

Compal Group - Policies and Regulations for the Protection of Personal Data and Privacy

● **Purpose**

- For the purpose of fulfilling the protection of personal data and privacy, and the management thereof so as to avoid infringement of moral rights and to promote reasonable use of personal data, Compal Electronics, Inc. and its affiliates (hereinafter referred to as "COMPAL", or "We", "us", "our") establish these Policies and Regulations for the Protection of Personal Data and Privacy (hereinafter referred to as the "Regulations") in accordance with the "Personal Data Protection Act", "Enforcement Rules for the Personal Data Protection Act", and other applicable laws and rules governing the protection of personal data and privacy (such as the European Union's "General Data Protection Regulation" or GDPR, and the "California Consumer Protection Act" or CCPA) as the basis for the implementation of protecting and managing personal data and privacy.

● **Applicable Targets and Scope of Application**

- All employees of COMPAL and personnel of the customers, suppliers, contractors, external consultants and vendors of COMPAL shall be governed by the Regulations. The personal data of the visitors, investors, signatory parties and litigants, the users, personnel of the corporate clients, suppliers and vendors of our products or services, and the applicants for our jobs are also protected by the Regulations.

● **Personal Data and Privacy Protection Policy**

- We shall process personal data just for management purpose and within reasonable scope;
- We shall inform the individuals concerned our ways of using their personal data;
- Processing of relevant and appropriate personal data in compliance with laws;
- Keeping a list of personal data by category for processing in the organization;
- We shall keep personal data only as required or controlled by law or for the legitimate purpose of the organization. We generally keep personal data for a period of 5 years unless otherwise agreed with the parties concerned, or the specific purpose of keeping the data no longer exists or at the expiration of the agreed time limit;
- We duly respect the rights of individuals over their personal data, including the right to access to the subject matter;
- Protection of the security of personal data;
- We only transfer personal data offshore with adequate and appropriate protection;
- Development and implementation of the personal data management system for the proper pursuit of the policy.
- Identifying, where appropriate, internal interested party and external interested party, and the extent to which they are involved in the governance of the organization's personal data management system; and
- Assuring the specific duties of the personal data management system and assuming the responsibilities thereof.

● **Definition of Personal Data**

- Personal data: Including but not limited to a national person's the name, gender, date of birth, ID No., passport No., specific features, fingerprint, marital status, family, education, occupation, medical history, medical treatment, genetic factor, sex life, health examination, criminal record, contact information, financial condition, data

concerning a person's social activities, facial image, data collected by COMPAL cookies, certificates for proof of education and professional qualification of the applicants for jobs, and any other data that helps to directly or indirectly identify the persons as in the cases of natural persons. The definition and scope of personal data may be subject to change in line with any change in the competent authority or the regulatory environment, where the definition and scope of which after the change shall stand.

- For other data on the terms used and definition, please refer to the "Personal Data Protection Act". Personal data hereinafter is referred to as "Data".

- **Definition of Privacy**

- Privacy: This is an integral part of basic human right and is protected by law. This right is unrelated to public interest and group interest and entails data where the party concerned is not willing to disclose to a third party or not suitable for making known to a third party. Likewise, this also entails private matters that the party concerned declines to be intervened by a third party or not suitable for a third party to intervene, and not to be intruded by a third party or not suitable for a third party to intrude.

- **Personal Data Management and Monitoring Mechanisms**

- COMPAL incorporates the right to privacy and Data protection into its scope of risk management at the corporate level, and proceed with the "Risk Management Policies and Regulations" in related operation for reducing the possibility of potential impact. The "Personal Data Management Team" (known as the "Data Management Team" is established across functions for the proper protection of privacy right. This team is responsible for the establishment and management of related mechanisms. This team is led by the Information Security Committee where other functional departments are invited to the team. The roles to be played by respective functional departments and the authorities and responsibilities thereof in the Data Management Team shall be governed by separate internal management rules and regulations.
- COMPAL conducts periodic or non-aperiodic internal and third-party audits for understanding the performance of the Data management mechanisms. The measures for protecting personal data and related procedures are subject to audit for assuring conformity to applicable laws and regulations, and management systems for the perpetual effectiveness of the Data management mechanisms.

