PERSONAL DATA PROTECTION POLICY
OF GELEX GROUP JOINT STOCK COMPANY

(Issued on the basis of the Regulation on Personal Data Protection of GELEX Group Joint Stock Company attached to Decision No. 117/2026/GELEX/QĐ-TGĐ dated 02/11/2026 of the General Director of GELEX Group Joint Stock Company)

I. DECLARATION AND GENERAL TERMS

1. GELEX Group Joint Stock Company (**"GELEX"**) respectfully announces that the Personal Data Protection Policy (**"Policy"**) is issued by GELEX and shall take effect from 02/11/2026 on the basis of the Regulation on Personal Data Protection of GELEX Group Joint Stock Company attached to Decision No. 117/2026/GELEX/QĐ-TGĐ dated 02/11/2026 of the General Director of GELEX Group Joint Stock Company.
2. This Policy shall be publicly announced and updated from time to time on GELEX's website so that Data Subjects, partners, clients, and organizations and individuals having working, cooperation or exchange relationships with GELEX (collectively referred to as "Clients") may proactively review and comply with it when providing information to GELEX.
3. GELEX affirms that, in its capacity as the Data Controller or the Data Controller cum Processor, GELEX shall strictly comply with the law and respect the legitimate rights and interests of Data Subjects in the protection of personal data. Within the scope of this Policy, GELEX provides the information and rules that Clients need to know regarding GELEX's collection and processing of personal data before Clients provide any personal data, or exercise the right to consent as a Data Subject or as a person authorized/permitted by a Data Subject.
4. In addition to this Policy, GELEX has issued a Regulation on Personal Data Protection with more detailed and comprehensive content, which serves as the basis for GELEX to carry out any data control and processing activities, as well as the basis for developing this Policy. The terms, definitions and references in this Policy are construed in accordance with Vietnamese law, including the Law on Personal Data Protection No. 91/2025/QH15 ("Law PDP 2025"), Decree No. 356/2025/ND-CP of the Government and their detailed guiding documents, amendments, supplements or replacements from time to time.
5. When Clients provide GELEX with the personal data of other Data Subjects, Clients warrant that they have fully informed such Data Subjects of the contents of this Policy and have obtained the lawful consent of such Data Subjects to this Policy and to GELEX's processing of personal data, so that GELEX may process such personal data for the purposes set out in this Policy. Clients further acknowledge and agree that GELEX shall have no obligation to verify or re-examine such consent.

II. PRINCIPLES OF PERSONAL DATA PROTECTION

1. Data Subjects shall be informed of activities related to the processing of their personal data, unless otherwise provided by law.
2. Personal data shall only be processed for the purposes registered or declared by the Data Controller, the Data Processor, the Data Controller cum Processor or the Third Party with respect to the processing of personal data.

3. Personal data collected 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 law.
4. Personal data shall be updated and supplemented in accordance with the processing purposes; protection and security measures shall be applied during processing, including protection against violations of personal data protection regulations and prevention of loss, destruction or damage caused by incidents, using technical measures; and personal data shall only be retained for a period appropriate to the processing purposes, unless otherwise provided by law.
5. Where GELEX participates in the processing of personal data or acts as the Data Controller or the Data Controller cum Processor, GELEX shall be responsible for complying with the principles of personal data processing provided in this Section.
6. Where GELEX designates a Data Processor, being an organization or individual processing personal data on behalf of GELEX (as the Data Controller), the Data Processor shall comply with this Policy and the principles of personal data processing provided in this Section and Article 3 of Law PDP 2025, and shall demonstrate its compliance with such principles upon request by GELEX.
7. Any organization or individual having a cooperation, working or exchange relationship with GELEX that participates in the processing of personal data and acts as a Data Controller or a Data Controller cum Processor shall be required, and shall be responsible, to comply with the principles of personal data processing provided in Article 3 of Law PDP 2025 and to demonstrate its compliance with such principles upon request by GELEX.
8. Personal data processing in violation of the law; unlawful purchase or sale of personal data; misappropriation, intentional disclosure or loss of personal data; use of another person's personal data, or allowing another person to use personal data, for the purpose of committing unlawful acts; and other prohibited acts as prescribed by law are strictly prohibited (Clauses 4, 5, 6 and 7, Article 7 of Law PDP 2025).

