

PERSONAL DATA PROTECTION REGULATIONS

SAGAWA EXPRESS (H.K.) CO., LTD.

PERSONAL DATA PROTECTION REGULATIONS

GENERAL

The objective of this Personal Data Protection Regulations (the “**Regulations**”) is to protect the rights and privacy of individuals’ Personal Data (defined below), by determination of standards, rights, duties, and measures for the protection of Personal Data possessed by Sagawa Express (H.K.) Co., Ltd. (the “**Company**”), and ensure that the Company fully complies with The Personal Data (Privacy) Ordinance (Cap.486) (the “**PDPO**”), and where appropriate other applicable laws and regulations in Hong Kong (collectively, the “**Applicable Law**”).

This Regulations applies to all employees of the Company (plural as “**Employees**”, and singular as “**Employee**”). Any breach of the Applicable Law or this Regulations will be taken very seriously, and disciplinary action may be taken.

This Regulations shall be effective as of August 1st, 2023 and is subject to further changes or revisions (which shall be notified to an Employee). The Company shall continue to review the effectiveness of this Regulations from time to time as and when necessary.

This Regulations works in tandem with the Privacy Policy for Employees and the Employee Consent Form which the Employee has signed. Please study this Regulations and both documents carefully to understand how the Company use Employees Personal Data.

1. KEY DEFINITIONS

“**Personal Data**” refers to any data about an individual which can be used to identify such individual (“**Data Subject**”), whether from that data alone or in combination with other information. This includes any expression of opinion about an individual and intentions towards an individual. This also includes personal data held visually, such as photographs and video clips (including CCTV) as well as audio recordings.

“**Data Subject**” refers to the individual who is the subject of the personal data. For the purposes of this Regulation, the Employee (plural as Employees) is the Data Subject.

“**Data User**” is a person who, either alone or jointly with other persons, controls collection, holding, processing or use of personal data. For the purposes of this Regulation, the Company is the Data User.

“**Data Processor**” is a person who processes personal data on behalf of another person (a data user), instead of for his/her own purpose(s).

2. DATA PROTECTION PRINCIPLES

2.1. Collection of Personal Data

The Company may, directly or indirectly, collect your personal data from the following sources:

- (1) Information that you or your representative directly provided to the Company;
- (2) Personal data received from affiliates of the Company;
- (3) Application, website, social media, and/or other public relation media you use in order to contact the Company;
- (4) Personal data received from vendor or business partner of the Company such as

- recruitment agency; or
(5) Any reliable public sources.

2.2. Types of Personal Data Collected

The Company shall only collect personal data that are necessary and adequate (but not excessive) for a lawful purpose directly related to a function or activity. Depending on purposes of use and requirement of the operatives in processing personal data, the Company may collect various types of Employee's Personal Data including:

- (1) Identification information such as name-surname, name prefix, date of birth, nationality, identification number, taxpayer identification number, fax number telephone number, e-mail, social media account (such as Line ID), address, copy of identification card, copy of driver license, copy of car registration, copy of household registration, copy of passport, photo, voice, signature, picture, and video;
- (2) Personal characteristics such as a copy of the professional license, copy of license (i.e., international transportation license), and job position;
- (3) Financial information such as bank account, transaction information, financial credit information, withholding tax information, payment method, and other payment details; and
- (4) Personal characteristics such as blood type, religion, health check report, medical records; and
- (5) Criminal record information such results of background check from Hong Kong Police Force.
- (6) Other information such as vehicle registration number, Personal Data that the data subject provides to the Company when contacting us such as interest and type of service, communication with the Company through social media and other channels.

