



NPD Employee Data Privacy Notice: People's Republic of China

1. Scope of Notice and Consent

通知及同意范围

This Notice applies to each employee (“you”) of NPD Information Consulting (Shanghai) Co., Ltd. of Room 901-902, No. 1568 Huashan Road, Changning District, Shanghai (“NPD China”). The data administrator of your personal data is NPD China and in limited cases both NPD China and The NPD Group, L.P. of 900 West Shore Road, Port Washington, NY 11050 U.S. (collectively hereinafter, “NPD”, “we” or “us”).

本通知适用于恩帛源信息咨询（上海）有限公司，地址为上海市长宁区华山路1568号901-902室（“NPD 中国”）的每位员工（“您”）。您个人资料的数据管理者是NPD中国，在某些情形下是NPD中国及NPD集团公司（地址为900 West Shore Road, Port Washington, NY 11050 U.S.）（以下合称为“NPD”或“我们”）。

This Notice sets out relevant information regarding the privacy and protections accorded to your personal data by or on behalf of NPD. Additional details regarding privacy and protection may be found in the NPD Authorized Use Policy and the NPD Information Security Policy and such other policies as NPD may implement, which can be found at <https://npdinsider.npd.com/wps/myportal/npdintr/insider/it-ops/information-security/policies/>. When used in this notice, the term “personal data” means any data that directly or indirectly identifies an individual, such as a name, phone number or one or more factors specific to that individual’s physical, physiological, mental, economic, cultural or social identity.

本通知规定了关于隐私及由NPD或代表NPD给予您个人资料保护的相关信息。其它关于隐私及保护的详细信息规定在NPD授权使用政策、NPD信息安全政策及其它NPD实施的政策中，可参见<https://npdinsider.npd.com/wps/myportal/npdintr/insider/it-ops/information-security/policies/>。在本通知中，“个人资料”是指任何可以直接或间接识别出某个人的信息，如姓名、电话号码或一个或多个针对某个人身体、生理、心理、经济、文化或社会身份的特定因素。

By giving your explicit consent by checking the relevant box(es) under the consent notice below, you agree that NPD will use, collect, disclose, transfer and otherwise process your personal data as set out in this Notice.

当在下文同意声明项下勾选相关选项后，您明确同意NPD可以依本通知所述而使用、收集、披露、转移并处理您的个人信息。

2. Purposes of Processing Your Personal Data 处理您个人信息之目的

Your personal data will be processed by NPD for the following purposes, including but not limited to: NPD将为下述目的处理您的个人信息，包括但不限于：

- a. Management of NPD workforce, including: general management of employees; payroll; hiring; benefits and compensation; determining physical and/or mental fitness for work; reviewing and evaluating employee performance; monitoring attendance; investigating suspected misconduct or non-performance of duties; head count analysis; senior staff succession planning; employee training, appraisal and promotion; employee travel; management forecasting; employee discipline and termination; negotiation with trade unions or other employee representatives;
NPD劳动力管理，包括员工一般管理；工资单；招聘；福利和补偿；确定身体和/或精神是否健康并适于工作；审查和评价员工绩效；监测考勤；调查涉嫌不当行为或不履行职责的行为；职员人数分析；高级员工继任规划；员工培训，考核和晋升；员工旅行；管理预测；员工纪律和解除；与工会或其他员工代表谈判；
- b. Management and development of the business of The NPD Group, L.P. and entities within its group of companies (the “Group”);
管理和发展NPD集团公司及其集团公司内部其他实体（“集团”）的业务；
- c. Administration of NPD and Group policies and procedures;
管理NPD及集团政策和程序；