III. TYPES OF PERSONAL DATA PROCESSED

GELEX directly or indirectly, through another Data Processor (if applicable), may process one or more of the following types of personal data, depending on the processing purpose and to the extent permitted by law (Clause 2, Article 3 of Law PDP 2025):

1. Basic personal data (Article 3 of Decree 356/2025/ND-CP)

a. Surname, middle name and given name at birth, other names (if any);
b. Date of birth; date of death or date of going missing;
c. Gender;
d. Place of birth, place of birth registration, place of permanent residence registration, place of temporary residence registration, current place of residence, place of origin, contact address;
e. Nationality;
f. Personal image;

g. Phone number, personal identification number, passport number, driver's license number, vehicle license plate number;

h. Marital status;

i. Information about family relationships (parents, children, spouse);

j. Information about the individual's digital accounts;

k. Other information associated with a specific individual or helping to identify a specific individual that does not fall under Clause 2 of this Section.

2. Sensitive personal data (Article 4 of Decree 356/2025/ND-CP)

a. Data revealing racial origin or ethnic origin;

b. Political, religious or belief views;

c. Information on private life, personal secrets and family secrets;

d. Health status;

e. Biometric data and genetic characteristics;

f. Data revealing the sex life or sexual orientation of the individual;

g. Data on crimes and violations of law collected and stored by law enforcement agencies;

h. Location of the individual as determined through location services;

i. Login names and passwords for the individual's electronic identification accounts; images of identity cards, citizen identity cards and people's identity cards;

j. Login names and passwords for bank accounts; bank card information and transaction history data of bank accounts; financial and credit information and information on financial, securities and insurance activities and transaction history of customers at credit institutions, foreign bank branches, payment intermediary service providers, securities and insurance organisations and other licensed organisations;

k. Data tracking the behaviour and activities in the use of telecommunications services, social networks, online communication services and other services in cyberspace;

l. Other personal data required by law to be kept confidential or to be subject to strict security measures.

3. Where GELEX processes sensitive personal data on the basis of consent, the Data Subject shall be informed that the data to be processed is sensitive personal data as prescribed by law; GELEX applies appropriate access-control and security measures to sensitive personal data in accordance with law (Clause 2, Article 4 and Clause 4, Article 6 of Decree 356/2025/ND-CP).

IV. PURPOSES OF PERSONAL DATA PROCESSING

GELEX processes personal data for the following purposes:

1. To compile and assess information before establishing relationships, agreements, transactions or contracts with Clients.

2. To identify, verify and maintain accurate Client identification information; to ensure the security and safety of GELEX's information systems; and to meet Client due diligence requirements as prescribed by law.
3. To perform obligations under contracts or agreements between GELEX and Clients (if any).
4. To carry out risk assessment, trend analysis, statistics and planning, including data processing and analysis relating to statistics, credit and anti-money laundering.
5. To detect, prevent and investigate crimes, attacks or violations, including fraud, money laundering, terrorism, financing of the proliferation of weapons of mass destruction, bribery, corruption or tax evasion.
6. To provide information to competent authorities, to disclose information, and to build relevant databases in accordance with law.
7. To comply with, and demonstrate GELEX's compliance with, applicable legal requirements, including but not limited to laws on public companies, tax laws, anti-money laundering laws, data retention requirements, and regulations relating to disputes or litigation.
8. To carry out GELEX's management, inspection, supervision, integrity compliance, non-competition and similar activities.
9. Other purposes in accordance with law.