2.3. Purposes of use and disclosure

The Company will process Employee's personal data to: (i) perform contractual obligations as a party to the contract, (ii) comply with legal obligations, or (iii) for the legitimate interest. Personal Data which the Company collects from an Employee may be collected, used and/or disclosed for the following purposes (collectively, the "**Purposes**"):

- (1) To process recruitment including application and background review;
- (2) To conduct performance review for performance appraisal, promotion and career development;
- (3) To monitor personnel to maintain labour management within the Company, including headcounts and Employee's database;
- (4) To administer Employee's employment;
- (5) To facilitate Employees with personnel system development including arranging secondment, training and skill surveys;
- (6) To manage job and position deployment and transfer;
- (7) To administer payroll and tax reporting;
- (8) To administer compensation and benefits and welfare schemes for Employees;
- (9) To arrange and manage Employee's benefits and welfare including to purchase coverage of insurance policies for Employees;
- (10) To submit to the proper authority, including facilitating the application for governmental documents including visa and work permit;
- (11) To make disclosures of Employee's information as permitted or required by Applicable Law, such as disclosures in connection with investigations as required by the Government, law enforcement agencies, statutory bodies etc., administration of immigration and insurance matters, to enforce the Company's rights and/or fulfil its

- contractual or statutory obligations;
- (12) To maintain security on data protection; and
 - (13) To report and share Employee's information with our Japanese head office.

In the case where the Company appoints third party service provider(s) (whether within or outside Hong Kong) to process your Personal Data, the Company shall adopt contractual or other means to prevent any Personal Data transferred to the third party service provider(s) from being kept longer than is necessary for processing of the data.

The Company will not disclose or permit the disclosure or make available your Personal Data other than in accordance with the Purposes unless you have given a prior written consent to the Company or the Applicable Law allows the Company to do so without obtaining your consent.

If you could not share Personal Data that are necessary for the Company to process Personal Data based on the ground of contractual obligations, or legal obligations, the Company will not be able to perform its contractual obligations with such subject matter nor able to comply with legal obligations.

The Company will process Personal Data in strict compliance with Applicable Law. In case where you have given a written consent to any data processing activity, you may withdraw your consent at any time by giving the Company a notice in writing.

2.4. Data Sharing and Disclosure

- (1) The Company will not disclose Employee's Personal Data without Employee's consent. This is unless the disclosure has appropriate legal basis, such as:
 - (i) Is required based on the applicable laws and/or regulations;
 - (ii) Is necessary to respond to an emergency that threatens the life, health or safety of the Employee or another individual which cannot be obtained in a timely way, provided that the Company shall, in reasonably timely manner, notify the Employee of the disclosure and the purposes of the disclosure;
 - (iii) Is necessary for any investigation or proceedings; and
 - (iv) Is necessary to verify Employee's personal particulars and process payment requests in relation to the provision of the services which Employee may be entitled to or may have requested for.
- (2) In order to conduct our business operations more smoothly, the Company may also be disclosing the Personal Data which have provided to us to our third party service providers, agents, and/or our affiliates or related corporations, whether within or outside Hong Kong, or to relevant government authorities or law enforcement agencies when there is legal obligation or legitimate interest to do so, for one or more of the above-stated Purposes. This is because such third-party service providers, agents and/or affiliates or related corporations, or relevant government authorities or law enforcement agencies would be processing Employee's Personal Data on our behalf for one or more of the above-stated Purposes. The Company will rely on the same basis as notified or consented by you for these transfer and processing activities. In such cases, the Company will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Applicable Law and the Company's standards.
- (3) In all other instances of disclosure of Personal data to third parties with appropriate legal basis, including express consent from Employees, insofar as is reasonably practicable the Company will endeavor to provide adequate supervision over the handling and administration of Personal Data by such third parties, as well as to provide for adequate forms of protection over such Personal Data.

3. RULES AND REGULATIONS ON DATA HANDLING

For the purpose of complying with the Applicable Law in every aspect of daily operations, the Employees of the Company must strictly comply with the Internal Rules for Handling of Personal Data specified in the Annex of this Regulations. The Principles apply to the collection, use, disclosure, storage, erasure, and transfer of Personal Data relating to the operations of the Company, unless this Regulations or any laws expressly specified otherwise.

