

KDI China Customer Privacy Notice



KONGSBERG

康士伯数字中国客户隐私政策

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Kongsberg Digital Technology Service (Beijing) Co., Ltd. (“**KDI China**” or “**We**”) are committed to being responsible for processing your personal information.

康士伯数字技术服务（北京）有限公司（“**康士伯数字中国**”或“**我们**”）承诺将负责地处理您的个人信息。

Before you use or submit any information, please carefully review this Privacy Notice (this “**Notice**”). We will continue to evaluate this Notice to reflect our personal information processing activities, and we may make changes to this Notice accordingly. Any changes will be made on this page and you should check this page periodically for updates. If we make material changes to this Notice, we will provide you with notice when required by law.

在使用和提供任何个人信息之前，请您仔细阅读本隐私政策（以下简称“**政策**”）。我们会持续评估本政策，使其充分反映我们的个人信息处理活动，并且我们会根据服务的更新情况，适时修改本政策的条款。您应定期检查此页面以获取政策的更新。如果我们对本政策做出重大变更，我们会依照法律的要求向您发出通知。

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1. Application and definition

1. 适用范围和定义

This Notice governs and describes KDI China's practices (as a personal information processor under China's data and privacy law) in connection with personal information that we collect and process from the relevant individuals our customers (such as contact persons) in Mainland China.

本政策描述了康士伯数字中国作为中国数据和隐私法项下的个人信息处理者，如何处理客户相关个人（如企业联络人）的个人信息。

Definitions of "personal information", "sensitive personal information", and "processing" in this Notice are set out as follows and are consistent with the definitions in the relevant laws.

本政策中的“个人信息”、“敏感个人信息”以及“处理”定义与相关法律中的定义一致，具体如下：

- Personal information: refers to various types of information recorded in electronic or other ways that are related to an identified or identifiable natural person, but excluding anonymized information.

“个人信息”是指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，不包括匿名化处理后的信息。

- Personal information processor: refers to an organization or individual that independently decides on the processing purposes and processing methods during personal information processing activities.

“个人信息处理者”是指在个人信息处理活动中独立决定处理目的和处理方法的组织或个人。

- Sensitive personal information: refers to personal information that, if leaked or used illegally, may easily lead to an infringement upon the human dignity of a natural person or endangerment of the safety of his/her body or property, including information on biometric identification, religious beliefs, specific identity, health care, financial accounts, and personal whereabouts, and personal information of minors under the age of fourteen. **Sensitive personal information is in bold and underlined to draw your attention.**

“敏感个人信息”是一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。对于敏感个人信息，**我们将会以加粗下划线的方式提醒您注意。**

- Processing: includes personal information collection, storage, use,

processing, transmission, provision, disclosure and deletion, etc.

个人信息的“处理”包括个人信息的收集、存储、使用、加工、传输、提供、公开、删除等。

2. How we collect and use your personal information

2. 我们如何收集和使用您的个人信息

We will only collect and process your personal information for the following purposes described in this Notice in accordance with the principles of lawfulness, legitimacy, necessity and good faith and in compliance with applicable laws and regulations.

我们将秉持合法、正当、必要原则，遵守适用法律法规的要求，基于下述目的收集和使用您的信息：

- 2.1. When we establish a business partnership with your company, we need to create a profile of your company in our system, for which we will collect your name, title, company, and your contact information (e.g., phone number, email address).

当我们与您的公司建立业务合作关系时，我们需要在系统当中为您所在的公司建立档案，为此我们将收集您的姓名、职位、公司，以及联系方式（电话号码、电子邮箱地址）。

- 2.2. We may conduct digital marketing to your company and in order to provide such service, we need to collect name, title, phone number, email address, company, and other contact information.

我们可能向您所在的公司进行电子营销，为了向您提供该服务，我们需要收集您的姓名、职位、电话号码、电子邮箱地址、公司，以及其他联系信息。

- 2.3. When doing business with your company, we may be required by law to carry out compliance due diligence on your company, for which we will need to collect your date of birth, name, title, and your email address and telephone number (for contact person).

在与您的公司开展业务合作时，我们可能出于法律规定对您的公司开展合规尽职调查，为此我们需要收集您的出生日期、姓名、职位，以及您的电子邮箱地址和电话号码（如您为公司联络人）。

- 2.4. In order to conduct potential internal investigations or audits, we may look at company financial records and email correspondence to determine potential misconduct, which may involve your date of birth, name, title, travel details, and your email address and telephone number (for business related person).

