

CHINA PERSONAL INFORMATION NOTICE FOR EMPLOYEES AND JOB CANDIDATES

中国员工和求职者隐私通知

We are committed to protecting the privacy, confidentiality and security of the personal information we hold by complying with the requirements of China's Personal Information Protection Law ("PIPL") and other applicable laws and regulations. We are equally committed to ensuring that all our employees and agents uphold these obligations.

我们致力于通过遵守《中华人民共和国个人信息保护法》（“《中国个人信息保护法》”）和其他适用法律和法规的要求，保障个人信息的隐私性、保密性和安全性。我们亦致力于确保我们的全体员工和代理均能遵守该等要求。

This China Personal Information Notice for Employees and Job Candidates (this "**notice**") explains what information we gather about you, what we use that information for, the lawful basis on which that information is used and who we give that information to. It also sets out your rights in relation to your information and who you can contact for more information or queries.

本《中国员工和求职者隐私通知》（本“**通知**”）阐明了我们收集的关于您的信息、我们使用该等信息的目的、使用该等信息的法律依据，以及我们会向谁提供该等信息。本通知亦规定了您关于您的信息的权利，以及您可获取更多信息或提出问询的联系信息。

1. What this notice covers and who it applies to

本通知涵盖的内容及其适用范围

- To run our business, we collect and use information about living individuals (also known as "**personal information**"), including information about our prospective, current and former employees.

为了经营我们的业务，我们会收集和使用关于在世个人的信息（即“**个人信息**”），包括关于我们潜在员工、在职员工与离职员工的信息。

- This notice applies to you if you have a current or past employment or service relationship with a China affiliate of the Jardine Matheson Group ("**we**", "**our**", or "**us**"). We will act as a personal information handler (as used and defined under PIPL) with respect to the personal information about you as an employee or a staff (including but not limited to those who are employed by a third-party staffing agency and are dispatched to work for us) (hereinafter referred to as the "**employee**").

如果您目前或曾经与怡和洋行集团的中国关联机构（“**我们**”或“**我们的**”）存在雇佣或服务关系，则本通知适用于您。我们会作为个人信息处理者（其定义详见《中国个人信息保护法》）处理关于您作为雇员或员工（包括但不限于受雇于第三方劳务派遣机构并被派遣为我们工作的人员）（下称“**员工**”）的个人信息。

- This notice also applies to you if you (hereinafter referred to as the "**job candidate**"), directly or through an employment agency, submit personal information to us in order to apply for a job position, for which we will also act as a personal information handler.

如果您（下称“**求职者**”）直接或通过职业介绍机构向我们提交个人信息以申请工作岗位，则本通知亦适用于您。我们亦会作为个人信息处理者处理您的个人信息。

- Solely for the purpose herein, “China” refers to the mainland of the People’s Republic of China and does not include Hong Kong, Macau and Taiwan.

仅为本通知之目的，“中国”指中华人民共和国大陆地区，不包括香港、澳门和台湾。

- If you have any questions or comments about this notice, please contact privacy@jardines.com.

如果您对本通知有任何问题或意见，请发送电子邮件至 privacy@jardines.com 与我们联系。

2. What information we collect

我们收集的信息

For employees, we collect basic identification information, such as your name, title, position, professional history, experience and contact details about you and, where relevant, your family. We usually also collect:

对于员工，我们会收集基本的身份识别信息，例如您的姓名、职称、职位、工作经历、经验，以及您和您的家庭成员（如有需要）的联系信息。通常，我们还会收集以下信息：

- Detailed identification information (e.g. in addition to name, position and title mentioned above, the employee’s nationality, gender, date of birth, profile picture, citizenship status (户口), ID card, passport numbers and other national ID numbers and details as required, private email, private phone number and permanent and current residence address);

详细的身份识别信息（例如，除上述提到的姓名、职位和职称信息之外，还包括员工的国籍、性别、出生日期、个人照片、户口、身份证号码、护照号码和其他所需的官方身份证件号码及其详细信息、私人电子邮件地址、私人电话号码、户籍地址和目前居住地址）；

