

ROYAL CANARY CORPORATION

3C Ton Duc Thang, District 1, HCMC, Vietnam

THE GENERAL CONDITIONS OF PERSONAL DATA PROCESSING

1. GENERAL PROVISIONS

- 1.1.** “Personal Data” means any information that is expressed in the form of symbol, text, digit, image, sound or in similar forms in electronic environment that is associated with a particular natural person or helps identify a particular natural person and is provided at Section 2.1 of this General Conditions.
- 1.2.** “Personal Data Subject” means an individual identified by Personal Data, including all individual guests who are using the products, services of Royal Canary, the employees, shareholders and/or other persons that have the legal relationship with Royal Canary.
- 1.3.** This General Conditions of Personal Data Processing (hereinafter referred to as “The General Conditions”) is an inseparable part and should be read and understood consistently with the contracts, agreements, terms, conditions and other documents established between the Personal Data Subject and Royal Canary.
- 1.4.** The General Conditions may be updated, amended, supplemented or replaced by Royal Canary from time to time and posted by Royal Canary on the official website (akunarestaurant.com or boujeesaigon.com) and/or announced to the Personal Data Subject through other appropriate ways.
- 1.5.** Personal Data Processing in this General Conditions is explained in accordance with the following Royal Canary policies regarding the processing of Personal Data:
 - a) The types of Personal Data that Royal Canary will process and the manner in which Royal Canary processes Personal Data;
 - b) Purpose of processing Personal Data;
 - c) Organizations and individuals involved in processing Personal Data;
 - d) Instructions on how Personal Data Subjects can exercise their rights and obligations related to Personal Data.
- 1.6.** By registration to use or using the products, services of Royal Canary, signing the contracts and/or allowing Royal Canary to process Personal Data, Personal Data Subjects accept all provisions of this General Conditions and the amendments (if any) from time to time without any conditions.
- 1.7.** When providing Personal Data of a third party (including but not limited to information of dependents, legally related persons, spouses, children and/or parents and/or guardian, friends, beneficiaries, attorneys, partners, emergency contacts or other individual of the Personal Data Subject) to Royal Canary, Personal Data Subject represents, warrants and is responsible that the Personal Data Subject has provided fully information and obtained the legal consent/approval of that third party for Royal Canary to process the Personal Data for the purposes set out in the General Conditions. The Personal Data Subject agrees that Royal Canary is not responsible for assessing the legality or validity of this consent/approval and that storing evidence is the responsibility of the Personal Data Subject. Royal Canary is exempted from liability and required to compensate for



damages and related costs when the Personal Data Subject fails to comply with the provisions of this Section.

1.8. Royal Canary commits to obey the following principles when processing the Personal Data:

- a) Royal Canary processes and protects the Personal Data in accordance with the laws of Vietnam; obeys all provisions of the General Conditions and the contracts, agreements, other documents signed with the Personal Data Subject;
- b) Royal Canary collects the Personal Data for the specific, clear and lawful purposes, within the purposes stated in the General Conditions and in accordance with the provisions of the Vietnamese laws;
- c) Royal Canary always applies and updates the technical ways in accordance with the provisions of Vietnamese laws to ensure the data security of Personal Data, including measures to protect against theft, unauthorized or unlawful access and/or destruction, loss or damage to Personal Data;
- d) Royal Canary stores the Personal Data appropriately and to the extent necessary for the purposes of processing in accordance with the provisions of Vietnamese laws;
- e) In addition to the above principles, Royal Canary commits to complying with regulations related to children's data protection and ensuring compliance with legal regulations on data protection from time to time.

2. PERSONAL DATA

2.1. Type of Personal Data

To process the Personal Data for the purposes provided at Section 3.1 the General Conditions as well as the compliance with the regulations relating to Royal Canary's business, Royal Canary can process the Personal Data as follows:

- Basic personal data includes:
- a) Family name, middle name and first name as stated in the birth certificate, and other names (if any);
 - b) Date of birth; date of death or missing;
 - c) Gender;
 - d) Place of birth, place of birth registration, place of permanent residence, place of temporary residence, place of current residence, hometown, contact address;
 - e) Nationality;
 - f) Personal photos; information from the security systems, including the recording of images of Personal Data Subjects on camera systems and surveillance cameras at Royal Canary's business/transaction locations;
 - g) Phone number, people's identity card number, personal identification number, passport number, vehicle license number, vehicle's number, personal tax codes, social insurance number, health insurance card number;
 - h) Jobs, working place;
 - i) Marital status;
 - j) Information on family relationships (parents, children);

