

CUSTOMER PERSONAL DATA PROTECTION POLICY NOTICE

Date: March 19, 2026

This Customer Personal Data Protection Policy Notice (“**Notice**”) is issued by Ba Na Suoi Mo Golf Joint Stock Company and its subsidiaries, affiliates and partners (collectively referred to as “**We**”, “**Us**”, or “**Our**”) in relation to the processing of customers’ personal data.

This Notice describes and governs the manner in which We collect and process personal data of customers who use or interact with Our products, goods, services or websites or enter into agreements with Us, and/or the personal data of related persons of customers and/or co-owners or users of Our products/services/goods (collectively referred to as the “**Customers**”).

We recommend that Customers carefully read this Notice and regularly check the website at <https://banahillsgolf.com/> for updates to any changes that We may make in accordance with the terms of this Notice (if any).

This Notice forms an integral part of the sale and purchase agreement, service agreement, cooperation agreement or other agreement (“**Agreement**”) entered into between Customers and Us (if any).

1. SCOPE OF DATA COLLECTION

1.1. During the course of using or interacting with Our products, goods, services, websites, or entering into Agreements with Us, Customers may be requested to provide certain personal data. Such personal data may include, but is not limited to, the following and may vary depending on the products, services, goods, Customers’ interaction with Us, and applicable laws (“**Personal Data**”):

- **Basic personal data** includes: (a) Full name, middle name and given name at birth, and other names (if any); (b) Date of birth; date of death or missing status; (c) Gender; (d) Place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown, contact address; (dd) Nationality; (e) Image of the individual; (g) Telephone number, personal identification number, passport number, driver’s license number, vehicle license plate number; (h) Marital status; (i) Data relating to family relationships (parents, children, spouse); (k) Data relating to an individual’s digital accounts; (l) Other data associated with or helping to identify a specific individual.
- **Sensitive personal data** refers to personal data associated with an individual’s privacy which, if infringed upon, will directly affect the lawful rights and interests of individuals or organizations, including: (a) Data revealing racial or ethnic origin; (b) Political opinions, religious or philosophical beliefs; (c) Data concerning private life, personal secrets, or family secrets; (d) Health status; (dd) Biometric data and genetic characteristics; (e) Data revealing an individual’s sexual life or sexual orientation; (g) Data relating to crimes or violations of law collected and stored by law enforcement agencies; (h) Location of an individual determined through location services; (i) Login name and password of an individual’s electronic identification account; images of identity cards, citizen identification cards, or identification documents; (k) Login name and password of bank accounts; bank card data; transaction history of bank accounts; financial and credit data and other data relating to financial activities, securities, insurance, and transaction history of customers at credit institutions, foreign bank branches, payment intermediary service providers, securities companies, insurance companies, and other permitted organizations; (l) Data tracking behavior and activities in the use of telecommunications services, social networks, online communication services and other services in cyberspace; (m) Other personal data as prescribed by law that must be kept confidential or subject to strict security measures.

1.2. Customers must ensure the accuracy and legality of the Personal Data. We shall not be responsible for or resolve any complaints or disputes relating to Customers’ interests in the event the data provided by Customers is inaccurate.

- 1.3. When Customers interact on Our website, certain types of data may be collected, such as:
 - Data relating to websites or applications: technical data (including device type, operating system, browser type, browser settings, IP address, language settings, date and time of connection to the website, application usage statistics, application settings, date and time of connection to the application, browser addresses accessed; location data and other technical communication information); account name; password; secure login details; usage data, etc.
 - Advertising data: advertising interests, cookie data, clickstream data, browsing history, responses to direct marketing.
- 1.4. We use cameras and other similar technologies (collectively referred to as “**cameras**”) to identify individuals and vehicles entering and exiting Our business premises and areas under Our management.
- 1.5. We may collect Personal Data from other sources including service providers, partners, related third parties and publicly available sources.
- 1.6. If Customers provide Personal Data of a third party to Us, Customers must ensure that such third party has granted permission, consent, approval or confirmation as required by law and must explain and ensure that the third party understands how We will use their personal data. Customers shall bear all responsibilities and costs, losses (if any) arising from such provision of data, including but not limited to resolving disputes, complaints or claims from such third parties against Customers and Us, and shall indemnify Us against any direct and/or indirect losses relating to such complaints/claims/disputes.
- 1.7. If Customers is under 18 years of age, Customers must obtain consent from his/her parent, guardian or legal representative before providing Personal Data to Us. Such parent, guardian or legal representative shall be bound by this Notice and responsible for Customers’ actions. We reserve the right to refuse to provide services to Customers if there are grounds to believe that Customers is under 18 years of age and has not obtained the required consent.

