

PRIVACY NOTICE  
隐私声明

**Effective Date:** from 1 November 2021

生效日期：自2021年11月1日起

**VISTRA CHINA (COMPANY) LIMITED, VISTRA INTERNATIONAL EXPANSION CONSULTANCY SERVICES (BEIJING) LIMITED, and VISTRA MANAGEMENT CONSULTING (FOSHAN) LIMITED** (collectively, “**VISTRA CHINA**”, “**we**”, “**our**”, “**us**”) are companies incorporated in the People’s Republic of China (“**PRC**”) and are part of 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). This Privacy Notice explains the manner in which we may collect, use and disclose personal information of **all of our clients, clients’ ultimate beneficial owners, and any other individual in relation to our clients, including but not limited to shareholders and directors** (collectively, “**you**” and “**your**”) for providing services to you, any companies you own or control, and/or any other people or organisations, and for any other purposes as detailed herein, and describes your rights in relation to the personal information which we hold regarding you. You acknowledge that before providing any of your personal information to us, you have read and understood, and agree with, this Privacy Notice. In case you are an intermediary and you provide any personal information to us on behalf of and/or in respect of an individual (“**Data Subjects**”), you represent and warrant that you have informed those Data Subjects of this Privacy Notice, and that you have obtained those Data Subjects’ consent for providing such personal information to us, and for all data processing described herein.

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、瑞致达（佛山）企业管理咨询有限公司（统称「瑞致达中国」、「我们」和「我们的」）均为在中华人民共和国（「中国」）注册成立的公司，并属瑞致达集团（即Vistra Group Holdings (BVI) III Limited、其现在及未来的任何关联实体或Vistra Group Holdings (BVI) III Limited的有关其他合并或重组后的承继公司）的一份子。本隐私声明阐明了为向您、您所有或控制的公司和/或任何其他个人或组织提供服务之目的，及本隐私声明所载之任何其他目的，我们就所有我们的客户、客户的最终受益人及任何与我们客户有关的其他个人，包括但不限于股东和董事（统称「您」或「您的」）的个人信息可能进行的收集、使用和披露的方式，以及描述您对我们所持有的有关您个人信息的权利。您确认在向我们提供任何您的个人信息之前，您已阅读、理解并同意本隐私声明的内容。如您是中介机构，并代表和/或涉及任何个人（「数据主体」）向我们提供任何个人信息，您声明并保证您已告知该等数据主体本隐私声明的内容，并将该等个人信息提供给我们，及按照本隐私声明所载进行的所有数据处理活动已获得该等数据主体的同意。

Vistra China is the data controller of your personal information and, as a part of the Vistra Group, recognises its responsibilities in relation to the collection, storage, processing, use, disclosure and/or transfer of personal information under, including but not limited to, the *People’s Republic of China (“PRC”) Cybersecurity Law, the PRC Data Security Law, and the PRC Personal Information Protection Law*, and any other applicable legislation, rules and guidelines on the protection of personal information (collectively, “**China DPL**”).

瑞致达中国是您个人信息的控制者，作为瑞致达集团的成员，瑞致达中国认可其根据，包括但不限于，《中华人民共和国网络安全法》、《中华人民共和国数据安全法》、和《中华人民共和国个人信息保护法》及有关个人信息保护的任何其他适用的立法、规则及指引(以上统称「中国数据保护法」)所负有的对收集、存储、处理、使用、披露及/或传输个人信息的责任。

Your personal information may be collected by us only for lawful purposes and only to the extent reasonably required for those purposes. All practicable steps will be taken by us to

ensure that personal information held by us is accurate, up-to-date and complete. Moreover, in order to protect any personal information we hold against unauthorized or accidental access, processing, erasure, loss or use, we have used and will continue to use all practicable security steps, for example, developing and implementing internal management rules and operating procedures, conducting appropriate personal information classification management, taking corresponding security technical measures such as encryption and de-identification, determining in a reasonable manner the operational access required for personal information processing, providing security trainings for employees on a regular basis, and conducting periodic internal compliance audits in respect of personal information processing. If we entrust a data processor as our authorized agent to process any personal information held by us on our behalf, we shall adopt contractual or other means to ensure that the agent complies with these same data security requirements. We shall only use personal information for the purposes for which your personal information was originally collected and as further detailed herein.

