

1. Introduction

- 1.1 Shanghai (China) Co., Ltd., PERSOLKELLY China Co., Ltd., PERSOLKELLY Shenzhen Co., Ltd., PERSOLKELLY Consulting (Shanghai) Co., Ltd., and PERSOLKELLY Consulting (Shenzhen) Co., Ltd. (collectively, the “**Company**”, “**we**”, “**us**”, “**our**”) respects your privacy and we acknowledge that you have certain rights related to any personal information we collect from you and we have certain obligations in respect of the same. The Company supports various international and local privacy laws and has procedures in place to meet the requirements of those laws.
- 1.2 This privacy policy (“**Privacy Policy**”) discloses and states our privacy principles and/or our practices for collecting, acquiring, storing, using and/or disclosing your personal information, so that you may know and understand how we may collect, use, disclose, process and share your personal information.
- 1.3 For the avoidance of doubt, “**personal information**” means any information (excluding anonymized information) recorded electronically or otherwise concerning any identified or identifiable natural person.

2. Information We Collect, Use or Disclose

- 2.1 In order for us to provide our services and operate our business, provide services of recruiting and placing individuals for potential labor dispatch (and related services) to our customers and/or directly at the Company, acting as the employer or hirer of record for individuals employed or engaged by the Company, or provide human resources related services to our customers, we must collect certain personal information from and about individuals who are candidates, employees, contractors, former employees, website users and visitors.
- 2.2 The types of personal information collected, used, processed, disclosed and stored by us depend on the circumstances in which and/or the purposes for which we may need to process personal information. Hence, subject to the aforesaid, such personal information may include:
- Name;
 - Contact information (address, phone number, e-mail address);
 - Identification details or passport;
 - Employee identification number;
 - Date of birth;
 - Contents of any other identification provided to the Company for application or employment purposes;
 - Education and employment history;
 - Work-related skills and experience;

- Professional credentials or licenses
- Membership in professional organizations;
- Any other information contained on an individual's Curriculum Vitae (CV);
- Citizenship and work authorization status;
- Disability and health-related information;
- Next-of-kin or emergency contact information;
- Information from and related to publicly published profiles you've created on job-related social media platforms and job boards (such as LinkedIn, Monster, or Indeed)
- Information provided by references; and
- Information regarding your career interests, preferences, and qualifications.

2.3 In addition, you acknowledge and agree that, under certain circumstances and consistent with prevailing laws, we may request types of personal information that are viewed by some countries as "sensitive":

- National identification, tax identification, passport number or social security number(s);
- Financial or bank account information;
- Results of drug, criminal, and/or background screenings;
- Benefits selections, potentially including health insurance and retirement planning information;
- Information contained within your personnel file with the Company, such as performance reviews, disciplinary action, and other payroll related information; and
- Health information, including that related to a work-related claim (e.g. workers' compensation claim)

2.4 In some jurisdictions, in order to comply with statutes, rules, and regulations pertaining to equal employment opportunities or to assist the Company or its related corporations in compiling data for its equal opportunities practices and reporting, we may also ask you to provide gender, race/ethnicity or disability information. The provision of this type of information will be voluntary, unless it is required by law, and failure to provide this information will not hinder your employment or project opportunities.

2.5 Your interactions with our websites may also result in the collection, processing, and storage of the following types of information from you:

- Geolocation data;
- Other information you may provide to us, such as through surveys, interactions with our social media, or other media used to contact the Company. You may change or turn off this on-going collection, processing, and storage function as described in the Internet browser support file or by disabling the function to accept and store cookies in your Internet browser settings.

2.6 Some of our websites require you to provide your personal information, such as when you create a profile and log-in credentials. Instead of having to type in your personal information, some of these functionalities

may allow you to use third-party authentication tools such as Facebook, Twitter, and Google to populate certain fields. By authenticating through one of the social media options, you allow us to receive your personal information and other information that is accessible through these tools. This information may be incorporated into your profile for the purposes set out in this Privacy Policy. For any such tool you choose to use, we encourage you to also review the tool provider's privacy policy and any terms and conditions.

