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# Personal Information Protection Policy

## 1. Purpose

The company has established an information security management system by formulating personal information protection guidelines and setting personal information protection goals to enhance the personal information protection awareness of all employees. The goal of this document is to implement the personal information protection policy and various control measures, protect the business system and the company's personal information assets, guard against the occurrence of personal information protection incidents, and minimize the impact of such incidents so as to ensure the continuity of business activities, win the trust of enterprises, and improve the company's social image and credibility.

## 2. Definition of Terms & Abbreviation

Personal information : Various types of information recorded electronically or otherwise that can identify a natural person, either alone or in combination with other information, including biometrics, location, behavior, and other information related to identifying a natural person, such as name, date of birth, ID number, personal account information, address, phone number, fingerprint, iris, etc.

Personal information subject: A natural person identified by personal information.

## 3. Management Regulation

### 3.1 Personal information protection policy

To ensure compliance with personal information related laws and regulations, effectively implement personal information protection management, prevent risks, improve personal information protection control measures, and boost customer confidence, the company establishes a personal information protection management system according to ISO / IEC 27701: 2019, ISO / IEC 29151: 2017, and ISO / The IEC 27001: 2013 standards and promises as follows:

- 1) To build a complete organizational structure of personal information protection management at all levels, determine personal information protection policies, security objectives and control measures, and clarify the management duties of personal information protection;
- 2) To identify and meet laws, regulations about personal information protection, and requirements from customer and other relevant parties;
- 3) To collect and process personal information based on the principle of personal information

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protection to comply with laws and regulations;

- 4) To establish a complete personal information protection framework, clarify the objectives of personal information protection, and make sure that personal information risks are reduced;
- 5) To perform management activities at regular intervals including risk assessment and personal information impact assessment, internal audit and management review of the management system, and take corrective and preventive measures to ensure the continuous effectiveness of the system;
- 6) To adopt advanced and effective facilities and technologies to process, transfer, store and protect all types of personal information;
- 7) To provide continuous education and training on personal information protection for the staff, and keep enhancing the awareness and ability of employees' personal information protection;
- 8) To establish a continuous improvement mechanism for personal information management and ensure constantly improved personal information protection capabilities;
- 9) To formulate and maintain a sound business continuity plan for sustainable development ;
- 10) To review the applicability and adequacy of the basic policy regularly in light of actual conditions, and revise it when necessary.

The company will improve personal information protection activities, comprehensively implement reasonable control measures based on the personal information management life cycle and promise as follows:

- 1) The company publicizes the importance and strategy of personal information protection to all staff so that each staff member is cooperative and values the work of personal information protection; earnestly implements the basic rules and regulations for personal information protection and management regulations formulated by the company ;
- 2) When obtaining, using or providing personal information, the company will adopt legal and fair means, and obtain the consent of the information subject in advance to use it within the scope of its purpose. It will also implement relevant safety protection measures ;
- 3) To guarantee the security of personal information, the company takes security measures such as information security protection countermeasures to prevent illegal access to and loss, destruction, tampering, and leakage of personal information ;
- 4) When sharing personal information with a third party , the company must obtain the consent of the information subject in advance, and take necessary measures in accordance with the requirements of personal information protection standard to prevent leakage of personal information by third parties;
- 5) When the information subject requests to disclose, modify, or stop using personal information, the company will adopt appropriate methods to implement corresponding cooperation in

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accordance with the relevant requirement of the company's personal information protection ;

- 6) The company has established systems such as continuous improvement of the personal information protection management system to better implement the company's personal information protection related regulations ;
- 7) The company will release the personal information protection policy, and adopt appropriate training and publicity means to make it easy to read, understand, and implement;
- 8) The company will also strengthen communication with its partners and stakeholders through various channels so they can understand the company's personal information protection policies.

### **3.2 Personal information protection goals**

The personal information protection objectives are as follows:

- 1) Zero leakage of personal sensitive information;
- 2) Over 98% timely updates of the impact assessment of personal information.

### **3.3 Personal information protection principles**

- 1) Consent and choice

The company provides necessary technologies and methods to enable the subject of personal information to exercise meaningful, informed, clear and free consent and choice.

- 2) Purpose, legitimacy and guideline

The company will clarify the purpose of collecting and using personal information to ensure compliance with laws and regulations of relevant countries and regions, and communicate clearly with the subject of personal information.

- 3) Restrictions on collection

The company will take appropriate control measures to limit the type and amount of personal information collected in the scope of applicable laws and regulations.

- 4) Principle 4 Data minimization

The company will establish relevant mechanisms to reasonably control the amount of personal information collected and processed.

- 5) Use, retention and disclosure restrictions

The company's use of personal information is consistent with the stated purpose, and stores such information in accordance with the stated purpose and applicable laws and regulations.. Personal information may not be disclosed to external parties without prior informed consent of the personal information subject unless such disclosure is permitted by relevant laws.

- 6) Accuracy and quality

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The company will take necessary technologies and means to ensure that the personal information collected is accurate, relevant, timely and complete.

7) Openness , transparency and notice

The company will define a clear and unambiguous privacy statement and ensure that personal information subjects are notified promptly and accurately.

8) Individual participation and access

The company will provide a reasonable way for the subject of personal information to access their personal information and to make corrections or deletions.

9) Accountability

The company will clarify roles and responsibilities of personal information management, and establish a personal information risk management and breach management mechanism.

10) Information security

The company will establish an information security management framework in accordance with international best practices in information security management to provide effective and reliable protection of personal information.

11) Privacy compliance

The company will comply with the requirements of relevant laws and regulations and supervisory authority, and conduct regular compliance assessments and reports.

### **3.4 Update of personal information protection policy and objectives**

The management should review personal information protection policies and goals at a management review meeting each year, and update them based on the company's strategic goals and communicate to relevant personnel through meetings, emails or phone calls to maintain consistency between personal information protection policies and objectives and the company's strategic goals.

### **3.5 Realization of personal information protection goals**

To achieve security objectives, a risk assessment and personal information impact analysis should be performed first, and relevant risk treatment plans should be executed based on the results of the risk assessment and personal information impact analysis. The company must also establish a personal information protection management system document and design the corresponding form template in accordance with ISO / IEC 27001: 2013 and ISO / IEC 29151: 2017 And ISO / IEC 27701: 2019 requirements.

The staff must strictly implement relevant regulations without deliberately violating the rules and regulations related to the protection of personal information.

The company shall measure and evaluate personal information protection targets after the annual internal audit and before the management review, record them in the management system effectiveness

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measurement form, and report to the management the achievement of the targets at the review meeting.