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Website Data Protection Policy 网站数据保护政策	2	28-Sept.-2018	1 of 7	xxx

## Introduction 引言

BWI uses reasonable measures to safeguard personal information that is provided online. BWI understands the premium placed on protecting personal information on the Internet, and this policy lets you know what information we collect, how we process and safeguard it, and how you may exercise your rights to access, update, correct or erase your information. Thus, BWI encourages anyone who accesses our site to read this privacy policy, so that you may understand how we use personal information provided to us through the website.

BWI 采取合理的措施保护在线提供的个人信息。BWI 了解保护互联网上个人信息的重要性，本政策旨在让您了解我们会收集什么信息，我们如何处理和保护该等信息，以及您如何行使您的权利访问、更新、改正或删除您的信息。因此，BWI 鼓励访问我们网站的每一个人阅读本隐私政策，以了解我们如何使用网站向我们提供的信息。

BWI Group is the owner of the data and may share the information (specifically information gained via cookies) with our business partners.

BWI 集团是数据的所有人，可向我们的商业伙伴分享信息（尤其是通过 cookies 获得的信息）。

## What is personal data? 什么是个人数据？

Personal data means any information relating to any living individual (also known as a 'data subject') who can be identified (directly or indirectly) in particular by reference to an identifier (e.g. name, NI number, employee number, email address, physical features) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

个人数据是指与能够（直接或间接）识别尤其是参考某一身份识别信息（例如姓名、NI 编号、工号、电子邮件地址、外貌特征等）识别出身份的任何生命个体（也称之为“数据主体”）有关，或者与一项或多项生理、心理、基因、精神、经济、文化或社会身份因素有关的任何信息。

Personal data may be automated (e.g. electronic records such as computer files or in emails) or in manual records which are part of a filing system or are intended to form part of a filing system (e.g. structured paper files and archives).

个人数据可为自动生成（例如计算机文档或电子邮件等电子记录），也可为属于备案系统组成部分或者拟成为备案系统组成部分的人工记录（例如结构化纸质文件和档案）。

## What does 'processing' personal data mean? “处理”个人数据是指什么？

'Processing' personal data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“处理”个人数据是指对个人数据或者一系列个人数据进行的任何操作或者一系列操作（无论是否通过自动方式进行），例如收集、记录、组织、整理、存储、改编或修改、检索、查阅、使用、通过传输披露、传播或者以其他方式提供、整合或合并、限制、删除或销毁。

## Obtained information 信息的获取

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In order to provide services to you, we may need to process data about you which may in some parts contain personal information. If so, we will only do so that we can respond to you, evaluate your application/CV, or engage in the requested service.

为了向您提供服务，我们可能需要处理与你有关的个人数据，而其中有些部分可能包含个人信息。如包含，我们对您个人数据的使用仅限于向您给予答复、评估你的申请/简历或者提供您要求的服务。

The following personal information may be processed by us:

我们可能处理的个人信息如下：

- Information provided voluntarily by you such as your name, user name, email address and mobile telephone number via you using our website or via your completed job application or CV.
- 您通过使用我们的网站或者填写求职信或简历，自愿提供的信息，例如您的姓名、用户名、电子邮件地址、手机号码。
- Information automatically collected from you
- 我们自动从您收集的信息
  - o When you access our website, we may automatically collect additional information about you which may contain personal information which is automatically recognized by our server, such as:
  - o 当您访问我们的网站时，我们可能自动收集与您有关的其他信息，其中可能包含我们的服务器自动确认的个人信息，例如：
    - Your IP address; 您的 IP 地址;
    - Device type, name, and IDs 设备类型、名称和 ID
    - Date and time of your requests 请求日期和时间
    - Content of your requests 请求内容
    - Information on your browser version 浏览器版本信息
    - Screen resolution 屏幕分辨率
    - Information on your operating system, including language settings 操作系统信息，包括语言设置
- Uses of your information: We will process your information in order to identify you and communicate with you.
- 您信息的使用：我们处理您的信息是为了识别你的身份并与您沟通。

## Automated decision making 自动化决策

BWI will not use your personal data for automated individual decision – making, including profiling, which produces legal effects concerning you or significantly affects you.

