

DATA PRIVACY STATEMENT (POLICY)

1. GENERAL REGULATIONS

1.1 Data privacy policy (hereinafter referred to as “this Policy”) of HELUKABEL (Viet Nam) COMPANY LIMITED (hereinafter referred to as “HELUKABEL Viet Nam”) is based on the terms defined by Decree No. 13/2023/NĐ-CP dated April 17th, 2023 regulating protection of personal data.

1.2 By registering to use HELUKABEL Viet Nam's products and services, entering into contracts and/or allowing HELUKABEL Viet Nam to process Personal Data, Data Subject accepts all contents without any conditions for policies mentioned in this Policy and changes (if any) from time to time.

1.3 When providing Personal Data of a third party to HELUKABEL Viet Nam (including but not limited to information of dependents, legally related persons, spouses, children and/or parents and/or guardians, friends, beneficiaries, authorized persons, partners, emergency contacts, or other individuals of the Data Subject), Data Subject must represent and warrant and is responsible for completely providing information and obtaining the legal consent/approval of such a third party so that HELUKABEL Viet Nam processes Personal Data for the purposes stated in this Policy. Data Subject agrees that HELUKABEL Viet Nam is not responsible for assessing the legality and validity of this consent/approval, and Data Subject is also subject to store evidence. HELUKABEL Viet Nam is exempted from liability and required to compensate for damages and related costs when Data Subject fails to comply with the contents of this regulation.

1.4 Unless otherwise specifically defined by Law, the terms and abbreviations below are defined and/or understood, as follows:

a) We/Company/ HELUKABEL

We/Company is understood to be HELUKABEL (Viet Nam) Company Limited according to the Enterprise Registration Certificate No..... issued by the Department of Planning and Investment on

b) Personal data

“Personal data” refers to electronic information in the form of symbols, letters, numbers, images, sounds, or equivalences associated with an identified natural person or used to identify an identified natural person (*for instance: an identification number, a citizen identity card, location data, an online identifier, etc.*). Personal data includes basic personal data and sensitive personal data.

- Basic personal data includes: 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, citizen identity card, personal identification number, passport number, driver’s license number, license plate, taxpayer identification number, social security number, health insurance card number; Marital status; Information about the individual’s family relationship (parents, children); Digital account information; Personal data reflecting activities and activity history in cyberspace; Other information associated with an identified



natural person or used to identify an identified natural person without belonging to sensitive personal data.

- Sensitive personal data: refers to personal data in association with individual privacy which, when being infringed, will directly affect an individual's legal rights and interests, including: 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 behaviors collected and stored by law enforcement agencies; Information on customers of credit institutions, foreign bank branches, payment service providers and other licensed institutions, including: Client's identification as prescribed by law, accounts, deposits, deposited assets, transactions, organizations and individuals that are guarantors at credit institutions, bank branches, and payment service providers; Personal location identified via location services; Other specific personal data as prescribed by law that is particular and requires special protection measures.

c) Data subject

Data subject is any individual reflected by Personal Data, including all customers using HELUKABEL Viet Nam's products and services, HELUKABEL Viet Nam's employees,



shareholders, capital contributors, owners and/or other individuals who have legal relationships with HELUKABEL Viet Nam.

d) Processing

Processing means any separate operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, public, analysis, confirmation, organisation, structuring, storage, adaptation or alteration, retrieval, access, consultation, use, retrieval, encryption, decryption, copying, sharing, transmission, provision, transfer, erasure, destruction or other relevant activities.

e) Restriction of processing

Restriction of processing (of data) is a right of the data subject, whereby the data subject has the right to request the processor or any other Party/Department to limit the processing of personal data in the future.

f) Profiling

Profiling means the process of reviewing and analyzing the accuracy, completeness, and validity of data under any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

g) Pseudonymisation

Pseudonymisation means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separate and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

h) Controller

Controller means a legal organization or individual that determines the purposes and means of the processing of personal data. Controller plays a greater role in notifying and cooperating with authorities when arising a personal data infringement. Controller is ultimately responsible to the data subject and has the burden of proving that they obtain prior consents for all processing activities.

i) Processor

Processor means a legal organization or individual that processes personal data on behalf of the Controller through a contract or agreement with the Controller.

j) Controller-cum-Processor

Controller-cum-Processor means an organization or individual that jointly determines the purposes and means, and directly processes personal data.

k) Third party

Third party means a natural or legal person, public authority, and legal agency or body other than the data subject, Controller, processor , Controller-cum-Processor and persons who, under the direct authority of the Controller or processor, Controller-cum-Processor are authorised to process personal data.

I) Consent

Consent of the data subject means any specific, unambiguous and voluntary indication of the data subject's wishes by which he or she, by a word or writing or by a clear affirmative action, signifies agreement to the use and processing of personal data relating to him or her.

2. NAME AND ADDRESS OF THE CONTROLLER

Controller, as defined in this Regulation, is:

.....

3. NAME AND ADDRESS OF THE DATA PROTECTION OFFICER

The data protection officer appointed by the Controller is:

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Any data subject may contact the data protection officer at any time for questions or suggestions about data protection.

4. PURPOSES OF PROCESSING PERSONAL DATA

4.1. Purposes of processing personal data of the Customers

- Evaluating and providing products and services of HELUKABEL Viet Nam or products and services cooperated between HELUKABEL Viet Nam and partners to serve the Customers; identifying, verifying and maintaining accurate information about the Customers; and ensuring the security of HELUKABEL Viet Nam's information system and implementing other requirements as prescribed by Law;

- Assisting the Customers to update necessary information when they register and use products and services provided by HELUKABEL Viet Nam or HELUKABEL Viet Nam's partners;
- Performing signed contracts and agreements between HELUKABEL Viet Nam and the Customers and other related work;
- Submitting notices about activities exchanging information between the Customers and HELUKABEL Viet Nam;
- HELUKABEL Vietnam collects, stores and uses the Customers' personal data for the purpose of performing services such as the recording of dossiers and compliance with legal and tax obligations;
- Performing risk assessment, trend analysis, statistics and planning, including the data processing related to the statistics and prevention of violation acts;
- Organizing introductions, trade promotions, market research, public opinion surveys, brokerage, product introductions and advertising. Besides, contacting the Customers to directly and indirectly market products and services, as well as promotional Programs, gift exchanges, rewards and gift delivery;
- Synthesizing, analyzing, researching and developing new products and services, and providing suitable products and services to the Customers. Evaluating to improve the quality of HELUKABEL Viet Nam's products and services, developing new features and products, and supporting payment solutions and finance related to HELUKABEL Viet Nam's services;

- Investigating, resolving queries and requests for verification and complaints from the Customers (if any). Protecting and enforcing the legitimate rights and interests of HELUKABEL Viet Nam, including the rights to collect fees and recover and handle the Customers' debts with HELUKABEL Viet Nam;
- HELUKABEL Viet Nam performs other actions according to the provisions of Law from time to time.

