

**PERSONAL DATA PROTECTION POLICY
OF GELEX GROUP JOINT STOCK COMPANY**

*(Issuance based on the Regulation on Personal Data Protection of
GELEX Group Joint Stock Company attached to Decision No 70/2024/GELEX/QĐ-TGD
date 30/10/2024 of General Director of GELEX Group Joint Stock Company)*

I. DECLARATION AND GENERAL TERMS

1. GELEX Group Joint Stock Company (“**GELEX**”) respectfully notifies that the Personal Data Protection Policy (“**Policy**”) is issued by GELEX and shall take effect from 30/10/2024 based on the Regulation on Personal Data Protection of GELEX Group Joint Stock Company attached to Decision No 70/2024/GELEX/QĐ-TGD date 30/10/2024 of General Director of GELEX Group Joint Stock Company.

This Policy shall be publicly announced and updated periodically on GELEX's official website for Data subjects, partners, and clients, organizations, individuals engaged in work, cooperation, and information exchange with GELEX (collectively referred to as “**Clients**”) to proactively understand and comply with when they provide information to GELEX.

GELEX confirms that, from the perspective of the Data Controller or the Data Controller cum Processor, GELEX shall strictly comply with laws and respect the legitimate rights of Data subjects in the protection of personal data. Within the scope of this Policy, GELEX provides information and regulations that Clients need to know regarding the collection and processing of personal data before Clients provide any personal data or exercise their rights of consent as Data subjects or on behalf of Data subjects.

2. Other than this Policy, GELEX has issued a Regulation on personal data protection with more detailed and comprehensive content, which serves as the foundation for GELEX to implement any data control and processing activities and the basis for developing this Policy. The terms, definitions, and references in this Policy are stipulated according to Vietnamese law, including Decree 13/2023/ND-CP issued by the Government and any detailed guiding documents, amendments, supplements, or replacements issued from time to time (“**Decree 13/2023**”).
3. By registering for and using GELEX's products and services, establishing agreements/contracts with GELEX, and/or allowing GELEX to use personal information and process personal data, Clients fully accept all provisions provided in this Policy.
4. When Clients provide GELEX with the personal data of other Data subjects, Clients ensure that they have fully informed those Data subjects about the contents of this Policy and obtained Data subjects’s consents to this Policy and GELEX's processing of personal data for purposes stated herein. At the same time, Clients acknowledge and agree that GELEX shall have no obligation to verify or revalidate these consents.

II. PRINCIPLE OF PERSONAL DATA PROTECTION

1. Data subjects are informed about activities related to the processing of their personal data, unless otherwise provided by laws.

2. Personal data shall only be processed for the purposes specified by the Data Controller, Data Processor, Data Controller cum Processor, or third parties that have registered or declared the processing of personal data.
3. Collecting of Personal data shall be relevant and limited to the scope and purposes necessary for processing. Personal data shall not be bought or sold in any form unless otherwise provided by laws.
4. Personal data shall be updated and supplemented in accordance with the processing purposes; protective and security measures shall be applied during processing, including protection against violations of personal data protection regulations and prevention of loss, destruction, or damage due to incidents. Technical measures must be used, and data should only be retained for a duration appropriate to the processing purposes unless otherwise provided by laws.
5. In cases GELEX is involved in the processing of personal data or acts as the Data Controller or Data Controller cum Processor, Gelex shall comply with the principles of personal data processing as provided in this Section.
6. In the event that GELEX designates a Data Processor as an organization or individual to process personal data on behalf of GELEX (the Data Controller), the Data Processor shall comply with the provisions of this Policy, the principles of personal data processing provided in this Section and Article 3 of Decree 13/2023, and demonstrate their compliance with these processing principles upon request by GELEX.
7. Any organization or individual that has a partnership, cooperation, work relationship, or exchange with GELEX and participates in the processing of personal data, acting either as a Data Controller Data Controller cum Processor, shall be obligated and responsible to comply with the principles of personal data processing as provided in Article 3 of Decree 13/2023. Upon GELEX's request, providing evidence of their compliance with these data processing principles.
8. GELEX encourages the aforementioned organizations and individuals to comply with the provisions set forth in this Policy.

III. TYPE OF PERSONAL DATA

GELEX directly or indirectly, through another Data Processor (if applicable), processes the following types of personal data:

1. Basic personal data

- a. Last name, middle name and first name, other names (if any);
- b. Date of birth; Date of death or date of missing;
- c. Gender;
- d. Place of birth, place of birth registration, permanent residence, temporary residence, current address, place of origin, contact address;
- e. Nationality;
- f. Personal image;
- g. Phone number, ID card number, personal identification number, passport number, driver's license number, vehicle registration number, personal tax identification number, social insurance number, health insurance card number;

- h. Marital status;
- i. Information about family relationships (parents, children);
- j. Information about an individual's account number; personal data reflecting online activities and activity history in cyberspace;
- k. Other information related to a specific individual or that helps to identify a specific individual not covered by the provisions in paragraph 2 of this Section.

