



**We Connect,  
You Win**

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**Data Protection and Privacy Notice  
数据保护和隐私条款**

**Edenred Shanghai Co. Ltd.  
雅智捷（上海）企业管理有限公司**

# 1 申明 STATEMENT

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## 1.1 介绍 Introduction

雅智捷（上海）企业管理有限公司（以下简称“Edenred”）尊重我们的客户、合作伙伴、访客以及与我们不时互动或使用我们的产品和服务的其他个人的个人数据的隐私和机密性。我们承诺按照《中华人民共和国网络安全法》的规定，制定相关政策、实施相关流程，以安全地收集、使用和披露您提供给我们个人数据。

We at Edenred Shanghai Co. Ltd. (“Edenred”) respect the privacy and confidentiality of the personal data of our clients, partners, visitors and other individuals whom we interact with from time to time or in the course of providing our products and services. We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the Network Security Law of People’s Republic of China.

## 1.2 我们如何收集您的个人数据 How Do We Collection your Personal Data

个人数据是指（a）单独（如身份证号码）或（b）与其他信息（如全名+地址）结合使用时，能够唯一识别个人身份的任何信息。

Personal data refers to any information that can uniquely identify an individual person either (a) on its own (e.g. ID No.), or (b) when combined with other information (e.g. Full Name + Full Address).

我们可能在以下情况下收集您的个人资料：

- 访问我们的网站并留下您的联系信息；
- 就我们的服务或服务质量向我们提供反馈；
- 通过电子邮件或书面信函与我们沟通；
- 向我们提交您的简历和工作申请表，成为我们的员工；
- 当您提交与我们的任何产品或服务有关的表格时；
- 当您在我们拥有或运营的网站上注册或使用我们的任何服务时，或当您注册为我们拥有和/或运营的网站的成员时，或当您在此类网站上使用服务时；
- 当您与我们的客户服务人员互动时；
- 当您使用我们的某些服务时，例如我们的订阅服务；
- 当您与我们建立任何在线账户时；
- 当您要求我们联系您时；
- 当我们的营销代表和代理商与您联系并回复您时；
- 当您回复我们的额外个人数据请求时
- 当您要求包含在电子邮件或其他邮件列表中时；
- 当您响应我们的促销和其他计划时；
- 当我们收到业务合作伙伴和第三方的推荐信时，例如，他们推荐了您；
- 当您出于任何其他原因向我们提交您的个人数据时。

We may collect your personal data when you:

- Visit our websites and leave behind your contact information;
- Provide us with feedback on our services or quality of service;
- Communicate with us via emails or written correspondences;
- Submit your CV and job application form to us to be our employee;
- When you submit forms relating to any of our products or services;
- When you register for or use any of our services on websites owned or operated by us or when you register as a member of websites owned and/or operated by

us, or use services on such websites;

- When you interact with our customer service officers;
- When you use some of our services, e.g. our subscription service;
- When you establish any online accounts with us;
- When you request that we contact you;
- When you are contacted by, and respond to, our marketing representatives and agents;
- When you respond to our request for additional Personal Data
- When you ask to be included in an email or other mailing list;
- When you respond to our promotions and other initiatives;
- When we receive references from business partners and third parties, for example, where you have been referred by them;
- When you submit your Personal Data to us for any other reason.

### **1.3 我们为什么要收集您的个人数据 Why Do We Collect Your Personal Data**

- 回应您的询问和请求，并回应投诉；
- 促进商业资产交易（可扩展至任何合并、收购或资产出售）；
- 为本文所列任何目的的匹配与您相关的任何个人数据；
- 核实你的身份；
- 预防、侦查和调查犯罪，包括欺诈和洗钱，分析和管理其他商业风险；
- 保护和执行我们的合同和法律权利和义务；
- 对我们的内部流程、行动计划和管理商业风险进行审计、审查和分析；
- 预防、侦查和调查犯罪，管理我们的场所和服务的安全和安保（包括但不限于进行闭路电视监控和进行安全检查）
- 遵守任何适用的规则、法律法规、业务守则或指导方针，或协助有关当局执法和调查；和/或
- 与上述任何目的有关的任何其他目的。
- Responding to your queries and requests and responding to complaints;
- Facilitating business asset transactions (which may extend to any merger, acquisition or asset sale);
- Matching any Personal Data held which relates to you for any of the purposes listed herein;
- Verifying your identity;
- Preventing, detecting and investigating crime, including fraud and money-laundering, and analyzing and managing other commercial risks;
- Protecting and enforcing our contractual and legal rights and obligations;
- Conducting audits, reviews and analysis of our internal processes, action planning and managing commercial risks;
- Preventing, detecting and investigating crime and managing the safety and security of our premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances)
- Compliance with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities; and/or
- Any other purpose relating to any of the above.

