

APAC - China

EMPLOYEE AND CONTRACTOR DATA PROTECTION NOTICE

Effective: 1st October, 2022

[Chinese Version](#)

[English version](#)

INTRODUCTION

The legal entity named on the contract of employment of the Employee, or the engagement of the Contractor (the “**Company**”) has prepared this Employee and Contractor Data Protection Notice (“**Notice**”) to outline its practices regarding the collection, use, storage, transfer and other processing of individually identifiable information about Employees or Contractors (“**Personal Data**”). For the purposes of this Notice, “**Employee**” means any individual who is, or has been employed by the Company. For the purposes of this Notice, “**Contractor**” means any individual who is engaged to provide services to the Company and who is not an employee of the Company or a non-executive director of the Company. If you are a Contractor, the terms of this Notice do not create an employment relationship between you and the Company. The Company may also provide to Employees and Contractors additional data protection or privacy notices from time to time.

In the event this Notice is provided to an Employee or Contractor in a language other than Chinese, any discrepancy, conflict or inconsistency between the two language versions shall be resolved in favour of the Chinese version, subject to applicable law.

[Chinese version](#)

[English version](#)

PERSONAL DATA COLLECTION AND PURPOSES OF USE

Good employment and engagement practices and the effective running of our business require the Company to collect, use, store, transfer and otherwise process certain Personal Data.

The Company collects Personal Data that is directly relevant to its business, required to meet its legal obligations, or otherwise permissible to collect under applicable law. Listed in [Appendix A](#) for Employees and [Appendix B](#) for Contractors of this Notice are the categories of Personal Data that we collect and the purposes for which we use the data that we collect, except where restricted by applicable law. We receive Personal Data from you and from other sources, such as colleagues, managers, referrals and background check providers, and public sources.

We collect and process Personal Data about you: (i) because we are required or permitted to do so by applicable law, (ii) because such information is necessary to fulfil your contract of employment or engagement with the Company and facilitate your relationship with the Company, or (for Employees) such information is necessary to conduct human resources management under the labor rules formulated and the collective contracts entered into in accordance with laws, (iii) where the processing is necessary for the response to public health

emergencies, or for the protection of your life, health and property safety in emergencies, (iv) where the Personal Data is disclosed by yourself or is otherwise legally disclosed and is processed within a reasonable scope and in accordance with laws, or (v) where necessary, we obtain consent of Employees or Contractors for collection and processing of Personal Data.

If you do not provide certain categories of Personal Data, the Company may not be able to accomplish some of the purposes outlined in this Notice and the issue may need to be escalated to Human Resources to deal with as appropriate.

SENSITIVE PERSONAL DATA

The Company may collect and process certain special categories of Personal Data (“**Sensitive Personal Data**”) about Employees or Contractors where required by applicable law, where necessary for the establishment, exercise or defence of legal claims, or, where necessary, the Employee or Contractor has provided explicit (and, where applicable, written or separate) consent. Subject to applicable law, the Company may process information about:

physical and/or mental health for the purposes of benefits administration and addressing workplace health, safety and accommodation issues

criminal charges/convictions or unlawful behaviour for recruitment and employment screening purposes and for registration and licensing requirements

work-related illnesses or injuries for the purpose of complying with legal obligations (or assessing entitlements)

sexual orientation, physical and/or mental health, religious beliefs for purposes of reporting on diversity and inclusion statistics, complying with government reporting requirements, and/or other legal obligations

biometric data, such as fingerprints and iris scans, for the purposes of electronic identification, authentication and corporate security, at secured Company premises

We process Sensitive Personal Data in your jurisdiction if and to the extent permitted or required by applicable law. We will seek to protect such information using strict security measures further described below such that your sensitive personal information should only be processed in accordance with the applicable laws.

For further information on the purposes of using the above data, please also reference [Appendix A](#) for Employees and [Appendix B](#) for Contractors.

PERSONAL DATA ABOUT DEPENDENTS

If an Employee or Contractor provides the Company with Personal Data about members of his/her family and/or other dependents (e.g., for emergency contact and benefits administration purposes), it is that Employee’s or Contractor’s responsibility to inform such individuals of their rights, (see Section titled “ACCESS, PORTABILITY, RECTIFICATION AND SUPPRESSION, LIMITATION AND RESTRICTION OF PROCESSING AND ACCURACY OF PERSONAL DATA”) and to obtain their explicit (and, where applicable, written or separate) consent, where necessary, to the processing (including transfer) of their Personal Data as set out in this Notice.

COOKIES

Non-essential and essential cookies are collected on some websites and mobile applications that the Company uses. Please refer to the following [policy](#).

ACCESS BY COMPANY PERSONNEL

Where permitted by applicable law, access to Personal Data is restricted to those individuals who need such access for the purposes listed in this notice and [Appendix A](#) for Employees and [Appendix B](#) for Contractors, including but not limited to members of the Human Resources Department and the managers in the Employee's or Contractor's line of business, and to authorised representatives of the Company's internal control functions such as Compliance, Chief Administrative Office, Information Security, Corporate Security, Audit and Legal. Access may also be granted on a strict need-to-know basis to others where permitted by applicable law.

DISCLOSURE

To the extent permitted by applicable law and as appropriate to achieve the purposes described in this Notice, Personal Data may be disclosed by the Company as follows:

Given the global nature of the Company's activities, the Company may (subject to applicable law) transmit Personal Data, including Sensitive Personal Data, to other Bank of America affiliates or operations located in other jurisdictions, including the United States or other jurisdictions where data protection laws may not provide an equivalent level of protection to the laws in the Employee's or Contractor's home jurisdiction. The affiliates belonging to the Bank of America Corporation group are listed at the link below. The listing is available upon request for new Employees and Contractors who do not yet have access to the internal site.

[Bank of America Corporation Group](#)

Bank of America Corporation Group, the Company may disclose in accordance with applicable law relevant Personal Data to certain third parties in connection with the provision of services to the Company. Where the processing of Personal Data is delegated to a third party data processor, such as those listed in [Appendix A](#) for Employees and [Appendix B](#) for Contractors, the Company will delegate such processing in writing, will choose a data processor that provides sufficient guarantees with respect to technical and organizational security measures, such as data protection and information security requirements, governing the relevant processing and will ensure that the processor acts on the Company's behalf and under the Company's instructions. Personal Data also may be disclosed, where permitted by applicable law, in connection with a corporate restructuring, sale, or assignment of assets, merger, divestiture, or other changes of the financial status of the Company or any of its subsidiary or affiliated companies. Subject to applicable law, personal Data also may be released to protect the vital interests of Employees and Contractors, to protect the legitimate interests of the Company (unless this would prejudice the rights and freedoms or interests of the Employee or Contractor), or in the Company's judgment to comply with applicable legal or regulatory obligations and regulatory inquiries or requests.

SECURITY

The Company maintains appropriate technical and organizational measures designed to protect against unauthorised or unlawful processing of Personal Data and/or against accidental loss,

alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Data.

ACCESS, PORTABILITY, RECTIFICATION AND SUPPRESSION, LIMITATION AND RESTRICTION OF PROCESSING AND ACCURACY OF PERSONAL DATA

Employees and Contractors are entitled to access Personal Data held about them (with the exception of any documents that are subject to legal privilege, that provide Personal Data about other Employees or Contractors, or that otherwise are not subject to data subject access rights). Any Employee or Contractor who wishes to access his/her Personal Data or (where permitted under applicable law) request portability of their data should contact a member of the Human Resources Department using the contact information set out in Section titled "QUESTIONS" below.

To the extent required by applicable law, Employees and Contractors have the right to have inaccurate data corrected or removed (at no charge to the Employee or Contractor and at any time) or to limit or restrict processing of their data.

To assist the Company in maintaining accurate Personal Data, Employees and Contractors must ensure they keep their Personal Data up to date on the Company's Global HR system. In the event that the Company becomes aware of any inaccuracy in the Personal Data it has recorded, it will correct that inaccuracy at the earliest practical opportunity.

To the extent available under applicable law, Employees and Contractors may also have the following rights (including but not limited to):

- to request a copy of Personal Data held by the Company (as part of an access request above);
- to request further information or complain about the Company's practices and processes regarding their Personal Data;
- to object to, withdraw consent to, restrict, or request discontinuance of collection, use, disclosure and other processing of their Personal Data as described in this Notice and to request deletion of such Personal Data by the Company.