2. Sensitive personal data

- a. Political point of view, religious beliefs;
- b. Health conditions and personal life recorded in medical records, excluding blood type;
- c. Information related to racial origin, ethnic origin;
- d. Biometric data, genetic data;
- e. Physical attributes or unique biological characteristics;
- f. Sexual life and sexual orientation;
- g. Criminal records;
- h. Customer information of credit institutions, branches of foreign bank, organizations providing payment intermediary service, and other authorized entities, including customer identification information as required by law, account information, deposit information, information regarding pledged assets, transaction details, and information concerning organizations or individuals acting as guarantors at credit institutions, bank branches, or organizations providing payment intermediary service;
- i. Location data of an individual as determined through location-based services;
- j. Other personal data classified by law as sensitive require appropriate security measures.

IV. PURPOSES OF PERSONAL DATA PROCESSING

GELEX processes personal data for the following purposes:

1. To compile and assess before establishing relationships, agreements, transactions, or contracts with Clients.
2. To identify, verify, and maintain accurate customer identification information; ensure the security and safety of GELEX's information systems; and comply with customer due diligence requirements as stipulated by applicable laws.
3. To fulfill the obligations under the contract or agreement between GELEX and the Clients (if applicable)
4. Risk assessment, trend analysis, statistic, and planning including data processing analysis related to statistics, credit, and anti-money laundering.
5. To detect, prevent, and investigate crimes, attacks, or violations, including but not limited to fraud, money laundering, terrorism, proliferation of weapons of mass destruction, bribery, corruption, or tax evasion.
6. To provide the competent authorities with information, disclose relevant data, and establish related databases in accordance with applicable laws.

7. To comply with and demonstrate GELEX's compliance with applicable legal requirements, including but not limited to laws regarding public companies, tax laws, anti-money laundering regulations, data retention requirements, and regulations related to disputes or litigation.
8. To carry out management, inspection, supervision, and ensure compliance with integrity and non-competition,... of GELEX.
9. Other purposes in compliance with laws.

V. METHODS OF PROCESSING PERSONAL DATA

Depending on the purpose of processing personal data, GELEX or Data processor or third parties authorized to process data on behalf of GELEX may apply appropriate processing methods, including but not limited to: collection, recording, analysis, verification, storage, modification, disclosure, combination, access, retrieval, withdrawal, encryption, decryption, duplication, transmission, provision, transfer, deletion, destruction, or other related actions. The methods used for processing personal data by GELEX may be automated, manual, or other methods deemed suitable in compliance with the laws and regulations applicable to GELEX from time to time.

VI. RIGHTS AND OBLIGATION OF DATA SUBJECTS

1. Rights of Data subjects

GELEX shall comply with legal provisions regarding the rights of Data subjects in relation to all and any personal data that GELEX acts as the Data Controller or the Data Controller cum Processor, including:

- a. Right to be informed: The Data subjects have the right to be informed about the processing of personal data, unless otherwise provided by law.
- b. Right to consent: The Data subjects have the right to either consent to or withhold consent for the processing of their data through a clear and specific expression, which may include written or verbal confirmation, ticking a consent box, agreeing via message syntax, selecting consent through technical settings, or any other action that demonstrates such consent. Silence or failure to respond from the data subject shall not be considered as consent.
- c. Right of access: The data subjects have the right to access, review, or request the correction of personal data, unless otherwise provided by law.
- d. Right to withdraw consent: The Data subjects have the right to withdraw their consent unless otherwise provided by law.
- e. Right to erasure: The Data subjects have the right to erase or request the deletion of personal data, unless otherwise provided by law.
- f. Right to restriction of processing: Data subjects have the right to request the restriction of the processing of personal data, unless otherwise provided by law. Such restriction of processing shall be implemented within 72 hours of the Data subject's request, for all personal data for which the data subject has requested restriction unless otherwise provided by law.

