

# Privacy Policy

In this Privacy Policy (“Policy”), we, Compal Incorporated and our subsidiaries (collectively “we”, “us”, or “our”), provide information about how we collect, use, process, and transfer personal data. Compal Incorporated and our subsidiaries are a global organization sharing the data we manage across businesses (legal entities), business processes, and information systems around the world. Therefore, for this Policy, we use the term “personal data” broadly to cover the many privacy and data protection laws applicable to us; generally “personal data” means information related to an identified natural person or that could reasonably be used (by itself or in combination with other data available) to identify a natural person.

## Scope

This Policy applies to our websites, products, services, software, or apps on which we post a direct link to this Policy or refer to within this Policy (collectively the "Services"). This Policy covers data collected through the Services and not any data collection or processing practices of other services that maintain their own, separate privacy policies. Occasionally, we refer to this Policy in relation to surveys and special-purpose web pages, for example, our Careers web pages; under such

circumstances, this Policy applies as modified in the particular notice or consent request (e.g., with respect to types of data collected or purposes of collection).

## **Types of Data and Collection Methods**

The personal data we collect depends on how you interact with us, the services you use, and the choices you make.

### **(1) Websites**

When you visit our websites, we collect some information automatically. For example:

**Device and Browser Information:** When you visit one of our websites, we collect general data from your computer or mobile device such as your browser type, operating system, IP address and the domain name from which you accessed the site, and if you are accessing our site with your mobile device, type of mobile device.

**Browsing Activities:** We collect data about how you use our websites, such as the date and time you visit the site, the areas or pages of the site that you visit, the amount of time you spend viewing the site, the number of times you return to the site and other click-stream data.

**Cookies.** We use cookies, web beacons, or similar technologies to collect data about your use of our websites or web apps. A cookie is a small text file that is stored on the hard drive of your computer or device when you access the

site. We use cookies to help operate our sites and Services, including to: (1) remember you so you don't have to enter the same information when you return to the site, (2) provide you with customized content or offers on the site; (3) develop aggregate statistics to help monitor site performance, conduct research, improve our content and services, and (4) help protect the security of our sites and services. We also allow other companies, acting as our service providers, such as web analytics partners, advertisers, or ad networks to set or access their cookies or web beacons (also referred to as 1x1 pixel gifs or action tags) on the site. For example, we use third party advertising companies to serve ads on our behalf across the Internet. These third-party advertising companies use cookies and web beacons to measure and improve the effectiveness of ads for their clients, including us. To do so, these companies use data about your visits to our site and other websites over time. This data may include: date/time of banner ad shown, a unique identifier contained in their cookie, mobile IDs, the IP address of your device, and associated device and usage data. This data can also be used to personalize ads so that you are more likely to see ads about goods and services of interest to you. If you would like more information about this practice and your choices about personalized advertising, please see our Cookie Policy or visit [this opt-out article](#). You are free to decline cookies, but by doing so, you may not be able to use some features on the site or take full advantage of our offerings.

## **(2)            *Marketing Events***

When you participate in our events or campaigns, we collect and process the personal data you provide to us. For example, if you take pictures or videos with devices provided by us, we collect and process your images and may use your email address to send you the processed pictures or video clips. If the device generates an augmented or virtual reality image of you, your snapshot will be converted into facial scan data, and then uploaded to our servers or those of our vendors to generate the face or body attributes (such as your perceived gender, hair color, skin color, age estimation, etc.), which is necessary to create the final products you requested.

When you join and interact with our ORAN program, either on a website, through a mobile app, or via other channels we provide, we collect your name, email address and other information as permitted by you to run this program.

In addition, we may take photos, videos or any recordings in other formats about the events you participate in, for the purpose of recording the events for our internal use, external reporting, and public promotions to cultivate and maintain the company's public relationship. Accordingly, we may collect your voice or image for media productions such as film, audio tape, video tape, audio-visual work, photograph, illustration, animation, broadcast, product packaging, advertising, or promotional material.

If you have any legal questions relating to our marketing practices, you can send an email to [info@compal.com](mailto:info@compal.com).

