PERSONAL DATA PROCESSING NOTICE

This Personal Data Processing Notice sets out how Ho Tram Project Co., Ltd. ("HTP") collects and processes your personal data in connection with your booking and use of the golf course and facilities at The Grand Ho Tram. It also outlines your rights as a data subject and HTP's obligations under the Law on Personal Data Protection No. 91/2025/QH15, Decree No. 356/2025/ND-CP and other applicable laws ("PDP Laws").

The following information is provided in accordance with applicable personal data protection laws:

1. **Processing Purposes** ("**Purposes**")**:** HTP processes personal data for two categories of purpose, as separately set out in the above consent checkboxes:

   (a) **Service Provision and Legal Compliance -** including booking and reservation management, caddie and golf cart allocations, contract performance, customer support, internal audit and risk management, premises security and safety (including via CCTV surveillance), and compliance with applicable laws and competent authority requests;

   (b) **Marketing and Promotional Activities** - sending newsletters, promotional communications, offers and event information about HTP's own products and services (including golf, accommodation, dining, entertainment and resort services) via email, SMS, telephone calls and/or messaging applications (such as Zalo or WhatsApp), using the contact details you provide. This processing is carried out only if you give your separate and voluntary consent by ticking the relevant box; refusing such consent will not affect your golf booking or your use of HTP's services. HTP will not transfer your personal data to any third party for that party's own advertising purposes without your separate consent. You may refuse to receive marketing communications or withdraw your consent at any time by contacting data.privacy@thegrandhotram.com, whereupon HTP will stop sending marketing communications to you. Withdrawal will not affect your golf booking or the lawfulness of any processing carried out before withdrawal.

2. **Personal Data Processed:** Personal data that you provide or that is generated in connection with your booking or use of the golf course and facilities, including: full name; phone number; email address (optional); nationality; and images and recordings captured by CCTV systems located in and around the golf course, used to ensure safety and security on premises. Where you voluntarily provide data relating to a third party (such as accompanying guests), you confirm that such person has been informed of and consented to the processing described in this Notice.

3. **Methods of Processing:** HTP processes personal data using both automated and manual methods, including one or more of the following: collection, analysis, summary, encryption, decryption, modification, deletion, destruction, de-identification, provision, disclosure, transfer of personal data, and other activities impacting personal data. All personal data of Customers will be stored in HTP's Customer database system, which is accessible only to authorized personnel and solely for the Purposes. In the event that personal data is transferred across borders for one or more of the aforementioned Purposes, HTP commits to complying fully with all applicable personal data protection regulations.

4. **Organizations and Individuals Permitted to Process Personal Data:** HTP, HTP's professional departments and offices; other service providers engaged for operational and service delivery purposes (including but not limited to CMC Technology and Solutions Corporation Limited, insurers (*if any)*); and competent state authorities to whom HTP and its offices are obligated to provide information in accordance with their duties and/or the laws of Vietnam. When processing the Customer's personal data for the aforementioned Purposes, HTP assumes the role of Personal Data Controller where HTP determines the purposes and means of processing personal data; or Personal Data Controller-cum-Processor where HTP determines the purposes, means, and directly processes personal data.

5. **Potential risks and unintended consequences:** Although we have implemented robust security measures, please be advised that data transmitted over the Internet may not be entirely secure. To the extent permitted by law, HTP shall not be liable for any loss or damage arising from your own voluntary disclosure of your personal data, or from unauthorized access, incidents or technical failures beyond HTP's reasonable control, provided that HTP has implemented the personal data protection measures required under the PDP Laws.

6. **Your Rights:** Subject to applicable law, you have the right to: (i) be informed of the processing of your personal data; (ii) consent, refuse, or request withdrawal of consent (without affecting the lawfulness of processing prior to withdrawal) to the personal data processing access your personal data held by HTP; (iii) view, modify, or request modification of their personal data request correction of inaccurate or incomplete data; (iv) request provision, deletion, and restriction of personal data processing; to object to personal data processing request deletion of your personal data where permitted by law; (v) restrict or object to the processing of your personal data; (vi) complain, denounce, initiate lawsuits, or claim damages according to the law request a copy of your personal data in a structured, machine-readable format (data portability); (vii) withdraw your consent at any time (without affecting the lawfulness of processing prior to withdrawal); and (viii) request competent authorities or agencies, organizations, or individuals relevant to personal data processing to adopt solutions and measures to protect the personal data according to the law lodge a complaint with the competent authority.

   Please note that certain rights, including the right to request deletion or destruction of personal data and the right to withdraw consent, may be restricted or unavailable in certain circumstances as required by applicable law. To exercise any of the above rights, please contact HTP using the details below.

7. **Your Obligations:** Subject to applicable law, you have the obligations to: (i) protect your personal data; and (ii) respect and protect the personal data of others; and (iii) adequately and accurately provide your personal data according to the law, contracts, or upon your consent to the processing of your personal data; and (iv) comply with personal data protection laws and participate in the prevention and combat against personal data infringement.

8. **Duration of personal data processing:** HTP will retain your personal data for as long as necessary to fulfil the Purposes described in this Notice, and for such further period as may be required or permitted by applicable law (including statutory retention periods applicable to tax and accounting records, Waiver and compliance records). Upon expiry of the applicable retention period, your personal data will be securely deleted or de-identified.

For further information, please visit https://thegrandhotram.com/privacy-policy or contact our Data Protection Officer at data.privacy@thegrandhotram.com.