

附件 隐私政策
Annex PRIVACY POLICY

1. 引言:

Introduction:

- (a) 世天威物流（上海外高桥保税物流园区）有限公司（“我们”）承诺（i）确保保护我们的客户（及其管理人员、董事、代理、员工和代表）、我们的网站访问者、我们的数字服务（“世天威数字服务”）的用户，以及与我们沟通的所有人员（“您”）交托给我们的、可直接或间接识别，或可能识别自然人的个人数据（“个人数据”），及（ii）遵守适用的隐私法律，包括但不限于《中华人民共和国网络安全法》、《数据安全管理办法（征求意见稿）》、《个人信息出境安全评估办法（征求意见稿）》等以及其他所有适用的关于个人信息保护和数据安全的法律和法规（合称“适用法律”）。我们将定期更新本隐私政策，以确保持续遵守适用法律，并实现我们认为合理必要的任何其他目的。

C.Steinweg Logistics (Shanghai Waigaoqiao Bonded Logistics Zone) Co., Ltd. (“we”, “our” or “us”) is committed to (i) ensuring that we protect personal data which directly or indirectly identify or may identify a natural person (“Personal Data”), which are entrusted to us by our customers (and their officers, directors, agents, employees and representatives), our website visitors, the users of our digital services (“Steinweg Digital Services”) and all those with whom we communicate (“you” or “your”) and (ii) complying with applicable privacy laws, including but not limited to the *Cybersecurity Law of the People’s Republic of China, Administrative Measures for Data Security (Draft for Comment), Measures for Security Assessment for Cross-border Transfer of Personal Information (Draft for Comment)*, etc. and all the other applicable laws and regulations related to personal information protection and data security (collectively, the “Applicable Laws”). We will update this Privacy Policy regularly in order to ensure ongoing compliance with the Applicable Laws and for any other purpose we deem reasonably necessary.

- (b) 本隐私政策是一项外部政策，适用于我们作为个人数据收集者和保管者对于个人数据的处理。我们在本隐私政策的目的范围内，确定处理个人数据的目的和方法属于前述可适用本政策的情形。

This Privacy Policy is an external policy and applies to the processing of Personal Data in which we act as the data collector and keeper. This is the case when we determine the purpose for and the means for the processing of Personal Data within the purposes of this Privacy Policy.

- (c) 世天威数字服务平台也可能包含转到其他网站的链接。本隐私政策不包括任何该等第三方的隐私政策和信息实践。其他网站受自身隐私政策或信息收集实践的约束，可能与我们的隐私政策或信息收集实践有实质性不同。

The Steinweg Digital Services platforms may also contain links to other websites. This Privacy Policy does not cover the privacy policies and information practices of any such third parties. Those other websites are governed by their own privacy policies or information collection practices, which may be substantially different from ours.

- (d) 我们可能会不时更新本隐私政策。在这种情况下，根据下文第 3（d）款的规定，我们将在您下次登录世天威数字服务平台时书面通知您。

We may update this Privacy Policy from time to time. In such case, we will notify you in writing and upon your next login to a Steinweg Digital Services platform, subject to paragraph 3(d) below.

2. 收集的个人信息类型:

Types of Personal Data collected:

- (a) 我们将从您处收集以下类型的个人数据:

We will collect the following types of Personal Data from you:

- 姓名:
name;
- 商用移动电话号码:
business mobile telephone numbers;
- 公司地址;

