

PRIVACY POLICY

In the course of accessing and/or using ZAMO's products and services on ZAMO's official transaction channels, and to ensure that Personal Data ("Data") remains private and secure in accordance with Decree No. 13/2023/ND-CP and applicable laws, ZAMO Company Limited ("ZAMO") issues this Personal Data Protection Policy (hereinafter referred to as the "Policy").

This Policy serves as a Notice for the Processing and Protection of Personal Data, subject to necessary changes. The latest updated version will be posted on ZAMO's official electronic information page. By using the Services, the Customer agrees to the terms in this Policy. Customers should not use the Services if they do not agree to this Policy or any other agreement governing their use of the Services. Therefore, we recommend that Customers periodically check the Policy on our electronic information page.

ARTICLE 1. DEFINITIONS

In this Policy, the following terms are understood as follows:

1. **ZAMO:** ZAMO Company Limited, headquartered at 23.07 Block A2, Ky Nguyen Apartment Building, 15B Street, Phu My Ward, District 7, Ho Chi Minh City. Tax code: 0313950909.

ZAMO's transaction channels include electronic transaction channels, electronic information pages, websites, applications, social networks, business locations, and other transaction channels provided by ZAMO from time to time or authorized for provision to the Customer.

Koffi Learning Platform is an e-learning platform for individual users. The platform includes various products such as: "BuddyTalk English Learning Software" and "Mock Interview Skill Improvement Software". Information displayed on the Website: buddytalk.koffi.vn aims to provide information about products, services, features, promotions, and customer care programs.

- Official Koffi Website: <https://koffi.vn/>
 - BuddyTalk Product Website: <https://buddytalk.koffi.vn>
 - Official Koffi Fanpage: <https://www.facebook.com/koffivn>
 - Koffi Zalo OA: <https://zalo.me/3969161200413521288>
2. **Customer/You:** An individual and/or organization providing personal data in the activities of searching, accessing, purchasing, registering to use, or using ZAMO's products, goods, or services.
 3. **Products, Goods, Services:** Any product, good, or service provided by ZAMO and/or in collaboration with ZAMO's partners that the Customer searches, accesses, purchases, registers to use, or uses.
 4. **Personal Data:** Information in the form of symbols, letters, numbers, images, sounds, or similar forms in the electronic environment that is associated with a specific Customer or helps to identify a specific Customer. Personal Data includes Basic Personal Data and Sensitive Personal Data as defined in Clause 1, Article 2, Decree 13/2023/ND-CP.
 5. **Basic Personal Data** includes the following information (Clause 3, Article 2, Decree 13/2023/ND-CP):
 - a) Given name, middle name, and birth name, other names (if any);

- b) Email address;
 - c) Information about the individual's digital account; personal data reflecting activity, history of activity in cyberspace;
 - d) Other information associated with a specific person or helping to identify a specific person not regulated in Clause 6, Article 1 of this Policy.
6. ***Sensitive Personal Data***: Personal data associated with an individual's privacy which, if violated, will directly affect the legal rights and interests of the individual, including:
- a) Voice recording data;
 - b) Other personal data that is legally defined as specific and requires necessary security measures.
7. ***Processing of Personal Data***: One or more operations that impact Personal Data, such as: collection, recording, analysis, confirmation, storage, modification, public disclosure, combination, access, retrieval, revocation, encryption, decryption, copying, sharing, transmission, provision, transfer, deletion, destruction of Personal Data or other related actions.
8. ***Personal Data Controller***: An organization or individual that determines the purposes and means of Personal Data Processing.
9. ***Personal Data Processor***: An organization or individual that performs the Processing of Personal Data on behalf of the Personal Data Controller, through a contract or agreement with the Personal Data Controller.
10. ***Personal Data Controller and Processor***: An organization or individual that simultaneously determines the purposes, means, and directly performs the Processing of Personal Data.

ARTICLE 2. TYPES OF PERSONAL DATA PROCESSED

1. The Personal Data processed includes data that the Customer provides to us when searching, accessing, purchasing, registering to use, or using the Products, Goods, Services, and data generated during the Customer's use of our Products, Goods, Services, specifically:
 - (i) Basic Personal Data specified in Clause 5, Article 1 of this Policy; and
 - (ii) Sensitive Personal Data specified in Clause 6, Article 1 of this Policy.
2. Personal Data is processed appropriately for each corresponding type of Product, Good, or Service.