4. DATA PROTECTION OFFICER

4.1. The Human Resources Manager or the appointed in-charge shall be the Company's Data Protection Officer ("DPO"). The DPO will be responsible for any issues concerning the compliance with the Applicable Law, including any day-to-day matters relating to the handling of Personal Data by the Company, and will report to the Managing Director, or in his absence an appointed personnel, on matters relating to any non-compliance of this Regulations or the Applicable Law.

4.2. In case of any concerns regarding this Regulations or any other issues related to Personal Data handling, please contact the DPO at the below contact information:

Position: Corporate Finance & Administration Division, Division Manager
Address: Units 801-803, 8/F., Tins Enterprises Centre, 777 Lai Chi Kok Road
Kowloon, Hong Kong SAR, China
Tel: +852-2409-9128
Email: shk-hr@sgh-global.com

5. RESPONSIBILITY OF ALL EMPLOYEES

5.1. All Employees shall be responsible for:

- (1) Ensuring that any information that have been provided to the Company in connection with their employment is accurate and up to date;
- (2) Informing the Company of any changes in the information provided, such as changes of address, either at the time it occurs or within a reasonably practicable time thereafter. The Company will not be held responsible for any inaccuracies or errors of such information unless the Employee informs the Company of such changes;
- (3) If and when, as part of their responsibilities, Employee needs to process the Personal Data in their performance of works, they must strictly comply with this Regulations.
- (4) If and when, as part of their responsibilities, Employee needs to process Personal Data for a specific purpose other than the purposes set out in any privacy notices issued by the Company, Employee will be required to seek prior written approval from the DPO.
- (5) Any Employees who fail to comply with this Regulations may be subject to disciplinary actions, which may result in termination of employment. In addition, the Company is entitled to claim against such persons any loss or damage to the Company as a result of such non-compliance.

6. RETENTION OF PERSONAL DATA

6.1. The Company retains Personal Data of Employees and in-house personnel for a period of time after they leave or resign. Apart from legal purposes, there are other purposes such as to provide references, or for financial reasons including relating to any statutory fund payment and/or taxation.

- 6.2. Employee's Personal Data will be retained for period(s) as are reasonable and necessary to meet the Company's legal and/or business purposes, and the Company will cease to retain Employee's Personal Data as soon as it is reasonably practicable to assume that the purpose for collection of such Personal Data is no longer being served by such retention, and such retention is no longer necessary for legal and/or business purposes. Our current Regulations is to retain certain Employee's Personal Data for up to seven (7) years after Employees' cessation of employment, subject to the applicable anonymization procedures and at all times in accordance with the Company's document retention and erasure practice, and the Applicable Law.

7. CONCLUSION

- 7.1. Any deliberate breach of this Regulations may lead to disciplinary action or even criminal prosecution. Any questions or concerns about the interpretation or operation of this Regulations should be taken up with the appropriate designated DPO.
- 7.2. In case there is a material change in the procedure relating to personal data protection, the Company shall amend and revise this Regulations whenever necessary and shall disclose it to ensure that the Employees have knowledge of the method that the Company collects, uses, handles, discloses, and protects the data.

ANNEX

Internal Rules for Handling of Personal Data

Pursuant to Clause 3 of this Regulations, this Internal Rules for Handling of Personal Data formed part of the Regulations with the details as follows.

1. **Fairness and Legality:** In the processing of Personal Data, the rights of Data Subjects are protected under the Applicable Law. The Company will only collect personal data for a lawful purpose and the data collected should be necessary and adequate but not excessive for such purpose. The means of collection should also be lawful and fair. The processing of Personal Data should be carried out only for those activities that have legal basis according to the Applicable Law which may include the following:

- (1) **Contractual Obligation Basis:** The processing of Personal Data)a) for entering into contracts)the processing of Personal Data before entering into contracts(, for example, checking employment records, knowledge, the capabilities of job applicants before employment, etc. and)b) the processing of Personal Data that is reasonably necessary for **the performance of contracts**, for example, the use of the bank account numbers of Employees for the payment of salaries under employment contracts, etc.
- (2) **Legal Obligation Basis:** This applies to cases where data processing is necessary for the performance of duties as required by law, for example, submitting withholding tax to the Revenue Department, or the registration of employees with the Department of Labor Protection and Welfare, etc. In this regard, the types of data and the scope of processing may be carried out only to the extent that is necessary for the processing activities as specified by law.
- (3) **Legitimate Interests Basis:** This applies to cases where data processing is necessary for any undertaking regarding the legitimate interests of the Company, for example, the recording of CCTV footage for security purposes, or the use of Personal Data for the interest of others such as the disclosure of Personal Data to the parent company for the Company's internal management, etc. In processing of Personal Data on legitimate interest basis, the Company must take into consideration the legitimate interests that the Company will receive in comparison with the rights and interests of Data Subjects, so that such processing shall not breach or prejudice the basic rights and freedom of Data Subjects.

Accordingly, the legitimate interests basis may not be carried out in the event that there is clear and unequivocal evidence that such benefits are less important than the basic rights regarding the Personal Data of Data Subjects. Therefore, if the Employees are not certain whether they should use the basis of legitimate interest, they should refer the matter directly to the DPO prior to any processing of Personal Data.

- (4) **Vital Interests Basis:** This refers to the processing of Personal Data that is reasonably necessary for protecting the vital interests of Data Subjects, or of another person, for the protection of the health and life of Data Subjects when the Data Subjects are not in a condition to give consent. The vital interests basis cannot be carried out if the Data Subjects are in a condition to give consent, or if there is another way to protect the life, body, and health of the Data Subjects or another person without being required to process the data.
- (5) **Public Task Basis:** This refers to the processing of Personal Data that is necessary for the performance of duties in carrying out any activity in the public interest, or for the performance of duties delegated by the government to the Company.

- (6) **Historical Documents, Public Archives, Research, or Statistics Basis:** This refers to the processing of Personal Data that is necessary to achieve the purposes of a particular and necessary matter. In this regard, in applying basis (6), the basis for the processing of Personal Data under (1) – (5) above)any one case(must apply before basis (6) can apply.
- (7) **Consent Basis:** The processing of Personal Data that does not fall into any other basis of processing) the basis of the processing of Personal Data under basis (1) – (6) may not be applicable(, provided that the request of consent shall not be a condition for providing services or the performance of contracts, for example, in the case that the Company wishes to use customer data for marketing activities, or a satisfaction survey, etc.)these activities are considered to be in the interest of the Company(. In general, the basis for the processing of Personal Data under (1)-(6) may not be applied to the use of data for marketing activities or a satisfaction survey. If the Data Subject does not give the Company consent to use his or her Personal Data in marketing activities, the Company cannot refuse to enter into transactions with the Data Subject or refuse to carry out activities with the Data Subject.

In addition, the bases for the processing of Personal Data as stated above are the bases that the Employee will use to processing data under the Applicable Law. If Employees have any questions concerning the basis of the processing of Personal Data, they are advised to direct any questions to the DPO.

- 2. **Limitations of Processing:** The processing of Personal Data can be carried out only in accordance with the purposes at the time of the collection of which the Data Subject has given his/her consent, or for such new purposes which the Data Subject has subsequently been informed.

3. Notification of Processing

- (1) **Principles for notification of data processing:** The Company shall notify Data Subjects of every basis for the processing of Personal Data and the purposes of the data collection, use, and disclosure, including the period of data retention, the data disclosure to third parties, the rights of Data Subjects, and the contact details of the Company relating to the protection of Personal Data. In this regard, the Company has issued the Privacy Notice For Client)which is a type of notification which is made to the general public through the Company’s website(. In case there are any new activities that are not mentioned in the Privacy Notice For Client, or on which data will be used for other purposes not mentioned in the Privacy Notice For Client, the Data Subject must on every occasion be notified first of the use of such Personal Data. Accordingly, Employees are advised to inform the DPO in order to keep the Privacy Notice For Client updated and incorporate new activities as and when appropriate.