- k) Information on personal digital accounts; personal data that reflects activities or history of activities in cyberspace;;
- l) Other information associated with a specific person or helping identify a specific person;
- m) Information collected automatically when the Personal Data Subjects used website, mobile app and the other communications of Royal Canary such as IP address, cookie(s), device codes... and the other information accessed sources;
- n) Data was created from the results of operation bank card or bank card account, data about how the Personal Data Subject manages and uses bank card; the behavior, actions, or preferences of Personal Data Subjects expressed on digital platforms;
- Sensitive personal data
 - o) Political and religious views;
 - p) Information relating to racial origin and ethnic origin;
 - q) Information on health condition and private life that is documented in medical records, excluding information on blood type;
 - r) Information on inherited or acquired genetic characteristics of such individual;
 - s) Information on distinctive physical attributes and biological characteristics of such individual;
 - t) Data about crimes and criminal acts that are obtained and kept by law enforcement agencies;
 - u) Customer information held by credit institutions, foreign bank branches, intermediary payment service providers and other authorized organizations, including: customer identification information as stipulated by law, information on accounts, information on deposits, information on deposited properties, information on transactions, information on organizations or individuals being the securing parties at credit institutions, bank branches and intermediary payment service providers;
 - v) Personal location data that are identified through positioning services;
 - w) Other information related to the operation, provision and evaluation of Royal Canary's activities, products and services in accordance with the provisions of law.

2.2. Personal Data Sources

- a) Royal Canary or the party processing the data of Royal Canary or the third party allowed to process data for Royal Canary can collect data from the Personal Data Subjects when he/she requires or during the process Royal Canary provides any products or services to the Personal Data Subjects, and from many other sources, includes but is not limited to:
 - (i) Through the relationship between the Personal Data Subject and Royal Canary, including but not limited to the information that the Personal Data Subject provides in the registration forms and/or the transaction supporting documents, when the Personal Data Subject uses the products, services of Royal Canary, or when participating in the surveys, the examinations and promotions for the Personal Data Subject;

- (ii) Through oral and written communications of the Personal Data Subject with Royal Canary and/or individuals/organizations authorized by Royal Canary;
 - (iii) From service providers, partners, consultants of Royal Canary, including but not limited to: surveyors, social media, marketing, fraud prevention, aggregation data; technology facilities and infrastructure support parties, and other third parties related to Royal Canary's business operations;
 - (iv) From the third parties related to the Personal Data Subject, including but not limited to: the employers, account co-holders, credit grantors, security providers, co-partners, co-managers and co-shareholders;
 - (v) From government agencies, or information obtained from any publicly available source, guideline, or registry;
 - (vi) From other competent authorities in Vietnam or abroad;
 - (vii) Through the clips from camera systems and surveillance cameras at Royal Canary's business/transaction locations;
 - (viii) Through files created by the website that the Personal Data Subject visited cookie(s) or similar monitoring devices/tools;
 - (ix) From data sources of the third party that the Personal Data Subject agreed to collect data, or the sources collect data in accordance with legal regulations.
- b) Personal Data may be collected at Royal Canary's network of business units, by individuals within the Royal Canary network and communications systems, including but not limited to websites, telephones, telephone calls, landline and mobile phone conversations, emails, text messages, chat rooms or other measures of communication by Personal Data Subjects. For clarity, Personal Data may be collected through Personal Data provided by the Personal Data Subject, through Royal Canary's requests to the Personal Data Subject (or their representative) of the Personal Data Subject) or collected by Royal Canary itself or from other information sources (including information that is publicly available), created or aggregated with other information that Royal Canary has.

3. PERSONAL DATA PROCESSING

3.1. Purposes of Personal Data Processing

The Personal Data may be processed by Royal Canary or Personal Data Processor of Royal Canary or the third party allowed to process the personal data to Royal Canary for one or more purposes as follows:

3.1.1 Evaluate and provide Royal Canary products and services to Personal Data Subjects

- a) Identify, verify and maintain accurate information regarding the identity of the Personal Data Subject; search, verify and conduct anti-money laundering and other checks on Personal Data Subjects as required;
- b) Evaluate, determine, appraise and approve the provision of products and services according to registration documents and requests of Personal Data Subjects and/or related persons of Personal Data Subjects ;

