

POLICY ON PERSONAL DATA PROTECTION

1. PURPOSE

The Company prioritizes and respects privacy, security and safety of Personal Data. The Company strives to protect Personal Data, the privacy of Personal Data Subjects and comply with Vietnamese laws on Personal Data protection. Therefore, data protection and information security are an integral part of our Company's policy towards Personal Data Subjects.

2. SCOPE

*All individual customers registering to study or use the Products or Services, users of the Company's Digital Platforms, other individuals related to or connected with the relationship of using, providing the Products, Services, or other legal relations in connection with the Products, the Services and Digital Platforms with the Company. This policy on Personal Data protection (the "**Personal Data Protection Policy**") applies to all Personal Data of the subjects contemplated in the preceding sentence processed by the Company.*

3. DEFINITIONS AND ABBREVIATIONS

- "**Services**" means the services provided by the Company.
- "**Personal Data**" means information in the form of symbols, scripts, notebooks, images, sounds or similar forms in the electronic environment attached to a specific person or helping to identify a specific person. Personal data includes Basic Personal Data and Sensitive Personal Data.
- "**Basic Personal Data**" includes: Full name, middle and birth name, other names (if any); date, month, year of birth; date, month, year of death or disappearance; gender; place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown, contact address; nationality; images of individuals; phone number, identity card number, personal identification number, passport number, driver's license number, license plate number, personal tax identification number, social insurance number, health insurance card number; marital status; family relationships (parents, children); Individual's digital account; personal data reflecting activities and history of activities in cyberspace; and other information that relates to a specific person or helps identify a specific person that does not fall under the category of Sensitive Personal Data.
- "**Sensitive Personal Data**" means personal data associated with the privacy of individuals that, when infringed, will directly affect the legitimate rights and interests of individuals, including: Political views, religious views; health status and private life recorded in medical records, excluding information on blood type; information related to ethnic background and ethnic origin; information on inherited or acquired genetic characteristics of the individual; information on the individual's own physical attributes and biological characteristics; information on sex life and sexual orientation of such individual; data on crimes and offenses collected and stored by law enforcement agencies; customer information of credit institutions, foreign bank branches, intermediary payment service providers and other permitted organizations, including: customer identification information as prescribed by law, information on accounts, information on deposits, information on deposited assets, etc., information on transactions, information on organizations and individuals who are guarantors at credit

institutions, bank branches, intermediary payment service providers; data on the location of individuals determined through location services; and other personal data prescribed by law is specific and requires necessary security measures.

- ***"Digital Platforms"*** means digital platforms (including e-commerce websites (if any)) operated and/or owned by the Company.
- ***"Products"*** mean the products produced, provided or distributed by the Company.
- ***"Processing of Personal Data"*** means one or multiple activities affecting Personal Data, such as: collecting, recording, analyzing, confirming, storing, editing, publicizing, combining, accessing, retrieving, withdrawing, encrypting, decoding, copying, sharing, transmitting, supplying, transferring, deleting, and destroying Personal Data.
- ***"Company"*** means Long Duc Investment Company Limited, including its branches, business locations, and representative offices.
- ***"Personal Data Subject"*** means the individual which Personal Data reflects, including all individual customers registering to learn, or use the Products or Services, users of the Company's Digital Platforms, other individuals related to or connected with the relationships of using, providing products, services, or other legal relations in connection with the Products, the Services and Digital Platforms with the Company.

4. GENERAL RULES

4.1 *This Personal Data Protection Policy applies to all Personal Data processed by the Company. The Personal Data Protection Policy once accepted by the Personal Data Subject (in any form in accordance with applicable law) constitutes an agreement between the Personal Data Subject and the Company regarding Personal Data in the process of establishing, maintaining and developing relations and transactions between the Personal Data Subject and the Company.*

4.2 *If any Personal Data of a third party (including but not limited to: information of dependents, legal relatives, spouses, children and/or parents and/or guardians, friends, beneficiaries, authorized persons, partners, emergency contact persons or other relevant individuals of the Personal Data Subject) is provided to the Company, the party/person who provides such third party's Personal Data undertakes, ensures and is responsible that the Personal Data Subject of such Personal Data so provided has given the legal and necessary consent and permission for the party/person providing such Personal Data to provide and share the Personal Data to the Company and for the Company to process his or her Personal Data for the purposes set out in and in accordance with the Personal Data Protection Policy.*

