

Chicony Power Technology Co., Ltd.

Personal Data and Privacy Protection Policy

Purpose

Chicony Power Technology Co., Ltd. (hereinafter referred to as the “Company”) is committed to protecting the personal data and privacy rights of employees, customers, suppliers, and other stakeholders.

In accordance with the Personal Data Protection Act and applicable laws and regulations, and with reference to internationally recognized privacy principles (such as *the General Data Protection Regulation*, GDPR), the Company establishes a personal data protection management framework to ensure that the collection, processing, use, and protection of personal data comply with legal requirements, while strengthening corporate governance and risk management.

Scope of Application

This Policy applies to all personal data collected, processed, and used by the Company in the course of its operations, including but not limited to:

- Employees and job applicants
- Customers
- Suppliers and business partners
- Other stakeholders

Definition of Personal Data

“Personal data” refers to any information that can directly or indirectly identify a natural person, including but not limited to:

- Name and contact information
- Identification data
- Images and communication records
- Transaction and interaction records

Sensitive personal data as defined under Article 6 of the Personal Data Protection Act (e.g., medical records, healthcare data, genetic data, sexual life, health examinations, and criminal records) shall not be collected, processed, or used by the Company unless explicitly permitted by applicable laws.

Principles of Personal Data Collection

When collecting personal data, the Company shall adhere to the following principles:

1. Clearly define the purpose of collection and provide proper notice to data subjects
2. Inform data subjects of their rights and the impact of not providing data
3. Obtain consent where required by law
4. Collect data on a minimum necessary basis
5. Only omit notification where legally permitted, and retain supporting legal justification

Processing and Use of Personal Data

1. Personal data shall be processed and used only for purposes consistent with the original collection purpose and in compliance with applicable laws
2. Personal data shall not be disclosed to third parties without proper authorization
3. Personal data shall not be used beyond the necessary scope unless required by law or consented to by the data subject

Personal Data Protection Measures

The Company implements appropriate administrative and technical measures to ensure the security of personal data, including but not limited to:

1. Administrative Measures

- Establishment of access control mechanisms
- Employee training on personal data protection

2. Technical Measures

- Implementation of system access controls
- Establishment of data backup and recovery mechanisms
- Adopt information security measures such as data loss prevention (DLP) and encrypted data transmission

Third-Party Engagement and Cross-Border Transfer

1. The Company shall not arbitrarily provide personal data to third parties
2. The Company's website may contain links to third-party services; such third parties are not under the Company's control, and users should review their respective privacy policies
3. As a multinational enterprise, the Company may transfer personal data across jurisdictions within its affiliated entities for legitimate business purposes, in compliance with applicable laws
4. When engaging third parties, the Company shall:
 - Execute confidentiality or relevant agreements
 - Require appropriate data protection measures
 - Ensure incident prevention, reporting, and response mechanisms
 - Ensure compliance with this Policy and applicable laws

Data Retention and Deletion

Personal data shall be retained only for the period necessary to fulfill the purpose of collection. Upon expiration of the retention period, data shall be deleted or anonymized in accordance with applicable laws and internal procedures.

Rights of Data Subjects

Data subjects may exercise the following rights in accordance with applicable laws:

1. Request access to or review of personal data
2. Request copies
3. Request supplementation or correction
4. Request cessation of collection, processing, or use
5. Request deletion

For individuals located in the European Union, additional rights under GDPR may apply, including:

- Right to restriction of processing
- Right to data portability

The Company shall not discriminate against or refuse services due to the exercise of these rights, unless otherwise required by law.

Personal Data Incident Management

1. In the event of unauthorized access, alteration, disclosure, or other incidents involving personal data, the Company shall promptly investigate and take appropriate actions
2. Where necessary, the Company shall notify affected individuals and relevant authorities
3. The Company adopts a zero-tolerance approach to violations, and any misconduct will be handled in accordance with applicable laws and internal regulations

Management Mechanism and Continuous Improvement

1. The Company shall periodically or as necessary review the appropriateness of its personal data protection measures
2. Improvement actions shall be taken based on risk assessments to enhance effectiveness
3. Relevant management activities shall be properly documented for tracking and review purposes

Contact and Complaint Mechanism

For any inquiries, suggestions, complaints, or requests to exercise rights regarding personal data protection, please contact hotline@chiconypower.com. The Company will handle such matters in accordance with established procedures and ensure the confidentiality of complainants, unless disclosure is required by law.

Policy Revision

This Policy shall be reviewed and updated as necessary in response to changes in laws, business operations, or risk conditions.

President : 