

**PRIVACY POLICY**  
**HASEKO LHT CO., LTD**

Scope:

On this Privacy Policy, “Company”, “we”, or “our” each means **HASEKO LHT CO., LTD**, which process Personal Information in the manner set out in this Privacy Policy. Any reference to “customer”, “you” or “your” refers to anyone whose Personal Information we process, including our customers, suppliers, employees and any other parties whom we deal with.

The Company respects your privacy and is committed to keeping your information and other data confidential and secure in accordance with applicable data protection legislation. By providing your information to the Company (including via Website or not via Website), you agree to this Policy and constitute your consent to the processing of your information in accordance with this Policy. If you do not agree to this Privacy Policy, please do not provide us with your information.

Purpose:

The Company is engaged in the business of operating Serviced Apartment in Hanoi, Vietnam. We from time to time gathers information to carry out our business activities and improve and promote the products and services that we provide. Therefore, we issue this Privacy Policy (“Policy”) to provide a general statement on the ways in which the Company aims to collect, store and/or disclose (“process”) your information when you use our services.

The Company also recognizes the importance of protecting Personal Information. The proper use and protection of this information not only forms the basis of our business activities, but also represents key areas of our social responsibility. Therefore, to better ensure your trust, we will take action in accordance with the following:

- (i) Clarify the purpose of use and the procedure to handle your information.
- (ii) Describe how and why we might process, safeguard and to whom we share your information.
- (iii) Let you know how you may access and correct your information.

Rules:

**1. WHAT PERSONAL INFORMATION DO WE COLLECT?**

Through the course of our business, the Company receives a wide range of Personal Information about your needs or circumstances that you voluntarily provide to us when you express an interest in obtaining information about us or our products and services, or otherwise when you contact us, which would allow us to identify you, including but not limited to the following:

- (i) Personal details such as name, date of birth, gender, nationality, phone number and email address.
- (ii) Digital account information such as username, password, contact preference, or other authentication data.
- (iii) Information relating to financial position, business activities, buying habits, and product preferences relevant to our products, services, and business activities.
- (iv) Information about your commercial interests and requirements, products that you may wish to purchase or services for which you may wish to engage us to perform.
- (v) Information regarding our communication with you and your attendance at conferences or promotional events.
- (vi) If you are an employee or prospective employee, information about your qualifications, skills, and work experience, as well as performance reviews, career objectives and development plans; and
- (vii) If you are a supplier or prospective supplier, information about your business skills, services, products, and prices.

All Personal Information must be true, complete, and accurate, and you must notify us of any changes to such information.

## **2. WHY DO WE COLLECT PERSONAL INFORMATION?**

The Company processes Personal Information for the purposes identified at the time of collection, depending on how you interact with our products and services, which may include:

- (i) To provide our products and services, such as verifying your identity, contacting you about orders, processing payments, training staff, testing systems and engaging with our suppliers.
- (ii) For customer support, including providing information deemed useful to you, resolving and providing assistance for orders or responding to other inquiries or requests.
- (iii) To engage in marketing activities for our business and to conduct market research and development of new products and services and other analyses to improve our products and services.
- (iv) Informing you about events, seminars, campaigns, membership services, special offers or promotions that are relevant to your relationship with us.
- (v) For security and fraud prevention, including monitoring the safety and security of our Website, and completing incident investigations and confidential alternative dispute resolution processes.

- (vi) To maintain records for administrative and business purposes and any other purpose that is advised to you to comply with respective laws.

Where the Company collects Personal Information about you in order to conduct a marketing promotion, your entry into that promotion as a participant is conditional on providing this information. If the information requested is not provided, you may not participate in that promotion.

### **3. HOW DO WE COLLECT PERSONAL INFORMATION?**

- 3.1. In the course of conducting our range of business activities, we collect Personal Information by various means including when:
  - (i) You contact us with a question or inquiry by telephone or email.
  - (ii) You complete an application form or survey.
  - (iii) You enter into a commercial transaction with us and provide us with banking or credit card details.
  - (iv) You, licensees or partners provide information to us relating to the products or services we are providing.
  - (v) We collect information from third parties.
  - (vi) You visit our Website.
- 3.2. Where practical, the Company will notify and obtain your express consent to the processing of Personal Information, by interpreting your actions, including ticking the consent box, entering consent syntax via message, selecting consent settings or other forms that can be printed and reproduced in writing, as indicating your consent to the processing of Personal Information.
- 3.3. Where practicable we collect Personal Information about you directly from you. However, we may have collected information about you from a third party such as a licensee, a marketing or competition partner or a person responding to our questions or inquiries.
- 3.4. Where practical, customers, suppliers and other parties may deal with the Company on an anonymous basis. However, if you do not provide us with accurate Personal Information, we may not be able to achieve the purpose for which the information has been sought.

### **4. HOW DO WE STORE AND SECURE PERSONAL INFORMATION?**

- 4.1. Personal Information may be stored in hard copy, electronic files or both. Hard copy Personal Information is wherever practical, kept under locked security. Personal Information stored electronically is wherever practical, password protected. The Company uses third party information system providers who may store or have access to Personal Information. Where possible and practical, we

will endeavour to comply with Vietnamese regulations and recognised international standards relating to information security.

