

Data Protection Policy

Preamble

At Lebe Industrial Co., Ltd., we recognize the critical importance of protecting personal data and respecting the privacy rights of individuals. In an increasingly digital world, maintaining the confidentiality, integrity, and availability of personal information is fundamental to building trust with our employees, customers, suppliers, and partners.

This Data Protection Policy outlines our commitment to complying with applicable data protection laws, including the **Republic of Korea's Personal Information Protection Act (PIPA)** and the **EU General Data Protection Regulation (GDPR)**, where relevant. This policy reflects our broader commitment to ethical conduct, transparency, and responsibility, which are core values embedded in our **Code of Conduct** and **Code of Ethics**.

1. Our Commitment to Data Protection Principles

Lebe Industrial is committed to processing personal data in accordance with the following key principles:

- **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** We collect personal data for specified, explicit, and legitimate purposes and do not process it further in a manner that is incompatible with those purposes.
- **Data Minimization:** We ensure that personal data collected is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- **Accuracy:** We take all reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate personal data is erased or rectified without delay.
- **Storage Limitation:** We keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- **Integrity and Confidentiality (Security):** We process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

2. Scope of Application

This policy applies to all personal data processed by Lebe Industrial Co., Ltd. within our operations.

This includes personal data of:

- Our employees, former employees, and job applicants.
- Our customers and potential customers.
- Our suppliers, vendors, and business partners.
- Any other individuals whose personal data we may collect or process in the course of our business activities.

This policy applies regardless of where the data is stored or accessed.

3. Lawful Basis for Processing Personal Data

We will only process personal data if we have a valid lawful basis to do so, which may include:

- The data subject has given **consent** to the processing for one or more specific purposes.
- Processing is necessary for the **performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a **legal obligation** to which Lebe Industrial is subject (e.g., labor laws, tax laws).
- Processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.
- Processing is necessary for the performance of a task carried out in the **public interest** or in the exercise of official authority vested in Lebe Industrial.
- Processing is necessary for the purposes of the **legitimate interests** pursued by Lebe Industrial or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

4. Data Subject Rights

We respect the rights of individuals regarding their personal data. Where applicable, these rights include:

- The **right to be informed** about the collection and use of their personal data.
- The **right of access** to their personal data.
- The **right to rectification** of inaccurate or incomplete personal data.
- The **right to erasure** (also known as the 'right to be forgotten').
- The **right to restrict processing**.
- The **right to data portability**.
- The **right to object** to certain types of processing.

- Rights in relation to **automated decision-making and profiling**.

Individuals wishing to exercise these rights should contact Jooho Lee from technical sales department. We will respond to all legitimate requests in accordance with applicable data protection laws.

5. Data Security

Lebe Industrial implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including:

- **Access controls:** Limiting access to personal data to authorized personnel on a need-to-know basis.
- **Data encryption:** Where appropriate, encrypting personal data in transit and at rest.
- **Regular backups:** Ensuring data can be recovered in the event of a system failure or data loss incident.
- **Security awareness training:** Providing regular training to employees on data protection and security best practices.
- **Incident response plan:** Having procedures in place to detect, report, and investigate personal data breaches.
- **Physical security measures:** Protecting physical access to data processing facilities.

6. Data Transfers (International)

In cases where personal data needs to be transferred internationally (e.g., to cloud service providers or international partners), we will ensure that such transfers are carried out in compliance with applicable data protection laws. This includes, where required by GDPR, ensuring adequate safeguards are in place (e.g., Standard Contractual Clauses, Binding Corporate Rules, or adequacy decisions).

7. Roles and Responsibilities

- **Management:** Senior management is responsible for ensuring that Lebe Industrial complies with this policy and all applicable data protection laws.
- **All Employees:** Every employee is responsible for understanding and adhering to the principles of this policy and relevant data protection procedures in their daily work.

8. Data Breach Reporting

In the event of a personal data breach, Lebe Industrial will assess the risk to individuals and, where required by law (e.g., GDPR, PIPA), notify the relevant supervisory authorities and affected data subjects without undue delay.

9. Policy Review

This policy will be reviewed regularly (at least annually) and updated as necessary to ensure its continued relevance, effectiveness, and compliance with evolving legal requirements and best practices.



President

Sangsu Lee

3rd January 2025