

PERSONAL DATA PROTECTION POLICY

GMO-Z.com RUNSYSTEM Joint Stock Company, with its head office at 6th Floor, Ocean Park Building, No. 01 Dao Duy Anh, Kim Lien Ward, Hanoi City, Vietnam (“**GMO-Z.com RUNSYSTEM**”) always respects privacy and endeavors to protect the Personal Data of its Partners in accordance with Vietnamese law and the strict requirements of the GMO Internet Group.

This Personal Data Protection Policy (“**Policy**”) provides for Personal Data protection, the rights and obligations of relevant organizations and individuals regarding the protection of Personal Data, as well as transparent notification to Data Subjects, organizations and individuals to all information related to the processing of Personal Data at GMO-Z.com RUNSYSTEM. Please note that the collection, processing of your Personal Data is a necessary and sufficient condition for GMO-Z.com RUNSYSTEM to provide products and services to the Partner.

1. TYPES OF PERSONAL DATA BEING PROCESSED

Personal data (“**Personal Data**”) refers to digital data or information in other forms that identifies or assists the identification of a specific individual, or is otherwise defined as personal data under applicable laws from time to time. This may include Partner’s data or data lawfully collected from other subjects and permitted to be transferred by Partner. The types of Personal Data to be processed are one or more of the categories listed below and may vary from time to time depending on the relationship between the Partner and GMO-Z.com RUNSYSTEM:

- 1.1. Basic Personal Data: Last name, middle name and first name, other names (if any); Date of birth; date of death or going missing; Gender; Place of birth, registered place of birth; place of permanent residence; place of temporary residence; current place of residence; hometown; contact address; Nationality; Personal image; Phone number; ID Card number, personal identification number, passport number, driver’s license number, license plate, taxpayer identification number, social security number and health insurance card number; Marital status; Information about the individual’s family relationship (parents, children); Digital account information; personal data that reflects activities and activity history in cyberspace; Information associated with an individual or used to identify an individual other than that specified in Sensitive personal data mentioned in this Policy;
- 1.2. Sensitive Personal Data: Political and religious opinions; Health condition and personal information stated in health record, excluding information on blood group; Information about racial or ethnic origin; Information about genetic data related to an individual's inherited or acquired genetic characteristics; Information about an individual’s own biometric or biological characteristics; Information about an individual’s sex life or sexual orientation; Data on crimes and criminal activities collected and stored by law enforcement agencies; Other specific Personal Data as prescribed by law that requires special protection; Other information associated with a specific Partner or enabling the identification of a specific Partner shall be deemed sensitive Personal Data in accordance with the law.

2. PURPOSE OF PROCESSING PERSONAL DATA

Unless otherwise agreed in writing, GMO-Z.com RUNSYSTEM may process Personal Data for one or more of the following purposes (“**Purpose**”):

- 2.1. Compliance with all applicable legal documents, regulations, rules, official dispatches, directives, dictates, instructions and/or requests from any local or foreign competent authority any agency, including regulatory, government, tax and law enforcement or other authorities. Compliance with international treaties to which Vietnam is a member.
- 2.2. For GMO-Z.com RUNSYSTEM to maintain quality, provide its utilities and products, and manage business relationships and other relationships:

- To determine, appraise and approve the provision of products or services; to consider entering into contracts/agreements; to perform contracts/agreements with the Partner; and/or to settle obligations arising with the Partner after the termination of such contracts/agreements. To manage GMO-Z.com RUNSYSTEM's business relationship with the Partner and/or other partner;
- To monitor infrastructure, products and services provided by GMO-Z.com RUNSYSTEM or provided through GMO-Z.com RUNSYSTEM;
- To make and manage payments, manage legal and financial risks, including resolving legal disputes;
- To carry out internal management and other business operations, regulatory reporting, management reporting, audit purposes, and record retention.

2.3. Security and risk management by GMO-Z.com RUNSYSTEM:

- To prevent crime and manage security, protect information and prevent fraud/money laundering and terrorism financing as prescribed;
- To conduct internal audit activities as prescribed;
- To create data, reports and statistics for GMO-Z.com RUNSYSTEM or as requested by competent authorities or for other authorized third parties of GMO-Z.com RUNSYSTEM.

