

PRIVACY NOTICE OF TAKENAKA VIETNAM COMPANY LIMITED TO CUSTOMER

Effective date: 02/10/2023

Please read this privacy notice (“**Notice**”) carefully to understand our policies and how We process Customers’ Personal Data. This Notice applies to individuals and/or organizations who interact with the services of Takenaka Vietnam Company Limited (“**Takenaka**” or “**We**”) as customers (“**Customers**”).

1. GENERAL RULES

- 1.1. **Personal Data** is information in the form of symbols, letters, numbers, images, sounds or similar forms in the electronic environment that is associated with a specific person or helps identify a particular person and is specified explicitly in this Notice.
- 1.2. **Personal Data Subject** is the individual to whom the Personal Data reflects, including all individual Customers and/or the related persons of the organization using Takenaka's products and/or services.
- 1.3. **Personal Data Controller** means Takenaka, which has the right to decide the purposes and methods for processing Personal Data.
- 1.4. **Personal Data Processor** is Takenaka or organization, individual that performs Personal Data processing on behalf of the Takenaka, through a contract or agreement with Takenaka
- 1.5. **Personal Data Controller And Processor** is Takenaka, which has the right to decide the purpose, means and direct Personal Data process.
- 1.6. **Third Party** means an organization or individual other than Customers and Takenaka authorized to Personal Data process.
- 1.7. **Personal Data Processing** is one or more activities affecting Personal Data such as collection, recording, analysis, confirmation, storage, editing, disclosure, combination, access, retrieve, revocation, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction of Personal Data or other related actions.

By registering to use, using Takenaka's products and services, entering into a contract and/or allowing Takenaka to process Personal Data, Customers accept all and without any conditions the policies mentioned in This Notice and changes (if any) in each period.

- 1.8. The Customers will spread out the content of this Notice to your related parties (including your employees and/or other non-employees) interacting with Takenaka services as designated by the Customers (“**Notified Persons**”) (in case the Customers



are individual, the Notified Persons also includes the Customers) and warrant that the Notified Persons have read, understood, and accepted the content of this Notice.

- Takenaka may process the Personal Data of the Notified Persons for the purposes and in the manner set out in this Notice;
- In all cases, Takenaka's notices relating to the Personal Data of the Notified Persons sent to the Customers are meant to have been sent to the Notified Persons; the Customers' agreement or disagreement is meant the agreement or disagreement of the Notified Persons; and
- Within the scope of this Notice and its amendments (if any), Personal Data of the Customers or the Notified Persons is collectively referred to as Customers' Personal Data or Personal Data provided by the Customers.

2. SCOPE OF NOTICE

Within the scope of this Notice, Takenaka notifies the Customers:

- a) Purposes of Personal Data Processing;
- b) Types of Personal Data processed;
- c) Methods and sources in which Takenaka conducts Personal Data Processing;
- d) Customers' rights and responsibilities about Customers' Personal Data protection;
- e) This Notice describes methods by which Takenaka collects and uses Customers' Personal Data. This Notice also describes methods by which the Customers can access and update their Personal Data and decide how Customers' Personal Data will be used. This Notice may change from time to time.
- f) This Notice also describes methods by which the Customers collect and use Personal Data provided by Takenaka.

3. SOURCES OF PERSONAL DATA

Takenaka or Takenaka's Personal Data Processors or Third Parties are authorized to process data for Takenaka may collect Personal Data from the Customers when the Customers request, or during Takenaka's provision of products and services to the Customers, and from many sources and vice versa, including but not limited to:

- a) Websites operated by, or for Takenaka, including but not limited to pages that Takenaka operates under domains/URLs and microsites that Takenaka runs on social networks of other parties such as Facebook ("**Websites**").
- b) Emails, phone messages or other electronic messages through interactions between the Customers and Takenaka electronically.

- c) Paper registration forms or electronic forms and similar forms that Takenaka collects, for example, postal mail, contests, events, and other promotional activities.
- d) From other sources such as third-party social networks (Facebook, Zalo, Instagram, Google, etc.), market research (if feedback is not provided anonymously), other parties collecting data, Takenaka's partners, open sources, and data acquired when Takenaka acquires other companies.
- e) From service providers, partners, and consultants of Takenaka, including but not limited to the party conducting the survey, social media, marketing, fraud prevention, data collection; technology facilities and infrastructure support parties, and other parties related to Takenaka's business operations;
- f) Through written or verbal communication between the Customers and Takenaka and/or with individuals/organizations authorized by Takenaka;
- g) From another party related to the Customers, such as biological father, biological mother, mother-in-law, mother-in-law, husband and/or wife.
- h) From archived videos from camera systems and surveillance cameras at Takenaka's business locations.