- 2.7** We may use your personal information to permit you to participate in live social media feeds. If you choose to participate, your public username may be displayed on the sites along with your post, including, but not limited to, comments, images, and video.
- 2.8** We may provide you with access to third-party functionality that allows you to post content to your social media account(s). Any information that you provide to your social media account(s) through use of such thirdparty functionality is governed by the applicable third party's privacy policy, and not by this Privacy Policy. For the avoidance of doubt, we are not responsible for any personal information that you provide to such third party.
- 2.9** With respect to certain personal information you provided about other individuals (e.g., your close relatives, family members, and emergency contacts), it is your responsibility to make such individuals aware before you provide their personal information to the Company and to obtain their necessary consent.
- 2.10** We do not intend to directly collect, use or disclose information that may be considered sensitive about minors under the age of sixteen (16) and persons without civil capacity or with limited civil capacity. If we collect such information, it is purely accidental and not deliberate. We will comply with relevant laws and further obtain the consent of their legal guardian or delete such information upon the written request of their legal guardian.

3. The Purpose For Which We Collect, Use and Disclose Your Personal Data

- 3.1** We will/may collect, use, disclose and/or process your personal information for one or more of the following purposes:
 - a) administering, processing and/or dealing with any interactions between you and the Company and/or any of its related corporations including but not limited to any application by you for employment or work with the Company;
 - b) recruiting, assessing and/or matching you with/for potential positions or assignments with third party organizations (or our customers), and/or dealing with matters related thereto such as offering

- you a placement of work or job with such third party organizations (or our customers) or referring you for employment to a third party organization (or our customer);
- c) administering, managing and/or dealing with the provision of work or job placement services to you. This includes us sharing your personal information with our customers or third party organizations, for your potential placement or employment opportunities with those customers/third party organizations who are seeking employees or workers, or with the organization to which you have been assigned to work;
 - d) administering or terminating your employment and/or working relationship with us or with third party organizations (or our customers), including onboarding and training, employee benefits and remuneration management, performance review, personal or career development or disciplinary action matters;
 - e) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
 - f) administering, facilitating, processing and/or dealing in any matters relating to your use of any of the Company's or its related corporations' websites, any functionalities on the websites or any interactions or activities carried out by you on or through any of the Company's or its related corporations' websites, such as but not limited to live social media feeds;
 - g) monitoring, processing and/or tracking your use of any of the Company's or its related corporations' websites in order to provide you with a seamless experience, facilitating or administering your use of any of the Company's or its related corporations' websites, and/or to assist us in improving your experience in using any of the Company's or its related corporations' websites;
 - h) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering your use of any of the Company's or its related corporations' website or any interactions you have with us, or for the provision of our services to you. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal information about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
 - i) maintaining and preserving personal information and employment records of employees to comply with any laws and regulations or any document keeping or audit requirements;
 - j) dealing with entry and exit matter and/or work permit matters;
 - k) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations applicable to us, the requirements or guidelines of governmental authorities which we determine are applicable to us, and/or our risk management procedures that may be required by law or that may have been put in place by us;

- l) preventing or investigating any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflict of interests; or dealing with and/or investigating complaints;
- m) creating reports with respect to our interactions with you, and/or producing statistics and research of such interactions for internal and/or statutory reporting and/or recordkeeping requirements for us or our related corporation(s);
- n) complying with or as required by any applicable law, governmental or regulatory requirements of any jurisdiction applicable to us or our related corporations, including meeting the requirements to make disclosure under the requirements of any law binding on us or our related corporations, and/or for the purposes of any guidelines issued by regulatory or other authorities with which we or our related corporations are expected to comply;
- o) complying with or as required by any request or direction of any governmental authority which we are expected to comply with; or responding to requests for information from public agencies, governmental authorities, statutory boards or other similar authorities. For the avoidance of doubt, this means that we may/will disclose your personal information to the aforementioned parties upon their request or direction;
- p) storing, hosting, backing up (whether for disaster recovery or otherwise) your personal information, whether within or outside China,
- q) facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of the Company and/or its related corporations;
- r) responding to litigation proceedings, seeking legal rights and remedies, replying in arbitration or litigation proceedings, and administering any complaints or claims;
- s) carrying out and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves the Company and/or its affiliates as a participant, and there may be other third party organizations who are participants in such transaction. The term “**business asset transaction**” means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organization or a portion of an organization or of any of the business or assets of an organization.

(the purposes set out above shall be collectively referred to as the “**Purposes**”).