2.4. For GMO-Z.com RUNSYSTEM to research, develop products, and implement incentive programs for the Partner:

- To conduct research, planning and statistical analysis for the purposes of developing or improving GMO-Z.com RUNSYSTEM's products, services, security, service quality, advertising strategies, or other strategies;
- To provide, implement, and administer promotional and incentive programs in connection with the Partner's participation in or use of GMO-Z.com RUNSYSTEM's products and services.

2.5. For other purposes as agreed between the Partner/Data Subject and GMO-Z.com RUNSYSTEM.

3. METHODS OF PROCESSING PERSONAL DATA

3.1. For the Purpose stated in this Policy, GMO-Z.com RUNSYSTEM may carry out one or more activities affecting Personal Data, including: collect, analyze, aggregate, encrypt, decrypt, edit, delete, destroy, de-identify, provide, disclose, transfer personal data or other related actions.

3.2. Depending on the purpose of processing Personal Data, GMO-Z.com RUNSYSTEM, its data processor, or a third party authorized to process data for GMO-Z.com RUNSYSTEM may apply appropriate processing methods, including but not limited to automated processing, manual processing, or other methods in accordance with applicable laws and GMO-Z.com RUNSYSTEM's regulations from time to time.

3.3. GMO-Z.com RUNSYSTEM commits to complying with the following principles when processing Personal Data:

- GMO-Z.com RUNSYSTEM processes, protects Personal Data in accordance with Vietnamese law;
- GMO-Z.com RUNSYSTEM collects Personal Data for specific, clear, and lawful purposes within the scope of the purposes stated in this Policy and in compliance with Vietnamese law;

- GMO-Z.com RUNSYSTEM consistently applies and updates technical measures in accordance with Vietnamese law to ensure the security of Personal Data, including protections against unauthorized or unlawful access and/or destruction, loss, or damage of Personal Data;
- GMO-Z.com RUNSYSTEM stores Personal Data appropriately and only as necessary for processing in compliance with Vietnamese law;
- In addition to the above principles, GMO-Z.com RUNSYSTEM commits to complying with regulations related to the protection of children's data and ensures adherence to data protection laws applicable at any given time.

4. SOURCES OF PERSONAL DATA COLLECTION

GMO-Z.com RUNSYSTEM may process Personal Data obtained directly or indirectly from the Partner, or lawfully received by GMO-Z.com RUNSYSTEM, including but not limited to the following cases:

- The Partner provides Personal Data to GMO-Z.com RUNSYSTEM in the course of proposal of proposes a contract/agreement; negotiation of contracts/agreements; execution of contracts/agreements; and resolving issues arising between the parties;
- GMO-Z.com RUNSYSTEM may collect Personal Data of Partner from public sources such as telephone directories, advertising materials/flyers, information published on electronic news sites, etc;
- GMO-Z.com RUNSYSTEM may collect the Partner's Personal Data when the Partner access any website, online transaction system of GMO-Z.com RUNSYSTEM or use any features or resources available on or through such website or online transaction system;
- GMO-Z.com RUNSYSTEM may collect the Partner's Personal Data when Partner download or use GMO-Z.com RUNSYSTEM's mobile applications;
- GMO-Z.com RUNSYSTEM may collect your Personal Data and related parties' data from your connection to GMO-Z.com RUNSYSTEM through cookies, pixel tags, plug-ins, third-party social network connection sequences, or any technology capable of tracking and acquiring Personal Data on devices or websites (e.g., Facebook, Youtube, LinkedIn, Instagram);
- GMO-Z.com RUNSYSTEM may receive the Data Subject's Personal Data from competent authorities in Vietnam;
- From GMO-Z.com RUNSYSTEM's related persons, suppliers, service providers, partners, affiliates, and third parties involved in GMO-Z.com RUNSYSTEM's business activities, including but not limited to: parties conducting surveys, digital advertising, marketing, fraud prevention, data aggregation; infrastructure and technology support providers; transaction processors; brokers; commercial partners supplying products and services; and other relevant third parties;
- From recorded audio/video files stored by GMO-Z.com RUNSYSTEM's recording systems, surveillance cameras at business/transaction locations, and call center systems;
- From other sources where the Partner consents to sharing/providing Personal Data, or from sources where collection is required or permitted by law.