For all inquiries, Employees and Contractors should contact a member of the Human Resources Department using the contact information set out in Section titled "QUESTIONS" below. Under applicable law, in certain circumstances, the Company may be exempt from or entitled to refuse the above requests or rights. Certain additional terms and conditions may be applicable to process requests or rights, such as requiring communications to be in writing or requiring proof of identity.

MODALITIES OF THE PROCESSING AND DATA RETENTION

The Company does not use automated decision making on Employee or Contractor processes. 'Automated decision-making' is the process of making a decision by automated means without any human involvement.

Collection, use, disclosure, transfer and other processing, including storage, of Personal Data may be by electronic or manual means, including by hard-copy or soft-copy documents or other appropriate technology. Personal Data may be stored in an Employee's or Contractor's home jurisdiction and/or other jurisdictions in which the Company has operations.

The Company will maintain Personal Data for as long as it is required to do so by applicable law(s) or for as long as necessary for the purpose(s) of use and processing in Section titled "PERSONAL DATA COLLECTION AND PURPOSES OF USE", whichever is longer. Any minimum/maximum storage term set forth by applicable law will prevail. The Company will delete Personal Data after the applicable retention period.

The criteria used to determine our retention periods include:

As long as we have an ongoing relationship with the Employee or Contractor;

As required by a legal obligation to which we are subject;

As advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations).

QUESTIONS

Should any Employee or Contractor have any questions, concerns or complaints about this Notice, please contact the Human Resources Service Centre via hrsc.apac@bofa.com or by phone at **00800.2722.4772** or **+65.6591.1166**.

In certain countries/territories, if you have additional queries about the way in which the Company processes your Personal Data more broadly you may contact the local Data Protection Officer using the following contact details:

APAC Jurisdictions	connect.dpo@bofa.com
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Employees and Contractors may have the right to lodge a complaint with the local Data Protection authority.

CHANGES TO THIS NOTICE

Should the Company substantially modify the manner in which it collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, it will notify Employees and Contractors as soon as reasonably possible by reissuing a revised Notice or taking other steps in accordance with applicable laws including obtaining the requisite level of Employee and Contractor consent required by law.

JURISDICTION-SPECIFIC CLAUSES

PEOPLE'S REPUBLIC OF CHINA

("China", which, for the purpose of this Notice, excludes the Hong Kong Special Administrative Region, the Macau Special Administrative Region and Taiwan)

Please see [Appendix C](#) for a list of the organizations to whom we transfer Personal Data as data controllers in China (which can independently determine processing purposes and processing methods in Personal Data processing activities) and other receiving parties outside of China, and their respective contact details and details on what, how and why such organizations process your Personal Data and, where required, how you can exercise your data privacy rights in respect of those organizations.

Where required or permitted by applicable law, we may process Sensitive Personal Data for employment purposes in a manner that reasonably considers and mitigates, where practicable, negative impacts to your rights and interests.

In accordance with the China Banking and Insurance Regulatory Commission (CBIRC) Shanghai regulations, banks and insurance companies operating in Shanghai are required to disclose to CBIRC Shanghai certain employee hiring and termination information, including employment status, job movements and disciplinary records, during your employment with the Company. Such information is recorded in the CBIRC Shanghai's system and is accessible by other banks and insurance companies for reference check purposes.

Consent of the Notice

I have read the "Employee and Contractor Data Protection Notice" dated 1st February 2022. I expressly and voluntarily consent to the application of its terms regarding the collection, processing, use, and international transfer of my Personal Data by the Company (including Sensitive Personal Data and including international transfer of my Personal Data to jurisdictions where data protection laws may not provide an equivalent level of protection to the laws of my home jurisdiction) during and in connection with the course of my employment or engagement.

I confirm that, prior to providing any Personal Data of other individuals to the Company (if applicable), I have duly provided them with all information regarding the processing of their Personal Data and their related rights, as described in the Notice and that I have obtained the explicit (and, where applicable, written or separate) consent of those individuals, where necessary, to the processing of their Personal Data.

Please refer to instructions for how to consent to the Notice.

Please check (where applicable), sign, scan and submit a signed copy to your local HR Team:

China:

- The Company will process Personal Data as set out in this Notice and as further specified in the Cookie Policy hyperlinked to that Section. I consent to such use.
- The Company will process and retain Sensitive Personal Data (*e.g.* biometric information, credit card information, location data where relevant), as set out in Section titled "PERSONAL DATA COLLECTION AND PURPOSES OF USE" of this Notice. I consent to such use.
- The Company will transfer Personal Data to third parties within China, as detailed in Sections titled "DISCLOSURE" and "JURISDICTION-SPECIFIC CLAUSES" of this Notice. I consent to such transfers.
- The Company will transfer Personal Data to third parties outside China, as detailed in Sections titled "DISCLOSURE" and "JURISDICTION-SPECIFIC CLAUSES" of this Notice. I consent to such transfers.

Employee Name

Signature

Date

Appendix A - Employee

Refer to the matrix linked [here](#) to view the categories of data that may be collected for each purpose of use, summarized below. The matrix is available upon request for new Employees who do not yet have access to the internal site.

The Categories of Personal Data We May Collect, Use, Transfer and Disclose, unless restricted by applicable law

- **Recruitment/Applicant information:** Pre-employment references; employment history; language(s) spoken; previous compensation; video recording.
- **Employment and Job Information:** Job title and/or position and description of responsibilities/duties; job family; location; band/seniority; Employee identifiers; department; line and sub-line of business; local Company entity name; cost centre information; employment dates; supervisor/manager/team lead name and contact information; work contact information; termination details.
- **Personal Demographic Information:** Date and place of birth; Dependent date of birth; Nationality; gender; name (including birth surname and any other former names); Dependent full name; family/marital status; copy/ies of birth certificate; details of military service.
- **Visa/ Citizenship Details:** Work eligibility status; **entitlement to residency**; citizenship; passport details; visa details; National ID.
- **Contact Details:** Address, telephone, email and emergency contact details.
- **Payroll:** Social insurance number or other tax identifier number; MyNumber; bank account details; full address; tax and social security contributions; payroll payments and deductions and other financial information; shift and overtime data; Tax forms e.g. P60 (UK).
- **Employee Administration:** Reference letters; query management records; Flexible Working Requests; voice recording; video recording (e.g. townhalls).
- **Global Mobility:** Business travel information (including business visa details and travel logs and itineraries).
- **Absence Data:** Absence details e.g. sickness, holiday and maternity leaves.
- **Attendance Data:** Working Time Directive Details.
- **Physical Security and Life Safety Data:** Swipe card entry data; CCTV; photograph (Security ID Card); Accident and Incident Reporting; Biometrics; data required for purposes related to Health and Safety in the workplace.
- **Compensation:** Compensation information (including base salary, market rates, incentive payment(s), stock options information and allowances).
- **Pension:** Information related to retirement planning.

- **Employee Benefits:** Benefits records and related information e.g. Health cover, Life Assurance
- **Education and Training:** Academic Record, Professional Qualifications and Memberships; professional training; Company internal training; video recording.
- **Regulatory Data (where applicable):** Licenses and certifications; financial regulatory registration; voice recording.
- **Succession Planning Details:** Reporting structure; talent management and succession planning data (including mobility preferences, date assigned to a talent pool, talent pool name and description, areas of expertise, general management experience, leadership behaviour, strengths and development needs).
- **Performance/ Development Plans/ 360 Reviews:** Performance related information (including assessments and ratings (results rating, behaviour rating, potential rating), performance goals description, key competencies description).
- **ER Case / Compliance / Legal Management:** Areas for development, coaching notes, feedback from others, self-assessment description, manager review description, performance expectations, measurement criteria, action dates, manager progress notes; career development information; employment disciplinary record, activities and investigations; information pertaining to any grievances raised.
- **Technical information:** Including username and passwords, voice data, IP address, domain, browser type, operating system, click-stream data and system logs) and electronic and non-electronic content and documents created or produced by you using Company systems or in the performance of your role with the Company.
- **Securities and Stock Trading:** Details of outside business activities and directorship(s) (where relevant for employment-related purposes); securities and stock trading activity/experience (where relevant for employment-related purposes).
- **Sensitive Personal Data:** e.g. race or ethnic origin, physical and/or mental health, criminal charges/convictions, sexual orientation, religious or philosophical beliefs, biometric information, trade union membership.
- **Diversity and Inclusion Data** (e.g. veteran status, race, ethnicity, age, disability status, sexual orientation, gender, gender identity, and gender expression).
- **Signatures,** including digital images and physical copies
- **Virtual or In-Person Events Data:** Information needed for participation in virtual or in-person events: speaker biographies, travel details, spouse/partner name, name and age of child/children collected through parents or guardians attending events, dietary requirements of individuals attending an event, special assistance needs of individuals attending an event.