- Electronic identification data (e.g. email address, login information, access rights, badge number, IP address, online identifiers/cookies, log files, connection time, sound or image recordings such as CCTV or voice recordings, business email content, business documents and business communication contents and similar data generated by you, other computer usage information related to your use of company equipment, systems and other resources, internet usage data, etc.); please note that you should have no expectation of privacy when using company equipment, systems and other resources;

电子身份识别信息（例如电子邮箱地址、登录信息、访问权限、工作证编号、IP 地址、在线标识符/cookies、日志文件、连接时间、声音或影像记录（例如闭路电视录像或录音）、业务电子邮件内容、业务文件和业务沟通内容，以及由您生成的其他类似信息、其他与您使用公司设备、系统及其他资源相关的计算机使用信息、互联网使用信息等）；请注意，当您使用公司设备、系统及其他资源时，您不应享有隐私有任何期望；

- Information about your family (e.g. marital status, marriage certificate, details of child(ren), spouse or partner, parents and/or other dependents, emergency contact information);

关于您的家庭的信息（例如婚姻状况、婚姻证明、子女、配偶或伴侣、父母和/或其他受养人的详细信息、紧急联络人信息）；

- Education and employment information (e.g. remuneration, bonus, insurance and other benefits information, employment dates such as dates of hiring/promotion/position change,

performance evaluation, position information such as position title and reference number, attendance information including where relevant, visa or work permit details, illness or leaves of absence for medical reasons, language skills, social security and housing fund information, death certificates and powers of attorney, recruitment information including job applications, CVs, job history and references, proof of termination of employment); and

教育和就业信息（例如薪酬、奖金、保险和其他福利信息、例如入职/晋升/职位变动日期等的就业日期、绩效评估、例如职位名称及编号等的职位信息、出勤信息、签证或工作许可证详情、疾病或因病请假的情况、语言技能、社会保险和住房公积金信息、死亡证明和授权书、招聘信息（包括求职申请、简历、工作经历和推荐信）、离职证明）；以及

- Financial information (e.g. bank account details, professional credit card numbers and tax-related information including tax resident details for compliance with tax regulations).

财务信息（例如银行账户详情、专业信用卡号码，以及为遵守税收法规目的收集的税务相关信息（包括税务居民详情））。

For job candidates, we usually collect:

对于求职者，我们通常会收集以下信息：

- basic identification information (e.g., name, gender, nationality, citizenship status (户口), email address and phone number);

基本的身份识别信息（例如姓名、性别、国籍、户口、电子邮箱地址和电话号码）；

- education and employment information (e.g., education background, professional qualifications, language skills, copies of education and profession certificates, recruitment information including job applications, CVs, job history and references, proof of termination of employment, visa or work permit details);

教育和就业信息（例如教育背景、专业资质、语言技能、教育和职业证书的副本、招聘信息（包括求职申请、简历、工作经历和推荐信）、离职证明、签证或工作许可证详情）；

- background check information (including health and criminal checks and screening) to the extent permitted by applicable law; this information is usually collected through a qualified employment agency or health examination center or publicly available sources as needed to support the recruitment process;

在适用法律允许的范围内，背景调查信息（包括体检和犯罪记录查询和筛选）；这些信息视需求通常经由具备资质的职业介绍机构或体检中心收集或者从公开渠道收集，以便支持招聘流程；

- electronic identification data (if you visit our company websites or WeChat platform for job postings, we may collect information such as IP address, online identifiers/cookies, log files and connection time; if you attend job interviews either onsite or online, we may collect sound or image recordings such as CCTV or voice recordings); and

电子身份识别信息（如果您访问我们公司的网站或微信平台查看招聘信息，我们可能会收集例如 IP 地址、在线标识符/cookie、日志文件和连接时间等的信息；如果您参加现场或在线的面试，我们可能会收集声音或影像记录（例如闭路电视录像或录音））；以及

- other information that you may provide, e.g., personal interests.

