

PRIVACY POLICY

Su Ma Highland Artisan

sumahighlandartisan.com

Effective Date: May 2, 2026

Table of Contents

1. Introduction
2. Information We Collect
3. How We Use Your Information
4. Cookies and Tracking Technologies
5. Analytics
6. Email Communications
7. Data Sharing and Third Parties
8. International Data Transfers
9. Data Retention
10. Data Security
11. Your Rights
12. GDPR Compliance (For EU/EEA Visitors)
13. Vietnam Data Protection Context
14. Children's Privacy
15. Third-Party Links

16. Changes to This Privacy Policy

17. Contact Us

1. Introduction

Welcome to **Su Ma Highland Artisan** (“we,” “us,” or “our”). We operate the website **sumahighlandartisan.com** (the “Website”), a Vietnam-based artisan business located in the Sa Pa Highlands, Vietnam. We are committed to respecting and protecting the privacy of every individual who visits our Website and uses our services.

This Privacy Policy (the “Policy”) describes how Su Ma Highland Artisan collects, uses, stores, shares, and protects personal information obtained through the Website and related communications. By accessing or using our Website, placing an order, or otherwise interacting with us, you acknowledge that you have read, understood, and agree to the practices described in this Policy.

Effective Date: This Policy is effective as of **May 2, 2026**.

2. Information We Collect

We collect various types of information in connection with the services we provide, including information you provide directly, information collected automatically, and information obtained from third-party sources.

2.1 Personal Information Provided Directly

When you place an order, create an account, subscribe to our newsletter, contact us, or otherwise interact with our Website, you may provide us with personal information, including but not limited to:

- Full name

- Email address
- Shipping and billing address
- Telephone or mobile phone number
- Payment details (credit card number, billing information, and related financial data necessary to process orders)

2.2 Automatically Collected Information

When you visit our Website, certain information is collected automatically through your browser or device. This may include:

- Internet Protocol (IP) address
- Browser type and version
- Device information (device type, model, operating system, and version)
- Referring URLs and exit pages
- Pages visited on our Website and the order in which they were viewed
- Time spent on individual pages and the Website overall
- Date and time of access

2.3 Information from Cookies and Similar Technologies

We use cookies, pixel tags, web beacons, and similar tracking technologies to collect information about your browsing activity on our Website. Further details about our use of cookies are set forth in Section 4 of this Policy.

2.4 Order and Transaction Data

When you make a purchase, we collect information related to the transaction, including the products ordered, order value, shipping details, payment method, and transaction history.

2.5 Communication Data

We retain records of communications between you and Su Ma Highland Artisan, including emails, contact form submissions, customer service interactions, and any feedback or reviews you provide.

3. How We Use Your Information

We use the personal information we collect for the following purposes:

3.1 Order Processing and Fulfillment. We use your personal information to process, fulfill, and ship your orders, including verifying payment, confirming order details, and coordinating with shipping and logistics providers.

3.2 Communication. We use your contact information to communicate with you regarding your orders, respond to inquiries, provide customer service, and address any issues or concerns you may raise.

3.3 Marketing and Promotional Communications. With your consent, we may send you marketing and promotional emails about our products, new collections, special offers, and events. You may opt out of receiving marketing communications at any time (see Section 6).

3.4 Website Improvement. We analyze usage data and feedback to improve the functionality, content, and user experience of our Website, as well as to develop new products and services.

3.5 Analytics and Trend Analysis. We use aggregated and anonymized data to analyze Website usage patterns and trends, helping us understand how visitors interact with our Website.

3.6 Fraud Prevention and Security. We process personal information to detect, prevent, and respond to fraud, unauthorized access, and other potentially illegal or harmful activities.

3.7 Legal Compliance. We may use and disclose personal information as necessary to comply with applicable laws, regulations, legal processes, or enforceable governmental requests.

4. Cookies and Tracking Technologies

4.1 What Are Cookies

Cookies are small text files that are placed on your device (computer, tablet, or mobile phone) when you visit a website. Cookies enable the website to recognize your device, remember your preferences, and provide a more personalized experience. Cookies may be set by the website you are visiting (“first-party cookies”) or by third-party services operating on that website (“third-party cookies”).