- c) Appraise and evaluate the level of reliability in using products and services of Personal Data Subjects;
 - d) Consider providing or continuing to provide any products, services of Royal Canary to Personal Data Subjects.
- 3.1.2 *Carry out obligations in contracts, agreements, terms, conditions and other documents between Royal Canary and Personal Data Subjects and take care of customers*
- a) Carry out obligations according to the contracts, agreements and provide products, services to Personal Data Subjects;
 - b) Customer care, resolving complaints and lawsuits from Personal Data Subjects;
 - c) Contact Personal Data Subjects, directly or indirectly market products and services to Personal Data Subjects, implement promotional programs, exchange gifts, give prizes, deliver gifts.
- 3.1.3 *Understand the needs using products, services of Personal Data Subjects and improve the quality of provision products, services of Royal Canary*
- a) Better understand the Personal Data Subject's current and future needs and financial situation;
 - b) Improve, enhance, personalize Royal Canary's products and services and develop new products and services;
 - c) Conduct market research, surveys and data analysis related to any Royal Canary products and services provided to Personal Data Subjects;
 - d) Carry out other activities related to Royal Canary's provision, operation and management of products and services and/or to develop, enhance the provision Royal Canary's products and services to Personal Data Subjects in general; and other purposes that Royal Canary considers appropriate from time to time.
- 3.1.4 *Operation the business and management internal risks of Royal Canary*
- a) To ensure Royal Canary's legitimate business purposes in cases that Royal Canary deems necessary, including but not limited to exchanging information with Royal Canary, partners, and service providers;
 - b) To input data or to check the completeness and accuracy of the data that the Personal Data Subject provides to Royal Canary and/or the information Royal Canary inputted into the system;
 - c) To comply with agreements and contracts between Royal Canary and other third parties;
 - d) To fulfill reporting, financial, accounting and tax obligations;
 - e) To carry out activities for audit, risk management and compliance purposes;
 - f) To serve the internal requirements of Royal Canary or its member;
- 3.1.5 *Comply with the provisions of law and international treaties to which Vietnam is a member*
- a) To carry out the obligations according to the laws, international treaties that Royal Canary must comply and requirements of the competent authorities;

- b) To provide the information to the competent authorities according to the laws;
- c) To create data, reports and statistics based on requests from the State Bank of Vietnam or competent authorities according to the provisions of law.

3.1.6 Prevention, combat and prevention of crime

- a) To assess risks, analyze trends, make statistics, plan, including analyzing and processing data on anti-money laundering, to create and maintain a evaluation system and data on transaction history of Personal Data Subject's;
- b) To detect, prevent and investigate crimes, attacks or violations including fraud, money laundering, terrorism, financing of weapons of mass destruction, bribery, corruption or tax evasion.

3.1.7 Ensure the legitimate rights and interests of Royal Canary and the social community

- a) To protect or enforce Royal Canary's legitimate rights and interests, including the right to collect fees, recover and settle debts owed by Personal Data Subjects to Royal Canary;
- b) To fulfill responsibilities to the community and society.

3.1.8 Facilitate mergers, acquisitions, capital contributions, and divestments of Royal Canary

To carry out transactions such as transfer, disposition, merger or purchase, sale or exchange of Royal Canary's operations and assets.

In case of processing Personal Data for purposes other than those mentioned above, Royal Canary will only do so in accordance with the agreement with the Personal Data Subject or upon obtaining the consent of the Personal Data Subject.

3.2. Provide Personal Data: To carry out the purposes and process Personal Data according to this General Conditions, Royal Canary can provide Personal Data to the following parties:

3.2.1 Members of Royal Canary

Any members of Royal Canary; subsidiaries, joint ventures, and affiliated companies are determined by Royal Canary from time to time.

3.2.2 Third parties assist in verifying Personal Data Subject information

The agency/organization/individual related to the Personal Data Subject that Royal Canary needs to verify the Personal Data Subject information.

3.2.3 Competent authorities

- a) The competent authorities require to provide the information in accordance with the laws;
- b) Any court, arbitrator, litigation or enforcement agency has authority/requests the enforcement of responsibilities from Royal Canary;
- c) Any person, competent authority or management agency or third party to whom Royal Canary is authorized or required to disclose under the regulations of any country or under any contract or undertaking between any third party and Royal Canary.