4.2. Purposes of processing personal data of the Employees

- Evaluating and assigning the appropriate work;
- Identifying, verifying and maintaining accurate information about the Employees; and ensuring the security of HELUKABEL Viet Nam's information system and implementing other requirements as prescribed by Law;
- Assisting the Employees to update necessary information when they sign Labor Contracts with HELUKABEL Viet Nam, and register public services provided by HELUKABEL Viet Nam or HELUKABEL Viet Nam's partners;
- Performing signed contracts and agreements between HELUKABEL Viet Nam and the Employees and other related work;
- Submitting notices about activities exchanging information between the Employees and HELUKABEL Viet Nam;
- HELUKABEL Viet Nam collects, stores and uses the Employees' personal data for the purpose of performing services such as the recording of dossiers and compliance with legal and tax obligations;

- Performing risk assessment, trend analysis, statistics and planning, including the data processing related to the statistics and prevention of violation acts;
- Contacting with Employees to perform activities related to HELUKABEL Viet Nam's human resource management policy;
- Synthesizing, analyzing and developing appropriate capacity for the Employees. Evaluating to improve the quality of HELUKABEL Viet Nam's labor policy;
- Investigating, resolving queries and requests for verification and complaints from the Employees (if any). Protecting and enforcing the legitimate rights and interests of HELUKABEL Viet Nam, including the rights to collect fees and recover and handle the Employees' debts with HELUKABEL Viet Nam;
- HELUKABEL Viet Nam performs other actions according to the provisions of Law from time to time.

5. METHODS OF PERSONAL DATA COLLECTION VIA THE WEBSITE

5.1. Cookies

In order to provide you with comprehensive functionality on our website, make your usage more convenient, and optimize our offerings, we use so-called "Cookies" or comparable technologies. Cookies are small text files that are stored on your end device or its hard drive, associated with the browser you use, and through which certain information is transmitted to the initiating provider. Cookies cannot execute programs or transfer viruses to your end device. We employ Cookies for various purposes and with different functions.

We use fixed Cookies because they are strictly necessary for our website and its features to function correctly (essential Cookies). These Cookies are automatically set when you access our website or a specific function, unless you have prevented the setting of Cookies through corresponding settings in your browser. In contrast, non-essential Cookies (e.g. in the area of statistics) are set to improve, for example, the comfort and performance of our website or to store certain settings made by you. We also use such Cookies to determine information about the frequency of use of specific areas of our website, so that we can better tailor them to your needs in the future.

Most Cookies are only needed for the duration of your current service call or session and are subsequently deleted or lose their validity once you leave our website or your current session expires. Only occasionally are Cookies stored for a longer period, for instance, to recognize you and retrieve stored settings when you revisit our website at a later time. In such cases, the Cookies are automatically deleted after a predefined period, which can vary depending on the type of Cookies and its function, when you visit the page or domain that set the Cookies.

Third-party Cookies are set and used by other entities or websites, such as providers of web analysis tools. Further information about web analysis tools and reach measurement (analytics and performance) is provided in the subsequent sections of this privacy policy. Third-party providers may also use Cookies to display advertisements or integrate content from social media networks (marketing Cookies).

Accepting Cookies while using our website is not mandatory. If you do not wish to allow the use of Cookies, you can refuse or revoke your consent in one or all of the (Cookies)

policies in our Cookies banner or prevent the storage of Cookies on your end device through corresponding settings in your browser. Please note that this may limit the functionality and scope of our website. You can delete stored Cookies at any time in the system settings of your browser.

5.2. Collection of general data and information

The website of HELUKABEL collects a certain amount of data or information with every visit of the website by a data subject or an automated system. This general data and information is stored in the server's log files. The types of data that can be collected, including (1) browser types and versions, (2) the operating system used by the accessing system, (3) the website from where an accessing system goes to our website (called referrers), (4) the subpages that are accessed on our website by an accessing system, (5) the date and time of access to the website, (6) an Internet protocol (IP) address, (7) the internet service provider of the accessing system, and (8) other similar data and information that is used for protection against attacks on our IT systems.

HELUKABEL does not draw any conclusions about the data subject in the use of this general data and information collected when a data subject or a system automatically accesses our website. This information is instead required to (1) deliver the contents of our website correctly, (2) optimise the contents of our website and the advertising for it, (3) ensure the long-term functionality of our IT systems and the technology of our website, and (4) provide law enforcement with the necessary information in the event of a cyber attack. This anonymously collected data and information is evaluated by HELUKABEL, on one hand statistically, and on the other with the goal of improving data

protection and data security at our company and to ensure an optimum level of Protection for the personal data that are processed by us. The anonymous data of the server logfiles are saved separate from all personal data provided by the data subject.

5.3. Registration on our website

The data subject has the option of registering on the Controller's website. This registration process involves the collection of personal data. Which personal data are disclosed to the Controller can be seen on the registration page. The personal data entered by the data subject are collected and stored exclusively for the purpose of internal processing at the Controller. The Controller may disclose data to one or several processors, such as shipping services, who will in turn use the personal data exclusively for internal processes that are related to the Controller's purposes.

By registering on the controller's website, the IP address assigned by the data subject's internet service provider (ISP) as well as the date and time of the registration are stored.

These data are stored because they are required for preventing the abuse of our services, as well as for the investigation of potential crimes, if applicable. As a result, the storage of this data is required for safeguarding the controller. This data will not be disclosed to third parties except as prescribed by Law.

The registration of the data subject, with its voluntary disclosure of personal data, enables the Controller to offer contents or services to the data subject that by their nature can only be offered to registered users. Registered persons may change the personal data disclosed during their registration, or obtain its erasure from the Controller's data stores, at any time.

On request, the Controller will inform any data subject, at any time, about which personal data have been stored with regard to the data subject. Furthermore, the Controller will rectify or erase personal data upon request or notification by the data subject, unless barred from doing so by legal storage requirements. The data protection officer named in this privacy policy will be available as a contact for data subjects in this context.

5.4. Newsletter subscription

The HELUKABEL website has an option for subscribing to our company newsletter. The data displayed on the screen when performing the subscription will be transferred to our Controller.

HELUKABEL uses a newsletter to periodically send notifications about the company's offers and products to customers and business partners. Data subjects can receive our company newsletter only if they (1) have a valid e-mail address and (2) subscribe to the newsletter. For legal reasons, a confirmation message is sent to the e-mail address provided by the data subject during the initial newsletter subscription (double opt-in method). This confirmation message is used to verify whether the owner of the e-mail address, as the data subject, has authorized the subscription to the newsletter.

During the newsletter subscription, we also store the IP address assigned by the internet service provider (ISP) to the computer system used by the data subject at the time of subscription, as well as the date and time of subscription. The collection of this data is necessary for tracking a (potential) abuse of a data subject's e-mail address at a later date and therefore serves as a legal safeguard for the Controller.

The personal data collected during a newsletter subscription is used only for sending our newsletter. Furthermore, subscribers to the newsletter could be sent e-mail notifications if this is required for the operation of the newsletter service and related registration processes as might be the case in the event of changes to the newsletter offer or the technical circumstance. Personal data collected during newsletter subscription will not be disclosed to third parties except as prescribed by Law. The data subject may cancel the newsletter subscription at any time. The consent to the storage of personal data given by the data subject for the purposes of sending the newsletter may be withdrawn at any time by the data subject.. Subjects who have consented may revoke their consent via the link at each newsletter. Furthermore, users may unsubscribe from the newsletter directly on the Controller's website or notify the controller in other ways.