3.2 The Company may/will need to disclose or transfer your personal information to third parties, whether located within or outside China, for one or more of the above Purposes, as such third parties would be processing your personal information for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we may/are permitted to disclose or transfer your personal information to such third parties (whether located within or outside China) for one or more of the above Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal

information for one or more of the above Purposes. Without limiting the generality of the foregoing or of the immediately preceding paragraph setting out the Purposes, such third parties include:

- a) our associated or affiliated organizations or related corporations;
- b) any of our agents, contractors or third party service providers that process or will be processing your personal information on our behalf including but not limited to those which provide administrative or other services to us such as mailing houses, telecommunication companies, information technology companies, data centers, IT service providers, insurance companies and bank staff, etc.;
- c) our customers or third party organizations, who may be your potential employers or hirers or organizations which engage you for your services, etc.;
- d) third parties to whom disclosure by the Company of your personal information is for one or more of the Purposes and such third parties would in turn be collecting and processing your personal information for one or more of the Purposes;
- e) public agencies, governmental authorities, statutory boards and/or industry associations; and
- f) any potential asset acquirer of all or any part of the business of the Company, or any acquirer or equity subscriber in any merger or acquisition of the Company

3.3 Your consent pursuant to this Privacy Policy is additional to and does not supersede any other consents that you had provided to the Company with regard to processing of your personal information.

3.4 Data that has been anonymized does not personally identify you and is not covered by this Privacy Policy.

3.5 We hold our employees, agents, and suppliers accountable for maintaining the trust that you place in us with your personal information. Your personal information will not be used or shared except as in accordance with applicable law relating to personal information.

3.6 For the purpose of our business operations, we may appoint third party service providers to provide certain services or realize certain functions as may be directed by us. We will require the companies, organizations and individuals we appoint to process your personal information only to the extent as authorized by us, and not to use such information for any other purpose beyond the scope of authorization.

3.7 You acknowledge, agree and authorize that your personal information may be shared with third parties as set out in paragraph 3.2 above. If you would like to receive a list of recipients or more information regarding our sharing of your personal information, you may contact us in the manner set out in Section 8 below.

3.8 In accordance with paragraph 3.2 above, if we become subject to an acquisition or merger, we will require the party receiving your personal information to continue to comply with this Privacy Policy. Prior to any transfer of your personal information, we will send you an appropriate notice to advise the recipient's

company or individual name and contact details. If the recipient changes the Purpose or method of processing, we will require it to obtain your separate consent again.

- 3.9** Consistent with paragraph 3.2 above, as a result of the scope of the Company's operations, the sharing of your personal information with our other group entities, service providers, and customers may result in your personal information being sent to countries outside of your country of residence, which may have data protection laws that differ from those in your country of residence. Regardless of the source or destination location of your information, we will at all times protect your personal information as described in this Privacy Policy, and in accordance with applicable data protection laws when transferring your personal information. We will require the recipient to protect your personal information in accordance with the relevant personal information protection laws and regulations of the country where it is located, and to ensure that your personal information is accorded at least the same degree of protection outside China as it is accorded under the applicable laws within China. If you would like to receive more information regarding these cross-border transfers and protections, you may contact us in the manner set out in Section 8 below.

4. Cookies and Web Beacons

- 4.1** The Company's websites use "**cookies**" to help personalize the online experience. A cookie is a piece of data stored on the user's computer or mobile device tied to information about that user. They also allow us to identify those devices when they return to a website. You can set your browser to notify you before you receive a cookie, giving you the option of whether to accept it. You can also set your browser to turn off cookies. If you do so, some areas of our websites may not function properly. We use both session ID and persistent cookies. A session ID cookie simply expires once the user closes the browser. A persistent cookie is a small text file stored on the user's hard drive for an extended period of time. These can be removed by following the instructions in your Internet browser's help file.
- 4.2** To help us provide better service, we sometimes collect anonymous information from visits to our websites through the use of "**web beacons**." These do not access your personal information, but rather allow us to log users who have visited our websites. This anonymous information is sometimes known as "**clickstream data**." We or our vendors may use this data to analyze trends and statistics to help us provide better customer service. If you do not want your interaction details used in this manner, see the paragraph above on cookies.
- 4.3** Links: For links to organizations not affiliated to us, we are not responsible for the privacy practices or the content of such websites. We recommend you review the terms and conditions of use and privacy policies in place on such websites.