- company address;
- 公司电子邮件地址;
- company email address;
- 出生日期;
- date of birth;
- 生物识别数据, 包括照片及其他视听资料 (如录音);
- biometric data, including photographs and other audio-visual material (e.g., voice recordings);
- 雇用信息 (公司名称和职务);
- employment information (company name and title);
- 世天威数字服务账户信息;
- Steinweg Digital Services account information;
- 市场偏好;
- marketing preferences;
- 服务器日志;
- server logs;
- 访问者信息;
- visitor information;
- 偏好的沟通方式;
- preferred communication methods;
- 网络跟踪数据
- web tracking data
 - (i) 日志信息 (例如互联网协议 (“IP”) 地址、移动设备 IP 地址、互联网服务提供商、GPS 位置、点击流数据、浏览器类型、版本和语言、查看页面和退出页面以及日期或时间戳、登录信息、时区设置、浏览器插件类型和版本、以及操作系统和平台);
 - log information (such as Internet protocol (“IP”) address, mobile device IP address, Internet service provider, GPS location, clickstream data, browser type, version and language, viewed and exit pages and date or time stamps, login information, time zone setting, browser plug-in types and versions, and operating system and platform);
 - (ii) 访问信息 (例如往返于世天威数字服务平台之间的完整的统一资源定位器点击流 (包括日期和时间)、您查看或搜索的信息、页面响应时间、下载错误、访问某些页面的时长、页面交互信息 (例如滚动、点击和鼠标悬停)、离开页面浏览的方法以及用于呼叫客户服务号码的任何电话号码; 及
 - visit information (such as full uniform resource locators clickstream to, through and from the Steinweg Digital Services platforms (including date and time), information you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number; and
 - (iii) 设备信息 (例如与您用于访问世天威数字服务平台的设备有关的信息, 包括唯一的设备标识符、使用信息 (例如页面请求和在世天威数字服务平台上花费的平均时间)、操作系统、浏览器类型以及设备的移动网络信息和电话号码 (如相关); 及
 - device information (such as information about the device you use to access the Steinweg Digital Services platforms, including unique device identifiers, usage information (such as page requests and average time spent on the Steinweg Digital Services platforms), operating system, browser type and the device’s mobile network information and telephone number (if relevant); and
- 履行我们在适用法律项下义务所需的信息。
- information required to satisfy our obligations under Applicable Laws.

- (b) 我们通常通过使用 Cookie 或者类似的技术 (比如网络信标或者像素标签) 来收集网络跟踪数据。Cookie 是一种可以识别您的设备, 便于您下次访问网站的小文本文件, 它会在您第一次访问网页时被发送到您的计算机或移动设备上的浏览器上。Cookie 可能是临时的, 在您关闭浏览器时会被删除 (即会话 Cookie), 或者保留到您将其删除或其过期时为止 (即永久 Cookie)。网络信标是电子图像, 也称为单像素 GIF。为本隐私政策之目的, 我们将 Cookie 和网络信标称为“Cookie”。

We typically collect web tracking data through the use of cookies or similar technologies, such as web beacons or pixel tags. Cookies are small text files that a website sends to the browser on your computer or mobile device when you first visit a web page so that the website can recognize your device the next time you visit. Cookies may be temporary and deleted when you close your browser (i.e., session cookies) or remain until you delete them or they expire (i.e., persistent cookies). Web beacons are electronic images also known as single-pixel gifs. For the purpose of this Privacy Policy, we will refer to cookies and web beacons as “Cookies”.

- (c) 一般而言, Cookie 不包含可识别的个人信息, 但当您通过世天威数字服务平台提供个人信息时, 此信息可能链接到由世天威数字服务平台发送到您浏览器的 Cookies 所储存的非可识别个人数据。

Generally, Cookies do not contain personally identifiable information, but when you furnish your personal information through a Steinweg Digital Services platform, this information may be linked to the non-personally identifiable data stored in Cookies sent to your browser from a Steinweg Digital Services platform.

- (d) 您可以通过浏览器和/或设备设置查看和管理浏览器 Cookie。但是，如果您阻止或禁用 Cookie，您可能无法充分利用世天威数字服务。

You can view and manage browser Cookies through your browser and/or device settings. However, if you block or disable Cookies, you may not be able to make full use of the Steinweg Digital Services.

3. 个人数据处理的目的:

Purposes of Personal Data processing:

- (a) 我们为下列目的收集并处理个人数据:

We collect and process Personal Data for the following purposes:

- 履行与您的合同关系，例如履行我们与您的合同并处理您的要求；
for the performance of the contractual relationship with you, such as for the fulfilment of our contract with you and the processing of your request;
- 验证您的身份和您的交易指示；
to authenticate your identity and your instructions for transactions;
- 保障世天威数字服务平台安全；
to secure the Steinweg Digital Services platforms;
- 交付我们的服务；
to deliver our services;
- 提供您所要求的信息；
to provide information you request;
- 使您能参与世天威数字服务平台的交互式功能；
to allow you to participate in interactive features on the Steinweg Digital Services platforms;
- 改进世天威数字服务平台的设计、功能、性能和内容；
to improve the design, functionality, performance and content of the Steinweg Digital Services platforms;
- 用于数据分析、测试、研究、统计和调查；
for data analysis, testing, research, statistical and survey purposes;
- 个性化用户体验和衡量整体效果；
to personalise user experience and measure overall effectiveness;
- 与您联系，向您发送关于我们的服务的信息，并向您通知世天威数字服务平台或我们的服务的变更或更新，包括世天威物流（上海外高桥保税物流园区）有限公司的通用条款与条件以及其附件，包括本隐私政策；
to contact you to send you information about our services, and to notify you about changes or updates to the Steinweg Digital Services platforms or our services, including the General Terms and Conditions of C.Steinweg Logistics (Shanghai Waigaoqiao Bonded Logistics Zone) Co., Ltd. and its annexes, including this Privacy Policy;
- 防止、检测、调查并起诉世天威数字服务平台上的或与我们的服务相关的安全威胁、欺诈、不当行为或其他非法或恶意活动；
to prevent, detect, investigate and prosecute security threats, fraud, misconduct or other unlawful or malicious activity on the Steinweg Digital Services platforms or in respect of our services;
- 保护我们的合法权利、财产或安全，或保护第三方；
to protect our legal rights, property or safety, or to protect third parties;
- 遵守我们的法律义务及我们有义务遵守的中国或其他地方的主管监管机构或政府机构的其他规则、法规、行为守则、命令和指示；
to comply with our legal obligations and other rules, regulations, codes of practice, and orders and directions of competent regulatory authorities or governmental bodies in PRC or elsewhere that we are obligated to follow;
- 解决争议并强制执行我们的协议；及
to resolve disputes and enforce our agreements; and
- 用于内部操作和管理目的。
for internal operational and administrative purposes.

就 Cookie 而言，我们专门为以下目的收集并处理 Cookie:

In respect of cookies specifically, we collect and process cookies for the following purposes:

- 验证您的身份，以方便您登录；
to authenticate your identity to facilitate your log-in;
- 提供您所要求的信息； to provide information you request;
- 改进世天威数字服务平台的设计、功能、性能和内容；
to improve the design, functionality, performance and content of the Steinweg Digital Services platforms;
and
- 个性化用户体验和衡量整体效果。
to personalise user experience and measure overall effectiveness.

- (b) 我们所进行的数据处理对我们的业务活动是必不可少的。对于某些个人数据的使用，例如照片、视听资料（例如录音），和生物特征识别方法（例如触摸身份识别技术），系基于我们的合法权益而做出的，旨在当您在使用世天威数字服务平台时确保安全并验证您身份。

The data processing we undertake is necessary for the operation of our activities. The use of certain Personal Data, such as photographs, audio-visual material (e.g. voice-recordings) and biometric authentication methods (e.g. touch ID technology), is based on our legitimate interest to ensure your security and authenticate your identity when using the Steinweg Digital Services platforms.

- (c) 我们有义务按照上述目的及适用法律处理您的个人数据。除为上述目的收集个人数据外，个人数据将不被用作其他用途。如果我们必须或需要将个人数据用于其他目的，我们应当调查拟进行数据处理的目的是否与原始目的一致。在采取进一步处理之前，我们应向您提供个人数据将用于其他目的的相关信息，并在该等数据处理与原始目的不一致时获得您的同意（除非适用法律允许或需要在未取得您同意的情况下，为其他目的对您的个人数据进行进一步的处理）。

We are obligated to process your Personal Data in accordance with the above-mentioned purposes and in compliance with the Applicable Laws. Personal Data may not be processed for other purposes other than that for which they were collected. If there is a necessity or need to process Personal Data for other purposes, we shall investigate whether the purposes of the intended data processing are compatible with the original purposes. Prior to that further processing, we shall provide you with information on those other purposes and obtain your consent if further processing is incompatible with the original purposes (unless further processing for those other purposes without your consent is permitted or required under Applicable Laws).

