

## Privacy and Personal Data Protection Policy

Zhen Ding Technology Holding Limited and its subsidiaries (hereinafter collectively referred to as "Zhen Ding" or the "Company") highly respect and protect the privacy and personal data of the Company's employees, customers, suppliers, visitors of the company website, users of the Company's products or services, employees of the Company's corporate customers and suppliers, job applicants, visitors, investors, and shareholders. The Company established the "Privacy and Personal Data Protection Policy" (hereinafter referred to as the "Policy") according to the Personal Data Protection Act, Enforcement Rules of the Personal Data Protection Act, and other privacy and personal data protection regulations applicable to the country or region where Zhen Ding's business locations are located, in order to protect and manage private and personal data obtained by the Company (hereinafter referred to as "Personal Data").

The Company hereby declares and commits to managing personal data collection, processing, and use according to the Policy, ensuring the safety of Personal Data and protecting the Personal Data it uses from leakage and improper use. The Company requires suppliers, contractors, and external consultants to comply with the Policy, and jointly implements privacy and personal data protection.

### **I. Specific Situations and Channels that the Company Obtains Personal Data**

- (I) Information provided to the Company: The Company uses information provided by others to obtain the Personal Data of others (such as: contacting the Company via e-mail or telephone, providing business cards to the Company, or applying for a job at the Company).

- (II) Information obtained through direct contact: Personal data obtained by the Company by participating in meetings, events, and exhibitions, visiting sales personnel, or participating in other meetings.
- (III) Information obtained through cooperation: Personal Data obtained by the Company through R&D cooperation or serving as the Company's consultant.
- (IV) Information obtained through legal relationships: Personal Data obtained by the Company due to legal relationships (such as: when the Company provides services).
- (V) Information that was voluntarily disclosed: The Company obtains Personal Data through information that was voluntarily disclosed, including through social media (such as: publishing content related to the Company online and the Company obtains Personal Data through the social media).
- (VI) Website information: The Company obtains Personal Data by visiting company websites or using functions or resources on the company websites.
- (VII) Registered information: The Company obtains Personal Data when users register to use the Company's website, products, or services.
- (VIII) Third party content and information in advertisements: When interacting with contents or advertisements provided by a third party on a website (including plug-ins or cookies provided by the third party), the third party will provide relevant information to the Company.
- (IX) Information provided by a third party: The Company may collect or obtain Personal Data from the information provided by a third party. (For example, joint credit information institutions; law enforcement agencies, etc.)

## **II. Purpose of Collection, Processing, and Use and Legal Basis**

Under the premise of complying with the law, the Company's purpose and legal basis for collecting, processing, and using Personal Data including the following:

(I) Company operations: Providing, planning, and improving the Company's website, products, or services, finding issues with the Company's website, products, or services. Planning how to improve the Company's websites, products, and services. Developing new websites, products, and services and for the Company to implement other business management measures.

1. Personal data collection and processing necessary for the contract has been signed or will be signed with the Company.

2. Personal data processing by the Company for lawful interests when providing its website, products, or services (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).

3. Personal data processing with prior consent from the personal data owner (this is only applicable to when the personal data owner voluntarily consents, and not when the Company processes personal data to fulfill its legal obligations).

(II) Website maintenance: Operating and managing the Company's websites, products, and services; Providing website contents; Interacting through the Company's website, products, or services; Update notifications for the Company's websites, products, and services.

1. Personal data collection and processing necessary for the contract has been signed or will be signed with the Company.

2. Personal data processing by the Company for lawful interests when

providing its website, products, or services (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).

3. Personal data processing with prior consent from the personal data owner (this is only applicable to when the personal data owner voluntarily consents, and not when the Company processes information to fulfill its legal obligations).

(III) Communication and marketing: Using any method for communication (including through e-mail, text, social media, announcements, or face-to-face) and providing updates or other information of interest; Maintaining and updating contact information; Where prior consent must be obtained due to legal requirements, the Company will contact the Personal Data owner to obtain consent.

