



Wan Hai Lines Ltd.

Personal Data Protection Policy

1. Purpose :

Wan Hai Lines Ltd. (hereinafter referred to as “the Company”) has established this policy to ensure compliance with applicable personal data protection laws, to implement comprehensive mechanisms for the protection and management of personal data, and to promote its reasonable and lawful use.

2. Scope :

This policy applies to all employees of the Company, its branches, and subsidiaries, as well as customers and vendors who, through business interactions or use of the Company’s official website and related websites, obtain personal data from the Company. All aforementioned parties shall be governed by the provisions of this policy.

3. Personal Data Protection Measures :

- (1) Establish a security maintenance system for personal data files, and assign a dedicated personal data file security maintenance team to ensure its effective operation and continuous improvement.
- (2) Provide comprehensive training and education to ensure that all employees understand the requirements of relevant personal data protection laws, their responsibilities, and the mechanisms, procedures, and measures for personal data protection.
- (3) Incorporate personal data protection topics into audit, risk management, and legal compliance operations.
- (4) Conduct regular reviews of this policy to ensure the ongoing effectiveness of personal data protection measures.
- (5) All measures outlined above are designed to comply with the Personal Data Protection Act and its enforcement rules, as well as any timely amendments to relevant laws and regulations. The Company may also consider future management

needs of its domestic and overseas branches or subsidiaries, and refer to international legal frameworks (such as the EU General Data Protection Regulation) to proactively establish relevant regulations or management measures.

4. Zero-Tolerance Policy and Penalties :

- (1) The Company adopts a zero-tolerance stance toward violations of this policy.
- (2) If, after investigation, it is determined that an employee has violated this policy, disciplinary action will be taken in accordance with internal regulations, and legal liability will be pursued.
- (3) If any other party subject to this policy violates its provisions and thereby affects the rights and interests of the Company, and such violation is verified and results in damage to the Company, the party responsible shall be required to bear liability for damages in accordance with the contract or applicable laws.

5. Any matters not expressly stipulated in this policy shall be administered in accordance with other applicable internal and external regulations.