

# Alpha Networks

## Privacy and Personal Data Protection Policy and Management

### 1. Purpose :

In order to ensure the proper protection of sensitive, private, and confidential information, documents, and data of customers, partners, suppliers, employees, and other business associates, and to collect, process, use, and internationally transfer personal data only within the necessary scope for specific purposes and in a manner that is legitimately and reasonably related to the purposes of collection, this procedure is hereby established.

### 2. Scope :

Sensitive, private, and confidential information, documents, and data related to the customers, partners, suppliers, employees, and other business associates of Alpha Network.

### 3. Responsible Unit :

3.1 General Manager : The approval of this management procedure. And refers to the responsibilities for approval and guidance of various "policies and objectives" in the regulations.

3.2 Administrative unit : Responsible for the revision, administration, supervision, and enforcement of these management regulations; safeguarding employees' personal data; organizing awareness and training programs; and serving as the complaint and notification contact point for personal data incidents.

#### 3.3 Information Technology Unit:

Responsible for establishing personal data information security protection and management measures, and for implementing information security prevention and incident response mechanisms.

#### 3.4 Audit Unit:

Responsible for auditing whether personal data management processes comply with applicable regulations, proposing improvement recommendations, and consolidating audit results into reports that are regularly submitted to the Board of Directors.

### 4. Operation contents

#### 4.1 The purposes of collection/processing/use of personal data

4.1.1 The Company collects/processes/uses personal data in accordance with the local privacy protection laws and regulations of each regional operation office, as well as the General Data Protection Regulation (GDPR) of the European Union. collect/process/use your personal data for the following purposes (including but not limited to):

4.1.1.1 Providing products and services and related improvements.

4.1.1.2 Communication and marketing

4.1.1.3 Managing our communication/information/security/human affairs systems

4.1.1.4 Website maintenance and communication

4.1.1.5 Recruitment and interview

4.1.1.6 Fulfillment of legal obligations

4.1.1.7 Asserting, exercising or defending legal rights

4.1.1.8 When required, to assist government authorities in carrying out their legal duties

4.1.1.9 When required, to perform the operations management of the Company

- 4.1.2 For the above purposes of 4.1.1, we collect/process/use the following personal data (including but not limited to): name, gender, date of birth, ID card/passport number, workplace, title, telephone number, email address, mailing address, face photo, information collected by cookies on our website, interviewee's educational and professional experience and qualifications and other relevant information that can directly or indirectly identify you.
- 4.1.3 We take strict measures in controlling and protecting personal data collected for different purposes and prohibit any use for purposes other than those for which it was collected.

#### 4.2 Privacy and confidentiality management measures

- 4.2.1 The Company shall properly protect sensitive, private and confidential information, documents and materials of customers, partners, suppliers, employees and other business partners, and shall not collect or use them for purposes other than those for which they are intended, and shall strictly comply with the Company's and legal regulations.
- 4.2.2 When using sensitive personal information, unless otherwise provided by law, or with a contract or written consent from the customer, the information used shall not contain any other relevant information that has not been consented to.
- 4.2.3 In the transaction contracts with customers, the terms of use of customer information should provide a field and signature area for customers to choose whether to agree to provide transaction information or other related information for joint marketing filing, disclosure, referral or interactive use, and should specify the name of the information to be used. However, this does not apply if it is not intended to use customer transaction information or other related information.
- 4.2.4 The relevant clauses of the contracts with customers regarding the interactive use of information, etc., should be clearly written to remind customers.
- 4.2.5 For operations using sensitive data, data related to customers, manufacturers, employees and company operations should be properly stored, kept and managed. Non-responsible employees are not allowed to use the relevant data at will.
- 4.2.6 The information should be used within the scope of the purpose and only by authorized employees. The employee should sign a waiver or consent letter stating that he or she will abide by the confidentiality agreement and respect and protect the privacy of customers.
- 4.2.7 The confidentiality of customer information shall be ensured and maintained. Except as provided in this procedure, or as required by law, or upon formal written request from the competent authority or court, it shall not be disclosed to any third party in any form. If the parties entrust and disclose customer information to a third party to handle business on their behalf, in addition to obtaining the written consent of the provider, they shall sign a contract with the third party to ensure that the third party complies with all the terms of this agreement. However, this limitation does not apply if the client agrees or the information is publicly available and does not harm the client's major interests.

## 4.3 Personal data protection measures

### 4.3.1 Collection of Personal Data

4.3.1.1 In accordance with specific purposes and specific circumstances, the specific purpose should be determined and personal information should be collected within the necessary scope to achieve the specific purpose. The collected personal information should also be checked to see whether it is expressly provided for by law, whether there is a contract or a similar contractual relationship with the parties, whether it is the personal information disclosed by the parties themselves or has been legally disclosed, whether the parties have obtained their written consent, whether it is related to the public interest, or whether the personal information is obtained from generally available sources and there is no prohibition on the parties from processing or using the information, and whether there are other significant interests that are more worthy of protection.

4.3.1.2 The personal data collected by our company is collected in accordance with the relevant laws and regulations of the Taiwan government on personal data protection and in a legitimate and honest manner.

4.3.1.3 Each department head should determine the person within his or her department who is responsible for controlling the personal data held and set the scope of authority for processing.

### 4.3.2 Processing of Personal Data

4.3.2.1 The supervisor shall periodically confirm whether the department's processing of personal data is in accordance with the specific purpose notified to the parties when the personal data is collected, and process the data within the necessary scope to achieve the specific purpose.

4.3.2.2 When processing personal data, it is necessary to check whether there are explicit legal provisions, whether there is a contract or a similar contractual relationship with the party concerned, whether the personal data is disclosed by the party concerned or has been legally disclosed, whether the party concerned has given written consent, whether the personal data is related to the public interest, or whether the personal data is obtained from a generally available source and there is no prohibition on the party concerned from processing or using the data, and whether there are other significant interests that are more worthy of protection, etc.

### 4.3.3 Use of Personal Data

4.3.3.1 The supervisor shall check whether the department's use of personal data is in accordance with the specific purpose notified to the parties when the personal data is collected, and use the data within the necessary scope to achieve the specific purpose to confirm that the personal data used by the department is in accordance with the purpose of use, specific circumstances and necessary limits.

4.3.3.2 When using personal data, it is necessary to check whether there are explicit legal provisions, whether there is a contract or a similar contractual relationship with the party concerned, whether the personal data is disclosed by the party concerned or has been legally disclosed, whether the party concerned has given written consent, whether the personal data is related to the public interest, or whether the personal data is obtained from a generally available source and the party concerned has not been prohibited from processing or using the data, and whether there are other significant interests that are more worthy of protection.

4.3.3.3 If personal information is used for purposes other than those specified, it should be checked whether there are explicit legal provisions, whether it is to promote public interests, to avoid danger to the life, body, freedom or property of the person concerned, to prevent serious harm to the rights and interests of others, and whether it has been approved in writing by the person concerned.

4.3.3.4 When there is joint use of data, it should be confirmed whether there is a notification of joint use, that is, the name of the data joint use unit, the type of personal information, and the method of joint use should be notified to the parties when the data is collected.

4.4 The right to claim damages when the other party is jointly and severally liable for damages due to violation of any provision of this Agreement.

5. Related Documents

5.1 None

6. Appendix

6.1 None