5. Your Rights and Choices

- 5.1** The amount of personal information you are required to supply when requesting our services will be limited to that which is relevant to and reasonable for the supply of such services or for the purposes for which such personal information is being collected.
- 5.2** Where you have asked us to do the following, or have otherwise given us your consent to do the following, we may periodically use your contact information to send you updates via email in order to alert you to promotional opportunities or services relevant to your interactions with us, such as jobs in our database that match your selected criteria. Each notification will provide instructions on how to opt out of receiving similar emails from the registered service or resource. At the point where we request personal information about you, our site also gives you the opportunity to decide which communications you wish to receive. The database is automatically updated with your preferences when you opt out. When your interactions with the Company have resulted in your registration for multiple services or resources it may be necessary to opt out from each service separately.
- 5.3** Additionally, you have the right to request access to, to withdraw your consent to the use and processing of, to request the correction of inaccuracies of, and to request the deletion of, personal information that the Company maintains about you, or that is in the Company's possession or under its control. Notwithstanding the foregoing, you understand that we reserve the right to refuse all or any part of your request by providing you with the reasons for our refusal within a reasonable time (e.g., when we can demonstrate that we have a legitimate need to process your personal information or where there is sufficient evidence to show that you are acting in bad faith or abusing your rights) where it is impossible or practically difficult for us to comply with your request. We may limit or deny requests for access or charge reasonable fees for access, in accordance with applicable law or requirements of governmental authorities.
- 5.4** Where you seek access to and/or seek to correct the personal information currently in our possession or control, we will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request.
- 5.5** We will process your request to withdraw your consent within a reasonable time from such a request being made, and will thereafter not collect, use and/or disclose your personal information in the manner stated in your request. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal information, it may mean that we will not be able to continue providing our services such as recruitment, placement, or employment, as the case may be.

6. Administration, Management, Protecting and Retaining Your Information

- 6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by the Company to make a decision that affects you, or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.
- 6.2 We will also put in place reasonable and appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, use of privacy filters, access control, password protection and disclosing personal data both internally and to our authorised third-party service providers and agents only on a need-to-know basis to prevent any unauthorized access, collection, use, disclosure, copying, modification, disposal, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.
- 6.3 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.
- 6.4 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

7. Data Breach Notification

- 7.1 In the event a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data, we shall promptly assess the impact and once assessed that it is a notifiable data breach, we shall report this breach to the relevant authority(ies) based on the Country data breach notification requirements. We will notify you when the data breach is likely to result in significant harm to you after our notification to the relevant authority(ies). We may also notify other relevant regulatory agencies, where required.
- 7.2 If we are a Data Intermediary, we shall inform the Data Controller (our clients) immediately of any data breach so they can promptly assess the impact and comply with their data breach notification obligation.

8. Updates to this Privacy Policy

We may update this Privacy Policy from time to time. If we change our Privacy Policy, we will post the revised version here, with an updated revision date.

9. How to Contact Us

If you have any questions, grievances or complaints, or comments about this Privacy Policy and/or the handling of your personal data by us, please contact our Data Protection Officer at:

Address: Unit 1201, Two ICC, No.999, Huaihai Road (M), Shanghai 200031 P.R.China

Attention: Mr. Yethon Lin

Email: yethon_lin@persolkelly.com

Please note that for any resumes or job applications sent to this mailbox will NOT be attended as this mailbox is solely for purposes of personal data protection related feedback. For submission of resumes or job applications, please send to us marketing_info@persolkelly.com, or visit our website at <https://www.persolkellycn.com/> for more details.

1. 隐私政策

1.1 上海必胜人力资源有限公司、英创人才服务（上海）有限公司、英创人力资源服务（深圳）有限公司、英创安众企业管理咨询（上海）有限公司和英创安众企业管理咨询（深圳）有限公司（以下统称为“公司”）尊重您的隐私，并且我们承诺，对于我们 从您这里收集的个人信息，您拥有特定的权利，同时我们对此类信息承担特定的义务。 公司支持各种国际和本地的隐私法律，并已实施相应程序以满足这些法律的要求。

1.2 本隐私政策（“**隐私政策**”）旨在向您披露和说明我们在收集、获取、存储、使用和/ 或披露您的个人信息时所遵循的隐私原则和/或规范，使您知悉并了解我们收集、使 用、披露、处理和共享您的个人信息的方式。

1.3 为免生疑问，特此明确，“**个人信息**”指有以电子或者其他方式记录的与已识别或者可 识别的自然人有关的各种信息（不包括匿名化处理后的信息）。凡提及“**我们**”之处均 指公司。

2. 我们收集、使用或披露的信息

2.1 我们需要向候选人、员工、合同工、前雇员、网站用户和访客收集关于他们的某些个 人信息，以便我们提供 服务和经营业务，包括向客户或直接由我们公司作为雇主或记 录在案雇佣或聘用的个人提供潜在工作岗位的招聘 和劳务派遣（及相关服务），或向 客户提供人力资源相关服务。

