

PRIVILEGED & CONFIDENTIAL

PRIVACY POLICY

(A) This Policy

This Notice is issued by Getac Technology Corporation on behalf of itself, its subsidiaries and its affiliates (together, “**Getac**”) and is addressed to individuals outside our organisation with whom we interact, including consumers and visitors to our websites (together, “**you**”). Defined terms used in this Policy are explained in Section (M) below.

For the purposes of this Policy, Getac is the Controller. Contact details are provided in Section (L) below.

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

(B) Processing your Personal Data

Collection of Personal Data: We may collect Personal Data about you, such as your name, address and contact details. Examples of sources from which we may collect Personal Data include the following:

- We may obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We may collect your Personal Data in the ordinary course of our relationship with you (e.g., if you purchase a product or service from us).
- We may collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We may receive your Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).
- We may collect or obtain Personal Data when you visit any Getac website (a “**Site**”) or use any features or resources available on or through a Site. When you visit a Site, your device and browser will automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

Creation of Personal Data: We may also create Personal Data about you, such as records of your interactions with us, and details of your purchase history.

Relevant Personal Data: The categories of Personal Data about you that we may Process include:

- Personal details: given name(s); preferred name; gender; date of birth / age; nationality; and photograph.
- Contact details: shipping address; telephone number; email address; and social media profile details.
- Payment details: billing address; bank account number or credit card number; cardholder or account holder name; card or account security details; card ‘valid from’ date; card expiry date.
- Views and opinions: any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

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Lawful basis for Processing Personal Data: In Processing your Personal Data in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- we have obtained your prior express consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way);
- the Processing is necessary in connection with any contract that you may enter into with us;
- the Processing is required by applicable law;
- the Processing is necessary to protect the vital interests of any individual; or
- We have a legitimate interest in carrying out the Processing for the purpose of managing, operating or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

Processing your Sensitive Personal Data: We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);
- the Processing is necessary for the detection or prevention of crime (including the prevention of fraud);
- the Processing is necessary for the establishment, exercise or defence of legal rights; or
- we have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Purposes for which we may Process your Personal Data: The purposes for which we may Process Personal Data, subject to applicable law, include:

- Our Sites: operating and managing our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites.
- Provision of products and services to you: providing our Sites and other services to you; providing you with products that you have purchased; providing you with promotional items at your request; and communicating with you in relation to those products and services.
- Communications and IT operations: management of our communications systems; operation of IT security; and IT security audits.
- Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.
- Financial management: sales; finance; corporate audit; and vendor management.
- Surveys: engaging with you for the purposes of obtaining your views on our products and services.
- Improving our products and services: identifying issues with existing products and services; planning improvements to existing products and services; creating new products and services.

(C) Disclosure of Personal Data to third parties

We may disclose your Personal Data to other entities within the Getac group, for legitimate business purposes (including providing services to you and operating our Sites), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;

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- accountants, auditors, lawyers and other outside professional advisors to Getac, subject to binding contractual obligations of confidentiality;
- third party Processors (such as payment services providers; shipping companies; etc.), located anywhere in the world, subject to the requirements noted below in this Section (C);
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security;
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- our Sites may use third party plugins or content (e.g., LinkedIn, YouTube and Facebook). If you choose to interact with any such plugins or content, your Personal Data may be shared with the third party provider of the relevant social media platform.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

(D) International transfer of Personal Data

Because of the international nature of our business, we may need to transfer your Personal Data within the Getac group, and to third parties as noted in Section (C) above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Where we transfer your Personal Data to other countries, we do so on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section (L) below.

(E) Data Security

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

You are responsible for ensuring that any Personal Data that you send to us are sent securely.

(F) Data Accuracy

We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

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(G) Data Minimisation

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

(H) Data Retention

The criteria for determining the duration for which we will keep your Personal data are as follows: we will retain copies of your Personal Data in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. In particular, we may retain your Personal Data for the duration of any period necessary to establish, exercise or defend any legal rights.

(I) Your legal rights

Subject to applicable law, you may have a number of rights regarding the Processing of your Personal Data, including:

- the right to request access to, or copies of, your Personal Data that we Process or control;
- the right to request rectification of any inaccuracies in your Personal Data that we Process or control;
- the right to request, on legitimate grounds:
 - erasure of your Personal Data that we Process or control; or
 - restriction of Processing of your Personal Data that we Process or control;
- the right to object, on legitimate grounds, to the Processing of your Personal Data by us or on our behalf;
- the right to have your Personal Data that we Process or control transferred to another Controller, to the extent applicable;
- where we Process your Personal Data on the basis of your consent, the right to withdraw that consent; and
- the right to lodge complaints with a Data Protection Authority regarding the Processing of your Personal Data by us or on our behalf.

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or about our Processing of your Personal Data, please use the contact details provided in Section (L) below.

(J) Cookies

A cookie is a small file that is placed on your device when you visit a website (including our Sites). It records information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through cookie technology, in accordance with our [Cookie Policy](#).

(K) Terms of Use

All use of our Sites is subject to our [Terms of Use](#).

(L) Contact details

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If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by Getac, please contact:

GETAC Service Centre
Getac Technology Corporation
4th Floor, No. 1
R&D 2nd Road
Science Based Industrial Park
BAOSHAN 300
Taiwan
GetacSupport_Global <GetacSupport_Global@getac.com>

(M) Definitions

- **‘Controller’** means the entity that decides how and why Personal Data is Processed. In many jurisdictions, the Controller has primary responsibility for complying with applicable data protection laws.
- **‘Data Protection Authority’** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **‘Personal Data’** means information that is about any individual, or from which any individual is identifiable. Examples of Personal Data that we may Process are provided in Section (B) above.
- **‘Process’, ‘Processing’ or ‘Processed’** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **‘Processor’** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **‘Sensitive Personal Data’** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.