ARTICLE 3. PURPOSES OF DATA PROCESSING

The Personal Data mentioned in Article 2 above may be processed for the following purposes:

1. To provide Products, Goods, Services to the Customer and to exercise ZAMO's rights and fulfill its obligations in accordance with law, including but not limited to:
 - (i) Serving business management activities; operating, exploiting, and optimizing the quality of products and services;
 - (ii) Authenticating and executing transactions;
 - (iii) Providing, activating, or verifying the Products, Goods, Services requested by the Customer or Customer requests arising during the search, access, purchase, registration to use, or use of the Products, Goods, Services;
 - (iv) Serving the purposes of contacting and notifying the Customer;
 - (v) Fulfilling the Customer's obligations and ZAMO's obligations to relevant agencies, organizations, or individuals as stipulated by law;
 - (vi) Public disclosure of the Customer's Personal Data in accordance with law;

- (vii) Fulfilling ZAMO's obligations in activities related to inspection, audit, statistics, and reporting to state agencies or organizations;
 - (viii) Executing data security operations; ensuring the safety of ZAMO's information system such as backup, disaster recovery, monitoring, resource optimization, and protecting customer Personal Data;
 - (ix) Performing control and management activities as required by state agencies in accordance with law.
2. Conducting business services such as market research, public opinion polling, and brokerage.
 3. Organizing trade introduction and promotion.

ARTICLE 4. METHOD OF DATA PROCESSING

1. Method of Collection

Personal Data is collected directly from You in the following cases:

- (i) From ZAMO's Electronic Information Pages;
- (iii) From ZAMO's transaction channels: through cyberspace; and/or other methods as stipulated by law;
- (iv) From exchanges and communications with Customers: Through direct meetings, mail, telephone, online, switchboard systems, electronic communication, or any other means, including Customer surveys;
- (v) From recording and video devices placed at ZAMO's headquarters, business locations, or where part or all of ZAMO's business activities take place, where You meet, appear, or interact with us. The placement of these recording and video devices is aimed at contributing to the protection of social order and safety, and protecting the legal rights and interests of the Customer and ZAMO in accordance with law;
- (vi) Other means: Through public, official information sources; or through receiving necessary data sharing from partners or customers, which they collected during cooperation to provide Products, Goods, Services to You and which You have permitted to be shared.

2. Method of Storage

Personal Data is stored in ZAMO's Customer database system, in an archive compliant with ISO/IEC 27001 standards, or wherever we, our partners, or our service providers have facilities and create backup copies for a data center in another region.

3. Method of Data Transfer/Sharing

We will use necessary security measures to ensure the transfer/sharing of your Personal Data to the individuals/organizations participating in the Personal Data Processing process (specified in Article 8 of this Policy); or to competent state agencies, ensuring information security, preventing data leakage, and requiring the receiving parties of the Personal Data to implement data security measures.

Voice recording data will be shared with the third party, Microsoft Foundry, for the purpose of Speech-to-Text conversion and Pronunciation Evaluation. This data is used only to provide product

features. ZAMO commits that the Customer's Data will absolutely not be used for training Artificial Intelligence (AI), and the third party, Microsoft Foundry, also commits not to use this data for AI training purposes.

4. Method of Encryption

Collected Personal Data is encrypted according to appropriate encryption standards when necessary during the storage or transfer process to ensure that the data is protected, authenticated, integral, and cannot be altered after being transmitted.

5. Method of Data Deletion

To modify or delete your personal data, you can perform the operation directly within the software or send a request for deletion/modification to the email address: lienhe@koffi.vn, except when law stipulates otherwise and in certain cases where deletion cannot be performed, such as:

- (i) Law stipulates that data deletion is not permitted or mandates data retention;
- (ii) Personal Data is processed by a competent state agency for the purpose of serving state agency activities as stipulated by law;
- (iii) Personal Data has been publicly disclosed in accordance with law;
- (iv) Personal Data is processed to serve legal requirements, scientific research, or statistics as stipulated by law;
- (v) In case of a national defense, national security, social order and safety emergency, a major disaster, or dangerous epidemic; when there is a risk threatening security or national defense but not yet at the level of declaring a state of emergency; prevention and control of riots, terrorism, crime, and legal violations;
- (vi) Responding to an emergency situation that threatens the life, health, or safety of the Customer or another individual.

ARTICLE 5. DATA SECURITY PRINCIPLES

1. Your Personal Data is secured according to this Policy and legal regulations.
2. Ensuring the safety of Customer data is carried out frequently, continuously, promptly, and effectively.