1. Personal data collection and processing necessary for the contract has been signed or will be signed with the Company.
2. Personal data processing by the Company for lawful interests when providing its website, products, or services (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).
3. Personal data processing with prior consent from the personal data owner (this is only applicable to when the personal data owner voluntarily consents, and not when the Company processes information to fulfill its legal obligations).

(IV) Information system management: Managing and operating the Company's

communications system, information system, and security system. Conducting inspections (including security inspections) and monitoring the systems above.

1. The Company processes personal data to fulfill its legal obligations.
2. Personal data processing by the Company for lawful interests when managing and maintaining communication and information systems (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).

(V) Supplier management

1. Personal data processing by the Company for lawful interests when managing information systems of the Company and suppliers (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).
2. Personal data processing with prior consent from the personal data owner (this is only applicable to when the personal data owner voluntarily consents, and not when the Company processes information to fulfill its legal obligations).

(VI) Opinion survey: Obtaining opinions on the Company's websites, products, or services.

1. Personal data processing by the Company for lawful interests when conducting opinion surveys, satisfaction surveys, and market surveys (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).
2. Personal data processing with prior consent from the personal data owner (this is only applicable to when the personal data owner voluntarily consents,

and not when the Company processes information to fulfill its legal obligations).

(VII) Safety management: Physical security of the Company's plants (including visitor records of the Company's plants; surveillance camera recordings; electronic security, including login records and entry/exit records).

1. The Company processes personal data to fulfill its legal obligations.
2. Personal data processing by the Company for lawful interests in physical and cyber security of plants (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).

(VIII) Case investigation: Cooperating with investigations, conducting investigations, and preventing violations of the Company's regulations and crimes in accordance with the law.

1. The Company processes personal data to fulfill its legal obligations.
2. Personal data processing by the Company for lawful interests when cooperating with investigations, conducting investigations, and preventing violations of the Company's regulations and crimes (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).

(IX) Compliance: Complying with the Company's legal obligations.

1. The Company processes personal data to fulfill its legal obligations.

(X) Fraud prevention: Cooperating with investigation and prevention of fraud.

1. The Company processes personal data to fulfill its legal obligations.
2. Personal data processing by the Company for lawful interests when

cooperating with investigations and preventing fraud cases (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).

(XI) Claiming, exercising, or defending legal rights: Managing legal rights; claiming facts and rights, including document collection, review, and submission, facts, evidence, and testimony, and exercising and defending legal rights and claims, including claims in formal legal proceedings.

1. The Company processes personal data to fulfill its legal obligations.
2. Personal data processing by the Company for lawful interests when claiming, exercising, or defending the Company's legal rights (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).
3. Information processing is necessary for establishing, exercising, or defending legal claims.

(XII) Recruitment and interview: Recruiting activities, recruitment advertisements, interviews, position suitability analysis, records of recruitment decisions, contents of employment contracts, and details of accepting employment contracts.

1. The Company processes personal data to fulfill its legal obligations (especially labor related laws).
2. Personal data processing by the Company for lawful interests during recruitment and interviews (however, the lawful interests shall not be placed above the interests, basic rights, and freedom of the personal data owner).
3. Personal data processing with prior consent from the personal data owner

(this is only applicable to when the personal data owner voluntarily consents, and not when the Company processes information to fulfill its legal obligations).

### **III. Use of Personal Data Obtained by the Company in Specific Situations and Channels**

#### **(I) The Company shall notify the Personal Data owner**

The Company may generate Personal Data, such as records of interactions with the Company or past interaction records, in specific situations. The Company may obtain Personal Data through its website, products, or services, including data obtained from different devices, and utilize the data. Unless applicable laws and regulations expressly state that notification is not necessary, the Company shall notify the Personal Data owner of the following matters:

1. The Personal Data collected, processed, and used
2. The specific purpose for collecting, processing, and using Personal Data
3. The Personal Data owner may accept or reject all or a part of the Company's requests (or recommendations) to collect, process, and use Personal Data for different purposes
4. If the Personal Data owner refuses to provide Personal Data or the Personal Data provided is incorrect or insufficient, the Company might not be able to provide the Personal Data owner with specific or complete information, feedback, or services.