In addition, notifications shall be given to the Data Subjects through every usual channel by which the Company habitually contacts the Data Subjects, which may be in the form of printed materials, electronic means, or by verbal notification if necessary.

- (2) **Notification of new purposes:** In the case that the Company is required to process Personal Data to achieve a new purpose that is different from the purposes that the Data Subject have been notified of, the Company shall notify the new purpose to the Data Subject [within a reasonably practicable time period] through the same channel by which it previously notified the Data Subject, and the Company will enclose an updated Privacy Notice For Client.

If the new purpose relates to a purpose which the Data Subject has already been duly

notified of and the Data Subject can reasonably expect such processing, the DPO shall record the details of the processing activities as evidence.

- (3) **Notifying the Data Subject of data obtained from other sources:** In the case that the Company collects data from sources other than directly from the Data Subject, the Company shall notify the Data Subject before processing such data, unless it falls under any of the following cases in which it is not necessary for the Company to notify the Data Subject of the purpose and details:
- (a) If the notification to the Data Subject is not possible due to certain circumstance resulting in the Company being unable to notify the Data Subject (e.g., no contact details of the Data Subject are available); or
 - (b) If the notification to the Data Subject will make the purpose of processing materially less effective (e.g., for inspection or judicial proceedings); or
 - (c) If notifying the purpose to the Data Subject will cause excessive obstacles for the Company (e.g., the purpose involves a large number of Data Subjects and notification of such will incur excessive costs or will take excessive time).

4. Rights of Data Subjects: The Company shall ensure that Data Subjects are able to exercise their rights in relation to their Personal Data as follows:

- (1) **The right to withdraw consent:** In exercising the right of Data Subjects, if the Data Subject wishes to withdraw consent that he or she has provided as specified in this Regulations, the Company shall withdraw the consent according to the request of the Data Subject in all cases, and shall, at the same time, notify the Data Subject of the impact of such withdrawal of consent.
- (2) **The right to access Personal Data:** The Data Subject has the right to request access to his or her Personal Data, and he or she also has the right to request the Company to disclose how the Company obtained his or her data. In this regard, the Company shall consider whether or not the request meets certain criteria, including whether the request was made within a reasonable time and in a reasonable manner. The Company may exercise its right to reject the request of the Data Subject with reasons and not permit the Data Subject to access the data in the following events:
- (a) where it is necessary to comply with the law or court orders;
 - (b) It is a case that may affect and prejudice the rights and freedom of other persons;
 - (c) where the request is not made in writing in the Chinese or English language;
 - (d) where the Company is not supplied with such information as it may reasonably require in order to satisfy itself as to the identity of the requestor, or to locate the personal data to which the request relates; or
 - (e) where the request is not made in a reasonable manner.
- (3) **The right to rectify Personal Data:** The Data Subject has the right to request the Company to rectify his or her Personal Data so that it will be accurate, up to date, complete, and not misleading.
- (4) **The right to erase Personal Data:** The Data Subject has the right to request the Company to erase, destroy, or anonymize his or her Personal Data in any of the following cases, but for any other cases not specified herein, the Company shall exercise the right to reject such a request:
- (a) When it is not necessary to process Personal Data in accordance with the purpose;
 - (b) When the Data Subject withdraws his or her consent to data processing under this Regulations;

- (c) When the Data Subject exercises his or her right to object to data processing under this Regulations, and there is no reason for the Company to reject such objection; or
- (d) When the Personal Data has been processed on the basis of data processing or consent under this Regulations.

In this regard, if the Company considers erasing any Personal Data as requested by the Data Subject, for an activity in which the Company has disclosed Personal Data to other Data Processors, the Company shall notify every Data Processors of the exercise of the rights of Data Subject and erase the Personal Data retained by such persons for any other activities in connection with the activity in which the Data Subject has exercised the right to erase.

