



美時化學製藥股份有限公司
Lotus Pharmaceutical Co., Ltd.

Personal Data Protection Management Policy

次版制定日期：2026 年 7 月 21 日

Version 02 : July 21, 2026

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1. Purpose

In response to the promulgation and implementation of the **Personal Data Protection Act** (hereinafter referred to as the “PDPA”), and to ensure that the Company complies with applicable requirements governing the collection, processing, and use of personal data, this Policy is hereby established.

2. Scope

This Policy applies to the Company and its affiliated entities over which the Company exercises control (collectively referred to as the “Company”).

3. Definitions

3.1. Personal Data

“Personal data” refers to a natural person's name, date of birth, national identification Card number, passport number, physical characteristics, fingerprints, marital status, family information, education background, occupation, medical records, healthcare data, genetic data, sex life, records of physical examination, criminal records, contact information, financial conditions, social activities, technical data and any other information that may be used to directly or indirectly identify a natural person.

3.2. Personal Data File

“Personal data file” refers to a collection of personal data structured to facilitate data retrieval and management by automated or non-automated means.

3.3. Collection

“Collection” refers to the act of collecting personal data in any way.

3.4. Processing

“Processing” refers to the act of recording, inputting, storing, compiling/editing, correcting, duplicating, retrieving, deleting, outputting, connecting or internally transferring data for the purpose of establishing or using a personal data file.

3.5. Use

“Use” refers to the act of using personal data via any methods other than processing.

3.6. Cross-border transfer

"Cross-border transfer" refers to the cross-border processing or use of personal data.

3.7. Government Agency

“Government agency” refers to central or local government agencies or non-departmental public bodies authorized to exercise public authority.

3.8. Non-Government Agency

“Non-government agency” refers to a natural person, legal person or group other than those stated in the preceding Section 3.7.

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3.9. Data Subject

“Data subject” refers to an individual whose personal data is collected, processed or used.

3.10 Competent Authority

“Competent authority” refers to the authority designated under the PDPA and related regulations.

4. Matters to be Observed in the Collection, Processing, and Use of Personal Data

4.1.

The collection, processing and use of personal data shall be carried out in a way that respects the data subject's rights and interests, in an honest and good-faith manner, shall not exceed the necessary scope of specific purposes, and shall have legitimate and reasonable connections with the purposes of collection.

4.2.

Where the Company collects, processes, or uses personal data under the commission of a government agency or non-government agency, the Company shall be deemed to be acting on behalf of the commissioning agency to the extent that the PDPA applies

4.3. Rights of the Data Subject

4.3.1. the right to make an inquiry of and to review his/her personal data;

4.3.2. the right to request a copy of his/her personal data;

4.3.3. the right to supplement or correct his/her personal data;

4.3.4. the right to demand the cessation of the collection, processing or use of his/her personal data;

4.3.5. the right to erase his/her personal data; and

4.3.6. The Company shall respond within **fifteen (15) days** upon receiving a request under Section 4.3.1 or 4.3.2, and within **thirty (30) days** upon receiving a request under Section 4.3.3, 4.3.4, or 4.3.5.

4.4.

Data pertaining to a natural person's healthcare, genetics, sex life, physical examination and criminal records shall not be collected, processed or used unless on any of the following bases:

4.4.1. Where expressly required by law.

4.4.2. Where it is within the necessary scope for a government agency to perform its statutory duties or for a non-government agency to fulfill its statutory obligation, or where the Company assists such agencies within the necessary scope

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aforementioned and appropriate security measures are adopted.

4.4.3. Where the personal data has been manifestly made public by the data subject or publicized legally.

4.4.4. Where it is necessary for statistics gathering or academic research by a government agency or an academic institution for the purpose of healthcare, public health, or crime prevention, provided that such data, as processed by the data provider or as disclosed by the data collector, may not lead to the identification of a specific data subject.

4.4.5. Where the data subject has consented to the collection, processing and use of his/her personal data in writing, except where the collection, processing or use exceeds the necessary scope of the specific purpose, or where the collection, processing or use based solely on the consent of the data subject is otherwise prohibited by law, or where such consent is not given by the data subject out of his/her free will.

4.5.

The Company shall expressly inform the data subject of the following information when collecting their personal data in accordance with Article 15 or 19 of the PDPA:

4.5.1. The name of the Company or its affiliated entity.

4.5.2. The purpose of collection.

4.5.3. The categories of the personal data to be collected.

4.5.4. The time period, territory, recipients, and methods of which the personal data is used.

4.5.5. The data subject's rights under Section 4.3 and the methods for exercising such rights.

4.5.6. The data subject's rights and interests that will be affected if he/she elects not to provide his/her personal data.