您可能提供的其他信息，例如个人兴趣爱好。

In some cases, the personal information that we process will also include sensitive personal information, such as your national ID and passport numbers, bank account numbers, diversity-related information (including data about racial and ethnic origin, political opinions or affiliation, religious beliefs and other beliefs of a similar nature, trade union membership and data about sexual life and sexual orientation), health data (such as sickness records, disability records, health examination reports, fitness for work records and information on work injuries and/or health insurance where it contains data relating to sickness), data about alleged or proven criminal offences in each case where permitted by law and sound or image recordings such as CCTV or voice recordings (if considered as biometric information under applicable law). The personal information about children under the age of fourteen (14) is also regarded as sensitive personal information. In each case, we collect sensitive personal information for specific purposes for which such information is required.

在某些情况下，我们处理的个人信息包括敏感个人信息，例如您的身份证和护照号码、银行账户号码、与多元化有关的信息（包括有关种族和民族、政治观点或党派、宗教信仰和其他类似性质的信仰、工会会员身份及有关性生活和性取向的信息）、医疗信息（例如疾病记录、残疾记录、体检报告、工作适应性记录及包含疾病相关信息的工伤和/或医疗保险信息）、在法律允许的情况下有关被指控或证实的刑事犯罪的信息，以及声音或图像记录（例如闭路电视录像或录音）（如果适用法律视其为生物识别信息）。十四（14）周岁以下儿童的个人信息亦被视为敏感个人信息。在每种情况下，我们仅会为需要此类信息的特定目的收集敏感个人信息。

Where applicable, for employees, we also collect more detailed information about your family (e.g. your child(ren), spouse or partner, parents and/or other dependents). Before providing us with any such information, you must inform the relevant individuals that you will disclose their personal information to us and provide a copy of this notice to them.

在适用的情况下，对于员工，我们还会收集关于您的家人（例如您的子女、配偶或伴侣、父母和/或其他受养人）的更多详细信息。在向我们提供此类信息之前，您必须告知相关个人您将向我们披露其个人信息，并向其提供本通知的副本。

In some cases, the personal information we collect from you is needed to meet our legal or regulatory obligations or to perform our obligations under your employment contract (or to enter into that contract). If so, we will indicate to you that the provision of this information is mandatory and the consequences if we cannot collect this information.

在某些情况下，我们需要向您收集个人信息，以履行我们的法律或监管义务或履行我们在您的劳动合同项下的义务（或签订该合同）。在这些情况下，我们会告知您提供这些信息是必须的，并告知我们无法收集这些信息的后果。

In some cases, we will also collect personal information about you indirectly from our service providers (e.g. recruiters and third parties who perform background checks for us), other employees (for example in any complaints submitted about you), and from publicly available sources such as business and employment oriented social networking services (such as LinkedIn and 51job.com) and jobs boards.

在某些情况下，我们亦会从我们的服务提供商（例如猎头和为我们进行背景调查的第三方）、其他员工（例如提交任何有关您的投诉），以及从职业社交网络平台（例如 LinkedIn 和 51job.com）和招聘网站等的公开渠道间接收集关于您的个人信息。

3. How we use information about you

我们如何使用您的信息

We process personal information of employees to:

我们处理员工的个人信息用于下列目的：

- undertake staff evaluation and promotion activities, such as determining the suitability of an employee's qualifications for a new role;

进行员工评估和晋升流程相关工作，例如确定员工的资质是否适合新职位；

- administer, plan and manage our personnel (including task, benefits and absence management, succession planning, staff turnover, individual income tax withholding and deduction, employee participation programmes, employee events/leisure activities, mobility);

规划和管理我们的员工（包括工作职责、福利和缺勤管理、继任计划、人员流动、个人所得税代扣代缴、员工参与计划、员工活动/休闲活动、流动性）；

- assist us in managing external providers (e.g. insurance companies, etc.) and benefitting from their goods and services;

协助我们管理外部供应商（例如保险公司等）并接受他们的货物和服务；

- train our staff;

培训我们的员工；

- manage our payroll bonus compensation schemes and further bookkeeping obligations;

管理我们的薪酬、奖金和酬劳计划，以及进一步的记账义务；

- manage our HR records, carry out performance reviews and satisfaction surveys, manage and investigate our employees' activities in the workplace (including compliance with internal policies) and manage any disciplinary actions and complaints;

