**PERSONAL DATA POLICY**

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# Giới thiệu

The Center for Development and Integration (us) is committed to protecting and respecting the privacy of individuals. The Personal Data Policy will explain why we need to collect personal information, how we use the collected information, where we store it and the possibility of sharing data with third parties.

When accessing our website, applications, Facebook page, participating in studies, seminars, conferences, and events organized by us or in collaboration with our partners, sending information to us or expressing consent in any way, you have accepted and agreed to the terms of this Personal Data Policy. This personal data policy complements but does not replace any other consent regarding personal data you have previously provided to us.

This policy complies with the Law on Cyber ​​Information Security No: 86/2015/QH13, Law on Information Technology No. 67/2006/QH11, Civil Code 2015 No: 91/2015/QH13 and other by-laws about personal data protection. CDI has the responsibility to protect personal data. In specific cases, personal data will be shared at the request of the competent authority, audit, or sponsor (See also in Section 7). In all cases, we ensure that these parties must guarantee the protection of privacy and security rights.

Please note that we may amend this Personal Data Policy at any time without prior notice and will notify you of any amendments via our website at <http://www.cdivietnam.org>. Please check back regularly for updates on the processing of your personal data. You agree or will be deemed to agree to be bound by such modified, supplemented, changed or adjusted personal data policy when you continue to access our website, application, fanpage; participate in studies, seminars, conferences and events organized by us or in collaboration with our partners.

**CDI's Personal Data Policy is effective as of September 1, 2022.**

# What is personal data ?

Personal data is understood as all information relating to an identified or identifiable natural person, whether directly or indirectly. In particular, information relating to names, identification numbers, residency data, telephone numbers, or any one or more specific factors related to the physical, psychological, physiological, genetic, economic, cultural or social identity of the individual. In other words, disparate pieces of information that, if collected and aggregated, can lead to the identification of a particular individual are also considered personal data or personal information. This information can be objective information such as full name, date of birth, height, weight, etc. and subjective information such as assessment of the employer1.

1 *General Data Protection Regulation -* GDPR

Vietnamese law uses the term “personal information” to refer to personal data. Personal information is governed by laws in the field of information technology and network information security. According to the provisions of Clause 15, Article 3 of the Law on Cyber ​​Information Security (ATTTM) 2015, personal information is understood as information associated with identifying a specific person. Clause 5, Article 3 of Decree No. 64/2007/ND-CP dated April 10, 2007 on information technology application in state agencies’ activities stipulates: “Personal information is information sufficient to identify the identification of an individual, including at least the following information: full name, date of birth, occupation, title, contact address, email address, telephone number, identification number population, passport number. Confidential information including medical records, tax records, social insurance number, credit card numbers and other personal secrets.

# Why do we collect personal data?

We use personal data for the following purposes:

* + 1. To manage administrative and financial activities to ensure compliance with policies, internal procedures, record-keeping regulations and donors’ regulations;
    2. To process any communications sent to us (e.g. answering inquiries and handling with any complaints and feedback)
    3. To send announcements, results of service or product delivery, results of studies, surveys;
    4. Any purpose related to the foregoing.

# Rights of the personal data subject(s)

Subject(s) of the personal data we collect have the rights to:

* Be informed about how their personal data is collected and used. We are obliged to inform the purpose of processing personal data, how long the data is stored and with whom the data may be shared;
* Get access to your personal data. In particular, personal data subject(s) are entitled to receive confirmation from us about the processing of their personal data;
* Request correction, update of the data in case of data errors; delete the data if certain criteria are met; and to restrict certain data usage in some cases, including temporarily move the selected personal data to another processing system, make the selected personal data unavailable to the user, or temporarily take the selected published personal data off the website;
* Receive the data provided to us and request transmission of this data to third parties, without hindrance from us in responding to the request set forth.
* Complain in accordance with the law if:

1. Your personal data is compromised;
2. Your personal data is processed for the wrong purpose, not in accordance with the agreement or the law;
3. Your rights regarding your personal data are violated or not properly exercised.

* Claim compensation in accordance with the law when there are grounds to prove that your personal data has been infringed.

# Types of personal data we collect

In order to fulfill one or more of the data purposes stated in Section 4 of this document, we will need to collect the relevant personal data. The personal data we collect may include (but is not limited to) the following:

1. Contact information such as name, date of birth, documents that support identifying personal identification (including national identity card/citizen identification number or passport number), gender, nationality and race, education level, blood type, tax identification number, health insurance number, marital status, frequently used language, current home address, landline and/or mobile number, fax number and email address;
2. CCTV or image recording (using camera or smartphone) when you visit our office or participate in any of our events, both offline and online;
3. Internet protocol (IP) address, browser type, internet service provider (ISP).

