ABeam Consulting (Vietnam) Company Limited
PRIVACY POLICY

Last updated: October 16, 2026

1. Introduction and Scope

This Privacy Policy (this "**Policy**") explains how ABeam Consulting (Vietnam) Company Limited (the "**Company**," "**we**," "**our**," or "**us**") processes Personal Data (as defined below) of different categories of identifiable persons, such as our clients, customers, suppliers, distributors, contractors, sub-contractors, vendors, service providers, end-users of our various services (including, but not limited to, their directors and contact persons), and any other persons contacting the Company during the course of our business.

We recognize the importance of Personal Data protection, and we are committed to ensuring that your Personal Data is processed in accordance with Law No. 91/2025/QH15 on Personal Data Protection and its implementing decree (Decree No. 356/2025/ND-CP) (collectively, the "**PDPL**") based on this Policy.

In this Policy, "**Personal Data**" means any information relating to a natural person, also known as the data subject ("**Data Subject**"), that enables the identification of such person, directly or indirectly.

2. Acquisition of Personal Data

The Company may obtain your Personal Data directly from you or any other source, including, but not limited to the following:

(a) Provided directly by you when we are establishing a business relationship with you, including information obtained by business card exchange and submitted by you in various documents; and/or

(b) Provided when you respond to questionnaires or surveys or when you communicate with us in person or through phone calls, emails, web sites, and/or other correspondence.

In the event that you provide any Personal Data to the Company on behalf of other persons, it is your responsibility to confirm that they have consented to the processing and transfer of their Personal Data in accordance with this Policy (if necessary), and you shall be authorized to receive any privacy notice and other related information on their behalf. In the event that you provide a minor's Personal Data, you shall obtain consent from his/her parent(s) or legal guardian(s) (or you shall give the consent to the Company as his/her parent or legal guardian), as well as his/her consent if he/she is seven years old or above.

We do not knowingly collect Personal Data from child under the age of seven without the consent of his/her parent(s) or guardian(s). If we learn that Personal Data of any Data Subject less than seven years of age has been collected, we will obtain the consent of his/her parent(s) or guardian(s), or take reasonable measures, including, but not limited to, to promptly delete such Personal Data from our records.

3. Personal Data to be Processed and Purpose of Processing

The Company may collect, use, and disclose Personal Data solely to the extent necessary to

conduct its business activities and only within the scope of the purposes indicated when it obtained Personal Data. The Personal Data that the Company processes may include the following information:

Order	Types of Personal Data to be Processed	Purpose of Processing
1. Our clients, customers, suppliers, end users/distributors, contractors, sub-contractors, vendors, and service providers (including their directors and contact persons)		
1-1	Name, age, telephone number, email address, SNS account, position, address, signature, passport number and type of VISA (if necessary) and any other information you provide us in the course of business activities.	(a) to commence business with you (b) to provide production and sales support (c) to provide after service (d) to conduct customer management (e) to perform financial controls (f) to communicate and respond to inquiries (g) to record sales information (h) to keep distributor's data (i) for sales of product, promotion of sales and marketing campaign (j) for procurement and payment (k) for tax related procedures (l) for contract and dispute management (m) for security management
2. Other persons		
2-1	Name, address, telephone number, email address, etc.	(a) to conduct ordinary business activities

4. Legal Grounds for Processing

Your Personal Data shall be processed for the aforementioned purposes on a legal basis in accordance with the PDPL. The Company will usually process Personal Data where necessary for:

(a) the performance of a contract to which the Data Subject is a party or in order to take steps at the request of the Data Subject prior to entering into a contract;

(b) compliance with a legal obligation imposed upon the Company;

(c) protection of your life and health or those of others in an emergency situation;

(d) disclosure of Personal Data in accordance with the law.

