

## Privacy Policy

We, **Enhesa (Shanghai) Co., Ltd.**, (“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 the Enhesa Corporate Web Site or the Enhesa EHS web-based application located at [www.enhesa.com](http://www.enhesa.com) and [www.ehsmonitor.com](http://www.ehsmonitor.com), use Enhesa products and services, complete related forms, participate in Enhesa events, or communicate with our customer service representatives.

Please note that this Privacy Policy does not cover the privacy practices of other Enhesa companies, which are separate legal entities that – depending on where they are located, may be subject to different laws and requirements and governed by different privacy policies than those of Enhesa.

Please also note that if your company enlists Enhesa’s services, your company and Enhesa or our affiliate may enter into a separate 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 subprocessors. 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 Sentia NV. 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. Technology Partners processing personal data may be located outside China. 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.

## INTERNATIONAL DATA TRANSFERS

For contractual purposes or, when required, after obtaining your consent, we may share, transfer or store your personal information outside of China to Enhesa's Sub-processors, Affiliates and external Service and Technology Partners in accordance with the provisions of this Privacy Policy, but we will ensure that the transfer is necessary, that appropriate security measures are taken, and that it complies with applicable Chinese data protection laws. We will take reasonable security measures such as encrypted transmission to protect your personal information. We will conduct any necessary assessments that may be required by





applicable Chinese data protection laws. Prior to transfer, you may be informed of the recipient's name and contact information, the purpose and means of processing, the type of personal data transferred, and the methods and procedures for exercising your rights against the recipient.

### 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 such as WeChat, Weibo, LinkedIn, Twitter, or Facebook. 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, except when laws and regulations provide otherwise;
- Correcting your personal information when you notice any mistake of your personal information processed by Enhesa;
- 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.
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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 for a certain period of time.

### 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 Policy.

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:

**Enhesa (Shanghai) Co., Ltd.**

Address: Room 368, Part 302, No.211, North Fute Road, China (Shanghai) Pilot Free Trade Zone

Email: [dpo@enhesa.com](mailto:dpo@enhesa.com)

***Last Updated: 2024***



## 隐私政策

我们·音和环保咨询(上海)有限公司(以下简称“Enhesa”或“我们”),是EHS合规保障工具及服务的供应商。Enhesa感谢您的访问,并感谢您对我们的公司、产品及服务的兴趣,我们十分注重保护您的隐私和个人信息。

为确保透明和安全,以下隐私政策旨在告知我们收集的个人信息种类和目的,以及我们如何收集、使用和保存您使用Enhesa公司网址或Enhesa EHS网页应用程序(网址为[www.enhesa.com](http://www.enhesa.com)和[www.ehsmonitor.com](http://www.ehsmonitor.com))、使用Enhesa产品和服务、填写相关表格、出席Enhesa活动或与我们的客服代表沟通时所提供的该等个人信息。

请注意本隐私政策不涵盖其他Enhesa公司的隐私实践,其他公司为独立的法律实体,根据其所在地区,可能受与Enhesa公司不同的法律和要求约束,并适用与Enhesa公司不同的隐私政策。

还请注意,如果您的公司聘用Enhesa提供服务,您的公司可以与Enhesa或我们的关联方签订单独的协议,约束Enhesa收集的与服务有关的所有信息和数据(包括通过我们的网站收集的一些数据)的处理行为。该协议优先于本隐私政策中任何与其相冲突的条款。

### 我们收集和您的个人信息的目的和方式

为了向您提供您在本网站上寻求的服务,改善本网站及服务,确保本网站的安全,更好地营销相关内容,我们可能出于以下目的收集和您的个人信息:

- 账户和订阅

当您创建本网站账户以及订阅Enhesa的专业解决方案和数据库时,Enhesa会向您收集个人信息。我们收集的个人信息包括:您的用户名、姓名、公司电子邮件地址、公司/雇主名称和职务。如果您不提供这些信息,您可能无法创建本网站账户或订阅Enhesa的专业解决方案和数据库。

在您创建账户后,我们可能会要求您主动提供其他与我们的产品和服务相关的信息,例如电话号码。我们使用这些信息与您沟通,设计我们认为您会感兴趣的内容和活动。

- 工作申请

如果您申请Enhesa的工作,Enhesa会收集您的个人信息。我们收集的个人信息包括:姓名、手机号码、电子邮件地址、教育背景、工作经验和/或其他与您的申请相关的背景信息。如果您不提供这些信息,我们可能无法处理您的申请。

- 活动、会议和调查

我们可能举办的活动包括:现场和线上会议、培训、知识分享和网络研讨会。如果您注册了某个活动,并且已经拥有账户,我们将获取您账户中的信息,为您提供与该活动相关的信息和服务。在注册过程中,我们可能会要求您提供其他信息。如果您注册了我们的某项活动,但您没有账户或不是我们的会员,我们将收集您的名字和姓氏、公司电子邮件地址、您工作的公司或所属的公司,以及您在该业务中的角色/职务。