4.2 Types of Cookies We Use

Essential/Necessary Cookies. These cookies are strictly necessary for the operation of our Website. They enable core functionality such as shopping cart management, account authentication, and secure checkout. These cookies cannot be disabled without significantly impairing Website functionality.

Analytics Cookies. These cookies collect information about how visitors use our Website, including which pages are visited most often, how visitors navigate between pages, and whether visitors encounter error messages. The information collected by these cookies is aggregated and used solely to improve Website performance.

Functionality Cookies. These cookies allow our Website to remember choices you make (such as your language preference or region) and provide enhanced, personalized features.

Marketing/Advertising Cookies. These cookies are used to deliver advertisements that are relevant to you and your interests. They may also

be used to limit the number of times you see a particular advertisement and to measure the effectiveness of advertising campaigns.

4.3 Third-Party Cookies

Our Website may use third-party cookies set by service providers such as Google Analytics and social media platforms. These third-party cookies are governed by the respective privacy policies of those third parties, and we encourage you to review them.

4.4 Managing Cookies

You can manage or disable cookies through your browser settings. Most web browsers allow you to control cookies through their settings. You may choose to block all cookies, accept only first-party cookies, or delete cookies when you close your browser. Please note that disabling or deleting cookies may affect the functionality of our Website, and certain features may not operate as intended.

5. Analytics

5.1 We use third-party analytics services, including Google Analytics, to help us understand how visitors interact with our Website. These analytics tools use cookies and similar technologies to collect information such as your IP address, browser type, referring and exit pages, pages viewed, time spent on pages, and the date and time of your visit.

5.2 The information collected by analytics tools is used solely for the purpose of evaluating Website usage, compiling statistical reports on Website activity, and improving the content and structure of our Website. This data is generally processed in an aggregated and anonymized form.

5.3 Google Analytics operates under Google's own privacy policy. For more information about how Google collects and processes data, please visit Google's Privacy & Terms page. You may opt out of Google Analytics

tracking by installing the Google Analytics Opt-Out Browser Add-on, available from Google.

5.4 You may also opt out of analytics tracking by adjusting your cookie preferences or browser settings as described in Section 4.4 of this Policy.

6. Email Communications

6.1 Transactional Emails. When you place an order with us, we will send you transactional emails, including order confirmations, payment receipts, shipping notifications, and delivery updates. These communications are necessary for the performance of our contract with you and are not subject to marketing opt-out preferences.

6.2 Marketing Emails. We send marketing and promotional emails only to individuals who have provided their prior consent to receive such communications. Marketing emails may include information about new products, artisan collections, seasonal promotions, and special events.

6.3 Unsubscribing. You may unsubscribe from marketing emails at any time by clicking the “unsubscribe” link included at the bottom of each marketing email or by contacting us at **mathixu490@gmail.com**. We will process your unsubscribe request promptly, typically within ten (10) business days.

6.4 Please note that unsubscribing from marketing emails does not affect your receipt of transactional emails related to your orders or account.

7. Data Sharing and Third Parties

7.1 Su Ma Highland Artisan does not sell, rent, or trade your personal information to any third party for their independent marketing purposes.

7.2 We may share your personal information with the following categories of third-party service providers, solely to the extent necessary to fulfill the purposes described in this Policy:

- **Payment Processors:** To securely process your payment transactions.
- **Shipping and Logistics Providers:** To fulfill and deliver your orders, including international shipments.
- **Analytics Providers:** To collect and analyze Website usage data (e.g., Google Analytics).
- **Website Hosting Providers:** To host and maintain the technical infrastructure of our Website.

7.3 All third-party service providers with whom we share personal data are contractually required to protect the confidentiality and security of your information and to use it only for the specific purposes for which it was disclosed.

7.4 We may also disclose your personal information if required to do so by law, regulation, legal process, or governmental request, or where we believe disclosure is necessary to protect our rights, your safety, or the safety of others, to investigate fraud, or to respond to a government request.

8. International Data Transfers

8.1 Su Ma Highland Artisan is based in Vietnam. If you access our Website or place an order from outside Vietnam, your personal data may be transferred to, stored in, and processed in Vietnam or other countries where our service providers operate.

8.2 Orders shipped to international destinations require us to share certain personal data (such as your name, shipping address, and phone number) with international shipping and logistics providers to facilitate delivery.

