

PERSONAL DATA PROTECTION POLICY

REFICO GROUP

| No. | Personal Data Protection Policy | Remark |
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I. Introduction

We, R.C Real Estate Development and Finance Corporation and its Affiliates, (hereinafter collectively referred as “**Refico**”, “**Refico Group**”, “**we**”, “**us**” or “**our**”) are a group of real estate development companies operating in Vietnam, with our main office located in Ho Chi Minh City. Our core business involves the development, sales, and leasing of residential and commercial facilities in Vietnam. You can view our developments on our [website](#)¹.

Refico, like many other organizations, may face significant harm if its information is used adversely or without authorization. The risks associated with compromising Refico’s information systems are substantial. Such incidents could harm not only Refico but also its stakeholders, including employees and customers. These risks are heightened by the fact that Refico, as a real estate group, is subject to strict confidentiality and protections, both legally and ethically. If the security of Refico’s information, customer data, or any work product is compromised, it could cause severe harm to customers and result in significant reputational damage to Refico.

Refico is dedicated to protecting its stakeholders, including employees and customers, as well as itself from any damaging acts, whether intentional or unintentional, that may affect Refico’s information, information processing facilities, and information infrastructure. To this end, Refico has adopted this Personal Data Protection Policy (the “**Policy**”). The Policy addresses, among other things, Refico’s information security management system and has been formulated to balance the need for security with the business exigencies of Refico as a reputable real estate developer. This Policy not only imposes requirements on employees and external parties but also sets out specific goals that Refico aims to achieve to protect confidentiality, maintain integrity, and ensure the availability of all Personal Data. While these goals do not impose specific commitments and obligations on Refico, they reflect the overall intent and ambition of Refico, which Data Subject are made aware of through the Policy.

Effective security is a team effort that requires the participation and support of every user interacting with Refico’s information and systems. Therefore, it is the responsibility of each user to understand these policies and conduct their activities accordingly. While it is impossible to legislate for every possible outcome and risk, this Policy sets specific standards and requirements based on best practices. Employees and external parties are expected to commit not only to this Policy but also to its underlying intent.

A core principle is that Refico aims to implement adequate security policies, procedures, and controls to achieve the purposes of this Policy through its information systems. These controls

¹ <https://refico.com.vn/> or as updated from time to time.

and safeguards are designed to mitigate potential threats and ensure accountability for Refico's information. The key purposes of this Policy include: (a) **Confidentiality**: ensuring that access to the Personal Data is restricted to authorized users and services, preserving restrictions on Personal Data access and disclosure; (ii) **Integrity**: ensuring that Sensitive Personal Data has not been modified, deleted, or undeleted in an unauthorized manner; (iii) **Availability**: ensuring timely and reliable access to and use of information.

This Policy delineates our commitment to adhering to the principles, guidelines, and requirements set forth in Decree No. 13/2023/ND-CP on Personal Data Protection issued by Vietnamese Government on 17 April 2023, valid from 01 July 2023 (“**Decree 13**”), along with all relevant and applicable regulations of Vietnam, as amended from time to time.

*** It's worth noting that:

1. Security measures must be implemented to protect against unauthorized access, alteration, disclosure, or destruction of information and information systems. These measures also guard against accidental loss or destruction.
2. For the avoidance of doubt, any approval or consent required by this Policy must be provided in writing and obtained before the occurrence of the related event, conduct, or act; and
3. In addition to this Policy, employees (and, where applicable, external parties) must ensure compliance with any ethical or legal obligations that exceed the requirements of this Policy.

This Policy is part of Refico's internal policies and may be amended, varied, or replaced from time to time at Refico's sole discretion. Additionally, any goals set forth in this Policy may be achieved within a timeline determined or adjusted by Refico. This Policy does not grant any rights to third parties (including, for clarity, external parties). The term “right” is used in the context of information technology language and not with any legal meaning. Nothing in this Policy constitutes, nor should it be construed as, a representation or promise of any kind to any person.

