



Privacy Policy

15.08.2023

References to "our", "us", "we" or "Utop" within this Privacy Notice are to Utop JSC. and its affiliate companies.

This Privacy Notice governs the collection and use of personal data by Utop in relation to the use of our websites or when we (or a service provider of ours) are provided your personal data. For more information about us, please see: <https://utop.io/> .

This Privacy Notice explains the types of personal data we collect; how we use that information; who we share it with; how we protect that information; and your legal rights.

Please read the following carefully as it explains our views and practices regarding your personal data, and how it is handled.

For the purpose of applicable data protection laws, the data controller currently is Utop JSC, 561A Dien Bien Phu Street, Ward 25, Binh Thanh District, Ho Chi Minh City, Vietnam.

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How we collect information

Information covered by this Privacy Notice

This privacy notice applies to all personal data collected and used by Utop in relation to your use of our websites, as well as other interactions you have with us. Personal data is information that can be used to identify you, either directly or indirectly. This may include your name, company name, contact information, location, preferences, comments, and technical information about the devices you use to access our websites.

We collect personal data for a variety of purposes, including to provide you with our products and services, to communicate with you, to improve our products and services, and to comply with legal requirements. We may also share your personal data with our partners and service providers, but only in accordance with this privacy notice.

We take your privacy seriously and will protect your personal data in accordance with applicable law. You have a number of rights in relation to your personal data, including the right to access, correct, and delete your data.

Information you provide to us

Sure, here is a paraphrased version of the text you provided:

Utop and its service providers may collect personal information from you (such as your name, contact information, company, preferences, and comments) in a variety of ways, including:

- When you purchase equipment or software from us
- When you submit information through our websites
- When you create an account with us, register for a service, or opt in to receive marketing communications from us
- When you communicate with us via social media
- When you contact us, correspond with us, or provide information to us
- When your information is supplied to us by a third party

In some cases, you may provide personal information to us about another person. In such cases, you should only do so if you have the authorization of such person to provide us with this information and for us to use this information as explained in this privacy notice.

Website usage information and other information collected automatically

When you visit Utop's websites, we and our service providers may use certain technologies to collect information about your visit, such as:

- Your browser type and version
- Your location and time zone
- Your browser plug-in types and versions
- Your operating system and platform
- Page response times and download errors
- The websites you visited before our websites
- Products or services you viewed or searched for

- The number of visits to our websites
- The length of your visits to certain pages
- The pages you viewed
- Information about how you interacted with the pages (such as scrolling, clicks, and mouseovers)
- How you browsed away from the page

Similar information for additional content that can be accessed from website pages, such as opening or printing documents or which videos were played and for how long.

We use this information to improve our websites, to analyze traffic patterns, to track user behavior, and to deliver targeted advertising. We may also share this information with our partners and service providers, but only in accordance with this privacy notice.

You can opt out of cookies by changing your browser settings. However, this may prevent you from using some of the features of our websites.

How we use personal information

We use the personal information we collect from and about you for a variety of purposes and based on one or more legal justifications, as set out below:

Purpose	Personal information required	Legal basis for processing
To ensure that content from our websites are presented in the most effective manner for you and your computer.	Details of your device, IP address and website usage information.	Legitimate interests: It is in our legitimate interests to process personal information in order to provide you with an effectively presented website.
To set up and manage your website registration.	Name, email address, IP address, website usage information.	Compliance with legal requirements: This processing is necessary for the purposes of complying with legal requirements to which we are subject and/or performance of our contract obligations.
To provide the company you represent (or you directly) with requested products or services, and subsequent client care.	Name and email address.	Compliance with legal requirements: This processing is necessary for the purposes of complying with legal requirements to which we are subject and/or performance of our contract obligations.
To deal with your queries and requests, including to identify you when you contact us.	Contact details.	Legitimate interests: It is in our legitimate interests to process personal information in order to provide you with a tailored answer to your queries and requests. This processing is also necessary to provide you with the requested information and / or service, thus to comply with service obligations.
To allow you to participate in interactive features of our service (including any surveys) when you choose to do so.	Contact details.	Legitimate interests: It is in our legitimate interests to process personal information in order to allow you to participate in interactive features of our service (including surveys).
To provide you with information about our products and services (provided you have consented to this when required).	Contact details and email address.	Consent: We will ask for your consent before processing your information in this way when required. In addition, we will always give you the option to withdraw your consent (opt out) in each message.