- 通信

通信。如果您通过电子邮件、邮寄、电话或其他通信形式,包括我们的客服中心,与我们联系或通信,我们可能会收集您提供的信息作为通信的一部分。例如,如果您通过电子邮件与我们联系,我



们可能会收集并存储您用于发送相关通信的电子邮件地址，并使用该电子邮件地址答复您的询问；通知您关于Enhesa的会议、出版物或其他服务；或保存您的投诉、住宿请求和类似目的的记录。

## COOKIES

Enhesa可能会使用本网站上的cookies跟踪您对我们网站的访问。“cookies”是从服务器发送到您的浏览器并存储在计算机硬盘上的少量数据。其他跟踪技术的工作原理与cookies类似，在您的设备上放置少量数据以监控您的网站活动，使我们能够收集有关您如何使用我们的网站的信息。使用大多数互联网浏览器，您可以从计算机硬盘上删除cookies，阻止所有cookies，或在cookies存储在您的计算机上之前收到警告。请参阅您的浏览器说明，它将为您提供更多信息。一旦您同意使用cookies，我们将在您的计算机或设备上存储一个cookies，以备下次使用。如果您希望在任何时候撤回同意，您将需要使用您的浏览器设置删除我们的cookies。请注意，如果您的浏览器不接受cookies，您可能无法访问本网站的某些部分或功能。我们目前不对浏览器“禁止跟踪”信号作出回应。

请参阅我们的[Cookie政策](#)，以了解关于我们使用cookies的更多细节。

## 我们如何共享、转让和披露您的个人信息

除非在下列情形中为了实现合同目的或者我们另行获得您的同意的情形，Enhesa不会与第三方分享您的个人信息。个人信息仅用于合法、适当和必要的目的。

- 与经授权和认证的服务商共享

Enhesa聘请某些经授权与认证的服务商为您提供特定服务。Enhesa将仅为合法、适当、必要、具体和明确的目的而聘请这些服务商处理您的信息，并且这些服务商只会访问提供服务所需的信息。

Enhesa将与该等服务商签署保密协议，要求其根据本隐私政策和任何可适用的隐私法规来保护和处理您的个人信息，并采取行业领先的数据安全措施。处理个人信息的经授权与认证的服务商可能位于中国境外。这些经授权的供应商的完整名单可以在[这里](#)找到。

- 与子处理者共享

Enhesa的部分解决方案是由子处理者提供的，且部分数据库也由子处理者维护。因此，我们可能需要不时向Enhesa的子处理者分享您的个人信息，以在服务所需的范围内进行托管和运营网站。该等子处理者包括微软公司和Sentia NV。您可以在[Enhesa: 数据处理协议 | Enhesa](#)中找到Enhesa的所有子处理者的完整名单。

- 与Enhesa集团关联方共享

为了允许您的账户访问Enhesa集团提供的服务，根据您的请求，我们可能会向Enhesa关联公司提供您的账户信息，以确保登录验证信息的安全。“关联公司”是指拥有或控制或被拥有或控制或与另一实体有共同控制或所有权的实体，其中“控制”被定义为直接或间接拥有指导或导致指导实体管理和政策的权力，无论是通过拥有超过50%的具有投票权的股份，还是通过协议或其他方式。换句话说，即指所有的Enhesa集团公司。

- 与特定技术合作伙伴共享

Enhesa致力于通过添加网站、软件和平台功能以完善向客户提供的服务。为了实现这一目标，我们与经过选择和认可的外部技术合作伙伴合作，由他们提供技术、营销和分析工具；该技术合作伙伴可能会以匿名化、汇总化和加密的方式使用您的个人信息，以帮助改善Enhesa服务的整体功能和





效果。我们的技术合作伙伴只会访问履行服务所需的信息，且Enhesa将与其签订保密协议，要求他们根据本隐私政策及任何可适用的隐私法规保护和处理个人信息，并采取行业领先的数据安全措施。这些处理个人信息的技术合作伙伴可能位于中国境外。您可以在[此处](#)找到Enhesa技术合作伙伴的完整名单。

- **披露**

如果法律法规或其他法律传票或命令提出要求，我们可能会披露您的个人信息。如果我们认为出于保护Enhesa、其客户或任何第三方的权利、财产或人身安全所必需，我们也可能向监管机构或执法机构披露您的个人信息。

### **国际数据传输**

为了实现合同的目的或者当必要时，在获得您的同意后，我们可能会根据本隐私政策的规定向Enhesa的子处理者、关联方、外部服务商和外部技术合作伙伴在中国境外共享、传输或存储您的个人信息，但我们将确保该传输是必要的、并采取适当的安全措施且符合适用的中国数据保护法律。我们将采取合理的安全措施（如加密传输）来保护您的个人信息。我们将进行适用的中国数据保护法律可能要求的任何必要的评估。在传输之前，我们将告知您接收者的姓名和联系方式、处理目的和方式、传输的个人信息类型以及您对接收者行使权利的方式和程序。