我们将仅出于合法目的并仅限于合理必要范围内收集个人信息。我们将采取所有可行措施确保我们持有的个人信息属准确、最新和完整。此外，为保护我们持有的任何个人信息免遭未经授权或意外访问、处理、删除、丢失或使用，我们已使用并将继续使用所有可行的安全措施，例如，制定并实施内部管理制度及操作规程、进行适当的个人信息分类管理、采取相应的安全技术措施（如加密及去标识化）、合理确定处理个人信息所需的操作权限、定期对员工进行安全培训及定期就个人信息处理进行内部合规审计。倘我们委托数据处理者作为我们的授权代理，以代表我们处理我们所持有的任何个人信息，我们将采用合同或其他方式确保代理遵守上述相同的数据安全要求。我们只会将个人信息用于最初收集您个人信息以及在此进一步详述的目的。

Vistra China may update this Privacy Notice from time to time. We advise you to periodically review this Privacy Notice to be informed of how Vistra China is protecting your privacy. We will notify all eligible data breaches to the Cyberspace Administration of China (“**CAC**”), and all affected individuals as may be necessary and required.

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」）和所有受影响的个人（如必要及按要求）。

This Privacy Notice outlines Vistra China’s practices and the choices you have concerning the collection and use of your personal information. 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 China (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 information, the Terms and Conditions shall prevail. This Privacy Notice is written in both English and Chinese. In the event of any discrepancies between the English and Chinese versions, the Chinese version shall prevail.

本隐私声明概述了瑞致达中国的做法以及您对收集和使用权您个人信息方面的选择。本隐私声明应与瑞致达中国提供的相关服务或网站的适用条款和条件、委聘条款或服务协议（「**条款和条件**」）一起阅读，如果本隐私声明与条款和条件在有关个人信息事宜的规定存在不一致，概以条款和条件为准。本隐私声明以中英文书写。英文版本与中文版本不一致的，概以中文版为准。

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

本隐私声明自上述生效日期起生效，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**

#### 咨询、投诉及联络方式

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

如您申请披露、访问、更正、投诉、删除，或其他有关于如何处理您个人信息的申请，可通过以下联络方式告知我们：

#### Address:

##### 地址：

10/F, Tower 3, Lujiazui Finance Plaza, 826 Century Ave, Pudong New Area, Shanghai  
200120, P. R. China

中华人民共和国上海市浦东新区世纪大道826号陆家嘴金融广场3座10层

Telephone: +86 21 6090 0598

电话： +86 21 6090 0598

Email: [Privacy@vistra.com](mailto:Privacy@vistra.com)

电邮： [Privacy@vistra.com](mailto:Privacy@vistra.com)

To ensure the integrity and safety of personal information, Vistra China shall only disclose such data to you in accordance with our internal procedures. Depending on the nature of your request, we may ask you to complete a personal information 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.

为确保个人信息的完整性和安全性，瑞致达中国应根据我们的内部程序仅向您披露此类数据。根据您的申请性质，我们可能会要求您填写个人信息申请表。在适用法律法规允许的范围内，我们保留拒绝不合理申请（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申请的成本收取合理费用的权利。所有申请都将在合理的时间内得到处理。

### **Data Request and Access Rights to Personal Information**

#### 数据申请和访问个人信息的权利

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

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，您有权：

- to be informed of the data processing rules applicable to you;
- 知悉适用于您的数据处理规则；
- to know and to decide on the processing of your personal information, and to restrict or refuse the processing of your personal information, to the extent not prohibited by any other applicable laws and regulations;