5.5. Newsletter tracking

HELUKABEL newsletters contain tracking pixels. A tracking pixel is a miniature graphic that is embedded in e-mails sent in html format to enable log file recording and analysis. This enables a statistical evaluation of the success or failure of online marketing campaigns. The embedded tracking pixel allows HELUKABEL to detect whether and when an e-mail was opened and which of the links in an e-mail were accessed by a data subject. Personal data collected via tracking pixels are stored and evaluated by the controller for the purpose of optimising the sending of newsletters and to better adapt the contents of future newsletters to the interests of the data subjects. Such personal data are not disclosed to third parties. Data subjects may at any time withdraw their consent, which has been given separately using a double opt-in process. The controller deletes such

personal data when consent is withdrawn. HELUKABEL automatically interprets unsubscribing from the newsletter as a withdrawal of consent.

5.6. Contact via the website

To comply with legal requirements, the website of HELUKABEL contains information to enable directly contacting our company quickly. This includes a general electronic mail contact (e-mail address). If a data subject contacts the controller via e-mail or a contact form, the personal data submitted by the data subject is stored automatically. Such personal data, which is voluntarily transferred to the controller by the data subject, is stored for purposes of processing or contacting the data subject. Such personal data will not be disclosed to third parties except as prescribed by Law. SSL encryption technology is used for transferring such data. The contact options are:

- Online form for file download
- Catalogue order
- Drum feedback

6. METHODS OF PERSONAL DATA COLLECTION THROUGH WEBSHOP FOR INDUSTRIAL CUSTOMERS

Customers have the possibility to register for HELUKABEL's webshop and create an account. The webshop can only be used by customers who have activated their registration account with HELUKABEL, it is a pure B2B store.

Registration and creation of the customer account

When registering and creating your customer account, the following mandatory information, which is marked with an "*", will be requested:



- First name and surname of the user, title
- Position of the user in the company
- E-mail address of the user
- Name and address of the company
- Tax ID of the company
- User's password
- If applicable, different billing or delivery address

The customers registering and creating their account are not possible without entering this mandatory data.

We process the mandatory data you provide to complete the registration request and to create your customer account. In this respect, we process the legally collected data on the regulations of Law to create your profile and to identify you at each login, and to compare and link your data with the data we have in our ERP system. Based on how the webshop is used, further data may be collected and subsequently linked to your existing profile data (e.g. order data if you purchase products in the webshop). During your registration, you also have the option of providing further information on a voluntary basis, e.g. the user's telephone number. This information is not required for the registration and the creation of the partner account. However, if you do not provide this information, we may not be able to fully comply with your requests when using the partner account. If you voluntarily provide the above optional information, this processing of data will make it easier to manage and maintain customer relationships and help optimize our online services.

Orders via webshop

For orders placed via the webshop, the following personal data is also processed:

- Order data
- Invoice and delivery address
- Selected payment method

In order to process payments, we may pass on your data to our commissioned payment service provider. We pass on details of your delivery address to logistics companies and shipping partners commissioned by us. To ensure that the goods are delivered according to your wishes, we transmit your e-mail address and, if necessary, the telephone number to the logistics company and / or shipping partner contracted by us, which take over the delivery. If necessary, they will contact you in advance of the delivery in order to coordinate details of the delivery with you. The respective data will be transmitted solely for these purposes and deleted after delivery.

We store the data collected for the processing of the contract for the duration of the contract and until the expiry of the statutory or possible contractual warranty and guarantee rights. After the expiration of this period, we retain the information of the contractual relationship required by regulations of Law.

7. ROUTINE ERASURE OF PERSONAL DATA

The Controller has to implement the deletion of personal data within 72 hours after receipt of the data subject's request for deleting a part or all of personal data collected by the Controller and the processor, except as prescribed by Law.



Data deletion will not be applicable upon the data subject's request in the following cases:

- a) The law does not permit data deletion;
- b) Processing of personal data by competent State authorities with the purposes of serving State authorities' activities as prescribed by Law;
- c) Disclosure of personal data in accordance with the law;
- d) Processing personal data to serve legal requirements, scientific research and statistics in accordance with the provisions of Law;
- e) In the event of an emergency state regarding national defense, security, social order and safety, major disasters or dangerous epidemics; a threat to security and defense but not to the extent of declaring an emergency state; prevention and fighting of riots, terrorism, crimes and law violations as defined by Law.
- f) Responding to an emergency situation that threatens the life, health or safety of the data subject or other individuals.

8. RIGHTS OF THE DATA SUBJECT

8.1. Right to be informed

The data subject has the right to be informed of his/her personal data processing, except as prescribed by Law.

The data subject also has the right to be informed as to whether his/her personal data is transferred to a third country or to an international organization or not. Where such data has been transferred, the data subject also has the right to be informed of the appropriate protective measures related to the transfer.

8.2. Right to give consent

The data subject has the right to consent or not to consent to the processing of his/her personal data, except in cases where the data subject's consent is not required.

The processor might process the personal data without needing the data subject's consent in the following cases:

- In an emergency case, it is necessary to immediately process relevant personal data to protect the life and health of the data subject or other individuals. Accordingly, the Controller, the processor, the Controller-cum-processor and Third Party also take responsibility for proving such a case;
- Disclosure of personal data in accordance with the provisions of Law;
- Processing of personal data by competent State authorities in the event of an emergency state regarding national defense, security, social order and safety, major disasters or dangerous epidemics; a threat to security and defense but not to the extent of declaring an emergency state; prevention and fighting of riots, terrorism, crimes and law violations as defined by Law;
- Performing contractual obligations of the data subject with relevant agencies, organizations and individuals as prescribed by Law;
- Serving State agencies' activities as prescribed by specialized Laws.

8.3. Right of access

The data subject has the right to access and review his/her personal data, except as prescribed by Law. Accordingly, the subject data is allowed to obtain from the Controller confirmation as to whether or not personal data concerning him or her is being

processed, and, where that is the case, access to the personal data and the following information, as well as a copy of such information, and is entitled to request for providing information related to the personal data his/her has provided before.

8.4. Right to rectification

The data subject has the right to:

- a) Access to review and rectify his/her personal data after it has been collected by the Controller and the Controller-cum-Processor with his/her consent, except as prescribed by Law;
- b) In case, direct rectification is not possible for technical or other reasons, the data subject requests the Controller and the Controller-cum-Processor to rectify his/her personal data;
- c) The Controller and the Controller-cum-Processor shall rectify the personal data of the data subject after obtaining the data subject's consent as soon as possible or as prescribed by specialized Laws. It is necessary to notify the data subject within 72 hours of receiving the request to rectify the personal data of the data subject if there is an impossible case.
- d) The Processor and Third Party are allowed to rectify the personal data of the data subject after obtaining the written consent of the Controller, the Controller-cum-Processor, and knowing that the consent of the data subject has been obtained.

Data subjects who wish to make use of this right of rectification may contact our data protection officer at any time.

8.5. Right to withdraw consent to processing



- The data subject has the right to withdraw his/her consent, except as prescribed by Law;
- The withdrawal of consent does not affect the lawfulness of the processing of data consented to before;
- The withdrawal of consent must be expressed in a format that can be printed and copied in writing, including in an electronic form or a verifiable format;
- Upon receiving the data subject's request for withdrawing consent, the Controller and the Controller-cum-Processor shall notify the data subject of the consequences and possible damages of such a withdrawal;
- Upon receiving a withdrawal request for consent, the Controller, the processor, the Controller-cum-Processor and the Third Party must stop and request relevant organizations and individuals to stop processing the personal data of the subject who withdrew its consent.

