

SECURITY POLICY

CUKCUK always understands that you are very interested in how your personal information providing to us is kept confidential and used. We are committed that your information will be secure. We also make sure to use the information in a reasonable and considerable manner to constantly improve the quality of service, bring you a better experience when buying and using our products and services.

Please take a moment to read our Privacy Policy and contact us if you have any questions.

Article 1: Collection and use personal information

Personal information is data used to identify or contact a person.

You may be requested to provide your personal information whenever you contact us or our agents. CUKCUK and its agents may share this personal information with each other and use it in accordance with this Privacy Policy. We may also combine personal information with other information to provide and improve the company's products, services, content and advertising and communication. If you have purchased a subscription of CUKCUK software, you should read this [Privacy Policy](#) together with the [Terms of Use](#), which clearly state the agreements between you and us.

Here are some examples of the types of personal information we can collect and how we can use that information.

Our information collection

- When you create an ID, buy CUKCUK Software, download a software update, inquire after our services or products, or participate in any online survey, ... we may collect a variety of information, including your name, address, phone number, email address, subscription packages, your mobile device information and any additional information you provide.
- When you use our support services you might provide additional information necessary for us to provide support services, testing and diagnostic, and quality control processes. Some customer care and support telephone calls are voice-recorded for quality and supervision purposes. These recordings are maintained in a secure environment and subject to periodic destruction in accordance with our document and information retention policies and practices.
- We may also receive and maintain electronic communications including e-mails from prospective in relation to marketing, sales, support, and product delivery process and in order for us to fulfill our contractual and legal obligations to you and our customers.

How we use your personal information

- We use your personal information to fulfill and support our contractual obligations, provide information on CUKCUK's latest products and services, software updates, support issues you may encounter when using the product and service, notify you of changes in our service or terms and

conditions of use. We may also use your personal and non-personal information to send marketing communications including event invitations, special promotions. If you don't want to be on our mailing list, you can opt out anytime by contacting us at khieunai@misa.com.vn.

- We use the information to help us develop, deliver, and improve our product and service including support services, advertising and communication.
- We use the information to send important notices, such as communication about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with MISA, you may not opt out of receiving these communications.
- For internal purposes such as auditing, data analysis, network and IT security, and research to develop technology, products, services, customers and user experience.
- If you enter into a contest, special offer or coupon program, or similar promotions we may use the information you provide to administer those programs.

Article 2: Collection and Use of Non-Personal Information

We also collect non-personal information – data that do not have direct association with any specific individuals. We may collect, use, transfer, and disclose non-personal information for any purposes. Some examples of non-personal information that we collect and how we may use it as follows:

- We may collect information such as occupation, language, area code, unique device identifier, location, and the time zone where a CUKCUK product is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We may also collect information regarding customer activities when using the product. This information is aggregated and used to help us provide more useful information to our customers and to understand which features of our product and service are of most interest, how they are used, and how they can be improved. Aggregated data is considered non-personal information for the purpose of this Privacy Policy.

If we do combine non-personal information with personal information, the combined information will be treated as personal information.

Article 3: Consent and Our Relationship with You

We take your privacy concerns and preferences seriously. Where you have contacted us or registered in receiving information about our services (including pricing or quotations) or have provided your personal information for marketing purposes (including event registration, software downloads), you have given your consent to receiving communications by phone, e-mail in response to your inquiries. When you subscribe to services and establish a commercial and contractual relationship with us, we are required to communicate with you and maintain associated data and information in order to fulfill our contractual obligations, record-keeping for business purposes,

and to provide you with ongoing information about MISA services, enhance your ability to use our services.

Article 4: Unsubscribe and Withdrawing Consent

If you are not customers of MISA and wish to cease receiving communications from MISA you can click the “unsubscribe” button on communications from MISA or contact khieunai@misa.com.vn.