The Purposes For Which We May Collect, Use, Transfer And Disclose Personal Data:

- **Administering and managing the Employee employment relationship, general administration and budgeting; preparation, management, and use of internal communication.**
- **Recruiting activities, talent management and succession planning.**
- **Authentication/identification of Employees,** including voice authentication (e.g. for help desk).
- Human resources information systems (“HRIS”) and application support and development.
- **Information technology and information security support** (including firewall monitoring, anti-spam and virus protection, and other monitoring, for example in accordance with the Company’s regional Cyber Security Monitoring Notices).

- **Management of internal business operations** (including monitoring compliance with Company policies and procedures, for example in accordance with the Company's regional Cyber Security Monitoring Notices).
- **Complying with applicable government reporting and other local and foreign law requirements** (including the requirements of the US Sarbanes-Oxley Act or other applicable internal control regulations and in such areas as immigration, tax or statutory financial regulation) and other legal obligations, subject to applicable law.
- **Payroll and compensation management, administration and processing** (including compensation metrics and decisions, bonus calculations and stock plan administration).
- **Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations and payroll reporting**, not limited to but including business travel.
- **Benefits and insurance administration and management** (including decisions regarding eligibility for staff loans).
- Fostering career planning and growth.
- **Training, advice and counselling purposes.**
- **Employee performance and productivity reviews/assessments and general performance management.**
- **Defending, preparing for, participating in and responding to potential legal claims, investigations and regulatory inquiries** (all as allowed by applicable law).
- **Disciplinary actions/investigations** (as permitted by applicable law).
- **Client and customer service and marketing activities** (including but not limited to inclusion in internal and external internet and intranet sites, marketing materials, event management materials, deal documents, pitch books and as required to provide services and products to our clients).
- **Managing relationships with clients and other third parties** (including, subject to applicable law, licensing and registration bodies, legal counsel, stock exchanges, or business counterparties).
- **Post-employment purposes** (for example, providing employment references, assessing rehire eligibility, and any of the purposes listed above that may be applicable during the post-employment period).
- **To assist with Information Technology operational support** (including system maintenance and bug fixes).
- To promote the safe and healthy working conditions of company facilities.
- **Diversity and Inclusion Data** is used on an aggregated basis for reporting and promotions. Diversity and Inclusion Data excluding disability status is used on a personally identifiable basis, for talent management, succession planning, and training and conference opportunities.
- **Corporate Alumni program** for previous employee engagement.
- **Virtual or In-Person Events** (including information needed for participation in virtual or in-person events). This may include information on your spouse or children where appropriate. [In the context of virtual or in person events, Personal Data or other information may be collected when an individual visits us online to register for an event, attends an event, asks for event information, downloads content, or shares an interest to attend an event through our client relationship partner.
- Administering volunteer and giving programs

The Categories Of Unaffiliated Third Parties With Whom We May Share Personal Information

- **Professional Advisors:** Accountants, auditors, lawyers, insurers, bankers, tax advisors and other outside professional advisors in all of the countries/territories in which the Company operates.
- **Service Providers:** Companies that provide products and services to the Company in the countries/territories in which the Company operates, such as payroll, partner banks, pension scheme, benefits providers; human resources services, recruitment and training providers; performance management, training, expense management, IT systems suppliers and support; reception and security, catering and logistics services providers, translation services, third parties assisting with event organizing and marketing activities, medical or health practitioners, trade bodies and associations, and other service providers.
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over the Company in the countries/territories in which the Company operates, such as regulatory authorities, law enforcement, public bodies, licensing and registration bodies, judicial bodies and third parties appointed by such authorities.
- **Trade Unions:** Trade unions to which the Employees are affiliated.
- **Parties Related to a Corporate Transaction:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings), e.g., stock exchanges and business counterparties.
- Where appropriate, the Company will offer and receive reasonable assistance from third parties (such as service providers) in order to respond to data subject access requests.
- Current or prospective customers and clients.
- **Event Vendors:** Event vendors, organizers, speakers, volunteers, contractors, and sponsors to facilitate events

Appendix B – Contractors

Refer to the matrix linked [here](#) to view the categories of data that may be collected for each purpose of use, summarized below. The matrix is available upon request for new Contractors who do not yet have access to the internal site.

The Categories of Personal Data We May Collect, Use, Transfer and Disclose, unless restricted by applicable law:

- **Recruitment/Applicant information:** Pre-Engagement references; employment history; language(s) spoken; previous compensation; video recording.
- **Position Information:** Job title and/or position and description of responsibilities/duties; job family; location; band/seniority; Contractor Identifiers; department; line and sub-line of business; local Company entity name; cost centre information; engagement dates; supervisor/manager/team lead name and contact information; work contact information; termination details.
- **Personal Demographic Information:** Date and place of birth; Dependent date of birth; Nationality; gender; name (including birth surname and any other former names); Dependent full name; family/marital status.
- **Visa/ Citizenship Details:** Work eligibility status; entitlement to residency; citizenship; passport details; visa details; National ID.
- **Contact Details:** Address, telephone, email and emergency contact details.
- **Contractor Administration:** Reference letters; query management records; working arrangement requests; voice recording; video recording (e.g. townhalls).
- **Global Mobility:** Business travel information (including business visa details and travel logs and itineraries).
- **Absence Data: Absence details e.g. sickness,** holiday and maternity leaves.
- **Attendance Data:** Working Time Directive details.
- **Physical Security and Life Safety Data:** Swipe card entry data; CCTV; photograph (Security ID Card); Accident and Incident reporting; biometrics; data required for purposes related to Health and Safety in the workplace.
- **Compensation:** Compensation information (including pay rates).
- Contractor Benefits.
- **Education and Training:** Academic record, professional qualifications and memberships; Company internal training; video recording.
- **Regulatory Data (where applicable):** e.g. voice recording; video recording (e.g. townhalls).
- **ER Case / Compliance / Legal Management:** Information pertaining to any grievances/investigations raised, action dates.
- **Technical information:** Including username and passwords, voice data, IP address, domain, browser type, operating system, click-stream data and system logs) and electronic and non-electronic content and documents created or produced by you using Company systems or in the performance of your role with the Company.
- **Securities and Stock Trading:** Details of outside business activities and directorship(s) (where relevant for engagement-related purposes); securities and stock trading activity/experience (where relevant).
- **Sensitive Personal Data:** e.g. race or ethnic origin, physical and/or mental health, criminal charges/convictions, sexual orientation, religious or philosophical beliefs, biometric information, trade union membership.

- **Signatures**, including digital images and physical copies
- **Virtual or In-Person Events Data:** Information needed for participation in virtual or in-person events including speaker biographies, travel details, spouse/partner name, name and age of child/children collected through parents or guardians attending events, dietary requirements of individuals attending an event, special assistance needs of individuals attending an event. **Contractors must not participate in events unless the event is directly related to the work assignment.**

The Purposes For Which We May Collect, Use, Transfer And Disclose Personal Data For Contractors:

- **Administering, contracting and managing the engagement relationship, general administration and budgeting; preparation, management, and use of internal communication.**
- **Recruiting activities and resource planning.**
- **Authentication/identification of Contractors**, including voice authentication (e.g. for help desk).
- Human resources information systems (“HRIS”) and application support and development
- **Information technology and information security support** (including firewall monitoring, anti-spam and virus protection, and other monitoring, for example in accordance with the Company’s regional Cyber Security Monitoring Notices).
- **Management of internal business operations** (including monitoring compliance with Company policies and procedures, for example in accordance with the Company’s regional Cyber Security Monitoring Notices).
- **Complying with applicable government reporting and other local and foreign law requirements** (including the requirements of the US Sarbanes-Oxley Act or other applicable internal control regulations and in such areas as immigration, tax or statutory financial regulation) and other legal obligations, subject to applicable law.
- **Compensation management and administration** (including with regards to pay rates).
- **Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations**, not limited to but including business travel.
- Benefits administration and management.
- **Training, advice and counselling purposes.**
- **Contractor assessments.**
- **Defending, preparing for, participating in and responding to potential legal claims, investigations and regulatory inquiries** (all as allowed by applicable law).
- **Investigations** (as permitted by applicable law).
- **Client and customer service and marketing activities** (including but not limited to inclusion in internal and external internet and intranet sites, marketing materials, event management materials, deal documents, pitch books and as required to provide services and products to our clients).
- **Managing relationships with clients and other third parties** (including, subject to applicable law, licensing and registration bodies, legal counsel, stock exchanges, or business counterparties).

