



PRIVACY POLICY

1. Introduction

- 1.1 This Privacy Policy addresses the rules and procedures to be followed by Sino-American Silicon Products Inc. and its subsidiaries (collectively, SAS) pertaining to the collection, processing, use, storage and disclosure of personal data of an identifiable natural person.

2. Privacy Protection

- 2.1 SAS is committed to complying with all applicable laws and regulations with regard to privacy and personal data protection.
- 2.2 SAS and its staff members at all times respect the confidentiality of the personal data placed in its care in order to prevent any unauthorized disclosure of or access to personal data. SAS endeavors to ensure that the measures used in the collection, processing, use, storage and disclosure of personal data sufficiently reflect the confidential nature of such data.
- 2.3 All personal data will be released internally only on a need-to-know basis. The processing of personal data will be strictly confined within the scope which is necessary for SAS's operation or which the personal data was originally collected.

3. Collection and Processing of Personal Information

- 3.1 **Necessity Test** : Personal data will not be collected, processed or used by SAS without a reasonable business purpose. The type, amount, usage and retention periods of personal data collected by SAS will be limited to the minimum necessary scope to accomplish reasonable business purposes.
- 3.2 **Notification Duty** : The purposes for which personal data is being collected will be identified by SAS before it is collected. SAS will also inform the data subject orally or in writing of the stated purpose(s), period of usage, retention period, how the data will be used, who will be using the data, and the legal rights that may be exercised by the data subject, except where laws or regulations otherwise exempt SAS from the notification duty. In the case laws or regulations so require, SAS will also obtain consent from the data subject.
- 3.3 **Stated Purpose** : Personal data will only be used for the stated purpose(s) at the time when it was originally collected. Nevertheless, SAS may use personal data for a purpose other than the originally stated purpose where the new purpose is required by laws or regulations or where SAS has obtained consent from the data subject for each new purpose.

4. Security

- 4.1 Each responsible unit handling personal data within SAS will take and enforce all reasonable security measures appropriate for protection of such data.
- 4.2 In the case of any data security breach in any form of theft, unauthorized modification, damage, destruction, unauthorized use, unauthorized disclosure, etc., SAS shall without undue delay notify the affected data subject of the nature of the breach and the measures taken by SAS to address the breach after completing the investigation.



4.3 The compliance team of SAS will regularly conduct audits and trainings to ensure that the collection, processing, use, storage and disclosure of personal data by each responsible unit complies with legal requirements.

5. Data Subject Rights

- 5.1 **Right to Consent and Opt-In.** Where the collection, processing, or use of personal data requires the Data Subject's consent under applicable privacy laws and regulations, Data Subjects have the right to provide or withhold such consent. Where required by applicable law, consent will be obtained through an affirmative opt-in mechanism before the relevant processing activities are undertaken.
- 5.2 **Right to Withdraw Consent and Opt-Out.** Where the processing of personal data is based on the Data Subject's consent, Data Subjects have the right to withdraw such consent at any time, subject to applicable laws and regulations. Where applicable, Data Subjects also have the right to opt-out of particular uses or processing activities.
- 5.3 **Right of Access.** Data Subjects may inquire about, request access to, or request a copy of their personal data held by SAS, to the extent permitted by applicable law.
- 5.4 **Right to Rectification.** Data Subjects may request that SAS supplement, correct, or update their personal data where such data is inaccurate or incomplete.
- 5.5 **Right to Restriction or Cessation of Processing.** Data Subjects have the right to object to or request that SAS restrict, suspend, or discontinue the processing or use of their personal data in circumstances permitted by applicable law, including where the accuracy of the personal data is disputed.
- 5.6 **Right to Erasure or Deletion.** Data Subjects may request that SAS delete their personal data, or discontinue its processing or use, where the purposes for which the personal data was collected no longer exist or where otherwise permitted or required by applicable law.

6. Execution

- 6.1 SAS maintains a zero-tolerance approach to the misuse, unauthorized access, disclosure, or other improper handling of personal data. Any staff member who breaches this Privacy Policy or applicable data protection requirements may be subject to disciplinary action.

Chairperson 

October 2026