### **第三方内容**

我们的网站可能包含社交媒体功能（如分享或点赞按钮）。该等功能由第三方社交媒体平台（如[微信、微博、LinkedIn、Twitter或Facebook]）提供。通过该等方式收集的数据，其处理受各社交媒体平台的隐私政策约束。

我们的内容可能会链接到第三方网站以提供相关参考。我们对该等第三方内容不承担责任，该等第三方内容可能包含单独的隐私政策和数据处理披露。

### **您的权利**

您可以就您的个人信息行使如下权利：

- 访问您的个人信息，法律法规另有规定的除外；
- 当您发现Enhesa处理您的个人信息有任何错误时，纠正您的个人信息；
- 在以下情况下删除您的个人信息：
  - Enhesa的处理活动违反法律法规；
  - Enhesa的处理活动未获得您的同意，且该同意是处理信息的合法理由；
  - Enhesa在其处理活动中超出了提供合同服务的必要目的；
  - Enhesa处理您的个人信息违反与您达成的协议；
  - 您已注销账户；
  - 我们已停止向您提供服务；
- 更改您的同意范围；
- 注销您的账户；
- 获得您的个人信息副本；
- 请求对您的上述请求作出答复。

为了行使上述权利，您可能需要填写我们的请求表格以详细说明您的请求。

### **电子邮件通讯**

如您为通讯或推广之目的向我们提供电子邮件，我们将使用您的数据与您联系或发送与您感兴趣的推广电子邮件。您可以随时通过点击我们任何电子邮件上的退订链接（您也可以在[此处](#)找到），取消您关于接受推广型电子邮件的同意。

此外，在您同意的情况下，我们可使用电子邮件跟踪技术获取您打开电子邮件或您点击电子邮件中的链接时的数据。该等数据仅会以自动方式使用，以帮助改进未来的营销信息和/或根据感知的通信相关性确定跟进的优先顺序。未经您的同意，我们不会使用您独有的个人数据，如您的IP地址、您的设备和浏览器信息或您打开电子邮件或点击链接的时间和次数。

### **数据保留**

我们只会为为实现本隐私政策所述目的所必要的期限内保留您的个人信息，法律法规有强制性的保留要求的除外。

### **技术和组织数据保护**

Enhesa会采取商业上合理的技术和组织措施保护您的个人数据不被滥用和丢失。我们会在安全的环境中存储该等数据。我们向员工提供数据保护最佳实践的培训并要求他们签署保密协议。

我们正在尽一切努力保护您的个人信息，但不能保证您通过本网站提交的数据的绝对保证。

如果不幸发生个人信息安全事件，Enhesa将根据适用法律法规的要求（在30个日历日内）通知您：安全事件的基本事实、可能造成的影响，以及我们已经采取或将要采取的补救措施、自我防范和降低风险的建议、您可以获得的救济。此外，Enhesa信息技术安全团队将全力配合您的信息技术安全团队，并向您提供一切必要的信息。我们将以电子邮件、信函、电话、或推送通知方式及时向您通报事件相关情况。当难以通知到每一位用户时，我们将以合理、有效的方式发布公告。同时，我们也将向有关主管机关汇报个人信息安全事件的处理情况。

### **未成年人**

本网站并非针对18岁以下的未成年人设计，亦不面向18岁以下的未成年人，Enhesa也不会有意收集或保存未满18岁的未成年人的个人信息。

### **更新**

本隐私政策可能会不时进行更新。未经您的明确同意，我们不会限制您在本隐私政策项下所享有的权利。本隐私政策的任何变更，我们将在Enhesa的官方主页上公布。对于较大的变更，我们也将提供显眼的提示（如弹出式提示）。

较大的变更包括：

- 我们服务模式的重大变更，如处理个人信息的目的变更；
- 我们所有权结构的重大变更，如因破产及/或并购导致的控制权变更；
- 我们与其共享或披露个人信息的主体发生重大变更；
- 我们的数据保护专员的联系方式和投诉渠道的变更；
- 个人信息保护影响评估显示存在某种高风险。

### **联系方式**



根据您的要求，我们的数据保护专员将向您提供我们是否存储了与您相关的个人信息以及个人信息的内容。您可以联系我们的数据保护专员以行使您在本隐私政策中所享有的权利。

请将该等要求或其他关于本隐私政策或Enhesa隐私实践的问题或意见发送给我们的数据保护专员：

**音和环保咨询（上海）有限公司**

电子邮件：[dpo@enhesa.com](mailto:dpo@enhesa.com)

**最后更新：2024年**

