

E.Sun Financial Holding Co., Ltd. and Subsidiaries Personal Information Management Policy

Approved on 2012.8.17 during the 12th Meeting of the Fourth Board of Directors

Amended on 2019.4.24 during the 15th Meeting of the Sixth Board of Directors

Amended during the 16th meeting of the 7th-term board of directors on 2021.11.12

Article 1 (Purpose)

This policy has been established in compliance with "Personal Data Protection Act," "Enforcement Rules of the Personal Data Protection Act," "Financial Supervisory Commission Personal Information File Security Policy for Designated Non-government Institutions" and relevant laws to enforce protection and management of personal information, respond to the changes in personal information management technologies, requirements of the competent authorities and the Company's business needs, and in the best interest of information owners.

Article 2 (Objectives)

The Company's and subsidiaries' goals with regards to personal information management policy are as follows, appropriate mechanisms shall be established to measure the achievement status of the goals:

- I. To comply with local personal information protection regulations, any letters and directives issued by the competent authorities, and the requirements of the competent authorities;
- II. To protect information owners' personal rights by giving them full, legal discretion over their personal information;
- III. To ensure that all personal information is gathered, processed, and used in an honest and trustworthy manner without exceeding the extent necessary to achieve the intended purposes, and that the scope of information gathered is justifiable and rationally associated with the intended purposes;
- IV. To apply appropriate safety measures over personal information files, and thereby fulfill the Company's and subsidiaries' duty of care as prudent managers.

Article 3 (Scope)

- I. This policy applies to all business-related conduct by all employees of

the Company and subsidiaries.

- II. Employees of the Company and subsidiaries are still bound to fulfill their obligations with regards to personal information protection after employment has ended.
- III. Staff assigned by human resource agencies to provide service at the Company's and subsidiaries' premises and business partners which have business dealings the Company or subsidiaries involving customer personal data (including but not limited to partnering vendors, co-branded partners, suppliers) as well as their employees or temporary staff are also bound to comply with this policy under the Personal Data Protection Act.

Article 4 (Organization and responsibilities)

- I. The Company shall develop a personal information management organization, create relevant systems and allocate adequate resources to promote, coordinate, supervise and continually improve personal information management practices within the Company and subsidiaries. Principles concerning the foundation of such an organization shall be addressed in a separate document;
- II. This personal information management organization will assign dedicated departments to oversee the discussion and establishment of personal information management policies, procedures and rules.
- III. The personal information management organization shall identify the external units related to the Company's management of personal information protection when appropriate and understand their requirements for the management of personal information protection of the Company.
- IV. The personal information management organization will assign dedicated departments to oversee the coordination and enforcement of personal information-related practices, and to provide the resources needed to support personal information management operations.

Article 5 (Handling principles)

The Company and subsidiaries shall follow the principles below when handling personal information:

- I. Identify the types of personal information processed, and outline the

scope of information gathered to build a personal information file registry;

- II. Gather, process and make use of the minimum personal information only for legitimate purposes and only to the extent deemed necessary; update and take measures to ensure security of personal information whenever deemed necessary;
- III. Notify information owners precisely how and by whom their personal information will be used;
- IV. Respect owners' rights over their personal information, including the right to inquire, view, duplicate, supplement or amend existing information, and the right to stop the Company and subsidiaries from further gathering, processing and use, and the right to delete personal information held in possession, as well as the rights of the owners conferred by other personal information protection requirements;
- V. Transmit information across borders only when it is properly and adequately protected.
- VI. When personal information is being used under exceptional circumstances permitted by the "Personal Data Protection Act," take extensive care to ensure the applicability and legitimacy of such uses.
- VII. Process the relevant and appropriate personal information in a fair and legal manner;
- VIII. Keep personal information in accordance with the requirements of the laws and regulations or for the purpose of legal operation;
- IX. Develop and implement a robust management framework that supports the personal information protection policy.
- X. Outline employees' responsibilities and obligations under the personal information management framework;
- XI. Maintain the traces and records of personal information gathering, processing and use in an appropriate manner;
- XII. Any violation against personal information files must be resolved in the shortest time possible according to the "Personal Data Protection Act" and the personal information-related rules of the Company and subsidiaries.

Article 6 This policy is subject to evaluation at least once a year to reflect the latest development in government regulations, information technologies, requirements of the competent authority and the Company's business practices, and thereby ensure the appropriateness of personal information management practices. Any violation of laws or this Policy shall be dealt with in accordance with relevant regulations of the Company.

Article 7 Any matters that are not addressed in this policy shall be governed by applicable laws and rules of the Company and subsidiaries.

Article 8 This policy is implemented with the approval of the Board of Directors; the same applies to subsequent amendments.