- (5) **The right to restrict data processing:** The Data Subject has the right to request the Company to restrict the use of his or her Personal Data in any of the following cases only, and for any other cases that is not specified, the Company shall exercise the right to reject the request:
 - (a) When the Company is undergoing the inspection of data because the Data Subject has asked to exercise the right to rectify his or her Personal Data under this Regulations;
 - (b) It is the data that is to be erased or destroyed under this Regulations, but the Data Subject requests the Company to restrict the use of such data instead;
 - (c) When it is not necessary to retain the Personal Data, but the Data Subject requests the Company to retain the Personal Data for the purpose of creating a right of claim under the Applicable Law, complying with or exercising the right of claim under the Applicable Law, or in defense of the right of claim under the Applicable Law;
 - (d) When the Company is undergoing the verification of the collection of Personal Data according to the exception from an objection request from the Data Subject under this Regulations or is undergoing the inspection on the processing of Personal Data for the purposes as specified by the Applicable Law.
- (6) **The right to Personal Data portability:** In the case that the Company's system is able to accommodate this, the Data Subject has the right to receive his or her Personal Data in a readable format that is commonly used by way of automatic equipment, or to request an automatic data transfer. In this regard, the Company may reject the request of the Data Subject if such Personal Data is retained as is necessary in complying with the law, or if complying with the request of the Data Subject may affect the rights and freedom of other persons.
- (7) **The right to reject the processing of Personal Data:** The Data Subject has the right to reject the processing of Personal Data that is related to him or her in any of the following cases, and for any other cases not specified herein, the Company shall exercise the right to reject the request:
 - (a) It is data that the Company has collected in accordance with its necessity in performing in the public interests of the Company, or in performing the duties of the Company under an order of the government, or due to its necessity for the purpose of the legitimate interests of the Company, or other juristic persons.

The Company may reject the request in)a) if it considers that the rejection of the processing of Personal Data will not be in compliance with the Applicable Law, or it relates to creating a right of claim under the law, complying or exercising the right of claim under the law, or defending against the right of claim under the law;

- (b) In the case that the Company processes Personal Data for the purpose of direct marketing;
- (c) In the case that the Company processes Personal Data for the purposes of research as specified by the Applicable Law, including in the field of statistics.

In exercising these rights, the Data Subject shall direct his or her request to the Administrative Department and the Human Resources Management Department for further referral to the DPO. In this regard, the Company must consider the request for exercising this right within 30 days from the date of receipt of complete information, unless otherwise extended as specified by law.

- 5. **Collection of Data:** The Company may collect only the Personal Data from Data Subjects in accordance with the purposes notified to the Data Subjects.
- 6. **Processing Data as Necessary:** Before the processing of Personal Data, consideration must be given to the necessity and the scope of the processing of Personal Data, in accordance with the purposes of the data collection. For example, if a document received contains Personal Data but it is not necessary for the Company to use such data, such as data of religion or blood groups on an identification card, such Personal Data must be blacked out or redacted or censored with markers provided by the Company. Alternatively, the Company may use a digital redaction or choose not to retain such information.

In this regard, for any activity in which it is not necessary to identify Data Subjects or statistical data can be used instead, the latter method shall be used. In addition, there should not be any collection of Personal Data in advance for any purpose which is not clearly defined in the future.

