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; telephone number; email address; permanent residential address; contact address.
- Legal and identity information: Information contained in identification and identity documents, such as Identity Card/Citizen Identity Card/Passport/Personal Identification Number; other identification information as prescribed by law (if any).
- Residency information: Information on residency status, type, duration and purpose of residency for compliance with applicable laws, record management, and determination of the scope of products and services to be provided.
- Transportation and access control information: Transportation-related information (e.g., vehicle license plate number); access card information; access control data relating to buildings, areas or events.
- Information on needs and interests in products and services: Information on customers' needs and interests in products and services; requests for consultation; registration to participate in events, programs and activities organized by the Company.
- Information on products, services and usage history: Information on registration for and use of products and services; data relating to the process and history of using products and services.
- Digital account data and usage history: Account data on websites/applications, such as login information; data relating to the history of using websites, applications or service channels (e.g., views, actions and interaction content).
- Technical and system operation data: IP address, cookies, device ID, device information, browser information, system logs and other technical data serving system operation, security and system improvement.
- Feedback and evaluation data: Data relating to feedback, complaints, recommendations and evaluations provided by Customers.
- Customer segmentation information: Information on Customers' 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 information: Health status, medical history, and areas of bodily pain or discomfort for the purpose of providing consultation and adjusting massage pressure appropriately and safely.

- Financial, credit and transaction information: Information relating to contracts, transactions, financing, guarantees or loans (including financial and credit information); bank account information and information required for payment processing (including financial transaction information).
- Identifiable audio and visual data: Data collected from audio and video recording systems at buildings, urban areas, public areas or events, to the extent that such data may be used to identify or track an individual.
- Data relating to activities and behavior on the Company's online services: Data relating to website/application browsing journeys, cookie data concerning application usage behavior, user interaction data, and data relating to user profiles or user segmentation.
- Images of identity and identification documents: Images of Identity Cards/Citizen Identity Cards/Identification Cards/Passports.

4.1.2. Legal Bases for Processing Personal Data and Purposes of Processing Personal Data

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

4.1.2.1. Based on the Data Subject's consent, Personal Data is processed for the following purposes:

(a) Marketing and advertising

Providing consultation, introducing and communicating information about the Company's products and services through events, programs, community activities or other means, including websites, applications and digital platforms; personalizing advertising and marketing activities on websites, applications, digital platforms and other media based on Customers' preferences.

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

Conducting research, development and improvement of products/services; personalizing Customers' experiences through improvements to technology, electronic information interfaces, social media and applications to ensure greater convenience for Customers.

(c) Transfer of Personal Data to Third Parties for their own purposes (e.g., research and development; advertising and marketing of products and services) in accordance with applicable laws.

4.1.2.2. For other purposes for which the processing of Personal Data is permitted by law without the Data Subject's consent, including:

(a) Assessing the Company's ability to provide products and services to specific Customers, including:

- Identifying and verifying information relating to the Data Subject.

- Assessing, appraising and approving the provision of products and services based on 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 products or services of the Company to the Data Subject.

(b) Performance of contracts, agreements and other documents between the Company and the Data Subject, and provision of support to Customers, including:

- Performing obligations under contracts and agreements and providing products and services to the Data Subject.
- Updating and processing the Data Subject's information.
- Providing customer care and handling complaints and claims raised by the Data Subject.
- Using and transferring Personal Data and related information to partners for the purpose of identifying and resolving issues relating to products and services, and repairing products.
- Contacting and notifying the Data Subject.
- Implementing promotional programs, gift redemption programs, award programs and gift delivery.
- Providing other customer care and support activities, including providing services and amenities for Customers.
- Providing and operating online services through websites, applications and digital platforms.
- Organizing and managing events, programs and community activities.

(c) Compliance with the Company's Legal Obligations

- Complying with applicable laws and regulations on taxation, accounting, anti-money laundering, cybersecurity and other relevant legal requirements, as well as international treaties to which Vietnam is a member.
- Complying with requests and decisions of competent state authorities.

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

- Ensuring security, safety and public order at urban areas, buildings, events and other locations of the Company; protecting the lawful and legitimate rights and interests of the Data Subject, the Company and other relevant parties;
- Preventing, investigating, detecting, preventing and handling crimes and acts that infringe upon the life, health, property, lawful rights and interests of the Company and Customers.

(e) For the purpose of addressing emergency situations.

The processing of Personal Data under this section includes the transfer of Personal Data to Personal Data Processors and Third Parties (e.g., subcontractors) for the purposes stated above.

In the course of its business operations, the Company may undertake various forms of corporate reorganization, including but not limited to restructuring, division, demerger, merger or consolidation. In such cases, Personal Data and the rights to use related information may be transferred and/or continue to be processed for the purposes of carrying out the activities mentioned above, provided that such activities do not give rise to any new purposes of Personal Data Processing beyond those specified in Section 4.1.2.2 hereof.