3.2.4 *Service providers and the cooperating parties providing services with Royal Canary*

- a) Any contractors, agents, service providers, consultants or parties cooperating with Royal Canary (including employees, directors, leaders); organizations that are sellers, suppliers, partners, agents including but not limited to companies providing support services for Royal Canary's business activities such as: organizations providing administrative services, correspondence, telemarketing, direct sales, call centers, business processes, travel, visas, knowledge management, human resources management, data processing, information technology, computers, billing, debt collection and other background checks, market research, data modeling, redemption, record keeping and management, data entry, screening prior and verification, legal, website or social media, telecommunications, messaging or email, networking, telephony, infrastructure and technology support, workforce management, risk reporting, information security, software and licensing maintenance, data centers, conversations and conferences, consulting services, payment intermediary services, switching and/or other services related to, or in support of, the operation of Royal Canary's business;
- b) Business partners and related partners who cooperate with Royal Canary to develop, provide or are involved in the development and supply of Royal Canary's products and services.

3.2.5 *The third party is authorized by the Personal Data Subject*

- a) Provide to any person acting on behalf of a Personal Data Subject (payee, beneficiary, account nominee, intermediary banks, confirming bank, correspondent banks...);
- b) Any person notified, authorized, or permitted by the Personal Data Subject is authorized to provide transaction information on behalf of the Personal Data Subject.

3.2.6 *Financial institutions, intermediaries, card organizations, switching organizations*

Any credit institutions, foreign bank branches and agents, financial institutions, merchants, intermediaries, international card associations/organizations, other card switching organizations related to any any products and services provided by Royal Canary to Personal Data Subjects.

3.2.7 *The other third party*

- a) Other relevant parties that Royal Canary deems necessary to meet and protect the legitimate rights and interests of the Personal Data Subject;
- b) Advisors to the Personal Data Subject or Royal Canary including accountants, auditors, lawyers, financial consultants;
- c) Parties in the transaction of buying or selling Royal Canary's debt and assets;
- d) Any individual who intends to pay any outstanding sums relating to a Personal Data Subject to Royal Canary;
- e) Other processing of Personal Data is carried out with the consent of the Personal Data Subject;
- f) The parties processing Personal Data have received consent from the Personal Data Subject when using Royal Canary products and services.

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- 3.3. **Personal Data processing methods:** Depending on the purposes of processing Personal Data, Royal Canary or its data processors or third parties authorized to process data for Royal Canary may apply appropriate processing methods include but are not limited to automatic, manual or other methods of processing Personal Data in accordance with the provisions of law and Royal Canary from time to time.
- 3.4. **Personal Data processing time:** Depending on the specific activity, Personal Data may be processed by Royal Canary after it is provided, collected and ends when data processing is completed in accordance with the purpose of Royal Canary or until the Personal Data has been deleted in accordance with regulations.
- 3.5. **Unexpected consequences and damages may occur:** Processing Personal Data always carries the risk of data leakage or inappropriate data processing. Royal Canary recognizes the importance and responsibility of protecting Personal Data, commits to applying appropriate protection measures in accordance with current laws and regularly reviews and updates technical measures. The most optimal techniques to ensure safety in processing Personal Data, make maximum efforts to prevent risks and limit unwanted consequences and damages that may occur, protect legitimate rights and interests of the Personal Data Subject and of Royal Canary.

4. **TRANSFER OF PERSONAL DATA ABROAD**

In order to carry out the purposes of processing Personal Data in this General Conditions and other contracts, agreements and documents entered into with Personal Data Subjects, Royal Canary may be required to provide/transfer Personal Data for Royal Canary's related third parties and these third parties may be based in Vietnam or outside Vietnam. When providing/transferring Personal Data abroad (including but not limited to activities using cyberspace, devices, electronic means or other forms to transfer Personal Data abroad territory of Vietnam), Royal Canary will require the receiving third party to ensure the safety and security of the Personal Data provided/transferred. Royal Canary is committed to fully complying with regulations and compliance requirements of Vietnamese law to protect the safety of Personal Data.

5. In addition to Royal Canary, companies, member organizations of Royal Canary, subsidiaries, joint venture companies, affiliated companies of Royal Canary, and strategic investors/shareholders of Royal Canary can contact with Personal Data Subjects about products and services that Royal Canary believes may be of interest to Personal Data Subjects.

6. **NOTICE OF PROCESSING OF PERSONAL DATA**

The Personal Data Subject confirms that, by accepting this General Conditions, the Personal Data Subject has been informed by Royal Canary, is aware of and agrees to all the contents required to be notified before the Royal Canary processes Personal Data, as detailed in this General Conditions. Personal Data Subjects agree that Royal Canary is not required to provide further notification before processing Personal Data.

