

公司客戶與個人資料保護政策

一、政策目的

本政策旨在規範本公司於業務活動中，對個人資料及客戶資料之蒐集、處理、利用與保護方式，建立一致之管理原則，以確保資料安全、維護當事人及客戶權益，並符合相關法令、契約約定及本公司內部控管與風險管理之要求。

二、保護標的說明

- 本政策之保護標的分為以下兩類：

一、 個人資料

指依個人資料保護法規定，得以直接或間接方式識別特定自然人之資料，包括但不限於姓名、聯絡方式、身分識別資訊、電子郵件、交易紀錄等。個人資料之蒐集、處理及利用，悉依相關個人資料保護法令及本政策辦理。

二、 客戶資料

指本公司於提供服務、執行專案或合作過程中，基於業務關係所取得之非公開客戶相關資料，不以個人資料為限，包括但不限於：

- 法人或組織基本資料
- 合約、報價、專案文件
- 營運、財務、技術、系統或策略資訊
- 客戶提供之文件、數據、成果或其他商業資訊

客戶資料之保護，除法令另有規定外，並依契約約定及本政策所定之保密與安全原則辦理；如涉及營業秘密者，另依相關法令及契約約定處理。

三、資料蒐集原則

- 一、資料之蒐集應基於合法、正當及必要之特定目的，且不得逾越業務所需之合理範圍。
- 二、蒐集內容以達成業務目的所必要者為限。
- 三、涉及個人資料者，本公司將依法告知蒐集目的、資料類別、利用期間、地區、對象及當事人依法得行使之權利。

四、資料利用原則

- 一、個人資料僅於法令允許及原蒐集目的範圍內利用；如有符合法令所定目的外利用之情形者，依相關規定辦理。
- 二、客戶資料僅得用於履行服務內容、契約約定或雙方同意之用途。
- 三、非經當事人或客戶同意，或法令另有規定或契約另有約定者，不得對外揭露、提供或移轉相關資料。

五、資料保護措施

本公司依資料性質、敏感程度及實際風險，採取合理且適當之技術及組織性安全措施，以防止資料遭未經授權之存取、洩漏、竄改或毀損，包括但不限於：

- 存取權限控管與身分驗證機制
- 資料加密、備份及安全防護措施
- 員工保密義務之規範與教育訓練
- 資訊系統及文件管理制度

本公司並指定相關單位或人員，負責本政策之推動、維護及執行。

六、資料保存與刪除

- 一、個人資料依蒐集目的之存續期間或法令規定之保存期限保存。
- 二、客戶資料依契約約定、業務需要或相關法令規定之期間保存。
- 三、保存期限屆滿或蒐集、利用目的消失後，資料將依法或依契約約定予以刪除、銷毀或匿名化處理，並確保其無法再識別特定對象。

七、權利與請求

- 一、個人資料當事人得依相關法令規定，行使查詢、閱覽、製給複製本、補充或更正、停止蒐集、處理、利用或刪除等權利。
- 二、客戶得依契約約定，請求說明其資料之使用、保護或返還方式。
- 三、前述權利行使之申請方式及聯絡窗口，依本公司另行提供之管道辦理。

八、第三方與委外管理

因業務需要委託第三方處理個人資料或客戶資料時，本公司將：

- 要求受託方遵守保密及資料保護相關法令與義務
- 於契約中明定資料保護、保密責任及違反時之處理方式
- 採取合理之監督管理措施，以確保其符合本政策之要求

九、政策修訂

本公司得因法令變更、主管機關要求或營運需要修訂本政策，修訂後內容經本公司核准後實施，並以適當方式公告或通知相關對象。

Corporate Customer and Personal Data Protection Policy

1. Purpose of the Policy

This Policy is established to regulate the Company's collection, processing, use, and protection of personal data and customer data in the course of its business activities, to establish consistent management principles, ensure data security, safeguard the rights and interests of data subjects and customers, and ensure compliance with applicable laws and regulations, contractual obligations, and the Company's internal control and risk management requirements.

