

Dynamic Holding Co	Administrative Policy	Policy No.	
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	Protection and Management of Personal Data	Pages	Page 1 of 5
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1. Purpose:

The purpose of this Policy is to implement the protection and management of the personal data according to the "Personal Data Protection Act" promulgated by the Executive Yuan (hereinafter referred to as the "PDPA," as provided in Annex 8.1).

2. Scope:

This policy applies to the personnel of the Company and the suppliers who provide services to the Company.

3. Definition:

3.1 Personal Data: shall mean the personal data and personal data file defined in Articles 2.1 and 2.2 of the PDPA.

3.2 Data Management Unit (or Responsible Unit): shall mean the business execution unit that collects, processes and uses data for its business and business execution.

3.3 Each Unit: shall mean all the administrative and business-related units of the Company.

4. Responsibility:

In order to implement the protection and management of the Personal Data, the company sets up a personal data protection execution team (hereinafter referred to as the "Personal Data Team"). The Personal Data Team is composed of management representatives, management teams and internal evaluation team assigned by the top management.

The tasks of the Personal Data Team are below:

- (1) Propose the Personal Data Protection Policy of the Company.
- (2) Promote the Personal Data management system of the Company.
- (3) Assess and manage of the Personal Data privacy risks of the Company.
- (4) Propose Personal Data protection awareness raising, and education and training plans for employees of Each Unit of the Company (hereinafter referred to as "Each Unit").
- (5) Assess the personal data management system infrastructure of the Company.
- (6) Examine, review and evaluate the legality and appropriateness of the Personal Data management system of the Company.
- (7) Response, handle, report and drill the Personal Data security incidents of the Company.
- (8) Other planning and implementation matters related to Personal Data protection and management of the Company.

5. Process:

N/A

6. Contents

6.1 The Personal Data Team meeting may, depending on the needs for promotion of the Company's business, be held from time to time depending on the needs of business promotion, which shall be chaired by the management representative. If the management representative is unable to chair the meeting for some reason, a member of the management team may be designated to hold the meeting.

6.2 Each Unit should assign a dedicated person to handle the following matters:

6.2.1 Assess the requests made by the data subjects according to Article 10 and Articles 11.1-11.4 of the PDPA.

6.2.2 Assess the notice made by a data subject according to Article 11.5 and Article 12 of the PDPA.

6.2.3 Provide consultation regarding the Personal Data protection laws and regulations.

6.2.4 Serve as the coordinator and contact for Personal Data protection matters.

6.2.5 Provide the notification of the Personal Data damage prevention and crisis management response within the unit.

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- 6.2.6 Implement the Personal Data protection guidelines and policies of the Company, and conduct self-examination of Personal Data protection within the unit.
- 6.2.7 Plan and implement the Personal Data protection management in other units.
- 6.3 The head of the Company's human resources department serves as the contact for Personal Data protection and handles the following matters:
- 6.3.1 Serve as the coordinator and contact for Personal Data protection matters between the Company and government agencies, and provide government agencies with any emergency response notification.
- 6.3.2 Provide the notification of non-informative Personal Data security incidents.
- 6.3.3 Serve as the single contact for the public in case of major Personal Data breach.
- 6.3.4 Prepare and update the Company's dedicated personnel roster of Personal Data.
- 6.3.5 Compile the Company's training lists and records of the dedicated personnel of Personal Data and employees.
- 6.4 Collection, Processing and Use of Personal Data
- 6.4.1 Each Unit should ensure that the collection, processing, use or international transmission of Personal Data is carried out in a way that respects the data subject's rights and interest, in an honest and good-faith manner, and shall be within the minimum and not exceed the necessary scope of specific purposes, and shall have legitimate and reasonable connections with the purposes of collection.
- 6.4.2 Each Unit shall strictly comply with Article 5 of the PDPA when collecting, processing or using Personal Data. Any concern or doubt should be submitted to the Personal Data team for discussion.
- 6.4.3 When collecting, processing or using Personal Data related to medical records, healthcare, genetics, sex life, physical examination and criminal records according to the proviso to Article 6.1 of PDPA must be submitted to the Personal Data Team for permission before such collection, processing or use.
- 6.4.4 When Each Unit collects Personal Data, the data subject should be informed specifically of the following matters. The job applicants must also complete the "Notice of Personal Data Collection" (Appendix 8.2)" when they go to the Company for interviews. However, this provision does not apply to the circumstances set out in Article 8.2 of the PDPA:
- 6.4.4.1 The name of agency or unit.
- 6.4.4.2 The purpose of collection.
- 6.4.4.3 The categories of Personal Data.
- 6.4.4.4 The time period, territory, recipients, and methods of which the personal data is used.
- 6.4.4.5 The rights and methods that the data subjects may exercise according to Article 3 of the PDPA.
- 6.4.4.6 The data subjects are free to choose to provide Personal Data without affecting their rights and interests.
- 6.4.5 If the Personal Data collected by Each Unit is not provided by the data subjects, the source of the Personal Data and the matters listed in Articles 8.1.1 to 8.1.5 of the PDPA should be informed to the data subjects before processing or using their Personal Data. However, this provision does not apply to the circumstances set out in Article 9.2 of the PDPA. The obligation to inform set out in the preceding paragraph may be made at the same time as using the Personal Data of the data subjects for the first time. The Personal Data is collected before the effective date of amendment to

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the PDPA which is not provided by the data subject, the obligation to inform shall be performed according to the PDPA, except for circumstances that may be exempted from the obligation to inform set out in Article 9.2.

- 6.4.6 Each Unit should obtain the written consent of the data subjects if such written consent is required according to Article 19.5 and the proviso to Article 20.6 of the PDPA.
- 6.4.7 When Each Unit collects, processes, and uses Personal Data according to Article 19 or Article 20 of the PDPA, such collection, processing and use shall be reviewed in detail and submitted for the written approval. All units that use Personal Data not for the specific purposes set out in the proviso to Article 19 of the PDPA, should keep the use of Personal Data for records. The use of Personal Data shall not be arbitrarily linked to the database and shall not be abused for any purpose.
- 6.4.8 If the Personal Data held by the Company is incorrect or omissive, it should be transferred to the data storage unit for correction or supplementation after the data collection unit obtains the written approval, and relevant records shall be retained.
- 6.4.9 If there is any dispute regarding the accuracy of the Personal Data held by the Company, the Personal Data shall be transferred to the data retention unit to cease processing or using after the data collection unit obtains the written approval. However, this provision does not apply to the circumstances set out in Article 6.5 of this PDPA. For Personal Data processing or use that has been ceased, the data retention unit should keep the records properly.
- 6.4.10 When the specific collection purpose of Personal Data held by the Company no longer exists, or upon expiration of the retention period, such Personal Data shall be transferred to the data retention unit to proceed with the erasing and cease processing or using after the data collection unit obtains the written approval. However, this provision does not apply to the circumstances set out in the proviso to Article 6.4.5 of this PDPA. For Personal Data that has been deleted, ceased processing or using, the data retention unit should keep the records properly.
- 6.4.11 For Personal Data which shall be deleted, or ceased collecting, processing or using on its own initiative or upon the request of the data subjects, Each Unit shall transfer such Personal Data to the data retention unit to proceed with the deleting and cease processing or using after the data collection unit obtains the written approval. For Personal Data that has been deleted, ceased collecting, processing or using, the data retention unit should keep the records properly.
- 6.4.12 In case any Personal Data is stolen, disclosed, altered, or otherwise infringed upon as set out in Article 12 the PDPA, Each Unit should issue the notification according to the notification procedure. After identifying the fact, the data breach unit shall report the incident according to the Company's applicable information release procedure to release the message and notify the data subject as soon as possible in a proper way.
- 6.5 Procedure for data subjects to exercise their rights
- 6.5.1 When a data subject makes a request to the Company according to Article 6.4.4 and Article 6.4.5 of the PSPA, he/she shall complete the "Personal Data Request Form" (Annex 8.3) and attach the relevant supporting documents. If there are any omissions or deficiencies in the contents of the documents set out in the preceding paragraph, a notice shall be issued to the data subject within a given timeline to make corrections. The request made by the data subject shall be rejected in writing upon the occurrence of any of the following:

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- 6.5.1.1 There is any omission or deficiency in the request documents, and such omission or deficiency has not been mended within the given timeline.
- 6.5.1.2 The request made by the data subject falls into any of the circumstances set out in the proviso to Article 10 of the PDPA.
- 6.5.1.3 The request made by the data subject falls into any of the circumstances set out in the proviso to Article 11.2 or the proviso to Article 11.3 of the PDPA.
- 6.5.1.4 The request made by the data subject is not in compliance with the laws and regulations.
- 6.5.2 The approval or extension of the request made by a data subject according to Articles 10 and 11 of the PDPA shall be processed within the timeline set out in Article 13 of the PDPA, and the reasons shall be notified in writing to the requester.
- 6.5.3 When a data subject accesses his/her personal data, he/she should be accompanied by the contact of the Personal Data protection team of Each Unit, and such access should follow the Company's applicable document and record access procedures.
- 6.5.4 For Personal Data files that are of a special nature or whose file names should not be disclosed as otherwise required by the law, they may be restricted from disclosure or not provided according to the Freedom of Government Information Law or other legislations.
- 6.6 Security maintenance of Personal Data files
 - 6.6.1 In order to prevent Personal Data from being stolen, altered, damaged, destroyed or disclosed, Each Unit of the Company should implement the security and maintenance measures of Personal Data files according to this Policy and the applicable laws and regulations.
 - 6.6.2 A management system should be established for the Personal Data files, classified and managed by different levels, and the safety management rules should be established for those who have access to the Personal Data files.
 - 6.6.3 All units should carry out emergency response measures and report Personal Data security incidents when Personal Data files are maliciously damaged, accidentally damaged or other dangerous incidents, or when there are illegal intrusions such as hacker attacks.
 - 6.6.4 In addition to this Policy, the security maintenance of Personal Data files should also comply with the application Personal Data protection, information operation security and confidentiality protection regulations required by the laws, the competent authorities and the Company.

7. Supplementary provisions:

- 7.1 If the Company delegates any third party to collect, process or use Personal Data for and on behalf of the Company according to Article 4 of the PDPA, this Policy shall apply to such third party.
- 7.2 This Policy is required to be co-signed by the legal department and approved by the Chairman of the Board before implementation. The same procedure applies to amendments and repeal of this Policy.
- 7.3 This Policy shall be published by the Administration Department and shall be implemented from the date of promulgation.

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8. Document References:

- 8.1 Personal Data Protection Act
- 8.2 Notices on collection of Personal Data
- 8.3 Personal Data Request Form