2.2 我们收集、使用、处理、披露和存储哪些个人信息类型，取决于我们需要在什么情况 和/或目的下处理个 人信息。因此，在上述前提下，相关个人信息可能包括：

- 姓名；
- 联系方式（地址、电话号码、电子邮件地址）；
- 国籍、民族、种族或其他身份信息；
- 员工工号；
- 性别、年龄、出生日期；
- 为申请或雇佣目的而提供给公司的任何其他身份证明的内容
- 教育和工作经历；
- 工作相关的技能和经验；
- 职业资格证书或执照

- 专业机构的会员证明；
- 个人简历中包含的任何其他信息；
- 背景调查的结果；
- 公民身份或工作授权状态；
- 行为能力和健康相关信息；
- 您提交的或我们获得的与因休假、患病或其他原因导致您缺勤相关的信息；
- 亲属或紧急联系人信息；
- 来自您在就业相关的社交媒体平台和求职网站（比如 LinkedIn、Monster 或 Indeed）上创建的公开资料的信息和与之相关的信息；
- 推荐人提供的信息等；
- 关于您的职业兴趣、偏好和资历的信息。
- 您在公司的个人档案中包含的信息，比如绩效评估、纪律处分以及其他工资相关信息等。

2.3 此外，您确认并同意，在特定情况下，遵守现行法律，我们可以要求获得被部分国家视为“敏感”数据的个人信息：

- 身份证号、税务识别号、护照号和/或社会保障号；
- 宗教信仰；
- 财务或银行账户信息；
- 关于药物、犯罪记录调查的结果；
- 生物特征数据、基因信息和指纹；
- 身体特征（例如视力、身高及体重）；
- 健康信息，包括病例、治疗记录、职业健康（比如工伤记录）。

2.4 在某些司法辖区，为了遵守平等就业机会的条例、制度和法规或帮助公司或与公司相关的企业汇总整理平等机会实践与报告的数据，我们也可能要求您提供性别、种族/民族或行为能力情况信息。除非法律要求，否则提供上述信息属于自愿行为，未提供上述信息不会妨碍您获得工作或项目机会。

2.5 如果您浏览我们的网站时有过互动，我们也可能因此从您这里收集、处理和存储下列类型的信息：

- 地理位置数据；
- 您可能提供给我们的其他信息，比如调查问卷、与我们社交媒体的互动，或曾使用过的用于联系公司的其他媒体途径等。您可以按照互联网浏览器帮助文件中的说明，或通过禁用互联网浏览器设置中的接受和存储 cookies 的功能，变更或关闭此类持续收集、处理和存储的功能。

- 2.6** 我们的部分网站需要您在创建个人资料和登录凭据等情况时提供个人信息，其中部分功能无需键入个人信息，只需使用第三方身份验证工具（比如 Facebook、Twitter 和 Google）便能填写某些字段。通过其中一种社交媒体进行身份验证，我们便能通过这些工具收到您的个人信息和其他信息。我们可能将这些信息合并入您的个人资料中，用于本隐私政策列明的目的。对于您选择使用的此类工具，我们建议您也要检查工具提供方的隐私政策以及条款和条件。
- 2.7** 我们可能使用您的个人信息以给予您实时参与社交媒体信息交流的许可。如果您选择参与，您的公开用户名可能和您发布的内容（包括但不限于评论、图片和视频）一起展示在网站上。
- 2.8** 我们可能会为您提供访问第三方功能的权限，允许您将内容发布到您的社交媒体帐户。您通过第三方功能提供给社交媒体账户的任何信息须遵循相关第三方的隐私政策，不受本隐私政策制约。为免生疑问，特此明确，我们对您提供给第三方的任何个人信息不承担任何责任。
- 2.9** 对于您提供的其他个人（例如您的近亲、家庭成员、紧急联络人）的某些个人信息，您有责任在向公司提供他们的个人信息之前让该等个人知晓，并负责取得该等人员的必要同意。
- 2.10** 我们无意向十六（16）岁以下的未成年人和无民事行为能力人或限制民事行为能力人直接收集、使用或披露可能被视为敏感的信息。如果收集了此类信息，则完全出于偶然，绝非故意为之，我们将遵守相关法律规定，并进一步征得其法定监护人的同意，或在其法定监护人书面要求时删除此类信息。