8.6. Right to erasure (right to be forgotten)

a) *The data subject is entitled to request the Controller and the Controller and Processor to delete his/her personal data in the following cases:*

- The data subject realizes that it is no longer necessary for the agreed collection purposes, and accepts possible damages when requesting deletion of data;
- The data subject withdraws its consent;
- The data subject objects to the processing of personal data, and the Controller and the Controller-cum-Processor have no legitimate reason to continue processing;
- The personal data is processed in a manner inconsistent with the agreed purposes, or the Processing of personal data violates the provisions of Law;
- The personal data must be deleted in accordance with the provisions of Law.

b) *The deletion of personal data will not be applied under the data subject's request in the following cases:*

- The law does not permit the deletion of data;
- Processing of personal data by competent State authorities with the purposes of serving State authorities' activities as prescribed by Law;
- In the event of an emergency state regarding national defense, security, social order and safety, major disasters or dangerous epidemics; a threat to security and defense but

not to the extent of declaring an emergency state; prevention and fighting of riots, terrorism, crimes and law violations as defined by Law;

- Responding to an emergency situation that threatens the life, health or safety of the data subject or other individuals.

c) The deletion of personal data is implemented within 72 hours after obtaining the data subject's request for deleting all of the personal data collected by the Controller and the Controller-cum-Processor, except as prescribed by Law.

d) The Controller, the processor, the Controller-cum-Processor and the Third Party shall irrevocably delete the data in the following cases:

- The data is processed for purposes other than agreed those or has been processed for purposes agreed to by the data subject;

- The storage of personal data is no longer necessary for the operations of the Controller, the processor, the Controller-cum-Processor and the Third Party;

- The Controller, the processor, the Controller-cum-Processor and the Third Party are dissolved or no longer operating or declared bankrupt or terminated their business activities as prescribed by Law.

Where HELUKABEL has made the personal data public and after is requested to delete such data that does not fall under cases of "data deletion will not be applied upon the data subject's request". We, in our role as the controller and taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the

data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

8.7. Right to restriction of processing

The data subject has the right to obtain restriction of the processing of his/her personal data, except as prescribed by Law.

The restriction of processing personal data shall be implemented within 72 hours after receiving the data subject's request with all required personal data, except as prescribed by Law.

8.8. Right to obtain personal data

The data subject has the right to request the Controller and the Controller-cum-Processor to provide him/her with his/her personal data, except as prescribed by Law.

8.9. Right to object

At any time, the data subject has the right to object to the processing of the personal data relating to them in order to prevent or restrict the disclosure or using behaviors for advertising or marketing purposes, except as prescribed by Law.

The Controller and the Controller-cum-Processor shall comply with the data subject's request within 72 hours after receiving the request, except as prescribed by Law. Where an objection has been submitted, HELUKABEL will no longer process the personal data unless we are can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

8.10. Right to file complaints, denunciations and lawsuits



The data subject has the right to file complaints, denunciations and lawsuits as prescribed by Law.

8.11. Right to claim damage

The data subject has the right to claim damage as prescribed by Law when there is a violation against legal regulations on protection of his/her personal data, unless otherwise agreed by parties or except as prescribed by Law.

8.12. Right to self-protection

The data subject has the right to self-protect according to regulations in the Civil Code and other relevant Laws, or request competent agencies and organizations to implement civil rights protection measures as prescribed by the applicable Civil Code.

9. OBLIGATIONS OF THE DATA SUBJECT

- Protecting his/her own personal data; and requesting relevant organizations and individuals to protect his/her personal data;
- Respecting and protecting others' personal data;
- Fully and accurately providing his/her personal data when permitting the processing;
- Participating in dissemination of personal data protection skills;
- Complying with regulations of Law on protection of personal data and preventing and fighting violations against regulations on protection of personal data.

10. RIGHTS AND OBLIGATIONS OF RELEVANT ORGANIZATIONS AND INDIVIDUALS

10.01. Rights and obligations of the Controller

a) The Controller has the rights to:

- Request the processor and Third Party to process personal data in accordance with the provisions of this Policy;

- Other rights as prescribed by Law and as agreed in writing between the Controller and the Data Subject from time to time.

b) The Controller has obligations to:

- Make sure that all personal data of the Data Subject transferred to the processor (in any form including but not limited to a message, email, fax, text, voice data, other electronic data, etc.) during the performance of the contract(s), agreement(s), commitment(s) and these general Terms and Conditions:

- The Data Subject agreed and allowed the Controller to use, exchange and provide to any Third Party;
- The Data Subject received the notice and agreed to the processing of personal data from the Controller before implementing the processing;
- The Data Subject agrees to the Controller updating and rectifying personal data in full authority according to the change notice provided by the Data Subject;
- Provisions to the processor with dossiers and documents proving the Data Subject's consent upon the processor's request.

- Rectify personal data after receiving the Data Subject's consent or as prescribed by Law.

In case it is not possible to implement, the Data Subject must be notified within 72 hours from the time of receiving the request or as prescribed by Law.

- Transfer personal data upon the Data Subject's request or as prescribed by law. In case the personal data of the Data Subject has been transferred, the Controller is obliged to notify of the appropriate protection measures related to such transfer.
- Promptly and immediately delete the personal data of the Data Subject stored at HELUKABEL Viet Nam upon the Data Subject's request or as prescribed by Law. In case there is a request to delete the personal data but it has been made public, the Controller is obliged to take reasonable steps to resolve the request, including technical measures to notify the processor currently processing the data that the Data Subject has requested the deletion of any links or copies or duplicates related to his/her personal data.
- Upon receiving the Data Subject's request to withdraw his/her consent in accordance with the agreement between the Data Subject and the Controller and as prescribed by Law, the Controller must immediately notify the processor of ceasing the processing of the Data Subject's personal data, as well as notify the Data Subject of the consequences and possible damages when implementing the right to withdraw consent.
- Prepare and submit a impact assessment dossier of transferring personal data of the Data Subject who is a Vietnamese citizen abroad to serve the inspection and assessment activities of the Ministry of Public Security. At the same time, notify the Ministry of Public Security (Department of Cyber Security and High-Tech Crime Prevention and Control) of information about the data transfer and contact details of the responsible organizations or individuals in writing after the data transfer is successful.
- Make sure that the control and Pprocessing of personal data are compliance with the Data Privacy Policy and the principles of personal data processing stipulated in Decree

No. 13/2023/ND-CP dated April 17th, 2023 of the Government regulating Protection of Personal Data as well as amended, supplemented and changed Documents (if any) on personal data protection, and demonstrate compliance with those principles of the data processing.

- In case of the Data Subject files complaint, denunciation, lawsuit and/or compensation for damage, the Controller shall be responsible for resolving issues at its own expense, and keep the processor not affected and exempted from all arising obligations (if any), except in cases where the complaint, denunciation, lawsuit and/or compensation for damages of the Data Subject are resulted due to the processor's fault.