5. SHARING PERSONAL DATA TO THIRD PARTY

GMO-Z.com RUNSYSTEM shall only share the necessary Personal Data to fulfill each specific purpose stated above with the following parties ("**Third Party**"):

- Staff of the GMO-Z.com RUNSYSTEM who need to access to the Personal Data for the Purpose;

- The parent company, subsidiaries, joint ventures, affiliates, dependent units, or any member entities of GMO-Z.com RUNSYSTEM;
- Any individual, competent authority, regulatory agency, prosecutorial body, judicial authority, or enforcement agency to whom GMO-Z.com RUNSYSTEM is permitted or required to disclose information under the laws of any country or under any other contract or commitment between a third party and GMO-Z.com RUNSYSTEM;
- Contractors, agents, suppliers, and consultants providing support services for GMO-Z.com RUNSYSTEM's business activities, as well as business partners and related partners collaborating with GMO-Z.com RUNSYSTEM to develop, provide, or support the development and provision of GMO-Z.com RUNSYSTEM's products and services;
- Agencies, organizations, and individuals involved in processing Personal Data and/or related to the Purpose, as well as individuals, organizations, and agencies that GMO-Z.com RUNSYSTEM reasonably trusts to share and provide data for the Purpose stated in this Policy;
- Other individuals, agencies, or organizations that GMO-Z.com RUNSYSTEM deems necessary to meet and protect the legitimate rights and interests of the Data Subject and GMO-Z.com RUNSYSTEM;
- Third Party to whom the Data Subject consents or for whom GMO-Z.com RUNSYSTEM has a legal basis to share the Data Subject's Personal Data.

The Third Party will also be able to process Personal Data for the Purpose.

6. COOKIES

6.1. Cookies are small file created by a website and stored on Partner's device. Cookies usually consist of a string of numbers and letters used to identify your device. Cookies are used for various purposes, including but not limited to supporting the operation of GMO-Z.com RUNSYSTEM's products and services, remembering content you are interested in, or ensuring that advertisements you see online relate to your preferences.

6.2. Types of Cookies and their purposes:

- On the website, there are two main types of Cookies: Essential Cookies that ensure the website functions properly and maintain login status; and functional Cookies that enhance user experience by remembering preferences and personal information;
- On the platform, there are two main types of Cookies: Analytical Cookies, which are used to measure interactions and improve service performance; and advertising Cookies, which track user behavior to personalize advertisements and enhance campaign effectiveness.

6.3. Besides Cookies, GMO-Z.com RUNSYSTEM may use other tracking technologies such as web beacons (also known as clear GIFs, pixel tags, or web bugs-small code snippets that provide GMO-Z.com RUNSYSTEM a way to deliver tiny images) to improve website performance and ensure service quality;

6.4. GMO-Z.com RUNSYSTEM respects Partner's right to control Cookies. The Partner may exercise this right by accessing the "Settings" section of the browser. However, choosing to reject Cookies may affect your ability to access and use certain functions of GMO-Z.com RUNSYSTEM's website or services.

Each browser has its own features for adjusting and controlling Cookies. The Partner may learn how to change Cookie preferences through the help menu of your browser. If you choose to use "Incognito Mode" to access GMO-Z.com RUNSYSTEM's website, no Cookies will be installed on your device.

- 6.5. Your use of GMO-Z.com RUNSYSTEM's website may result in some Cookies being automatically stored. This can occur when the website you are visiting displays content from third-party websites, causing you to receive Cookies from those third parties.

GMO-Z.com RUNSYSTEM does not control Partner's storage, access, acceptance, or rejection of these Cookies. You should review the privacy policies and Cookies policies of third parties to understand how they manage Cookies and collect and use your information, and you are responsible for accepting or rejecting these Cookies.

7. TRANSFER OF PERSONAL DATA OUTSIDE THE TERRITORY OF VIETNAM

Personal Data of Vietnamese citizens may be processed outside the territory of Vietnam for the Purposes. Any sharing or processing of such Personal Data outside the territory of Vietnam by each Party must comply with the provisions of Vietnamese law on Personal Data protection.