4.3 *Depending on the Company's role in each situation, namely as (i) Personal Data Controller, (ii) Personal Data Processor, or (iii) Personal Data Controller and Processor, the Company shall exercise the respective powers, responsibilities and principles of processing Personal Data in accordance with applicable laws.*

4.4 *The Personal Data Subject understands and agrees that the provision of his or her Personal Data to the Company (including and not limited to the information available to the Company before, during and after the Personal Data Subject's acceptance of this Personal Data Protection Policy) constitutes the Personal Data Subject's full acceptance for the Company to use his or her Personal Data during the process of receiving and processing his or her Personal Data, starting from the time the Company receives the Personal Data until there is a request to terminate the processing from the Personal Data Subject.*

Subject. The Personal Data Subject may withdraw his or her consent to process his or her Personal Data if the Personal Data Subject does not accept this Personal Data Protection Policy, and if so, it is deemed that the Personal Data Subject accepts the consequences of the withdrawal of his or her consent as provided in paragraph (d) of Section 7 hereof.

4.5 In the event of a conflict or inconsistency with the agreements, terms, and conditions governing a Personal Data Subject's relationship with the Company, whether concluded in advance, on, or after the date on which the Personal Data Subject accepts this Personal Data Protection Policy, the Personal Data Protection Policy shall prevail.

4.6 This Personal Data Protection Policy regulates how the Company processes and protects the Personal Data during the Personal Data Subject's use or interaction with the Company's Products, Services and/or Digital Platforms.

4.7 The Company encourages Personal Data Subjects to read these contents carefully and check regularly for updates on any changes that the Company may make in accordance with the provisions set out in this Personal Data Protection Policy. The Company will inform and seek consent of the Personal Data Subject for any changes to this Personal Data Protection Policy.

4.8 By using any Services and/or Products provided by the Company, or accessing any of the Company's websites, applications or devices linked to the Company, the Personal Data Subject is deemed to have fully accepted this Personal Data Protection Policy. The Personal Data Subject agrees and undertakes to apply, coordinate and comply with the Company's Personal Data Protection Policy.

5. COLLECTING PERSONAL DATA

5.1 The Company may collect the Personal Data directly or indirectly at the Personal Data Subject's request or during the course of the Company's provision of any Products or Services to the Personal Data Subject, and from the Personal Data Subjects, third parties (including but not limited to agents, vendors, contractors, partners and any others who provide services to the Company, who collect the Personal Data Subjects' Personal Data and/or perform functions on the Company's behalf, or with whom the Company collaborates, including but not limited to payment service providers, government sources of data, financial services providers, credit bureaus, delivery, marketing and other service partners), the Company's affiliates; or such data may be collected automatically when the Personal Data Subjects use the Digital Platforms, the Products or the Services.

5.2 During the course of the Personal Data Subjects' use of the Digital Platforms and the Company's provision of the Services or Products, the Company may receive Personal Data from the Personal Data Subjects in the following situations:

- (a) when the Personal Data Subjects browse and use the Digital Platforms;
- (b) when the Personal Data Subjects create an account with the Company;
- (c) when the Personal Data Subjects apply for, subscribe to or otherwise use any of the Services, Digital Platforms and/or on the platforms of the Company's affiliates;
- (d) when the Personal Data Subjects submit any form, including application or other forms relating to any of the Products and Services, whether online or otherwise;

