

Information Security and Privacy Policy

■ Purpose

Classys has established this policy to protect information assets securely and effectively, as well as to protect the personal data of customers, employees, and business partners who utilize Classys' products and services.

■ Scope of Application

This policy applies to Classys and its employees.

Classys shall encourage its business partners and their employees to comply with this policy or a similar level of policy.

■ Code of Conduct

- ① Employees shall be aware that they are the main agents of information security and continuously participate in information security education and training to improve the level of data protection.
- ② Employees shall internalize information security and institutionalize information security activities as part of the corporate culture.
- ③ The purpose of collecting personal data shall be clearly specified at the time of collection, and the personal data controller shall only process personal data within the necessary scope directly required to achieve the specified purpose.
- ④ Personal data shall be used within the scope of the purpose and choose methods that minimize invasion of the information subject's privacy.

■ Action Plans

- ① We shall establish and operate control procedures to manage security risks and conduct monitoring and review of data protection activities.
- ② We shall establish methods and criteria for identifying and evaluating risks to key information assets, and regularly conduct risk assessments.
- ③ In general, personal data processing matters such as the "Personal Data Processing Policy" shall be publicly disclosed, and reasonable procedures should be established to ensure the rights of information subjects, such as the right to access.
- ④ We shall conduct privacy protection education to enhance awareness among employees, including personal data handlers, and prevent the misuse and leakage of personal data.