- 在任何其他适用法律法规并未禁止的范围内，对您个人信息的处理享有知情权、决定权，有权限制或者拒绝处理您的个人信息行为；
- to request access to your personal information, where permitted by the applicable laws and regulations;
- 在适用法律允许的情况下，申请访问您的个人信息；
- 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 information, to the extent not prohibited by any other applicable laws and regulations;
- 在任何其他适用法律法规并未禁止的范围内，有权要求我们删除、阻断或清理您的个人信息；
- to require us to rectify or supplement any personal information relating to you which is inaccurate or incomplete; and
- 如果您的个人信息不准确或不完整，有权要求我们更正或补充；及
- to request us to have your personal information transferred to a third party where technically feasible to do so and the conditions specified by the national cyberspace administration are met.
- 在技术可行并符合国家互联网信息部门所明确条件的情况下，申请我们将您的个人信息转交给第三方。

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申请。

Requests for access, correction, complaints, or other queries relating to how your personal information is processed should be addressed to us via the contact details set out under the heading “*Queries, Complaints 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>).

如您申请访问、更正、投诉，或其他有关于如何处理您个人信息的申请，应通过上文「咨询、投诉及联络方式」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 information.
- 如果您对我们处理您个人信息的方式不满，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 information 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信息，例如：

- from the information you provide to us when you meet us, or from the personal information disclosed by yourself;
- 来自见面时您提供给我们信息，或来自您自行公开的个人信息；
- 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;
- 当您与我们进行电话、传真、电子邮件或其他形式的电子通信时。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 client due diligence or application or other forms in accordance with our requests;
- 您根据我们的要求配合完成的客户尽职调查、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 who are legitimate to disclose, most commonly where we need to conduct background checks about you.
- 来自公开来源或有权合法公开的第三方，最常见的是我们需要对您进行背景调查。

### **The categories of personal information we may collect**

我们可能收集的个人信息类别

We may collect the following categories of personal information, including **sensitive personal information**, about you, where relevant and necessary:

在相关和必要的情况下，我们会收集关于您的以下几类个人信息，包括**敏感个人信息**：

- your name and contact information, such as your home address (**sensitive personal information**) or business address, email address and telephone number;
- 您的姓名和联系资料，如您的家庭（敏感个人信息）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 (**sensitive personal information**) and your passport number (**sensitive personal information**) or national identity card details (**sensitive personal information**), 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、纳税人识别号（敏感个人信息）和您的护照号码（敏感个人信息）或公民身份证信息（敏感个人信息）、居住国及 / 或您的国籍。
- information relating to your financial situation (**sensitive personal information**) 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（敏感个人信息），如收入、支出、资产和负债、财富来源，以及您的银行账户信息；
- 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;
- 您采购我们服务的目标和目的；

- information about your employment, education, family or personal circumstances, 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，如相关时，(在必要及根据不时提出要求的状况下);
- information to assess whether you may represent a politically exposed person or money laundering risk; and
- 评估您是否可能是政治公众人物或是否有洗钱风险的信息；及
- any other personal information 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信息。

You acknowledge and agree that during our services providing process, your relevant personal information, including **sensitive personal information**, are necessary for us to provide such services. If you fail to provide your personal information, including any relevant **sensitive personal information**, which is necessary for us in our services provision, such as personal information to complete our Know Your Client/ Client Due Diligence process, we may not be able to provide our services. We shall limit the scope of collecting and processing any of your personal information, especially your **sensitive personal information**, only to the extent necessary for those purposes. Special categories of **sensitive personal information** require higher levels of protection and we have in place appropriate safeguards which we are required by law to maintain when processing such data.