2. COLLECTION AND USE OF COOKIES

We use cookies, pixels and other similar technologies (collectively referred to as “**cookies**”) to recognize Customers’ browser or device, learn more about Customers’ preferences, provide Customers with essential features and services, and for other additional purposes, including:

- a) Identifying Customers when Customers log in and/or use Our services. This enables Us to provide recommendations, display personalized content and offer other customized features and services.
- b) Taking into account Customers’ approved preferences. This allows us to respect Customers’ likes and dislikes, such as the language and configuration Customers chooses.
- c) Conducting research and analysis to improve our products, goods, and services.
- d) Preventing fraud.
- e) Improving security.
- f) Providing content, including advertisements, relevant to Customers’ interests on our website and third-party websites.
- g) Measuring and analyzing the quality of products, services, and goods.

Cookies enable Customers to take advantage of certain essential features provided by Us. For example, if Customers blocks or rejects our cookies, Customers may not be able to use certain products or services that require login, or Customers may have to manually adjust certain options or language settings each time Customers revisits the website.

Approved third parties may also place Cookies when Customers interacts with products, services or goods. Such third parties typically include search engines, measurement and analytics service providers, social networks and advertising companies. These third

parties use Cookies in the course of providing content, including advertisements relevant to Customers' interests, measuring the effectiveness of advertisements, and performing certain services on Our behalf.

Customers may manage browser Cookies through their browser settings. The "Help" feature on most browsers will tell Customers how to prevent their browser from accepting new Cookies, how the browser notifies Customers when they receive a new Cookie, how to disable Cookies, and when Cookies expire. If Customers disable all Cookies on their browser, neither We nor third parties will be able to transfer Cookies to Customers' browser. However, if Customers do so, they may have to manually adjust certain preferences each time they visit the websites and some features and services may not function properly.

3. PURPOSES OF COLLECTION AND SCOPE OF USE OF PERSONAL DATA

Customers agree that the Personal Data collected by Us from Customers will be used within the scope and for the following purposes, including but not limited to:

- 3.1 Providing and delivering products, goods and services and processing transactions relating to products, goods and services, including but not limited to registration, purchases, participation in promotional programs, incentives and payment processing.
- 3.2 Measuring usage, analyzing performance, troubleshooting errors, providing support, and improving and developing products, goods and services.
- 3.3 Recommending, advertising and providing information relating to products, goods and services that may be of interest to Customers, identifying Customers' preferences and personalizing Customers' experiences with products, goods and services.
- 3.4 Managing content, promotional programs, surveys or other features of websites, applications, devices or survey platforms.
- 3.5 Sending communications relating to the management of Customers' accounts and the features of websites, applications or devices.
- 3.6 Sending Customers information relating to transactions and Customers' needs in accordance with applicable laws.
- 3.7 Complying with requests of competent Government Authorities or requirements under applicable laws.
- 3.8 Verifying the identity of the account holder (if necessary) to ensure lawful and secure transactions.
- 3.9 Contacting Customers regarding issues arising (if any) in connection with products, goods or services.
- 3.10 Marketing and promoting products, goods and services in accordance with applicable laws, including displaying advertisements based on Customers' interests.
- 3.11 Verifying technical and security information relating to Customers' Personal Data.
- 3.12 Inspecting, verifying, detecting, preventing and protecting against fraud, identity theft or other illegal activities.
- 3.13 Establishing and enforcing legal rights or resolving and handling Customers' complaints in order to improve the quality of goods and services; protecting Our legitimate rights and interests; and providing information to organizations and competent Government Authorities (upon request) for the purposes of investigation, inspection, examination, consultation or audit.
- 3.14 Video recordings and images captured by surveillance cameras or photographic devices (which may use AI technology or other technologies), in certain cases, also being used for the following purposes: (i) quality assurance purposes; (ii) public security and occupational safety purposes; (iii) detecting and preventing suspicious, inappropriate or unauthorized use of Our utilities, products, services and/or facilities; (iv) detecting and preventing criminal acts; and/or (v) conducting investigations into incidents upon request of competent Government Authorities.

- 3.15 Serving the purposes specified in Section 5 of this Notice.
- 3.16 Serving other reasonable purposes for Customers.
- 3.17 Serving any other purposes specific to Our business operations.
- 3.18 Notifying Customers of the purposes and scope of collection, use and processing of Personal Data by any other means as notified by Us to Customers at the time of collection of Customers' Personal Data, prior to the commencement of relevant processing activities, or as otherwise required or permitted under applicable laws.

