

PRIVACY NOTICE 隐私声明

Effective Date: from 21 July 2021
生效日期：自 2021 年 7 月 21 日起

This Privacy Notice explains the manner in which companies in the Vistra Group (meaning Vistra Group Holdings (BVI) III Limited, any of its current and future affiliated entities, or such other amalgamated or re-organised successor company(ies) of Vistra Group Holdings (BVI) III Limited, the “**Vistra Group**”) collect, use and disclose your personal data, and your rights in relation to the personal data which it holds.

本隐私声明解释瑞致达集团 (即 Vistra Group Holdings (BVI) III Limited、其现时及未来的任何联属实体或 Vistra Group Holdings (BVI) III Limited 的有关其他合并或重组后的公司，统称「**瑞致达集团**」) 旗下公司收集、使用和披露您的个人数据的方式，以及您对其所持有的个人数据的权利。

VISTRA CHINA (COMPANY) LIMITED (好优投资咨询(上海)有限公司), VISTRA INTERNATIONAL EXPANSION CONSULTANCY SERVICES (BEIJING) LIMITED (睿迪思咨询服务(北京)有限公司), and VISTRA MANAGEMENT CONSULTING (FOSHAN) LIMITED (瑞致达(佛山)企业管理咨询有限公司) (COLLECTIVELY, “VISTRA CHINA”)

好优投资咨询(上海)有限公司、睿迪思咨询服务(北京)有限公司及瑞致达(佛山)企业管理咨询有限公司(统称「**瑞致达中国**」)

Vistra China (in this Privacy Notice, “**Vistra**”, “**us**”, “**we**” and “**our**”) is the controller of your personal data and, as a part of the Vistra Group, recognises its responsibilities in relation to the collection, holding, processing, use, disclosure and/or transfer of personal data under, amongst others, the People’s Republic of China (“**PRC**”) Cybersecurity Law (中华人民共和国网络安全法), the PRC Data Security Law (中华人民共和国数据安全法), the Decision on Strengthening Online Information Protection (加强网络信息保护的決定), the National Standard of Information Security Technology – Guideline for Personal Information Protection within Information System for Public and Commercial Services (中国国家标准化管理委员会 – 公共及商用服务信息系统个人信息保护指南) and the Bills of PRC Personal Information Protection Law (中华人民共和国个人信息保护法草案) (to be promulgated and implemented) (collectively, “**China DPL**”), and any other applicable legislation, rules and guidelines on the protection of personal data.

瑞致达中国(于本隐私声明称为「**瑞致达**」、「**我们**」和「**我们的**」)是您个人数据的控制者，作为瑞致达集团的一份子，瑞致达中国承认其根据(其中包括)《中华人民共和国(「**中国**」)网络安全法》、《中华人民共和国数据安全法》、《加强网络信息保护的決定》、《中国国家标准化管理委员会 – 公共及商用服务信息系统个人信息保护指南》和将颁布及实施的《中华人民共和国个人信息保护法草案》(统称「**中国数据保护法**」)及有关个人数据保护的任何其他适用立法、规则及指引对收集、持有、处理、使用、披露及/或转移个人数据的责任。

Personal data will be collected by us only for lawful purposes and we shall take reasonable steps to ensure that personal data held by us is accurate, up-to-date and complete. We shall moreover implement all practicable and reasonable steps to protect any personal data we hold against misuse, interference, unauthorised or accidental access, modification, disclosure, processing, erasure, loss or use.

我们将仅出于合法目的收集个人数据，我们将采取合理措施确保我们持有的个人数据属准确、最新和完整。此外，我们将实施所有可行且合理的步骤，以保护我们持有的任何个人数据免遭滥用、干扰、未经授权或意外访问、修改、披露、处理、删除、丢失或使用。

If we engage another party to process any personal data held by us, we shall adopt contractual or other means to ensure that such party complies with all applicable data protection laws and this Privacy Notice. We shall only use personal data for the purposes for which your personal data was originally collected and as further detailed herein. Such party that obtains/receives personal data from us shall be subject to its own separate and primary privacy obligations under PRC law.