BWI 不使用您的个人数据进行可产生与你有关或者对您有重大影响的法律效力的自动化个人决策，包括分析。

## Cookies

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If your computer browser is set to allow “cookies”, then the BWI site, like most sites on the Internet, installs cookies on your device. By using our website, you are agreeing that we can use cookies in accordance with this policy.

若您的计算机浏览器设置允许“cookies”，则 BWI 网站同大多数其他网站一样，会在您的设备上安装 cookies。您使用我们的网站，即表示您同意我们能够按照本政策使用 cookies。

Cookies consist of pieces of text, often including unique identifiers (strings of letters and numbers) that are sent by web servers to web browsers, and stored by the browser. The identifier may then be sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track users as they navigate different pages on a website and to identify users who are returning. **Note: Most of our cookies are not personal data.**

Cookies 由文本组成，通常包含网络服务器发给浏览器，并被浏览器存储的独特识别符（字母和数字串）。浏览器每次向服务器请求访问页面时，该识别符可发回服务器。这样，网络服务器可在用户浏览某一网站的不同页面时，识别和跟踪用户，从而识别回访用户。**注：我们大多数的 cookies 均非个人数据。**

Cookies may be either “persistent” or “session” cookies. Persistent cookies consist of a text file sent to the web browser from the web server, and are stored by the web browser until its set expiration date or until the user deletes the cookie. A session cookie will expire when the user closes the web browser and is not retained after the browser is closed.

Cookies 可能是“持续性”cookies 也可能是“会话”cookies。持续性 cookies 包含一个从网络服务器发至浏览器的文本文件，并一直存储在浏览器上，直至过期或者用户删除 cookie。会话 cookie 于用户关闭浏览器时失效，并且浏览器关闭后不保留。

There are a number of different ways in which you can accept or reject some or all cookies and similar technologies. Some of the main methods of doing so are described below:

您可以通过各种不同的方式接受或拒绝部分或所有 cookies 以及类似技术。其中一些主要方式如下：

- You are welcome to block the use of some or all of the cookies we use on our website. However, please be aware that doing so may impair our website and its functionality or may even render some or all of it unusable.
- 您可以限制使用我们网站上的部分或所有 cookies。然而请注意，这可能会影响我们的网站及其功能，甚至可导致部分或所有功能无法使用。
- You should also be aware that clearing all cookies from your browser will also delete any cookies that are storing your preferences, for example, whether you have accepted cookies on a website or any cookies that are blocking other cookies.
- 您还应注意，清理您浏览器的所有 cookies 可能会删除存储您偏好的 cookies，例如您是否接受网站上的 cookies，或者屏蔽其他 cookies 的任何 cookies。

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You can find more detailed information about cookies and adjust your browser settings by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org)

您可访问[www.allaboutcookies.org](http://www.allaboutcookies.org)，获得更多有关 cookies 以及浏览器设置调整的详细信息。

The legal basis for cookies for EU users is Art. 6 (1) lit f GDPR thus; we have a legitimate interest in analysing the use of our website to improve our services and advertisement. **Please see BWI cookies policy for more information on why we use cookies, how we use cookies and for what purpose and how to control cookies.**

对于欧盟用户，GDPR 第 6 (1) lit f 条为 cookies 的使用提供了法律依据，因此我们对网站使用情况进行分析以改善服务以及进行广告宣传的做法合法。有关我们为什么使用 cookies，我们如何使用 cookies，用于什么目的，以及如何控制 cookies 的更多信息，请参阅 BWI 的 cookies 政策。

### **Cross border transfers 跨境传输**

Within the scope of our information sharing activities set out above, your personal information may be transferred to other countries which may have different data protection standards than your country of residence. Please note that data processed in a foreign country may be subject to foreign laws and accessible to foreign governments, courts, law enforcement, and regulatory agencies. However, we will take reasonable measures to keep up an adequate level of data protection when sharing your data with such countries.