- Other obligations as prescribed by Law and as agreed between the Parties from time to time.

10.02. Rights and obligations of the processor

a) The processor has the right to:

- Request the Controller to provide the necessary information for the purposes of processing the personal data of the Data Subject.

- Request the Controller to update changes related to the personal data of the Data Subject that the Controller has transferred immediately after being updated by the Data

Subject, if the update is necessary to serve the purposes of processing the personal data of the Data Subject and as prescribed by Law.

- Rights as prescribed by Law and stated in the written agreement between the Controller and the Data Subject from time to time.

b) The processor has the obligations to:

- Process personal data upon the Controller's request;

- Rectify the personal data of the Data Subject after obtaining the written consent of the Controller and clarify that the consent of the Data Subject has been obtained;

Immediately cease the processing of the Data Subject's personal data after obtaining the Collector's notice about the Data Subject withdrawing his/her consent, as well as notify the Data Subject of the consequences and possible damages when implementing the right to withdraw consent;

Prepare and submit a impact assessment dossier of transferring personal data of the Data Subject who is a Vietnamese citizen abroad to serve the inspection and assessment activities of the Ministry of Public Security. At the same time, notify the Ministry of Public Security (Department of Cyber Security and High-Tech Crime Prevention and Control) of information about the data transfer and contact details of the responsible organizations or individuals in writing after the data transfer is successful;

Comply with the Data Privacy Policy and the principles of personal data processing stipulated in Decree No. 13/2023/ND-CP dated April 17th, 2023 of the Government on

Potection of Personal Data as well as amended, supplemented and changed Documents (if any) on personal data protection;

Other obligations as prescribed by Law and as agreed between the Parties from time to time.

10.03. Rights and obligations of Third Party

a) Third Party has the rights to:

- Request the Controller and the Controller-cum-Processor to provide the necessary information for the purposes of processing the personal data of the Data Subject;
- Request the Controller and the Controller-cum-Processor to update changes related to the personal data of the Data Subject that the Controller has transferred immediately after being updated by the Data Subject, if the update is necessary to serve the purposes of processing the personal data of the Data Subject and as prescribed by Law;
- Rights as prescribed by Law and stated in the written agreement between the Controller and the Data Subject from time to time.

b) Third Party has the obligations to:

- Process personal data upon the requests of the Controller and the Controller-cum-Processor;
- Rectify the personal data of the Data Subject after obtaining the written consent of the Controller and the Controller-cum-Processor, and clarify that the consent of the Data Subject has been obtained;
- Immediately cease the processing of the Data Subject's personal data after obtaining the Collector's notice about the Data Subject withdrawing his/her consent, as well as

notify the Data Subject of the consequences and possible damages when implementing the right to withdraw consent;

- Prepare and submit a impact assessment dossier of transferring personal data of the Data Subject who is a Vietnamese citizen abroad to serve the inspection and assessment activities of the Ministry of Public Security. At the same time, notify the Ministry of Public Security (Department of Cyber Security and High-Tech Crime Prevention and Control) of information about the data transfer and contact details of the responsible organizations or individuals in writing after the data transfer is successful;

- Comply with the Data Privacy Policy and the principles of personal data processing stipulated in Decree No. 13/2023/ND-CP dated April 17th, 2023 of the Government on Protection of Personal Data as well as amended, supplemented and changed Documents (if any) on personal data protection;

- Other obligations as prescribed by Law and as agreed between the Parties from time to time.

11. DATA PROTECTION IN JOB APPLICATIONS OR JOB APPLICATION PROCEDURES

The controller collects and processes personal data of applicants for the application process. Processing may be electronic. an applicant shall transfer application documents to the controller electronically, e.g. via e-mail or a form provided on the website. If the Company enters into an employment contract with the applicant, the collected data are stored for purposes of performing the employment relationship in consideration of applicable regulations. If the Company and the applicant do not enter into an employment contract, then the application documents shall be erased automatically no



later than two months after receiving information that the parties have not signed an employment contract, unless personal data isn't deleted in accordance with legal regulations.

12. PRIVACY POLICY OF USE OF META (FORMERLY FACEBOOK)

We use advertising measures of the company Meta, formerly Facebook (Meta Platforms Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland).

Facebook plug-ins: With each call-up to one of the individual pages of this website, which is operated by us and on which a Facebook plug-in has been integrated, the Internet browser on the information technology system of the user (hereinafter also referred to as "data subject") is automatically prompted by the respective Facebook plug-in to display the respective Facebook plug-in of Meta Download. A complete overview of all Facebook plug-ins can be found at https://developers.facebook.com/docs/plugins/?locale=de_DE. During the course of this technical procedure, Meta gains knowledge of which specific sub-page of our website is visited by the data subject.

If the data subject is logged in at the same time on Facebook, Meta detects with each call-up to our website by the data subject and for the entire duration of their stay on our website, which specific sub-page of our website the data subject visits. This information is collected by the Facebook plug-in and assigned by Meta to the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated on our website, such as the "Like" button, or if the data subject submits a

comment, Meta assigns this information to the personal Facebook user account of the data subject and stores the personal data.

Meta receives information via the Facebook plug-in that the data subject has visited our website whenever the data subject is logged in to Facebook at the time of the call-up to our website; this takes place regardless of whether the data subject clicks on the Facebook plug-in or not. If such a transmission of information to Meta is not desirable for the data subject, he or she may prevent the transmission by logging off from their Facebook account before a call-up to our website is made.

Facebook Pixel: By integrating the so-called "Facebook Pixel" on our website, we can also display our advertising measures ("ads") to users of our website and the social network Facebook and to measure and evaluate their successes ("conversion tracking").

We also use the remarketing function "Custom Audiences", which also uses the Facebook Pixel and displays interest-based advertisements when you visit our website or other websites that have also integrated the Facebook Pixel. This allows us to show you advertising that is of interest to you in order to make our website more interesting for you and to market our offer.

Due to the marketing tools used, your browser establishes a direct connection to the Meta server when you visit our website – after giving your consent. We have no influence on the scope and further use of the data collected by Meta through the use of this tool and therefore present the processes known to us: By integrating the Facebook pixel, Meta receives the information that you have accessed the corresponding website of our website or have clicked on an advertisement from us. If you are registered with a Meta

service, Meta can assign the visit to your account. Even if you are not registered with the Facebook platform or have not logged in, it is possible that the provider will find out your IP address and other identification features and use them to create your profile.

The legal basis for the processing of your data is Clause 2, Article 9 and Clause 1, Article 11 of Decree No. 13/2023/ND-CP, i.e. the integration takes place only after your consent has been given. The revocation of your consent is possible at any time, without affecting the admissibility of the processing until the revocation. The easiest way to revoke your consent is via our Cookies banner. In addition, logged-in users can object directly to the provider or under the following link: www.facebook.com/settings/?tab=ads#. You can also disable the corresponding option in the system settings of your browser. You can delete stored Cookies at any time in the system settings of your browser. Your data will be stored as long as they are needed for the respective purpose, or you have not objected to the storage of your data or revoked your consent.

For more information on Meta's data processing, please visit: www.facebook.com/about/privacy.

