



# NOTICE

5 / 8 / 2016

Song Be Golf Resort, Vietnam (“SBGR”) is an exclusive premium golf club with social, sporting activities and loyalty reward programmes that offers a range of benefits and privileges to our members, all designed to enhance and value-add to your membership experience with us. SBGR is managed and operated by Palm Song Be Golf Company Ltd (“PSBGC”), a fully owned subsidiary of ProTrade Corporation (“ProTrade”).

This SBGR Members’ Privacy Policy (“Privacy Policy”) discloses how PSBGC, through its management of SBGR, collect, store and handle the Personal Data of Members of SBGR (“you”, “your”).

Please read the following Privacy Policy to understand how we use the Personal Data we may collect from you and the measures we undertake to protect it.

By providing your Personal Data to us, you are consenting to this Privacy Policy and to the collection, use, access, transfer, storage and processing of your personal information by us, and any such use as necessary for us to deliver the expected level of service as your club; as described in this Policy.

## 1. OUR COMMITMENT TO PROTECT YOUR PRIVACY

At Song Be Golf Resort, we are committed to protecting your personal and data privacy as our member. To ensure that you can make informed decisions and feel confident about supplying your Personal Data (as defined in this Policy) to us in connection with your SBGR membership, we provide this notice outlining our practices, and the choices you have, concerning how your Personal Data is being collected and used by us.

## 2. THE PERSONAL DATA WE COLLECT

2.1. We may request you to provide information in several areas of our website, mobile services and other channels that may be used to verify your identification at a later time including but not limited to:

2.1.1. A membership number or username and password that you will use to access to our official websites and services;

2.1.2. Your personal information such as your name, gender, date of birth, nationality, country of residence, passport or other personally identifiable numbers and information about your registered status with any of our subsidiaries, associated companies and/or business associates;

2.1.3. Your contact information such as your telephone numbers, mailing addresses, email addresses, and fax numbers;

2.1.4. Your membership in other golf courses, frequent flyer or rewards programme number(s).

2.1.5. Your credit or debit card information and billing information, including name of cardholder, card number, billing address and expiry date;

2.1.6. Your business information such as company name, business title and associated contact information;

2.1.7. Your personal preference details such as interests and hobbies, your guest's personal information, languages spoken, preferred travel destinations, spouses' contact information, drinks and meal preferences, flight and hotel preferences, and other information related to needs of a modern person of discerning taste.

2.1.8. Your responses to market surveys and contests conducted by us or on our behalf;

2.1.9. Transactional data which includes records on accrual and redemption activities you have with SBGR and any loyalty programme.

2.2. Certain Personal Data (particularly relating to your personal information and contact information) are required for specific services and if you fail to supply such Personal Data as requested from each specific service, we may be unable to provide you the services in full or restrict your participation in club activities as a member, until the required information is provided.

### 3. PURPOSES FOR COLLECTION AND USE OF PERSONAL DATA

3.1. We may use Personal Data for one or more of the following purposes:

3.1.1. To process and administer your membership application (and that of your spouse & children) to join SBGR;



- 3.1.2. To process your request for any products or services offered by us;
- 3.1.3. To fulfill requests submitted by you in person, whether online, over the phone, through our mobile services, or through other methods;
- 3.1.4. To process or confirm your requested arrangements;
- 3.1.5. To provide timely updates in the event of disruption services;
- 3.1.6. For the operations of SBGR including golf facilities and membership management, delivery of associated benefits and services, ongoing research and programme development, as well as delivering news and information to members of SBGR, and for other record-keeping purposes related to SBGR programme;
- 3.1.7. For marketing, promotional and member relationship management purposes, such as conducting market research or sending you updates on the latest offers and promotions in connection with PSBGC, SBGR, other PSBGC/SBGR related companies, e.g. ProTrade, or partners; (please see Section 10 - "Notice on Direct Marketing" for details);
- 3.1.8. For identification and verification purposes, in connection with any of the services or products that may be supplied to you;
- 3.1.9. To respond, handle and process any enquiries submitted by you;
- 3.1.10. To administer contests and sweepstakes conducted by us or on our behalf, including disclosing the winner of any such contest;
- 3.1.11. To disclose to a third party to comply with any law, legal requirements, orders, directors or requests from any court, authority or government body of any jurisdiction, which may be within or outside of the Socialist Republic of Viet Nam;
- 3.1.12. To facilitate payments for products and services provided by us or our subsidiaries, associated companies and business associates, including verification of credit card details with third parties and to conduct matching procedures against databases of known fraudulent transactions (maintained by us or third parties);
- 3.1.13. To improve our security, including in relation to the processing of payment by credit card to guard against the risk of fraud including carrying out matching procedures against databases of known fraudulent transactions (maintained by us or third parties);