- **Post-engagement purposes** (for example, providing contractor references, assessing rehire eligibility and any of the purposes listed above that may be applicable during the post-engagement period).
- **To assist with Information Technology operational support** (including system maintenance and bug fixes).
- To promote the safe and healthy working conditions of Company facilities.
- **Diversity and Inclusion Reporting.**
- **Virtual or In-Person Events** (including information needed for participation in virtual or in-person events). This may include information on your spouse or children where appropriate. [In the context of virtual or in-person events, Personal Data or other information may be collected when an individual visits us online to register for an event, attends an event, asks for event information, downloads content, or shares an interest to attend an event through our client relationship partner. **Contractors must not participate in events unless the event is directly related to the work assignment.**

The Categories of Unaffiliated Third Parties With Whom We May Share Personal Information

- **Professional Advisors:** Accountants, auditors, lawyers, insurers, bankers, tax advisors and other outside professional advisors in all of the countries/territories in which the Company operates.
- **Service Providers:** Companies that provide products and services to the Company in the countries/territories in which the Company operates, such as benefits providers; human resources services, recruitment and training providers; training, expense management, IT systems suppliers and support; reception and security, catering and logistics services providers, translation services, third parties assisting with event organizing and marketing activities, trade bodies and associations, and other service providers including, where applicable, your employer or company.
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over the Company in the countries/territories in which the Company operates, such as regulatory authorities, law enforcement, public bodies, licensing and registration bodies, judicial bodies and third parties appointed by such authorities.
- **Trade Unions:** Trade unions to which the Contractors are affiliated.
- **Parties Related to a Corporate Transaction:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings), e.g., stock exchanges and business counterparties.
- Current or prospective customers and clients.
- **Event Vendors:** Event vendors, organizers, speakers, volunteers, contractors, and sponsors to facilitate events. **Contractors must not participate in events unless the event is directly related to the work assignment.**

Appendix C

Organizations To Which We May Disclose Personal Data

Details on Rights are included in Section titled “ACCESS, PORTABILITY, RECTIFICATION AND SUPPRESSION, LIMITATION AND RESTRICTION OF PROCESSING AND ACCURACY OF PERSONAL DATA” of the Notice

R&D Parent BE Name	Contact Information	Processing Purpose and Method	Category of Personal Information
AIA GROUP LIMITED	AIASH Compliance - cn.aiashcompliance@aia.com; Tel: 86-21-53599988	Benefits and insurance administration and management (including decisions regarding eligibility for staff loans).	Employee Benefits: Benefits records and related information e.g. Health cover, Life Assurance
ALIGHT SOLUTIONS LLC	privacy.info@alight.com	Human resources information systems (“HRIS”) and application support and development.	Employment and Job Information: Job title and/or position and description of responsibilities/duties; job family; location; band/seniority; Employee identifiers; department; line and sub-line of business; local Company entity name; cost centre information; employment dates; supervisor/manager/team lead name and contact information; work contact information; termination details.
AMS BIDCO LTD	PCMailboxAsiaPac@weareams.com	Recruiting activities, talent management and succession planning; Fostering career planning and growth; Corporate Alumni program for previous employee engagement	Recruitment/Applicant information: Pre-employment references; employment history; language(s) spoken; previous compensation; video recording.
AUTOMATIC DATA PROCESSING, INC.	privacy@adp.com	Payroll and compensation management, administration and processing (including compensation metrics and decisions, bonus calculations and stock plan administration); Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations and payroll reporting, not limited to but including business travel.	Payroll: Social insurance number or other tax identifier number; MyNumber; bank account details; full address; tax and social security contributions; payroll payments and deductions and other financial information; shift and overtime data; Tax forms

CHINA INTERNATIONAL INTELLECTECH GROUP CO.,LTD.	Mr. Yong, Guangming gastuyong@ciicsh.com +8621 3397 2334	Payroll and compensation management, administration and processing (including compensation metrics and decisions, bonus calculations and stock plan administration); Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations and payroll reporting, not limited to but including business travel.	Payroll: Social insurance number or other tax identifier number; MyNumber; bank account details; full address; tax and social security contributions; payroll payments and deductions and other financial information; shift and overtime data; Tax forms
Cybergrants, Inc.	privacy@cybergrants.com	Employee Volunteer and Matching Gift program administration.	Employee information includes name, bank contact information (including email and phone number), home address and Country code, Bank of America hire date and Band level
ECHOSPAN, INC.	privacy@echospan.com	Employee performance and productivity reviews/assessments and general performance management.	Performance/ Development Plans/ 360 Reviews: Performance related information (including assessments and ratings (results rating, behaviour rating, potential rating), performance goals description, key competencies description.

EQUUS SOFTWARE, LLC	michael.haskins@equusoft.com	Administering and managing the Employee employment relationship, general administration and budgeting; preparation, management, and use of internal communication; Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations and payroll reporting, not limited to but including business travel.	Global Mobility: Business travel information (including business visa details and travel logs and itineraries); Visa/ Citizenship Details: Work eligibility status; entitlement to residency; citizenship; passport details; visa details; National ID; Personal Demographic Information: Date and place of birth; Dependent date of birth; Nationality; gender; name (including birth surname and any other former names); Dependent full name; family/marital status; copy/ies of birth certificate;
FRAGOMEN, DEL REY, BERNSEN & LOEWY, LLP	dataprivacy@fragomen.com	Administering and managing the Employee employment relationship, general administration and budgeting; preparation, management, and use of internal communication; Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations and payroll reporting, not limited to but including business travel.	Global Mobility: Business travel information (including business visa details and travel logs and itineraries); Visa/ Citizenship Details: Work eligibility status; entitlement to residency; citizenship; passport details; visa details; National ID; Personal Demographic Information: Date and place of birth; Dependent date of birth; Nationality; gender; name (including birth surname and any other former names); Dependent full name; family/marital status; copy/ies of birth certificate;

MERCER MARSH	privacyofficer.china@mercer.com	Benefits and insurance administration and management (including decisions regarding eligibility for staff loans).	Employee Benefits: Benefits records and related information e.g. Health cover, Life Assurance
O. C. TANNER COMPANY	privacy@octanner.com .	Administering and managing the Employee employment relationship, general administration and budgeting; preparation, management, and use of internal communication.	Contact Details: Address, telephone, email and emergency contact details.
OLEEO PLC	dataprotectionofficer@oleeo.com	Recruiting activities, talent management and succession planning; Fostering career planning and growth; Corporate Alumni program for previous employee engagement	Recruitment/Applicant information: Pre-employment references; employment history; language(s) spoken; previous compensation; video recording.
SIRVA, INC.	secadmin2@sirva.com	Administering and managing the Employee employment relationship, general administration and budgeting; preparation, management, and use of internal communication; Complying with local or foreign state and/or country/territory specific tax and immigration laws and regulations and payroll reporting, not limited to but including business travel.	Global Mobility: Business travel information (including business visa details and travel logs and itineraries); Visa/ Citizenship Details: Work eligibility status; entitlement to residency; citizenship; passport details; visa details; National ID; Personal Demographic Information: Date and place of birth; Dependent date of birth; Nationality; gender; name (including birth surname and any other former names); Dependent full name; family/marital status; copy/ies of birth certificate;
SPENCER STUART STAR US INC.	Privacy@kincentric.com	Training, advice and counselling purposes.	Education and Training: Academic record; professional training; Company internal training; video recording.
THE MYERS-BRIGGS COMPANY	Bchapman@themyersbriggs.com	Training, advice and counselling purposes.	Education and Training: Academic record; professional training; Company internal training; video recording.
WILLIS TOWERS WATSON PUBLIC LIMITED COMPANY	privacy@willistowerswatson.com	Payroll and compensation management, administration and processing (including compensation metrics and decisions, bonus calculations and stock plan administration).	Compensation: Compensation information (including base salary, market rates, incentive payment(s), stock options information and allowances).

