

Privacy & Personal Data Protection Policy of Sinyi Group

I. Policy Purpose

Sinyi Realty Inc. and its affiliated enterprises (hereinafter referred to as "the Group") have established this **Privacy & Personal Data Protection Policy** to fulfill their responsibility for personal data protection, safeguard the privacy rights and interests of customers, employees, and other stakeholders, and comply with the **Personal Data Protection Act (PDPA)** and relevant regulations.

The purpose of this Policy is to establish a secure and managerial mechanism for personal data, ensuring the **legality, accuracy, and security** of data collection, processing, and utilization, thereby strengthening corporate governance and sustainable operation through institutionalized management.

The term "the Group" in this Policy includes Sinyi Realty Inc., its subsidiaries, affiliated enterprises, and enterprises over which it has direct or indirect substantive control globally.

II. Scope of Application

1. Applicable Subjects

This Policy applies to:

- (1) All customers, including but not limited to potential customers and parties to real estate transactions.
- (2) Employees, dispatched personnel, student workers, consultants, contractors, and suppliers.
- (3) Any natural person who provides personal data due to business dealings.

2. Scope of Coverage

This Policy covers the Group's **websites, mobile applications, customer service systems, membership services, marketing activities, real estate brokerage, and construction project services**. Any activity involving the collection, processing, and utilization of personal data shall be conducted in accordance with this Policy.

III. Personal Data Protection Principles

The Group manages personal data based on the following principles:

1. **Principle of Lawfulness and Fairness:** Data is collected under clearly defined purposes and a legitimate basis.
2. **Principle of Purpose Limitation:** Data is used only within the necessary scope of the purposes for which it was collected.
3. **Principle of Data Minimization:** Only the minimum data necessary to achieve the purpose is collected.
4. **Principle of Accuracy and Timely Update:** Ensuring data is accurate, timely, and complete.
5. **Principle of Security:** Adopting appropriate technical and organizational measures to prevent loss, alteration, leakage, or unauthorized access.
6. **Principle of Data Subject Rights Protection:** Respecting and safeguarding the data subject's legal right to exercise their rights.
7. **Principle of Transparency and Disclosure:** This Policy shall be disclosed on the Group's websites and the Market Observation Post System for public review.
8. **Personal Participation and Access:** Respecting the data subject's right to exercise control over their personal data and privacy, including the rights to inquire or request review, request a copy, request supplement or correction, request the cessation of collection, processing, or utilization, and request deletion, as fully stipulated by law.
9. **Accountability:** Ensuring the accountability of the aforementioned principles.
10. **Information and Communication Security:** Considering the requirements of information and communication security.

IV. Responsible Units and Authority

Unit / Position	Main Responsibility
Board of Directors	Approves the Policy and supervises the Group's effectiveness in personal data protection.
Corporate Ethics and Sustainability Committee	Regularly reviews the implementation of the Policy and information security risks.

Unit / Position	Main Responsibility
Digital Intelligence Dept. / Customer Service Dept.	Establishes and maintains the personal data protection system and technical measures.
Legal Affairs Office	Reviews legal compliance, contract clauses, and risk management.
Heads of Business Units	Implements departmental operating procedures and employee education and training.

Contact Information:

Legal Affairs Office, Sinyi Realty Inc.

Tel: (02)2755-7666 E-mail: s193799@sinyi.com.tw

V. Data Collection and Utilization

1. **Purposes of Collection:** Based on purposes such as contract fulfillment, legal compliance, customer service, membership management, real estate transactions, construction project promotion, marketing activities, and internal company management.
2. **Categories of Collection:** Including name, contact information, National ID number, residential address, financial account numbers, transaction records, online identifiers, image data, etc.
3. **Scope of Utilization:** Used within the purposes and duration of collection, within Taiwan and necessary external service systems abroad.
4. **Retention Period:** Retained according to business needs or legal requirements, and deleted or anonymized when the period expires or retention is no longer necessary.
5. **Outsourcing to Third Parties:** If processing is outsourced, a confidentiality and security maintenance agreement will be signed with the entrusted party, and their compliance with legal regulations will be supervised.

VI. Data Subject Rights

The data subject may exercise the following rights pursuant to Article 3 of the **Personal Data Protection Act**:

1. The right to **inquire or request review**.
2. The right to **request a copy**.
3. The right to **request supplement or correction**.
4. The right to **request the cessation of collection, processing, or utilization**.
5. The right to **request deletion**.

Application Method: Applications can be submitted via the email address **cs@sinyi.com.tw** or by written letter to the Sinyi Realty Customer Service Department. The receiving unit shall reply with the processing result within thirty (30) days. If a special circumstance requires an extension of the reply period, the reason for the extension shall be communicated to the data subject in advance.

VII. Data Security Management Measures

1. Establishment of information security policies and access control systems.
2. Use of firewalls, intrusion detection systems, and encryption technologies to protect data.
3. Regular system vulnerability scanning, penetration testing, and information security audits.
4. Establishment of off-site backup and data recovery mechanisms.
5. Conducting information security incident notification and response drills.
6. Adopting physical security controls and document destruction procedures for devices and documents containing sensitive data.

VIII. Employee Education and Training

To enhance employee awareness of personal data protection, the Group shall conduct regular internal courses, seminars, case discussions, and other activities annually. All personnel within each unit must participate to ensure their familiarity with the provisions of these guidelines and relevant laws and regulations.

IX. Policy Disclosure and Implementation Status

1. The implementation status of this Policy shall be appropriately disclosed on the Group's websites, Sustainability Reports, or Annual Reports.
2. The content disclosed annually includes:
 - Updated Policy versions and key revisions.

- Statistics on employee training hours and number of participants.
- Information security incident notifications and improvement measures.

X. Supplementary Provisions

1. This Policy shall be reviewed and assessed periodically in conjunction with changes in government laws, environment, business, and technology. Any amendments must be approved by the **Board of Directors** and announced for implementation.
2. The Group reserves the right to modify this Protection Policy at any time. Modifications will be updated on this website and will take effect from the date of update without separate notice.