4. TYPES OF PERSONAL DATA PROCESSED

Depending on the methods by which the Customers interact with Takenaka (online, offline, by phone, etc.), Takenaka will collect the following Personal Data:

4.1. Basic Personal Data includes:

- a) Full name, middle and birth name, other names (if any);
- b) Date, month, year of birth; date, month, year of death or disappearance;
- c) Gender;
- d) Place of birth, place of birth registration, permanent residence, temporary residence, current residence, hometown, contact address;
- e) Nationality;
- f) Images of individuals, information obtained from security systems, including Customers' image recordings on camera systems and surveillance cameras at Takenaka's business locations;
- g) Phone number, identity card number, personal identification number, passport number, driver's license number, license plate number, personal tax code, social insurance number, health insurance card number;
- h) Marital status;
- i) Occupation, workplace;

- j) Information about family relationships (parents, children);
- k) Information about the individual's digital account; personal information reflecting activities and activity history in cyberspace (IDs and passwords, IP addresses, device serial numbers, cookie(s), etc.);
- l) Account information, such as IDs and passwords of users, Customers' account usage history, and detailed information about products or services the Customers have purchased or consulted with Takenaka;
- m) Information about banking, payment, and finances for Takenaka to complete contracts, transactions, orders, or information the Customers use to make purchases (such as debit card information, credit card information or other forms of payment). In all cases, Takenaka and the payment service provider will process banking, payment and financial information following the law; or
- n) Technical information and web data such as Customers' Internet protocol (IP) address, login data, browser type and version, time zone setting and location, types and versions of a browser plug-in, operating system and platform, international mobile device version, device identifier, how Customers use and view any content on Takenaka's Website and information and technology on the devices Customers use to access Takenaka's Website.

4.2. Sensitive Personal Data:

- a) Voices of the Customers: calls to Takenaka's customer care department may be recorded for internal administrative purposes (such as employee skills training) and fully comply with the Customers' requests;
- b) Geographic location information is collected by Takenaka to carry out contracts, transactions, orders, or related obligations that the Customers and Takenaka have agreed upon;
- c) Information about monthly or annual income provided by the Customers;
- d) Health status and private life recorded in medical records, excluding information about blood type;
- e) Religious or philosophical views and beliefs; or
- f) Personal preferences in color, architectural style, and construction.

5. CHILDREN'S PERSONAL DATA

Takenaka does not proactively collect Personal Data from children under 18 years of age. When there is a request to collect to serve the performance of services or provide products for the Customers, Takenaka will collect directly from the Customers if the Customers are fathers or mothers of the children, or the children's legal guardians in compliance with all relevant laws on protection of children's Personal Data.

6. PURPOSE OF PROCESSING PERSONAL DATA

Personal Data may be processed by Takenaka or Takenaka's Personal Data Processors, or Third Parties authorized to process data for Takenaka for one or more of the following purposes:

- a) Evaluate and provide Takenaka's products, and services for the Customers;
- b) Perform obligations in contracts, agreements, appendices, terms, conditions and other documents between Takenaka and the Customers;
- c) Understand Customers' needs to improve Takenaka's products or services;
- d) To verify and execute financial transactions made online in connection with payments, and to determine Customers' identity for anti-money laundering, suspicious transaction reporting and detection purposes;
- e) To send advertising/promotional material to the Customers through any Takenaka employee or communication channel, directly or indirectly via advertising and strategic partners;
- f) Comply with laws and international treaties to which Vietnam is a member;
- g) Prevention, combat, and containment of crime;
- h) Ensure the legitimate rights and interests of Takenaka and Takenaka group;

7. PROVISION OF PERSONAL DATA:

To carry out the purposes of Personal Data Processing stated in this Notice, Takenaka may provide Personal Data to the following parties:

- a) Takenaka's member units include affiliated units, subsidiaries, joint venture companies, affiliated companies, and companies under the Takenaka Group;
- b) Contractors, agents, service providers, consultants, design companies and/or service providers supporting Takenaka's operations (completing contracts, transactions, orders, payment processing, implementation of marketing and promotional programs, fraud detection and identity verification, website operators, market research companies, web development, data analysis, etc.). Service delivery partners and their designated employees are only authorized to access and use Customers' Personal Data on behalf of Takenaka and as directed by Takenaka for the necessary tasks within their service scope. They are also committed to maintaining the confidentiality and safety of the Customers' Personal Data;
- c) Credit reporting agencies/debt collection agencies assist Takenaka in verifying the reliability of the Customers' ability to pay debts to Takenaka, to the extent permitted by current law, Credit reporting agencies and debt collection agencies are outside companies that Takenaka uses to verify customer creditworthiness or ability to collect unpaid invoices.