您知悉及同意，在我们向您提供服务的过程中，取得您的相关个人信息（包括敏感个人信息）是为向您提供该等服务所必需的。如您不向我们提供您的个人信息，包括为我们提供服务所必需的任何相关敏感个人信息，例如为完成了解你的客户/客户尽职调查流程所需的个人信息，可能导致我们无法提供服务。我们应将收集及处理您任何个人信息，尤其是您的敏感个人信息的范围限制在上述目的所需的必要范围内。特殊类型的敏感个人信息要求更高水平的保护，我们已依法安排在处理有关数据时所必需的适当保护措施。

**The purpose for processing your personal information, how we use that personal information and the parties with whom we may entrusted to and/or shared with**  
处理您的个人信息的目的，我们如何使用该个人信息，以及我们委托给和/或分享给谁

Conclusion and/ or Performance of a contract  
为与您订立和/或履行合同

We may process your personal information 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信息，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 information for the following purposes:

就此而言，我们可能将您的个人信息用于以下方面：

- to prepare a proposal regarding the services we offer;
- 准备我们服务的提案；
- 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;
- 提供我们在条款及条件中约定的服务，或根据我们与您或我们相关缔约方不时另行约定的服务；
- to deal with any complaints or feedback you may have; or

- 处理您的投诉或反馈；或
- for any other purpose for which you consent and provide us with your personal information.
- 用于任何其他您同意且向我们提供个人信息的目的。

In this respect, we may entrust your personal information to, or share it with, the following parties, where relevant and necessary:

就此而言，我们可能会将您的个人信息委托给或分享给以下各方，如相关并有必要：

- 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我们的资产保管人；
- third parties whom we engage to assist in delivering the services to you, including other companies in the Vistra Group (for a list of locations, please refer to here);
- 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（有关地址列表，请参阅此处）；
- 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，如我们必须从其处获取建议或协助，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，如我们向您介绍的中介机构。我们会尽可能在介绍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 information 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.

在符合中国数据保护法的规定前提下 (如适用)，我们也可能在出于为我们的合法权益，或有时是出于为他人的合法权益所必要时，处理您的个人信息。例如，我们的合法权益可能与涉嫌非法活动或严重不当行为的案件有关，为了证明、行使法律索赔或抗辩，或者为了施行具有保密性质的争议解决替代程序。

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

就此而言，我们可能将您的个人信息用于以下方面：

- 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;
- 在中国数据保护法 (如适用) 框架下的营销活动。就此而言，详情见下文“营销”一节；
- 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，例如当我们需要为自身获取法律意见；及
- defending a claim against us or prosecuting or making a claim against you or a third party.
- 用于对针对我们的索赔进行抗辩，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 entrust your personal information to, or share it with, the following parties, where relevant and necessary:

就上述目的而言，我们可能会将您的个人信息委托给或分享给以下各方，如相关并必要：

- 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我们的资产保管人；
- 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，如我们必须从其处获取建议或协助，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、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，如我们向您介绍的中介机构。我们会尽可能在介绍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，当该等第三方正在收购或考虑收购我们的全部或部分业务时。

#### Legal and Compliance obligations

#### 法律及合规义务

We may also process your personal information for our compliance with a legal and Compliance obligation.

我们也可能为了遵守我们所承担的法律及合规义务而处理您的个人信息。

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

就此而言，我们可能将您的个人信息用于以下方面：

- 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 entrust your personal information to, or share it with the following parties, where relevant and necessary:

关于上述义务，我们可能会将您的个人信息委托给或分享给以下各方，如相关并必要：

- our advisers where it is necessary for us to obtain their advice or assistance;
- 我们的顾问，如我们必须从其处获取建议或协助；
- our auditors where it is necessary as part of their auditing functions;
- 我们的审计师，如有作为他们审计职能一部分的必要；
- 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.
- 要求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我们提供的可能与您相关的额外服务营销讯息，以及以提醒、简报和邀请您参加我们认为您可能感兴趣的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就此进行沟通，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, Complaints 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「咨询、投诉及联络方式」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的非促销性质公告。

### **Withdrawal of Consent**

#### 撤回同意

If you have given your consent for us to send your marketing communications 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, Complaints and Contact Details” above.

