



CUSTOMER PERSONAL DATA PROTECTION POLICY

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Approved by
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1. PURPOSE

DYM Medical Center Vietnam Company Limited is committed to protecting the lawful rights and interests of Data Subjects, including customers, potential customers, and related individuals. DYM respect personal privacy and endeavor to safeguard the confidentiality of all Personal Data collected and processed by the Company.

In providing our Products and Services, DYM processes Personal Data in compliance with applicable laws, internal standards, and the provisions set out in this Customer Personal Data Protection Policy ("Personal Data Protection Policy").

Personal Data Protection Policy applies to DYM in its capacity as the Personal Data Controller and/or Processor. It outlines the types of data DYM collect, how DYM use them, the parties with whom data may be shared, and how data is stored to ensure security, confidentiality, and transparent processing.

2. SCOPE

This Policy applies to all activities involving the collection, use, disclosure, transfer, storage, and other processing of Customers' Personal Data carried out by DYM during the provision of Products and Services or through any other lawful interactions between Customers and DYM.

3. DEFINITIONS AND ABBREVIATIONS

Within the scope of this document, the following terms and abbreviations are defined as:

| Term/Abbreviation | Description |
|-------------------|---|
| DYM/Company | DYM Medical Center Vietnam Company Limited |
| Branches | Entities under the management of DYM, including but not limited to: <ul style="list-style-type: none">- Branch of DYM Medical Center Vietnam Company Limited in Ho Chi Minh city.- Branch of DYM Medical Center Vietnam Company Limited in Hanoi. |
| Product | DYM's products are the tangible or quantifiable outputs generated from medical examination and treatment activities, including but not limited to medical conclusion reports, laboratory reports, and patient data, produced in accordance with professional procedures, quality standards, and applicable legal regulations. |
| Service | DYM's services encompass all general medicine, specialty, laboratory, and dental care activities, as well as customer/patient care and support services, provided through its personnel, procedures, infrastructure, appointment/medical record applications, network and server systems, and international insurance payment systems. |
| Customer | Refer to external individuals whose Personal Data is collected and processed by DYM in connection with the provision of its Products and Services or other relevant business and operational activities, includes but is not limited to: customers, prospective customers, individual partners, individual suppliers, job applicants, as well as individuals acting as representatives or contact persons of corporate partners, and other related individuals. |
| Minor | Individual under 16 years of age in accordance with applicable laws. |
| Personal Data | Personal Data refers to information in the form of symbols, text, numbers, images, audio, or similar formats in an electronic environment that is associated with, or capable of identifying, a specific individual. Personal Data includes Basic Personal Data and Sensitive Personal Data. |

| Term/Abbreviation | Description |
|-------------------------------|--|
| | Information that enables the identification of a specific individual refers to information generated from an individual's activities which, when combined with other stored data or information, can be used to identify that individual. |
| Personal Data Processing | One or multiple operations performed on Personal Data, such as collecting, recording, analyzing, verifying, storing, modifying, disclosing, combining, accessing, retrieving, recovering, encrypting, decrypting, copying, sharing, transmitting, providing, transferring, deleting, destroying, or any other related actions. |
| Data Subject | Refers to the individual to whom the Personal Data pertains. |
| Data Controller | The organization that determines the purposes and means of processing Personal Data. |
| Data Processor | The organization that processes Personal Data on behalf of the Data Controller under a contract or agreement between the parties. |
| Data Controller and Processor | The organization that both determines the purposes and means of processing and directly carries out the processing of Personal Data. |
| Customer Consent | Refers to the Customer's explicit and voluntary agreement for DYM to process their Personal Data, provided after the Customer has been fully informed of the purposes, scope, and methods of processing in accordance with applicable laws. |

4. GENERAL PROVISIONS

By registering for, accessing, or using DYM's Products, Services, software, or applications, or by entering into agreements or transactions with DYM, Customers are deemed to have provided their consent for DYM to collect and process their Personal Data in accordance with the purposes and scope set out in this Personal Data Protection Policy. Such consent constitutes the Customer's acknowledgment, understanding, and acceptance of all provisions and terms relating to the processing of Personal Data under this Policy.

DYM collects, uses, stores, and processes Customers' Personal Data strictly in accordance with applicable laws, including Decree No. 13/2023/NĐ-CP on Personal Data Protection and any amendments, supplements, or replacements thereto from time to time, as well as this Personal Data Protection Policy and any other contracts or agreements entered into between Customers and DYM.

5. TYPES OF PERSONAL DATA PROCESSED

The types of personal data that may be used and processed are the types of information listed below and may vary depending on the time and the Customer's relationship with DYM.