管理我们的人力资源记录、进行绩效评估和满意度调查、管理和调查我们的员工在工作场所的活动（包括遵守内部规章制度情况）并处理任何纪律处分和投诉；

- manage our IT resources, including infrastructure management and business continuity;

管理我们的 IT 资源，包括基础设施管理和业务连续性管理；

- satisfy applicable legal or regulatory requirements;

遵守适用的法律或监管要求；

- respond to requests from, and other communications with, competent public or judicial authorities;

响应有管辖权的行政或司法机关的请求和其他沟通；

- meet our corporate social responsibility objectives; and

实现我们的企业社会责任目标；以及

- enable a transfer to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of the Jardine Matheson Group's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it.

就怡和洋行集团部分或全部业务或资产或任何相关权利或权益的实际或潜在转让或合并，或为收购业务或与之进行合并之目的，向潜在的买方、受让方、合并方或卖方及上述各方的顾问传输您的个人信息。

We process personal information of job candidates to:

我们处理求职者的个人信息用于下列目的：

- evaluate the suitability of a job candidate for the role, conduct pre-employment screening and verification of information provided by the job applicant and/or make arrangement for the job applicant's potential employment (such as supporting the job applicant's work visa application or citizenship status (户口) relocation);

评估求职者是否适合该职位、进行员工雇前背景调查和核实求职者提供的信息和/或为求职者的潜在雇用作出安排（例如为求职者的工作签证申请或户口迁移提供支援）；

- administer and improve our recruitment and employment process;

管理和改善我们的招聘和雇佣流程；

- satisfy applicable legal or regulatory requirements; and

遵守适用的法律或监管要求；以及

- respond to requests from, and other communications with, competent public or judicial authorities.

响应有管辖权的行政或司法机关的请求和其他通信。

4. The legal grounds we use for processing personal information

我们处理个人信息的法律依据

We generally use your personal information for the purposes outlined above because:

我们通常基于以下依据将您的个人信息用于上述目的：

- you consent to the processing;

您同意该等处理；

- for employees, the processing is necessary to conclude an employment contract with you or perform our contractual obligations towards you, such as when we make salary payments to you;

对于员工，该等处理对于与您订立劳动合同或履行我们对您的合同义务是必需的，例如向您支付工资；

- for employees, the processing is necessary to implement HR administration in accordance with lawfully formulated employment policies and rules;

对于员工，该等处理是按照依法制定的劳动规章制度和规定实施人力资源管理所必需的；

- the processing is necessary to comply with our legal or regulatory obligations, such as tax withholding requirements;

该等处理对于履行我们的法律或监管义务是必需的，例如代扣代缴税款的要求；

- the processing is necessary to protect the vital interests of the relevant individual or of another natural person, such as providing disability access to places of work;

该等处理对于保护相关数据主体或其他自然人的重要利益是必需的，例如在工作场所提供无障碍通道；

- the processing is necessary for the performance of a task carried out in the public interest, such as monitoring of the diversity of our workforce to the extent permitted by law; or in some cases, where we have obtained your prior consent; and/or

该等处理对于执行涉及公众利益的工作是必需的，例如在法律允许的范围内监测我们员工多样性的程度；或在某些情况下，我们已就该等处理获得您的事先同意；和/或

- the personal information has been lawfully made public and the processing of such information is to a reasonable extent in accordance with the law.

个人信息已经合法公开并且依法在合理的范围内处理该等信息。

5. Who we disclose your personal information to

我们向谁披露您的个人信息

5.1 Within the Jardine Matheson Group

怡和洋行集团内部

We may transfer personal information to members of our personnel and other companies in the Jardine Matheson Group to complete the purposes indicated in section 3 above. Such other companies of the Jardine Matheson Group will either act as another personal information handler under this notice or will only process personal information on behalf and upon request of the personal information handler.