### **1.4 我们收集的个人信息类型 Types of Personal Data We Collect**

我们收集的有关您的个人数据类型包括：

- 个人联系信息（姓名、地址、公司名称、电话号码、电子邮件地址）
- 个人信息（姓名、性别、出生日期、国籍）
- 求职者的学历和专业资格
- 求职者的专业和工作经验

The types of personal data we collect about you include:

- Personal contact information (Name, Address, Company Name, Phone No., Email Address)
- Personal details (Name, Gender, Date of Birth, Nationality)
- Job Applicant's educational and professional qualifications
- Job applicant's professional and work experience

## **1.5 我们如何使用您的个人数据 How We Use Your Personal Data**

我们将您提供的个人数据用于以下一个或多个目的：

- 调查投诉、索赔和争议
- 管理和改进我们的业务和运营，以更好地为您服务或增强客户体验
- 处理工作申请、招聘和甄选
- 满足法律要求的情况下使用

We use the personal data you provide us for one or more of the following purposes:

- Investigate complaints, claims and disputes
- Manage and improve our business and operations to serve you better or enhance client experience
- Process job applications, recruitment and selection
- Fulfil legal requirements

## **1.6 我们向谁披露您的个人数据 Who We Disclose Your Personal Data To**

我们将您提供给我们的一些个人数据披露给Edenred以外的以下实体或组织，以便履行我们对您的服务：

- 我们的关联公司和附属公司
- 服务供应商

如果法律要求，我们可以向有关当局或执法机构披露您的个人资料。

We disclose some of the personal data you provide us to the following entities or organisations outside Edenred in order to fulfil our services to you:

- Our associated and affiliated companies
- Service Vendors

Where required to do so by law, we may disclose personal data about you to the relevant authorities or to law enforcement agencies.

## **1.7 我们如何管理您个人数据的收集、使用和披露 How We Manage the Collection, Use and Disclosure of Your Personal Data**

### **1.7.1 获得同意 Obtaining Consent**

Before we collect, use or disclose your personal data, we will notify you of the purpose why we are doing so. We will obtain written confirmation from you on your expressed consent. We will not collect more personal data than is necessary for the stated purpose. We will seek fresh consent from you if the original purpose for the

collection, use or disclosure of your personal data has changed.

在我们收集、使用或披露您的个人资料前，我们会通知您我们这样做的目的。我们将得到你方的书面确认。我们不会收集超过所述目的所需的个人资料。如果收集、使用或披露您个人资料的最初目的发生变化，我们将重新征求您的同意。

Under certain circumstances, we may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g. when you submit a job application form or your CV to our HR Department.

在某些情况下，如果您自愿为所述目的提供您的个人资料，例如您向我们的人力资源部门提交工作申请表或简历，我们可能会假定您同意。

### **1.7.2 撤回同意 Withdrawal of Consent**

如果你想撤回同意，你应该提前合理的通知我们。我们将告知您撤回同意的可能后果，例如，如果没有您的个人联系信息，我们可能无法就我们的新服务与您联系，或就我们的客户相关事宜与您进行跟进。

If you wish to withdraw consent, you should give us reasonable advance notice. We will advise you of the likely consequences of your withdrawal of consent, e.g. without your personal contact information we may not be able to contact you relating to our new services or follow up with you on our client-related matters.

您撤回同意的请求可以通过电子邮件或信函的形式发送给我们。

Your request for withdrawal of consent can take the form of an email or letter to us.

### **1.7.3 Cookie的使用 Use of Cookies**

我们可能在我们的网站或在线服务上使用“cookies”收集有关您的在线活动的信息。cookie是由网站创建的一个小文本文件，存储在您的计算机中，为网站提供一种识别您并跟踪您的首选项的方法。使用Cookie会给您带来方便，这样您就不必在重新访问网站或填写电子表格时重新键入相同的信息。

We may use “cookies” to collect information about your online activity on our website or online services. A cookie is a small text file created by the website that is stored in your computer to provide a way for the website to recognise you and keep track of your preferences. The cookie makes it convenient for you such that you do not have to retype the same information again when you revisit the website or when you fill in electronic forms.