- d) Other parties that receive Personal Data are used for legal purposes such as mergers, splits, amalgamations, and company transfers. Takenaka will disclose the Customers' Personal Data to other parties in compliance with the law or in the event of a merger or acquisition.
- e) Competent authority requests information according to legal regulations;
- f) Any court, arbitrator, litigation, or judgment enforcement agency has authority/requests the enforcement of responsibilities from Takenaka;
- g) Other parties authorized by the Customers to work with Takenaka on the Customers' behalf.

8. METHODS FOR PERSONAL DATA PROCESSING

Depending on the purposes of Personal Data Processing, Takenaka, the Personal Data Processors and/or Third Parties authorized to conduct Personal Data Processing for Takenaka may apply appropriate methods for Personal Data Processing as follows:

- Online: Customers' personal data is collected through Customers' activities on Takenaka's Website.
- Manually at Takenaka's business networks and headquarters or through communication systems, including but not limited to email, text messages, chat rooms, in-person meetings, online meetings, and /or other means of communication (e.g.: Zalo, WhatsApp, Viber, Telegram, etc.)
- Recording audio or video through calls or online meetings between Takenaka's staff and the Customers and asking for Customers' permission for such audio or video recording.

Personal Data after collection will be stored in Takenaka's or a Third Party's data system and guaranteed securely under Takenaka's management.

9. PERSONAL DATA PROCESSING PERIOD

Depending on the specific activity, Personal Data may be processed by Takenaka after it is provided, collected, and terminated upon completion of the Personal Data Processing following the purposes for which it was carried out, or until Personal Data has been deleted following Vietnamese law.

10. FURTHER COLLECTION, MANAGEMENT AND STORAGE AND/OR TRANSFER OF CUSTOMERS' PERSONAL DATA

- 10.1. If it is necessary to collect additional Personal Data from the Customers, Takenaka will request the Customers' consent beforehand. Takenaka will use the most appropriate methods to collect and store Customers' Personal Data in a secure and confidential manner to minimize any potential risks. These risks include the improper collection and

processing of Personal Data that goes against legal regulations. Please be aware that these protections do not apply to information that the Customers choose to share in public and public places.

- 10.2. Takenaka's Personal Data Protection Department (“**PDPD**”) is responsible for managing and storing Customers’ Personal Data. All members of the PDPD have professional expertise and are trained in data collection, management, and processing. However, it is important to note that the transmission of information via the Internet is not absolutely secure. Even though We are dedicated to protecting Customers’ Personal Data to the best of our ability, We cannot guarantee the security of data transmitted through our website/app.

Takenaka encourages the Customers to take the following precautions: the Customers also play important roles in keeping their Personal Data secure and confidential. When registering for online accounts, please ensure that the Customers have chosen highly secure passwords and do not disclose them to anyone. The Customers must be responsible for the accounts’ use and password confidentiality of the registered accounts. If the Customers use shared or public computers, please do not choose to remember the Customers’ login ID/login email addresses or passwords and ensure that the Customers are logged out of the Customers’ accounts before leaving the computers. The Customers should also set or control privacy settings on our website/application.

- 10.3. Transfer of Customers’ Personal Data: Because of the interconnectedness and corporate organizational structure of Takenaka's production and business activities, We may need to transfer the Customers’ Personal Data to the internal Takenaka Group (including Takenaka Corporation), and to other parties mentioned above, in connection with the purposes set out in this Notice. Accordingly, when the event of transferring Customers’ Personal Data occurs, Takenaka will commit to complying with current legal regulations and the laws of the host country to which Personal Data is transferred.

11. CUSTOMERS’ RIGHTS AND OBLIGATIONS

- 11.1. Takenaka respects and endeavors to protect the following rights of the Customers:

- a) The Customers have the right to request Takenaka to edit or cancel Customers’ Personal Data.
- b) The Customers are informed about the processing of Customers’ Personal Data and agree or disagree with the processing of Customers’ Personal Data in cases where the law does not provide otherwise;
- c) The Customers are accessed for viewing, editing, copying, or requesting the correction of their Personal Data which is processed by Takenaka or on behalf of Takenaka unless otherwise provided by law. However, these rights may be limited, for example, if the fulfilment of the Customers’ requests will disclose another person's information, or if the Customers request Takenaka to delete

information that must be retained as required by law or has a legitimate interest in retaining;