Basic Personal Data includes:

- Full name, including middle name and birth name; other names (if any);
- Date of birth;

- Place of birth and place of birth registration;
- Gender;
- Residence information (including permanent residence, temporary residence, current address, hometown, contact address, workplace address, office address, and other contact details);
- Nationality;
- Personal images; information obtained from security systems (for Customers visiting DYM facilities, such as audio or video recordings captured by CCTV systems);
- Identification document numbers;
- Email address; Phone number;
- Personal tax identification number;
- Driver's license number, vehicle registration number;
- Social insurance number, health insurance card number;
- Marital status;
- Full name, phone number, and address of the Customer's related persons;
- For Customers who are minors: information about the parent(s) or legal guardian(s) as prescribed by law, including full name, ID/CCCD/Passport number, contact phone number, and their relationship with the minor;
- Information about the Customer's digital accounts; personal data reflecting the Customer's activities and activity history on DYM's systems or applications;
- Other information provided by the Customer for exercising their rights or submitting requests, which does not fall under Sensitive Personal Data;
- Any other data or information voluntarily provided by the Customer to DYM during the use of DYM's products or services, or participation in DYM programs/events involving data collection, provided such data does not constitute Sensitive Personal Data;
- Any other Basic Personal Data associated with or capable of identifying a specific individual.

Note:

- When Customers provide Personal Data of other individuals to DYM, the Customer acknowledges that they act as the Data Controller with respect to the provision of such individuals' Personal Data to DYM. DYM processes this Personal Data based on the Customer's instructions and solely for the purposes set out in this Privacy Policy.
- Customers are responsible for ensuring that such individuals have been fully informed of the relevant processing purposes and the handling of their Personal Data in accordance with applicable laws, and that valid consent has been obtained from them prior to providing their information to DYM.

Sensitive Personal Data includes:

- Information relating to ethnic origin;
- Criminal records and information on criminal acts collected and maintained by law enforcement authorities;
- Customer identification information held by credit institutions, foreign bank branches, payment intermediary service providers, and other authorized entities as prescribed by law, including but not limited to:
- Information relating to customers' accounts at credit institutions, foreign bank branches, payment intermediary service providers, and other authorized entities;
- Information regarding customers' deposits at credit institutions, foreign bank branches, payment intermediary service providers, and other authorized entities;
- Information on customers' entrusted assets at credit institutions, foreign bank branches, payment intermediary service providers, and other authorized entities;
- Information relating to customers' transactions at credit institutions, foreign bank branches, payment intermediary service providers, and other authorized entities;
- Information regarding organizations or individuals acting as guarantors at credit institutions, foreign bank branches, or payment intermediary service providers;
- Location data of individuals obtained through positioning services;
- Other Personal Data classified as sensitive or requiring enhanced protective measures under applicable laws;
- Any other relevant Sensitive Personal Data.

6. PURPOSE OF PERSONAL DATA PROCESSING

DYM processes Customers' Personal Data for the following purposes:

- **Customer identity verification:** DYM processes Customer information to verify the accuracy and completeness of the information provided; to identify or authenticate Customer identity; and to conduct Customer due diligence and verification procedures.
- **Provision of Products and Services:** DYM collects, processes, and stores Customer information to provide its Products and Services, including but not limited to handling Customer requests and registrations, Customer support, management, maintenance, and updates relating to the Products and Services.
- **Compliance with applicable laws and regulatory requirements:** DYM complies with anti-money laundering, counter-terrorism financing, and sanction regulations under Vietnamese law and international standards. All Customers and transactions must comply with DYM's customer acceptance policies and sanction restrictions. To fulfill these obligations, DYM processes Customer Data for monitoring, risk assessment, due diligence, customer and transaction screening, and risk identification.
- **Product development and service quality enhancement:** DYM analyzes data from surveys and interactions with Customers to understand needs and usage

patterns, thereby improving, developing, and diversifying Products and Services, refining processes, and upgrading technology infrastructure.

- **Marketing, communication, and promotional activities:** DYM uses Customer information to provide updates on its products, services, events, promotions, and partner offerings. This includes marketing via postal mail, email, phone calls, text messages, mobile applications, or social media. DYM complies with consent requirements for marketing activities. Customers may modify or withdraw their marketing preferences at any time.
- **Risk management:** DYM processes Customer information to measure, detect, and prevent financial, legal, compliance, reputational, transactional, operational, or insurance-related risks, thereby protecting DYM's legitimate interests prior to providing credit or financial services.
- **Security and safety assurance:** DYM processes Customer Data to maintain security at its premises and the use of CCTV systems for monitoring purposes.
- **Protection of DYM's legal rights and interests:** DYM processes Customer information for legal purposes such as debt recovery, intellectual property protection, complaint or dispute management, restructuring, merger, or acquisition activities.
- Other legitimate purposes related to the purposes mentioned above.
- At the request of competent state authorities or as required by applicable laws from time to time.