- (d) 如果您拒绝提供我们认为就我们履行服务、或您访问或使用世天威数字服务确需提供的任何个人数据（或者如果您撤销此前对我们处理该等信息的同意），我们保留拒绝访问世天威数字服务平台和/或拒绝提供我们的服务的权利。

If you refuse to provide any Personal Data that we identify as being required for us to perform our services or for you to access or use the Steinweg Digital Services (or if you withdraw your consent to our processing of such information), we reserve the right to refuse access to the Steinweg Digital Services platforms and/or to refuse to provide our services.

4. 个人数据的使用和共享：

Using and sharing of Personal Data:

- (a) 我们可与我们的关联公司（“世天威集团公司”）以及我们和世天威集团公司的代理、服务提供商（包括供应商、分包商以及分析和搜索引擎提供商、业务合作伙伴）、法定代表人和审计师共享您的个人数据。在此情况下，我们共享的任何信息都将用于本隐私政策中指定的目的。我们将仅在您同意或适用法律法规要求或允许的情况下与其他第三方共享您的个人数据。

We may share your Personal Data with our associated corporations (“Steinweg Group of Companies”) and our and the Steinweg Group of Companies’ agents, service providers (including suppliers, sub-contractors analytics and search engine providers, business partners), legal representatives and auditors. Any information we share in this circumstance will be used for the purposes specified in this Privacy Policy. We will only share your Personal Data with other third parties with your consent or where required or permitted by applicable laws and regulations.

- (b) 我们共享您个人数据的条件是：根据所适用法律，该等披露是为保护和保障我们的权利、财产和安全以及世天威集团公司任何成员或其他人的权利、财产和安全而进行的强制性披露，或经合理判断该等披露确有必要。在某些情况下，个人数据可能会根据司法或其他政府传票、执行令或命令而被披露。

We may share your Personal Data in case such disclosure is mandatory under the Applicable Laws or is reasonably judged to be essential in order to protect and safeguard our rights, property and safety and the rights, property and safety of any member of the Steinweg Group of Companies or of other persons. In certain circumstances, it is possible that Personal Data may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, or orders.

- (c) 向上述实体进行披露可能会导致我们需要将您的个人数据传输至新加坡、欧盟/欧洲经济区（“欧盟/欧洲经济区”）或中国以外的第三国或国际组织，该等转移仅在遵守适用法律，并已采取适当的保护措施，确保达到适用法律所要求的个人数据保护等级时才能进行。

Disclosures to an entity as set out above may entail that we are required to transfer your Personal Data to Singapore, European Union/European Economic Area (“EU/EEA”) or a third country or international organizations outside China, which shall take place only in compliance with the Applicable Laws, and where appropriate safeguards are in place that ensure the level of protection of Personal Data as required by the Applicable Laws

5. 保护您的个人数据:

Securing your Personal Data:

- (a) 我们以谨慎和保密的方式处理个人数据，并使用所有适当且先进的物理、管理和技术保护措施（如加密、SSL证书和三步认证程序）来保护您个人数据的完整性和安全性。

We handle Personal Data carefully and confidentially, and use all suitable and state-of-the-art physical, managerial, and technical safeguards (e.g. encryption, SSL certificates and three-step authentication procedures) to preserve the integrity and security of your Personal Data.

- (b) 我们已制定程序，以努力采取保护措施并防止未经授权的访问，维护数据安全，并正确使用我们收集的信息。我们也采取合理的步骤，以确保与我们合作的第三方保护您的个人数据的安全。

We have put in place procedures in an effort to safeguard and help prevent unauthorised access, maintain data security, and correctly use the information we collect. We also take reasonable steps to help make sure that third parties we work with protect the security of your Personal Data.

- (c) 如果我们为您提供了（或您已选择）密码和其他唯一标识符，使您能够访问世天威数字服务平台的某些部分，您应负责对此密码保密。我们要求您不要与任何人共享密码，并在您退出世天威数字服务平台时注销您的用户帐户并关闭浏览器窗口。如果您使用的是共享的或可公开访问的计算机或其他设备，我们要求您确保在关闭访问世天威数字服务平台的浏览器时，清空此类计算机或设备上的高速缓存，以使得此类计算机或设备的后续用户无法查看世天威数字服务平台环境的内容。

Where we have given you (or where you have chosen) a password and other unique identifiers which enable you to access certain parts of the Steinweg Digital Services platforms, you are responsible for keeping this password confidential. We ask you not to share the password with anyone, and to sign out of your user account and close your browser window when you wish to exit the Steinweg Digital Services platform. If you are using a shared or a publicly accessible computer or other device, we ask that you ensure that the cache memory on such computer or device is emptied when you close the browser on which the Steinweg Digital Services platform was accessed in order that the contents of the Steinweg Digital Services platform environment may not be viewed by subsequent users of such computer or device.