3. 我们收集、使用和披露个人信息的目的

- 3.1** 我们将/可能出于下述一个或多个目的收集、使用、披露和/或处理您的个人信息：
- a) 管理、处理和/或跟进您与公司和/或公司的任何相关企业之间的任何交互，包括但不限于您向公司申请雇佣或工作机会；
 - b) 为您发布、评估和/或匹配第三方组织（或我们的客户）的潜在职位或岗位，和/或处理与之相关的事项，比如向您提供该第三方组织（或我们的客户）的岗位或工作，或向第三方组织（或我们的客户）推荐您应聘；
 - c) 管理和/或处理为您提供工作或就业服务的事宜。其中包括我们与客户或第三方组织共享您的个人信息，以便您有机会获得正在招聘员工或工作人员的客户/第三方组织的潜在就业或雇佣机会，或者与您被派驻服务的组织共享您的个人信息；

- d) 管理或终止您与我们或第三方组织（或我们的客户）的劳动和/或工作关系，包括入职和培训、员工福利和薪酬管理、绩效考核、个人和职业发展或纪律处分事宜；
- e) 执行您的指示或回应任何由您或代表您（或声称由您）提出的任何询问；
- f) 管理、促进、处理和/或跟进任何关于您使用公司或其相关企业的网站的事项，指由您或通过本公司及其相关企业网站所执行的任何功能、交互、活动，包括但不限于实时社交媒体订阅；
- g) 监控、处理和/或跟踪您使用公司或其相关企业网站的情况，从而为您在使用公司或其相关企业网站时提供无缝体验或便利，便于管理，和/或帮助我们优化公司或其相关企业网站的使用体验；
- h) 通过电话/语音通话、短信和/或传真、电子邮件和/或邮政信件与您联系或沟通的目的是为了管理您使用公司或其相关企业的网站或与我们的任何交互，或为了向您提供服务。您确认并同意，此类沟通的途径可以包括向您邮寄信件、文件或通知，为了递送上述信息可能会涉及披露您的某些个人资料，包括在信封/邮件包裹上。
- i) 维护、保存员工的个人信息和受聘记录，以遵守任何法律法规或与文件保存有关的任何要求或审计要求；
- j) 处理出入境相关事宜和/或工作许可事宜；
- k) 根据适用的法律法规义务及我们认为适用的政府机构要求或指南，和/或法律规定的或我们实施的风险管理程序，开展尽职调查或其他筛查活动（包括背景调查）；
- l) 预防或调查任何欺诈、非法活动、不作为或不当行为（不论是否存在对前述活动的怀疑），处理利益冲突，或处理和/或调查投诉情况；
- m) 创建我们与您的交互报告，和/或编制公司内部和/或法定申报需要的和/或备案要求我们的或其相关企业等交互的统计资料和研究报告；
- n) 遵守或执行适用于我们或其相关企业的任何司法辖区的适用法律、政府的或监管的要求，包括遵守对我们或其相关企业有约束力的法律所规定的披露要求，和/或遵守监管或其他机构发布的我们或其相关企业应当遵守的任何指南；
- o) 遵守或执行任何政府机构提出的我们应当遵守的任何要求或指示；或回应来自公共机构、政府部门、法定机构或其他类似机构的信息请求。为免生疑问，这意味着我们可能/将会按照前述各方的要求或指示披露您的个人信息；
- p) 存储、托管、备份（出于灾难恢复或其他目的）您的个人信息，不论是在中国境内还是境外；
- q) 促进、处理和/或管理公司和/或其相关企业的外部或内部审计；
- r) 回应诉讼程序，寻求法定权利和法律救济，开展仲裁、诉讼答辩以及管理任何投诉或索赔；
- s) 进行和/或推进公司和/或其关联方已参与并且可能有其他第三方组织参与的业 务资产交易或潜在业务资产交易。“**业务资产交易**”指购买、出售、出租、兼 并或合并或以其他方式获得、处置或资助某个组织 或其一部分，或某个组织的 任何业务或资产。（上述目的统称为“目的”）；

3.2 公司可能/会需要出于上述一个或多个目的向第三方（不论是在中国境内还是境外）披露或传输您的个人信息，因为该第三方将为上述一个或多个目的处理您的个人信息。对此，您特此确认并同意我们可以/被允许出于上述一个或多个目的向该第三方（不论是在中国境内还是境外）披露或传输您的个人信息，以便其后续为上述一个或多个目的收集、使用、披露和/或处理您的个人信息。在不限制前述规定或上段对目的做出规定的一般性前提下，该第三方包括：