To design our products and services and to help us develop new services and products.	Non-identifying information about your visit to our website, including browser type, scrolling patterns, device type, and country.	Legitimate interests: It is in our legitimate interests to process this information in order to improve our offerings as a business.
To manage our risks to help identify illegal activity, as required under applicable law.	Personal information, such as name, contact details, and account information.	Legal obligation: This processing is necessary for the purposes of complying with legal requirements to which we are subject.
To comply with legal and regulatory requirements.	Personal information, such as name, contact details, and account information.	Legal obligation: This processing is necessary for the purposes of complying with legal requirements to which we are subject.
To add you to our customer database, facilitated by Salesforce, in order to keep internal records and manage our relationship with you.	Personal information, such as name, address, account details, and marketing preferences.	Legitimate interests: It is in our legitimate interests to keep records of your personal details and update these when necessary. It is also in our legitimate interests to keep records of any correspondence with you. Our customers are important to us and so we need to keep track of your details and preferences.
To process your personal information where this is necessary to keep our websites safe and secure.	Personal information, such as IP address and website usage information.	Legitimate interests: It is in our legitimate interests to monitor how our websites are used to detect and prevent fraud, other crimes, and the misuse of our websites. This helps us to ensure that you can safely use our websites. In some instances, we may need to process information in this way to comply with laws that require us to keep our websites safe and secure.
To notify you about changes to our service.	Contact details.	Legitimate interests: It is in our legitimate interests to process your personal details in order to notify you of changes to our service. In some instances, we may need to process information in this way to comply with laws that require us to notify about changes in our services.
To keep an up-to-date suppression list where you have asked not to be contacted, in order for us to not inadvertently re-contact you.	Name and email address.	Legitimate interests: It is in our legitimate interests as we, pursuant to good marketing practice are obliged to process personal information to maintain an up-to-date suppression list and ensure that we do not contact you where you have asked us not to.
To allow you to subscribe and follow products or services you're interested in, and to use this information to personalise your web experience and provide monthly materials to which you have subscribed including email updates.	Email address and other contact details.	Consent: We will ask for your consent before processing your information in this way when required.

The provision of your personal data is necessary when data is needed for the purposes of entering into or servicing a contract that a company has with us or to receive the products or services or information you or your company request, or to comply with applicable laws and regulations. Refusal to provide your information would make it impossible for us to provide the products, services or information requested and to fulfill our contract obligations.

With whom do we share personal information

We may share your personal information with a few carefully selected third parties. These third parties may include:

- **Our family of companies.** We may share your personal information with our subsidiaries and affiliates to provide you with a better experience and to better understand your needs.
- **External auditors.** We may share your personal information with external auditors to help us ensure that our financial records are accurate.
- **Service providers.** We may share your personal information with service providers who help us deliver our products and services to you. This may include IT companies, marketing companies, and customer service companies.
- **Third parties permitted by law.** We may share your personal information with third parties if we are required to do so by law or if we believe it is necessary to protect our legal rights.
- **Third parties connected with business transfers.** If we sell or transfer our business, we may transfer your personal information to the new owner.
- We will never share your personal information with third parties for the purpose of direct marketing to you.

We will always take steps to protect your personal information when it is shared with third parties.

Where we store your personal information

The personal information that we collect from you may be transferred to, and stored at, a destination outside the jurisdiction in which you are located.

If you are located in the European Economic Area ("**EEA**"), this means the personal information may be transferred to, and stored at, a destination outside the EEA, including to Utop in Ho Chi Minh City, Vietnam. It may also be processed by staff operating outside the EEA and who work for us, an affiliate or for one of our Service Providers. If you are located outside the EEA, in addition to the above, this means that personal information may be transferred to, and stored at, a destination in the EEA.

For transfers outside the EEA, Utop will be bound by the EU Standard Data Protection Clauses (pursuant to Article 46(2)(c) GDPR), which the European Commission has assessed as providing an adequate level of protection for personal data (or other appropriate safeguards), to ensure that your data is protected adequately.

You can ask for a copy of such appropriate safeguards by contacting us as set out below (**Contact Us**).