2. Scope of Protection

The objects protected under this Policy are classified into the following two categories:

1. Personal Data

"Personal Data" refers to data that may directly or indirectly identify a specific natural person, as defined under applicable personal data protection laws, including but not limited to name, contact information, identification information, email address, and transaction records. The collection, processing, and use of personal data shall be conducted in accordance with applicable personal data protection laws and regulations and this Policy.

2. Customer Data

“Customer Data” refers to non-public information relating to customers obtained by the Company in the course of providing services, executing projects, or engaging in cooperation based on business relationships, and is not limited to personal data, including but not limited to:

- Basic information of legal entities or organizations
- Contracts, quotations, and project documents
- Operational, financial, technical, system, or strategic information
- Documents, data, deliverables, or other commercial information provided by customers

Unless otherwise provided by law, the protection of customer data shall be governed by the confidentiality and security principles set forth in contractual agreements and this Policy. Where such data constitutes trade secrets, it shall be handled in accordance with applicable laws and contractual provisions.

3. Principles of Data Collection

1. Data shall be collected for lawful, legitimate, and necessary specific purposes and shall not exceed the reasonable scope required for business needs.
 2. The scope of data collected shall be limited to what is necessary to achieve the stated business purposes.
 3. Where personal data is involved, the Company shall, in accordance with applicable laws, inform the data subject of the purpose of collection, categories of data, period of use, geographical scope, recipients, and the rights exercisable by the data subject under the law.
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4. Principles of Data Use

1. Personal data shall be used only within the scope permitted by law and consistent with the original purpose of collection. Any use beyond the original purpose shall be conducted in accordance with applicable legal requirements.
 2. Customer data shall be used solely for the performance of services, fulfillment of contractual obligations, or other purposes agreed upon by both parties.
 3. Without the consent of the data subject or customer, or unless otherwise provided by law or contract, relevant data shall not be disclosed, provided, or transferred to any third party.
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5. Data Protection Measures

Based on the nature, sensitivity, and actual risks of the data, the Company shall adopt reasonable and appropriate technical and organizational security measures to prevent unauthorized access, disclosure, alteration, or destruction of data, including but not limited to:

- Access control and identity authentication mechanisms
- Data encryption, backup, and security protection measures
- Employee confidentiality obligations and related education and training
- Information system and document management controls

The Company shall designate relevant departments or personnel responsible for the implementation, maintenance, and enforcement of this Policy.

6. Data Retention and Deletion

1. Personal data shall be retained for the duration necessary to fulfill the purpose of collection or for the retention period required by applicable laws and regulations.
2. Customer data shall be retained in accordance with contractual agreements, business needs, or applicable legal requirements.
3. Upon expiration of the retention period or when the purpose of collection or use no longer exists, the data shall be deleted, destroyed, or anonymized in accordance with law or contractual agreements, and measures shall be taken to ensure that the data can no longer be used to identify specific individuals or entities.

7. Rights and Requests

1. Data subjects of personal data may, in accordance with applicable laws and regulations, exercise their rights to inquire, access, obtain copies, supplement or correct data, request cessation of collection, processing or use, or request deletion.
 2. Customer may, in accordance with contractual agreements, request explanations regarding the use, protection, or return of their data.
 3. Applications for exercising the above rights and the relevant contact channels shall be handled through the methods separately provided by the Company.
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8. Third Parties and Outsourcing Management

Where the Company engages third parties to process personal data or customer data due to business needs, the Company shall:

- Require such entrusted parties to comply with confidentiality and data protection laws and obligations
 - Clearly stipulate data protection responsibilities, confidentiality obligations, and consequences of breach in relevant contracts
 - Implement reasonable supervisory and management measures to ensure compliance with this Policy
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9. Policy Amendments

The Company may revise this Policy in response to changes in laws and regulations, requirements of competent authorities, or operational needs. Any revisions shall be implemented upon approval by the Company and announced or notified to relevant parties through appropriate means.