- g. Right to data portability: The Data subjects have the right to request that the Data Controller or the Data Controller cum Processor provide personal data provided, unless otherwise provided by law.
 - h. Right to object to processing: The Data subjects have the right to object to the Data Controller or the Data Controller cum Processor processing personal data to prevent or restrict the disclosure of personal data or use for advertising or marketing purposes unless otherwise provided by law. The Data Controller or the Data Controller cum Processor shall comply with the Data subject's request within 72 hours of receiving the request unless otherwise provided by law.
 - i. Right to complain, report, or take legal action: The Data subjects have the right to complain, report a violation, or take legal actions as provided by laws.
 - j. Right to seek compensation for damages: The Data subjects have the right to seek compensation for damages as provided by laws in the event of a violation of the regulations concerning the protection of their personal data, unless otherwise agreed by the parties or provided by law.
 - k. Right to self-defense: The Data subjects have the right to self-defense in accordance with the Civil Code, and other applicable laws, or to request competent authorities to take measures to protect their civil rights as prescribed by law.
2. Obligations of Data subjects
 - a. Self-protect personal data; request other relevant organizations or individuals to protect personal data.
 - b. To respect and protect the personal data of others.
 - c. To provide complete and accurate personal data when consenting to the processing of their personal data.
 - d. To participate in promoting and disseminating skills for protecting personal data.
 - e. To comply with the legal regulations on personal data protection and participate in preventing and addressing actions that violate the regulations on personal data protection

VII. DURATION FOR PERSONAL DATA PROCESSING, DELETION, AND DISPOSAL

1. The data processing period shall commence when GELEX begins to receive and/or collect personal data.
2. The data processing period shall conclude when GELEX completes the processing of personal data, depending on the type of data, the purpose of processing, and the specific processing activities, while ensuring compliance with applicable laws.
3. Personal data shall be deleted or destroyed in the following cases:
 - a. Upon the expiration of the processing period specified in paragraph 2 of this Article, unless otherwise required by law;
 - b. By the agreement with the Clients in the Contract, Agreement, or signed documentation;
 - c. Under a decision made by GELEX;

- d. Following legal provisions and/or mandatory requirements of competent authorities.

VIII. PROVISION OF PERSONAL DATA

The Clients agree that GELEX may consider sharing the personal data provided by the Clients with organizations or individuals as follows, for the purposes provided in Section IV of this Policy:

1. Any subsidiaries of GELEX; affiliates, joint ventures determined by GELEX from time to time.
2. Local or foreign organizations or individuals providing personal data processing services.
3. Competent authorities as provided by law.
4. Organizations or individuals providing insurance services, insurance brokerage for employees, and the management and operation of buildings, offices, and hotels owned or managed by GELEX.
5. Credit institutions that maintain a relationship with GELEX.
6. Individuals within GELEX are involved in governance, management, and operations.
7. Partners and clients for information verification and fulfillment of commitments, based on the understanding that such partners and clients have agreed to confidentiality terms with GELEX.
8. Other relevant parties deemed necessary by GELEX to ensure the protection and fulfillment of the lawful rights and interests of the Data subjects.
9. GELEX's advisors/consultants include accountants, auditors, lawyers, financial consultants, and other relevant professionals,...
10. Other organizations or individuals, based on compliance with applicable laws and the consent of the Clients.

IX. POTENTIAL RISKS AND GOVERNANCE MEASURES

1. GELEX recognizes the importance of privacy and is committed to ensuring the security and protection of the personal data of Data subjects in full compliance with applicable data protection laws, and to implementing measures aimed at mitigating or eliminating any potential adverse consequences or damages arising from the unauthorized disclosure or breach of personal data.
2. The Clients acknowledge and agree that the provision of, and consent to GELEX's use and processing of personal data entails certain inherent risks, including but not limited to the possibility of data leakage or improper or delayed processing, which may arise from causes such as system failures, transmission errors, force majeure events, viruses, cyberattacks, hardware or software malfunctions, or actions or omissions by GELEX's personnel or any third party, all of which may impact the provision and processing of personal data.
3. Potential risks may arise, including but not limited to the unauthorized disclosure or theft of personal data by a third party, which could result in such data being exploited for unlawful purposes, such as unsolicited marketing, fraud, coercion, or other illegal

activities beyond GELEX's control, thereby causing both tangible and intangible harm or loss.

4. Measures to mitigate or rectify the consequences and damages arising from the unauthorized disclosure of personal data:
 - a. Notify relevant parties of the breach upon discovering the personal data leakage.
 - b. Report to the competent authorities for prevention and resolution of the incident.
 - c. Make efforts to implement remedial measures to mitigate the consequences.
 - d. Other measures as deemed appropriate for the specific circumstances.

X. EFFECTIVE DATE

1. This Policy shall take effect from the date of signing.
2. Any matters not provided in this Policy shall be governed by the laws and internal regulations of GELEX.
3. In the event of any discrepancy between the provisions of this Policy and the laws, the provisions of the applicable law shall prevail.
4. The Clients acknowledge and agree that, GELEX may amend, update, or modify the provisions of this Policy at any time without prior consent from the Clients.

GELEX GROUP JOINT STOCK COMPANY

GENERAL DIRECTOR

(signed)

Nguyen Van Tuan