5. Management of Personal Data

We may use manual means and a variety of processing tools on different websites, applications, tools managed by us to process your Personal Data.
In order to prevent undesirable consequences and damages that may occur (i.e., any leak or loss of, and damage to Personal Data), the Company shall implement necessary and appropriate measures to ensure that the Personal Data is securely managed. In the event that security incidents such as a leakage of Personal Data occurs, the Company endeavors to minimize the damage by taking prompt actions.

6. Provision of Personal Data to Third Parties

For the purposes stated in "3. Personal Data to be Processed and Purpose of Processing", the Company may disclose your Personal Data:

(a) to companies and entities within its group, including foreign entities specified here;

(b) to third-party agents/suppliers or contractors bound by obligations of confidentiality, in connection with the processing of your Personal Data for the purposes described in this Policy (this may include, without limitation to leasing company, sub-contractors, customers, system engineer service providers, financial organizations, business advisors, law firms, marketing agencies, and other service providers); and/or

(c) to the extent required by laws, regulations, or court orders (for example, if we are under a duty to disclose your Personal Data in order to comply with a legal obligation).

The Company may transfer your Personal Data to countries outside of Vietnam, such as Japan and Singapore. Countries outside of Vietnam may not have Personal Data protection laws as comprehensive as those that exist in Vietnam, and the same level of protection as that set forth in the PDPL may not necessarily be guaranteed. In such case, the Company shall implement the necessary safety management measures pursuant to the requirements of the PDPL.

7. Data Storage and Retention Period

We start processing your Personal Data after you provide your Personal Data with us. Your Personal Data will be stored securely in the Company's data server or in a third party's data server. The Company will strictly control access to Personal Data and will review such access control from time to time.

The Company will not keep your Personal Data for longer than is required for the purpose for which it has been collected or processed, in accordance with the applicable laws, or, in any case, to allow the Company to protect its legitimate rights and interests or those of third parties. To determine the appropriate retention period for the Personal Data, we shall consider the amount, nature, and sensitivity of the Personal Data; the potential risk of harm from unauthorized use or disclosure of the Personal Data; the purposes for which we process the Personal Data and whether we can achieve those purposes through other means; and the applicable legal requirements.

8. Rights of Data Subjects

The PDPL provides you the following rights to (i) be informed of your Personal Data processing, (ii) give consent to the processing of your Personal Data, (iii) access your Personal Data, (iv) withdraw consent regarding your Personal Data, (v) delete your Personal Data, (vi) restrict processing of your Personal Data, (vii) obtain Personal Data, (viii) object the processing of your Personal Data, (ix) file complaint, denunciations, and lawsuits to the relevant data protection authority, (x) claim damage, (xi) conduct self-protection, (xii) request for correction. Any request for each of these rights in relation to the Personal Data should be submitted to the respective data controller specified in "9. Contact Details of the Data Controller." When we receive a request based on such rights, we will conduct all necessary investigations and respond in accordance with the applicable timeline prescribed under the PDPL and provide you or a nominated third party with the relevant Personal Data or otherwise respond to such request within such prescribed timeline. If you have given your consent for a specific processing purpose to the Company, you

can withdraw this consent at any time. However, the withdrawal of such consent shall not affect the processing of Personal Data for which you have already legally given consent to the Company.

You also have the right to lodge a complaint, denunciations and lawsuits as prescribed by law.

9. Contact Details of the Data Controller

To exercise your rights specified in "8. Rights of Data Subjects" or inquiries concerning this Policy, you can contact the following persons/departments for each data controller.

ABEAM CONSULTING (VIETNAM) COMPANY LIMITED

Responsible Person/Department:	HR Department
Telephone Number:	028 3911 6345
Email Address:	tnguyenngochuong@abeam.com

10. Your Obligations

You have the obligations to (i) protect your own Personal Data, (ii) respect and protect other's Personal Data, (iii) fully and accurately provide your Personal Data when you consent to the processing, (iv) participate in dissemination of Personal Data protection skills, (v) comply with regulations of law on protection of Personal Data and prevent violations against regulations on protection of Personal Data.