6. 个人数据的保存: 我们使用和存储个人数据的时间不得超过实现本隐私政策规定的目的的必要时时间、或我们为遵守合同义务所必需的时间、或所适用法律允许或要求的时间，并应在该等期限到期之后移除已收集的个人信息。即使您已停用您在我们平台的帐户，您的个人信息也可能依此原则储存。只要为法律或特定商业目的（包括适用法律法规允许我们为履行与您签订的合同而保留个人信息的情形）所必需，我们即可保留个人信息。

Retention of Personal Data: We will not use and store Personal Data longer than necessary to fulfil the purposes stated in this Privacy Policy, or longer than necessary to comply with contractual obligations or as permitted or required by the Applicable Laws, and shall remove the collected Personal Data after such period. Personal Data may be stored in accordance with this principle, even where you have deactivated your account with us. We may retain Personal Data for as long as retention is necessary for legal or business purposes (including where we are permitted under applicable laws and regulations to enforce our contract with you).

7. 您对个人数据的权利:

Your rights regarding your Personal Data:

(a) 对于您的个人数据，您拥有以下权利：

In relation to your Personal Data, you have the following rights:

- 访问权；
right to access;
- 更正权；
right to rectification;
- 清除权（被遗忘权）；
right to erasure (right to be forgotten);
- 反对或限制数据处理权（或撤销先前所给予的同意之权利）；及
right to object against or restrict processing (or withdraw an earlier given consent); and
- 数据迁移权。
right to data portability.

您可书面联系我们的数据隐私管理人员（参见下文第 8 条）以行使该等权利。为了保护您的隐私和安全，我们将采取合理措施，在处理根据本第 7 条提出的任何要求之前核实您的身份。请注意，在法律允许的情况下，我们保留就处理您的要求而产生的成本向您收取象征性费用的权利。

You can exercise these rights by contacting our privacy officer in writing (see paragraph 8 below). To protect your privacy and security, we will take reasonable steps to verify your identity before processing any request under this paragraph 7. Please note that, where permitted by law, we reserve the right to charge a nominal fee in respect of our costs in processing your request.

(b) 请注意，根据您的要求和您所处的地点及适用法律法规：

Please note that, depending on your request and based on your location and applicable laws and regulations:

- 我们可能有合法理由拒绝您的要求；以及
there may be lawful grounds for us to refuse your request; and
- 我们的响应时间可能会有所不同。如果需要的时间超过适用法律法规所允许的时间，我们将通知您延误的原因。
our response times may vary. Should we require more time than what is permitted by applicable laws and regulations, we shall inform you of the reasons for the delay.

(c) 如果您认为我们未遵守隐私和数据保护规定，您可向我们的数据隐私管理人员（见下文第 8 条）或当地数据保护机关提出投诉。

If you believe that we do not comply with privacy and data protection regulations, you may file a complaint with our privacy officer (see paragraph 8 below) or alternatively with the local data protection authority.

8. 联系我们:

Contacting us:

我们已制定了适当的程序，用于处理与收集或使用您的个人数据、或本隐私政策有关的任何问题或意见。如您对本隐私政策有任何疑问或意见，或要求行使您个人数据的相关权利，您可致电我们的数据隐私管理人员：

We have a procedure in place for any questions or remarks regarding the collection or use of your Personal Data or regarding this Privacy Policy. If there are any queries or remarks about this Privacy Policy; or for requests to exercise your rights relating to your Personal Data, you may contact our privacy officer at:

世天威物流（上海外高桥保税物流园区）有限公司
C.Steinweg Logistics (Shanghai Waigaoqiao Bonded Logistics Zone) Co., Ltd.
办公地址：中国(上海)自由贸易试验区申亚路 89 号
Office address: No.89 Sheny Road, China (Shanghai) Pilot Free Trade Zone
电子邮件/Email Address: support@steinwegonline.com