员工与承包商数据保护通知 生效日期：2022 年 10 月 1 日

[中文版](#) [English version](#)

引言

员工雇佣合同或者承包商聘用合同上指明的法律实体（本“公司”）已制作本员工和承包商资料保护通知（“通知”），列明其关于收集、使用、存储、传输和以其他方式处理关于员工或承包商的个人可识别信息（“个人资料”）的实践。就本通知而言，“员工”指受本公司雇佣或已被本公司雇佣的任何人。就本通知而言，“承包商”指受聘为本公司提供服务而非本公司雇员或非本公司执行董事的任何个人。如果您是承包商，本通知的条款和条件不会在您与本公司之间建立雇佣关系。本公司也可不时向员工和承包商提供其他资料保护或隐私通知。

若本通知以中文以外的其他语言提供给员工或承包商，那么两种语言版本之间的任何差异、冲突或不一致应以支持中文版本的方式予以解决（除非适用法律另有规定）。

[中文版](#)
[English version](#)

个人数据收集和使用目的

良好的雇佣惯例以及业务的有效运转需要本公司收集、使用、存储、传输以及以其他方式处理特定的个人资料。

本公司收集同其业务直接相关的、履行其法律义务所需或适用法律另作规定允许收集的个人资料。本通知中适用于员工的[附录 A](#) 以及适用于承包商的[附录 B](#) 中列明了我们收集的个人资料的类别以及我们使用所收集的资料的目的（适用法律限制的除外）。我们收到来自您和其他来源的个人资料，例如同事、经理、推荐人、背景调查提供者和公共来源。

我们收集并处理有关您的个人数据：(i) 因为适用法律要求或者允许我们进行收集和处理，(ii) 因为此等信息对于履行您与公司的雇佣或聘用合同并促进您与公司的关系是必要的，或者（对于员工而言）此等信息对于根据依法制定的劳动规则和依法签订的集体合同开展人力资源管理是必要的，(iii) 为响应公共卫生紧急事件，或为在紧急状态下保护您的生命、健康和财产安全而必需进行处理，(iv) 个人数据由您本人披露，或以其它方式合法披露并在合理范围内依法进行处理，或 (v) 必要时，我们会取得员工或承包商对于收集和处理个人数据的同意。

如果您不提供某些类别的个人资料，本公司可能无法实现本通知中列明的某些目的，且该问题可能需要上报至人力资源部适当处理。

敏感的个人数据

在下列情况下，本公司可收集和处理有关员工或承包商的某些特殊类别的个人资料（“敏感的个人资料”）：**适用法律要求；确立、行使或辩护合法主张需要；**或者在必要时，员工或承包商已提供明确同意（且在适用时提供书面形式或单独的同意）。根据适用法律，**本公司可能会处理**有关以下方面的信息：

有关身体和/或心理健康的信息，用于管理福利，以及解决工作场所健康、安全和住宿问题

有关刑事指控/定罪或非法行为的信息，用于进行招聘和雇佣筛查，以及满足注册和许可要求

有关工作相关疾病或受伤的信息，以便履行法律义务（或评估应有权利）

有关性取向、身体和/或心理健康、宗教信仰的信息，用于报告多样性和包容性统计数据、遵守政府报告要求和/或履行其他法律义务

生物识别数据，如在安全的本公司场所进行指纹和虹膜扫描，并用于电子身份识别、验证和公司安全

如果适用法律允许或要求，我们将在您所属的司法辖区处理敏感个人数据。我们将采用下文详述的严格安全措施保护此等信息，确保仅依据适用法律处理您的敏感个人信息。

关于使用上述资料之目的的更多信息，另请参考适用于员工的[附录 A](#) 以及适用于承包商的[附录 B](#)。

有关家属的个人资料

如果员工或承包商向本公司提供有关其家人和/或其他家属的个人资料（例如出于紧急联系和福利管理的目的），该员工或承包商有责任通知此类个人其享有的权利（见“个人数据的访问、可携带性、纠正和抑制、限制和禁止处理以及准确性”章节），并根据需要取得其明确同意（且在适用时提供书面形式或单独的同意），以便处理（包括传输）本通知所载的个人资料。

Cookie

会在本公司使用的某些网站和移动应用程序上收集非必要 cookie 和必要 cookie。请参考以下[政策](#)。

本公司员工访问

在适用法律允许的情况下，个人资料访问仅限于为实现[附录 A](#)（适用于员工）和[附录 B](#)

（适用于附录 B）中所列目的而需要此类访问的个人，包括但不限于人力资源部人员和员工或承包商的业务经理，以及本公司内部控制职能部门（如合规、总行政办事处、信息安全部、公司安全部、审计部和法律部）的授权代表。在适用法律允许的情况下，访问权也可基于严格的需知规定授予他人。

披露

在适用法律允许的范围内以及适当的情况下，为根据具体情况实现本通知中所述的目的，本公司可能在下列情况下披露个人资料：

鉴于本公司活动的全球性，本公司可（根据适用法律）将个人资料（包括敏感的个人资料）传输至其他司法管辖区内的其他美国银行关联企业或营业地，包括美国或资料保护法

律提供的法律保护程度可能低于员工或承包商原属司法管辖区法律保护程度的其他司法管辖区。下面的链接列出了美国银行有限公司集团的关联企业。还没有获得互联网访问权限的新员工和承包商在提出要求后可以获取该清单。

[美国银行公司集团](#)

美国银行公司集团，**本公司可依据适用法律**，向为本公司提供服务的特定第三方披露相关个人资料。若个人资料处理委托于第三方资料处理商，比如适用于员工的[附录 A](#) 以及适用于承包商的[附录 B](#) 中所列的资料处理商，本公司将以书面形式对有关处理进行委托，选择就管理相关处理的技术和组织安全措施（比如资料保护和信息安全要求）提供足够保证的资料处理商，并确保该处理商代表本公司行事并遵从本公司指示。在适用法律允许的情况下，出于本公司或其任何子公司或关联企业的公司重组、出售或资产转让、合并、撤资或其他财产状态变更的有关事宜，也可予以披露个人资料。在遵守适用法律的前提下，出于保护员工和承包商的切身利益、保护本公司合法利益（此行为会侵害员工或承包商的权利和自由或利益时除外）的目的，或依本公司判断为遵守适用法律或法规义务和监管调查或要求，也可发布个人资料。

安全性

本公司维持适当的技术和组织措施，以防止未经授权或非法处理个人数据，和/或防止个人数据意外丢失、篡改、披露或访问、意外或非法销毁或破坏。

个人数据的访问、可移植性、纠正和抑制、处理限制和约束以及准确性

员工和承包商有权访问本公司持有的有关其本人的个人资料（享有法律特权的任何文件、提供其他员工或承包商的个人资料的文件或其他不属于资料当事人访问权限的文件除外）。任何员工或承包商若想访问其本人的个人资料或（适用法律允许的情况下）请求移植其资料，应联系人力资源部人员，联系信息见下述“问题”章节。

在适用法律要求的范围内，员工和承包商有权更正或删除不准确的数据（任何时候均可，不向员工或承包商收取任何费用）或者限制或约束其数据的处理。

为了帮助本公司维护准确的个人资料，员工和承包商必须确保其在本公司全球人力资源系统中记录的个人资料及时更新。若本公司发现其记录的个人资料有任何不准确之处，将于实际可行的最早时间内进行更正。

在根据适用法律可获得的范围内，员工和承包商也可以享有以下权利（包括但不限于）：

索取本公司持有的个人资料副本（作为上述访问要求的一部分）；

要求取得与本公司就其个人资料采取的惯例和流程有关的进一步信息或就此类惯例和流程请求投诉；

反对、撤销同意、限制或要求中止本通知中所述的其个人资料的收集、使用、披露以及其他处

理，以及要求本公司删除有关个人资料。

对于所有咨询，员工和承包商应联系人力资源部人员，联系信息见下述“问题”章节。根据适用法律，在若干情况下，本公司可免除或有权拒绝上述要求或权利。某些其他条款和条件可能适用于处理要求或权利，比如要求以书面方式通讯或要求提供身份证明。