我们使用的大多数cookies都是“会话cookies”，会话结束时会自动从计算机硬盘中删除。

Most cookies we use are “session cookies”, which will be deleted automatically from the hard disk of your computer at the end of the session.

通过在web浏览器中关闭此功能，您可以选择不接受Cookie。请注意，这样做，您可能无法使用我们的web应用程序中的某些特性和功能。

You may choose not to accept cookies by turning off this feature in your web browser. Note that by doing so, you may not be able to use some of the features and functions in our web applications.

## **1.8 我们如何确保您个人数据的准确性 How We Ensure the Accuracy of Your Personal Data**

我们会采取合理措施，以确保我们收集的有关您的个人资料是准确、完整和最新的。

We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete and kept up-to-date.

我们可能会不时为您做数据验证，以更新我们持有的有关您的个人数据的任何更改。如果我们与您保持着持续的关系，您向我们更新您的个人数据的任何更改（例如您的邮寄地址的更改）非常重要。

From time to time, we may do a data verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us of any changes to your personal data (such as a change in your mailing address).

### **1.9 我们如何保护您的个人数据 How We Protect Your Personal Data**

我们已实施适当的信息安全和技术措施（如数据加密、防火墙和安全网络协议），以保护我们持有的有关您的个人数据不受丢失、误用、破坏、未经授权的更改/修改、访问、披露或类似风险的影响。

We have implemented appropriate information security and technical measures (such as data encryption, firewalls and secure network protocols) to protect the personal data we hold about you against loss; misuse; destruction; unauthorised alteration/modification, access, disclosure; or similar risks.

我们还制定了合理和适当的组织措施，以维护您个人数据的机密性和完整性，并且只在“需要知道”的基础上与授权人员共享您的数据。

We have also put in place reasonable and appropriate organisational measures to maintain the confidentiality and integrity of your personal data and will only share your data with authorised persons on a ‘need to know’ basis.

我们还提供了适当的加密解决方案，以保护我们存储和/或传输的您的个人数据。我们将根据技术进步不时审查这些加密解决方案。我们的员工会不时接受关于加密的使用和重要性的教育，以确保您的个人信息通过加密得到很好的保护。

We have also put in place appropriate encryption solution to protect your personal data we store and/or transmit. Such encryption solutions are under review in accordance with the technology advancement. Our employees are educated from time to time on the use and importance of encryption to ensure your personal are well protected through.

### **1.10 我们如何保留您的个人数据 How We Retain Your Personal Data**

我们有一个文件保留政策，可以跟踪您以纸质或电子形式向我们提供的个人数据的保留时间表。当您的任何个人资料不再用于任何商业或法律目的时，我们将不会保留您的任何个人资料。

We have a document retention policy that keeps track of the retention schedules of the personal data you provide us, in paper or electronic forms. We will not retain any of your personal data when it is no longer needed for any business or legal purposes.

当达到保留时限，我们将以适当和安全的方式处理或销毁包含您个人资料的此类文件。

We will dispose of or destroy such documents containing your personal data in a

proper and secure manner when the retention limit is reached.

### **1.11 您如何访问、更正和删除您的个人数据 How You Can Access, Correct or delete Your Personal Data**

您可以发邮件给我们，了解我们拥有或控制的您的哪些个人资料，以及我们在过去一年中如何使用和/或披露这些资料。在我们同意您的请求之前，我们可能需要通过检查您的身份证或其他合法身份证明文件来验证您的身份。我们将尽快回复您的请求，或在收到您的请求之日起30天内回复。如果我们不能在30天内做到这一点，我们会让您知道我们需要时间。我们也可能向您收取处理您的访问请求所需的合理费用。

You may write to us to find out what personal data about you that we have in our possession or under our control and how it may have been used and/or disclosed by us in the previous one year. Before we accede to your request, we may need to verify your identity by checking your ID or other legal identification document. We will respond to your request as soon as possible, or within 30 days from the date we receive your request. If we are unable to do so within the 30 days, we will let you know and give you an estimate of how much longer we require. We may also charge you a reasonable fee for the cost involved in processing your access request.