### **(3)        *Software, Applications, and Services***

We offer a variety of software, applications, and services that collect or process data. Some such software, applications, and services, may include a data exchange with our servers to enable a functionality, deliver a service, enable research and development, or other business purpose.

### **(4)        *Vehicle Data Collection***

We operate specially marked vehicles that take pictures and record videos in and from public spaces, private company premises, test sites and other areas. We use these images and videos for research, development, testing, verification and validation of automotive and mobile technologies. The vehicles are equipped with camera systems and location technologies. These systems record, process and store videos and images from the vehicle's surroundings associated with location and time. Anyone near one of the marked vehicles during operations could potentially be included in the imagery or videos. In addition, we may also obtain pictures or videos from third party sources such as researchers, universities, other companies, or public sources.

In the context of this data processing, images of pedestrians, cyclists, cars' occupants and other individuals are analyzed, classified, and further processed as "items" in the framework of the real environmental and traffic conditions. For example, an individual could be classified as "a pedestrian at left side of lane", or as "a cyclist passing the car from the right side".

Identifying the individuals in the recordings is neither necessary nor intended as part of this processing activity and is typically complicated or not possible. Nevertheless, since the raw data that is required consists of video and images, it is impossible to rule out the identifiability of people in this process.

## **(5) *Compal Smart Campus***

Some of our campuses and facilities deploy smart campus technologies to help us develop, test and demonstrate the technologies for the smart city of the future. When you visit any of them, your personal data may be captured by cameras or other sensor devices embedded into our buildings, shuttles, security systems and other infrastructure. For example, when you park your car in certain garages of our campus, your vehicle license plate number and parking spot may be automatically recorded by the hanging ceiling sensors there, used for our smart parking product development to improve the future parking experience. When you walk around our campus, your images may be captured by some AI-enabled camera systems and IoT sensors, to test our technologies that may be used to detect crowds or suspicious malicious actors. Where required by law, we display notices and only deploy these devices in common areas of our private campuses and facilities.

## **(6) *Other Data You Submit***

We may collect other personal data you submitted to us. Below lists a few examples.

Contact or Registration Information: We collect your name, email address(es), mailing address(es), telephone number(s), and data related to the business you represent when you request information from us, register, order a product or service, visit our offices, or otherwise intentionally provide us such information.

Payment Information: In connection with chargeable Services, we will also collect payment information (e.g., credit card number and related verification data), phone number, and billing and shipping addresses.

## **(7) *Third Party Sources***

We may also obtain personal data from third party sources such as data providers, social networks, organizers of the events we sponsor, other partners, or public sources. For example, like most companies and organizations, we collect business contact information and other personal data from public and third-party sources related to current, former, or prospective business contacts including representatives of other companies, civil society organizations, the press, and governmental bodies.

## **Collection Purposes, Use of Data**

We collect and process personal data about you with your consent and/or as necessary to provide the products you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our

customers, or fulfil other legitimate interests. The purposes for which we collect and use each of the categories of personal data include:

- To respond to the request that you sent us such as your request for information, or your request to subscribe to a service or purchase a product;
- To provide, manage, maintain, and secure the Service(s) you request;
- To enable you to participate in our marketing events;
- To operate and improve our business, including to administer, protect, and improve our services and our systems, to develop new products and services, and for other internal business purposes;
- To better understand the preferences of the users of our Services, compile aggregated statistics about usage of our Services, and help personalize your experience of our website and Services;
- To provide you with information about our technologies, product or service releases, news, and other communications;
- To comply with our legal obligations; and
- Any other use we describe in this Policy or at the point where we collect the data.

To achieve these purposes, and to the extent permitted by applicable law, we may combine the various types of data that we collect from different on and offline sources. In addition, we may de-identify and/or anonymize the personal data we collect such that it no longer can be used to identify you and, in such case, the de-identified and/or anonymized data is no longer subject to this Policy and we use such data for our business purposes.

# Where We Store and Process Data

We store and process data in the United States and on servers around in the world, including, without limitation, Asia and the European Economic Area. Wherever we store or process personal data pursuant to this Policy, we take measures designed to ensure that the data is processed in accordance with this Policy and in compliance with applicable law.