# When do we collect personal data?

We collect personal data directly when the personal data subject(s):

1. Communicate with us (for example, when you contact us for inquiries; including through phone calls, mailings, face-to-face meetings, emails, the FAQs section and our fan page;
2. Become our staff, interns and volunteers;
3. Agree to participate in surveys, research or events organized by us or in collaboration with our partners;
4. Apply online or in person for positions at our office;
5. Respond to any documents we sent;
6. Visit our office;
7. Provide us with feedback (for example, via our website, email address, or with hard copy);
8. Perform contractual obligations with the data subject or for the tasks required by the data subject in the process of contracting;
9. Perform data processing activity to perform a task for the public interest or a competent authority;
10. Submit their personal data to us for any other reason.

In addition to the personal data we obtain directly as detailed above, we may collect personal data from third parties that cooperate with us or data authorized for disclosure and/or as permitted by law.

# Personal data

We will ensure all personal data confidential in accordance with Section 8 of this policy, but through this document, the data subject(s) have given their consent and allow us to provide or disclose personal data for the entities below:

* + 1. Our auditors, consultants, accountants, attorneys, financial advisors or sponsors;
    2. Companies and/or organizations and individuals that assist us in processing and/or performing work related to studies, surveys or events organized by us;
    3. The relevant government regulatory body, competent authority, or law enforcement agency to ensure compliance with any rule, code, guideline, regulation or plan issued by any government agency regarding safety, security and compliance with the law.
    4. Other parties related to the personal data subject which they have expressly agreed in the past;
    5. The bank performing financial services for us.
  1. **Processing and securing personal data**

Personal data processing is one or more of our actions to affect personal data, including collecting, recording, analyzing, storing, altering, disclosing, granting access, retrieving , recovering, encrypting, decrypting, copying, transferring, deleting, terminating personal data or other related actions.

We take technical and organizational measures to protect personal data collected during our operations. Personal data is classified and can only be accessed by authorized personnel. Any data we collect through online forms or in person is processed securely by us. In the event that third parties participate in the processing of personal data in the course of performing services provided to us, they must sign an agreement and pledge to keep the personal data to which they have access to confidential . Technical measures that will be used to protect personal data:

* + We will appoint an officer (part-time) in charge of the database. This officer will work as a moderator, internally reviewing compliance with the personal data policy and is responsible for reporting to the competent data protection authority.
  + We will periodically conduct internal reviews of the security of personal data of employees, customers, and beneficiaries.
  + We take appropriate technical and organizational measures to ensure an appropriate level of security against risks. Technical measures include, but are not limited to, encrypting personal data, setting access password(s). Organizational measures include training staff on personal data policy, limiting access to personal data to a limited number of employees who need to use it.
  + We will maintain detailed documentation of the personal data we are collecting, how it is used, where it is stored, and who is responsible.
  + We have bound service providers to a contractually general personal data policy, and exercised oversight over the implementation of this policy by service providers.

# Responding to personal data breach

In the event that the data is leaked, accessed, altered or stolen, we are obligated to report it to data subjects, even if there is a breach that occurs when processing data for customers in accordance to the contract. If we can determine that no personal data is at risk, this obligation is no longer required unless the lost data is sensitive data.

The obligation to report a data breach may be waived when we can demonstrate that technological safeguards to protect the data, such as encryption, have been used to render the data useless for the attacker.

# Deleting or terminating personal data

We will stop storing, delete personal data and terminate the means of storing personal data in the following cases:

* + Personal data registered is improperly processed or notified to the data subject;
  + The maintenance of personal data storage is no longer required for our operations;
  + Twenty years after the data subject's death, unless the data subject decides otherwise.

# Contact us – For accessing and editing

If the personal data subject has any questions regarding our processing of their personal data, or our purpose of usage, or to raise any of their rights under the current data protection law, please contact us using the information below:

* + Phone number: **+842435380100**
  + or/and email to the address: [phanhoi@cdivietnam.org](mailto:phanhoi@cdivietnam.org)
  + Message via fan page : <https://www.facebook.com/cdivietnam.ngo>
  + Mail directly to the organization’s office at: Center for Development and Integration, 16th floor, 169 Nguyen Ngoc Vu, Trung Hoa ward, Cau Giay district, Hanoi, Vietnam.

We will process any feedback according to our instructions in the *Regulations and procedures for receiving and processing feedback.*