3.1.14. To provide other SBGR, golf related and/or loyalty programme related services;

3.1.15. To pass on to and for the use by any of our subsidiaries, associate companies and/or business associates in connection with any of the above purposes and/or any other travel related services and offers such companies and associates may offer from time to time;

3.1.16. To fulfill the above purposes, you may be contacted via email, direct mailing, telephone marketing, SMS or other means that are allowed by local authorities.

3.2. We may also from time to time use aggregate non-identifying information about our members to better design our website and/or to improve our services and products. This means we may provide this information to third parties. However, this information will never identify any single member of the programme in particular.

3.3. Except as provided below, we will not knowingly or intentionally use or share the Personal Data you provide to use in ways unrelated to the aforementioned purposes without your prior consent.

#### 4. How to Access and Correct Your Personal Data

4.1. You may request access to and correct your Personal Data held by us. If you wish to obtain a copy of any of your Personal Data; if you believe that the Personal Data relating to you which we collect and maintain is incorrect; or if you believe that the Personal Data held by us was used beyond the scope of the purposes of use disclosed above or was acquired by fraudulent or unlawful means or provided to a third party without your prior consent, please write to us at the address below.

4.2. A request for access or correction to, or deletion of Personal Data or for information regarding policies and practices and kinds of Personal Data held by us must be in writing and sent to us via feedback form at [www.songbegolfresort.com](http://www.songbegolfresort.com) or via postal mail at the following address:

The Custodian of Personal Data Privacy & Protection.

Song Be Golf Resort

77 Binh Duong Boulevard, Lai Thieu Ward, Thuan An Town,  
Binh Duong Province, S.R. Viet Nam.

4.3. We may charge a reasonable fee for the processing of any data access request(s).



## 5. USE OF COOKIES ON SBGR ONLINE SITES

The websites of the PSBGC/SBGR companies, including songbegolfresort.com and songbegolf.com.vn or any other sites which SBGR owns & operates which will be updated to you, ("SBGR Online Sites") use cookies which amongst other things, help us to improve your membership experience at our websites and to ensure that they perform as you expect them to.

Cookies are text files containing small amounts of information, which are downloaded to your computer or mobile device by websites that you visit. They can improve your experience of using a website, for example, by remembering your preference settings and tracking your use of a website so that it can be improved to meet your needs.

5.1. We or any of our appointed vendors for purpose of managing and delivering online websites and services, may use different types of cookies on the SBGR Online Sites:

### Session Cookies

These are temporary cookies that allow us to link the actions of a user during a browser session. A browser session starts when you open the browser window and finishes when you close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

For example, we use session cookies on the SBGR Online Sites for the following purposes:

- to allow you to carry information across pages of our respective SBGR Online Sites and avoid having to re-enter information, such as logging in for every page;
- within registration to allow you to access stored information; and
- during any of the booking and reservations process so that we can remember your selections.

### Persistent Cookies

These cookies remain on your device between browsing sessions. They are activated each time you visit the website that created that particular cookie. For example, where a "persistent cookie" is used on a website to remember your log-in details, you will not need to enter those details each time you visit that website.



For example, we use persistent cookies on the SBGR Online Sites for the following purposes:

- to compile anonymous, aggregated statistics that allow us to understand how users use SBGR Online Sites, and to help us improve the structure of SBGR Online Sites. We cannot identify you personally in this way; and
- to store your chosen country or locality homepage destination.

### Third Party Cookies

We also have cookies on our websites that are set by third parties to enable you to use their software or applications provided through the SBGR Online Sites.

For example, we use third party cookies on the SBGR Online Sites for the following purposes:

- to determine and track website traffic coming in from advertisement banners that have been placed on third parties' websites;
- to track how our websites are being used; and
- to enable you to share offers and information from our websites.

## 5.2. Disabling / Enabling Cookies

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features on the SBGR Online Sites if cookies have been disabled completely.