We transfer personal data from the European Economic Area to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. When we do so, we use a variety of legal mechanisms to effectuate the transfer (such as your consent or adequate legal contracts).

## Disclosures of Personal Data

We may disclose each of the categories of personal data we collect with the following types of third parties.

- Compal subsidiaries may have access to personal data we collect, for example, where we share common data systems, where access is needed to provide our Services or operate our business, or when we share your request to subscribe to a newsletter regarding certain products or services with the applicable Compal subsidiary.
- We may also make personal data available to service providers who process the data on our behalf for the purposes set forth in this Policy. For example, companies we've hired to provide customer service support or assist in protecting and securing our systems and Services

may need access to personal data to provide those functions. If you participate in our marketing events, our event vendors may also have access to your data during their supportive work, such as the system debugging of our on-site devices. See also the description above in the section on cookies regarding our use of advertising and analytics service providers.

- We may also offer training or other Services to the employees and workers of our business customers. In such cases, we may share data relating to the use of our training and other Services with the identified business customers for their business use.
- We may also disclose your data as required by law or in the interest of protecting or exercising our or others' legal rights, protecting the security of our systems or those of our customers, and protecting people's physical safety. Such disclosures may occur, e.g., without limitation, in connection with requests from law enforcement officials and in connection with court proceedings.
- We may share or transfer your data in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business, including related negotiations.
- Finally, we may also share your personal data where you have granted us permission.

Note that we do not “sell” personal data as that term is defined by the California Consumer Protection Act (“CCPA”) and similar legislation, and have not done so in the previous 12 months.

## Your Choices

**Opt-In/Out.** In some circumstances, such as email marketing, we offer you the ability to opt-in or opt-out of some kinds of data collection, use, or sharing. In such circumstances, we will respect your choice.

**Data Subject Rights.** The laws of some countries or states allow you to request access, correction, deletion, restriction, or other rights with respect to your personal data.

If you have trouble exercising your rights using the above link, you may contact us using the information at the bottom of this Policy. Please note that to provide or delete specific pieces of personal data we will require you to provide information sufficient to verify your identity to the degree of certainty required by law.

In some jurisdictions, you have a right to designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us.

**Do Not Track & Global Privacy Controls.** You may use your device's "Do Not Track" or "Global Privacy Controls" to opt out of our, and our ad partner's on our behalf, targeting cookies. You may also use a variety of other means of controlling data collection and use, including the Cookie Settings at the bottom of our website, cookie controls in your browser settings and the personalized advertising controls described in the Cookies section above.

**Non-Discrimination/Financial Incentives.** The laws of some countries or states prohibit us from discriminating against you for exercising your rights described above and imposes requirements on any financial incentives offered to you related

to your information. If we offer any such financial incentives, we will describe them in more detail here.

## **Retention**

We retain personal data while your account is active, or as needed to provide you Services. We will delete or de-identify personal data within a reasonable time after the data is no longer necessary for the business purposes for which it was collected. We will, however, retain and use personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Security**

Transmissions over the Internet are never 100% secure or error-free. However, we take reasonable steps to protect your data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. It is your responsibility to safeguard your passwords and User IDs and to notify us using one of the contact methods listed below if you ever suspect that your password or User ID for one of our Services has been compromised. To help us protect personal data, we request that you use a strong password and never share your password with anyone or use the same password with other sites or accounts. You are solely responsible for any unauthorized use of our Services conducted via your password and User ID.

## **Amendments**

We reserve the right to change, modify, add, or remove portions of this Policy at any time, but will alert you that changes have been made by indicating on the Policy the date it was last updated. If we change the Policy in a material way, we will provide appropriate online notice to you at least thirty days in advance and/or obtain your express consent as required by law. When you visit our websites or use our Services, you are accepting the current version of this Policy. We recommend that users revisit this Policy on occasion to learn of any changes.

## **Contact Us**

To contact us, send us an email at [info@compal.com](mailto:info@compal.com), or write to us at Compal Incorporated, Attn. Privacy Counsel, No. 581 & 581-1, Ruiguang Rd., Neihu District, Taipei City 11492, Taiwan, R.O.C

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