- d. Compliance with an obligation imposed by local, national, federal or any other applicable law or regulation;
遵守由地方、国家、联邦或任何其他适用的法律法规规定的义务；
- e. Management of assets and facilities, including security thereof;
管理资产及设施，包括安全设施；
- f. Providing IT and information processing support and IT applications and systems maintenance;
提供信息技术及信息处理支持和IT应用程序及系统维修；
- g. Monitoring IT systems to prevent any use contrary to Group policies and/or criminal or civil offenses;
监控IT系统以防止任何违反公司政策和/或刑事或民事法律的使用；
- h. Monitoring and preventing sexual or other unlawful harassment, discrimination and/or criminal or civil offenses where warranted by a specific set of circumstances;
监督并防止性骚扰或其他非法骚扰、歧视和/或其他特定刑事或民事违法情形；
- i. Provision of Group services and other services (such as IT and communication systems);
提供集团服务及其他服务（如IT及通讯系统）；
- j. Analyzing, preparing or effecting any planned or contemplated structural change or reorganization implicating a Group company, function or department;
分析、筹划或实施任何计划的或预期的涉及一个集团公司、公司职能或部门的结构变化或改组；
- k. Analyzing, preparing or effecting any planned or contemplated restructuring, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of any member of the Group;
分析、筹划或实施任何计划的或预期的重组、出售或资产转让、合并、取缔或其他集团成员的控制权变动或财务状况变动；
- l. Protecting and defending any Group company's rights and interests (including in connection with any administrative, court, arbitral or mediation proceeding);
保护并维护任何集团公司的权利及利益（包括与任何行政的、诉讼、仲裁或调解程序有关的权利及利益）
- m. Preserving or defending any Group company's rights in court, responding to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities (including tax and employment);
保护或维护任何集团公司在法庭上，或在适用的法律、法院命令、政府法规、或政府机构（包括税务及就业）要求或准许下的权利，回应执法部门请求或调查程序；
- n. Communicating within the Group and with third parties in furtherance of the foregoing;
在集团内部及和第三方沟通以促进上述目的；
- o. Managing, updating, storing, archiving and deleting personal data in support of the Group's activities related to any of the foregoing purposes; and
管理、更新、存储、存档及删除个人资料以支持集团与任何前述目的相关的行为；
- p. Otherwise where permitted or required by applicable laws or regulations.
其他适用的法律或法规允许或要求的目的。

Your personal data will be processed by NPD by electronic means as well as by organized filing systems of hardcopy documents.

您的个人资料将由NPD使用电子手段进行处理并由文件归档系统整理纸质文件。

The provision and the processing of your personal data is mandatory. If personal data is not provided, or if you do not give us your consent to the collection, use, disclosure, transfer and/or other processing of your personal data, or if you object to, or otherwise withdraw your consent to, the processing of your personal data, it is likely that NPD will not be able to manage or administer the employment relationship between you and NPD China.

提供及处理您的个人资料是强制的。若不提供个人资料或您不同意收集、使用、披露、转移和/或其他对您个人资料的处理，或反对或撤回对处理个人资料的同意，则NPD有可能无法管理您与NPD中国间的劳动关系。

3. Types of Personal Data Processed 处理的个人资料的类型

NPD processes different types of your personal data in accordance with applicable laws and regulations:

NPD根据适用的法律法规处理您不同类型的个人资料：

- Contact information (such as your name, user name, address, email address and phone number);
联系信息（如您的姓名、用户名、地址、电子邮件地址及电话号码）；
- Date of hire or re-hire;
雇佣或再次雇佣日期；
- Nationality;
国籍；
- Place and date of birth;
出生地及出生日期；
- Driver's license number, social security number, social insurance number, national ID, tax number and other governmental identifiers;
驾驶证号码、社会保险号码、社保帐号、居民身份证、税号及其他政府识别信息；
- Gender;
性别；
- Marital status;
婚姻状况；
- Disability status;
伤残状况；
- Military status;
服役状况；
- Psychometric and ability test results;
心理及能力测试结果；
- Information relating to job positions (such as your employee ID, job title, company, department number, supervisor, business phone and business email, standard hours, performance ratings);
与工作岗位有关的信息（如您的员工编号、职务、公司、部门编号、主管、工作电话及工作电邮、标准工作时间、绩效等级）；
- Training courses;
培训课程；
- Emergency contact details;
紧急联系人信息；
- Payroll information, including salary, compensation, benefits information, including bank details and payroll frequency;
工资信息，包括薪水、补偿金、福利信息、包括银行业务明细及工资发放频率；
- Payment information;
付款信息；
- Pension arrangements, medical insurance arrangements, life assurance arrangements and details of beneficiaries, if any;
养老金计划，医疗保险计划，人寿保险计划及受益人信息，如有；
- Absences and leaves;
缺勤及休假；
- Information relating to benefits, if any;
福利相关信息，如有；
- Information relating to expenses, if any;
费用相关信息，如有；
- Experience information (such as your resume information and summary of employment history and educational background, skills, records and appraisals, and statements of opinion or intention);
经历信息（如您的简历及工作经历概要及教育背景、技能、记录及评价、意见或意图陈述）；
- Use of NPD assets and facilities;
使用 NPD 资产及设施；
- Employment documents, including but not limited to copies of employment contracts, IDs, birth certificate, educational degrees, medical checks, criminal checks;
聘用文件，包括但不限于劳动合同、身份证、出生证明、受教育程度、体检、犯罪记录检查；

- Date of and reason for cessation of employment and post-employment contact information (if applicable); and
雇佣终止日期及原因，离职后合同信息（如适用）；及
- Logging and other records of communications within the Group and with third parties in furtherance of the purposes set forth in Section 2. above.
记录及其他在集团内和与第三方的通讯记录以促进上述第二部分所列目的；

Your friend and family data (such as emergency contact and beneficiary details) will be processed by NPD solely if you provide it to NPD China and in order for NPD China to contact them when necessary. You are required to provide any such friends and family with a copy of this Notice and, where required, obtain their consent.