- (e) when the Personal Data Subjects enter into any agreement or otherwise provide documents or information in order to make a transaction regarding any of the Products or Services;
- (f) when the Personal Data Subjects activate or use any payment-related functions available on the Digital Platform or provided by the Company's third party service providers;
- (g) when the Personal Data Subjects use any of the features, functions, mini-apps or games available on the Digital Platform or Services;
- (h) when the Personal Data Subjects record any user-generated content which is uploaded on the Digital Platforms;
- (i) when the Personal Data Subjects use the chat function on the Digital Platforms;
- (j) when the Personal Data Subjects subscribe to the Company's publications or marketing collaterals;
- (k) when the Personal Data Subjects enter a competition, promotion or survey;
- (l) when the Personal Data Subjects participate in any activity or campaign on the Digital Platforms;
- (m) when the Personal Data Subjects log in to their accounts on the Digital Platforms or otherwise interact with the Company via an external service or application, such as Facebook or Google;
- (n) when the Personal Data Subjects interact with the Company offline, including through phone calls (which may be recorded), letters, faxes, in-person meetings or when the Personal Data Subjects interact with the Company's outsourced customer service agents;
- (o) when any other user of the Digital Platforms posts any comments on the content the Personal Data Subjects have uploaded on the Digital Platforms or when the Personal Data Subjects post any comments on other users' content uploaded to the Digital Platforms;
- (p) when the Personal Data Subjects provide feedback or submit a complaint to the Company; and/or
- (q) when the Personal Data Subjects provide their Personal Data to the Company for any other reason.

5.3 Depending on the Personal Data Subjects' use of the Digital Platforms and/or interaction with the Products/Services (such as when purchasing the Products/Services and/or logging into the Digital Platforms), the Personal Data Subjects may be asked to provide the Company with certain information. While the Personal Data Subjects can choose not to provide us with certain information, the Personal Data Subjects might not be able to take advantage of many of the Services/Products or Digital Platforms that are provided to the Personal Data Subjects. The Personal Data that the Personal Data Subjects may opt to provide to the Company are as follows:

- (a) identity and profile data, which may include the Personal Data Subject's name, date of birth, gender, username and password, email address, telephone number, interests, and any Personal Data in any photographs or videos or audio recordings that the Personal Data Subject uploads onto the Digital Platforms;
- (b) account and transaction data, which may include the Personal Data Subject's credit card details or debit card details, bank account details, bank statements, delivery/billing address, payments and orders to and from the Personal Data Subject, and other details of Products and Services that the Personal Data Subject have supplied to or purchased through the Company;

- (c) usage data, such as information about how and when the Personal Data Subject uses the Digital Platforms, Products and Services or view any content on the Digital Platforms, as well as websites the Personal Data Subject was visiting before the Personal Data Subject came to the Digital Platforms and other similar statistics;
- (d) marketing and communications data, which may include the Personal Data Subject's interests, survey responses, preferences in receiving marketing materials from the Company and the Personal Data Subject's communication preferences, preferences for particular products or services, as well as the Personal Data Subject's feedback, complaints, chat, email or call history on/in relation to the Digital Platforms, Products or Services; and
- (e) location data (if identified through positioning services), such as when the Personal Data Subjects check for deals near them or the delivery/pick-up status of orders.

5.4 The Company automatically collects and processes certain types of information when the Personal Data Subjects use their devices to access the Digital Platforms and interact with the Products or Services for the purposes set out herein. Examples of such information include views and searches, purchase history, device information or other identifiers, cookies (where applicable) and other functional information for platform performance (e.g., diagnostics, and crash logs).

5.5 The Company or the Company's authorized service providers may use cookies, web beacons, and other similar technologies in connection with the Personal Data Subjects' use or access of the Digital Platforms.

Cookies are small text files (typically made up of letters and numbers) placed in the memory of the Personal Data Subjects' browser or device when the Personal Data Subjects visit a website or view a message. They allow the Company to recognise a particular device or browser. Web beacons are small graphic images that may be included on the Digital Platforms. They allow the Company to count users who have viewed these pages so that the Company can better understand the users' preference and interests.

The Personal Data Subjects may be able to manage and delete cookies through the Personal Data Subjects' browser or device settings. However, certain cookies are required to enable core functionality (such as adding items to your shopping basket), so please note that changing and deleting cookies may affect the functionality available on the Digital Platforms.

5.6 When the Personal Data Subjects visit the Digital Platforms through their computer, mobile device, or any other device with Internet connectivity, the Personal Data Subjects acknowledge and consent that the Company's servers will automatically record data that the Personal Data Subjects' browser sends whenever they visit any of the Digital Platforms, such as the technical data and usage data outlined in Sections 5.3(c), 5.4 and 5.5 above.