在上文所述的信息共享活动范围内，可能会向其他国家传输您的个人信息，而这些国家的数据保护标准可能与您居住国家不同。请注意，在外国处理的数据可能需遵守外国法律，可被外国政府、法院、执法部门和监管部门访问。然而，在与该等国家分享您的数据时，我们会采取合理的措施，提供适当的数据保护。

In the case of a transfer from a country within the EU and EEA to a country outside the EU and EEA, this transfer will be protected by signed module clauses. Please see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en) for more information.

若从欧盟和欧洲经济区境内国家向欧盟和欧洲经济区境外国家传输，则会签署模板条款对该传输加以保护。更多信息请参阅 [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)。

### **Security 安全**

Keeping personal data safe and complying with BWI security procedures to protect the confidentiality, integrity, availability and resilience of personal data is a key responsibility for BWI and its workforce.

保障个人数据安全，遵守 BWI 保护个人数据完整性、可用性和恢复性的安全程序，是 BWI 及其工作人员的一大责任。

BWI has an Information Technology Policy, which sets out its organizational and technical security measures to protect information, including personal data.

BWI 制定有信息技术政策，其中载明了为保护信息包括个人数据所采取的组织和技术安全措施。

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The Information Technology Policy also sets out protocols for employees on use of technology and communications systems, which also help to ensure appropriate security of personal data, stored or communicated using such systems.

该信息技术政策还载明了员工对技术和通信系统的使用规定，有助于保证使用该等系统存储或传输之个人数据的安全性。

We regularly evaluate and test the effectiveness of these measures to ensure the security of our personal data processing activities through regular internal audit.

我们通过定期内审，定期评估和测试该等措施的有效性，以保证个人数据处理活动的安全。

### Data retention 数据保存

Records containing personal data should only be kept for as long as they are needed for the identified purposes. BWI has in place data retention, storage and deletion policies and internal processes/guidelines regarding various types of company records and information that contain personal data.

含有个人数据的记录保存期限，仅限于指定用途所需的期限。关于公司各类包含个人数据的记录和信息，BWI 制定有数据保留、存储和删除政策以及内部存储指南。

We take appropriate steps to retain personal data only for so long as is necessary, taking into account the following criteria:

我们参照下列标准，采取适当的措施只在需要的期限内保存个人数据：

- the amount, nature, and sensitivity of the personal data; 个人数据的数量、性质和敏感性；
- the risk of harm from unauthorized use or disclosure; 未经授权使用或披露可造成的损害风险；
- the purposes for which we process the personal data and how long we need the particular data to achieve these purposes; 处理个人数据的目的，以及为实现这些目的的需要数据的期限；
- how long the personal data is likely to remain accurate and up-to-date; 个人数据可能保持准确和最新状态的期限；
- for how long the personal data might be relevant to possible future legal claims; and
- any applicable legal, accounting, reporting or regulatory requirements that specify how long certain records must be kept. 个人数据可能与未来合法要求有关的期限；以及指明记录必须保存期限的任何适用法律、会计、报告或监管要求。

### Minors 未成年人

BWI websites are not directed toward individuals under the age of 13. We do not seek, or knowingly collect information from people under the age of 13. BWI abides by the United States Children's Online Privacy Protection Act (COPPA) and similar other countries children protection laws. In the case we notice a person younger than 13 has provided personal

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information to us, we will use that information only to respond to the person to inform him or her that we must have parental consent prior to receiving their information.