If you have any concerns regarding the content of this Policy, or if you have any request regarding the collection, processing, updating, revising or deletion of any data or information covered by this Policy, and/or report any violations, please contact us using the details provided below or on our website as updated from time to time:

OFFICE HOURS**9 A.M. – 6 P.M. (GMT+7)**Tel: [\(84-28\) 3822 9290](tel:(84-28)38229290)Fax: [\(84-28\) 3822 9288](tel:(84-28)38229288)Email: info@refico.com.vnWebsite: <https://refico.com.vn>**HEAD OFFICE****R.C. REAL ESTATE DEVELOPMENT
AND FINANCE CORPORATION**Level 35, The Nexus
3A-3B Ton Duc Thang Str., Ben Nghe Ward,
District 1, HCMC, Vietnam

This Policy includes the following parts:

- (i) Introduction – Page 1 to Page 4;
- (ii) Personal Data Protection Policy – Page 5 to Page 15;
- (iii) Appendix 1: the

II. Personal Data Protection Policy

1. Definitions:

For the purposes of this Policy, the following terms have meaning as follows:

- (i) **“Affiliates”** means the affiliates of Refico, the list and details of which are specified in Appendix 1 herein.
- (ii) **“Personal Data”** means any information or data that is about any individual, or from which any individual is identifiable.
- (iii) Any reference to **“process, processed or processing”** in this Policy means anything that is done with any Personal Data subject to the Applicable Law, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- (iv) **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or any other information that may be deemed to be sensitive under Applicable Law.
- (v) **“Data Subject”** means an individual to whom the Personal Data relates.
- (vi) **“Applicable Law”** means Decree 13 any applicable laws of Vietnam relating to personal data protection and any replacement legislation coming into effect from time to time.
- (vii) **“Decree 13”** has the meaning as set out in the sixth paragraph of Section 1.
- (viii) **“Policy”** has the meaning as set out in the third paragraph of Section 1.

2. Processing of Personal Data

- 2.1 We may collect Personal Data from you, which may include Personal Data for our processing purposes as described in this Policy. This data shall be secured using the mechanisms provided in Section 4 below.
- 2.2 We collect Personal Data about and/or in relation to you from a variety of sources, including but not limited to the following:

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- (i) When you (or an authorized person) correspond with our employees, sub-contractors, customer service, or marketing representatives via telephone, letter, email, face-to-face meetings, etc.
 - (ii) When you respond to our promotions, or being referred to us by business partners, corporate customers, or other third parties.
 - (iii) When we lawfully obtain information about you from third parties who provide it to us in relation to the products and services you have applied for, in such case the third party will be responsible for making you aware of this Policy as and when appropriate.
 - (iv) During the recording of CCTV footage when you visit our outlets and premises
 - (v) When you visit our websites and other websites we own or manage, through the use of technologies such as cookies (either by us or by third parties), or when you engage in contracts with us or third parties via our websites or download and/or use any of our application programs and/or software.
 - (vi) When you disclose personal data to us or submit forms whether by registering for an account on our website(s), engaging in contracts, registering for mobile application(s), via email, through physical collection, or by other methods; and/ or
 - (vii) When you (or any person authorized by you) provide us with personal data for any other reason.
 - (viii) When we collect your Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profiles to the extent that you choose to make your profile publicly visible) and publicly available data sources.

2.3 The categories of Personal Data about and/or in relation to you that may be collected by us subject to the Applicable Law include, but are not limited to, the following:

- (i) personal identify information, such as last name, middle name, first name, other names, address, email address, bank account details, date of birth, date of death or going missing, gender, place of birth, nationality, national registration identification or passport number, photos, visual images, video or voice recordings.
- (ii) contact details, such as permanent residence, temporary residence, current residence, hometown, mailing addresses, email addresses, and telephone numbers, emergency contacts.
- (iii) personal licenses, such as ID card number, personal identification number, passport number, driver's license number, plate number, personal tax code, social insurance number, medical insurance card number.
- (iv) marital status.