若您将您朋友及家人（如紧急联系人及受益人信息）的资料提供给NPD中国，为使NPD中国在必要时联系他们，则该等资料将仅由NPD单独处理。您需要向这些朋友及家人提供一份本通知副本，如需要，还应取得他们的同意。

Certain of the above types of personal data may be considered sensitive personal data and additional rules may apply in respect of sensitive personal data. When used in this Notice, the term “**sensitive personal data**” is defined under applicable laws and regulations and may include identity cards, mobile phone numbers and information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, criminal background, and health or sex life as well as biometric data.

特定上述类型的个人资料可能会被认为是敏感资料，将对其适用额外规定。在本通知中，“**敏感个人资料**”是在适用的法律法规项下进行定义，可能包括身份证、手机号码及披露种族或民族起源的信息、政治观点、宗教或哲学信仰、工会会员、犯罪记录、健康或性生活及生物特征资料。

4. Processing Your Personal Data 处理您的个人资料

NPD is committed to ensuring that all employee personal data is:

NPD承诺确保所有员工个人资料：

- Processed fairly and lawfully;
被公平且合法的处理；
- Processed for specific purposes only, and not in any manner incompatible with those purposes;
仅为特定目的进行处理，不以任何与此等目的不相符的方式进行处理；
- Adequate and relevant;
适当且相关；
- Kept accurate;
保持准确；
- Retained no longer than necessary;
仅在必要期间内保存；
- Processed consistent with your rights;
同您的权利相一致进行处理；
- Processed with your consent; and
经您同意而处理；及
- Kept secure.
保证安全。

5. Sharing Your Personal Data with Third Parties 同第三方共享您的个人资料

Where necessary in order for NPD China to perform its obligations to you, or for you to perform your job function, or for the purposes described in this Notice, NPD China will share your personal data with other Group entities, Group and third party service providers who maintain reasonable security practices commensurate with applicable law, government agencies and/or other third parties as described in this Notice or as permitted by applicable laws and regulations, such as Group customers. Details of the third party service providers with whom your personal data is shared are available at

https://npdinsider.npd.com/intranet_docs/legal/PRC-Third-Party-Service-Providers.pdf. In some cases, Group and third party service providers may be granted access to a specific Group database, but their access is restricted on a need-to-know basis via access limitations. Group entities and third parties with whom your data will be shared include:

为使NPD中国履行其对您的义务，或使您履行您的职能，或为本通知所述之目的，在必要的时候，NPD中国将同其他集团内实体、集团，及依照适用的法律能够维持合理的安全措施的第三方服务提供者，政府机构，和/或本通知所述或适用的法律法规所允许的其他第三方，如集团顾客，共享您的个人资料。与NPD中国共享您的个人资料的第三方服务提供者的详细信息可参见网址https://npdinsider.npd.com/intranet_docs/legal/PRC-Third-Party-Service-Providers.pdf。在某些情形下，集团及第三方服务提供者可能被授权进入一个特定的集团数据库，但是其登陆权限是受限的，仅在需要知晓的范围内。共享您资料的集团实体及第三方包括：