BWI 网站不针对未满 13 岁的个人。我们不寻求或者有意从未满 13 岁的人群收集信息。BWI 遵守《美国儿童网络隐私保护法》（COPPA）及其他国家类似儿童保护法律的规定。若我们发现未满 13 岁的个人向我们提供信息，我们只会使用该信息向该人回复，告知该人我们必须获得其父母的同意才能接收其信息。

## EU individual rights and requests 欧盟个人权利和要求

Under data protection law, individuals have certain rights when it comes to how we handle their personal data. For example, an individual has the following rights:

按照数据保护法，个人对我们如何处理其个人数据享有若干权利。例如，个人具有下列权利：

- **The right to make a ‘subject access request’.** This entitles an individual to receive a copy of the personal data we hold about them, together with information about how and why we process it and other rights which they have (as outlined below). This enables them, for example, to check we are lawfully processing their data and to correct any inaccuracies.
- **提出“主体访问请求”的权利。**个人有权收取我们保存的其个人数据的副本，以及有关我们如何处理、为什么处理及其享有的其他权利（如下文所述）的信息。例如，该权利使得该等个人能够检查我们对其数据的处理是否合法，并有权改正任何不准确之处。
- **The right to request that we correct incomplete or inaccurate personal data that we hold about them.**
- **要求我们改正我们保存的不完整或不准确个人数据的权利。**
- **The right to withdraw any consent** which they have given.
- **撤销其之前作出的任何同意的权利。**
- **The right to request that we delete or remove personal data that we hold about them where there is no good reason for us continuing to process it.** Individuals also have the right to ask us to delete or remove their personal data where they have exercised their right to object to processing (see below).
- **在我们无充分理由继续处理的情况下，要求我们删除我们保存的与其有关的个人数据的权利。**个人还有权行使其反对处理的权利（参见下文），要求我们删除其个人数据。
- **The right to object to our processing** of their personal data for direct marketing purposes, or where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **在我们不能提供令人信服的继续处理理由的情况下，反对我们出于直接营销目的或者我们（或第三方）的其他合法权益处理其个人数据的权利。**
- **The right to request that we restrict our processing** of their personal data. This enables individuals to ask us to suspend the processing of personal data about them, for example if they want us to establish its accuracy or the reason for processing it.
- **要求我们限制其个人数据处理的权利。**根据该权利，若个人希望我们证明其个人数据的准确性或者处理原因，则个人能够要求我们暂停处理与其有关的个人数据。
- **The right to request that we transfer** to them or another party, in a structured format, their personal data which they have provided to us (also known as the right to ‘data portability’). The applicability of this right is where:

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- 对于其之前向我们提供的个人数据，**要求我们以结构化格式向其或其他方传输的权利**（也称之为“数据迁移”权）。该权利适用于下列情形：
  - (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and 根据按照第 6(1) 条 (a) 项或者第 9(2) 条 (a) 项给予的同意，或者按照第 6(1) 条 (b) 项订立的合同处理；
  - (b) the processing is carried out by automated means.  
通过自动化方式进行处理。
- **The right to challenge a decision** based solely on profiling/automated processing, to obtain human intervention, and to express their point of view.
- 对仅基于分析/自动化处理作出的决定**提出异议的权利**，以进行人工干预，表达其意见。

## Contacting us 联系我们

Please submit any questions, comments or concerns regarding this policy or any other requests concerning your personal information to our Data Protection Manager Michael Garland @ Michael.garland@bwigroup.com.

有关本政策的任何疑问、意见或问题，或者与您个人信息有关的任何其他要求，请发送给我们的数据保护经理 Michael Garland，发送地址 Michael.garland@bwigroup.com。

## Policy amendments 政策修订

BWI reserves the right to change this policy, from time to time by updating our website respectively. If so, any changes will apply to personal information collected after the policy effective date. We encourage our users to visit the website periodically and review our current privacy policy.

BWI 有权通过更新我们的网站，不时对本政策进行修改。若进行任何修改，则修改规定将适用于在政策生效日期后收集的个人信息。我们鼓励网站访问用户定期查看我们的现行隐私政策。