This data is collected for analysis and evaluation in order to help the Company improve the Digital Platforms and the Services and Products, as well as to help the Company to personalize the content to match the Personal Data Subjects' preferred interests more quickly. The data is also collected to make the Products/Services and the Digital Platforms more convenient and useful to the Personal Data Subjects, and to provide more relevant advertising related to market products, services and features to the Personal Data Subjects.

5.7 The Personal Data Subjects agree only to submit Personal Data which is accurate and not misleading and to keep it up to date and inform the Company of any changes to the Personal Data that the Personal Data Subjects have provided to the Company. The Company shall have the right

to request documentation and carry out the necessary checks to verify the accuracy of Personal Data provided by the Personal Data Subjects.

5.8 The Company will only be able to collect certain categories of Personal Data if the Personal Data Subjects voluntarily provide the Personal Data to the Company or as otherwise provided for under this Personal Data Protection Policy. If the Personal Data Subjects choose not to provide their Personal Data to the Company or subsequently withdraw their consent to the Company's process of their Personal Data, the Company may not be able to provide the Personal Data Subjects with certain features or functionality on the Products/Services or access to the Digital Platforms.

6. PROCESSING PERSONAL DATA

6.1. PURPOSE OF PROCESSING PERSONAL DATA

In order to provide products and services to Personal Data Subjects and/or handle requests from Personal Data Subjects or improve the quality of the Products, Services and Digital Platforms, the Company may need to collect Personal Data, which may include: (i) Basic Personal Data and (ii) Sensitive Personal Data about the Personal Data Subject and related individuals. Personal Data may be processed by the Company for the following purposes:

- (a) Verify the correctness and completeness of the Personal Data Subject's information; identify or authenticate the Personal Data Subject's identity; and carry out the Personal Data Subject's authentication procedure.*
- (b) Evaluate the legal documents, financial capacity and eligibility of the Personal Data Subject for any Products and Services produced or provided by the Company.*
- (c) Provide Products and Services produced by the Company or provided to Personal Data Subjects (including but not limited to products that third parties coordinate with the Company to provide to Personal Data Subjects in accordance with the law), including processing Personal Data Subjects' orders for any Products/Services, delivery of Products, verifying and carrying out payment transactions and customer support activities;*
- (d) Assess and approve the registration for use of the Digital Platforms of the Personal Data Subjects, improve the user experience and ensure the rights and interest of the Personal Data Subjects when using the Digital Platforms;*
- (e) Promote and inform Personal Data Subjects about Products, Services, promotions, research, surveys, news, updates, events, contests, awarding relevant rewards, communication activities, related introduction of the Digital Platforms, Services and Products of the Company and services of other partners in cooperation with the Company.*
- (f) Contact the Personal Data Subject in order to exchange information, provide documents or other documents related to transactions and the use of Products and Services at the Company.*
- (g) Inform Personal Data Subjects of information about obligations, rights, changes in features, improvements and enhancements of utilities and quality of Products and Services;*
- (h) Prepare operational reports or other related types of reports as prescribed by law;*
- (i) Carry out market research, surveys and data analysis in relation to any Digital Platforms, Products or Services offered by the Company (whether conducted by the Company or another third party with whom the Company cooperates) that may be related to the Personal Data Subject;*

- (j) Protect the legitimate interests of the Company and comply with relevant laws, including but not limited to to collect fees, charges and/or to recover any debts, or handle lawsuits, complaints, investigation or pursuant to any agreement between the Personal Data Subject and the Company;
- (k) Meet and comply with the Company's internal policies, procedures and any rules, regulations, instructions, directives or requirements issued by competent State Authorities in accordance with the law;
- (l) Evaluate any proposal relating to rights, interests or obligations under the contract(s) between the Personal Data Subject and the Company;
- (m) Provide service providers/partners of the Company to perform services for Personal Data Subjects and/or the Company;
- (n) For any other purpose required or permitted by any laws, regulations, guidelines and/or requirements of competent State Authorities; or
- (o) For other purposes related to the Company's business as the Company deems appropriate from time to time, provided that the Company satisfies requirements provided in applicable personal data protection law;

Before using the Personal Data for purposes other than those indicated in the Personal Data Protection Policy, the Company must get consent from the Personal Data Subject.