Your choices/your privacy rights

We offer several rights concerning the handling of your personal data, each of which is detailed below. Should you wish to exercise any of these rights, kindly get in touch with us via email at engage@utop.io. Please provide your name, email address, postal address, along with your specific request and any additional information required for us to fulfill or process your request.

Access: You may possess the right to confirm whether we process your personal data. If so, you can request access to this data, including details like the types of personal data processed, the purpose of processing, and the recipients or categories of recipients. Please note that while this isn't an absolute right and the interests of others need consideration, we might charge a fee for multiple copies.

Rectification: You might have the right to correct any inaccurate or incomplete personal data related to you.

Deletion: You could ask us to delete your personal data, except when we're legally obligated to retain such data or need it to establish, exercise, or defend legal claims.

Restriction: In specific cases, you may request us to limit the processing of your personal data. This could be applicable if you believe the data is inaccurate, the processing is unlawful, or if we no longer need it for a particular purpose. In such instances, where deletion isn't possible due to legal obligations or your preference, we would mark the stored information to limit its processing based on your request.

Portability: You might have the right to receive your personal data, which you provided to us, in a structured, easily readable format. Additionally, you may be able to transmit this data to another entity.

Objection: Under certain circumstances, you can object to the processing of your personal data, including profiling. You might also have the right to request human intervention in cases involving automated decisions, allowing you to express your viewpoint and contest the decision.

Withdrawal of Consent: If you've previously given consent for us to process your personal information, you can withdraw that consent at any time. If you wish to do so, including opting out of receiving our communications, kindly contact us at engage@Utop.io or follow the opt-out instructions in our emails. Please note that even if you opt out of promotional correspondence, we might still contact you regarding your account, relationship, activities, and communications with us.

For individuals in the European Economic Area (EEA) or Switzerland, here's a link to a list of local data protection authorities: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

If you're in any other location or the issue pertains to a different location, please reach out to us at engage@utop.io.

Please note that the aforementioned rights are specific to personal information.

For how long do we keep your personal information

We will retain your personal data solely for the duration necessary to fulfill the purpose for which it was gathered, and within the limits permitted by relevant laws. Once your information ceases to serve its purpose, we will either eliminate it from our systems and records or initiate measures to promptly render it anonymous, preventing your identification (unless legal or regulatory obligations mandate us to retain the data). Certain personal data within contracts, communications, and business correspondence could be subject to mandatory retention periods, potentially spanning up to 10 years. Generally, other personal data will be deleted approximately 7 years following the conclusion of the contractual association.

Security

We have put in place technical and organizational security measures to protect the personal information under our care. These measures include limiting access to personal data to only those employees, contractors, and authorized Service Providers who require such information for the purposes outlined in this Privacy Notice. We provide training to our employees and contractors, and we employ various technical, administrative, and physical safeguards.

While we consistently strive to ensure the security of our systems, websites, operations, and information against unauthorized access, use, alteration, and disclosure, it's important to recognize that the Internet operates as an open global communication platform, and there are inherent risks involved. Due to these risks and other factors, we cannot provide an absolute guarantee that any information, whether during transmission or while stored on our systems, will be entirely secure from intrusion by unauthorized parties like hackers.

To access certain content on our websites, you might need to register and create a username and password. You bear the responsibility of maintaining the confidentiality of your online credentials, and we strongly advise against sharing your username or password with anyone. We will never request your password through unsolicited communications. If you suspect any unauthorized use of your online credentials or encounter a potential security breach, please inform us immediately (refer to the Contact Us section below).

[Contact Us section]: Should you need to reach us regarding these matters, please notify us promptly.

California-Specific Privacy Disclosures

Effective January 1, 2020, the California Consumer Privacy Act (“CCPA”) provides for several new rights related to your personal information as a California consumer (as that term is defined in the CCPA). This privacy policy addendum will set forth (i) our disclosure of the categories of data we have collected on our website over the past twelve (12) months; (ii) the sources of each of those categories of data; (iii) why and how we use your data, and with whom we have shared it in the past twelve (12) months; (iv) the new rights you may have under the CCPA; and (v) how to exercise your rights with respect to your personal information that Utop has collected.

Please note that Utop does not sell your personal information, so the sections of the CCPA which deal with your rights as they regard sale of your data do not apply and therefore are not addressed in this policy. We are obligated to update this privacy policy if our practices change and every twelve (12) months, so if those practices ever change, those changes will be posted here.

