

PRIVACY POLICY

This Privacy Policy (hereinafter referred to as "Policy") is compiled by SMSGEM. (hereinafter referred to as "SMSGEM", "we" or "us") to help you understand our collection, use, disclosure, retention, and protection of personal information that you may provide us directly or indirectly. It applies to SMSGEM website located at www.SMSGEM.com, and to any SMSGEM application, service, or tool (collectively "Services") where this Policy is referenced, regardless of how you access or use them, including through mobile devices. By accessing to, or using our Services, you agree to this Privacy Policy. You acknowledge that you have read, understand, and agree to be bound by this Policy and to comply with all applicable laws and regulations.

SMSGEM reserves the right, at its sole discretion, to change, modify, add or remove portions of this Policy, at any time without notice to you. Your continued use of our Services following the posting of changes will mean that you accept and agree to the changes. If you do not agree to any terms of this Policy, please do not access to and/or use our Services.

COLLECTION OF PERSONAL INFORMATION

1. Information we collect automatically SMSGEM may receive information which is automatically collected from any device (including mobile devices) when you access to and/or use our Services. This information is collected purposely to manage, improve and protect our system. Examples of this information including:

- IP address;
- Type of browser;
- Language;
- Device information;
- Date and time of your access;
- Referred websites' addresses;
- Other information regarding to your activities within our Services.

2. Information you provide us by accessing to and/or use our Services When you access to and/or use our Services, you might provide us certain information such as:

- Name, email address, phone number, etc. to create your account on our Services, place your order, register to our services, subscribe to our newsletter or to become a SMSGEM's business partner. These types of personal information are also collected to allow us to contact you and process your order;

- Curriculum Vitae, cover letter and other supporting documents which are required for a job vacancy on our Services. The information that you submit to us is stored on our system for customer services or hiring purposes, etc.

3. Information we collect using cookies SMSGEM uses “Cookie” in order to personalize and improve your experience while you access to and/or use our Services. Cookie is a simple text that is stored on your computer or mobile device by a website’s server and only that server can retrieve or read the content of such cookie. Cookie is not used to run any programs or deliver viruses to your device. Cookie allows a website to remember information and preferences which aims to save time or maintain an access without having to submit any information again. You can accept or refuse to use Cookie. Almost every browser automatically accepts Cookie, but you can change this setting to disable one or all Cookies. However, please be aware that, if you disable any Cookies that is set for your device, you may not able to use certain features of our Services.

USE OF PERSONAL INFORMATION

SMSGEM may use your personal information for the following purposes:

1. To fulfill your transaction request If you request something from SMSGEM, we may use the information that you provide to fulfill your request for:
 - Placing your order;
 - Providing services such as consultancy, support, customer care and dealing with customer complaints regarding to SMSGEM’s products and services;
 - Providing samples, flyers, binders, etc.
2. To provide, improve and personalize our Services SMSGEM may use the information collected in order to provide, improve and personalize your experience of our Services through the following means:
 - Grant limited personal privilege to access to and/or use of our Services;
 - Offer tailored and personal relevant content which you may be interested in;
 - Make your use of our Services easier by creating navigation such as display information of products and services in your language, etc.
3. For Marketing purposes SMSGEM may use your personal information for marketing and advertising activities. You have a choice to control the use of your information for such purposes. If you do not wish to receive marketing communications from us, you can simply indicate your preferences by:



- Following instructions that may be provided in our marketing and advertising emails;
- Calling us. Some SMSGEM products can be co-branded products, which are provided by SMSGEM and other third parties. If you sign up to receive offerings of such products, please understand that your information may be collected by and disclosed to such third parties. Thus, you are encouraged to review such third parties' privacy policies to understand how they process your personal information.

4. To monitor and keep records of calls, messages and other interactions in some circumstances, you might be required to contact us by phone, email or other types of communications; or vice versa. Please understand that SMSGEM monitor and, in some cases, record conversations between you and our staff for authentication, security, proofs of transactions, quality and training purposes, etc.

DISCLOSURE OF PERSONAL INFORMATION

To fulfill the purposes above, we may disclose the information, that you provide us, to SMSGEM, the parent company to which SMSGEM belongs. We may disclose your information to third parties; including, but not limited to, any company, organization and individual who are related to the fulfillment of the specific purpose.

SMSGEM minimizes the amount of information we disclose to such third parties to what is directly relevant and necessary to accomplish the specific purpose. We will not sell or rent your information to third parties for their own independent marketing or business purposes without your consent. We may disclose your information to the following third parties:

1. Business partners SMSGEM may disclose your information to our trusted business partners, such as distributors. These entities may use your information to fulfil your request.

2. Service providers We may disclose your information to third-party service providers to help us with our business operations. These entities, which examples are listed below, are limited in their ability to use your information for purposes other than providing services for us.

