

FOR CUSTOMERS

4.1.1. Types of Personal Data collected

4.1.1.1 Basic Personal Data

- Contact and identification information: Full name; date of birth; gender; nationality; phone number; email address; permanent address; contact address.
- Legal and identification information: Information on identity documents such as ID Card/Citizen Identification Card/Passport/personal identification number; other identification information as required by law (if any).
- Residency information: Information on the status, form, duration, and purpose of residency, in order to comply with legal regulations, manage records, and determine the scope of products/services provided.
- Transportation and access-control information: Transportation information (e.g., license plate number); access card information; access-control data for buildings, areas, or events.
- Information on needs and interests in products/services; registration information for consultation; registration to participate in events, programs, and activities organized by the Company.
- Information on products/services and history of product/service use: Registration and usage information for products/services; data related to the process and history of using products/services.
- Digital account data and usage history: Account data on the website/application, such as login information; data on usage history of the website, application, or service channels (e.g., views, actions, interactive content).
- Technical and system-operation data: IP address, cookies, device ID, device information, browser, system logs, and other technical data used for operation, security, and system improvement.
- Feedback and evaluation data: Customer feedback, complaints, recommendations, and evaluations.
- Information on Customer segmentation: Information on the Customer's preferences and needs regarding products and services.

4.1.1.2. Sensitive Personal Data

- Biometric data: Facial recognition data and other biometric data (where the Customer registers for or consents to its use).
- Health status, genetic characteristics or biological characteristics, and social characteristics (including sex life or sexual orientation, if any) recorded and stored during the provision of healthcare services or in medical records during medical examination and treatment at each of the Company's medical facilities.
- Financial, credit, and transaction information: Information related to contracts, transactions, financing, guarantees, or loans (including financial and credit information); bank account information and payment information (including financial transaction information).

- Identifiable audio/video recording data: Data from audio/video recording systems at buildings, residential areas, public areas, or events, to the extent it may be used to identify or track an individual.
- Data on activities and behavior on the Company's online services: Data on website/application access journeys, cookie data on application usage behavior, user interaction data, and data on user profiles or segmentation.
- Images of ID Card/Citizen Identification Card/Passport.

4.1.2. Legal basis for processing Personal Data and purposes of processing Personal Data

The Company processes the Customer's Personal Data for the following purposes, based on consent or on other legal grounds such as the performance of an agreement, compliance with legal obligations, and other legal grounds as described below.

4.1.2.1. Based on the consent of the Data Subject, Personal Data is processed to:

(a) Marketing and advertising

Provide consultation, introduction, and communication regarding the Company's products and services through events, programs, community activities, or other means such as the website, application, and digital platforms; personalize advertising and marketing on the website, application, digital platforms, and other means based on the Customer's preferences.

(b) Research, development, and improvement of products and services

Carry out research, development, and improvement of products/services; personalize the Customer's experience through technological improvements to the website interface, social media, and applications to ensure convenience for the Customer.

(c) Transfer Personal Data to a third party for the third party's own purposes (e.g., research and development; advertising and marketing of products/services) as permitted by law.

4.1.2.2 To carry out other purposes for which the law permits the processing of Personal Data without the consent of the Data Subject, including:

(a) Assessing the ability to provide products/services to a specific Customer, as follows:

- Identifying and verifying information about the Data Subject.
- Assessing, appraising, and approving the provision of products/services in accordance with the registration documents, applications, and contracts of the Data Subject and/or persons related to the Data Subject.
- Considering whether to provide or continue providing any of the Company's products/services to the Data Subject.

(b) Performing contracts, agreements, and other instruments between the Company and the Data Subject, and supporting specific Customers, as follows:

- Performing obligations under contracts and agreements, and providing products/services to the Data Subject.
- Updating and processing the Data Subject's information.

- Providing customer care and resolving the Data Subject's complaints and grievances.
- Using and transferring to partners Personal Data and related information in order to identify and remedy product/service issues, and to repair products.
- Contacting and notifying the Data Subject.
- Implementing promotional programs, gift exchanges, and rewards.
- Carrying out other customer-care and support activities, such as providing services and amenities for the Customer.
- Providing and operating online services through the website, application, and digital platforms.
- Organizing and managing events, programs, and community activities.

(c) Fulfilling the Company's legal obligations

- Complying with legal regulations on tax, accounting, anti-money laundering, cybersecurity, and other related regulations, as well as international treaties to which Vietnam is a party.
- Complying with requests and decisions of competent state authorities.

(d) Protecting the legitimate and lawful rights and interests of the Data Subject and/or the Company

- Ensuring security, safety, and order in residential areas, buildings, at events, and at other Company premises; protecting the lawful rights and interests of the Data Subject, the Company, and other related parties;
- Preventing, investigating, detecting, deterring, and handling crimes and acts that infringe upon the life, health, property, rights, and lawful interests of the Company and its Customers.

(e) Responding emergency situations.

The processing of Personal Data under this section includes the transfer of Personal Data to a Personal Data Processor or to third parties (e.g., subcontractors) in order to carry out the purposes stated above.

In the course of its business operations, the Company may undertake forms of corporate reorganization, including but not limited to restructuring, division, separation, merger, or consolidation. In such cases, Personal Data and the rights to use related information may be transferred and/or continue to be processed to support the activities mentioned above, provided that no new data-processing purpose arises beyond those set out in Section 4.1.2.2 of this Policy.