- the Group;
集团；
- NPD China's bank and payroll processor with whom we share information such as your ID number, address, telephone number, email address, salary, bank account information and housing fund registration number, etc. for the purposes of processing payroll and social insurance/housing fund registration and payment;
我们会因处理工资及社会保险/公积金登记及支付的需要而与NPD中国的银行及工资处理机构共享诸如您的身份证号码、地址、电话号码、电子邮件地址、薪水、银行账户信息及公积金登记号码等信息；
- applicable tax, social security and employment authorities, and mandatory fund administrators with whom we share information such as your ID number, address, telephone number, email address, salary, bank account information and housing fund registration number, etc. for the purposes of management of social insurance and housing fund;
我们会因管理社会保险及公积金的需要而与适格的税务、社保及就业机关，及强制的资金管理员共享诸如您的身份证号码、地址、电话号码、电子邮件地址、薪水、银行账户信息及公积金登记号码等信息；
- third party insurance and benefits providers (where applicable) with whom we share information such as your ID number, address and telephone number, etc. for the purposes of management of employees' supplementary insurance;
我们会因管理员工的补充保险的需要而与第三方保险及福利提供者（如适用）共享诸如您的身份证号码、地址、电话号码等信息；
- NPD HR and IT personnel responsible for HR management or IT processing and security functions;
NPD负责人力资源管理的HR及负责IT程序及安全性能的IT人员；
- third parties providing IT services and support for any of the purposes described in Section 2. above;
为上述第二部分所述之目的提供IT服务及支持的第三方；
- financial consultants, professional advisers and in-house and outside counsel;
财务顾问，专业顾问及内部和外部法律顾问；
- to potential or actual transaction partners or other third parties in connection with the consideration, negotiation or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate or transfer all or a portion of our assets;
and
潜在的或现实的交易合伙人或其他与公司交易（包括收购与合并另一家公司或出售、清偿或转移全部或部分我方资产）对价、磋商或完成相关的第三方；及
- where permitted by law or regulations and required as a part of your job function, Group customers or vendors or other third parties where this is helpful to developing the business (for example, to compete for, or meet obligations under, an existing or possible business contract).
经法律或法规许可，您的部分工作职能所要求，有助于开发业务的集团顾客或供应商或其他第三方（例如，争取取得潜在的业务合同或完成现存的或潜在的业务合同项下的义务）。

Wherever required under applicable law or regulations, NPD will enter into with affiliated and third party service providers data processing or similar agreements that require in particular that such service providers will maintain the same level of personal data protection as implemented by NPD and as required by applicable laws and regulations.

在适用的法律法规的要求下，NPD将与关联企业及第三方服务提供者签署数据处理或类似协议，特别要求该等服务提供者保持适用的法律法规所要求的，同NPD所践行的个人资料保护水平相同的水准。

6. Transfers of Data Outside of the People's Republic of China 在中华人民共和国以外的资料转移

Your personal data (as described in Section 3. above) may be transferred to other Group entities or to third parties described in Section 5. above, only to the extent necessary for NPD China to perform its obligations to you, or for you to perform your job function, or for the purposes described in this Notice. In particular:

在NPD中国履行其对您的义务，或您履行您的工作职能，或本通知所述的目的的必要范围内，您的个人资料（上文第三部分所述）可能被转移给其他集团实体或第五部分所述的第三方。特别是：

- Your professional profile and contact information contained in systems such as Outlook, SharePoint, and Workday, will be accessible to all employees of Group companies worldwide.
诸如Outlook、SharePoint及Workday等系统中所包含的您的专业个人简介及联系方式，可对集团公司全球范围内的所有员工可见。
- Your personal data may be transferred to Group headquarters in the U.S. and/or to Group employees located inside or outside your country, and/or to a person or company that is not part of the Group located in or outside your country, on a need-to-know basis.
您的个人资料可能被转移至位于美国的集团总部和/或位于您所在国家之内或之外的集团员工，和/或在需要知道的范围内转移给在您所在国家之内或之外的非集团公司一部分的个人或公司。

In some cases, transfers of your personal data may be made to countries that are considered by the European Commission or by other governmental entities or authorities to offer adequate protection to personal data. In other cases, transfers may be made to countries, like the U.S., that are not considered to offer adequate protection of personal data; transfers to those countries will be made pursuant to the standard contractual clauses approved by the European Commission, relevant national equivalents thereof, or other safeguards where permissible.

在某些情形下，您的个人资料可能被转移至欧洲委员会或其他政府实体或机构认为可以对个人资料提供充分保护的國家。在其他情況下，您的个人资料可能被转移至例如美国等国家，这些国家被认为无法对个人资料提供充分的保护，向这些国家转移个人资料需要遵循经欧洲委员会、与欧洲委员会类似的国家组织批准的标准合同性条款，或其他经准许的安全措施。

Transfers may be made to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable laws, court orders, government regulations, or government authorities (including tax and employment). Such transfers may entail access by courts or governmental authorities outside your country, after having ensured that only your minimal necessary data is disclosed and transferred, or that such data is de-identified or that, where possible, appropriate stipulative court orders have been issued.

进行资料转移可用来回应执法部门请求或调查程序，或在适用的法律、法院命令、政府法规、或政府机构（包括税务及就业）要求或许可下进行进行移转。在确保您的个人资料仅是在最小必要限度内被披露和转移的情形下，或该等资料被消除识别性，或在可能的情况下，由法庭作出恰当的法庭命令后，这种转移可使您所在国家以外的法庭或政府机构查阅到个人资料。

7. Data Security 资料安全

Your personal data will be secured by taking security measures that are commensurate with the sensitivity of the personal data processed. To this end, NPD maintains reasonable physical, technical, and administrative security measures (including IT system monitoring) with a view to protecting employee personal data against theft; accidental loss; unauthorized alteration; unauthorized or accidental access, processing, erasure, use, disclosure or copying; and/or accidental or unlawful destruction.