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- (v) information about family relationships, such as the name and contact details of parents, children, other members in your family and dependents.
 - (vi) electronic identifying data, such as IP addresses, cookies, activity logs, online identifiers, unique device identifiers, and geolocation data; and
 - (vii) payment-related details and information; and other information provided via forms, face-to-face communication, phone, email, online interactions, use of our website or app, or otherwise.
 - (viii) employment details, such as industry, role, business activities, name of current and former employees, work address, personal particulars, education and qualifications, employment history, salary and allowances, etc.
 - (ix) financial details, such as billing address, bank account numbers, accountholders name and details, transaction details and counterparty details.
 - (x) views and opinions including any views and opinions that you choose to send to us or publish about us (including on social media platforms).

*** It's worth noting that:

- (1) this Policy informs you of (i) the purposes for which your Personal Data may be processed; (ii) how and why the Personal Data may be transferred or disclosed; (iii) the method of Personal Data processing; (iv) other organizations and individuals permitted to process your Personal Data; (v) the rights and method to request access to the Personal Data, and (vi) the rights and obligations of you related to your Personal Data.
- (2) when we collect the Personal Data under the methods of collection identified in this Policy and for the purposes identified under this Policy, processing for the Personal Data, the purpose for which, type of your Personal Data to collect, other organizations and individuals permitted to process your Personal Data and the rights and obligations of you related to your Personal Data have been deemed as having notified by us to you.
- (3) collection of Personal Data may be obligatory or voluntary depending on the purpose for which the Personal Data is processed.
- (4) in case of the processing of your Sensitive Personal Data, you shall receive notification of thereof.
- (5) you are required to sign in the form as may be notified by us in accordance with the Applicable Law before collection of your Personal Data, through which processing of Personal Data and the purpose for which have been deemed to have been consented by you.

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- 2.4 ***Personal Data of Third Parties***, by providing us with Personal Data of third parties, you represent that you have the valid authority to do so and must ensure that they understand how their Personal Data will be used, in such case, you shall be responsible for informing those third parties that their Personal Data has been transferred to us and for informing them that this Policy will be applied. You are also responsible for the collection and recording of their consent, if necessary.
- 2.5 ***Sensitive Personal Data***, we do not seek to collect or otherwise process your Sensitive Personal Data, except in the following circumstances:
- the processing is necessary for reasons of substantial public interest and occurs based on Applicable Law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.
 - we have, in accordance with Applicable Law, obtained your explicit consent prior to processing your sensitive personal data (this legal basis is only used for processing that is entirely voluntary and not for processing that is necessary or obligatory in any way).
 - the processing is necessary for compliance with legal and regulatory obligations under Applicable Law.
 - the processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by Applicable Law.
 - you have manifestly made those sensitive personal data public; or
 - the processing is necessary for the establishment, exercise, or defense of our legal rights.
 - the processing is necessary for compliance with the contractual obligations in connection with any contract that you may enter into with us.
- 2.6 ***State Secrets***, we do not intend to collect any information regarding state secrets as covered under Decree No. 26/2020/ND-CP issued by the Vietnamese Government on 28 February 2020, effective from July 1, 2020, and other relevant legal documents, as updated from time to time. You must ensure that no information provided to Refico falls within the scope of or relates to any state secrets. If you have provided Refico with any information classified as state secrets, you hereby indemnify Refico and any of its related employees from all responsibilities and any damages related to the collection, storage, management, and deletion of such information.
- 2.7 The purposes for which we and/or our service providers may process your Personal Data subject to Applicable Law include but are not limited to, the following:

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- providing services to you and fulfill our contractual obligations.
 - executing transactions as outlined in our agreements, including the sale, purchase, and transfer of ownership of units in our projects, and to provide related services and privileges.
 - marketing, promoting, improving, and expanding our services, either directly or through affiliates, partners, contractors, or third-party service providers.
 - keeping you informed about services and products offered by us or our related entities, affiliates, and partners.
 - conducting training and improving our service quality, marketing, and advertising strategies.
 - enhancing your user experience and the products and services we provide.
 - seeking professional advice, including legal advice, and to enforce your obligations and our rights, including debt collection and defending our rights and interests.
 - conducting investigations or acts related to bad debts, crime and fraud prevention, detection and prosecution, risk management, and violations of our terms and conditions, or to prevent harm, illegal, or unlawful activities.
 - sharing information with selected related entities, affiliates, and business partners for market research, planning, customer surveys, trend analyses, and other data analytics to better tailor offers and promotions.
 - assessing, processing, and responding to your inquiries, requests, feedback, questions, instructions, or complaints, and to perform other customer care activities.
 - verifying your identity and/or the identities of related persons, and to process orders and applications for services.
 - providing complementary or value-added services, and to offer and administer customer loyalty programs, rewards, promotions, contests, and other benefits;
 - conducting market research, planning, customer surveys, trend analyses, and other data analytics.
 - physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems).
 - employment-related records are kept for a range of appointments and human resource management purposes, including postings and transfers, training and career development, performance appraisal and promotion, discipline, offer of benefits, etc.
 - investigations including detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with Applicable Law.
 - compliance with our legal and regulatory obligations under Applicable Law; and
 - establishing, exercising and defending legal rights.

*** It's worth noting that:

- (1) unless otherwise permitted by Applicable Law, we will seek your explicit written consent for processing your Personal Data through appropriate format and manner as may be notified by us to you in accordance with Applicable Law. By providing such consent, you confirm that you are over 18 years of age and have the legal capacity to give valid consent. If you provide information about another individual (e.g., an employee or child), you confirm that you have the authority to consent on their behalf.
- (2) you may withdraw your consent to our processing of your Personal Data at any time by sending a written opinion to us by using the contact details provided on our website and/or this Policy, as amended from time to time. It is noted by you that:
 - (i) we may be unable to provide you with our services or fulfill any contractual obligations we have with you. Consequently, if such consent is essential for the provision of our services, we may cease to provide those services and reserve the right to terminate any service contract with you at our discretion, without liability.
 - (ii) notwithstanding any withdrawal of consent, unless otherwise agreed by Refico, you will remain bound by any existing contracts with us.
 - (iii) should you choose to terminate the relevant contract(s), early termination fees, liquidated damages, or other contractual consequences may apply in accordance with the terms of the relevant contract(s) or Applicable Law, Refico or any member of Refico Group reserves the right to enforce these terms; and
 - (iv) upon legitimate receipt of your request, we shall handle your withdrawal request within a reasonable time (depending on the complexity of the request and its impact on our relationship with you) but in compliance with Applicable Law.
- (3) For direct marketing, we may process your Personal Data to contact you, primarily by mail and on occasion by telephone, provided that we have first obtained your consent, to the extent required by, and in accordance with Applicable Law. If you do not wish to receive marketing communications from us you can opt out at any time by contacting your regular Refico contact, or by electronically unsubscribing from emails we have sent to you. After you unsubscribe, we will

not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any services you have requested.

3. Management and Security of Personal Data

3.1 **Classification.** All Personal Data produced and collected by Refico is classified according to its sensitivity as follows:

- (i) **Confidential**: All Personal Data identified as confidential is accessible only to those authorized by legitimate authorized personnel in accordance with this Policy and Applicable Law, where legitimate access is required for the performance of their obligations.
- (ii) **Restricted**: All Personal Data identified as restricted is accessible to employees of the Refico Group and/or third parties, where legitimate access is required and authorized by legitimate authorized personnel for the performance of their obligations in accordance this Policy and Applicable Law.
- (iii) **Public**: All Personal Data that is available to be accessed by the parties and can be provided upon request to legitimate authorized personnel in accordance with this Policy and Applicable Law.

3.2 **Storage.** All Personal Data is stored by Refico in the following formats:

- (i) hard copy form: stored in Refico offices; and
- (ii) soft copy form: stored on Refico's SharePoint and any other platform with global security standard as might be designated by Refico from time to time in compliance with Applicable Law.