V. METHODS OF PROCESSING PERSONAL DATA

Depending on the purpose of processing personal data, GELEX, GELEX's Data Processor or a Third Party permitted to process data for GELEX may apply appropriate processing methods, including but not limited to: collection, recording, analysis, verification, storage, modification, disclosure, combination, access, retrieval, recall, encryption, decryption, copying, transmission, provision, transfer, deletion, destruction of personal data or other related actions. GELEX processes personal data by automated, manual or other methods in accordance with the law and GELEX's regulations from time to time.

VI. RIGHTS AND OBLIGATIONS OF DATA SUBJECTS

1. Rights of Data Subjects

GELEX ensures compliance with the law on the rights of Data Subjects with respect to all and any personal data for which GELEX acts as the Data Controller or the Data Controller cum Processor, including:

a. Right to be informed: Data Subjects have the right to be informed of the processing of their personal data, unless otherwise provided by law.

b. Right to consent: Data Subjects have the right to consent or not to consent to the processing of their personal data through a specific expression in writing, by voice, by ticking a consent box, by a consent syntax via text message, by selecting technical consent settings, or by any other action demonstrating such consent. Silence or non-response of the Data Subject shall not be deemed consent.

c. Right of access: Data Subjects have the right to access, view and correct, or request the correction of, their personal data, unless otherwise provided by law.

d. Right to withdraw consent: Data Subjects have the right to withdraw their consent, unless otherwise provided by law.

e. Right to erasure: Data Subjects have the right to delete, or request the deletion of, their 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 their personal data, unless otherwise provided by law (Clause 2, Article 5 of Decree 356/2025/ND-CP).

g. Right to obtain personal data: Data Subjects have the right to request the Data Controller or the Data Controller cum Processor to provide them with their own personal data, unless otherwise provided by law.

h. Right to object to processing: Data Subjects have the right to object to the Data Controller or the Data Controller cum Processor processing their personal data in order to prevent or restrict the disclosure of personal data or its use for advertising or marketing purposes, unless otherwise provided by law (Clause 2, Article 5 of Decree 356/2025/ND-CP).

i. Right to complain, denounce and initiate lawsuits: Data Subjects have the right to file complaints, denunciations or lawsuits in accordance with law.

j. Right to claim compensation for damage: Data Subjects have the right to claim compensation for damage in accordance with law upon a violation of the regulations on protection of their personal data, unless otherwise agreed by the parties or otherwise provided by law.

k. Right to self-protection: Data Subjects have the right to self-protection in accordance with the Civil Code and other relevant laws, or to request competent agencies and organizations to apply methods of protecting civil rights in accordance with law.

2. Obligations of Data Subjects

a. To protect their own personal data; to request other relevant organizations and individuals to protect their 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 communicating and disseminating personal data protection skills.

e. To comply with the law on personal data protection and to participate in preventing and combating violations of the regulations on personal data protection.

3. Exercise of Data Subject Rights

a. GELEX shall respond to a Data Subject's request within 02 working days from the date of receipt of the request (Clauses 2, 3 and 4, Article 5 of Decree 356/2025/ND-CP).

b. The time limit for fulfilling a request, from the date of receipt of a valid request, shall be: (i) 15 days for withdrawal of consent, restriction of processing, or objection to the processing of personal data; (ii) 10 days for viewing, provision, correction or request for correction of personal data; and (iii) 20 days for deletion of personal data. Where a Data Processor or a Third Party is required to fulfil the

request, the corresponding time limits shall be 20 days, 15 days and 30 days, respectively (Clauses 2, 3 and 4, Article 5 of Decree 356/2025/ND-CP).

c. Before deleting personal data, GELEX shall verify the applicable conditions and exceptions in accordance with law; where the personal data cannot be deleted for legitimate reasons, GELEX shall notify the Data Subject accordingly (Clauses 2 and 5, Article 14 of Law PDP 2025).

d. GELEX shall require the relevant Data Processors and Third Parties to implement the corresponding requests of Data Subjects and shall maintain records of the handling of such requests (Clause 3, Article 10; Clause 2, Article 13; Clause 3, Article 14 of Law PDP 2025).