13. PRIVACY POLICY FOR THE APPLICATION AND USE OF ZALO

We have integrated the Zalo application into our website; accordingly, when customers visit our website, the Zalo application will appear, allowing you to chat directly with us by clicking on it. If you are logged in to Zalo, your data will be directly linked to your account. After you click on the Zalo application displayed on our website, the Zalo application will lead you to a conversation between you and us, allowing the parties to exchange

information together. Our customer service department will interact directly with you to understand your needs and desires.

After the conversation ends, your data on the Zalo application and/or your data that we collect will be stored by us on the CRM system and kept absolutely confidential. Storing your data on the CRM system allows us to use it for advertising purposes, market research and/or website design according to personal needs.

The legal basis for processing your data is Clause 2, Article 9 and Clause 1, Article 11 of Decree No. 13/2023/ND-CP, meaning that this integration only takes place after you have made "consent". The revocation of your consent is possible at any time, without affecting the admissibility of the processing until the revocation. Additionally, logged-in users may object directly to the provider.

You could find detailed instructions on platform policy, service usage agreement, and public data processing agreement of the Zalo, at:

<https://developers.zalo.me/docs/social-api/tham-khao/chinh-sach-nen-tang-cua-zalo;>

[https://zalo.vn/dieukhoan/;](https://zalo.vn/dieukhoan/)

<https://zalo.me/policy/biz/publicDPA/>

14. PRIVACY POLICY FOR THE APPLICATION AND USE OF PIWIK PRO

We use PIWIK PRO, a software for the statistical evaluation of user access. Your IP address will be shortened before it is stored. PIWIK PRO uses Cookies, which are stored on your device and enable an analysis of your use of this website. Pseudonymous user profiles can be created from the processed data.



The data processing associated with PIWIK PRO is based on your consent in accordance with Clause 2, Article 9 and Clause 1, Article 11 of Decree No. 13/2023/ND-CP . If you do not want Cookies to be stored by PIWIK PRO on your device, you can refuse or revoke your consent in our Cookies banner. You can also disable the corresponding option in the system settings of your browser. You can delete stored Cookies at any time in the system settings of your browser.

We store your data as long as we need it for the respective purpose, or you have not objected to the storage of your data or revoked your consent.

The information collected about the use of our website is stored on servers ofor service providers commissioned by PIWIK PRO in.....

Further information on the PIWIK PRO service can be found on the manufacturer's website under <https://piwikpro.de/datenschutz/>.

15. PRIVACY POLICY WITH RESPECT TO THE USE OF GOOGLE ADS

We use the service Google Ads to bring attention to our products with the help of advertisements. If you are brought to our webpages via a Google advertisement, a Cookies will be saved to your device by Google Ads.

The advertising materials are delivered by Google via an "ad server." For this, websites, including ours, use ad server Cookies which measure specific success metrics such as the display of the advertisement or clicks from users. Using the Google Ads Cookies saved from our website, we can receive information regarding the success of our advertising campaigns. These Cookies are not intended for personal identification. The following are typically saved to the Cookies as analytical values: the unique Cookies ID, the number of

ad impressions per placement (Frequency), the last impression (relevant for post-view conversions) and opt-out information (markers showing users revocation of consent to targeted ads).

Google is able to recognize your internet browser through their Cookies. Provided a user visits certain webpages of an Ads customer's website, and the Cookies saved to the user's computer have not expired, Google and the Ads customer can identify whether the user clicked on the advertisement and was directed to this webpage. Every Ads customer is assigned a different Cookies. This ensures that Cookies cannot be tracked by the webpages of other Ads customers. Through the integration of Google Ads, Google is informed that the user has loaded a particular part of our internet presence or clicked on one of our advertisements. Provided that you are registered with a Google service, Google can match the site visit with your account. Even if you are not registered with Google, or are not logged in, it is possible for the host to discover and save your IP address.

Due to the marketing tools being used, a direct connection between your browser and a Google server is established. With these advertising measures, we are not gathering personal data ourselves, but rather making it possible for Google to do so. Exclusively statistical analyses are made available by Google for us which provide information on how often different-price advertisements were clicked on. We do not obtain further data pertaining to the use of advertising materials. In particular, we are not able to identify users based on this information.

Google Conversion Tracking: We use Google Ads with the additional "Google Conversion Tracking" application. This is a process by which we are able to audit the success of our advertising campaigns. For this, the advertisements are assigned a technical provision, ex: an ID number, with which we can determine based on clicks how users interact with advertisements and whether our services are made use of. Through this, we receive statistical information on the total number of users reached by our advertisements, which advertisements are especially popular, and possibly information on the impact of an advertisement.

Google Remarketing: We use Google Ads with the additional "Google Remarketing" application. With this process, we are able to create advertisements based on existing information on users and reach users during their further internet use in new ways. This occurs via Cookies that are saved upon visiting our webpages. In these Cookies, information pertaining to user behaviour when visiting different websites is recorded and anonymously evaluated by Google. According to statements from Google, an aggregation of data obtained through remarketing, potentially containing personal data saved by Google, does not occur.

The processing of users' information is done according to Clause 2, Article 9 and Clause 1, Article 11 of Decree No. 13/2023/ND-CP, that is the integration of Google Ads as well as the use of Google Conversion Tracking and Google Remarketing may only take place once the user has given their consent (i.e., via our Cookies banner). We share the status of users' consent with Google, as Google is required by the Digital Markets Act to obtain consent pertaining to personalised services. Our consent management platform informs

Google whether consent is given or not. The goal is to ensure that users' consent status is observed regarding Google Ads and the integration of functions and external services. In this way, users' consent and revocation thereof regarding Google Ads in conjunction with our online content will be dynamically adjusted independent of the user's selections. The revocation of consent is possible at any time without affecting the permission to process data up to the date of the revocation. Consent can easily be revoked via our Cookies banner. We save your data for as long as we need it for its intended purpose, or as long as the user does not object to the saving of their data or revoke their consent.

The data collected is saved onservers, also in the.....

Further information on data protection with Google Ireland Limited, Gordon House, Barrow Street Dublin 4, Ireland, can be found here:www.google.com/intl/de/policies/privacy and here:<http://services.google.com/sitestats/de.html>.

16. PRIVACY POLICY WITH RESPECT TO THE USE OF LINKEDIN

We use advertising from LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland ("LinkedIn"). LinkedIn is operated by LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA.

LinkedIn Plug-ins: With each access to our website, which is equipped with a LinkedIn component (LinkedIn plugin), this component causes the data subject's browser to download a representation of the LinkedIn component. Additional information about LinkedIn plugins is available at <https://developer.linkedin.com/plugins>. As part of this

technical process, LinkedIn learns which actual subpage of our website is visited by a data subject.

If the data subject is logged into LinkedIn at the same time, then LinkedIn detects which subpage of our website the data subject visits with each access to our website and over the entire duration of the visit or our website. This information is collected by the LinkedIn component and mapped by LinkedIn to the the data subject's LinkedIn account.

If the data subject clicks on a LinkedIn button integrated on our website, then LinkedIn traces this information to the personal LinkedIn user account of the data subject and stores this personal data.

Via the LinkedIn component, LinkedIn is notified that the data subject has visited our website whenever the data subject is logged into LinkedIn while accessing our website.

This happens independent of whether the data subject clicks on the LinkedIn component or not. If the data subject does not wish this information to be transferred to LinkedIn, then this can be prevented by logging out of their LinkedIn account before accessing our website.