4. **Disclosure of Personal Data to third parties.** In fulfilling the purposes outlined in this Policy, we may disclose your Personal Data to the following third parties in accordance with the Applicable Law:

- (i) other entities within the Refico Group;
- (ii) external service providers, contractors, and third parties for service provision;
- (iii) business partners and vendors, including courier services and delivery chain entities;
- (iv) banks, credit card companies, payment vendors, and other payment processing entities;
- (v) debt collection agencies;

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- (vi) credit information companies and credit bureaus;
 - (vii) government bodies, including ministries, departments, agencies (including law enforcement), judicial or quasi-judicial bodies, and other statutory bodies;
 - (viii) advisors, such as auditors, accountants, and lawyers;
 - (ix) data intermediaries;
 - (x) any party you authorize us to disclose Personal Data to; and
 - (xi) prospective buyers or sellers in the event of a business or asset transaction.

*** It's worth noting that:

- (1) for our employees, any sharing of Personal Data, notwithstanding to the entities or parties mentioned above, shall be subject to opinion and confirmation of legitimate authorized personnel of Refico (i.e., your head of departments) in consultation with legal department – if needed.
- (2) for our partners, any sharing of Personal Data should be compliance with the Applicable Law, this Policy and any contractual obligations signed between relevant parties; and
- (3) for both our employees and partners, other than the recipients mentioned above in this section 3, any further sharing of Personal Data must be following Applicable Law, this Policy and subject to opinion and confirmation of legitimate authorized personnel of Refico (i.e., your head of departments) in consultation with legal department – if necessary.

5. **Security of Personal Data.** Refico adheres to stringent security standards and regulations. Our security measures are regularly reviewed to ensure Personal Data is safeguarded against loss, unauthorized or accidental access, unlawful use, disclosure, modification, erasure and destruction or unauthorized forms of processing in accordance with Applicable Law. The security protocols we implement include, but are not limited to, the following:

- (i) providing clear guidelines to staff on the types of Personal Data that may or may not be disclosed and implementing appropriate identity verification procedures to confirm the enquirer's identity and restricting access to personal data on a "need-to-know" basis and limiting staff access rights to office and SharePoint areas where confidential information is stored;
- (ii) regularly reviewing and enhancing security measures for protecting personal data on servers, user computers, and during the transmission of electronic messages;
- (iii) periodically encouraging relevant personnels to change passwords for IT facilities, accounting, and personnel systems; and

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- (iv) encrypting all backup storage devices that are transported to legitimate storage.
6. **Transfer Abroad.** Generally, your Personal Data will be stored in Vietnam. However, in the course of providing services to you, we may disclose, transfer, store, process, and/or handle your personal data outside of Vietnam. In doing so, we will comply with the Applicable Law and take measures to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under Applicable Law.
7. **Cookies and Other Websites.** Our website(s) utilize cookies to monitor browsing preferences and analyze webpage traffic, enabling us to make improvements based on your needs and enhance overall website efficiency. While we primarily use this information for statistical analysis, it may also be used in aggregated form for other purposes where your identity remains anonymous. When you visit our website(s), our servers automatically record certain information, including your computer's IP address, browser type, the webpage you visited prior to ours, the pages you visit within our website or mobile application, the time spent on those pages, items and information searched for, access times and dates, and other relevant statistics. Cookies do not grant us access to your computer. Most internet browsers automatically accept cookies, but you can usually adjust your browser settings to your preference. Please note that if you choose not to accept cookies, you may not be able to utilize all features of our website(s).
- Our website(s) may contain links to third-party websites that are not under our control. We are not responsible for the content of these websites or the consequences of accessing or using them, including the protection and privacy of any information you provide while visiting such sites. These websites are not governed by this statement, and you agree that your access to or use of these websites is entirely at your own risk. When visiting third-party websites, you should review their privacy policies, which will apply to your use of those websites.
8. **Retention of Personal Data.** While we have implemented reasonable technical and procedural measures to safeguard your Personal Data in accordance with this Policy, we cannot guarantee the security or integrity of any personal data transferred to or from you via internet or our website(s). You acknowledge and accept the risks associated with such transfers.