- 4.2. The Company will make every effort to manage Personal Information in a safe and appropriate manner by implementing technical and security measures and cooperate in good faith with the competent authorities to prevent and handle violations, including exposing Personal Information to risks, such as the unauthorized access of Personal Information from the outside or the loss, destruction, alteration, and leakage of information.
- 4.3. The Company cannot make a commitment to ensure that Personal Information will be absolutely secure and we exclude all liability, including in negligence, for the undesirable consequences and damages of any unauthorised access, disclosure of, misuse of or loss or corruption of Personal Information not due to our misconduct. If you do not agree to the terms described above, we recommend that you should not provide your information to the Company.
- 4.4. In case of detection of an illegal information leakage or a violation against regulations on protection of personal data, the Company shall notify the Ministry of Public Security (Department of Cybersecurity and Hi-tech Crime Prevention) within 72 hours after such violation is committed.

## **5. TO WHOM DO WE DISCLOSE PERSONAL INFORMATION?**

The Company may disclose Personal Information to officers, employees, contractors, advisors, agents (including subsidiaries, affiliates, representatives and branch offices of the Company) and competent authorities to the extent necessary to ensure smooth performance of the business operations it outsources to these entities. In this case, the Company will enter into agreements with these entities regarding the handling of the above information and implement other measures to supervise them. This makes occur where you have provided Personal Information for a particular purpose and that purpose cannot be achieved without these entities making use of that Personal Information.

## **6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

- 6.1. The Company uses cookies exclusively for improving the products and services we provide, to make the website easier for customers to use, to ensure the security of the web server, and to evaluate the content on the website. Cookies do not record any private information, such as name and contact information of customers. In addition, cookies do not affect the terminals used by customers and the data stored on them.

- 6.2. The customer can disable the cookie function by changing the configuration of the browser the customer use. Please note that disabling this function may prevent customers from using all or some of the services on the website.

## **7. HOW LONG DO WE KEEP PERSONAL INFORMATION?**

- 7.1. We will only keep Personal Information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law or to protect ourselves against legal claims, use it for analysis or historical record-keeping, or comply with our information management policies and schedules.
- 7.2. When we have no ongoing legitimate business need to process Personal Information or you request that we delete Personal Information, we will make reasonable attempts to either delete or anonymize such information, or if this is not possible, then we will securely store Personal Information and isolate it from any further processing until deletion is possible.

## **8. HOW CAN YOU RECTIFY PERSONAL INFORMATION?**

You can access, review, correct, update, disclose, delete or suspend the use of Personal Information. Unless we are subject to confidentiality obligations or some other restriction on giving access to the information or permitted to refuse you access under the respective laws, we will endeavour to accommodate your request within a reasonable period.

Your above requests will be accepted in accordance with the following procedures:

- (i) Request must be made by visiting the Company office or submitting a request by contacting the Company using the information set out below.
- (ii) The identity of the customer will be confirmed by various means required by the Company.
- (iii) A prescribed fee may be charged to process a request to disclose Personal Information.

## **9. WHAT ARE YOUR RIGHTS AND OBLIGATIONS?**

By providing Personal Information for the Company, you have rights and obligations in accordance with respective laws, which may include:

- (i) To comply with the relevant applicable law.
- (ii) Respect and protect your and others' Personal Information.
- (iii) Fully and accurately provide your Personal Information when you consent to the processing.
- (iv) To be informed of your Personal Information handling procedures.

- (v) To give/withdraw consent to the processing of your Personal Information.
- (vi) To access or to request the Company to provide you with Personal Information in order to view, rectify/delete or request rectification/deletion.
- (vii) To obtain restriction on or object to the processing of Personal Information, which is implemented within 72 hours after receiving your request, and all Personal Information that you request the restriction.
- (viii) To self-protection or request competent authorities to implement civil right protection methods, including but not limited to recognizing, respecting, protecting and guaranteeing your civil rights; order the termination of the act of violation; order a public apology and/or rectification; order the performance of civil obligations; order compensation for damage from the Company or cancellation of isolated unlawful decision of competent individuals and entities

You can always choose to decline to provide less information to us. However, the failure to provide us with pertinent information may limit your ability to access all of the benefits of our Website and services. Please keep in mind that we only ask for Personal Information that can help us fully provide our products and services to you.

#### **10. DO WE MAKE UPDATES TO THIS POLICY?**

We reserve the right, at our sole discretion, to update this Privacy Policy that is necessary for our business requirements or to stay compliant with relevant laws from time to time. The updated version will be effective as soon as it is accessible. If we make material changes to this Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Policy frequently to make sure you are familiar with the most recent version. Your continued use of our Website after updates to this Policy have been posted constitutes your acceptance of such updates.

#### **11. HOW CAN YOU CONTACT US?**

If you have any questions, comments or requests regarding any aspect of this Privacy Policy and concerns or complaints about the manner in which your information has been collected by us, please do not hesitate to contact us via the following address:

**HASEKO LHT CO., LTD**

Address: Authentic Long Bien Haseko Residence, Land Lot marked CT1 in Tu Dinh Resident Complex Project in Long Bien Ward, Long Bien District, Hanoi, Vietnam

Tel: +84 24 66641710                      Fax: +84 24 66641712

Email: reservation\_theauthenticLB@haseko-asia.com

We will respond to your complaint or try to resolve the issue to your satisfaction within a reasonable period at our best effort.

*This Privacy Policy was last updated on [1<sup>st</sup> MAR 2024]*