如果您已同意我们向您发送营销讯息并在任何时候希望撤回，请取消订阅并如上所述选择退出，或通过上文「咨询、投诉及联络方式」标题下列出的联系方式与我们联系。

### **Cross-border transfer of your personal information**

#### 跨境传输您的个人信息

When Vistra China entrusts an authorized agent to process your personal information and/or shares your personal information with any third party as set out in this Privacy Notice, where relevant and necessary, your personal information may be **transferred outside of the PRC (“Cross-border transfer”)**, for example when the personal information recipients are other companies of the Vistra Group which are not incorporated in the PRC. (For a list of locations, please refer to here); 当瑞致达中国委托一名授权代理处理您的个人信息及 / 或与本隐私声明所载任何第三方分享您的个人信息，如相关及必要，您的个人信息可能会**传输至中国境外（「跨境传输」**），例如，当个人信息接收者是瑞致达集团旗下不在中国注册成立的其他公司时，则属跨境传输。（有关地址列表，请参阅此处）。

Where the countries/regions to which your personal information is transferred do not offer an equivalent level of protection for personal information to the laws of the PRC, 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 the personal information recipients, and/or ensure that the applicable country/region has equivalent data protection laws. **By receiving our services, supplying personal information to us and/or accepting this Privacy Notice, you acknowledge and agree on the abovementioned cross-border transfer of your personal information, including your sensitive personal information.**

如您的个人信息的传输目的国/地区未对个人信息提供与中国法律同等水平的保护，则我们将确保有适当且合理的保护及安全措施。我们将使用适当且合理的数据安全保护措施，与个人信息接收者签订合同保密条款和协议，及/或确保所适用的国家/地区具有同等的数据保护法律)。

**接受我们的服务、向我们提供个人信息和/或接受本隐私声明，表示您确认并同意上述您个人信息的跨境传输，包括您的敏感个人信息。**

### Questions

#### 查询

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

如欲了解我们传输您的个人信息及所涉国家的详情，请通过上文「咨询、投诉及联络方式」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, transfer and deletion of your data**

### 保留、转让及删除您的数据

Should your account or relationship with us be cancelled or terminated or have otherwise expired at any time, we shall cease processing your personal information 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 information 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届满，我们应在合理可行的情况下于上述取消或终止后尽快停止处理您的个人信息，前提是我们合理要求保留您的数据副本，以用于存档目的，为应对任何实际发生的或潜在的纠纷，以用于遵守适用的法律和法规目的，或用于执行我们与您达成的任何协议目的，为保护我们的权利、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、义务目的。我们也可能为了我们的合法利益继续处理您的个人信息，如本隐私声明中所详述。

## **Storage and third parties**

### 存储和第三方

Vistra China may store your personal information for processing in our local servers and Vistra Group databases, or entrust 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 “Cross-border transfer of your personal information” above in this regard). In particular:

在我们有合同安全措施并保证适当的安全措施到位的情况下，瑞致达中国可能会将您的个人信息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，或委托给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「跨境传输您的个人信息」一节中的条款)。具体而言：

- where we have collected your personal information as required by anti-money laundering legislation, including for identification, screening and reporting, we will

retain that personal information 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信息，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信息至少七 (7) 年，除非有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 information 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信息七 (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 merger, acquisition or liquidation of Vistra China, while our corresponding retention period has not expired, we may transfer your personal information to our successor(s) in order to continue our obligations under any Terms and Conditions with you and as may be required by any applicable laws or regulations.

倘瑞致达中国发生任何合并、收购或清算，在我们相应保留期限未届满时，我们可能会根据任何适用法律或法规将您的个人信息转让给我们的继任者，以持续履行我们与您签订的任何条款条件项下和任何适用法律法规可能要求的义务。

If any corresponding retention period has expired, or if we cease to operate without any successor, we will delete all your personal information at such point of time.

如任何相应保留期限已届满，或我们在无任何继任者的情况下停止经营，则我们将在该时间点删除所有您的个人信息。

[END]

[完]