如果我们聘请另一方处理我们持有的任何个人数据，我们将采用合同或其他方式确保该方遵守所有适用的数据保护法律和本隐私声明。我们只会将个人数据用于最初收集您的个人数据并在此进一步详述的目的。从我们那里获取/接收个人数据的该方须遵守中国法律规定的其单独和主要的隐私义务。

We will use your personal data only in accordance with this Privacy Notice. Vistra may update this Privacy Notice from time to time. We advise you to periodically review this Privacy Notice to be informed of how Vistra is protecting your privacy. We will notify all eligible data breaches to the Cyberspace Administration of China (中华人民共和国国家互联网信息办公室) (“CAC”), as may be necessary and required, and all affected individuals.

我们将仅根据本隐私声明使用您的个人数据。瑞致达可能会不时更新本隐私声明。我们建议您定期查看本隐私声明，以了解瑞致达如何保护您的隐私。我们会将所有符合条件的数据泄露事件告知中华人民共和国国家互联网信息办公室（「网信办」）(如必要及按规定)和所有受影响的个人。

This Privacy Notice outlines Vistra’s practices and the choices you have concerning the collection and use of your personal data. This Privacy Notice should be read together with the applicable terms and conditions, terms of engagement, or service agreements of the relevant service or website provided by Vistra (the “**Terms and Conditions**”), provided that, in the event of any inconsistency between this Privacy Notice and the Terms and Conditions concerning matters relating to personal data, the Terms and Conditions shall prevail.

本隐私声明概述了瑞致达的做法以及您对收集和使用的个人数据方面的选择。本隐私声明应与瑞致达提供的相关服务或网站的适用条款和条件、工作条款或服务协议（「**条款和条件**」）一起阅读，如果本隐私声明与有关个人数据事宜的条款和条件存在不一致，概以条款和条件为准。

This Privacy Notice supersedes any previous Privacy Notice or equivalent which you may have been provided with or seen prior to the Effective Date stated above.

本隐私声明取代您在上述生效日期之前可能已经获得或看到的任何先前的隐私声明或同等文件。

Queries, Complaints and Contact Details

问询、投诉及联络方式

Requests for disclosure, access, correction, complaints, deletion or other queries relating to how your personal data is processed should be addressed to us via the contact details set forth below:

如对处理您个人数据的方式的披露、访问、更正、投诉、删除或其他问询有请求，应通过以下联络方式发送给我们：

Address:

地址：

Room 1005, No. 1728-1746, West Nanjing Road, Jing’an District, Shanghai, People’s Republic of China

中华人民共和国上海市静安区南京西路 1728-1746 号 1005 室

Telephone: +86 21 6090 0598

电话： +86 21 6090 0598

Email: Privacy@vistra.com

电邮： Privacy@vistra.com

To ensure the integrity and safety of personal data, Vistra will only disclose such data to you if our internal procedures are satisfied. Depending on the nature of your request, we may ask you to complete a personal data request form. To the extent permitted by applicable laws and regulations, we reserve the right to refuse unreasonable requests (for example, requests which infringe the privacy of others). To the extent permitted by applicable laws and regulations, we reserve the right to charge a reasonable fee for the cost of processing any request. All requests will be handled in a reasonable period of time.

为确保个人数据的完整性和安全性，瑞致达只会在符合我们的内部程序的情况下向您披露此类数据。根据您的请求的性质，我们可能会要求您填写个人数据请求表。在适用法律法规允许的范围内，我们保留拒绝不合理请求（例如侵犯他人隐私的请求）的权利。在适用法律法规允许的范围内，我们保留就处理任何请求的成本收取合理费用的权利。所有请求都将在合理的时间内得到处理。

Data Request and Access Rights to Personal data

数据请求和访问个人数据的权利

Where applicable, under the China DPL or any other applicable data protection laws, you may have the right:

在适用的情况下，根据中国数据保护法或任何其他适用的数据保护法律，您可能有权：

- to be informed of the data processing rules applicable to you and to request to access such data;
知悉适用于您的数据处理规则及请求访问该数据；
- to request to access copies of your personal data;
请求访问您个人数据的副本；
- to require us not to send you marketing communications;
要求我们不向您发送营销讯息；
- to require us to erase, block or delete your personal data;
要求我们删除、阻断或清理您的个人数据；
- to require us to rectify the personal data we hold about you if it is inaccurate; and
如果我们持有的您的个人数据不准确，可以要求我们更正；及
- to request us to have your personal data transferred to a third party where technically feasible to do so.
请求我们在技术上可行的情况下将您的个人数据转交给第三方。

Please note that the above rights (if applicable) are not always absolute, and we may be entitled to refuse requests where exceptions apply in accordance with applicable laws and regulations.