处理形式和资料保留

本公司对员工或承包商流程不采取自动化决策。“自动化决策”是在没有人干预的情况下通过自动化的方法进行决策的流程。

个人资料的收集、使用、披露、传输以及其他处理（包括存储）可能以电子或手动方式进行，其中包括通过纸质或电子文件或其他适当技术进行。个人资料可存储在员工或承包商的原属司法管辖区和/或本公司经营业务所在的其他司法管辖区。

本公司将按照适用法律要求的保留期限或“个人数据收集和使用目的”章节中所述的使用和处理目的所需的期限保留个人资料，以两个期限中较长者为准。保留期限将以适用法律规定的最短/最长存储期限为准。本公司将在适用保留期限结束后删除个人资料。

用于决定保留期限的标准包括：

只要我们与员工或承包商继续保持关系；

我们需要履行的法律责任需要；

根据我们的法律立场（比如就适用的法定时效、诉讼或监管调查而言）适当合理。

问题

任何员工或承包商如对本通知有任何问题、疑惑或投诉，请联系人力资源服务中心，电子邮件：hrsc.apac@baml.com，或电话：00800.2722.4772 或 +65.6591.1166。

在某些国家/地区，如果您对本公司更广泛地处理您个人资料的方式有其他疑问，请使用以下联系方式与当地资料保护官联系：

亚太地区司法管辖区	connect.dpo@bofa.com
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员工和承包商有权向当地的资料保护机构提出投诉。

本通知的变更

若本公司要实质性地修改其收集或使用个人资料的方式、其收集的个人资料的类型或本通知的任何其他方面，将通过重新发出修订后的通知或依据适用法律采取其他措施，包括在法律要求时取得必要等级的员工和承包商同意，尽快通知员工和承包商。

司法管辖区专用条款

中华人民共和国

（“中国”，对于本通知之目的，不包括香港特别行政区、澳门特别行政区和台湾）

附录 C中的列表列出了接收我们作为在中国的数据控制者（可独立确定个人数据处理活动中的处理目的和处理方法）向其传输个人数据的组织和中国境外的其他接收方，他们各自的联系方式以及关于此等组织处理您的哪些个人数据、如何处理、为什么处理、

（要求时）如何对这些组织行使您的数据隐私权等详细信息。

适用法律要求或允许时，我们可能会以合理考虑并尽量减轻对您的权利和利益的负面影响的方式，出于雇佣目的处理敏感个人数据。

根据中国银行保险监督管理委员会(CBIRC)上海监管局的规定，在上海经营的银行保险机构必须向CBIRC上海监管局披露特定的员工雇用和离职信息，包括在公司任职期间的雇用状

况、工作流动和纪律处分信息。此类信息记录在CBIRC 上海监管局的系统中，供辖内其他银行保险公司查询。

关于本通知的同意书

我已阅读日期为 2022 年 2 月 1 日的“员工与承包商资料保护通知”。本人明确及自愿同意其条款的应用，条款关于本公司在本人受雇或受聘期间以及就该期间收集、处理、使用和跨国传输本人的个人资料（包括敏感的个人资料，以及将本人的个人资料跨国传输至当地资料保护法律提供的法律保护程度可能低于本人原属司法管辖区法律保护程度的司法管辖区）。

本人确认，在向本公司提供其他个人的任何个人资料（如适用）前，本人已向他们妥善提供有关本通知所述个人资料处理及其相关权利的所有信息，并且本人已就需要时处理其个人资料取得他们的明确许可（且适用时提供书面形式或单独的同意）。

请参阅关于如何同意本通知的说明。

请勾选（适用项）、签字、扫描并将签字后文件提交给您当地的 HR 团队：**中国**：

公司将按本通知规定以及超链接至相应章节的“Cookie 政策”中的进一步规定处理个人数据。我同意该等使用。

公司将处理并保留敏感个人数据（例如，生物特征信息、信用卡信息、相关的位置数据），详见本通知的“个人数据收集和使用目的”章节。我同意该等使用。

公司将向中国境内的第三方传输个人数据，详见本通知的“披露”和“司法辖区专用条款”章节。我同意该等传输。

公司将向中国境外的第三方传输个人数据，详见本通知的“披露”和“司法辖区专用条款”章节。我同意该等传输。

员工姓名

签名

日期

附录 A - 员工

参见[此处](#)链接的矩阵，以查看以下可能为了各种用途之目的收集的数据类型综述。还没有获得互联网访问权限的新员工在提出要求后可以获取该矩阵。

我们可能收集、使用、传输和披露的个人资料的类别，除非受适用法律限制

招聘/申请人信息：入职前参考；工作经历；使用的语言；之前的薪酬；视频记录。

聘用和工作信息：职衔和/或职位以及责任/职责的描述；同类工作；地点；级别/资历；员工身份标识；部门；业务线和子业务线；当地公司实体名称；成本中心信息；就业日期；主管/经理/团队领导姓名及联系信息；工作联系信息；解雇详情。

个人人口统计信息：出生日期和出生地；家属出生日期；国籍；性别；姓名（包括出生名和任何其他曾用名）；家属完整姓名；家庭/婚姻状况；出生证明副本；服兵役详情。

签证/公民身份详情：工作资格状态；居住权；公民身份；护照详情；签证详情；身份证号码。

联系详情：地址、电话、电子邮件和紧急联系方式。

工资：社会保险号或其他税务识别号；MyNumber；银行账户详情；完整地址；税收和社会保障缴款；工资支付、扣款及其他财务信息；班次和加班数据；纳税申报表，例如 P60 表格（英国）。

员工管理：推荐信；查询管理记录；弹性工作请求；视频记录（例如员工大会）。

全球流动性：差旅信息（包括商务签证详情、差旅记录和行程）。

缺勤数据：缺勤详情，例如病假、休假和产假。

考勤数据：工作时间指令详情。

人身安全和生命安全资料：刷卡入口数据；闭路电视；照片（安全身份证）；事件和事故报告；生物统计信息；工作场所健康和安全管理所需的数据。

薪酬：薪酬信息（包括基本工资、市场费率、激励报酬、股票期权信息和津贴）。

养老金：退休计划相关信息。

员工福利：福利记录及相关信息，例如健康保险、人寿保险

教育和培训：学业成绩、专业资格和会员资格；专业培训；公司内部培训；视频记录。

监管资料（如适用）：许可证和证书；金融监管注册；录音。

继任计划详情：报告结构；人才管理和继任计划资料（包括流动偏好、分配到人才库的日期、人才库名称和描述、专业领域、一般管理经验、领导行为、强项和发展需求）。

绩效/发展计划/全面考核：绩效相关信息（包括评估和评级（结果评级、行为评级、潜力评级）、绩效目标描述、关键能力描述。

ER 个案/合规/法律管理：发展领域、辅导笔记、他人反馈、自我评估描述、经理评审描述、绩效期望、衡量标准、行动日期、经理进步笔记；职业发展信息；就业处分记录、活动及调查；与提出的任何投诉有关的信息。

技术信息：包括用户名和密码、声音数据、IP 地址、域、浏览器类型、操作系统、点击流数据和系统日志以及您在使用本公司系统或履行本公司职责时编制或产生的电子及非电子内容和文件。

证券和股票交易：外部业务活动和管理职位详情（如果与雇佣相关目的有关）；证券和股票交易活动/经验（如果与雇佣相关目的有关）。

敏感个人资料：例如，种族或民族本源、身体和/或精神健康、刑事指控/定罪、宗教或哲学信仰、生物统计信息、工会成员。

多元化和包容性数据（例如，退伍军人身份、种族、民族、年龄、残疾身份、性倾向、性别、性别认同和性别表达）。

签名，包括数字图像和物理副本

虚拟或面对面活动数据：参加虚拟或面对面活动所需的信息：演讲人简介、旅行详情、配偶/伴侣姓名、通过参加活动的父母或监护人收集的孩子姓名和年龄、参加活动的个人的饮食要求、参加活动的个人的特别协助需求。

