

The Shanghai Commercial & Savings Bank, Ltd.

Group-Level Personal Data Protection Policy

Established by Legal Compliance Department on 2021.03.27

Revised on 2022.03.26

Article 1 Purpose

This Policy is established to construct the Group's personal data protection system basic management structure along with the consideration of the customer and industrial characteristics of each individual company in the Group, thereby protecting the interests of personal data owners.

Article 2 Applicable Subject and Scope

The applicable subjects of this Policy includes all conducts made by employees of the Bank (including domestic and overseas branches), subsidiaries Shanghai Commercial Bank Hong Kong , AMK Microfinance Institution Plc. Cambodia (hereinafter referred to as "the Bank and "subsidiaries") and service provider or suppliers in cooperation with The Bank or its subsidiaries."

For the employees described in the preceding paragraph, the personal data protection obligation specified in this Policy shall not be waived due to termination of the employment relationship. During the entrustment for collection, processing and use of personal data, the Bank and subsidiaries shall request the trustee unit to comply with the local information security and confidentiality related laws and regulations.

Article 3 Definition of Personal Data

The definition of personal data shall refer to the "Personal Data Protection Act" and relevant regulations of R.O.C. However, when the local legal and competent authority adopts higher standards, such standards shall prevail. In case of any doubts in the determination of the level of standards, the decision made by

the competent authority of R.O.C. Shall be used as the basis for the standard.

In case of prohibitions due to local laws such that standards identical to the ones specified in this Policy cannot be adopted, appropriate extra measures shall be adopted in order to manage personal data.

Article 4 Principle

The collection, processing and use of personal data shall be carried out in a way that respects the data owner's interest, in an honest and good-faith manner and shall comply with the local personal data protection law and requirements of competent authority.

Cross-border transmission of personal data shall only be performed under the condition where the transmission complies with the local laws and relevant regulations of the competent authority and where there is appropriate protection.

For personal data files, it is necessary to adopt appropriate security measures in order to ensure that the Group has fulfilled the due care of a prudent administrator for the personal data possessed.

Article 5 Internal Control and Dedicated Department

The Bank and subsidiaries shall establish internal regulations for the protection and management of personal data, which shall also be approved by the board of directors or managing department authorized.

The Bank and Subsidiaries shall respectively establish a personal data protection dedicated department and shall also consider the reasonable allocation of management resources in order to arrange appropriate management personnel and sufficient resources.

The personal data protection dedicated department shall identify external units related to the personal data protection management and shall also understand the requirements for the personal data protection management.

Article 6 Non-disclosure Obligation

The Bank and subsidiaries shall comply with the principle of personal data protection specified in Article 4 of this Policy. In addition to the compliance with the local laws or requirements of competent authority, it is prohibited to provide personal data to a third party without the signing of a non-disclosure agreement. The provision of personal data shall satisfy the requirements of necessity and appropriateness.

The Bank or its subsidiaries, when outsourcing its operations or cooperating with suppliers, shall include major personal data protection internal regulations in the contract as attachments or specify personal data confidentiality terms and liabilities in the contract. The service provider and suppliers shall be supervised properly. In addition, .”

Article 7 Education and Training

The Bank and subsidiaries shall implement personal data protection education and training for their employees according to the latest laws and regulations, requests of competent Authority or business management needs.

Article 8 Personal Data Incident Handling Mechanism

The Bank and subsidiaries shall establish personal data security incident prevention, reporting and response handling mechanism.

Article 9 Supplemental Provisions

Any matters not specified in this Policy shall be handled in accordance with relevant local laws where the Bank and subsidiaries are located and regulations of competent authority.

Article 10 Approval Hierarchy

This Policy shall be approved by the board of directors before implementation. The same requirement shall be applied to amendments thereof.