ARTICLE 6. POTENTIAL UNWANTED CONSEQUENCES AND DAMAGES

1. We utilize various data and transmission security technologies such as: HTTPS (TLS 1.2+), (SHA256), and encryption algorithms (RSA, AES) to protect and prevent your Personal Data from being unintentionally accessed, used, or shared. However, in the event that your personal data information may be attacked beyond our control, we will strive to remedy the consequences but cannot guarantee responsibility in the following cases:
 - (i) Hardware or software errors during data processing;
 - (ii) System being attacked by hackers.

We recommend that You take necessary preventative measures to protect your personal data by:

- Securing personal devices (computer, phone, tablet, etc.)
 - Not disclosing your login password, account information, and OTP
 - Not accessing or logging into your account on unfamiliar devices.
2. In the event that the data storage server is attacked leading to unprotected Personal Data, ZAMO shall be responsible for notifying the competent authorities for timely investigation and handling, and for informing You as stipulated by law.

ARTICLE 7. PERSONAL DATA PROCESSING START AND END TIME

1. Personal Data is processed from the time the customer uses the product or interacts with us through the website, application, media page, or other contact channels. This is the appropriate legal basis for us to proceed with data processing in accordance with law.
2. To the extent permitted by law, Personal Data will be processed until the purposes of data processing have been completed.
3. We may be required to store your Personal Data even after the contract between You and ZAMO has terminated to fulfill our legal obligations under law and/or the requirements of competent state agencies.

ARTICLE 8. ORGANIZATIONS AND INDIVIDUALS INVOLVED IN PERSONAL DATA PROCESSING

1. Depending on the case, we may be the Personal Data Controller or the Personal Data Controller and Processor.
2. To the extent permitted by law, You understand that we may share Personal Data for the purposes mentioned in Article 3 with the following organizations and individuals:
 - (i) Organizations and individuals providing services and/or collaborating with ZAMO, including but not limited to: agents, consulting units, auditors, lawyers, notaries, and business partners, providers of IT solutions, software, applications, and operations, management, troubleshooting, and infrastructure development services;
 - (ii) Any individual or organization that is the Customer's representative, or authorized party, acting on the Customer's behalf.
3. We may share your information with competent state agencies when executing the Personal Data Processing purposes stated in Article 3 of this Policy, in accordance with law.

ARTICLE 9. CUSTOMER RIGHTS

1. You have the right to be informed about the Processing of your Personal Data, unless law stipulates otherwise.
2. You have the right to decide on the consent related to the Processing of your Personal Data, unless law stipulates otherwise.
3. You have the right to request the deletion of your Personal Data in accordance with the provisions of Clause 6, Article 4 of this Policy.
4. You have the right to request the restriction of the Processing of your Personal Data in accordance with law.

The restriction of data processing will be carried out by us upon your request, subject to technical conditions, unless law stipulates otherwise or as agreed upon by the parties.
5. You have the right to request us to provide your Personal Data to yourself, unless law stipulates

otherwise.

6. You have the right to request the withdrawal of consent for the processing purposes that You have allowed ZAMO to process, unless law stipulates otherwise. The withdrawal of consent for the processing of your Personal Data may affect the performance of obligations, and ZAMO shall not be liable for any resulting damages or losses in this case.
7. You have the right to complain, denounce, or initiate legal proceedings in accordance with law.
8. You have the right to request compensation for actual damages in accordance with law if ZAMO violates regulations on the protection of your Personal Data, unless the parties have agreed otherwise or law stipulates otherwise.
9. Other rights according to this Policy and legal regulations.
10. For transparency in the implementation of the Policy, all requests for modification, deletion, withdrawal of consent/restriction of Personal Data processing must be sent to our official contact channels:
 - Email: lienhe@koffi.vn.
 - Hotline: 0908094174.
 - Or send a written request directly to the address: 373 Nguyen Trong Tuyen, Ward 2, Tan Binh, Ho Chi Minh City.Upon receiving the request, ZAMO will proceed to verify the information and send a notification of the request's result to You.

ARTICLE 10. CUSTOMER OBLIGATIONS

1. Comply with legal regulations and ZAMO's regulations related to the Processing of your Personal Data.
2. Provide Personal Data completely, truthfully, and accurately. If there is any inaccurate information, we will not be responsible in the event that such information affects or limits your rights.
3. Coordinate with us, competent state agencies, and/or third parties in case of issues affecting the confidentiality of your Personal Data.
4. Self-protect your Personal Data; request other related organizations and individuals to protect your Personal Data; promptly notify us when errors or inaccuracies in Personal Data are detected, or if Personal Data is suspected of being infringed.
5. Respect and protect the Personal Data of others.
6. Be responsible for the information and data that You create and provide in cyberspace; be responsible in case of data leakage or infringement due to your own fault.