8.3 We take appropriate safeguards to ensure that your personal data is treated securely and in accordance with this Policy when transferred internationally. These safeguards may include contractual provisions with

our service providers requiring them to protect your data to a standard consistent with applicable data protection laws.

8.4 Please be aware that data protection laws may differ from country to country. By using our Website or providing us with your personal information, you acknowledge that your data may be transferred to jurisdictions with different levels of data protection than your country of residence.

8.5 For EU/EEA Customers. Where we transfer personal data from the European Union or European Economic Area to countries outside the EU/EEA that have not been deemed to provide an adequate level of data protection by the European Commission, we rely on appropriate safeguards, such as Standard Contractual Clauses approved by the European Commission, to lawfully facilitate the transfer.

9. Data Retention

9.1 We retain your personal data only for as long as is reasonably necessary to fulfill the purposes for which it was collected, as described in this Policy, unless a longer retention period is required or permitted by law.

9.2 Order and transaction data is retained for as long as necessary to fulfill our legal, accounting, tax, and business obligations. This typically includes retention for the duration required by applicable commercial and tax regulations.

9.3 Marketing and communication preference data is retained until you withdraw your consent to receive marketing communications or request deletion of your data.

9.4 Automatically collected data (such as analytics and log data) is generally retained in an aggregated or anonymized form and may be kept for longer periods for analytical purposes.

9.5 You have the right to request the deletion of your personal data at any time, subject to any legal obligations that may require us to retain certain information. To request deletion, please contact us at **mathixu490@gmail.com**.

10. Data Security

10.1 Su Ma Highland Artisan takes the security of your personal data seriously and implements appropriate technical and organizational measures to protect it against unauthorized access, alteration, disclosure, or destruction.

10.2 Our security measures include, but are not limited to:

- **Encryption:** We use SSL/TLS (Secure Sockets Layer / Transport Layer Security) encryption to protect data transmitted between your browser and our Website.
- **Secure Payment Processing:** All payment transactions are processed through PCI-DSS (Payment Card Industry Data Security Standard) compliant payment processors. We do not store your complete credit card information on our servers.
- **Access Controls:** Access to personal data is restricted to authorized personnel who require it to perform their duties, and such access is granted on a need-to-know basis.
- **Employee Training:** Our team members receive training on data protection practices and their obligations regarding the handling of personal information.

10.3 While we strive to use commercially acceptable means to protect your personal data, no method of transmission over the Internet or method of electronic storage is completely secure. We cannot guarantee absolute security, and you acknowledge that you provide your personal data at your own risk.

11. Your Rights

Depending on your jurisdiction and applicable data protection laws, you may have the following rights with respect to your personal data:

- **Right of Access:** You have the right to request a copy of the personal data we hold about you and to obtain information about how we process it.
- **Right to Rectification:** You have the right to request that we correct any inaccurate or incomplete personal data we hold about you.
- **Right to Erasure (Deletion):** You have the right to request that we delete your personal data, subject to certain legal exceptions.
- **Right to Restrict Processing:** You have the right to request that we restrict the processing of your personal data in certain circumstances.
- **Right to Data Portability:** You have the right to request that we provide your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller where technically feasible.
- **Right to Object:** You have the right to object to the processing of your personal data for certain purposes, including direct marketing.
- **Right to Withdraw Consent:** Where processing is based on your consent, you have the right to withdraw that consent at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

To exercise any of these rights, please contact us at **mathixu490@gmail.com**. We will respond to your request within thirty (30) days of receipt, or within such other timeframe as required by applicable law. We may request verification of your identity before processing your request.

12. GDPR Compliance (For EU/EEA Visitors)

If you are located in the European Union or European Economic Area, the General Data Protection Regulation (EU) 2016/679 (“GDPR”) applies to our processing of your personal data. This section provides additional information relevant to EU/EEA visitors.

12.1 Legal Bases for Processing

We process your personal data on the following legal bases, as applicable:

- **Consent:** Where you have provided your explicit consent to the processing of your personal data for specific purposes, such as receiving marketing communications.
- **Performance of a Contract:** Where processing is necessary to perform our obligations under a contract with you, such as fulfilling an order you have placed.
- **Legitimate Interests:** Where processing is necessary for our legitimate business interests (such as fraud prevention and Website security), provided that such interests are not overridden by your fundamental rights and freedoms.
- **Legal Obligation:** Where processing is necessary to comply with a legal obligation to which we are subject.