Under <https://www.linkedin.com/psettings/guest-controls> , LinkedIn offers the option to unsubscribe from e-mail, text messages and directed advertising, as well as manage ad settings. In addition, LinkedIn uses partners like Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua and Lotame, who may set Cookies. Such Cookies may be rejected under <https://www.linkedin.com/legal/Cookies-policy> . LinkedIn's current privacy policy is available at <https://www.linkedin.com/legal/privacy-policy> . LinkedIn's Cookies policy is available at <https://www.linkedin.com/legal/Cookies-policy> .

LinkedIn Insight Tag: We also use the LinkedIn Insight tag (or LinkedIn pixel) from LinkedIn Ireland Unlimited Company ("LinkedIn"). By integrating this JavaScript tag, we can show you, as a user of our website, interest-based advertisements ("ads") that are relevant to you when you visit the LinkedIn social network or other websites that also use this technology, and we can obtain statistics about website visitors and demographics. In addition, we may use conversion tracking to measure your use of our LinkedIn ads and your interest in our offers, and we may retarget LinkedIn ads to you on other websites. We do this to improve the effectiveness of our LinkedIn ads and to make our site more interesting to you.

By integrating the LinkedIn Insight tag, your browser establishes a direct connection with the LinkedIn server - after you have given your consent - both when you visit the LinkedIn website and when you visit websites that have integrated the LinkedIn Insight tag. LinkedIn and we are jointly responsible for the collection of your usage data when you visit our site and its transmission to the provider, but LinkedIn is solely responsible for the processing of such data for the purposes described above once it has been transmitted. We have no control over the scope and nature of LinkedIn's use of the data, so we provide this information to the best of our knowledge: By integrating the LinkedIn Insight tag, LinkedIn receives information that you have visited the corresponding page on our site or clicked on an advertisement on our site. If you are registered for a LinkedIn service, LinkedIn may associate the visit with your account. Even if you are not registered with LinkedIn or have not logged in, it is possible that the provider will be able to

determine your IP address, timestamp and other identifiers and associate them with the actions associated with you.

The legal basis for the processing of your data is Clause 2, Article 9 and Clause 1, Article 11 of Decree No. 13/2023/ND-CP, i.e. the integration only takes place with your consent.

You can withdraw your consent at any time, the easiest way is to use our Cookies banner.

You can also opt out of the LinkedIn Insight tag and other advertising preferences in the ads preferences at www.linkedin.com/help/linkedin/answer/62931?trk=microsites-frontend_legal_privacy-policy&lang=en and additionally at

www.linkedin.com/psettings/guest-controls/retargeting-opt-out. For additional choices

and information, please visit the LinkedIn Privacy Centre at

<https://privacy.linkedin.com/de-de?lr=1/>. We will keep your information for as long as

we need it for the purpose for which it was collected. and you have not objected to the storage of your data or withdrawn your consent.

Privacy Information: www.linkedin.com/legal/privacy-policy?trk=homepage-basic_footer-privacy-policy/.

17. PRIVACY POLICY WITH RESPECT TO THE USE OF WIREDMINDS

Our website uses counting pixel technology provided by WiredMinds GmbH

(www.wiredminds.de) to analyze visitor behavior. In connection with this, the IP address

of the visitor is processed. The processing occurs only for the purpose of collecting

company based information such as company name, for example. IP addresses of natural

persons are excluded from any further processing by means of a whitelist. An IP address

is not stored in LeadLab under any circumstances.



At no time is it possible to draw conclusions from the collected data on an identifiable person. WiredMinds GmbH uses this information to create anonymized usage profiles of the visit behavior on our website. Data obtained during this process is not used to personally identify visitors of our website.

[Exclude from tracking](#) (To ensure WiredMinds LeadLab permanently excludes you from tracking, a functionally necessary Cookies will be set)

18. PRIVACY POLICY FOR INTEGRATION OF YOUTUBE VIDEOS

We have embedded YouTube videos on our website, which are hosted by YouTube but can be played directly from our website. These videos are all embedded in "extended privacy mode," which means that according to YouTube, the playback of a video is not used for personalized advertising to the user. However, we have no influence over this.

To enhance the protection of your data when visiting our website, the videos are initially deactivated and embedded using a "2-click" solution on the page. This integration ensures that when you visit a page on our website that contains such videos, no connection is made to Google's servers. Only when you activate the videos does your browser establish a direct connection to Google's servers.

By activating the videos, YouTube receives information that you have accessed the corresponding subpage of our website. In addition, basic data such as IP address and timestamp are transmitted. This happens regardless of whether YouTube provides a user account through which you are logged in or whether there is no user account. If you are logged in to Google, your data will be directly associated with your account. YouTube stores your data as usage profiles and uses them for advertising, market research, and/or

the personalized design of its website. Such evaluation is carried out, in particular (even for users who are not logged in), for the provision of personalized advertising and to inform other users of the social network about your activities on our website.

The legal basis for the display of videos is Clause 2, Article 9 and Clause 1, Article 11 of Decree No. 13/2023/ND-CP, i.e., embedding is only done with your consent. If you do not want Cookies to be stored on your device and your data to be processed by YouTube, you can refuse or revoke your consent.

If you do not wish for the collected data to be associated with your profile on YouTube, you must log out before activating the videos. You also have the right to object to the creation of user profiles by YouTube, and to exercise this right, you must contact YouTube or Google, for example, at <https://about.google/contact-google/>. Detailed instructions on managing your own data in connection with Google products can be found at <https://support.google.com/accounts/answer/3024190>.

We store your data for as long as we need it for the respective purpose, unless you have objected to the storage of your data or have revoked your consent.

For further information on the purpose and scope of data collection and its processing by YouTube, please refer to Google's privacy policy. You will also find further information on your rights and options for protecting your privacy at www.google.com/policies/privacy.

19. INTEGRATION OF GOOGLE MAPS

On this website, we use the services of Google Maps. This allows us to display interactive maps directly on the website and enables you to use the map function conveniently.



By displaying the interactive map, Google receives information that you have accessed the corresponding subpage of our website. In addition, basic data such as IP address and timestamp are transmitted. This happens regardless of whether Google provides a user account through which you are logged in or whether there is no user account. If you are logged in to Google, your data will be directly associated with your account. Google stores your data as usage profiles and uses them for advertising, market research, and/or the personalized design of its website. Such evaluation is carried out, in particular (even for users who are not logged in), for the provision of personalized advertising and to inform other users of the social network about your activities on our website.

The legal basis for the display of the interactive map is Clause 2, Article 9 and Clause 1, Article 11 of Decree No. 13/2023/ND-CP, i.e., integration is only done with your consent. If you do not want your data to be transmitted to Google, you can refuse or revoke your consent. Revoking your consent is possible at any time without affecting the lawfulness of processing until the revocation.

If you do not wish for the collected data to be associated with your profile on Google, you must log out before visiting the website. You also have the right to object to the creation of user profiles, and to exercise this right, you must contact Google, for example, at <https://about.google/contact-google/>. Detailed instructions on managing your own data in connection with Google products can be found at <https://support.google.com/accounts/answer/3024190>.

Your data will be stored as long as it is necessary for the respective purpose or until you have objected to the storage of your data.

