

## Privacy Policy

We, **Enhesa**, its Affiliates and subsidiaries, (“Enhesa”, “we”, “our” or “us”), are an EHS Regulatory Compliance Assurance tool & services provider. Enhesa appreciates your visit and interest in our company, products, and services, and values the importance of protecting your privacy and personal information.

To ensure transparency and security, our Privacy Policy as set forth below will inform you about the category and purpose of the personal information and how we collect, use, and retain such personal information that you provided to us when you use our websites or web-based applications (our “Sites”), use Enhesa products and services, complete related forms, participate in Enhesa events, or communicate with our customer service representatives.

Please note that if your company enlists Enhesa’s services, your company and Enhesa may enter into a separate data processing agreement that will govern the processing of all information and data collected by Enhesa in connection with the service, including some data collected through our Sites. Such an agreement takes precedence over any conflicting provision in this Privacy Policy.

### WHY AND HOW WE COLLECT AND PROCESS YOUR PERSONAL INFORMATION

To provide you with the services that you seek from our Sites, improve our Sites and services, ensure the security of our Sites, and better market relevant content, we may collect and process the personal information that is provided or authorized by you for the following purposes:

- Account and Subscription

Enhesa collects personal information from you when you create your account for the Sites and subscribe for Enhesa’s professional solutions and database. Personal information that we collect includes your username, first and last name, business e-mail address, company/employer name, and title. If you do not provide such information, you may not be able to create an account for the Sites or subscribe for Enhesa’s professional solutions and database.

After you create the account, we may also request that you voluntarily provide other information, such as a phone number, as it relates to our products and services. We use this information to communicate with you, to design content and activities that we believe would be of interest to you.

- Job Application

Enhesa collects personal information if you apply for a job at Enhesa. Personal information that we collect includes names, mobile phone numbers, e-mail addresses, educational background, work experience, and/or other background information relevant to your application. If you do not provide such information, we may not be able to handle your application.

- Events, Conferences and Surveys

We may host events that include in-person and virtual conferences, training, knowledge sharing and webinars. If you register for an event, and you already have an account, we will access the information in your account to provide you with information and services associated with the event. We may also ask for additional information during the registration process. If you register for one of





our events and you do not have an account or are not a member, we will collect your first and last name, business email address, the company you work for or with, and your role/title in that business.

- Communications

If you communicate or correspond with us by email, through postal mail, via telephone or through other forms of communication, including our customer service center, we may collect the information you provide as part of those communications. For example, if you correspond with us through email, we may collect and store the email address you use to send the applicable correspondence and use it to respond to your inquiry; to notify you of Enhesa conferences, publications, or other services; or to keep a record of your complaint, accommodation request, and similar purposes.

## COOKIES

Enhesa may use cookies to keep track of your visit to our Sites. A “cookie” is a small amount of data sent from a server to your browser and stored on your computer’s hard drive. Other tracking technologies work similarly to cookies and place a small amount of data on your devices to monitor your website activity to allow us to collect information about how you use our Sites. With most internet browsers, you can erase cookies from your computer hard drive, block all cookies, or receive a warning before a cookie is stored on your computer. Please refer to your browser instructions which will give you more information. Once you give consent to use cookies, we shall store a cookie on your computer or device to remember this for next time. If you wish to withdraw consent at any time you need to delete our cookies using your web browsers settings. Please be advised that certain sections or functionalities of the Sites may be inaccessible to you if your browser does not accept cookies. We do not currently respond to browser do-not-track signals.

Please refer to our [Cookie Policy](#) for more details regarding our use of Cookies.

## HOW WE SHARE, TRANSFER, AND DISCLOSE YOUR PERSONAL INFORMATION

Enhesa will not share your personal information with third parties except in the following cases for contractual purposes or when we otherwise have obtained your consent for the sharing. Personal information is only shared for legitimate, proper, and necessary purposes.

- Share with Authorized and Certified Service Parties

Enhesa engages selected authorized and certified Service Parties to provide certain services to you, on Enhesa’s behalf. Enhesa will only engage such Service Parties to process your personal information for legitimate, proper, necessary, specific, and clear purposes, and such Service Parties will only access information necessary to perform the service. Enhesa enters into confidentiality agreements obligating these Service Parties to protect and process personal information in compliance with this Privacy Policy as well as any applicable privacy legislation and to apply industry-leading data security measures. Authorized and Certified Service Parties processing personal data may be located outside China. A full list of such authorized vendors can be found [here](#).

- Share with Sub-processors

Some of Enhesa’s solutions are rendered, and some of the databases are maintained by sub-processors. Therefore, we may need to share your personal information from time to time to Enhesa sub-processors who are hosting and operating the websites to an extent necessary for the service.





Sub-processors include Microsoft Inc., Amazon AWS and Accenture. A full list of Enhesa's sub-processors can be found here [Enhesa: Data Processing Agreement | Enhesa](#)

- Share with Enhesa Group Affiliates

In order to allow your account to access services provided across the Enhesa Group, we may, at your request, provide account information to an Enhesa Affiliate in order to secure login credentials. Affiliate means either an entity that owns or controls or is owned or controlled by or is or under common control or ownership with another entity, where control is defined as the possession, directly or indirectly, of the power to direct or cause the direction of the management and policies of an entity, whether through ownership of more than 50% of the shares of voting securities, by contract or otherwise. In other words, these are the Enhesa Group Companies.