I. Categories of Data Collected

A. Identifiers.

Depending on the extent to which you have engaged with us, we (and our service providers) may have collected the following personal information in the past twelve (12) months:

- Your name
- Your email address
- Your telephone and fax numbers
- Your company
- Your Job Title
- Your Region
- Your site preferences
- Your comments and questions entered into the Utop website form or emailed to Utop

B. Internet/Electronic Activity.

We (and our service providers) have also used certain technologies to automatically collect the following information if you have visited our site in the last twelve (12) months:

- Technical information, including your browser type and version, location and time zone setting, browser plug-in types and versions, operating system and platform, page response times and download errors;
- Information about your visit, including the websites you visit before our websites and products or services you viewed or searched for;
- Number of visits, length of visits to certain pages, pages viewed, page interaction information (such as scrolling, clicks and mouseovers) and methods used to browse away from the page; and
- similar information for additional content that can be accessed from website pages, such as opening or printing documents or which videos are played and for how long

Utop does not use cookies on its website.

II. Source of Data Collected

Utop collects personal information directly from you. Utop uses Google Analytics to automatically collect the technical information specified in Section I(B) above.

III. Why and How We Use Your Data

A. Purposes of our Data Collection.

We use the personal information we collect from and about you for a variety of purposes, as set out above.

B. Categories of Data Disclosed for a Business Purpose.

Utop does not disclose to third parties or sell any information it collects from or about you.

IV. Understanding Your Rights

The CCPA provides new rights to California consumers. You are a California consumer if you are a California resident, regardless of whether or not you have a customer or any other relationship with Utop.

A. Right to Know

You have the right to request disclosure of our data collection and sales practices in connection with your data, including the categories of personal information we have collected about you, the source of the information, our use of the information and, if the information was disclosed or sold to third parties, the categories of personal information disclosed or sold to third

parties and the categories of third parties to whom such information was disclosed or sold. You have the right to request this specific personal information collected about you during the twelve (12) months before your request.

B. Right to Request Deletion

You have the right to request that Utop delete your data. However, it may be necessary for us to maintain your personal information under certain circumstances. For example, we may not be able to delete your data if we require your data to complete a transaction with you, to provide a good or service to you, to comply with a legal obligation, to enable internal uses which are reasonably aligned with your expectations based on your relationship with the business, to detect security incidents or malicious, deceptive or fraudulent activity, or otherwise to use your personal information internally and lawfully in a way that is compatible with the context in which you originally provided the information and with the data retention exceptions provided under California law.

C. Right to Request Information Not Be Sold to Third Parties

You have the right to request that Utop not sell your information to third parties. However, Utop does not sell personal information to third parties, and will update this privacy policy if those practices change in the future.

D. Right not to be Discriminated Against Because You Exercise of Your Rights

The CCPA prohibits Utop from discriminating against you for exercising your CCPA rights. This means that Utop may not charge you a difference price, deny you goods or services, or impose penalties on you because you elected to exercise your rights.

V. How to Exercise Your Rights

We take our responsibilities to you under the CCPA very seriously. If you have any questions about this policy, or wish to exercise any of your rights, we have provided a few ways for you to do that.

If you would like to request the categories of data we hold about you, or request that we delete your data, you may email us at engage@Utop.io. Utop is bound by the CCPA to ensure all requests are verifiable, so please include your name and email address at a minimum so that we can follow up with you appropriately.

Upon receiving your request, we will promptly acknowledge receipt and begin the verification process. Once we are able to complete the verification process, we will provide you an estimate of when you can expect your request to be fulfilled; or, if we cannot comply with your request, we will inform of you of that and the reason(s) why in writing.

Changes to this Privacy Notice

This Privacy Notice is written in English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

We reserve the right to change our Privacy Notice from time to time. If we decide to make a material change to our Privacy Notice, we will endeavour to make you aware of that fact by, for example, notifying you of these changes via email and/or posting an alert on the home page of a relevant website and/or take any further action as required by applicable law.

Contact us

If you have any questions about this Privacy Notice and/or about the privacy policies and practices of our service providers, please contact us via email at engage@Utop.io.

This Privacy Notice was updated Aug 15, 2023