- a) 我们的关联组织或相关企业；
- b) 目前或将来代表我们处理您的个人信息的代理人、承包商或第三方服务提供商，包括但不限于向我们提供行政或其他服务的个人或机构，比如邮政公司、电信公司、信息技术公司、数据中心、IT服务提供商、保险公司和银行工作人员等；
- c) 可能成为您潜在雇主的客户或第三方组织，或聘请您提供服务的组织等；
- d) 公司出于一个或多个目的而向其披露您的个人信息的第三方，且该等第三方也将为了一个或多个目的收集和/或处理您的个人信息；
- e) 公共机构、政府部门、法定机构和/或行业协会；
- f) 任何公司全部或部分的业务的潜在资产收购方、或在公司的并购、收购中的收购方或者股权认购方。

3.3 根据本隐私政策，您的授权是您在处理您的个人信息时向公司提供的任何其他授权的补充，并不取代任何其他授权。

3.4 已匿名化的数据不会显示您的个人身份，不在本隐私政策范围内。

3.5 我们要求我们的员工、代理人和供应商负责建立您将个人信息存放在我们这里的信任。您的个人信息将只能按照关于个人信息的适用法律使用或共享。

3.6 出于业务运营需要，我们可能会委托第三方服务提供商根据我们的指示提供某些具体的服务或实现特定的功能。对我们委托处理个人信息的公司、组织和个人，我们会要求其仅在授权范围内处理您的个人信息，不得将此信息用于其他任何超出委托范围的目的。

3.7 您确认、同意并授权我们可以按照上文第 3.2 条规定将您的个人信息与第三方共享。如您想取得对象名单和更多关于分享您个人信息的信息，您可以通过下述第 8 条的规定与我们联系。

3.8 按照上文第 3.2 条规定，鉴于公司的经营范围，与我们的其他集团实体、服务提供商和客户共享您的个人信息可能导致您的个人信息被发送至您居住国以外的其他国家，在这些国家可能有不同于您居住国的数据

保护法 律。不论您的信息来源或目的地如何， 我们将始终按照本隐私政策并按照适用的数据保护法律的规定传输您的个人 信息。我 们将要求该等接受方依据其所在国的关于个人信息保护的法律法规规定保护您的个人 信息，同时也 要求该等接受方保证您的个人信息在中国境外所受到的保护至少与在中 国境内适用法律下所受到的保护程度相 同。如您想取得这些跨境传输方式和防护措施的更多信息，您可以通过下述第 8 条的规定与我们联络。的或方法，我们将要求其再 次获得您的单独的同意。

4. COOKIES 和网站 BEACONS

4.1 公司网站使用“**cookies**”来帮助实现个性化线上体验。**Cookie** 是一段存储于用户 计算机或移动设备上与该用户信息关联的数据。通过 **cookies**，我们还可以识别再次 返回网站的设备。您可以将您的浏览器设置成在接收 **cookie** 前先通知您，使您可以选 择是否接受。您也可以将您的浏览器设置成关闭 **cookies**。如果您选择关闭，我们网 站的部分内容可能无法正常运行。我们使用会话 ID **cookies** 和持续 **cookies**。用户关 闭浏览器后，会 话 ID **cookie** 即终止。持续 **cookie** 是一个存储于用户硬盘驱动器上很 长一段时间的的小的文本文件。可以按照 您的互联网浏览器帮助文件中的说明将上述 **cookies** 删除。

4.2 为了帮助我们更好的服务，我们有时会利用“**网站 beacons**”从网站的访问活动中收集 匿名信息。网站 **beacons** 不会访问您的个人信息，只是可以让我们记录哪些用户访问了 我们的网站。该匿名信息有时被称为“**点 击流数据**”。我们或我们的供应商可以使用该 数据分析趋势和统计信息，进而帮助我们提供更好的客户服务。如 果您不希望您的交 互信息被这样使用，请参照上段关于 **cookies** 的规定。

4.3 链接：对于与我们无关的组织的链接，我们对该类网站的隐私行为或内容不承担任 何责任。我们建议您查 阅 该类网站上的使用条款与条件以及隐私政策。

5. 您的权利和选择

5.1 在寻求我们提供服务时，您需要提供的个人信息仅限于与提供相关服务或收集个人 信息目的相关的合理的信息。

5.2 如果您需要我们通过电子邮件向您发送最新资讯，或以其他方式表示同意我们这样 做，我们可能会定期使用您的联系信息通过电子邮件向您发送最新信息，以便提醒您 注意与我们的互动相关的促销机会或服务，比如我 们数据库中与您选择标准匹配的 工作。每个通知中均会说明如何退订注册服务或资源的类似电 子邮件。我们在 要求获 得您的个人信息时，您也可以选择希望收到的通信方式。当您选择不再接收时，