8. STORAGE OF PERSONAL DATA

Depending on the specific activity, Personal Data may be processed by GMO-Z.com RUNSYSTEM after being provided or collected and will cease processing once the data processing for the intended purpose is complete or when the Personal Data has been deleted in accordance with regulations.

However, GMO-Z.com RUNSYSTEM may continue to retain Personal Data to fulfill its legal obligations and remains responsible for protecting such Personal Data in accordance with the law.

9. RIGHT OF THE PARTNER RELATED TO PERSONAL DATA

- 9.1. Unless otherwise provided by law, as a Data Subject, the Partner shall have the following rights: (i) Right to be informed; (ii) Right to give consent; (iii) Right to withdraw consent; (iv) Right to access; (v) Right to rectify or request rectification; (vi) Right to request provision of data; (vii) Right to request erasure of data; (viii) Right to restrict data processing; (ix) Right to object to data processing; (x) Right to lodge complaints, denunciations, or initiate lawsuits; (xi) Right to claim damages; (xii) Right to self-protection and other rights as prescribed by law.
- 9.2. To the extent permitted by law, you may exercise your rights by contacting GMO-Z.com RUNSYSTEM at the contact details provided in Article 13. GMO-Z.com RUNSYSTEM will fulfill any lawful and valid request from you within the statutory time limit from the date of receipt of your valid request.
- 9.3. However, in the event that you withdraw consent, request data deletion, and/or exercise any other rights that affect GMO-Z.com RUNSYSTEM's ability to provide and maintain products or services, depending on the nature of your request, GMO-Z.com RUNSYSTEM may consider and/or cease providing products or services due to insufficient information for processing. Such actions shall be deemed as your unilateral termination of the relationship with GMO-Z.com RUNSYSTEM and may result in a breach of contractual obligations or commitments. GMO-Z.com RUNSYSTEM shall not be liable to you for any loss or damage arising therefrom.

10. OBLIGATION OF THE PARTNER RELATED TO PERSONAL DATA

- 10.1. Unless otherwise provided by law, as a Data Subject, Partner shall have the following obligations: (i) Self-protect their own Personal Data; (ii) Respect and protect the Personal Data of others; (iii) Provide complete and accurate Personal Data in accordance with the law, the contract, or upon consenting to the processing of their Personal Data, and promptly update it in case of any changes; (iv) Comply with the laws on Personal Data protection and participate in the prevention and combat of Personal Data violations; (v) Immediately notify GMO-Z.com RUNSYSTEM upon discovering or suspecting that their Personal Data has been disclosed or any violation of Personal Data protection that the Partner may become aware of and perform other obligations as prescribed by law.

- 10.2. In the event that the Partner provides Personal Data of other individuals to GMO-Z.com RUNSYSTEM, the Partner shall ensure that the Partner has obtained the valid consent or authorization of such individuals prior to providing their Personal Data to GMO-Z.com RUNSYSTEM. The Partner shall also inform the Data Subject of the contents explained in this Policy and any updates thereto.
- 10.3. Any Personal Data provided by the Partner to GMO-Z.com RUNSYSTEM that is inaccurate and/or has not obtained the consent and/or authorization of the Data Subject, the Partner shall indemnify and hold harmless GMO-Z.com RUNSYSTEM from and against all losses, damages, costs, expenses, and liabilities (including without limitation reasonable legal fees) of any kind that GMO-Z.com RUNSYSTEM may incur.

11. SECURITY OF PERSONAL DATA

- 11.1. Each party involving in the course of the processing of Personal Data is obliged to ensure the security of Personal Data and shall be responsible for: (i) processing of Personal Data of Vietnamese citizens in accordance with Vietnamese laws and this Policy; (ii) using its endeavours to protect Personal Data; and (iii) ensuring the legitimate interests of the parties.
- 11.2. When processing Personal Data, each party shall periodically review and upgrade organizational technical and physical security solutions. At the same time, each party shall implement appropriate internal procedures and safeguards to ensure that Personal Data is neither lost, destroyed, misused, disclosed, nor is it accessed without authorization. Each party's staff is trained to process Personal Data securely with extreme care, and if they do not, they shall be subject to disciplinary action in accordance with applicable laws.