- In order to ship your order, we will have to provide your information such as name, address and phone number for shipping agents;
- In some cases, SMSGEM uses suppliers located in various countries to collect, use, analyze, and otherwise process information on its behalf. It is SMSGEM's practice to require such suppliers to handle information in a manner consistent with SMSGEM's policies. Regarding to online payment process, SMSGEM can use online payment service providers, that according to our rational assessment, are reliable and safe. After you agree to proceed your payment (click "Check out" Tab), our Services will

transfer you the security environment of our payment service providers. You will finish your payment thereon following instructions of such service providers and you will also be bound by their terms of use and privacy policies. MSGEM does not receive and/or hold any personal information which is collected during your transaction with such service providers.

3. Other parties There may be instances when requested by law or based on our rational assessment, MSGEM may use, publish or disclose personal information to prevent, detect, mitigate or investigate activities which are deemed to be illegal and fraudulent to protect the rights, property and safety of MSGEM, strategic partners, customers and any other related parties. Circumstances may arise where, whether for strategic or other business reasons, MSGEM decides to sell, buy, merge or otherwise reorganize businesses in some countries. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of such information from sellers. Should such event occur, MSGEM will seek and use the most appropriate method to protect your information. In addition to the disclosures described in this Policy, we may share information about you with third parties when you consent to or request such sharing.

LINKS TO NON-MSGEM WEBSITES AND THIRD-PARTY

APPLICATIONS

For your purposes to interact with other websites on which you may have accounts (such as Facebook and other social media sites) or join communities on such sites, we may provide links or embed third-party applications that allow you to login, post content or interact with members of such communities from our websites, etc. We may also provide you with general links to non-MSGEM websites. Your use of these links and applications is subject to the third parties' privacy policies, and you should familiarize yourself with the third-party websites' privacy policies before accessing to and/or using such links or applications. MSGEM is not responsible for any privacy practices or content of any non-MSGEM websites and/or third-party applications.

PERSONAL INFORMATION SECURITY

1. Our security measures We work hard and use physical and technical measures to ensure that all your personal information will be remained confidential and protected from unauthorized accesses, risks of losses, misuse, alteration or destruction. However, MSGEM does not warrant against all unauthorized activities. We provide license to access to and/or handle personal information only for suitable entities such as you or our employees who require it to fulfil their job responsibilities. These entities are strictly requested to protect your information from unauthorized

activities listed above. While you access to and/or use our Services, you can provide us with some confidential information such as the password of your MSGEM's account. We store and protect your information securely using encryption method within our database system. You are required to protect your confidential information carefully. In any case, we recommend that you should not use the same password for other websites or send details of your transactions to anyone. We are not responsible for any damages or losses arising from the exchange of your information outside MSGEM's system.

2. **Global security system** To proceed our collection, use, disclosure, processing and storage of information, your information might be transferred, stored or otherwise processed in a destination outside of your country or territory of residence. By using, participating in any of our Services and/or provide us with any information, you consent to the collection, use, disclosure, processing and storage of your information outside of your country or territory of residence. MSGEM's Privacy Policy and practices are compiled to provide you a consistent global platform to protect your information. We will take all steps reasonably necessary to ensure that your information is treated securely worldwide in accordance with this Policy. This means that even in countries whose laws provide for less protection of your information, MSGEM will still handle your information in the manner described in this Policy.
3. **Retention of information** We will retain your information for as long as your account is active or as needed for our operations, unless a longer retention period is required or permitted by law.

ACCESS TO YOUR PERSONAL INFORMATION

MSGEM intends to keep your personal information accurate, complete, and up to date. Thus, we provide you with access to your personal information when we believe that such access is necessary. This includes your rights to access, review and change your information, complying with the applicable laws and regulations. However, MSGEM has the right to reject your requests in the following situations:

- You send requests that are unreasonably repetitive;
- You require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice);
- Your right to access to your personal information can risk the privacy of others;
- You have any other extremely impractical requests. You absolutely do not use any programs, tools or any other forms to interfere in the system or alter data structures. It is strictly forbidden to distribute, propagate or encourage any activity aimed at intervening, sabotaging or infiltrating our Services' system data. All violations will be

stripped of all rights and will be prosecuted under the law if necessary. If you experience any difficulties while making attempts to access to or update your information; request to withdraw your consent for the collection, use or disclosure of your personal information or have any other requests regarding to the handing process of your information, please email us at contact@omegathem.com.

PROTECTION FOR USERS UNDER 18

We do not collect any personal information of users who are under 18 years old. If you are under 18 years old, please do not provide us with any of your information without the consent of a parent or legal guardian. If we become aware that a user under 18 has provided us with personal information, it is understood that the information provided was consented by a parent or legal guardian. MSGEM is not liable or responsible for any damages or losses of any user under 18 arising from the access and use of our Services.

LIMITATION OF LIABILITY

If any terms in this Privacy Policy are found by a competent judicial authority to be unenforceable in any respect, the validity of the remainder of this Policy will be unaffected, provided that such unenforceability does not materially affect the parties' rights under this Policy.

APPLICABLE LAW

Any action related to this Policy will be governed by the law of Vietnam, without regard to the choice or conflicts of law provisions of any jurisdiction. You agree to submit to the jurisdiction of the courts located in Vietnam, for the resolution of all disputes arising from or related to this Policy and/or your use of our Services.