Unless the cookie is a strictly necessary cookie, you can withdraw your consent to our cookies at any time even if you have previously consented. Although, please do remember that if you do not consent to certain functionality cookies, parts of the SBGR Online Sites may not work.

You can set your cookie preferences when you arrive at a SBGR Online Site. You can also change them or opt out at any time.

## 5.3. Log Files

We may collect information regarding your IP address, browser type, domain name and access time. This information is used for our own research purposes and is separate from any cookies data. We do not link IP addresses to any personal information. In rare instances, IP addresses may be used to assist in deterring and/or preventing abusive or criminal activity on the website.



## 6. LINKS TO OTHER WEBSITES

A SBGR Online Site may contain links to other sites that are operated by third party companies with different privacy practices. You should remain alert when you leave our site and read the privacy statements of other websites. We have no control over Personal Data that you submit to or the information you receive from these third parties.

## 7. OUR COMMITMENT TO DATA SECURITY

7.1 To maintain the accuracy of the Personal Data, as well as to prevent unauthorised access to and ensure the correct use of Personal Data, we have implemented appropriate physical, technical, and administrative measures to safeguard and secure the Personal Data that we collect.

7.2 For example, we use Secure Socket Layer (SSL) protocol—an industry standard for encryption over the Internet—to protect in transmission the Personal Data we collect online. When you type in sensitive information such as credit card details, these will be automatically converted into codes before being securely dispatched over the Internet. All electronic Personal Data that we maintain is securely stored and further protected through our use of appropriate access controls. When disposing of Personal Data, paper documents containing Personal Data are securely destroyed, and electronic files storing Personal Data are permanently deleted.

7.3 In addition, to better protect certain Personal Data, you must enter your unique personal username and password to access your SBGR membership and any loyalty rewards account on our website.

7.4 As stated above, in some instances we may entrust Personal Data to third party service providers (including service providers outside of your jurisdiction), binding them to protect the security of Personal Data and only to use it for the purposes we specify.

## 8. DISCLOSURE AND TRANSFER OF PERSONAL DATA

8.1 SBGR membership privileges and loyalty programmes are offered to you by PSBGC, an established company with golf operations, partners, affiliates and business associates located in Vietnam and worldwide. As such, the Personal Data you submit to us in one country may be transferred, used, processed, stored and accessed worldwide in one or more additional countries, as described in this Privacy Policy.





8.2 In addition, we may disclose and transfer Personal Data to and jointly use Personal Data with (whether within or outside of your jurisdiction) our subsidiaries, associated companies, business associates, service providers, and other persons who we consider appropriate, in connection with the services and products provided to or requested by you. We may disclose this information to facilitate communication of news and information about such services and products and otherwise for the purposes mentioned above, under Section 3, “Purposes for which the Personal Data are Collected and Used.”

8.3. The entities with whom PSBGC may share your Personal Data include but are not limited to:

8.3.1. Any PSBGC/SBGR companies or affiliated companies, including but not limited to Protrade Corporation and her subsidiaries ;

8.3.2. Any agent, contractor or third party service provider who provides administrative, marketing and research, distribution, data processing, telemarketing, telecommunications, computer, payment or other services to Song Be Golf Resort in connection with the operation of its business and/or SBGR programme;

8.3.3. Other business associates such as SBGR partners, air carriers, land or sea transport operators, loyalty programme operators, hotel operators, credit card issuers, retailers, restaurants and other companies involved in qualifying, offering or providing member service, or fulfilling member requests in connection with a SBGR programme; and

8.3.4. Government or non-government authorities, agencies and/or regulators.

8.4. Where permitted by applicable local law, we may also disclose your Personal Data to third parties in the following one or any of the following condition:

(i) when required by law, by court order, or in response to a search warrant or other legally valid inquiry;

(ii) to an investigative body;

(iii) to enforce our agreements with you;

(iv) when requested by other government or law enforcement authorities (such as immigration and customs control and/or border control agencies);

(v) with your express consent, or,





(vi) pursuant to our good faith belief that disclosure is required by law or otherwise necessary to the establishment of legal claims or defenses, to obtain legal advice, to exercise and defend our legal rights, to protect our rights or properties and those of our subsidiaries or associated companies, or to protect the life, body or property of any individual. This also applies when we have reason to believe that disclosing the Personal Data is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

8.5. We may also transfer any information we have about you that may be considered as an “asset” in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Song Be Golf Resort or as part of a corporate reorganisation or stock sale or other change in corporate control.