我们可能收集、使用、传输和披露个人数据的目的：

行政管理和管理员工雇佣关系，一般行政和预算；准备、管理和使用内部通信。

招聘活动、人才管理及继任计划。

员工身份验证/身份识别，包括语音验证（例如用于服务台）。

人力资源信息系统（“HRIS”）和应用程序支持与开发。

信息技术和信息安全支持（包括防火墙监控、反垃圾邮件和病毒防护以及其他监控，例如根据本公司的区域网络安全监控通知）。

内部业务运作的管理（包括监控公司政策和程序的遵守情况，例如根据本公司的区域网络安全监控通知）。

遵守适用的政府报告以及其他当地和外国法律要求（包括《美国萨班斯-奥克斯利法案》或其他适用的内部控制法规的要求以及移民、税务或法定金融监管等领域的要求）以及其他法定义务，但需符合适用法律。

工资和薪酬管理、行政工作和处理（包括薪酬标准和决定、奖金计算和股份计划管理）。

遵守当地或外国和/或国家/地区的特定税收和移民法律法规及工资报告，包括但不限于差旅。

福利和保险行政管理（包括有关员工贷款申请资格的决定）。

促进职业规划和成长。

培训、建议和咨询目的。

员工绩效和生产考核/评估和一般绩效管理。

辩护、准备、参加和回应潜在合法主张、调查和监管质询（所有都在适用法律允许的情况下）。

纪律处分/调查（适用法律允许的情况下）。

顾客和客户服务及营销活动（包括但不限于纳入内外部互联网及内联网网站、营销材料、活动管理材料、交易文件、投标书，以及出于向我们的客户提供服务和产品所需）。

管理与客户和其他第三方（包括符合适用法律的许可和注册机构、法律顾问、证券交易所或业务对手方）的关系。

离职后的用途（例如，提供就业参考，评估重新聘用资格，以及上述任何在离职后期间可能适用的用途）。

协助信息技术运营支持（包括系统维护和漏洞修复）。

促进公司设施中安全和健康的工作条件。

多元化与包容性数据经汇总后用于报告和晋升之目的。多元化与包容性数据（不包括残疾情况）在识别个人的基础上用于人才管理、继任计划和培训与会议机会。

供以前员工参与的公司校友计划。

虚拟或面对面活动（包括参与虚拟或面对面活动所需的信息）。在适当的情况下，这可能包括关于您配偶和子女的信息。[在虚拟或面对面活动中，可能在以下情况中收集个人数据或其他信息：个人为了注册一项活动、参加一项活动、询问活动信息、下载内容通过网络访问我们，或者通过我们的客户关系合作伙伴分享参加某项活动的兴趣。

开展志愿者和捐赠计划

我们可能与其分享个人信息的非关联第三方的类别

专业顾问：会计师、审计师、律师、保险公司、银行业者、税务顾问，以及本公司经营业务所在的所有国家/地区的其他外部专业顾问。

服务提供商：在本公司运营所在国家/地区为本公司提供产品和服务的公司，比如工资、合作伙伴银行、养老金计划、福利提供商；人力资源服务、招聘和培训提供商；绩效管理、培训、费用管理、IT 系统供应商和支持；接待和安保、餐饮和物流服务提供商、翻译服务、协助组织活动和营销的第三方、医疗或健康从业员、行业团体和协会，以及其他服务提供商。

公共和政府机构：在本公司经营业务所在的国家/地区监管本公司或对本公司拥有司法管辖权的实体，比如监管机构、执法机构、公共机构、许可和注册机构、司法机构以及上述机构指定的第三方。

工会：员工所属工会。

与公司交易有关的各方：与任何提议或实际重组、合并、出售、合资、分配、转让或对全部或部分本公司业务、资产或股票（包括与任何破产或类似诉讼有关）进行其他处置有关的第三方，例如证券交易所和商业交易对手。

在适当的情况下，本公司将提供和接受合理的第三方（例如服务提供商）协助，以回应数据主体的访问请求。

当前和潜在客户与顾客。

活动供应商：活动供应商、组织者、演讲人、志愿者、承包商和促成活动的主办者

附录 B - 承包商

参见[此处](#)链接的矩阵，以查看以下可能为了各种用途之目的收集的数据类型综述。还没有获得互联网访问权限的新承包商在提出要求后可以获取该矩阵。

我们可能收集、使用、传输和披露的个人资料的类别，除非受适用法律限制：

招聘/申请人信息：入职前参考；工作经历；使用的语言；之前的薪酬；视频记录。

位置信息：职衔和/或职位以及责任/职责的描述；同类工作；地点；级别/资历；承包商身份标识；部门；业务线和子业务线；当地公司实体名称；成本中心信息；聘用日期；主管/经理/团队领导姓名及联系信息；工作联系信息；解雇详情。

个人人口统计信息：出生日期和出生地；家属出生日期；国籍；性别；姓名（包括出生名和任何其他曾用名）；家属完整姓名；家庭/婚姻状况。

签证/公民身份详情：工作资格状态；居住权；公民身份；护照详情；签证详情；身份证号码。

联系详情：地址、电话、电子邮件和紧急联系方式。

承包商管理：推荐信；查询管理记录；工作安排请求；语音记录；视频记录（例如员工大会）。

全球流动性：差旅信息（包括商务签证详情、差旅记录和行程）。

缺勤数据：缺勤详情，例如病假、休假和产假。

考勤数据：工作时间指令详情。

人身安全和生命安全资料：刷卡入口数据；闭路电视；照片（安全身份证）；事件和事故报告；生物统计信息；工作场所健康和安全管理所需的数据。

薪酬：薪酬信息（包括工资标准）。

承包商福利。

教育和培训：学业成绩、专业资格和会员身份；公司内部培训；视频记录。

监管数据（在适用的情况下）：例如音频记录；视频记录（例如员工大会）。

ER 个案/合规/法律管理：与提出的任何投诉/调查相关的信息、行动日期。

技术信息：包括用户名和密码、声音数据、IP 地址、域、浏览器类型、操作系统、点击流数据和系统日志以及您在使用本公司系统或履行本公司职责时编制或产生的电子及非电子内容和文件。

证券和股票交易：外部业务活动和管理职位详情（如果与雇佣相关目的有关）；证券和股票交易活动/经验（如果相关）

敏感个人资料：例如，种族或民族本源、身体和/或精神健康、刑事指控/定罪、宗教或哲学信仰、生物统计信息、工会成员。

签名，包括数字图像和物理副本

虚拟或面对面活动数据：参加虚拟或面对面活动所需的信息，包括演讲人简介、旅行详情、配偶/伴侣姓名、通过参加活动的父母或监护人收集的孩子姓名和年龄、参加活动的个人的饮食要求、参加活动的个人的特别协助需求。除非活动直接与工作任务相关，否则承包商不得参加活动。

我们可能收集、使用、传输和披露个人数据的目的适用于承包商：

行政管理、签约和管理员工雇佣关系，一般行政和预算；准备、管理和使用内部通信。

招募活动与资源规划。

承包商身份验证/身份识别，包括语音验证（例如用于服务台）。

人力资源信息系统（“HRIS”）和应用程序支持与开发

信息技术和信息安全支持（包括防火墙监控、反垃圾邮件和病毒防护以及其他监控，例如根据本公司的区域网络安全监控通知）。

内部业务运作的管理（包括监控公司政策和程序的遵守情况，例如根据本公司的区域网络安全监控通知）。

遵守适用的政府报告以及其他当地和外国法律要求（包括《美国萨班斯-奥克斯利法案》或其他适用的内部控制法规的要求以及移民、税务或法定金融监管等领域的要求）以及其他法定义务，但需符合适用法律。

薪酬管理（包括关于工资标准）。

遵守当地或外国和/或国家/地区的特定税收和移民法律法规，包括但不限于差旅。

福利管理。

培训、建议和咨询目的。

承包商评估。

辩护、准备、参加和回应潜在合法主张、调查和监管质询（所有都在适用法律允许的情况下）。

调查（适用法律允许的情况下）。

顾客和客户服务及营销活动（包括但不限于纳入内外部互联网及内联网网站、营销材料、活动管理材料、交易文件、投标书，以及出于向我们的客户提供服务和产品所需）。

管理与客户和其他第三方（包括符合适用法律的许可和注册机构、法律顾问、证券交易所或业务对手方）的关系。

离职后的用途（例如，提供承包商参考，评估重新聘用资格，以及上述任何在离职后期间可能适用的用途）。

协助信息技术运营支持（包括系统维护和漏洞修复）。

促进公司设施中安全和健康的工作条件。

多元化与包容性报告。

虚拟或面对面活动（包括参与虚拟或面对面活动所需的信息）。在适当的情况下，这可能包括关于您配偶和子女的信息。[在虚拟或面对面活动中，可能在以下情况中收集个人数据或其他信息：个人为了注册一项活动、参加一项活动、询问活动信息、下载内容通过网络访问我们，或者通过我们的客户关系合作伙伴分享参加某项活动的兴趣。除非活动直接与工作任务相关，否则承包商不得参加活动。