请注意，上述权利(如适用)并非一直是绝对的，在例外情况下，我们有权根据适用法律法规拒绝请求。

Requests for access, correction, complaints, or other queries relating to how your personal data is processed should be addressed to us via the contact details set out under the heading “Queries and Contact Details” above. You may also contact the CAC directly (for more details, please revert to the following website: <https://www.cac.gov.cn>).

如对您个人数据的访问、更正、投诉或其他问询有请求，应通过上文「问询及联络方式」部分所载联络方式发送给我们。您也可以直接与网信办联系(详情请访问以下网站：<https://www.cac.gov.cn>)。

If you are located in the European Union (“EU”) and the EU General Data Protection Regulation applies:

如果您位于欧洲联盟(「**欧盟**」)并且适用欧盟《通用数据保护条例》：

- please refer to the EU regulator in the jurisdiction where you are located (in the EU) to find out more about your rights; and
请咨询您所在的司法权区(欧盟境内)的欧盟监管机构了解有关您权利的更多信息；及
- you can also make a complaint to a local EU regulator in the jurisdiction where you are located if you are not satisfied with how we are processing your personal data.
如果您对我们处理您个人数据的方式不满，您还可以向您所在司法权区的欧盟当地监管机构投诉。

How we process, handle and collect your data

我们如何处理、处置及收集您的数据

We may process, handle and collect your personal data in a number of ways, for example:

我们可能以多种方式处理、处置及收集您的个人数据，例如：

- from the information you provide to us when you meet us;
来自见面时您提供给我们信息；
- from information about you provided to us by your company or an intermediary;
来自您的公司或中介机构向我们提供的关于您的信息；
- when you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
您与我们的电话、传真、电子邮件或其他形式的电子通信。就此而言，我们可能会监测、记录和储存任何此类通信；
- when you complete (or we complete on your behalf) client on-boarding or application or other forms;
您所完成(或我们代表您完成)的客户入职或申请或其他表格；
- from other companies in the Vistra Group;
来自瑞致达集团的其他公司；
- from your agents, advisers, intermediaries, and custodians of your assets; and
来自您的代理人、顾问、中介机构和您的资产保管人；及
- from publicly available sources or from third parties, most commonly where we need to conduct background checks about you.
来自公开来源或第三方，最常见的是我们需要对您进行背景调查。

The categories of personal data we may collect

我们可能收集的个人数据的类别

We may collect the following categories of personal data about you:

我们可能会收集关于您的以下几类个人数据：

- your name and contact information, such as your home or business address, email address and telephone number;
您的姓名和联系资料，如您的家庭或公司地址、电子邮件地址和电话号码；

- biographical information which may confirm your identity including your date of birth, tax identification number and your passport number or national identity card details, country of domicile and/or your nationality;
可确认您身份的个人资料，包括您的出生日期、税务识别号码和您的护照号码或国民身份证详情、居住国及／或您的国籍。
- information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth, as well as your bank account details;
与您的财务状况有关的资料，如收入、支出、资产和负债、财富来源，以及您的银行账户明细；
- information about your knowledge and experience in the investment field;
您在投资领域的知识和经验情况；
- an understanding of your goals and objectives in procuring our services;
了解您采购我们服务的目标和目的；
- information about your employment, education, family or personal circumstances, and interests, where relevant, as may be necessary and required from time to time;
您的就业、教育、家庭或个人情况以及兴趣的相关信息 (如必要及按不时的规定)；
- information to assess whether you may represent a politically exposed person or money laundering risk; and
可评估您是否可能代表政治公众人物或是否有洗钱风险的资料；及
- any other personal data you may decide to share with us or any member of the Vistra Group.
您可能决定与我们或瑞致达集团的任何成员公司共享的任何其他个人数据。

The purpose for processing your personal data (other than with your consent), how we use that personal data and the parties with whom we may share it

处理您的个人数据的目的 (除经您同意外)，我们如何使用该个人数据，以及我们与谁分享该数据

Performance of a contract

履行合同

We may process your personal data because it is necessary for the performance of our obligations under Terms and Conditions or any other contract, or in order to take steps at your request prior to entering into Terms and Conditions or any other contract.

