

O-Bank Personal Information Management Policy

24 February 2021: Implementation approved by resolution of the 6th session of the 8th Board of Directors of the Company.

I. Purpose

O-Bank Co., Ltd. ("O-Bank") adopts this O-Bank Personal Information Management Policy ("this Policy") in order to implement personal information protection and management, to comply with the requirements of the "Personal Data Protection Act," to safeguard the rights and interests of data subjects, and to mitigate the possible impact of any infringement of the privacy of personal information.

II. Scope

This Policy sets out the O-Bank personal information management system framework and the method of its implementation. It also explains the personal data protection policies that O-Bank employees are required to comply with, as well as the roles, authorities, and responsibilities that O-Bank employees are expected to discharge in the course of planning, implementing, and improving their personal information management work.

This Policy applies to all O-Bank personnel. The scope and types of personal Information defined in this Policy are personal Information that are actually collected either directly or indirectly by the various units for administrative purposes connected with the conduct of O-Bank's registered lines of business, or lines of business permitted by law, or lines of business incidental thereto.

III. Definitions

(A) Personal information management system

This is an operational risk-based system that is used to establish, implement, operate, oversee, inspect, maintain, and improve the management of personal information.

(B) All personnel

This term includes all of O-Bank's regular employees, temporary employees, and contractors (providers of outsourced services).

(C) Effectiveness benchmarks

These define how to measure the effectiveness of selected control measures in order to achieve O-Bank's personal information management objectives.

(D) Personal data breach

Use of personal data without the data subject's authorization constitutes a personal data breach, as does unforeseen use of personal data that has been improperly collected, accessed, or disclosed.

(E) Management-level personnel

The term "management-level personnel," as it applies to O-Bank's management of personal information, includes the Chairman, President, Chief Compliance Officer, Chief Internal Auditor, and the various department supervisors.

IV. Authorities and responsibilities

All O-Bank personnel are required to understand and properly comply with this Policy.

V. Content

The following items shall be complied with:

(A) Personal information management objectives

O-Bank's personal information management objectives are the following:

1. Act in compliance with Taiwanese legislation governing the protection of personal data, orders issued by the competent authority, the provisions of customer contracts, and professional duties;
2. Protect the personality rights of data subjects, and enable them to fully protect their personality rights;
3. Collect, process, and use personal information in a way that does not exceed the necessary scope of specific purposes, is honest and good-faith in manner, and has legitimate and reasonable connections with the purposes of collection;
4. Implement proper security measures for personal information files to ensure that O-Bank can fulfill the duty of care of a good administrator;
5. Determine an acceptable degree of personal information protection risk, and adopt response measures; and
6. Properly respond to and handle any personal information security incident that harms the interests of stakeholders.

(B) This Policy

1. This Policy is as follows:

- (1) O-Bank complies with Taiwan's personal data protection legislation.
- (2) O-Bank collects personal information only for specific purposes that are lawful, proper, and reasonable, and collects only such information as

is actually needed.

(3) O-Bank collects and processes personal information only for specific purposes that are lawful, proper, and reasonable, and collects only the minimum amount of needed data.

(4) O-Bank shall clearly inform data subjects how their personal information is to be used.

(5) O-Bank will ensure special protection when collecting data directly from minors.

(6) Customer information collected shall be processed appropriately and for relevant purposes.

(7) O-Bank processes personal information in a fair and lawful manner.

(8) O-Bank maintains a list of the types of personal information that it processes.

(9) O-Bank ensures the veracity of personal information, and updates it as necessary.

(10) Personal information already collected is retained either in accordance with the law, or for specific lawful purposes.

(11) O-Bank respects the rights that data subjects can exercise with respect to their personal information, including: any inquiry or request for a review of the personal information; any request to make duplications of the personal information; any request to supplement or correct the personal information; any request to discontinue collection, processing or use of personal information; and any request to process, use, or delete the personal information.

(12) O-Bank uses technology with an appropriate level of security to

protect the personal information that it collects, processes, and uses.

(13) O-Bank transmits personal information internationally only where it is reliably, appropriately, and fully protected.

(14) Where access to personal information is permissible under exceptional circumstances as set out in the "Personal Data Protection Act," O-Bank shall ensure the appropriateness and legality of such access.

(15) O-Bank shall establish and implement a personal information management system, and shall carry out ongoing system maintenance to ensure that its personal data protection policy is properly implemented, thereby ensuring the security of personal information files.

(16) O-Bank shall differentiate between internal and external stakeholders and the degree to which they take part in the governance and operation of the personal information management system.

(17) O-Bank shall clearly define the responsibilities and duties of each employee involved in operation of the personal information management system.

(18) O-Bank shall map out a contingency plan for handling theft, tampering, damage, destruction, leaks, or other incidents involving personal information.

