



Data Privacy Policy

SHAMROCK PAN PACIFIC Co., Ltd. (the "Company") recognises the importance of handling personal information appropriately in its marketing consulting business. As a company committed to contributing to society, the Company establishes this Data Privacy Policy, and its directors and employees will comply with it and make every effort to protect personal information and individual rights.

1. Purpose Limitation

When obtaining personal information, the Company will identify the purpose of use as specifically as possible and collect personal information only to the extent necessary to achieve that purpose.

2. Notice When Collecting Personal Information

When collecting personal information directly from an individual in writing, the Company will provide prior notice of its name, the name and contact details of the person responsible for protecting personal information, the purpose of use and other necessary matters, and will collect personal information only to the extent required.

3. Use Within the Agreed Purpose

Personal information will be used only within the scope of the purpose for which the individual has given consent. The Company will establish and implement appropriate procedures to ensure that personal information is not used for any purpose beyond that scope.

4. No Unauthorised Disclosure or Provision

The Company will manage retained personal information appropriately and will not disclose or provide it to any third party without the individual's consent.

5. Accuracy and Security

The Company will maintain retained personal information accurately and in an up-to-date condition to the extent necessary for the purpose of use. It will also take reasonable security measures to prevent leakage, loss, destruction and other risks, and will work to prevent and correct such incidents.

6. Management of Service Providers

Where the processing of personal information is outsourced, the Company will contractually require the service provider to prevent leakage and unauthorised provision to third parties and will exercise appropriate supervision over the service provider.

7. Complaints and Enquiries

The Company will respond promptly, sincerely and appropriately to complaints and enquiries concerning retained personal information.

8. Compliance

The Company will comply with laws, government guidelines and other applicable standards concerning the handling of personal information.

9. Continuous Improvement

The Company will establish a personal information protection management system, review it periodically and improve it continuously.

Established: 1 October 2025

SHAMROCK PAN PACIFIC Co., Ltd. | Representative Director: Keith Lowry

Enquiries regarding this Data Privacy Policy

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