6.2. COMPANY RIGHTS AND RESPONSIBILITIES

The Company will not sell, exchange, lease (for a term or indefinitely) any Personal Data contrary to the provisions of the Personal Data Protection Policy without the consent of the Personal Data Subject in accordance with applicable laws. However, in order to fulfil the appropriate purposes and activities of processing Personal Data, the Company may share/disclose Personal Data of the Personal Data Subject in the following cases:

- (a) *Sharing to employees/Departments within the Company and/or its affiliates (including but not limited to its parent company) to conduct the Company's business to the extent consistent with the provisions of this Personal Data Protection Policy and to perform contracts and agreements concluded between the Personal Data Subject and the Company;*
- (b) *Sharing with competent State agencies having jurisdiction over the Company or any management agencies or organizations/individuals that the Company is permitted or required to disclose in accordance with relevant laws/regulations;*
- (c) *Sharing with organizations and individuals involved in developing, maintaining, providing the Digital Platforms, Products and Services or improving the quality of the Digital Platforms, Products and Services for Personal Data Subjects;*
- (d) *Sharing with organizations and individuals involved in the implementation or maintenance of any rights or obligations under the agreement(s) between the Personal Data Subject and the Company;*
- (e) *Sharing with third parties to whom the Personal Data Subject consents/designates or the Company has a legal basis for sharing the Personal Data.*

6.3. OVERSEAS TRANSFERS OF PERSONAL DATA

In case of provision/sharing of Personal Data abroad, the Company shall:

- (a) Enter into a contract with the recipient of such Personal Data to ensure that the Personal Data transferred to them will be kept confidential and safe.
- (b) Ensure compliance with legal obligations and relevant regulations related to the transfer of Personal Data.

7. RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS WITH RESPECT TO PERSONAL DATA

- (a) Personal Data Subjects shall have the following rights in accordance with applicable personal data protection regulations:
 - ✓ Right to know;
 - ✓ Right to consent;
 - ✓ Right of access;
 - ✓ Right to withdraw consent;
 - ✓ Right to erasure of data;
 - ✓ Right to restrict of data processing;
 - ✓ Right to data provision;
 - ✓ Right to object to processing;
 - ✓ Right to complain, denounce and initiate lawsuits;
 - ✓ Right to claim damages;
 - ✓ Right to self-protection.
- (b) Subject to paragraphs (d), (h) and (i) of Section 7, Personal Data Subjects may exercise their rights by accessing their accounts on the Digital Platforms and/or contacting the Company using the contact details in Section 11. The Personal Data Subject understands and agrees that it will not exercise any of the above rights if the exercise of such right by the Personal Data Subject damages or effects or may result in damage/prejudice to the activities and/or interests of the Company.
- (c) The Personal Data Subject understands and agrees that:
 - The Company shall only comply with the Personal Data Subject's request if (i) such request is given within the period consistent with the provisions of law, (ii) the Personal Data Subject's request is lawful, complete and valid, and (iii) the Personal Data Subject pays the costs incurred (if any).
 - The right of the Personal Data Subject hereunder shall be subject to the Company's right to invoke any exemptions and/or exceptions provided by law.
- (d) The Personal Data Subjects may withdraw his/her consent to process and request deletion with respect to any or all Personal Data in writing using the contact details in Section 11, subject to the conditions and/or limitations imposed by applicable laws or regulations. Withdrawal of the Personal Data Subject's consent shall not affect the lawfulness of the processing that was conducted prior to this withdrawal. Depending on the nature of the Personal Data Subject's request, the Company may consider and decide on the

discontinuation of the Company's provision of its Products and Services to such Personal Data Subject due to the inability to ensure the standards/quality of Products and Services as assessed by the Company or due to the provisions of law that it is necessary to collect Personal Data when providing Products and Services. In case the Company decides not to provide Products or Services to the Personal Data Subject, the acts performed by the Personal Data Subject in accordance with this paragraph shall be considered as unilateral termination on the part of the Personal Data Subject for any relationship between the Personal Data Subject and the Company. If such termination of the relationship between the Personal Data Subject and the Company may lead to a breach of obligations or commitments under contracts or agreements between the Personal Data Subject and the Company, then the Company reserves the legal rights and remedies arising therefrom. The Company shall not be liable to the Personal Data Subject for any loss (if occurring), and its legal rights shall be expressly reserved. Personal Data Subjects should note that, due to the characteristics of the Company's activities, the law stipulates that the Company must keep storing Personal Data in certain cases, in which case the Company cannot respond to the Personal Data Subject's request to delete his or her Personal Data to the extent to comply with the law.

