for organizing the processing of personal data.

5.4. Types of personal data and purposes of their processing (Agreement means a license agreement for use of the Finau product between the PD Subject and the Data Controller as per the Offer of the Data Controller:

Target	Description	Processed PD	Reason for processing
Response to the received request	An appeal received by e-mail or postal address, or in another form.	Full name, telephone number, email address, and other information specified in the request	Agreement
Conclusion, execution, modification and termination of the Agreement	Personal data of Clients (their representatives) required for concluding, changing, and executing an agreement where the Client is a party	Client data provided within the framework of the conclusion and execution of the Agreement	Agreement
Conclusion, modification, termination, execution of contracts with	Data on individual contractors and their performers, necessary for concluding, amending,	Presented data	Agreement

individual contractors	terminating, and executing contracts with them		
Identification (verification). accounting and systematization of PD Subjects on the website or in the mobile application	To implement the powers and duties of the Data Controller in accordance with the law. For feedback with the Personal Data Subject. To establish the location of the Personal Data Subject's device to avoid fraud and ensure security.	Data transmitted via the application. IP address. Cookie information . Information about the browser or Internet access program. Internet access time. Email address. Biometric PD.	Agreement
Persons visiting the Data Controller's website	Implementation of the Data Controller's powers and duties in accordance with the law. Establishing feedback. Confirmation of the accuracy and completeness of the personal data provided by website visitors. Providing access to the websites or services of the Data Controller's partners to purchase goods (works, services) or obtain information. For other purposes with the consent of the site visitor.	Cookies , statistical data. Data on the behavior and preferences of individuals visiting the Data Controller's website (through the services such as Google Analytics) IP addresses. Information about the facts of filling out forms on the site.	Agreement
Authorized persons	To fulfill the Data Controller's obligations under contracts with counterparties, including the	Full name, details of identity document, registration address, residential address, telephone number.	Agreement

	provision of information and statistical services and promotion of services.		
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5.5. The Policy has been developed in accordance with the law of Vietnam, the applicable law is the law of Vietnam. In the event of disputes arising from this Policy, they shall be considered in the court of Vietnam at the location of the plaintiff.

5.6. The Data Controller has the right to accept a new version of this Policy at any time, make changes and/or additions to it unilaterally (here—Changes). The Personal Data Subject agrees that the Data Controller has no obligation to notify the Personal Data Subject of the Changes made. In this regard, the Personal Data Subject is obliged to independently and regularly familiarize themselves with the Changes at the link: finau.io.

5.7. If you have any questions regarding this Policy, please contact us by email at : info@finau.io.