我们可能与其分享个人信息的非关联第三方的类别

专业顾问：会计师、审计师、律师、保险公司、银行业者、税务顾问，以及本公司经营业务所在的所有国家/地区的其他外部专业顾问。

服务提供商：在本公司运营所在国家/地区为本公司提供产品和服务的公司，比如，福利提供商

；人力资源服务、招聘和培训提供商；培训、费用管理、IT 系统供应商和支持；接待和安保、餐饮和物流服务提供商、翻译服务、协助组织活动和营销的第三方、行业团体和协会，以及其他服务提供商，在适用的情况下包括您的雇主或公司。

公共和政府机构：在本公司经营业务所在的国家/地区监管本公司或对本公司拥有司法管辖权的实体，比如监管机构、执法机构、公共机构、许可和注册机构、司法机构以及上述机构指定的第三方。

工会：承包商所属工会。

与公司交易有关的各方：与任何提议或实际重组、合并、出售、合资、分配、转让或 对全部或部分本公司业务、资产或股票（包括与任何破产或类似诉讼有关）进行其他处置有关的第三方，例如证券交易所和商业交易对手。

当前和潜在客户与顾客。

活动供应商：活动供应商、组织者、演讲人、志愿者、承包商和促成活动的主办者除非活动直接与工作任务相关，否则承包商不得参加活动。

附录 C

我们可能向其披露个人数据的组织

关于权利的详细信息包含在通知的“**个人数据访问、可携带性、纠正和抑制、限制和禁止处理及准确性**”章节

研发母业务实体名称	联系信息	处理目的和方法	个人信息的类别
AIA GROUP LIMITED	AIASH Compliance - cn.aiashcompliance@aia.com ; 电话 : 86-21-53599988	福利和保险行政管理 (包括有 关员工贷款申请资格的决定) 。	员工福利：福利记录及相关信息， 例如健康保险、人寿保险
ALIGHT SOLUTIONS LLC	privacy.info@alight.com	人力资源信息系统 （“HRIS”）和应用程序支持 与开发。	聘用和工作信息：职衔和/或职位 以及责任/职责的描述；同类工作 ；地点；级别/资历；员工身份标 识；部门；业务线和子业务线；当 地公司实体名称； 成本中心信息 ；就业日期；主管/经理/团队领导 姓名及联系信息；工作联系信息； 解雇详情。
AMS BIDCO LTD	PCMailboxAsiaPac@weareams.com	招聘活动、人才管理和接任规 划；促进职业规划和成长；面 向过往员工参与的企业校友计 划	招聘/申请人信息：入职前参考； 工作经历；使用的语言； 之前的 薪酬 ；视频记录。
AUTOMATIC DATA PROCESSING, INC.	privacy@adp.com	工资和薪酬管理、行政管理和 处理（包括薪酬指标和决策、 奖金计算和股票计划管理）； 遵守当地或外国州和/或 国家/ 地区 的 税务和移民法律法规 以 及工资申报，包括但不限于差 旅。	工资：社会保险号或其他税务识别 号；MyNumber；银行账户详情； 完整地址；税收和社会保障缴款； 工资支付、扣款及其他财务信息； 班次和加班数据；纳税申报表

<p>中国国际技术智力合作 集团有限公司CHINA INTERNATIONAL INTELLECTECH GROUP CO.,LTD.</p>	<p>Yong, Guangming 先生 gastuyong@ciicsh.com +8621 3397 2334</p>	<p>工资和薪酬管理、行政管理和 处理（包括薪酬指标和决策、 奖金计算和股票计划管理）； 遵守当地或外国州和/或国家/ 地区的税务和移民法律法规以 及工资申报，包括但不限于差 旅。</p>	<p>工资：社会保险号或其他税务识别 号；MyNumber；银行账户详情； 完整地址；税收和社会保障缴款； 工资支付、扣款及其他财务信息； 班次和加班数据；纳税申报表</p>
<p>Cybergrants, Inc.</p>	<p>privacy@cybergrants.com</p>	<p>员工志愿者和匹配礼物计划管 理。</p>	<p>员工信息包括姓名、银行联系信息 （包括电子邮件和电话号码）、家 庭住址和国家代码、美国银行聘用 日期和乐队级别</p>
<p>ECHOSPAN, INC.</p>	<p>privacy@echospan.com</p>	<p>员工绩效和生产考核/评估 和一般绩效管理。</p>	<p>绩效/发展计划/全面考核：绩效相 关信息（包括评估和评级 （结果评级、行为评级、潜力评级 ）、绩效目标描述、关键能力描述 。</p>
<p>EQUUS SOFTWARE, LLC</p>	<p>michael.haskins@equusoft.com</p>	<p>管理员工雇佣关系、一般行政 管理和预算管理；内部通信的 编写、管理和使用；遵守当地 或外国州和/或国家/地区的税 务和移民法律法规及工资申报 ，包括但不限于差旅。</p>	<p>全球流动性：差旅信息（包括商务 签证详情、差旅记录和行程）；签 证/国籍详情：工作资格状态；居 住权；公民身份；护照详情；签 证详情；身份证号码；个人基本信 息：出生日期和出生地；家属出生 日期；国籍；性别；姓名（包括 出生名和任何其他曾用名）；家属 完整姓名；家庭/婚姻状况；出生 证明副本；</p>

FRAGOMEN, DEL REY, BERNSEN & LOEWY, LLP	dataprivacy@fragomen.com	管理员工雇佣关系、一般行政管理 和预算管理；内部通信的编写、 管理和使用；遵守当地或外国州和/ 或国家/地区的税务和移民法律规 及工资申报，包括但不限于差旅。	全球流动性：差旅信息（包括商务 签证详情、差旅记录和行程）；签 证/国籍详情：工作资格状态；居 住权；公民身份；护照详情；签 证详情；身份证号码；个人基本信 息：出生日期和出生地；家属出生 日期；国籍；性别；姓名（包括 出生名和任何其他曾用名）；家属 完整姓名；家庭/婚姻状况；出生 证明副本；
MERCER MARSH	privacyofficer.china@mercer.com	福利和保险行政管理（包括有 关员工贷款申请资格的决定） 。	员工福利：福利记录及相关信息， 例如健康保险、人寿保险

O. C. TANNER COMPANY	privacy@octanner.com	行政管理和管理员工雇佣关系· 一般行政和预算；准备、管理和使用内部通信。	联系详情：地址、电话、电子邮件和紧急联系方式。
OLEEO PLC	dataprotectionofficer@oleeo.com	招聘活动、人才管理和接任规划；促进职业规划和成长；面向过往员工参与的企业校友计划	招聘/申请人信息：入职前参考；工作经历；使用的语言；之前的薪酬；视频记录。
SIRVA, INC.	secadmin2@sirva.com	管理员工雇佣关系、一般行政管理和预算管理；内部通信的编写、管理和使用；遵守当地或外国州和/或国家/地区的税务和移民法律法规及工资申报· 包括但不限于差旅。	全球流动性：差旅信息（包括商务签证详情、差旅记录和行程）；签证/国籍详情：工作资格状态；居住权；公民身份；护照详情；签证详情；身份证号码；个人基本信息：出生日期和出生地；家属出生日期；国籍；性别；姓名（包括出生名和任何其他曾用名）；家属完整姓名；家庭/婚姻状况；出生证明副本；
SPENCER STUART STAR US INC.	Privacy@kincentric.com	培训、建议和咨询目的。	教育和培训：学业记录；专业培训；公司内部培训；视频记录。
THE MYERS-BRIGGS COMPANY	Bchapman@themyersbriggs.com	培训、建议和咨询目的。	教育和培训：学业记录；专业培训；公司内部培训；视频记录。
WILLIS TOWERS WATSON PUBLIC LIMITED COMPANY	privacy@willistowerswatson.com	工资和薪酬管理、行政工作和处理（包括薪酬标准和决定、奖金计算和股份计划管理）。	薪酬：薪酬信息（包括基本工资、市场费率、激励报酬、股票期权信息和津贴）。