我们可能会处理您的个人数据，因为这是履行我们在条款及条件或任何其他合同下的义务所必需的，或者是为了在签订条款及条件或任何其他合同前应您的要求采取措施。

In this respect, we may use your personal data for the following purposes:

就此而言，我们可能将您的个人数据用于以下方面：

- to prepare a proposal regarding the services we offer;
准备一份关于我们提供的服务的方案；
- to provide the services as set out in our Terms and Conditions or as otherwise agreed with you or our relevant contracting party from time to time;
提供我们与您或我们的相关订约方签订的条款及条件中规定的服务，或不时商定的其他服务；
- to deal with any complaints or feedback you may have; or
处理您可能有的任何投诉或反馈；或
- for any other purpose for which you provide us with your personal data.
用于任何其他您向我们提供个人数据的目的。

In this respect, we may share your personal data with, or transfer it to, the following parties:
就此而言，我们可能会与以下各方分享您的个人数据或将其转移到以下各方：

- your agents, advisers, intermediaries, and custodians of your assets who you tell us about;
您的代理人、顾问、中介机构以及您告知的资产保管人；
- third parties whom we engage to assist in delivering the services to you, including other companies in the Vistra Group;
我们聘请来协助向您提供服务的第三方，包括瑞致达集团的其他公司；
- our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, tax advisers, IT or public relations advisers;
我们的专业顾问，以获取建议或协助 (如有必要)，包括律师、会计师、税务顾问、信息技术或公共关系顾问；
- other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you; and
其他第三方，如我们向您推介的中介机构。我们会尽可能在推介前向您告知他们的信息；
及
- our data storage providers and any other software providers that we require to perform our services.
我们的数据存储提供商及我们提供服务所需的任何其他软件提供商。

Legitimate interests 合法权益

We may also process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person, provided such is in compliance with the China DPL, as applicable. For instance, our legitimate interests may be as regards to suspected unlawful activity or misconduct of a serious nature, for the establishment, exercise, or defence of a legal claim or for the purposes of a confidential alternative dispute resolution process.

我们也可能出于我们的合法权益，或有时只要符合中国数据保护法的规定 (如适用) 而出于他人的合法权益处理您的个人数据。例如，我们的合法利益可能是关于涉嫌严重性质的非法活动或不当行为，为了确立、行使或辩护法律索赔，或者为了保密的替代争议解决程序的目的。

In this respect, we use your personal data for the following purposes:
就此而言，我们将您的个人数据用于以下方面：

- for marketing to you, provided in compliance with the China DPL, as applicable. In this respect, see the separate section on “Marketing” set out below;
用于根据中国数据保护法 (如适用) 向您营销。就此而言，详情见下文「营销」一节；
- training our staff or monitoring their performance;
培训我们的员工或监督他们的表现；
- for the administration and management of our business, including recovering money owed to us, and archiving or statistical analysis;
用于我们业务的行政及管理，包括追回我们的欠款，以及存档或统计分析；
- seeking advice on our rights and obligations, such as where we require our own legal advice; and
用于寻求与我们的权利和义务有关的建议，例如应就哪些方面获取法律意见；及
- defending a claim against us or prosecuting or making a claim against you or a third party.
用于针对我们的索赔进行辩护，或对您或第三方提起诉讼或提出索赔。

With respect to the purposes listed above, we may share your personal data with, or transfer it to, the following parties:

就上述目的而言，我们可能会与以下各方分享您的个人数据或将其转移到以下各方：

- **your agents, advisers, intermediaries, and custodians of your assets who you tell us about;**
您的代理人、顾问、中介机构以及您告知的资产保管人；
- **third parties whom we engage to assist in delivering the services to you, including other companies in the Vistra Group;**
我们聘请来协助向您提供服务的第三方，包括瑞致达集团的其他公司；
- **our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, tax advisers, IT or public relations advisers;**
我们的专业顾问，以获取建议或协助 (如有必要)，包括律师、会计师、税务顾问、信息技术或公共关系顾问；
- **our bankers, insurers and insurance brokers;**
我们的银行家、保险公司及保险经纪人；
- **other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;**
其他第三方，如我们向您推介的中介机构。我们会尽可能在推介前向您告知他们的信息；
- **our data storage providers and any other software providers that we require to perform our services; and**
我们的数据存储提供商及我们提供服务所需的任何其他软件提供商；及
- **third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.**
第三方及其顾问，该等第三方正在收购或考虑收购我们的全部或部分业务。

Legal obligations

法律义务

We may also process your personal data for our compliance with a legal or regulatory obligation.