12. COMMITMENT TO PERSONAL DATA PROTECTION AND POSSIBLE UNINTENDED DAMAGES

- 12.1. GMO-Z.com RUNSYSTEM shall take all necessary measures to protect and process Personal Data in accordance with the law and this Policy. GMO-Z.com RUNSYSTEM undertakes not to rent or sell Personal Data. However, due to the inherent risks of the internet and information technology environment, incidents beyond control may still occur, such as unauthorized access, use, loss, leakage, or destruction of data, affecting the Data Subject, for example:
- Bugs and hardware defects occur where processing Personal Data;
 - Security vulnerability beyond GMO-Z.com RUNSYSTEM's control;
 - Information systems attacked by hackers;
 - Due to the intentional, unintentional fault or fraud of individuals involved in the processing of Personal Data;
 - Others that GMO-Z.com RUNSYSTEM is unable to foresee and/or cannot control.

In such cases, the Partner/Data Subject agrees that GMO-Z.com RUNSYSTEM will be exempted from liability for any unintended consequences and/or damages.

- 12.2. In the event of an incident or the discovery of an unintended personal data breach, GMO-Z.com RUNSYSTEM shall notify the relevant parties within the statutory time limit and make the best effort to remedy and prevent the breach so as to minimize any consequences to the fullest extent within its capabilities.

13. CONTACT

- 13.1. If you have any questions regarding this Policy or wish to exercise your rights under Article 9, please contact us through one of the following methods:
- Directly at the head office of GMO-Z.com RUNSYSTEM, 6th Floor, Ocean Park Building, No. 01 Dao Duy Anh, Kim Lien Ward, Hanoi City, Vietnam;
 - By post to the following mailing address: GMO-Z.com RUNSYSTEM Joint Stock Company, 6th Floor, Ocean Park Building, No. 01 Dao Duy Anh, Kim Lien Ward, Hanoi City, Vietnam;
 - By email: info@runsystem.net.
- 13.2. Please note that some requests may require you to provide additional lawful documents for identity verification or to complete prescribed forms. We always make our best efforts to support and process requests within a reasonable time frame, in compliance with applicable laws and professional standards.

14. MISCELLANEOUS

- 14.1. This Policy is established solely for the purpose of governing the processing of Personal Data in compliance with applicable laws. In the event of a dispute, the parties shall seek to resolve it through amicable negotiation in the spirit of goodwill and cooperation.
- 14.2. This Policy forms part of the general terms and conditions and constitutes an integral part of the transactions that you, our Partner, have established with GMO-Z.com RUNSYSTEM.
- 14.3. GMO-Z.com RUNSYSTEM may amend or update this Policy from time to time to comply with applicable laws and to reflect the actual operations of GMO-Z.com RUNSYSTEM. GMO-Z.com RUNSYSTEM recommends that the Partner regularly review this Policy on GMO-Z.com RUNSYSTEM's official website to stay informed of any changes and to remain updated by GMO-Z.com RUNSYSTEM on the methods of protecting the Partner's Personal Data. The Partner's continued use of GMO-Z.com RUNSYSTEM's products and services shall be deemed as the Partner's acceptance of the updated Policy.
- 14.4. In the event that GMO-Z.com RUNSYSTEM provides the Partner with Personal Data collected/held by GMO-Z.com RUNSYSTEM, the Partner agrees to maintain a level of Personal Data protection no less than the level of protection committed by GMO-Z.com RUNSYSTEM under this Policy.
- 14.5. Depending on GMO-Z.com RUNSYSTEM's role in each specific circumstance, being: (i) a Personal Data Controller; (ii) a Personal Data Processor; or (iii) Personal Data Controller-cum-Processor, GMO-Z.com RUNSYSTEM shall exercise the corresponding rights and obligations in accordance with the applicable laws.
- 14.6. All capitalized terms not otherwise defined in this document shall have the meanings as provided under the prevailing Vietnamese Personal Data Protection Laws from time to time. Matters not provided for herein shall be implemented in accordance with applicable laws, guidance of competent State authorities, and/or amendments and supplements to this Policy from time to time.
- 14.7. This Policy shall take effect from September 5, 2025.