如果您发现我们持有的有关您的个人资料不准确、不完整或不是最新的，您可以要求我们更正这些资料。如果我方有合理理由认为应进行更正，我方将尽快更正数据，或在收到贵方要求之日起30天内更正。

If you find that the personal data we hold about you is inaccurate, incomplete or not up-to-date, you may ask us to correct the data. Where we are satisfied on reasonable grounds that a correction should be made, we will correct the data as soon as possible, or within 30 days from the date we receive your request.

当发生以下情况时，您可以直接要求我们删除您的个人信息，但已做匿名化处理或法律法规另有规定的除外：

- (1) 当我们处理个人信息的行为违反法律法规时；
- (2) 当我们收集、使用您的个人信息，却未征得您的同意时；
- (3) 当我们处理个人信息的行为违反了与您的约定时；
- (4) 当我们终止服务及运营时。

You may directly request us to delete your personal data when the following occurs, unless the data has been anonymized or otherwise provided by laws and regulations:

- (1) When our processing of personal data violates the laws and regulations;
- (2) When we collect and use your personal data without your consent;
- (3) When our processing of personal data violates our agreement with you;
- (4) When we terminate our services and operations.

### **1.12 我们对未成年人的保护 Protection of minors**

未成年人使用我们的产品与/或服务前应取得其监护人的同意。**如您为未成年人，在使用我们的产品与/或服务前，应在监护人监护、指导下共同阅读本隐私政策且应在监护人明确同意和指导下使用我们的产品与/或服务、提交个人信息。**我们根据国家相关法律法规的规定保护未成年人的个人信息，只会法律法规允许、监护人明确同意或保护您的权益所必要的情

况下收集、使用或公开披露未成年人的个人信息。

Minors should obtain the consent of their guardians before using our products and/or services. **If you are a minor, before using our products and/or services, you shall read this privacy policy with the guardianship and guidance of your guardian, and you shall use our products and/or services and submit personal data with the express consent and guidance of your guardian.** We protect the personal data of minors in accordance with relevant laws and regulations of China, and will only collect, use or publicly disclose the personal data of minors at the circumstances that laws and regulations permit and your guardian expressly agrees, or for the purpose to protect your rights and interests.

### 1.13 联系我们 Contacting Us

如果您对本数据保护通知有任何疑问或反馈，或对我们如何管理您的个人数据有任何投诉，请联系我们的数据保护专员（DPO）电子邮箱：[ecn-dpo@edenred.com](mailto:ecn-dpo@edenred.com)

If you have any query or feedback regarding this Data Protection Notice, or any complaint you have relating to how we manage your personal data, you may contact our Data Protection Officer (DPO) at [ecn-dpo@edenred.com](mailto:ecn-dpo@edenred.com)

任何询问或投诉至少应包括以下细节：

- 您的全名和联系方式
- 简要描述您的疑问或投诉

Any query or complaint should include, at least, the following details:

- Your full name and contact information
- Brief description of your query or complaint

我们认真对待此类问题和反馈，并将在合理时间内保密地进行处理。

We treat such queries and feedback seriously and will deal with them confidentially and within reasonable time.

### 1.14 本数据保护和隐私条款的变更 Changes to this Data Protection Notice

我们可能会不时更新此数据保护和隐私条款。如有任何更改，我们会将最新通知张贴在我们的网站上，通过在显著位置提示或向您发送推送消息通知您。**若您继续使用我们的服务，即表示您充分阅读、理解并同意受经修订的此数据保护和隐私条款的约束。**

We may update this Data Protection Notice from time to time. We will notify you of any changes by posting the latest Notice on our website in a prominent position or through pop-ups messages, etc. **If you continue to use our services, that means you have fully read, understood and agreed to be bound by the updated version.**

对本通知所作的更改将在本网站发布或修改之时生效。

Changes to this Notice take effect as and when they are posted or revised on our website.

### 1.15 争议解决 Dispute Resolution

本隐私政策的解释及争议解决均应适用中华人民共和国大陆地区法律。任何因本隐私政策以及我们处理您个人信息事宜引起的争议，您同意通过上海仲裁委员会解决；该仲裁一裁终局，对双方均具有法律约束力。



**Data Protection and Privacy Notice**

**数据保护和隐私条款**

The interpretation and dispute settlement of this privacy policy shall be governed by the laws of the mainland of the people's Republic of China. You agree to settle any dispute arising from this privacy policy and our processing of your personal data through the Shanghai Arbitration Commission, and the arbitration shall be final and legally binding on both parties.

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