4. RETENTION PERIOD OF PERSONAL DATA; DELETION AND DESTRUCTION OF PERSONAL DATA

- 4.1. Customers' Personal Data shall be kept confidential and stored on the servers of the electronic information website or within Our data storage systems until a request for deletion or destruction of such data is made by Customers, or as otherwise required by applicable law.
- 4.2. The deletion or destruction of Personal Data shall not apply, notwithstanding any request from Customers, in the following cases that:
 - a) Personal Data is stored or processed to protect the life, health, honor, dignity, rights, or lawful interests of Customers or another individual in an emergency situation; or to protect Our legitimate rights or interests, those of other individuals, or the interests of the State or organizations where necessary against acts infringing such interests;
 - b) Personal Data is stored or processed for the purpose of addressing an emergency situation; responding to threats to national security that have not yet reached the level requiring the declaration of a state of emergency; or for the prevention and control of riots, terrorism, crimes, or violations of law;
 - c) Personal Data is stored or processed to serve the operations of Government Authorities or Government management activities in accordance with applicable law;
 - d) Personal Data is stored or processed for the purpose of performing agreements between the personal data subject and relevant agencies, organizations, or individuals in accordance with applicable law;
 - e) Applicable law does not permit the deletion or destruction of Personal Data.

5. METHODS OF SHARING AND TRANSFERRING PERSONAL DATA

Customers agree that We may use Customers' Personal Data to (i) operate, provide, and improve products, goods, and services or perform contractual arrangements, and (ii) directly or on behalf of Customers provide Customers' Personal Data to other organizations or individuals for the following purposes:

- 5.1 As specified in Section 3 of this Notice.
- 5.2 We provide Customers with services, software, and content supplied by third parties for use in connection with or through the products, goods, or services.
- 5.3 We engage and/or cooperate with other organizations and individuals to carry out certain activities and programs for Customers, such as promotional programs, cross-selling programs, and similar initiatives. These third-party service providers may have access to necessary Personal Data and/or may receive Personal Data shared or transferred by Us in order to perform their functions in accordance with their agreements with Us, but they are not permitted to use such data for any other purposes.
- 5.4 In the course of business development, We may sell or acquire businesses, restructure our business, or buy or sell services, assets, or business segments in accordance with applicable law. In such transactions, Personal Data may be transferred together with the relevant business; however, the receiving party must continue to comply with the

provisions of this Notice or obtain Customers' consent if there are any differences from the provisions of this Notice.

5.5 We may disclose Personal Data where We believe such disclosure is appropriate to comply with the law, to enforce or apply Our terms and other agreements, or to protect the rights, property, or safety of Us, Our customers, or any other persons. This may include exchanging information with other companies and organizations for the purposes of fraud prevention and detection and reducing asset and credit risks.

5.6 In addition to the cases above, Customers shall be notified when Personal Data may be shared with a third party, and Customers shall have the right to refuse or withdraw consent to such sharing or transfer of data, except where consent is not required under applicable law.

5.7 All partners receiving Personal Data shall be bound by confidentiality agreements and may only use such data for the purposes specified and agreed upon by Us

6. METHODS OF PROTECTING PERSONAL DATA

6.1. We undertake to using Customers' Personal Data strictly in accordance with the provisions set out in this Notice.

6.2. We undertake to apply appropriate administrative and technical measures to store and protect the data that We collect and maintain, in compliance with applicable standards and technical regulations on network information security. In the event such data is attacked by hackers resulting in the destruction, disclosure, or alteration of Customers' Personal Data, We will promptly notify the competent authorities for investigation and handling and inform Customers accordingly.

6.3. Customers bank account data and payment card information issued by financial institutions are protected in accordance with international standards. We follow the principle of not storing sensitive payment card data (such as card number, cardholder name, and CVV) on Our systems. Customers payment transactions are processed through the systems of the relevant banks.

6.4. However, please note that the Internet is not an absolutely secure environment, and We cannot guarantee that Personal Data shared via the Internet will always remain secure. When transmitting Personal Data over the Internet, Customers should only access websites, applications, or devices through secure systems. Customers are responsible for safeguarding their authentication and access credentials for each website, application, and device. Customers must immediately notify Us if they detect any misuse of login information and promptly change their access passwords.

6.5. Customers agree to release Us from liability in cases where force majeure events arise (if any) beyond Our control that affect or result in the loss of Customers' Personal Data.

7. INTERNET ADVERTISING AND THIRD PARTIES

Our website/electronic application may include advertisements from third parties and links to other websites and applications. Third-party advertising partners may collect data about Customers when Customers interact with their content, advertisements, or services. Customers have the right to opt out of viewing advertisements in accordance with the instructions provided on the relevant advertising platforms or by other methods as provided under agreements applicable to Customers.