- **Operation**

- Personal Data Basic Application Principles
 - ◆ The principle of restrictive collection: Data shall be collected at the right place in lawful and fair means at the consent of the party concerned or as permitted by law.
 - ◆ The principle of data content: Fitting the specified purpose of collecting personal data with assurance of the consistency of data.
 - ◆ The principle of specified purpose: Explain the purpose of collection to the party concerned before proceeding to collect personal data. The data collected cannot be used for any other purposes beyond the scope previously specified for the collection of the data. In other words, personal data shall be collected, processing, and used solely for serving the specified purpose at the beginning and shall not be used for any secondary purpose. We will also continue to

- monitor and manage the status of related data.
 - ◆ The principle of restricted use: COMPAL may use the personal data as collected within the scope of the specified purpose only, and will not disclose, sell the said data to a third party (including but not limited to official institutions or private enterprises) or beyond the aforementioned specified purpose unless at the consent of the party concerned in writing or as permitted by law.
 - ◆ The principle of security protection: Reasonable and secure measures ought to be taken for the protection of the data to avoid the risks of missing, theft, damage, modification or disclosure.
 - ◆ The principle of transparency: The development, collection, use, and policies pertinent to personal data shall be transparent within the scope as permitted by law.
 - ◆ The principle of responsibility and obligation: Data management staff of all functional departments shall assure the proper pursuit of our policies and duly observe the aforementioned principles.
- COMPAL shall provide the following rights to the parties concerned in personal data within the scope as permitted by law:
 - ◆ Inquiry or request for access to data.
 - ◆ Request for making duplicated copies.
 - ◆ Request for providing supplementary data or correction.
 - ◆ Request for stop collecting, processing or use.
 - ◆ Request for deletion.
 - ◆ If the party concerned is a resident within the EU economic zones, this party is entitled to claim/request for restrictive processing, and to transfer the personal data in an organized, generally usable and machine readable form where possible according to GDPR rules.
- **Zero Tolerance Policy**
 - COMPAL periodically provides training in privacy protection to all personnel and assesses the effectiveness of the training.
 - COMPAL pursues a zero tolerance policy in the protection of privacy. Any person who acts in defiance or in violation of this policy shall be subject to disciplinary action in accordance with the personnel administration code, employees reward and punishment rules and related rules and regulations of COMPAL. Depending on the seriousness of the circumstances, COMPAL will engage law enforcement proceedings.
- **Complaint and Report Mechanisms**
 - In the event of incident or situation that may inflict damage to the rights and privileges of individuals, and/or any incident in violation of the Regulations, employees of COMPAL, external entities, or any natural person may report or file a complaint with us at the privacy right protection hotline at +886287978588#14385, or to the e-mail at Compal_PIR@compal.com. We shall strictly protect the information on the informants for the protection of their rights.
- **Cookies**
 - We will collect the personal data on visitors to COMPAL website by different means. Most personal data received by us is from persons who voluntarily provide the information in order to obtain information on the products and services of COMPAL, or collected from technical mean. When visitors surfing through the website of

COMPAL, our IT system may collect related passive information, including the Internet IP address of the visitors, browser type, and the operating system.

- We use Cookies to collect data on the date and time of the visits from visitors. Cookies for temporary purposes will be deleted once the visitors turn off the browser. Perpetual or permanent Cookies will stay in the device of the visitor until the visitor delete the Cookies manually, or until the time limit for deleting Cookies set up by the visitor at the browser.

- **Third Party Links and Service**

The website of COMPAL may be linked to the service of a third party website. However, COMPAL will not intervene or be responsible for the practice of privacy right or the content of privacy right of such third party website. Visitors should be discreet with the privacy protection policy of these websites.

- **Change in the Regulations**

COMPAL will revise the Regulations from time to time for assuring our very purpose of protecting personal data, privacy right, and cyber security. COMPAL will post the update version of related clause at its official website immediately after amendment. You are advised to check the Regulations from time to time for access to the latest and necessary information.