For further information on the purpose and scope of data collection and its processing by Google, please refer to Google's privacy policies. You will also find further information on your rights and options for protecting your privacy at www.google.com/policies/privacy.

20. PRIVACY POLICY FOR TAG MANAGER

This website uses the tag manager of PIWIK PRO. PIWIK PRO's Tag Manager is a solution that allows marketers to manage website tags from one interface. The tool itself does not collect any personal data, it only triggers other tags, which in turn may collect such data. The tag manager of PIWIK PRO does not access this data. If Cookies have been disabled by the user, this will remain in place for all tracking tags implemented with PIWIK PRO's Tag Manager.

In addition, technically necessary (essential) Cookies can be stored on your device by using the Tag Manager, in particular to store your consent to the Cookies used on the website. Without these techniques, we cannot understand whether consent to the setting of Cookies has already been given or not. We do not require any additional consent from you for the use of technically necessary technologies.

21. PRIVACY POLICY FOR CAD DRAWINGS/3D MODELS

On our website, we have integrated a feature provided by CADENAS GmbH, Scherneck Str. 5, 86167 Augsburg ("CADENAS"). Through this feature, we offer you the opportunity to download multi-CAD drawings, BIM data, and 3D models as part of our product overview. Furthermore, in the event of accessing our product catalogues, we utilize the

usage behaviour statistics provided by CADENAS (e.g., download count, industry, location) to optimize our offering.

When you use CADENAS' features, your personal data is processed, including registration data (such as company address, email address, etc.) and usage data (such as download count) of the portal. CADENAS and HELU KABEL jointly determine the purposes and means of processing this personal data and have entered into an agreement on joint responsibility..

The processing of your personal data is carried out solely for the purposes mentioned above and, in particular, for the performance of the contract, i.e., as a basis for invoicing and for CADENAS to provide evidence of performance to us.. If you give your consent, we also process your data based on your consent. Furthermore, we have a legitimate interest in being able to offer you the desired offerings on our website and analyse the use of the offerings to achieve continuous optimization.

The data directly collected by us will be deleted from our systems as soon as the purpose for storage ceases to apply, you request us to delete it, you revoke your consent to storage, or the purpose for data storage no longer applies. Mandatory legal provisions, especially retention periods, remain unaffected. We have no influence on the storage period of your data stored by CADENAS for its own purposes. For details, please refer directly to CADENAS.

You can generally exercise your rights (information, rectification, erasure, restriction of processing, data portability, and lodging a complaint) against both us and CADENAS, although we would like to point out that they can be most effectively exercised against

CADENAS. Only CADENAS has access to the users' data and can take appropriate measures and provide information directly. If you still require assistance, you can contact us.

For further information on the p

rocessing of your personal data by CADENAS, please refer to CADENAS' privacy policy:

www.cadenas.de/de/unternehmen/datenschutz/partcommunity/mitglieder

22. LEGITIMATE INTEREST IN PROCESSING PURSUED BY THE CONTROLLER OR A THIRD PARTY

If the personal data is processed lawfully, the legitimate interests of HELUKABEL and/or the third party shall prevail, except for such interests infringing upon the data subject's fundamental rights. In case the legitimate interests of HELUKABEL and/or the third party infringe upon the fundamental rights of the data subject, it shall be considered a dispute. Accordingly, such dispute shall be handled in accordance with the law.

23. PERIOD OF STORAGE FOR PERSONAL DATA

HELUKABEL shall store and apply appropriate measures to secure and protect personal data. HELUKABEL may store Personal Data in Vietnam or abroad as permitted by Law, including cloud storage solutions. Personal Data is stored for the period necessary to fulfill the purposes as agreed with the Data Subject in contracts, agreements and other documents established with the Data Subject, except in cases where it is permitted or required to be stored longer by legal regulations from time to time.

The legal storage period is the criterion for the duration of the storage of personal data. After the period expires, the relevant data are routinely deleted if they are no longer required for the performance or initiation of contracts.

After the storage expiration of the personal data, HELUKABEL is not responsible for issues related to the personal data provided, including but not limited to compensation for damages caused to the data subject.

24. LEGAL OR CONTRACTUAL REQUIREMENTS FOR THE PROVISION OF PERSONAL DATA; NECESSITY FOR ENTERING CONTRACTS; OBLIGATION OF THE DATA SUBJECT TO PROVIDE PERSONAL DATA; POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE DATA

We hereby inform you that a disclosure of personal data may be required by law (tax regulations) or in the context of a contract (e.g. information about a party to the contract). To enter into a contract, it may be required that a data subject provide us with personal data which in turn needs to be processed by us. For example, a data subject is required to provide us with personal data when our company enters into a contract with that data subject. Failure to provide such personal data would prevent the contract with the data subject to be entered..

In case the data subject refuses to provide, we shall inform the data subject on a per case bases whether the provision of personal data is required by law or required for the contract, whether there is an obligation to provide such personal data, and what the consequences of not providing such personal data would be.

25. GENERAL PROVISIONS



25.1. This Policy is an integral part of the contracts, agreements, commitments, and terms and conditions governing the relationship between the Data Subject and HELUKABEL Viet Nam and HELUKABEL Viet Nam's partners.

25.2. The Data Subject understands and agrees that this Policy may be amended from time to time and will be notified to the Data Subject via HELUKABEL's Transaction Channels before being applied. The changes and effective dates will be updated and announced on the Transaction Channels and other channels of HELUKABEL. The Data Subject continuously uses the service after notifying amended and supplemented contents from time to time, which means that the Data Subject has accepted such amendments and supplements.

25.3. The data subject has clearly understood and agreed that this Policy is also the Notice of Personal Data processing stipulated in Article 13 of Decree No. 13/ND-CP/2023 and amended and supplemented in each period before HELUKABEL proceeds to process Personal Data.

25.4. The Data Subject commits to strictly complying with the provisions of this Policy. For issues not yet regulated, the Parties agree to comply with the provisions of law, instructions of competent State agencies and/or amendments and supplements to this Policy notified by HELUKABEL to the Data Subject from time to time.

25.5. The data subject may see advertisements or other contents on any website, application or device that may link to websites or services of partners, advertisers, sponsors or other third parties. HELUKABEL does not control the contents or links appearing on third party websites or services and is not responsible or/and liable for the

activities used by third party websites or services linked to or from any website, application or device. These websites and services may be subject to the third party's own privacy policies and terms of use.

25.6. This Policy is concluded on the goodwill between HELUKABEL and the Data Subject. During the implementation process, if there is any dispute, the Parties will proactively handle it through negotiation and mediation. In case of unsuccessful negotiation and mediation, the dispute will be settled at the competent People's Court in accordance with the provisions of Law.

25.7. The contents not stated in this Policy are governed by the provisions of Vietnamese law on personal data protection, including but not limited to Decree No. 13/2023/ND-CP of the Government on Protection of Personal Data issued on April 17th, 2023 and related documents.

25.8. This Policy is effective from .../.../..... The Data Subject understands and agrees that the Data Subject providing his/her personal Data to HELUKABEL means the Data Subject permits the Company to use such personal Data throughout the Process of receiving and processing it, starting from when HELUKABEL receives the information until there is a request to terminate/restrict the data processing from the Data Subject.