我们也可能为了遵守我们所承担的法律或监管义务而处理您的个人数据。

In this respect, we will use your personal data for the following:

就此而言，我们将您的个人数据用于以下方面：

- **to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws; or**
用于履行我们的合规和监管义务，例如遵守反洗钱法；或
- **as required by tax authorities or any competent court or legal authority.**
根据税务机关或任何主管法院或法律机构的要求。

With respect to the obligations above, we may share your personal data with the following parties:

关于上述义务，我们可能会与以下各方共享您的个人数据：

- **our advisers where it is necessary for us to obtain their advice or assistance;**
我们的顾问，以获取建议或协助 (如有必要)；
- **our auditors where it is necessary as part of their auditing functions;**
我们的审计师，作为他们审计职能的一部分 (如有必要)；
- **third parties who assist us in conducting background checks;**
协助我们进行背景调查的第三方；

- other companies in the Vistra Group;
瑞致达集团的其他公司；
- relevant regulators or law enforcement agencies where we are required to do so.
需要我们共享数据的相关监管机构或执法机构。

Marketing

营销

From time to time, we, or other members of the Vistra Group, may send you marketing communications about additional services we provide which may be relevant to you, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you.

我们或瑞致达集团的其他成员公司可能不时会向您发送有关我们提供的可能与您有关的额外服务的营销讯息，以及以提醒、通讯和邀请参加我们认为您可能感兴趣的事件或活动的形式提供的其他信息。

We, or other members of the Vistra Group, may communicate this to you in a number of ways including by post, telephone, email, SMS or other digital channels.

我们或瑞致达集团的其他成员公司可能以多种方式与您沟通，包括通过邮寄、电话、电子邮件、短信或其他数字渠道。

If you receive marketing communications from us but do not wish to receive them in the future, you may opt out of receiving them at any time, free of charge, by the following applicable means:

如您收到我们的营销讯息，但不希望以后再收到，您可以随时通过以下适用的方式免费选择不再接收这些讯息：

- unsubscribing by following the “Reply To” instructions contained in the marketing text message;
按照营销短信中载明的「回复至」指示取消订阅；
- following the unsubscribe instructions or hyperlink in the email;
按照电子邮件中的取消订阅指示或超链接；
- following the unsubscribe instructions in the applicable mobile application;
按照适用移动应用程序中的取消订阅指示；
- notifying us that you no longer wish to receive marketing communications when receiving our marketing calls; or
在接到我们的营销电话时通知我们，您希望不再接收营销讯息；或
- contacting us via the contact details set out under the heading “Queries and Contact Details” stated above to tell us that you no longer wish to receive marketing communications through any channel.
通过上文标题「问询及联络方式」中列出的联系方式与我们联系，告知我们您希望不再通过任何渠道接收营销讯息。

We may issue service-related announcements to you when necessary (e.g. new laws, regulations or compliance requirements). You may not be able to opt out of these announcements which are service-related and not promotional in nature.

我们可能会在必要时（如颁布新法律、法规或合规要求）向您发送与服务相关的公告。您可能无法选择不再接收这些与服务相关且非促销性质的公告。

Withdrawal of Consent

撤回同意

If you have given your consent and you wish to withdraw it at any time, please unsubscribe and opt out as outlined above or contact us via the contact details set out under the heading “Queries and Contact Details” above.

如果您已同意并希望随时撤回，请取消订阅并选择如上所述退出，或通过上文「问询及联络方式」标题下列出的联系方式与我们联系。

Transfer and processing of your personal data cross-border

跨境转移和处理您的个人数据

We may transfer, store, or process your personal data in locations outside the jurisdiction in which you are based (“**Jurisdiction**”). Where the countries to which your personal data is transferred do not offer an equivalent level of protection for personal data to the laws of the Jurisdiction, we will ensure that appropriate and reasonable safeguards and security measures are put in place. We will use appropriate and reasonable data security safeguards, use contractual confidentiality terms and agreements with third parties, ensure that the applicable country has equivalent data protection laws, or seek your explicit consent to the transfer of your personal data to a place outside the Jurisdiction (each time as applicable).