您的个人资料应按照所处理的个人资料的敏感性来采取安全措施保证其安全。为此目的，NPD采用合理的物理、技术及行政性安全手段（包括IT系统监控）致力于保护员工个人资料被盗窃；意外丢失；未经授权修改；未经授权或意外接触、处理、消除、使用、披露或复制；和/或意外或非法损毁。

8. Retention 留存

NPD will keep your personal data confidential and will retain your personal data for as long as you are employed by NPD China, and thereafter for the retention periods set out in our records management policy.

NPD将对您的个人资料保密并在您受雇于NPD中国期间留存您的个人资料，在您离职后，继续根据我们记录管理政策所述的留存年限进行留存。

9. Updating Employee Data 员工资料更新

You have the responsibility to ensure that changes in your personal data are notified to NPD China to be sure that all your data is kept up to date. See "Your Rights" below for information on how to do this.

您有责任保证将您个人资料的变更通知NPD中国以确保您的所有资料都是最新的。如何更新请见下文“您的权利”。

10. Your Rights 您的权利

You have the right under applicable law to access and correct personal data concerning you, subject to limited exceptions that may be prescribed by applicable law. Where justified and allowed by applicable law, you may also require that your personal data be deleted or blocked (including without limitation in the event of a data breach), or you may be entitled to withdraw your consent to processing, or object to further processing, of your personal data. You may also make a complaint about how your personal data is handled by us.

您有权利在适用的法律项下查阅并修改关于您的个人资料，除适用的法律规定的有限的几种例外情形之外。在适用的法律允许的情况下，您也可以要求删除您的个人资料或限制其使用（包括但不限于数据外泄的情况）或您有权撤回您对个人信息的许可，或反对进一步处理您的个人资料。您也可就我们如何处理您的个人信息提出申诉。

To obtain further information about our data protection policies and practices, and your right of access, correction, deletion, blocking, objection and complaint, and your responsibility to notify changes in your personal circumstances, as well as any other right you may have under applicable law, may be exercised by signed request or email as follows:

若要获得我们数据保护政策及惯例的进一步信息，及您查阅、更正、删除、限制、反对及申诉的权利和您告知公司您个人资料变更的责任及其他您可能享受的在适用法律项下的权利，需通过签署以下请求或邮件来执行：

- a. General requests may be made to your local HR department.
一般请求可以向当地人力资源部门发出。
- b. You can update selected data about you by logging into Workday.
您可以通过登录 Workday 来更新关于您的选定的数据。

11. Changes to this Notice 通知的变更

A copy of this Notice is available in the "Reviewed Documents" section of Workday that NPD employees can access. Unless we obtain your express consent, any material changes that we make to this Notice will only apply to personal data collected after the revised notice took effect.

NPD 员工可以登录 Workday 在“Reviewed Documents (阅读的文件)”部分查阅本通知副本。除非我们获得您的明确同意，我们对本通知作出的任何变更仅适用于通知修订生效后所收集的个人资料。

12. Language 语言

In the event of any inconsistency between the Chinese and English language versions of this Notice, the Chinese version shall prevail.

如本通知中文及英文版本出现不一致，以中文版本为准。

I ACKNOWLEDGE THAT I HAVE READ AND UNDERSTOOD THIS NOTICE, I HEREBY EXPRESSLY AUTHORIZE AND CONSENT TO THE COLLECTION, USE, HOLDING, DISCLOSURE, TRANSFER AND OTHER PROCESSING OF MY PERSONAL DATA (INCLUDING SENSITIVE PERSONAL DATA) AS DESCRIBED IN THIS NOTICE, AND I AGREE TO COMPLY WITH THIS NOTICE AT ALL TIMES. I SPECIFICALLY CONSENT TO THE TRANSFER OF MY PERSONAL DATA (INCLUDING SENSITIVE PERSONAL DATA) OUTSIDE OF THE PEOPLE'S REPUBLIC OF CHINA AS DESCRIBED IN THIS NOTICE.

我确认我已阅读并理解本通知，我在此明确授权并同意按本通知所述收集、使用、持有、披露、及其他对我个人资料的处理（包括敏感个人资料），我同意始终遵守此通知。我同意按照此通知所述在中华人民共和国之外移转我的个人资料（包括敏感个人资料）。

Name/姓名:

Employee/ ID员工编号:

Date/日期:

Issued: March 2022.

发布: 2017年3月