If DYM processes Customer Personal Data for any purposes other than those specified above, DYM will inform the Customer of such processing and obtain additional consent before proceeding, in accordance with applicable laws and regulations.

7. METHODS OF PERSONAL DATA COLLECTION AND PROCESSING

7.1. Collection and Processing of Personal Data

- When Customers register for or use Products and Services provided by DYM;
- From communications and interactions with Customers (including in-person meetings, correspondence, telephone calls, online communications, electronic communications, social media, surveys, or any other lawful means);
- From audio and video recording devices associated with security systems installed at DYM's head office, branches, and business locations.
- From DYM's Personal Data Processors (including business partners), lawful publicly available data sources, competent state authorities, or other lawful sources;
- From information collection forms for prospective Customers at conferences, seminars, or events organized by DYM;
- From other lawful forms and means of collecting Personal Data in accordance with applicable laws.

After collecting Personal Data, DYM will carry out one or more appropriate processing activities, including but not limited to: collecting, recording, analyzing, verifying, storing, modifying, disclosing, combining, accessing, retrieving,

recovering, encrypting, decrypting, copying, sharing, transmitting, providing, transferring, deleting, or destroying Personal Data, as well as other related actions. Such processing is conducted to fulfill the stated Processing Purposes or to respond to the exercise of Customers' rights as Data Subjects (e.g., the right to rectify, update, provide, or restrict the processing of Personal Data), in accordance with applicable laws.

7.2. Processing of Personal Data Collected from Audio and Video Recording in Public Areas

DYM may collect and process individuals' image data and information obtained from security systems (e.g., audio and video recordings captured by CCTV installed in monitored areas, including but not limited to DYM's premises such as reception areas, service areas, corridors, entrances/exits) for the purposes of safeguarding national security, public order and safety, and protecting the lawful rights and interests of organizations and individuals, in accordance with applicable laws, without requiring the Customer's consent.

At DYM, security systems and CCTV operate 24/7 to ensure safety and security for Customers, prevent and detect unlawful activities, protect facilities, and support fire prevention and firefighting. DYM commits to processing Personal Data obtained from these systems strictly in accordance with this Privacy Policy and applicable laws.

7.3. Processing of Personal Data of Child Customers

DYM processes Personal Data of children in a manner that safeguards children's rights and serves the best interests of the child. Prior to processing, DYM applies appropriate measures to verify the child's age. The processing of a child's Personal Data is carried out only with the consent of the parent or lawful guardian as required by law; for children aged seven (7) years or older, the child's consent is also required, except in cases where the processing of Personal Data is permitted by law without the Data Subject's consent.

8. DELETION OF CUSTOMERS' PERSONAL DATA

DYM will irreversibly delete Customers' Personal Data in the following cases:

- Personal Data has been processed for purposes other than those specified;
- The processing purposes consented to by the Customer have been fulfilled;
- The retention of Personal Data is no longer necessary for DYM's operations;
- DYM is dissolved, ceases operations, is declared bankrupt, or is otherwise required to terminate its business operations in accordance with applicable laws.

9. PERSONAL DATA PROTECTION MEASURES

DYM implements necessary measures to prevent access to, use of, or processing of Customers' Personal Data for any purposes other than those specified in this Privacy Policy, except where required for security, safety, fraud detection, or the prevention and mitigation of risks to information system security, cybersecurity, and the protection of Customers' Personal Data.

DYM adopts appropriate Personal Data protection measures in accordance with applicable laws, including organizational, personnel, and technical measures, to

detect, prevent, and promptly address unauthorized access, data leakage, loss, or other violations relating to Personal Data, including but not limited to the following:

- Establishing, issuing, and implementing internal regulations and procedures on Personal Data protection in compliance with applicable laws;
- Designating responsible departments and personnel for Personal Data protection; recording, managing, and retaining system logs relating to Personal Data processing activities;
- Conducting cybersecurity assessments of systems, tools, and devices used for Personal Data processing; irreversibly deleting or securely destroying devices or media containing Personal Data when they are no longer required;
- Implementing and operating appropriate technical measures, including access control, intrusion prevention, user authentication, data encryption, data backup, and data recovery;
- Applying other protective measures as required by applicable laws.