为了开展潜在的内部调查或审计，我们可能会查看公司财务记录和电子邮件通信，以确定潜在的不当行为，其中可能涉及您的出生日期、姓名、职位，行程详情以及您的电子邮箱地址和电话号码（如您为业务人员）。

2.5. **Circumstances Where Consent Is Not Required**

不需要同意的情况

Pursuant to the applicable laws and regulations, we may process your personal information under any of the following circumstances without your consent:

根据适用的法律和法规，我们可以在以下未经您同意的情况下处理您的个人信息：

- Where it is necessary for carrying out human resources management under our legally-established company employment policy or a legally-concluded collective contract;

按照我们依法制定的劳动规章制度和依法签订的集体合同实施人力资源管理所必需；

- Where it is necessary for us to perform a statutory responsibility or statutory obligation;

为履行我们的法定职责或者法定义务所必需；

- Where it is necessary for us to respond to a public health emergency, or for protecting the life, health or property safety of you in the case of an emergency;

为我们应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；

- Where your personal information is processed within a reasonable scope to carry out any news reporting, supervision by public opinions or any other activity for public interest purposes;

- 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理您的个人信息；

- Where the personal information, which has already been disclosed by yourself or otherwise legally disclosed, is processed within a reasonable scope and in accordance with the Personal Information Protection Law; or

根据《个人信息保护法》的规定，在合理的范围内处理个人自行公开或者其他已经合法公开的个人信息；或

- Any other circumstance as provided by applicable laws and regulations.

法律、行政法规规定的其他情形。

2.6. We need to process the sensitive personal information mentioned above (**information in bold and underlined**), otherwise we will not be able to provide you with the corresponding services.

我们需要处理上述敏感个人信息（**加粗、标示下划线的信息**），否则将无法为您提供相应的服务。

As you are aware, if sensitive personal information is leaked or illegally used, it may have a certain impact on the dignity, personhood, and property security of you.

您已知晓，敏感个人信息一旦泄露或者非法使用，可能对您的人格尊严或者人身、财产安全造成一定影响。

3. How we share your personal information

3. 我们如何共享您的个人信息

In order to achieve the purposes above, we may entrust third-party service providers to assist us in providing relevant operation and service support. Such third parties entrusted by us include IT service providers and compliance service providers, etc. For companies, organizations and individuals who we entrust to process your personal information, we ask them to handle your personal information in accordance with our instructions, this Notice and applicable laws.

我们可能需要在受我们的委托处理个人信息的第三方服务供应商（例如 IT 服务供应商、合规服务供应商等）的协助下实现前述目的。对于受我们的委托处理个人信息的公司、组织和个人，我们会要求他们按照我们的要求、本政策以及法律的要求来处理个人信息。

We may also provide your personal information to our overseas affiliates for purposes such as customer relationship maintenance, as described in Chapter 7 “How we transfer your personal information overseas” of this Notice.

我们还可能基于客户关系维护等目的向境外关联公司提供您的个人信息，具体情况请参见本政策第七章“我们如何将您的个人信息传输至境外”。

4. How we store your personal information

4. 我们如何保存您的个人信息

We will take necessary security measures to ensure the safety of your personal information.

我们将采取必要的安全措施确保您的个人信息的安全。

We only retain your personal information within the minimum period which is

necessary for the fulfillment of the purposes stated in this Notice. Meanwhile, we will also store your personal information with adherence to the mandatory provisions about the retention period rising from applicable laws and regulations. Once expired, we will delete your personal information or anonymize it.

我们仅在实现本政策所述目的所需的最短期限内保留您的个人信息。同时，我们还将根据相关法律法规中有关保留期限的强制性规定存储您的个人信息。一旦到期，我们将删除您的个人信息或对您的个人信息进行匿名化处理。

5. How we protect your personal information

5. 我们如何保护您的个人信息

We have implemented industry accepted administrative, technical, and physical security measures to protect the personal information you provide and to prevent the data from being accessed, disclosed publicly, used, modified, damaged or lost without authorization. We will take all reasonable and practicable measures to protect your personal information.

我们已采取了行业公认的行政、技术和物理安全措施保护您提供的个人信息，以防止遭到未经授权访问、公开披露、使用、修改、损坏或丢失。我们将采取一切合理可行的措施保护您的个人信息。

However, we cannot and do not guarantee that these measures will provide absolute security. Where a personal information security incident occurs unfortunately, we will inform you as required by the laws and regulations via mail, letter, telephone, pushed notification or other available means. Where it is difficult to inform the subjects of the personal information one by one, we may publish an announcement in a reasonable and effective way. Where required by law, we will also report the treatment result of the personal information security incident.

但是，我们也不能保证这些措施将提供绝对安全。如不幸发生个人信息安全事件，我们将按照法律法规的要求及时向您告知相关情况，难以逐一告知您时，我们会采取合理、有效的方式发布公告。同时，我们还将按照法律法规和监管部门要求，上报个人信息安全事件的处置情况。

6. Your choices and rights

6. 您的选择和权利

根据相关法律，您对您的个人信息享有如下权利：

1) the right to know and the right to decide on the processing of your personal information;

您对您的个人信息的处理享有知情权、决定权；

2) the right to restrict or refuse the processing of your personal information by others;

您有权限制或者拒绝我们对您的个人信息进行处理；

3) the right to consult and duplicate your personal information;

您有权查阅、复制您的个人信息；

4) the right to request personal information processors to correct or supplement your personal information where you discover the information is incorrect or incomplete;

若您发现您的个人信息不准确或者不完整的，您有权请求我们进行更正、补充；

5) the right to withdraw your consent to the processing of personal information based on your consent (but please note that your withdrawal of consent does not affect the validity of the processing of personal information that has been carried out based on your consent before the withdrawal);

对基于您同意而进行的个人信息处理活动，您有权撤回同意（但请您注意，您撤回同意的，不影响撤回前基于您同意已进行的个人信息处理活动的效力）；

6) the right to request the transfer of personal information to your designated personal information processors;

您有权请求将个人信息转移至您指定的其他个人信息处理者；

7) the right to delete your personal information under specific circumstances.