为上述第 3 节中所示之目的，我们可能会将个人信息传输至我们的员工和怡和洋行集团的其他公司。怡和洋行集团的关联机构可能作为个人信息处理者处理个人信息，或者作为受托人仅按照个人信息处理者的指示处理个人信息。

5.2 Outside the Jardine Matheson Group

怡和洋行集团外部

Your personal information may also be transferred to third parties outside the Jardine Matheson Group to complete the purposes listed in section 3 above including:

为上述第 3 节中所示之目的，您的个人信息亦可能会被传输至怡和洋行集团外部的第三方，包括：

- third-party service providers, such as our (IT) systems providers, our hosting providers such as Irasia, our payroll providers, consultants (including lawyers and tax accountants), recruiters, public relationship advisers and other goods and services providers (such as mobility service providers);

第三方服务提供商，例如我们的（IT）系统服务提供商、例如 Irasia 等的托管服务提供商、我们的薪资服务提供商、顾问（包括律师和税务会计师）、猎头、公共关系顾问和其他货物和服务提供商（例如流动性服务提供商）；

- a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of the Jardine Matheson Group's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;

就怡和洋行集团部分或全部业务或资产或任何相关权利或权益的实际或潜在转让或合并，或为收购业务或与之进行合并之目的，向潜在的买方、受让方、合并方或卖方及上述各方的顾问传输您的个人信息；

- any local, national and/or international regulatory or enforcement body or court or other form of tribunal where we are required to do so by applicable law or regulation or at their request;

任何地方、国家和/或国际监管或执法机构、法院或其他形式的仲裁庭，如果适用法律法规或前述机构要求我们如是为之；

- our customers (e.g. we communicate professional contact details of one of our employees to a customer), for employee personal information only;

我们的客户（例如我们向客户提供员工的业务联系方式），但仅限于员工个人信息；

- trustees, for employee personal information only; and

信托人，但仅限于员工个人信息；以及

- any central or local government department and other statutory or public bodies.

任何中央或地方政府部门和其他法定或公共机构。

5.3 Transfers outside China

传输至中国境外

The personal information transferred within or outside the Jardine Matheson Group as set out in sections 5.1 and 5.2 may also be processed in a country/region outside of China. Those

countries/regions typically include Hong Kong, Singapore and the Philippines. Your personal information may also be disclosed to other jurisdictions where we have business operations, such as the countries and regions in European Economic Area and other South East Asia areas including Vietnam, Thailand, Malaysia and Indonesia.

根据第 5.1 和 5.2 节所述，传输至怡和洋行集团内部或外部的个人信息可能会在中国境外进行处理。这些国家/地区通常包括香港、新加坡和菲律宾。您的个人信息亦可能传输至我们开展业务的其他司法管辖区，例如欧洲经济区的国家和地区及越南、泰国、马来西亚和印度尼西亚等其他东南亚地区。

If your personal information is transferred outside of China, we will ensure that such transfer is carried out in compliance with applicable data protection rules.

如果您的个人信息被传输至中国境外，我们将确保该传输遵守适用的数据保护规则。

Further details of the transfers of your personal information outside of China and the adequate safeguards used by the Jardine Matheson Group in respect of such transfers (including copies of relevant agreements) are available from us by contacting privacy@jardines.com. You can also use this email address to request further information about the entities that comprise the Jardine Matheson Group, the countries/regions in which they operate and their corporate identity, and request for exercising your rights under section 8 with respect to the personal information disclosed to overseas recipients.

有关您的个人信息向中国境外传输的进一步详情及怡和洋行集团就这些传输采取的充分保障措施（包括相关协议的副本），您可通过发送电子邮件至 privacy@jardines.com 与我们联系以获取该等信息。您亦可通过此电子邮箱地址获取怡和洋行集团的关联机构、其所在国家/地区及其企业信息，并请求行使第 8 节项下对向境外接收方披露的个人信息您所享有的权利。

6. How long we keep your personal information

我们保存您的个人信息的期限

We will only retain personal information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. In general, although there may be limited exceptions:

我们仅在为实现处理个人信息的目的或者在为遵守法律、法规和内部规章制度所需的必要期限内保存个人信息。尽管可能存在有限的例外情况，个人信息的保存期限一般如下所列：

- (a) employee personal information (including those relating to their dependents, if any) is kept for seven (7) years after termination of employment, although we may continue to keep such personal information for a longer time if we have obtained your consent to do so;

