

PAN-INTERNATIONAL INDUSTRIAL CORP.

Privacy and Personal Data Protection Policy

Announcement Date: September 18, 2026

I. Policy Objectives

Pan-International Industrial Corp. and its subsidiaries (hereinafter referred to as the "Pan-International Group" or the "Group") respect the personal data and privacy rights of all natural persons, legal entities, and organizations interacting with the Pan-International Group, and are committed to protecting such data against infringement. Accordingly, in compliance with the Personal Data Protection Act (hereinafter referred to as the "PDPA") and other applicable laws and regulations, the Group has established this Privacy and Personal Data Protection Policy to demonstrate its commitment to safeguarding personal data and privacy rights. This Policy also serves as a guideline for the collection, processing, and use of personal data, and for preventing data breaches and improper use.

II. Scope of Application

This Policy applies to all matters concerning the collection, processing, utilization, international transfer, and retention of personal data belonging to customers, suppliers, shareholders, job applicants, employees, and other natural persons interacting with the Pan-International Group (hereinafter collectively referred to as "Data Subjects") during the Group's business operations. This Policy also applies to Pan-International Group websites, mobile applications, physical forms, and other related services.

Where local laws and regulations governing personal data protection in the countries or territories in which the Pan-International Group operates impose additional or different requirements, local policies complying with applicable statutory requirements may be formulated based on actual needs with reference to this Policy.

The Group shall also require third-party partners—including suppliers, contractors, and external consultants—to adhere to this Policy and implement appropriate management practices, thereby jointly safeguarding personal data and privacy.

III. Definition of Personal Data

Pursuant to Article 2 of the PDPA, personal data collected by the Pan-International Group refers to information that can directly or indirectly identify a natural person, including but not limited to:

- Basic Information: e.g., name, date of birth, national ID / identification number, contact address, telephone number, email address, etc.
- Financial and Transaction Data: e.g., bank account details, payment records, shareholding information, etc.
- Employment Data: e.g., resumes/CVs, compensation, performance reviews, attendance records, etc.
- Customer Service Records: e.g., inquiry logs, call recordings, etc.
- Online Identification Information: e.g., IP addresses, cookies, online browsing behavior records, etc.
- Other data capable of directly or indirectly identifying an individual.

Regarding special categories of personal data (sensitive personal data)—such as medical examination records, medical history, genetic information, sex life, criminal records, etc.—the Pan-International Group, in principle, does not actively collect such information. If collection or processing of sensitive personal data is required based on legitimate statutory grounds, it shall only be conducted after obtaining the prior consent of the Data Subject.

IV. Methods and Purposes of Personal Data Collection

The Group shall not collect, process, or utilize the personal data of any Data Subject without consent, unless applicable laws expressly permit such collection, processing, or utilization without prior consent. The Group shall ensure that the collection, processing, or utilization of personal data has a legitimate and reasonable connection with specific purposes and does not exceed the necessary scope thereof. The retention period of personal data shall not exceed the reasonable period necessary to fulfill the specific purposes, and as a general rule, shall not exceed five (5) years.

(1) Methods of Collection:

- Direct provision by Data Subjects (e.g., application forms, job applications, contracts, online registration).
- Collection via automated tools (e.g., website cookie tracking).
- Lawful provision by third parties (e.g., business partners, public information platforms).

(2) Purposes of Collection and Utilization:

In accordance with Article 19 of the PDPA, the Pan-International Group collects, processes, and utilizes personal data for the following specific purposes:

- Customer management and services.
- Marketing and business promotion.
- Human resources management.
- Investor and shareholder relations management.
- Contract performance and business transactions.
- Financial management and tax administration.
- Legal compliance and risk management.
- Information security and operational management.
- Other purposes with the consent of the Data Subject.

V. Scope and Methods of Personal Data Utilization

- Period of Utilization: The duration necessary for fulfilling the specific purposes of collection, or the retention period prescribed by relevant laws and regulations.
- Territory of Utilization: Jurisdictions where the Pan-International Group operates and locations where cloud data centers are hosted (including domestic and cross-border locations).
- Parties to Utilization: The Pan-International Group, affiliated enterprises within the Group, cooperative partners, outsourced service providers, or competent authorities authorized by law.
- Methods of Utilization: Electronic, paper-based, verbal, or any other legitimate means.

VI. Rights of Data Subjects

Data Subjects may, depending on the purpose of collection, choose whether to consent to (opt in to) or refuse (opt out of) the collection, processing, and utilization of their personal data, and may withdraw their consent at any time. Data Subjects may exercise the following rights pursuant to Article 3 of the PDPA through the publicly available contact channels provided by the Pan-International Group:

- Request to access or review their personal data.
- Request a copy of their personal data.
- Request the supplementation or correction of their personal data.
- Request the transfer of their personal data to a designated third-party data controller (data portability).
- Request the cessation of collection, processing, or utilization of their personal data.

- Request the erasure/deletion of their personal data.

VII. Security Management of Personal Data

Privacy and personal data protection constitute an integral part of the Pan-International Group's internal controls and risk management framework. The Information Security Department is responsible for overseeing personal data protection matters, and all relevant functional units shall support implementation in accordance with their respective duties. The Group conducts annual risk assessments and internal compliance audits regarding adherence to this Policy, strengthens policy communication and awareness training among employees, and conducts periodic or unscheduled compliance audits of suppliers to ensure that relevant operations comply with this Policy and applicable privacy and data protection laws and regulations. The Group maintains a zero-tolerance policy toward violations of privacy and personal data protection. If any violation is identified, the Group will review and improve its management measures and take disciplinary action against responsible personnel in accordance with company regulations.

The Group implements the following security measures to safeguard personal data:

- Access control and auditing mechanisms.
- Data encryption and firewall deployment.
- Enhanced employee training on information security and personal data protection.
- Supervision and management of external outsourced entities.
- Regular cybersecurity testing and contingency response mechanisms for responding to anomalies.

In the event of a data breach or cybersecurity incident, the Pan-International Group will report to the competent authorities and notify the affected Data Subjects in accordance with applicable laws.

VIII. Outsourced Processing and Cross-Border Transfers

The Pan-International Group may entrust third parties with the processing of personal data (such as IT service vendors, logistics providers, or customer support centers) or store data on overseas cloud servers. The Group will ensure that entrusted third parties provide an equivalent level of protection and enter into contractual provisions stipulating confidentiality and security safeguards.

IX. Third-Party Disclosures

Personal data collected by the Group shall be strictly kept within the scope necessary for specific purposes and managed prudently to prevent leakage, loss, or destruction; it shall not be provided or disclosed to third parties. If it is necessary for the Group to provide collected personal data to a third party, the Group will: first, verify the identity of the third party; second, inform the Data Subject and obtain their consent (unless notification is expressly exempted by law); and finally, disclose only the minimum necessary personal data while requiring the third party to manage the data properly in compliance with laws and regulations. The third party shall not process or utilize the data beyond the specific purpose of the entrusted task, nor copy, retain, sell, lease, use, or disclose the personal data in any manner.

X. Policy Amendments

This Policy shall come into effect upon approval by the General Manager; the same shall apply to any subsequent amendments. This Policy may be revised at any time in accordance with statutory updates or operational requirements of the Pan-International Group.