- d) The Customers have the right to withdraw Customers' consent in cases where the law does not provide otherwise;
- e) The Customers have the right to request Takenaka to delete Personal Data when Takenaka does not have the right to process Personal Data under law or is no longer necessary to process such Personal Data for the purpose for which Personal Data was collected in cases where the law does not provide otherwise;
- f) Customers are required to restrict the processing of Customers' Personal Data, the restriction of processing of Personal Data is carried out within seventy-two (72) hours after the Customers' request, with all Personal Data that the Customers request to limit unless otherwise provided by law;
- g) In cases where the law does not provide otherwise, if the Customers realize that Customers' Personal Data may or be used for advertising or marketing purposes or is at risk of being disclosed to outside parties, the Customers have the right to report to Takenaka's PDPD to promptly prevent or limit risks. The Customers' requests need to be made within seventy-two (72) hours from the time the PDPD receives the request;
- h) Right to request rectification of any inaccurate information in Customers' Personal Data;
- i) The Customers have the right to complain, denounce or sue if they feel that their rights and interests related to Personal Data have been violated;
- j) The Customers have the right to request compensation for damages according to the provisions of the law when violations of regulations on the protection of their Personal Data occur in cases where the law does not provide otherwise.
- k) The Customers have the right to be notified of a breach of confidentiality obligations relating to Personal Data;
- l) Other rights as prescribed by current law.

When exercising these rights, please attach copies of the ID Cards or equivalent personal legal documents (Passport/temporary residence cards, etc.). If these requests are made by persons other than the Customers who fail to provide evidence that the request is lawfully made on the Customers' behalf, the request will be denied. Please note that any identifying information provided to Takenaka will be processed only to the extent permitted by applicable law. Takenaka hopes to be able to answer questions about methods by which Takenaka processes Customers' Personal Data.

11.2. Customers' responsibilities:

- a) Protect Customers' Personal Data; require other relevant organizations and individuals to protect their Personal Data;

- b) Respect and protect the Personal Data of others;
- c) Provide complete and accurate Personal Data to Takenaka when agreeing or allowing Takenaka to collect, process and/or use Customers' Personal Data;
- d) Notify Takenaka or Takenaka's PDPD if the Customers discover or suspect that their Personal Data has been leaked, which may lead to risks in the process of using Takenaka's services or any other violation of the protection of Personal Data following this Notice;
- e) Implement legal regulations on personal data protection, participate in preventing and combating violations of Personal Data regulations;
- f) Regularly check Takenaka's Website for updates and make changes (if any) related to Personal Data;
- g) The Customers are also responsible for protecting the confidentiality of Personal Data that Takenaka has provided following the law, This Notice and according to the Customers' commitment to Takenaka;
- h) Other obligations according to current legal regulations on Personal Data protection.

12. PRIVACY STATEMENT

Takenaka is committed to complying with the following principles when processing Personal Data:

- a) Takenaka commits to processing and securing Personal Data following Vietnamese law; comply with the regulations stated in This Notice and other agreements (if any) with the Customers;
- b) Takenaka only collects Personal Data to the extent that it is appropriate and necessary for the purposes stated in the provisions of this Privacy Notice. Takenaka always maintains appropriate measures to ensure the safety, integrity, accuracy, and confidentiality of the information provided by the Customers;
- c) The PDPD and other Takenaka departments always learn, apply, and improve techniques and/or update Personal Data management and protection systems to ensure the safety of Personal Data ;
- d) In addition, We also take appropriate measures to ensure that Third Parties with the right to carry out Personal Data Processing also use measures to ensure the security of Personal Data that Takenaka provides or transfers to them;

13. CHANGES TO THIS NOTICE

Takenaka's Privacy Notice may be updated occasionally to suit the needs and current legal regulations. If Takenaka changes the way it processes Customers' Personal Data,

Takenaka will update this Notice, please check regularly for updates or changes to the Notice.

14. METHODS TO CONTACT

If the Customers have any questions, concerns or complaints about this Notice or the processing and/or protection of Personal Data, please contact Takenaka by one of the following methods:

a) Send an e-mail to Takenaka's PDPD at DPD@takenaka.com.vn

b) Send mail to us at:

– PDPD

TAKENAKA VIETNAM COMPANY LIMITED

4th Floor, Room 402, HD Tower Building, 25 Bis Nguyen Thi Minh Khai,
Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam

c) Hotline + 849 0663 3029, operating 24/7 and is responsible for managing all incidents and security situations.

TAKENAKA VIETNAM COMPANY LIMITED

(Sign and seal)



Daisuke Tanaka
General Director