数据库将根据您的偏好自动更新。如果您与公司的互动让您注册了多项服务或资源，可能需要分别退订每项服务。

5.3 此外，您有权要求访问，撤回对使用和处理的授权，要求更正不正确之处以及要求删除公司可能保留的、拥有的或掌握的有关您的个人信息。尽管如此，您理解如果我们无法或实际操作上难以按照您的上述要求行事，我们有权拒绝您的全部或部分请求，并仅需于合理时间内向您说明拒绝理由（例如，当我们可以证明我们有合法要求来处理您的个人信息时，或有充分证据表明您存在主观恶意或滥用权利的）。根据适用的法律或政府机构的要求，我们可以限制或拒绝访问请求或收取合理的访问费用。

5.4 如果您希望访问和/或修改目前由我们拥有或掌握的个人信息，我们需要您提供充足的信息，以确认您的身份以及请求的性质，才能处理您的请求。

5.5 如果您提出了撤销授权的要求，我们将在合理的时间内处理您的要求，然后按照您的要求，不再收集、使用和/或披露您的个人信息。但是，撤销授权可能导致某些法律后果。对此，根据您撤销我们可以处理您个人信息授权范围的程度，可能意味着我们无法继续向您提供招聘、派遣或雇佣（视情况而定）等服务。

6. 管理、保护和保留您的信息

6.1 如果您的个人信息可能将被公司用于一个影响您的决策或披露给其他组织时，我们会采取合理的努力措施，确保您的个人信息准确完整。但是，这意味着如果您最初提供给我们的个人信息有任何变更，您也必须告知我们；如果没有告知我们，我们对由此产生的不准确或不完整的个人信息不承担任何责任。

6.2 我们也会实施合理及适当的管理，应用物理和技术措施，如最新的防病毒保护、加密、使用隐私过滤器、访问控制、密码保护以及仅在需要了解的基础上，在内部和向我们授权的第三方服务供应商和代理人披露个人数据，以防止任何未经授权的访问、收集、使用、披露、复制、修改、处置、泄漏、损失、损坏和/或更改您的个人数据。但是，我们对由于完全无法控制的因素导致的第三方擅自使用个人信息的行为不承担任何责任。

6.3 您应当了解，位于互联网之上的传输方以及电子存储方式均非完全安全的。虽不能保证完全安全，但我们努力保护您的信息安全，并不断审查和加强我们的信息安全保障措施。

- 6.4 我们也会迅速采取措施将我们拥有或掌握的您的个人信息尽快销毁和/或匿名化，只要 1) 可以合理认为(i) 收集个人信息的目的对保留该类个人信息不再有用，且(ii) 不再需要为任何其他法律或商业目的保留个人信息； 2) 根据适用法律的要求；或 3) 您根据上文第 5.5 条的规定撤销授权。您确认并同意，为满足某些法律或商业目的的需要，我们可以匿名化您的敏感信息。

7. 数据泄漏的报告

- 7.1 如果安全漏洞导致个人数据被意外或非法破坏、丢失、更改、未经授权被披露，我们将及时评估其影响。一旦评估为应申报的数据泄露，我们将根据国家数据泄露通知要求向有关当局报告该漏洞。当数据泄露可能对您造成重大损害时，我们会在通知相关机构后通知您。我们也可能在需要时通知其他相关监管机构。
- 7.2 如我们作为数据的传输中介，我们将立即通知数据控制者（我们的客户）任何数据泄露的有关情况，以便他们能够及时评估影响并遵守其数据泄露通知义务。

8. 隐私政策的更新

我们可能不定期更新本隐私政策。如果我们变更了隐私政策，将在此处发布修改后的版本，并注明更新版本的日期。

9. 联系方式

如果您有任何关于本隐私政策和/或我们如何处理您的个人信息的问题、不满、投诉或意见，请通过下列方式联系我们：

地址：中国上海市淮海中路 999 号环贸广场二期 1201 室

电子邮件：Mr. Yethon Lin (yethon_lin@persolkelly.com)

Please note that for any resumes or job applications sent to this mailbox will NOT be attended as this mailbox is solely for purposes of personal data protection related feedback. For submission of resumes or job applications, please send to us marketing_info@persolkelly.com, or visit our website at <https://www.persolkellycn.com/> for more details.