If you are customers of MISA and have concerns about data or information maintained by MISA, please contact khieunai@misa.com.vn. Where we must collect personal information for legal reasons or pursuant to our contract with you, if you fail to provide us with that information or wish us to cease using it then we may not be able to continue to fulfill our contractual obligations which may require us to cancel a contract or service, in which event you will be subject to payments or cancellation fees based on the contract or license terms.

Article 5: Cookies and Other Technologies

CUKCUK’s website, online services, interactive applications, email messages, and advertisements may use “cookies” and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our website people have visited, and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

We and our partners use cookies and other technologies in digital advertising services to control the number of times you see a given ad, deliver ads that relate to your interests, and measure the effectiveness of ad campaigns.

We and our partners also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience more convenient and personal. For example, knowing your first name or other identifier lets us welcome you the next time you visit or use the products or services. Knowing your country and language helps us provide a customized language experience.

If you want to disable cookies, go to the browser settings section and turn it off. On your mobile device, go to Settings, then Safari, and then to the Cookies section. For other browsers, check with your provider to find out how to disable cookies. Please note that certain features of website, applications, or services may not be available if cookies are disabled.

As is true of most websites, we gather some information automatically and store it in log files. This information includes IP addresses, language of browser, Internet service provider (ISP), referring pages, operating system, date/time stamp, and clickstream data. We use this information

to understand and analyze trends, to administer the site and services, to learn about user behavior on the site, and to gather demographic information about our user base as a whole. We may use this information in our marketing and advertising services and in communications with you. Pixel tags enable us to send email messages in a format that customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

Article 6: Disclosure to Third Parties

We may make certain personal information available to partners to provide or support our or their products, market to customers or improve the user experience for our customers. For example, when you purchase and activate our services, you authorize CUKCUK and its partners to exchange the information you provide during the activation process to carry out service. If you approve of using the service, your account will be governed by CUKCUK and its partners according to Terms of use and Privacy policies. Personal information will only be shared by CUKCUK to provide or improve our products, services and advertising and corporate communications; it will not be shared with third parties for their marketing purposes.

Article 7: Others

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for CUKCUK to disclose your personal information. We may also disclose information about you if we determine that is necessary or compelled by law. We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or acquisition we may transfer any and all personal information we collect to the relevant third party.

Article 8: Protection of Personal Information

We takes information protection measures based on ISO 27000 standard (Information security management system standards), CSA Star (Information security certificates for cloud computing services) and GDPR (General Data Protection Regulation) which are certificated by competent organizations, including administrative, technical measures — to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction.

Article 9: Integrity and Retention of Personal Information

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law or our document retention policies and procedures.

Article 10: Authority to Your Personal Information

We provide you with access so you can request that we correct the data if it is inaccurate or delete the data if it is not required to retain by law or for legitimate business purposes. You have the following rights in relation to your personal information that we possess: (i) to correct any errors or inaccuracies in that information; (ii) to request the deletion or destruction of information subject to some qualifications; (iii) to restrict or limit our use of the data subject to our legal and contractual obligations. Upon your request we will fulfill the preceding rights as soon as reasonably practicable.

Article 11: Children

We do not knowingly collect personal information from people under the age of 18. If we learn that we have collected the personal information of a child under 18 we will take steps to delete the information as soon as possible. Our marketing, sales, and services are not directed at people under the age of 18.

Article 12: Third-Party Sites and Services

CUKCUK's websites, products, applications, and services may contain links to third-party websites, products, and services. Information collected by third parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

Article 13: Our Commitment to Your Privacy

We communicate and train this Privacy Policy to CUKCUK employees to ensure that the policy provisions are implemented correctly and in compliance with the law.

Article 14: Contact Information

If you have any questions or concerns about CUKCUK's Privacy Policy or information about your personal data, please contact us at khieunai@misa.com.vn.

We may update our Privacy Policy according to need or law. When we change the policy, we will notify on our website along with the updated Privacy Policy.

Updated: August 12th, 2019.