12.2 Additional Rights Under GDPR

In addition to the rights listed in Section 11, EU/EEA residents have the right to lodge a complaint with a supervisory authority in the EU/EEA Member State of their habitual residence, place of work, or place of the alleged infringement, if they consider that the processing of their personal data infringes the GDPR.

12.3 Data Protection Contact

For questions or concerns related to data protection under the GDPR, or to exercise your data protection rights, please contact our Data Protection point of contact at **mathixu490@gmail.com**.

13. Vietnam Data Protection Context

13.1 Su Ma Highland Artisan is committed to compliance with the laws and regulations of the Socialist Republic of Vietnam regarding personal data protection. Vietnam's **Personal Data Protection Law** (Law No. 91/2025/QH15, the "PDPL"), enacted on June 26, 2025, and effective from **January 1, 2026**, establishes a comprehensive framework for personal data protection in Vietnam. The PDPL replaced and superseded the earlier Decree No. 13/2023/ND-CP on Personal Data Protection.

13.2 The PDPL adopts a consent-centric approach to personal data processing. Under this framework, consent for the collection and processing of personal data must be voluntary, clear, specific, and verifiable. We obtain consent from data subjects prior to collecting or processing their personal data, and we maintain records of such consent.

13.3 The PDPL classifies personal data into two tiers: **basic personal data** (common personal details and identifiers used in everyday transactions) and **sensitive personal data** (data associated with an individual's privacy that, if infringed upon, could directly affect the lawful rights and interests of individuals or organizations). Sensitive personal data is subject to heightened protection requirements, and we implement additional safeguards where we process such data.

13.4 Under Vietnamese law, data subjects have the right to be informed about the processing of their personal data, the right to consent or withdraw consent, the right to access their personal data, the right to request rectification or deletion of their data, and the right to request

restriction of data processing. We respect and uphold these rights in accordance with the PDPL.

13.5 Cross-border transfers of personal data are subject to specific requirements under the PDPL, including the preparation of a cross-border data transfer impact assessment and compliance with conditions prescribed by the Government of Vietnam. We ensure that any international transfer of personal data originating from Vietnam is conducted in accordance with these requirements.

14. Children's Privacy

14.1 Our Website is not directed at, and is not intended for use by, children under the age of sixteen (16). We do not knowingly collect personal data from children under 16 years of age.

14.2 If we become aware that we have inadvertently collected personal data from a child under 16, we will take prompt steps to delete such information from our records.

14.3 If you are a parent or guardian and believe that your child has provided personal data to us, please contact us at **mathixu490@gmail.com** so that we can take appropriate action to delete the information.

15. Third-Party Links

15.1 Our Website may contain links to third-party websites, services, or platforms that are not operated or controlled by Su Ma Highland Artisan. These links are provided for your convenience and informational purposes only.

15.2 We are not responsible for the privacy practices, content, or security of any third-party websites. The inclusion of a link on our Website does not imply endorsement of the linked site or its practices.

15.3 We strongly encourage you to review the privacy policies of any third-party websites you visit before providing them with any personal information.

16. Changes to This Privacy Policy

16.1 We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, legal requirements, or operational needs. Any changes will be effective upon posting of the revised Policy on this page.

16.2 When we make changes to this Policy, we will update the “Effective Date” at the top of this page. For material changes that significantly affect the way we collect, use, or share your personal data, we will endeavor to notify you by email (if you have provided your email address) or by posting a prominent notice on our Website prior to the change becoming effective.

16.3 Your continued use of the Website after any changes to this Policy constitutes your acceptance of the revised Policy. We encourage you to review this Policy periodically to stay informed about how we protect your personal data.

17. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our data protection practices, please contact us using the following information:

Su Ma Highland Artisan

Sa Pa Highlands, Vietnam

Email: mathixu490@gmail.com

Phone: +84 36 437 5705

Website: sumahighlandartisan.com

We will endeavor to respond to all inquiries within a reasonable timeframe and in accordance with applicable law.

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