We will retain Personal Data for as long as necessary to fulfill the purpose for which it was collected, to meet our legal or business requirements, or as mandated by Applicable Law.

*** It's worth noting that:

- (1) Personal Data will not be kept longer than necessary for the fulfilment of the purpose for which the data is collected or used. Personal Data that is no longer required should be erased unless such erasure of Personal Data is prohibited under Applicable Law or it is in the public interest for the data not to be erased.
- (2) A destruction exercise on records containing Personal Data will be conducted as and when necessary and in accordance with Refico records management guidelines and procedures. Destruction of paper records would be carried out by irreversible means and electronic records would be cleared or destroyed from storage media before disposal by means of sanitization or physical destruction.

9. Right and Obligations of Data Subject.

Refico hereby recognizes all Data Subjects' rights in accordance with the Applicable Law. Data Subject have the following rights and obligations:

Rights

- to be informed;
- to give consent;
- to access Personal Data
- to withdraw consent;
- to delete Personal Data;
- to restrict data processing;
- to obtain Personal Data;
- to object to processing;
- to lodge complaints, denounce and sue;
- to claim compensation for damages; and
- to self-protection.

Obligations

- to protect their own personal data
- to request relevant organizations and individuals to protect their Personal Data;
- to respect and protect others' personal data
- to fully and accurately provide their personal data when consenting to its processing
- to participate in the dissemination of personal data protection skills; and
- to comply with Applicable Law on personal data protection and prevent violations of these regulations.

To exercise the Data Subject's right as mentioned above or in accordance with Decree 13 or for incident and violation reports in the event of personal data loss or leakage, or if there is reason to believe that the Personal Data held by Refico has been compromised, Data Subject should complete the form specified by Decree 13 and submit it to Refico through any of the following methods:

- By email: []
- By post or in person: Level 35, The Nexus Building, 3A-3B Ton Duc Thang, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam – Personal Data Protection Board.

Please note that when handling a data subject's rights request or report of incident or violation, Refico will verify the identity of the requester to ensure that they are legally entitled to exercise the Data Subject's rights under Applicable Law.

APPENDIX 1: LISTS OF REFICO'S AFFILIATES

For the purposes of the Policy, the Affiliates of Refico comprise the following companies:

- (1) City Garden Joint Stock Company, a joint-stock company that is duly established and operating in accordance with the laws of Vietnam, with the enterprise code 0305586533 initially issued on 13 March 2008 by the Department of Planning and Investment of Ho Chi Minh City, Vietnam and having its registered headquarters at P1-G.01, Area 2, 259 Ngo Tat To street, Ward 21, Binh Thanh District, Ho Chi Minh City, Vietnam.
- (2) City Garden Thu Thiem Company Limited, a limited company that is duly established and operating in accordance with the laws of Vietnam, with the enterprise code 0314455752 initially issued on 12 June 2017 by the Department of Planning and Investment of Ho Chi Minh City, Vietnam and having its registered headquarters at Level 35, The Nexus Building, 3A-3B Ton Duc Thang, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam.
- (3) Elite Real Estate Corporation, a joint stock company that is duly established and operating in accordance with the laws of Vietnam, with the enterprise code 0309587305 initially issued on 20 November 2009 by the Department of Planning and Investment of Ho Chi Minh City, Vietnam and having its registered headquarters at Level 35, The Nexus Building, 3A-3B Ton Duc Thang, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam.
- (4) Phuong Nam 3A-1 Real Estate Business and Investment Joint Stock Company, a joint stock company that is duly established and operating in accordance with the laws of Vietnam, with the enterprise code 0311205641 initially issued on 3 October 2011 by the Department of Planning and Investment of Ho Chi Minh City, Viet Nam and having its registered headquarters at 3A-3B Ton Duc Thang, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam.