# King's Town Bank Co., Ltd. and Affiliated Enterprises Personal Data Management Objective and Policy

Formulated 01-17-2022 Amended 03-25-2024

## **Article 1 Purpose**

King's Town Bank Co., Ltd. (hereinafter "the Company") and its subsidiaries and subsubsidiaries (hereinafter "Affiliated Enterprises") have formulated the Personal Data Management Objective and Policy (hereinafter "the Policy") protect and manage personal data, comply with the relevant provisions provided by the Personal Data Protection Act (hereinafter "the Act"), protect the rights of the data subjects, and reduce the impact of any personal data infringement incidents.

## **Article 2 Scope**

This Policy Applies to the Company and its Affiliated Enterprises.

The Company and its Affiliated Enterprises shall use the Policy as the basic framework for personal data management and formulate personal data protection rules according to factors such as business type, scale, and applicable laws and regulations.

#### **Article 3 Terms and Definitions**

- Personal data management system: Based on operational risk management, it is used to establish, implement, operate, monitor, review, maintain, and improve personal data management.
- II. Personal data breach: Refers to an event that causes the security of personal data held by the Company or its Affiliated Enterprises to be compromised or threatened due to intentional or negligent human factors or force majeure.
- III. Management level: Includes the board of directors, general manager, and department heads.

## **Article 4 Organization and Duties**

To implement the protection and management of personal data, the Company and its Affiliated Enterprises shall establish a personal data management organization or appoint a dedicated person to maintain personal data file security, review the operation of personal data protection, and comply with the requirements of the Personal Data Protection Act and related laws and regulations.

### **Article 5 Management Objectives and Policies**

- I. The personal data management objectives are as follows:
  - (I) Comply with the nation's various personal data protection laws as well as requirements and decrees from competent authorities.
  - (II) Protect the personality rights of the personal data subjects and ensure legal autonomy in personal data.
  - (III) The collection, processing, and utilization of personal data shall be done in an honest and trustworthy manner, shall not exceed the necessary scope for the specific purpose, and shall be legitimate and reasonably related to the collection purpose.
  - (IV) Provide appropriate security measures for personal data files to ensure proper management and care.
- II. The personal data management policy is as follows:
  - (I) Collect, process, and use personal data within the necessary scope based on legitimate specific purposes and with the consent of the data subjects concerned or under legal circumstances;
  - (II) Personal data shall be stored according to the law or for specific legitimate purposes;
  - (III) Adopt appropriate security measures and strive to use reasonable technologies and methods to protect the personal data collected, processed, and utilized to ensure the security of all personal data;
  - (IV) The Company and its Affiliated Enterprises shall transparently and clearly inform the data subjects of the categories of personal data collected as well as the period, territory, subjects, methods of use, and other statutory matters.
  - (V) The Company and its Affiliated Enterprises shall respect the rights of data subjects over their data, including the right to inquire or request access, request a copy, request to supplement or correct, request to stop collection, processing, or use, and request to delete.
  - (VI) Ensure the accuracy of personal data and update when necessary;
  - (VII) The Company and its Affiliated Enterprises shall establish principles for handling personal data breach or emergency response procedures to deal with incidents such as theft, alteration, damage, destruction, or disclosure of personal data and notify the data subjects according to the relevant operating procedures.

- (VIII) The Company and its Affiliated Enterprises shall ensure the security of all personal data and have appropriate and sufficient transmission mechanisms to ensure the security of personal data transmission domestically and internationally.
- (IX) When entrusting others to collect, process, or use personal data, the Company and its Affiliated Enterprises shall require the entrusted parties to apply the relevant regulations of the Company or its Affiliated Enterprises.
- (X) Establish and implement a personal data management system and comply with personal data management policies;
- (XI) The Company and its Affiliated Enterprises shall clearly define the obligations and responsibilities of all employees in the personal data management system operations.

#### **Article 6 Personal Data Management System Operating Mechanism**

The personal data management system adopts the Plan-Do-Check-Act (PDCA) cycle operation model, which is explained as follows:

- I. Plan and Build (Plan)
  - Establish personal data protection management policies, structures, goals, and related standards, review them regularly, and make timely modifications.
- II. Implementation and Operation (Do) establish or modify the appropriate control mechanisms based on the evaluation plan results.
- III. Supervision and Verification (Check)
  - Supervise the implementation of various operations of the personal data management system and check whether it achieves personal data management objectives.
- IV. Maintenance and Improvement (Act)
  - The Company and its Affiliated Enterprises shall implement corrective and preventive measures based on the results and recommendations of the supervision and audit, as well as improve and implement the necessary control mechanisms to maintain the personal data management system operations continuously.

### **Article 7 Responsibilities of the Management**

Management shall commit to the following matters for all aspects of the personal data management system planning, establishment, implementation, operation, supervision, audit, maintenance, and improvement:

- I. The Company and its Affiliated Enterprises shall determine the objectives and policies of personal data management to ensure that they can meet the development strategy needs of the Company and its Affiliated Enterprises.
- II. Establish roles and responsibilities for personal data management.
- III. Provide resources required for various personal data management system operations.
- IV. Perform audit operations for the personal information management system.
- V. Establish and plan personal data protection management measures.
- VI. Convey the importance of personal data management system implementation.
- VII. Supervise the establishment and implementation of the personal information management system according to Policy requirements.

#### **Article 8 Personal Information Management System Review**

The Company and its Affiliated Enterprises will conduct audits for the personal data management system periodically, occasionally, or when significant changes occur.

#### **Article 9 Continuous Personal Data Management System Improvement**

The Company and its Affiliated Enterprises shall use the audit results or corrective and preventive measures to achieve the objectives of personal data management.

## **Article 10 Policy Guidance and Review**

The Policy shall be evaluated at least once a year to reflect the latest developments in government laws and regulations, information technology, and company business to ensure that personal data management practices can achieve the objectives of personal data management.

#### **Article 11 Policy and Law Compliance**

All employees of the Company and its Affiliated Enterprises shall comply with the Policy. Violators shall be subject to disciplinary action according to relevant regulations. Employees' personal data protection obligations (including confidentiality obligations) to the Company or its Affiliated Enterprises shall remain in effect after the termination of the employment relationship between the two parties.

# **Article 12 Supplementary Provisions**

- I. The formulation and amendment of the Policy shall be announced to the public in a reasonable period and manner to ensure that the data subjects concerned are aware of their rights and shall be included in the internal control and audit system management of the Company and its Affiliated Enterprises.
- II. Matters not covered by the Policy shall be handled according to relevant laws and regulations and the relevant rules of the Company or its Affiliated Enterprises.
- III. The Policy shall be implemented after approval by the board of directors, and the same shall apply when it is amended, which must also be approved by the Audit Committee.