VII. PERSONAL DATA PROCESSING PERIOD; DELETION AND DESTRUCTION OF PERSONAL DATA

1. The data processing period shall commence when GELEX begins to receive and/or collect personal data.
2. The data processing period shall end when GELEX completes the processing of personal data, depending on the type of data, the processing purpose and the specific processing activity, while ensuring compliance with law.
3. Personal data shall be deleted or destroyed in the following cases:
   a. Upon expiry of the processing period specified in Clause 2 of this Section, unless otherwise provided by law;
   b. Under an agreement with the Clients in a signed contract, agreement or other document;
   c. Under a decision of GELEX;
   d. In accordance with the law and/or mandatory requirements of competent authorities.

VIII. PROVISION OF PERSONAL DATA

GELEX may consider sharing the personal data provided by Clients to GELEX with the following organizations and individuals for the purposes set out in Section IV of this Policy, on an appropriate legal basis for personal data processing in accordance with law (Clause 2, Article 15 and Clause 1, Article 17 of Law PDP 2025):

1. Any member unit of GELEX; subsidiaries, joint venture companies and associated companies as determined by GELEX from time to time.
2. Domestic or foreign organizations and individuals providing personal data processing services.
3. Competent authorities in accordance with law.
4. Organizations and individuals providing insurance or insurance brokerage services for GELEX's employees, and management and operation units of buildings, offices and hotels owned or managed by GELEX.
5. Credit institutions having relationships with GELEX.
6. Individuals within GELEX, for the purposes of governance, management and administration.

7. Partners and clients, for the purposes of information verification and performance of commitments, provided that such partners and clients have undertaken confidentiality obligations to GELEX.
8. Other relevant parties that GELEX deems necessary to satisfy and protect the lawful rights and interests of Data Subjects.
9. GELEX's advisors/consultants, including accountants, auditors, lawyers, financial advisors, etc.
10. Other organizations and individuals, on the basis of compliance with the law and the consent of the Clients.

IX. POTENTIAL RISKS AND GOVERNANCE MEASURES

1. GELEX always values privacy and endeavours to keep confidential and ensure the security of the personal data of Data Subjects, in strict compliance with the law on personal data protection, and to minimize or eliminate unintended consequences and damage that may arise in the event of a personal data leak.
2. Clients understand that providing personal data to, and accepting the use and processing of personal data by, GELEX always entails risks of leakage or of improper or untimely processing, which may arise from causes such as system or transmission failures, force majeure events, viruses, cyberattacks, hardware or software errors, or actions or operations of personnel or of any other third party affecting the provision and processing of personal data.
3. Possible risks include personal data being disclosed or stolen by another party, as a result of which such personal data may be used for unintended purposes such as nuisance advertising and marketing, fraud, coercion or other unlawful acts beyond GELEX's control, causing both material and non-material losses.
4. Measures to minimize or eliminate consequences and damage in the event of a personal data leak:
    a. Notify the relevant parties of the violation immediately upon discovering the leak.
    b. Report to the competent authorities for prevention and handling.
    c. Endeavour to implement measures to remedy the consequences.
    d. Other measures appropriate to the situation arising.

X. EFFECTIVENESS

1. This Policy shall take effect from the date of its signing and issuance.
2. Matters not addressed in this Policy shall be implemented in accordance with the prevailing law and other internal regulations of GELEX.
3. If any provision of this Policy is inconsistent with the law as promulgated from time to time, the law shall prevail.

4. Where necessary, GELEX may amend, update, or modify the provisions of this Policy at any time; any such amendment, update or modification shall be publicly announced in accordance with Clause 2, Section I of this Policy.

GELEX GROUP JOINT STOCK COMPANY
GENERAL DIRECTOR

(signed)

Le Tuan Anh