您有权在特定情况下要求我们删除您的个人信息。

If you want to exercise your rights above, please contact us via the contact information provided in this Notice. To protect the security of your personal information, we need to verify your identity in order to respond to your rights request(s), and we may not be able to respond to the request(s) for rights related to personal information that are not from you or authorized by you (for example, requests to consult personal information of someone else).

如果您想行使上述权利，请通过本政策中提供的联系信息与我们联系。为保障您的个人信息安全，我们需要核实您的身份以响应您的权利请求，我们可能无法响应非本人或非经本人授权的个人信息相关权利请求（例如请求查看他人的个人信息）。

Additionally, the rights above are subject to limitations and exceptions under applicable law. We will respond to and comply with your request(s) consistent with applicable law as soon as reasonably practicable. If you have unresolved concerns, you also have the right to complain to relevant supervisory authorities or where applicable, file a lawsuit with the court in accordance with applicable law.

此外，上述权利可能会受到相关法律的额外限制。我们将在合理可行的情况下尽快根据相关法律回应并响应您的请求。如果您仍有未解决的问题，您也有权向相关监管机构投诉，或根据相关法律向法院提起诉讼。

7. How we transfer your personal information overseas

7. 我们如何将您的个人信息传输至境外

For the purposes stated in this Notice, we may transfer your personal information to our headquarter located outside of mainland China, i.e., Kongsberg Gruppen ASA and Kongsberg Digital AS. Where personal information is transferred to another jurisdiction outside mainland China, your personal information will be secured by appropriate safeguards as set forth under applicable law, including without limitation, where applicable by the use of the standard contract officially published by the supervisory authority for the transfer of information between mainland China and other jurisdictions. To the extent required under applicable law, we will obtain separate consent from you before the transfer of your personal information.

出于本政策所述的目的，我们可能会将您的个人信息传输到我们位于中国大陆以外的总部，即 Kongsberg Gruppen ASA 与 Kongsberg Digital AS。当个人信息被传输到中国大陆以外的另一个司法管辖区时，您的个人信息将受到适用法律规定的适当保护措施的保护，包括但不限于：在适用的情况下，使用监管机构正式发布的用于在中国大陆和其他司法管辖区之间传输信息的标准合同。在适用法律规定的范围内，我们将在传输您的个人信息之前征得您的单独同意。

Name of the recipient 境外接收方名称	Contact information 联系方式	Purpose and means of processing 处理目的及方式	Types of personal information 个人信息种类	Country/region 境外接收方所在国家/地区
Kongsberg Digital AS	privacy@kongsberg.com	Customer relationship maintenance and digital marketing 客户关系维护、电子营销	name, title, phone number, email, company, and other contact information 姓名、职位、电话号码、电子邮件、公司，以及其他联系信息	Norway 挪威

Kongsberg Gruppen ASA	privacy@kongsberg.com	business compliance due diligence 企业合规尽职调查	contact person's date of birth, name, title, and your email address and telephone number) 公司联络人的出生日期、姓名、职位，以及您的电子邮件地址和电话号码	Norway 挪威
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8. Updates to this Notice

8. 本政策的更新

We reserve the right to update this Notice at any time, and we may modify the terms of this Notice in a timely manner based on updates to our services, technological advancements, data processing practices, and relevant legal requirements. We will provide you with a new Privacy Notice in accordance with applicable laws for any changes made. We may also inform you from time to time about how your personal information is being processed through other means.

我们保留在任何时候更新本政策的权利，我们可能会根据服务的更新情况、科技的发展进步、数据处理的实践及法律法规的相关要求适时修改本政策的条款。我们将根据法律的相关规定，向您提供新的隐私政策。我们也可能不时地以其他方式告知您关于您的个人信息的处理情况。

9. Contact us

9. 联系我们

If you have questions about this Notice or wish to contact us for any reason in relation to our personal information processing, please contact us at privacy@kongsberg.com, or via physical address:

Corporate Privacy Officer Kongsberg Gruppen ASA
P.O.Box 1000
3601 Kongsberg

如果您对本声明有疑问，或因任何涉及到个人信息处理的问题希望与我们联系，请通过以下方式与我们联系：privacy@kongsberg.com，或通过如下邮箱地址：

Corporate Privacy Officer Kongsberg Gruppen ASA
P.O.Box 1000
3601 Kongsberg