#### **(II) General Personal Data collected, processed, and used:**

1. Personal information: Name, aliases, and photos.
2. Demographic information: Gender, date of birth/age, nationality, title, and



language.

3. Contact method: Address, mailing address, telephone number, e-mail, instant messaging app information, Internet instant messaging information, and social media information.
4. Expertise: Expertise, employment record, occupation and qualifications, work experience information, participation in meetings, information on conferences and exhibitions, business relationships with others or other companies, language ability, and other professional skills.
5. Consent to being recorded: Records of obtaining consent, time and date that consent was obtained, method of consent, and any related information (such as: the subject that gave consent).
6. Information related to the Company's website: The type of device used, operating system of the device, type of browser, browser settings, IP address, language settings, date and time connected to the website, user name, password, encrypted login information, data used, and combined statistics.
7. Employer information: When interacting with the Company as an employee of another company, the name, address, telephone number e-mail, and employer's e-mail.
8. Website contents and advertisement information: Contents of the Company's website and records of interactions with advertisements, records of advertisements and contents displayed, and records of interactions with the contents above (such as: mouse-trajectory, mouse click, or other activities) and records of any interactions with the touch

screen.

9. Views and opinions: Actively provides the Company with any views, opinions, or discloses views and opinions on the Company on social media.

**(III) Special Personal Data that is collected, processed, and used:**

The Company does not actively collect or process special Personal Data, i.e., medical records, healthcare, genes, sex life, health examinations, and criminal record, within the scope of routine operations. If it is necessary to collect or process special Personal Data due to lawful reasons, the Company will collect such data within the scope of the following purposes:

1. To comply with regulatory requirements: Within the scope of required or permitted by law, the Company may process special Personal Data (e.g. to fulfill the Company's legal reporting obligations).
2. To investigate or prevent crimes from occurring: The Company may process special Personal Data if it is necessary to investigate or prevent a crime from occurring (e.g. preventing fraud).
3. To claim, exercise, or protect legal rights: If it is necessary to claim, exercise, or protect legal rights, the Company may process special Personal Data.
4. Based on the consent of the Personal Data owner: After obtaining prior consent from the personal data owner in accordance with the law, the Company may process special personal data (this is only applicable to when the personal data owner voluntarily consents, and not when the Company processes special personal data to meet regulatory requirements or fulfill its legal obligations).

(IV) The collection, processing, and use of special Personal Data does not exceed

the scope necessary for specific purposes

The Company's collection, processing, and use of Personal Data may not exceed the scope necessary for the specific purpose, and shall ensure there is a legitimate and reasonable correlation between the collection, processing, and use of Personal Data with the specific purpose. The owner of Personal Data may request that all or a portion of collection, processing, or use for a specific purpose be suspended, or that the Personal Data collected, processed, and used by the Company be deleted or destroyed.

#### **IV. Compliance of Disclosures to a Third Party**

The Company will properly manage the Personal Data it collects, and prevent leakage, loss, and damage of Personal Data. Furthermore, Personal Data obtained from related personnel will not be provided to a third party or disclosed, unless it is within the scope authorized by related personnel in the written agreement signed with the Company. If the Company needs to provide Personal Data to a third party, the Company will first verify the identity of the third party, and must notify and obtain consent from the Personal Data owner, unless the law expressly states that the Company is not required to do so. The Company will disclose the minimum amount of Personal Data necessary, and will require the third party to properly manage Personal Data. The Personal Data may not be used for purposes other than the specific purpose for processing or use, and may not be copied and retained, purchased/sold, leased, used, or disclosed in any form.