7. **RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS**

7.1. **Rights of Personal Data Subjects**

- a) Royal Canary respects and endeavors to protect the following rights of Personal Data Subjects:

- (i) Right to be informed;
- (ii) Right to consent;
- (iii) Right to access (including to view, edit or request to edit their personal data, unless otherwise provided by law);
- (iv) Right to withdraw consent;
- (v) Right to delete data;
- (vi) Right to restrict data processing;
- (vii) Right to provision of data;
- (viii) Right to object to data processing;
- (ix) Right to complain, denounce and/or initiate lawsuits;
- (x) Right to claim damages;
- (xi) Right to self-defense.

Royal Canary will process requests from Personal Data Subjects in accordance with the law and taking into account the legitimate interests of Personal Data Subjects. However, in the event that the Personal Data Subject withdraws his or her consent, requests data erasure and/or exercises other relevant rights in respect of any or all of the Personal Data as an image, affecting the ability to provide/maintain Royal Canary's products and services to Personal Data Subjects, depending on the nature of the Personal Data Subject's request, Royal Canary may consider and decide not to continue providing Royal Canary products and services to Personal Data Subjects. Actions taken by a Personal Data Subject under this provision shall be deemed to be a unilateral termination on the part of the Personal Data Subject of any relationship between the Personal Data Subject and Royal Canary, and may result in a breach of the Personal Data Subject's contractual obligations or commitments to Royal Canary, and Royal Canary reserves its legal rights and remedies in those cases. Accordingly, Royal Canary shall not be liable to Personal Data Subjects for any loss arising, and Royal Canary's legal rights shall be expressly reserved to limit, limit restrict, suspend, cancel, block such Personal Data.

- b) With reasonable efforts, Royal Canary will comply with a lawful and valid request from a Personal Data Subject within a reasonable time in accordance with the law.
- c) For security purposes, the Personal Data Subject may need to make his or her request in writing or use other methods to prove and authenticate the identity of the Personal Data Subject. Royal Canary may require Personal Data Subjects to verify their identity before processing the Personal Data Subject's request.
- d) For clarity, Royal Canary has the right to refuse to comply with requests from Personal Data Subjects in certain cases, including but not limited to: (i) Personal Data Subjects failure to properly follow the order and procedures instructed by Royal Canary; (ii) Personal Data Subject does not provide or does not provide fully documents to verify identity; or (iii) in case Royal Canary assesses there are signs of fraud or violations of Personal Data protection; or (iv) The provisions of law do not allow the fulfillment of the Personal Data Subject's request.



7.2. The obligations of Personal Data Subject

- a) To self-protect their own personal data; to request other relevant organizations and individuals to protect your personal data;
- b) To respect and protect others' personal data;
- c) To fully and accurately provide personal data upon giving consent to the personal data processing;
- d) To participate in the propaganda and dissemination of skills for personal data protection;
- e) To comply with the law on personal data protection and participate in the prevention of and fight against violations of the regulations on personal data protection;
- f) Notify Royal Canary immediately if you discover or suspect that your Personal Data has been exposed, which may lead to risks during service use, or any violation of Personal Data protection according to this General Conditions are identifiable to the Personal Data Subject;
- g) Regularly check Royal Canary's official website to update and follow any changes (if any) related to the Personal Data protection policy in this General Conditions;
- h) Other obligations as prescribed by law.

8. STORAGE OF PERSONAL DATA

Personal Data will be stored by Royal Canary and appropriate security measures will be applied. To the extent permitted by law, Royal Canary may store Personal Data in Vietnam or abroad, including cloud storage solutions. The storage of Personal Data is carried out for the period necessary to fulfill the purposes as agreed with the Personal Data Subject in this General Conditions, other contracts, agreements and documents as agreed upon with the Personal Data Subject in this General Conditions established with the Personal Data Subject, except in cases where it is or must be stored for a longer period of time as required by legal regulations from time to time.

9. CONTACT INFORMATION

In case Personal Data Subjects have any questions regarding the Personal Data protection policy in this General Conditions, please contact Royal Canary, at 3C Ton Duc Thang, Ben Nghe Ward, District 1, Ho Chi Minh City, Vietnam.

ROYAL CANARY CORPORATION
CHIEF EXECUTIVE OFFICER



Colin Michael Pine