10. POTENTIAL UNINTENDED CONSEQUENCES OR DAMAGES

Please note that, although DYM makes every reasonable effort to protect Customers' Personal Data in accordance with applicable laws, DYM cannot completely and absolutely eliminate all risks arising during the processing of Personal Data. The transmission of information via the Internet or through DYM's internal information systems may still involve certain inherent risks due to force majeure events or cybersecurity incidents, including but not limited to cyberattacks, cyberterrorism, and unauthorized cyber espionage, which may disrupt data processing activities or result in the leakage of Personal Data. In such cases, DYM will promptly implement necessary measures to prevent, remedy, and mitigate potential damages, and will cooperate with competent state authorities in accordance with the law. Customers further acknowledge and agree that, to the extent DYM has applied reasonable preventive measures, DYM shall not be liable for compensation for any damages caused by acts of third parties that adversely affect Customers' Personal Data and are beyond DYM's reasonable control.

11. START AND END TIME OF PERSONAL DATA PROCESSING

The start time of Personal Data processing is determined from the moment DYM lawfully collects Customers' Personal Data, including but not limited to the time when Customers register for Products or Services, establish a transactional relationship, enter into agreements, or engage in other lawful interactions with DYM.

The end time of Personal Data processing is determined when the processing purposes have been fulfilled, or when DYM no longer has a lawful basis to continue processing Personal Data in accordance with applicable laws and this Privacy Policy.

In certain cases, DYM may continue to retain and process Personal Data for a necessary period to comply with legal obligations, handle complaints or disputes, conduct audits, or as required by competent state authorities in accordance with applicable laws.

Upon expiration of the processing period, DYM will delete, destroy, or anonymize Personal Data in accordance with applicable laws and this Privacy Policy, unless otherwise required by law.

12. RIGHTS AND OBLIGATIONS OF CUSTOMERS

12.1. Rights of Customers

Customers, as Data Subjects, are entitled to the following rights in accordance with applicable Personal Data protection laws:

- The right to be informed about the processing of their Personal Data;
- The right to give or withhold consent to the processing of Personal Data, except where processing without consent is permitted by law;
- The right to access, review, rectify, update, or request copies of their Personal Data;
- The right to request restriction of processing, object to processing, or request deletion of Personal Data in accordance with the law;
- The right to withdraw previously given consent, unless otherwise provided by law;
- The right to lodge complaints, initiate legal actions, or claim damages in accordance with the law where their lawful rights and interests relating to Personal Data are infringed;
- Other rights of Data Subjects as provided under applicable laws.

12.2. Obligations of Customers

Customers are responsible for fulfilling the following obligations to ensure lawful, accurate, and secure processing of Personal Data:

- Providing accurate, complete, and up-to-date Personal Data to DYM, and promptly notifying DYM of any changes;
- Taking responsibility for the lawfulness of the Personal Data provided, including Personal Data of other individuals;
- Ensuring that relevant individuals have been duly informed and that valid consent has been obtained before providing their Personal Data to DYM, as required by law;
- Cooperating with DYM in fulfilling Data Subject rights and DYM's legal obligations;
- Not abusing Personal Data-related rights to engage in unlawful acts or infringe upon the lawful rights and interests of other organizations or individuals.

13. AMENDMENTS AND SUPPLEMENTS TO THE PERSONAL DATA PROTECTION POLICY

DYM reserves the right to amend, supplement, or update this Personal Data Protection Policy from time to time to reflect changes in applicable laws, internal governance requirements, or DYM's business operations.

Any amended or updated version of this Privacy Policy shall take effect from the time it is published on DYM's official website or otherwise notified through appropriate means in accordance with applicable laws.

Where any amendments or updates materially affect Customers' lawful rights and interests, DYM will notify Customers and obtain additional consent where required by applicable laws.

Customers are responsible for regularly reviewing this Policy. Continued use of DYM's Products and Services after the effective date of any amendments shall be deemed as Customers' acknowledgment and acceptance of such amendments, unless otherwise required by law.

14. HOW CUSTOMERS CAN CONTACT DYM

To exercise their rights or to contact DYM regarding this Personal Data Protection Policy, Customers may reach DYM via one of the following channels:

- In person: DYM Head Office – Rooms B101–B103, B1 Floor, Mplaza Saigon Building, 39 Le Duan Street, Sai Gon Ward, Ho Chi Minh City, Vietnam.
- Hotline: 1900 2929 37.
- Email: cs@dymmedicalcenter.com.vn or: info@dymmedicalcenter.com.vn