4.5.7. The obligation to inform as prescribed in the preceding Section 4.5 may be waived under any of the following circumstances:

4.5.7.1. Where notification may be waived in accordance with the law.

4.5.7.2. Where the collection of personal data is necessary for the government agencies to perform their statutory duties or the non-government agencies to fulfill their statutory obligation.

4.5.7.3. Where giving notice will prevent the government agencies from performing their statutory duties.

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4.5.7.4. Where giving notice will prevent the government agencies from performing their statutory duties.

4.5.7.5. Where the data subject has already known the content of the notification.

4.5.7.6. Where the collection of personal data is for non-profit purposes and clearly has no adverse effect on the data subject.

4.6.

The Company shall ensure the accuracy of personal in its possession and correct or supplement such data on its own initiative or upon the request of data subjects.

4.7.

In the event of a dispute regarding the accuracy of the personal data, the Company shall, on its own initiative or upon the request of the data subject, cease processing or using the personal data, unless the processing or use is either necessary for the performance of an official or business duty and the dispute has been recorded, or has been agreed to by the data subject in writing.

4.8.

When the specific purpose of data collection no longer exists, or upon expiration of the relevant time period, the Company shall, on its own initiative or upon the request of the data subject, erase or cease processing or using the personal data, unless the processing or use is either necessary for the performance of an official or business duty, or has been agreed to by the data subject in writing.

4.9.

The Company shall, on its own initiative or upon the request of the data subject, erase the personal data collected or cease collecting, processing or using the personal data in the event where the collection, processing or use of the personal data is in violation of the PDPA.

4.10.

If any failure to correct or supplement any personal data is attributable to the Company, the Company shall notify the persons who have been provided with such personal data after the correction or supplement is made.

4.11.

Except for the personal data specified in Section 4.4, the collection or processing of personal data by the Company shall be for specific purposes and on one of the following bases:

4.11.1. Where it is expressly required by law.

4.11.2. Where there is a contractual or quasi-contractual relationship between the

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Company and the data subject, and proper security measures have been adopted to ensure the security of the personal data.

4.11.3. Where the personal data has been manifestly made public by the data subject or publicized legally.

4.11.4. Where it is necessary for statistics gathering or academic research by an academic institution in pursuit of public interests, provided that such data, as processed by the data provider or as disclosed by the data collector, may not lead to the identification of a specific data subject.

4.11.5. Where consent has been given by the data subject.

4.11.6. Where it is necessary for furthering public interests.

4.11.7. Where the personal data is obtained from publicly available sources unless the data subject has an overriding interest in prohibiting the processing or use of such personal data.

4.11.8. Where the rights and interests of the data subject will not be infringed upon.

4.12.

Except for the types of data specified in Section 4.4, the Company shall use Personal Data within the scope necessary for the specific purpose of collection. However, Personal Data may be used beyond the specified purpose under the following circumstances:

4.12.1. Where it is expressly provided by law.

4.12.2. Where it is necessary for furthering public interests.

4.12.3. Where it is to prevent harm to the life, body, freedom, or property of the data subject.

4.12.4. Where it is to prevent material harm to the rights and interests of others.

4.12.5. Where it is necessary for statistics gathering or academic research by a government agency or an academic institution for public interests; provided that such data, as provided by the data provider or disclosed by the data collector, may not lead to the identification of a specific data subject.

4.12.6. Where consent has been given by the data subject.

4.12.7. Where it is for the data subject's rights and interests.

4.13. Marketing Use of Personal Data

When the Company uses personal data for marketing purpose pursuant to the preceding Section 4.11 and 4.12, upon the data subject's objection to such use, the Company shall cease using the data subject's personal data for marketing. The Company, when using the

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data subject's personal data for marketing purpose for the first time, shall provide the data subject the ways that he/she can object to such use, and the Company shall pay for the fees therefrom.

4.14.

If the Company violates this Policy and causes personal data to be stolen, leaked, altered, or otherwise infringed, the Company shall investigate and notify the data subjects in an appropriate manner. Where reporting to the competent authority is required under the PDPA or other applicable regulations, such reporting shall be made in accordance with the law.

4.15.

Where a data subject inquires about, reviews, or requests copies of personal data, the Company may charge necessary cost-based fees.

5. Management Responsibility

The department responsible for the collection, processing, or use of personal data shall serve as the responsible management unit for such data. Where necessary, the department shall consult the Legal Department to ensure legal compliance.

6. Privacy Policy

The Privacy Policy publicly announced by the Company shall be deemed an extension of this Policy. All departments shall ensure that their operational procedures are consistent with and fulfill the commitments set forth in the Privacy Policy. In the event that this Policy is amended, the Privacy Policy shall be revised accordingly.

7. Effective Date

This Policy and its related appendices shall take effect upon announcement. Any subsequent amendments shall also take effect upon announcement.

8. Appendix

Appendix 1: **Personal Data File Security Maintenance Plan**