#### **V. Personal Data Retention**

The Company shall not retain Personal Data longer than the reasonable period necessary for the specific purpose, and shall not exceed five years in principle. The

Company may not continue to retain Personal Data, unless it is expressly stated in the law, necessary to perform duties or for business, or approved by the Personal Data owner. However, when the necessity for Personal Data collection, processing, and use no longer exists, the specific purpose is no longer legitimate and reasonable, or the laws and regulations on Personal Data are no longer applicable, the Company will suspend the collection, processing, use of Personal Data and delete or destroy the Personal Data.

## **VI. Information Security Measures**

The Company believes that it is very important to protect information assets (including Personal Data) in information systems and databases from various threats. Therefore, the Company will ensure the consistency, availability, and completeness of information assets and properly protect information assets through the following methods:

1. Set up a hardware firewall, intrusion detection system, and vulnerability scanning to block unknown attacks from the Internet, in order to protect the security and completeness of the Company's information assets.
2. Set up an anti-virus system to prevent viruses and provide users with a safe network environment.
3. Regularly and irregularly backup data in systems and databases, in order to restore the system within the shortest time possible when an unforeseeable disaster occurs, so that it can continue to be used by users.
4. Regularly and irregularly update operating systems or apps released by developers, so as to ensure the system can defend against any type of attack and minimize the probability of being attacked.

During the retention period of Personal Data, the Company monitors Personal Data access, processing, transmission, retention, access rights, and information security of transmission and storage equipment, in order to ensure the safety of Personal Data by preventing damage, destruction, theft, leakage, and unauthorized access, copy, use, and tampering.

## **VII. Cross-border Transfer**

The Company's affiliated enterprises in different countries and regions may engage in cross-border transfer and use of Personal Data within the scope necessary for a specific purpose for collecting, processing, and using Personal Data. When engaging in cross-border transfer and use of Personal Data, the Company complies with the Policy and the applicable local laws and regulations on privacy and personal data protection during cross-border transfer and use.

## **VIII. Legal Rights of Personal Data Owners**

- (1) The owner of Personal Data collected, processed, and used by the Company shall enjoy the following legal rights: Request access, copy, supplement, or correct incomplete or incorrect Personal Data; suspend collection, processing, and use; delete or destroy Personal Data displayed on or stored on the Company's internal or external website, files, or other storage equipment; request the transfer of Personal Data to a third party information manager in electronic form or a form easily readable by machine, provided that it is technically feasible; file a complaint regarding a violation of personal data protection with the competent authority of personal data protection where the Personal Data owner resides or the Personal Data is used.

- (II) When the Personal Data owner hopes inquire or modify his/her Personal Data or files a complaint or requests to negotiate, he/she may contact the Company's contact person and responsible personnel will respond within a reasonable scope. The Company will continue to regularly review and improve the abovementioned work in an organized manner while abiding by laws and regulations of the government, industry, and Company regarding Personal Data use.

**IX. Zhen Ding attaches great importance to privacy and personal data protection**

- (I) Privacy and personal data protection are an aspect of the Company's internal controls and risk management. The Company audits its risk assessment and internal controls each year, and also irregularly audits the compliance of suppliers to ensure that operations comply with the Policy and applicable laws and regulations on privacy and personal data protection.
- (II) The Company communicates laws and regulations related to privacy and personal data protection with all employees. Since the Company adopts a zero tolerance policy for violations of privacy and personal data protection, the Company will review and improve management measures for any violations and punish related personnel according to applicable regulations.
- (III) Company's suppliers and their employees, contracted personnel and contractors' personnel shall follow the Policy and relevant information security regulations. They are responsible for protecting the company's information assets from unauthorized access, modification, destruction, or improper disclosure in accordance with their work responsibilities. The Policy clearly

states the Company's emphasis on the privacy rights and personal data protection, and Company's suppliers and their employees, contracted personnel and contractors' personnel shall fully understand and implement the Policy to maintain the security of our Company's information.

(IV) If the Company's employees, other companies, or natural persons have any questions regarding the Policy or other matters related to privacy or personal data protection, they may refer to the information below and contact the Company's responsible unit:

Chairman's Office

[zdt-report@zdtco.com](mailto:zdt-report@zdtco.com)

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