(19) If the collection, processing, and use of personal information are outsourced, O-Bank shall properly supervise the service providers.

(20) O-Bank shall set up a contact window that data subjects can use to exercise rights concerning personal information, file complaints, or seek consultation.

(21) O-Bank shall maintain the records of processing personal data.

2. To familiarize the public with this Policy, O-Bank shall issue a "Personal Information Management Policy Statement."

(C) Personal information management organization

To protect and manage personal information, O-Bank shall specify the authorities and responsibilities of personnel in the personal information management system in order to implement and oversee the personal data protection system.

(D) Personal information management system

The O-Bank personal information management system employs the "Plan-Do-Check-Act (PDCA)" cycle, explained as follows:

1. Plan

Acting on the basis of its overarching strategy and objectives, O-Bank will set up a personal information management organization to control potential threats and vulnerabilities, and plan out risk assessment and security control mechanisms, in order to establish a personal information management system.

2. Do

Based on the results of assessments and planning, O-Bank will establish or revise proper personal information management mechanisms.

3. Check

O-Bank will oversee the implementation of its personal information management system operations, and inspect their effectiveness. This Policy will be carried out in tandem with the O-Bank internal audit system, and O-Bank will periodically conduct personal information

internal audits to ensure proper management of personal information.

4. Act

Based on check results and recommendations, O-Bank will implement corrective actions and preventive measures, and will improve and execute proper control mechanisms in order to keep the personal information management system operating.

(E) Effectiveness benchmarks

1. To ensure that personal information management objectives are achieved to an acceptable degree, O-Bank will adopt effectiveness benchmarks.

2. Effectiveness benchmarks shall measure the effectiveness of selected control measures and shall yield comparable and repeatable results regardless what control measures are assessed and when the measurements are made.

(F) Responsibilities of management-level personnel

For the purpose of establishing, implementing, operating, overseeing, inspecting, maintaining, and improving the O-Bank personal information management system operations, management-level personnel shall adopt and comply with the following:

1. Commitments made by management-level personnel

Management-level personnel shall make sure to complete the tasks listed below, and shall express their full support for the development and improvement of personal information management:

(1) Approve personal information management objectives and policies.

- (2) Confirm the establishment of effectiveness benchmarks.
- (3) Determine the personal information management roles and duties of management-level personnel.
- (4) Provide the resources needed for personal information management system operations.
- (5) Decide upon an acceptable level of risk.
- (6) Manage and inspect personal information management system operations.
- (7) Oversee, establish, and carry out the personal information management system in accordance with the requirements of this Policy.

2. Molding of an organizational culture

- (1) Confirm that all personnel possess the professional expertise needed for their work.
- (2) Assess the effectiveness of professional training and related measures.
- (3) Establish and maintain records pertaining to education and training, skills, experiences, and qualification.
- (4) Promote awareness of the importance of complying with this Policy and related laws and regulations, achieving effectiveness benchmarks, and effecting ongoing improvements.

(G) Inspection of personal information management system

Management-level personnel shall: (a) make sure to conduct evaluations or inspections of the personal information management system either

periodically or from time to time in order to examine whether regulatory objectives as well as control measures and procedures are in line with applicable standards, legislative provisions, and personal information management needs; and (b) effectively implement and maintain the system in the planned manner in order to continue enhancing the effectiveness of the personal information management system.

(H) Inspection by management-level personnel of the personal information management system

Management-level personnel shall manage and inspect the system, either periodically or when a material change takes place, in order to ensure the suitability, adequacy, and effectiveness of personal information management system operations.

(I) Ongoing improvement of the personal information management system

The organization shall make use of internal audit results, corrective and preventive measures, and inspections by management-level personnel to continue improving the effectiveness of the personal information management system.

(J) Policy guidance and reviews

This Policy shall be assessed at least once per year in order to: (a) reflect the latest developments in such areas as legislative action, information technology, and O-Bank's operations; and (b) ensure the effectiveness of personal information management system operations.

(K) Compliance with this Policy and the law

All personnel shall comply with this Policy, and violators shall be punished in accordance with applicable O-Bank rules. Where civil damages, criminal liability, or administrative sanctions are involved,

O-Bank may terminate the employment relationship and, depending on the circumstances, take legal action against the violator. An employee's duty to protect O-Bank's personal information shall survive the termination by both parties of the employment relationship.

VI. Office forms and attachments

To protect and manage personal information, O-Bank shall adopt and issue a " Personal Information Management Policy Statement."

VII. Authority to approve

This Policy, and any amendments hereto, shall take effect upon approval by the Board of Directors.

For any operations or audits that are to be conducted in connection with this Policy, either the Personal Information Management Committee shall be authorized to handle them, or rules governing their handling shall be adopted in accordance with O-Bank's table of delegation of responsibilities.