8.6. Please be advised that the Personal Data that Song Be Golf Resort collects or obtains may be transferred jurisdictions that offer lesser protection of Personal Data than that provided in your domicile jurisdiction. By submitting personal information to Song Be Golf Resort or using any Song Be Golf Resort website, you understand and consent to such transfer.

8.7. Song Be Golf Resort does not sell your Personal Data.

## 9. CHANGES TO MEMBERS’ DATA PRIVACY POLICY

We will post on our website at [www.songbegolfresort.com](http://www.songbegolfresort.com) any changes to this policy with the effective date of the changed policy, so that you can be informed of the way we collect and use your Personal Data any time you so choose. If at any point we decide to use the Personal Data you submitted under this current policy in a way that differs materially from the Privacy Policy that applied at the time of that submission, you will be notified and given the opportunity via the website, email or in writing to opt out or otherwise prevent such usage.

## 10. NOTICE ON DIRECT MARKETING

10.1. Occasionally, we may use your personal data (including your name and contact details and all other information collected during or subsequent to initial registration) to send you marketing communications such as printed material, email, telephone and SMS containing news, offers, promotions and



joint marketing offers on products and services [in respect of which SBGR may or may not be remunerated]. The products and services include:

10.2. Products and services offered by PSBGC/SBGR companies, including but not limited to, ProTrade Corporation and her group of companies and subsidiaries, including travel and lifestyle awards, food and beverage, catering and ground handling and travel services;

10.3. Products and services offered by co-branding partners of SBGR. For a full list of SBGR partners, please click [here](#).

10.3.1. Air travel, leisure travel and accommodation services;

10.3.2. Financial, insurance, credit card, banking, foreign exchange, and other related services and products;

10.3.3. Reward, loyalty or privileges programme offered by SBGR or partners;

10.3.4. Telecommunication, Internet and mobile services;

10.3.5. Non-air transportation services such as hotel transfers, car rentals, limousine and taxi services, bus operators, train operators and cruise operators;

10.3.6. Food, wine and beverage services;

10.3.7. Travel and leisure services, including holiday package products and services offered by travel agents, tickets to theme parks and other attractions;

10.3.8. Other retail products and services, including but not limited to:

- consumer electronics; computers and peripherals;
- printed matter including books, newspapers subscriptions and magazine subscriptions;
- audio visual titles;
- computer software, toy and games;
- household goods;
- sporting equipment and golf equipment;
- fashion and apparel (both golf related and non-related);
- watches and jewellery;
- suitcases and bags;
- food and consumables;
- beauty products and cosmetics;
- gift, flowers and hampers;
- health and beauty services, included but not limited to



medical check-ups and spa packages;  
- vouchers, coupons and gift cards;

10.3.9. Professional and consulting services;

10.3.10. Tickets for concerts, sporting, art fairs and special invitations-only events;

10.3.11. Real estate purchase or rental;

10.4. All products and services offered in SBGR ProShop, a list of which can be found at SBGR Online Site. Information collected may be transferred to a place outside Vietnam.

10.5. You may indicate your consent to the above by the following ways:

a. When providing us with your personal data through our website or a form, ticking the box(es) indicating your consent; or

b. When providing us with your personal data through the telephone, tell our staff or representative that you consent.

10.6. You may opt-out from receiving marketing communications at any time, free of charge, by:

a. Following the “opt-out” instructions contained in the communications;

b. Writing to us at the address listed above, under Section 4 – “How to Access or Correct Your Personal Data”; or

c. Updating your email subscriptions preferences in your membership profile online.

## 11. DATA CONTROLLER

Any personal data provided to or gathered by Song Be Golf Resort is controlled primarily by Song Be Golf Resort.



## 12. RETENTION OF DATA

All Personal Data that has been collected from you will only be stored for a limited duration that is relevant to the purpose for which it was processed and for as long as required by applicable law.

This notice is written in English language and may be translated into other languages for the understanding of members of foreign nationalities in Vietnam. In the event of any inconsistency between the English version and the translated version(s) of this notice, the English version shall prevail.

Version Effective date: 9th March 2016

