宏碁集團個人資料保護管理政策

為規範 Acer Group 個人資料之蒐集、處理、利用及國際傳輸,避免違反隱私保護法規並促進個人資料之合理利用,特訂定本政策。

- 1. 組織:宏碁集團總部與各區域營運總部應設立個人資料保護管理組織或設立 兼管資料保護之網路資訊安全組織,並應制定個人資料管理相關權責與職掌。
- 2. 管理制度:宏碁集團應建立與執行個人資料蒐集、處理及利用之程序與安全維護管理制度。蒐集與處理個人資料應符合透明、必要、合目的性及正確性等原則。非經宏碁集團全球個人資料管理組織之特別許可,宏碁集團不蒐集顧客信用卡或類似支付工具等個人資料,且不得涉及出售個人資料。
- 3. 保障個資所有人之權利:宏碁集團總部與各區域總部應依相關個資準據法規 定受理當事人可行使之權利請求,並提供申訴管道與損害賠償處理程序。
- 4. 安全機制:宏碁集團應建立與執行個人資料儲存管理、刪除、處置與傳輸等安全管理程序,落實個人資料存取控管權限及軌跡留存。
- 5. 應變程序:宏碁集團應建立與執行個人資料事故之預防、鑑識、通報及應變管 理程序,確保符合相關法規對事故應變處理之要求。
- 6. 風險管理機制:

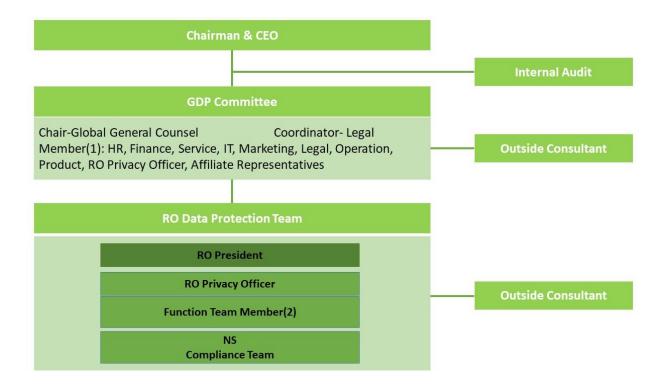
宏碁集團應:

- (1) 落實個人資料風險管理,執行個人資料盤點及風險評估。
- (2) 落實個人資料處理經辦人教育訓練及處理個人資料的設備安全控管。
- (3) 不定期實施資安測試演練。
- (4) 確實監督受託委外廠商遵循個人資料保護管理規定
- 7. 內外部稽核機制:定期執行個人資料管理內部稽核,持續改善個人資料管理制度,以及視需求委託外部專業機構執行個人資料管理評估及稽核。
- 8. 本管理政策經宏碁集團執行長核准後頒訂施行,並得視全球個資保護相關法 令之變更或實際執行需求而修訂之。

附件: 組織圖及權責表(Annex: Organization Chart and Roles & Responsibilities)

Annex: Organization Chart and Roles & Responsibilities

1. Global Data Protection ("GDP")- Organization Chart



- (1) GDP members include the Heads of Global HR, Finance, Service, IT, Marketing,

 Operation, Product BG Head, RO Privacy Officer, and Affiliate Representative(optional).
- (2) RO Function team members will be identified by RO Privacy Officer, however, Legal, HR, Finance, Service, IT, Marketing, Operation, Logistic and Product team representative shall be included.

2. Global Data Protection ("GDP") Roles & Responsibilities

Organization/Roles	Responsibilities
GDP Committee	(1) Propose global policies for Chairman & CEO's final approve.
	(2) Internal Announcement
	(3) Training and Drill (Planning)
	(4) Management of any global or cross-RO incident
	(5) Audit Plan and Co-work with internal and external auditors
	(6) Ensuring privacy by design to enforce data protection from day 1 of a new
	project/product
Chair of GDP	(1) draft global data protection policies and SOP for Committee's review and
Committee	discussion
	(2) Monitor global data protection compliances
	(3) Design, Build and maintain a e-system for global data protection
	compliance
	(4) Lead the global/cross-RO incident
RO Privacy Officer&	(1) NS laws and regulations collection for GDP Committee reference
Team Members	(2) RO GDP compliance
	(3) RO audit, training and drill execution
	(4) Guide and support NS compliance
The Executives	(1) Review and approve global or RO policies, guidelines or rules
	(2) Final decision on incident management
Function Team	(1) Support GDP Committee, Chair of GDP Committee and RO Privacy Officer
Members	(2) Liaise with the NS point of contact
NS Compliance	(1) Collection and update any laws and regulations
	(2) Support training, drill and audit
	(3) Other local compliance matters