- 7. **Use and Retention of Data:** The Company shall use Personal Data for the purposes as notified to Data Subjects, or only with the consent of Data Subjects. The Company shall not retain Personal Data for any period longer than necessary. Accordingly, the Company will issue a Regulations for the erasure and destruction of documents or of data retained in electronic format, in order to set out the principles in consideration of the retention period of Personal Data, to which the Employee must strictly adhere. In this regard, any document not specified in this Regulations that are related to the erasure and destruction of documents, or of data retained in electronic format, the retention period of similar documents shall apply, or the matter shall be referred to the DPO.
- 8. **Erasure or Destruction of Data:** The Company shall not retain any data for a period longer than is reasonably necessary in accordance with the purposes the Data Subjects are notified of in the collection of Personal Data. The Company shall erase or destroy such data when the purpose of processing such data no longer exists, or when the Data Subject requests the Company to erase or destroy it, unless otherwise specified by law. In addition, the Company shall ensure that Data Processors erase or destroy the Personal Data that is processed for the Company after the contracts or agreements that have been entered into are expired or terminated.
- 9. **Access of Data:** The Employees are prohibited from accessing, using, amending, or disclosing the Personal Data collected by the Company, except where it is reasonably necessary for the performance of the duties of such personnel.
- 10. **Disclosure to Third Parties:** Personal Data may be disclosed to third parties only for the purposes that the Data Subjects have been notified of when the data are being processed, or if the consent of the Data Subject has been obtained)in the case that is necessary(. The method of the disclosure of Personal Data must be reasonably safe, for example, if data is disclosed by electronic methods, then a password is required to open the document in order to protect the Data Subject. Furthermore, the data may be disclosed only after obtaining a

confirmation from such third party by which the third party shall protect the Personal Data of Data Subjects in accordance with the contracts or agreements, laws, or other provisions.

11. **Processing of Personal Data by Data Processor:** In using the service of a Data Processor, the Company shall select a Data Processor with reasonable care including considering the appropriateness of the internal protective measures that the Data Processor has implemented to protect the data, and the reliability of such Data Processor. In addition, when a Data Processor is selected, the Company and the Data Processor shall enter into a Personal Data processing agreement in the form and content specified by the Company.
12. **Confidentiality:** Personal Data must be treated as confidential in accordance with the Regulations of the Company on information safety and security, whether they are printed materials or in an electronic format.
13. **Data Security:** The Company shall protect and retain Personal Data in accordance with the appropriate organizational and technical measures as prescribed by Applicable Law, in order to prevent unauthorized or accidental data access, data leakage, improper use, unlawful data processing and distribution, data loss and erasure, and unintentional data amendment or destruction. For example, for electronic data, encryption of data, or for printed materials, the item must be retained in a securely locked location and the person keeping the key must be clearly delegated.
14. **Data Quality:** The Company shall take reasonably practicable steps to ensure that the Personal Data in its possession is accurate and related to the purposes specified at the time of collection.
15. **Inspection and Compliance:** The Company shall inspect whether or not this Regulations has been complied with either by the Employees in the organization or by third parties in accordance with the procedure specified by the Company.
16. **Data Anonymization or Pseudonymization:** Before the processing of Personal Data, the necessity and scope of the processing of Personal Data in accordance with the purposes of such data collection must be taken into consideration. If the purpose can be achieved by the processing of data that does not require the identification of Data Subjects, or by using statistical data and the associated costs incurred are reasonable, the Personal Data should be anonymized or statistical data should be used.
17. **Complaint of Processing of Personal Data:** In the case that a Data Subject wishes to lodge a complaint on the processing of Personal Data of the Company, the Data Subject is advised to use the complaint form specified by the Company. The Company must consider the complaint within 30 days from the date of receipt of the complaint form with complete information.
18. **Record of Processing Activities:** The Personal Data recorded must be accurate and in line with the purposes for the collection of Personal Data by using the record of processing activities form as specified by the Company.
19. **Activities Requiring Data Protection Impact Assessment:** Care must be taken in the case of an ongoing activity, or an activity yet to be organized, that may involve a high risk of impact on the rights and freedom of Data Subjects. For example, such activity may result in discrimination, cause financial loss, reputation loss, disclosure of Personal Data, which must be protected according to professional confidential measures, unauthorized decoding of pseudonymized data, etc. The data protection impact assessment must be first carried out prior to the processing of such activities. In this regard, the preliminary principle to consider regarding whether any activity may involve a high risk can concern large-scale Personal Data that has been processed by an automatic system)including profiling(or collection of

Personal Data from sources other than directly from the Data Subjects without any privacy notice.