我们可能会在您所在的司法管辖区（「**司法管辖区**」）以外的地方转移、储存或处理您的个人数据。如果您的个人数据被转移到的国家不能提供与司法管辖区法律同等水平的个人数据保护，我们将确保采取适当和合理的保护措施和安全措施。我们将使用适当和合理的数据安全保障措施，使用合同保密条款和与第三方达成的协议，确保适用的国家/地区拥有同等的数据保护法，或寻求您明确同意将您的个人数据转移到司法管辖区以外的地方（每次均适用）。

Transfer and processing of your personal data outside the PRC

在中国境外转移和处理您的个人数据

Where we transfer your personal data from the PRC, it will only be transferred on one of the following bases:

如我们将您的个人数据从中国转移，其将仅基于以下任一情况进行转移：

- the country that we send the personal data to in our view provides an adequate level of protection for personal data;
我们认为，我们将个人数据转移至的国家/地区为个人数据提供了充分的保护；
- the recipient has entered into an appropriate contract with us; and/or
接收方已与我们签订适当合同；及/或
- you have consented to the transfer.
您已同意转移。

Questions

查询

To find out more about transfers by us of your personal data and the countries concerned you can contact us via the contact details set out under the heading “Queries and Contact Details” above.

如欲了解我们转移您的个人数据及所涉国家/地区的详情，请通过上文「问询及联络方式」标题下的任何联系方式与我们联系。

Cookies

数码存根

Our website uses cookies to improve your experience on our website. For full details on how cookies are used, please see our [Cookie Policy](#).

我们的网站使用小型文字档案 (cookies) 来改善您在我们网站上的体验。关于如何使用小型文字档案的详情，请参见我们的数码存根政策。

Retention of your data

保留您的数据

Should your account or relationship with us be cancelled or terminated or have otherwise expired at any time, we shall cease processing your personal data as soon as reasonably practicable following such cancellation or termination, provided that we may keep copies of your data as is reasonably required for archival purposes, for use in relation to any actual or potential dispute, for the purpose of compliance with applicable laws and regulations or for the purpose of enforcing any agreement we have with you, for protecting our rights, property or safety, or the rights, property or safety of our employees, and for performing or discharging any functions, obligations and responsibilities we may have. We may also continue processing your personal data for our legitimate interests, as further detailed in this Privacy Notice.

如您与我们的账户或关系在任何时候被取消或终止或以其他方式到期，我们将在合理可行的情况下尽快停止处理您的个人数据，前提是我们可以根据存档目的合理保留您的数据副本，用于任何实际或潜在的纠纷，以遵守适用的法律和法规，或用于执行我们与您达成的任何协议，以保护我们的权利、财产或安全，或我们员工的权利、财产或安全，以及用于履行或执行我们可能承担的任何职能、义务。我们也可能为了我们的合法利益继续处理您的个人数据，如本隐私声明中所详述。

Storage and third parties

存储和第三方

Vistra may store your personal data for processing in our local servers and Vistra Group databases, or use third party cloud vendors and data processors where we have contractual security measures and reassurances of appropriate security measures in place for as long as it is necessary or required in order to fulfill legal, contractual or statutory obligations or for the establishment, exercise or defense of legal claims, and in general where we have a legitimate interest for doing so (please also note the provisions under “Transfer and processing of your personal data cross-border” above in this regard). In particular:

如果我们有合同安全措施并保证适当的安全措施到位，瑞致达可能会将您的个人数据存储在我们的本地服务器和瑞致达集团数据库中进行处理，或使用第三方云供应商和数据处理器，只要是履行法律、合同或法定义务或建立、行使或抗辩法律索赔所必需或必要，而且我们如此处理通常有合法权益 (请注意上文「跨境转移和处理您的个人数据」一节中的条款)。具体而言：

- where we have collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will retain that personal data for at least seven (7) years after the termination of our relationship, unless we are required to retain this information by another law, regulation or for the purposes of court proceedings; or
如果我们按照反洗钱立法的要求收集您的个人数据，包括用于识别、筛选和报告，我们会在我们的关系终止后保留有关个人数据至少七 (7) 年，除非其他法律法规要求我们保留有关资料，或为了法庭诉讼的需要；或
- otherwise, we will, in most cases, retain your personal data for a period of seven (7) years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.

否则，在大多数情况下，我们将在我们与您的合同或其他关系终止后保留您的个人数据七 (7) 年，以备因我们向您提供的服务而产生的任何索赔。

In the event of any discrepancy or conflict between the English version and the Chinese version, the English version shall prevail.

如果英文版本与中文版本之间有任何歧义或冲突，应以英文版本为准。

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