Please note that We do not control and are not responsible for the privacy policies of these third-party websites or linked pages. Customers should carefully review the privacy and personal data protection policies of such third-party websites before providing any information (if requested).

8. CUSTOMERS RIGHTS REGARDING PERSONAL DATA

8.1 Customers have all rights of personal data subjects in accordance with applicable laws with respect to their Personal Data.

- 8.2 Customers may view, update, modify, and delete certain data relating to their accounts and interactions with products, goods, and services through one of the following methods:
- a) Logging into Customers data management page to directly edit or delete Customers' data.
 - b) Calling the hotline: We will assist in adjusting or deleting the data in accordance with the provisions of this Notice and applicable laws.
 - c) Leaving comments or feedback directly through Our website or electronic application; We will review the data and contact Customers to verify the information and proceed with the correction/deletion of Customers' data once the data has been fully and accurately verified.
- 8.3 Our website and application may include features that allow Customers to choose how their data is used. Customers may choose not to provide Personal Data; however, in such cases, Customers may not be able to use certain features of the website/application.
- 8.4 In addition to exercising the rights relating to Personal Data that are made available on Our website or electronic application as described in Section 8.2 above, for other rights, Customers may submit a written request to Our registered office address or email to specify their requests. Upon receipt of Customers' request, We will contact Customers and inform Customers of any limitations, consequences, or potential damages that may arise from fulfilling such request before proceeding with the request.
Registered office address: An Son Hamlet, Ba Na Commune, Da Nang City, Vietnam
Email for receiving requests: sm@banahillsgolf.com

9. CUSTOMER OBLIGATIONS REGARDING PERSONAL DATA

Customers have the following obligations:

- 9.1 Complying with applicable laws and with Our regulations and guidelines relating to their Personal Data.
- 9.2 Being responsible for the data and consents that they create or provide in the online environment, and bearing responsibility in cases where Personal Data is leaked or infringed due to their own fault.
- 9.3 Providing complete and accurate Personal Data in accordance with applicable laws, contractual requirements, or when consenting to the processing of their Personal Data.
- 9.4 Complying with applicable laws on personal data protection and participating in the prevention of activities that infringe upon Personal Data.

10. POTENTIAL UNWANTED CONSEQUENCES AND DAMAGES

- 10.1 Potential unwanted consequences: Personal Data may be disclosed to other parties without Customers' consent; or third parties may gain access to the Personal Data and use it for purposes without Customers' consent.
- 10.2 Possible unwanted damages: Loss of property or infringement of Customers' honor and reputation.
- 10.3 Other consequences or damages that We cannot foresee due to objective causes.

11. CONTACT INFORMATION

If Customers have any questions regarding privacy or wish to contact Our data controller, please contact Us through the contact channels published on Our website, electronic application, or via the customer service hotline so that We can respond as soon as possible.

12. GENERAL PROVISIONS

By performing actions indicating consent on Our website, electronic application, or device, Customers acknowledge that they have clearly understood and agreed to the entire contents of this Notice. In the event that Customers do not accept the terms or withdraw their consent to the processing of their Personal Data for the purposes set out in this

Notice, such withdrawal of consent may result in the provision of products, services, goods, or the features on Our website, application, or device being limited, restricted, suspended, terminated, prevented, or prohibited, as applicable. In such case, Customers acknowledge that: (i) they shall be responsible for any loss, damage, or harm arising from or related to such decision; (ii) any Personal Data processed prior to the withdrawal of consent will not be affected; (iii) they shall defend, indemnify, and hold Us harmless from any disputes, claims, or damages related to such decision; and (iv) Our legal rights shall be expressly reserved with respect to such limitation, restriction, suspension, termination, prevention, or prohibition.

We reserve the right to amend, modify, supplement, or update this Notice at any time as necessary, and such updates will be dated so that Customers can identify the most recent version. The updated version will be published on Our website and/or through other communication channels that We deem appropriate. We recommend that Customers regularly review this Notice to stay informed about how We protect Customers' Personal Data. Customers' continued use of the website, application, or device shall be deemed as continued use of Our products, goods, and services and acceptance of this Notice and any relevant amendments or supplements.

This Notice shall be governed by and construed in accordance with the laws of Vietnam. If Customers have any complaints relating to the collection, use, or processing of Personal Data, Customers are encouraged to contact Us so that the parties may discuss and resolve the matter in good faith and with mutual respect for each other's rights and interests. If within 03 (three) months from the date Customers request negotiation to resolve the dispute, or within a shorter reasonable period to promptly protect the Customers' Personal Data, the Parties fail to reach an agreement, Customers shall have the right to request a competent court in Vietnam to resolve the dispute.