- (e) *Personal Data Subjects are responsible for protecting their Personal Data themselves, requesting other relevant organizations and individuals to protect their Personal Data. At the same time, Personal Data Subjects must respect and protect the Personal Data of others.*
- (f) *Provide full and accurate Personal Data to the Company when entering into contracts or using, purchasing Services, Products provided by the Company.*
- (g) *Implement and comply with the provisions of the law on Personal Data protection and participate in preventing and combating violations of regulations on Personal Data protection.*
- (h) *In case of changes or adjustments to Personal Data, Personal Data Subjects are responsible for updating their Personal Data by accessing their account on the Digital Platforms and/or contacting and immediately notifying the Company using the contact details in Section 11 so that the Company can promptly update such changes and adjustments. The Personal Data Subjects shall be fully responsible for the delay in such update/notification; at the same time, the delay in such update/notification from the Personal Data Subjects will exempt the Company from all damages and risks incurred by the Personal Data Subjects and related parties (if any).*
- (i) *The Personal Data Subjects may request information about their Personal Data which the Company collected, or enquire about the ways in which their Personal Data may have been used, disclosed, stored or processed by the Company via the personal account information setting on the Digital Platforms or by contacting the Company using the contact details in Section 11 below. In order to facilitate processing of the Personal Data Subjects' request, it may be necessary for the Company to request further information and documents relating to the Personal Data Subjects' request. Where permitted by applicable data protection regulations, the Company reserves the right to charge a reasonable administrative fee for retrieving the Personal Data Subjects' Personal Data records. If so, the Company will inform the Personal Data Subjects of the fee before processing the Personal Data Subjects' request. In certain cases as provided under applicable data protection regulations, the Company may refuse to provide Personal Data as requested.*

8. PERSONAL DATA SECURITY MEASURES

- (a) *The Company considers the client's Personal Data important information of the Company and the Company ensures confidentiality, safety, compliance with the law, limitation of consequences, and potential damages (including but not limited to: data leakage or inappropriate data processing that harms legitimate rights and interests of the Personal Data Subject).*
- (b) *The Company carries out its responsibility to protect Personal Data in accordance with applicable laws with best security practices and regularly reviews, and updates managerial and technical measures when processing Personal Data.*
- (c) *The Personal Data Subjects should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure (for example, in the cases of unauthorized disclosure arising from malicious hacking or sophisticated cyber-attacks by bad actors through no fault of the Company).*

9. THE STORAGE OF PERSONAL DATA

The Company stores, manages and secures all Personal Data (i) in case of physical documents, in locked file cabinet systems to ensure that such documents are not seen by persons who are not authorized to access and (ii) in case of electronic data, in folders to which only authorized persons are permitted to access.

The Company stores the Personal Data for the period necessary to fulfill the purposes in accordance with the agreements, contracts, and/or any other documents the Personal Data Subject has signed with the Company and also in accordance with this Personal Data Protection Policy, unless the retention period of Personal Data is longer in accordance with applicable laws.

10. AMENDMENTS

The Company may amend, supplement or adjust the terms of this Personal Data Protection Policy from time to time and ensure its amendments and additions are in accordance with the relevant provisions of law. Any amendments, additions, updates or corrections will be updated, posted on the Company's website: <https://longduc-ip.com.vn>., the Company's e-commerce website(s) and application and/or notified to the Personal Data Subject through other means of communication as the Company deems appropriate.

To the extent permitted by applicable law, the Personal Data Subject's continued use of the Company's Services and Products means that the Personal Data Subject agrees to the updated contents of the Personal Data Protection Policy.

11. CONTACT INFORMATION FOR PROCESSING OF PERSONAL DATA

In case the Personal Data Subject has any requests or questions related to the Personal Data Protection Policy. Please contact the Head Office of the Company via phone number: +84 251 3201 032, email address: marketingsection@longducip.com

12. EFFECTIVENESS

The Personal Data Protection Policy is effective from the date of release.