员工个人信息（包括其受养人（如有）的个人信息）在劳动关系终止后会保存七（7）年。如果我们已经获得您的同意，我们可能会继续保存更长的期限；

- (b) personal information relating to benefit users is kept for seven (7) years from the date when their entitlements have ceased unless we are requested to delete such personal information earlier; and

与福利受领人有关的个人信息在其福利终止之日起会保存七（7）年，除非我们被要求提前删除此类个人信息；以及

- (c) personal information of job candidates is kept for no longer than five (5) years from the date when they have submitted the last job application.

与求职者有关的个人信息在其提交最后一份工作申请之日起会保存不超过五（5）年。

7. Protection of your personal information

对您的个人信息的保护

We use a range of physical, electronic and managerial measures to ensure that we keep your personal information secure, accurate and up to date. These measures include:

我们采取各种物理、电子和管理措施以保障您的个人信息的安全性、准确性及时新性。该等措施包括：

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal information;

向相关人员提供教育和培训，以确保他们在处理个人信息时知晓我们的隐私义务；

- administrative and technical controls to restrict access to personal information on a 'need to know' basis;

管理和技术控制，使个人信息仅在“确需知悉”时方能被访问；

- technological security measures, including fire walls, encryption and anti-virus software; and

技术安全措施，包括防火墙、加密和防病毒软件；以及

- physical security measures, such as staff security passes to access our premises.

物理安全措施，例如人员须凭安全通行证进入我们的场所。

8. Your rights and how to contact us

您的权利及如何与我们联系

You have various rights in relation to your personal information. In particular, you have a right to:

关于您的个人信息，您享有各类权利。具体而言，您享有以下权利：

- object to the processing of your personal information;

拒绝对您的个人信息进行处理；

- request a copy of the personal information we hold about you;

索取我们持有的关于您的个人信息的副本；

- ask that we update the personal information we hold about you, or correct such personal information that you think is incorrect or incomplete;

要求我们更新我们持有的关于您的个人信息，或更正您认为不准确或者不完整的个人信息；

- ask that we delete personal information that we hold about you, or restrict the way in which we use such personal information; and

要求我们删除我们持有的关于您的个人信息，或限制我们使用此类个人信息的方式；以及

- withdraw consent to our processing of your personal information (to the extent such processing is based on consent).

撤回对我们处理您的个人信息的同意（如果相关处理是基于您的同意而进行）。

We will honour any requests, withdrawals or objections as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. If we do not comply with your request, we will explain why.

我们将根据适用的数据保护规则的要求尊重任何请求、撤回或异议。但请注意这些权利不是绝对的。它们并非在任何时候均适用，可能会涉及例外情况。如果我们拒绝您的请求，我们将说明理由。

To exercise any of your rights, or if you have any other questions about our use of your personal information, please email us at privacy@jardines.com. You may also use these contact details if you wish to make a complaint to us relating to your privacy.

如果您希望行使您的任何权利，或者您对我们使用您的个人信息有任何其他问题，请发送电子邮件至 privacy@jardines.com。您亦可通过此联系方式向我们作出与您的隐私相关的投诉。

If you are unhappy with the way we handled your personal information or any privacy query or request you have raised with us, you also have a right to complain to a data protection regulator in the place where you live or work, or in the place where you think an issue in relation to your personal information has arisen.

如果您对我们处理您的个人信息或者处理您提出的任何隐私问询或请求的方式有意见，您还有权向您居住地或工作地或者您认为的与您的个人信息有关的问题发生地的数据保护监管机构投诉。

9. Changes to this notice

本通知的修订

This notice was last updated in May 2023.

本通知最后更新于 2023 年 5 月。

This notice may be subject to amendments. Any future changes or additions to the processing of personal information as described in this notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

本通知可能会不时被修订。任何对本通知中所述的对您有影响的个人信息处理规定的修订或补充，均会通过适当的渠道通知您，告知方式具体取决于我们通常与您通信的方式。