- Share with selected Technology Partners

Enhesa continuously adds website-, software- and platform features to improve the services we provide to our customers. To accomplish this, we partner with selected and accredited external Technology Partners that provide technical, marketing, and analytics tools that may use your personal information in an anonymized, aggregated, and encrypted fashion to improve the overall functionality and effectiveness of the Services. Our Technology Partners will only access information necessary to perform the service and Enhesa enters into confidentiality agreements obligating them to protect and process personal information in compliance with this Privacy Policy as well as any applicable privacy legislation and to apply industry-leading data security measures. A full list of our Technology Partners can be found [here](#).

- Disclosure

We may disclose your personal information if required by law, regulation, or other legal subpoena or warrant. We may also disclose your personal information to a regulatory or law enforcement agency if we believe it to be necessary to protect the rights, property, or personal safety of Enhesa, its customers or any third party.

### THIRD PARTY CONTENT

Our Sites may include social media features (e.g., share or like buttons). Such features are provided by third-party social media platforms. Where data is collected this way, its processing is governed by the privacy policy of the respective social media platforms.

Our content may link to third-party websites to provide relevant references. We are not responsible for such third-party content, which may contain separate privacy policies and data processing disclosures.

### YOUR RIGHTS

You may exercise the following rights in respect of your personal information:

- Accessing your personal information;
- Correcting your personal information when you notice any mistake of your personal information;
- Deleting your personal information, if:
  - Enhesa's processing activities violate laws and regulations;





- Enhesa does not obtain your consent for the processing activities and consent was the lawful ground for processing such information;
- Enhesa exceeds the necessary purposes for providing the contracted services during its processing activity;
- Enhesa violates the agreement with you by processing your personal information;
- You have de-registered the account;
- We have ceased to provide service to you;
- Changing the scope of your consent;
- De-registering your account;
- Obtaining a copy of your personal information;
- Asking for a response to your request above.

You may be required to fill in our request form to specify your request to exercise the rights above. Enhesa may decline your request to delete your personal data if the applicable regulations or a competent authority impose the obligation to keep or retain the information as legally required.

## E-MAIL COMMUNICATIONS

If you have given us your e-mail for purposes of communication or promotion, we will use your data to contact you or send promotional e-mails relating to your interests. You may revoke your consent to being contacted by e-mail for promotional purposes any time, by clicking on an unsubscribe link on any of our emails, which also can be found [here](#).

Further, with your consent, we may make use of e-mail tracking technology to obtain data on if you open an e-mail or if you click on links in an e-mail. This data will be used only in automated ways to help improve future marketing messaging and/or to prioritize follow ups based on perceived communications relevance.

Without your consent, we will not make use of personal data unique to you, such as your IP address, your device and browser information, or the time and number of times you open an e-mail or click on a link.

## DATA RETENTION

We will only retain your personal information for the period necessary to achieve the purposes stated in this Privacy Policy unless there is a mandatory retention requirement by laws and regulations.

## TECHNICAL AND ORGANIZATIONAL DATA PROTECTION

Enhesa implements commercially reasonable technical and organizational measures to protect your personal data against abuse and loss. We store such data in secure environments. We provide training to our employees on data protection best practices and require them to enter into a confidentiality agreement.

While we use all reasonable efforts to protect your personal information, we cannot guarantee the absolute security of your data submitted through our Sites.

In the event of an unfortunate personal information security incident, Enhesa will inform you in accordance with applicable laws and regulations (no later than 30 calendar days) of the basic facts and possible impact of the security incident, and the remedial measures we have taken or will take, suggestions for self-prevention and risk reduction, and remedies for you. In addition, the Enhesa IT security team will fully cooperate with your IT security team and provide all necessary information. We will inform you of the event-related situations by email, letter, phone call, or push notification. When it is difficult to inform each user,





we will issue an announcement reasonably and effectively. At the same time, we will also report the handling of personal information security incidents to the regulatory authorities.

## MINORS

The Sites are not designed for or directed at minors 18 years of age or younger, and Enhesa does not intentionally collect or maintain personal data about anyone under this age.

## UPDATES

This Privacy Policy may be updated from time to time. We will not limit your rights under this Privacy Policy without your express consent. We will post any changes to this Privacy Policy on Enhesa's official homepage. For major changes, we will also provide conspicuous notices (e.g., with pop-up prompts).

Major changes include:

- Major changes to our service model, such as the changes to the purpose of processing personal information;
- Major changes to our ownership structure, such as change of control due to bankruptcy and/or merger and acquisition;
- Major changes to the parties with whom we share with or disclose to the personal information;
- Change to the contact information of our Data Protection Officer and complaint channel;
- Personal information protection impact assessment reveals certain high risk.

## CONTACT INFO

Upon request, our Data Protection Officer will provide you with information as to whether and what personal information we store about you. You may contact our Data Protection Officer to exercise your rights stated in this Privacy. Please feel free to direct such requests, or other questions and comments regarding this Privacy Policy or the privacy practices of Enhesa to our Data Protection Officer [dpo@enhesa.com](mailto:dpo@enhesa.com)

***Last Updated: 2024***

