

## Personal Information Protection Policy

The effective date of this Personal Information Protection Policy (the “**Policy**”): June 10th, 2024.

The purpose of this Policy is to regulate the collection, storage, use, processing, transmission, provision, disclosure and deletion of personal information by Heidelberger Druckmaschinen AG (the “**Company**” or “**we**”) through its Chinese website (www.heidelberg.com/cn). Unless otherwise specified, this Policy does not apply to any other official website, webpage or other application of the Company other than this Chinese website. Please note that with regard to the website for the official Heidelberg e-shop (heidelbergchina.com.cn) and its application, a separate Heidelberg E-shop Service Agreement and Privacy Policy shall apply. **Important provisions regarding your rights and interests in personal information have been highlighted in bold for your special attention.**

This Policy will help you understand the following:

- Who is the handler of personal information
- How we collect and use your personal information
- Use of Cookies
- How long we keep your personal information
- How we engage other entities to process, share, transfer or disclose your personal information
- How your personal information is transferred globally
- How we protect your personal information
- Your rights
- How we handle children’s personal information
- How this Policy will be updated

### 1. Who is the handler of personal information

The handler of personal information is: Heidelberger Druckmaschinen AG.

Address: Kurfuersten-Anlage 52-60, 69115 Heidelberg, Germany

Contact email for protection of personal information:  
datenschutzbeauftragter@heidelberg.com

## **2. How we collect and use your personal information**

### **2.1 Personal Information we collect**

2.1.1 When you access our website, you transmit (for technical reasons) data via your Internet browser to our web server. The following data is recorded for communication purposes between your Internet browser and our web server while a connection is established:

- Date and time of visit/request
- Name of web pages used/requested file
- Page from which the website/file was requested
- Access status (website/file transferred, website/file not found, etc.)
- Internet browser and operating system used
- Full IP address of the requesting computer
- Transmitted quantity of data
- Source from which you are visiting us

For technical security reasons, in particular as a defense against attempted attacks on our web server, this data is temporarily stored by us. It is not possible for us to trace the data back to a specific person. Due to our legitimate interest in security and troubleshooting, we store the data and protocols for a maximum of seven days from the end of processing, pursuant to the applicable laws and regulations on data protection. After this, the data will be anonymized by truncating the IP address at domain level, which makes it no longer possible to establish a link to the individual user. The data is also processed in anonymized form for statistical purposes. It is neither in part nor in full matched against other databases or disclosed to third parties.

2.1.2 If you need to seek business cooperation or have other questions and requests, you can click on the “Contact” icon in the lower right corner of the page, and fill out the online form to contact us. In this contact form, we collect your names, title, company name, company email address, phone number, country, city and any other information and content that you voluntarily provide. You can only submit the form after accepting this Policy and clicking the “Submit” button, which also serves as your express consent to provide the Company with your personal information as described above. If you contact us directly through the Company’s contact information on the website, anything you voluntarily provide over the phone or by email will be deemed to be your express consent to the Company’s collection and processing of your relevant personal information. Please ensure that any attachment you voluntarily provide does not contain any sensitive personal information of yours, nor any personal information or sensitive personal information of others. Our collection of the above personal information is required to process or respond to your request. You may provide only part of your personal information, but if the information you fill in is incomplete, it may affect our ability to provide you with the service or response. If you refuse to provide the above

information at all, we will not be able to receive and process your request, which, however, will not affect your access to the Website.

## **2.2 How we use your personal information**

Generally, we will only use the personal information we collect from you for the purposes described in this Policy or for the purposes we explain to you at the time we collect your personal information. The details are set out below:

- To provide our website and apps;
- To carry out activities connected to a contract we have with you or the entity you work for as well as carrying out activities connected to pre-contractual measures in this respect, for example in the event of inquiries regarding our products or services;
- To communicate with you regarding inquiries you have that are not connected to a contract;
- To be able to provide you with direct marketing communication regarding the services and products we offer (including by means of our newsletter)
- To provide our existing customers with information and offerings that we believe match your interests as they are similar to your previous purchases;
- To constantly improve the services we offer you, based on an analysis of usage data collected on our website/apps on a pseudonymized basis as well as the evaluation of the availability and speed of our website;
- To analyze usage data collected on our website/apps for interest-based advertising;
- To carry out market research activities based on information that relates to our existing customers/their representatives (name and e-mail address that we have received in connection with our business relationship);
- To monitor and improve the use of and contentment with our products and services by carrying out surveys;
- To determine disruptions and to ensure the security of our systems, including the detection and tracing of (the attempt of) unauthorized access to our web servers;
- To comply with legal obligations that are applicable to us (e.g. tax obligations or data retention obligations);
- To safeguard and defend our rights.

### 3. Use of Cookies

We use Cookies and similar technologies (together “Cookies”) as well as social media plug-ins for our website/apps. These enable us to make visiting our website more attractive, prevent cases of misuse. Exactly which procedures are involved and how your data is used for this purpose is explained in the sections below that deal with the respective services in use.

Cookies are small text files that are automatically created by your browser and stored on your terminal device (laptop, tablet, smartphone, etc.) when you visit our website. Information in connection with the specific terminal device used is stored in the Cookie, however this does not mean that we can obtain direct knowledge of your identity as a result.

The Cookies can be categorized as follows:

- **Essential Cookies:** These technologies are required to activate the core functionality of the website and to achieve the objective of the website. These Cookies are necessary for technical reasons so that you can visit our website and use the respective functions.
- **Functional Cookies:** Functional Cookies are used to operate the site and enable convenient handling as part of the user experience.
- **Marketing & Statistic Cookies:** Marketing, analysis and targeting Cookies are typically used to improve the service on our web pages or to show you advertisements that match your interests.

You may withdraw your consent to Cookies and to the processing of your data based on your consent at any time with effect for the future. You may also object to the processing of your personal information which we collect in the context of Cookie usage to the extent we rely on our legitimate interest for the processing of such data. You can adjust your Cookie settings and exercise these rights by moving your mouse over [here](#).

#### 3.1 Essential Cookies

##### 3.1.1 ClickDimensions and newsletters

If you download images or click on a link in a Heidelberger Druckmaschinen AG newsletter or in one of our other marketing e-mails, this is automatically logged by ClickDimensions via an e-mail tracking service. The usage information generated will be stored on our server in Germany and used for statistical usage analysis. We also use the opportunity to check whether you have opened the e-mail and which links you have clicked. Forwarded messages are tracked in the same way. The results help us to measure the success and reach of our newsletters and e-mails, as well as to continuously

improve the content of our newsletters and make the information offered on our web pages more interesting for you.

ClickDimensions never stores information in the LSO section of your computer, i.e. we never use “flash Cookies” (local shared objects, LSO for short). ClickDimensions does not use any visitor identification technology that involves sharing information that you provide with other websites.

The following data is processed:

- IP address
- Contact information you share with us for the services you provide to us
- Opening of the e-mail or newsletter
- Content interactions such as image downloads or clicks on links
- Browser information
- Usage data
- Date and time of your visit
- Pages viewed
- Device information
- Demographic information

In the course of this, your data may also be processed in third countries. To ensure an adequate level of data protection, the overseas recipient has concluded a contract with the service provider containing standard contractual clauses.

If you have given your consent, we use a scoring procedure to calculate probability values according to a scientifically recognized mathematical-statistical method that is intended to help justify a possible contractual relationship with a company. This data helps with decision-making in the context of product deals, for example, and is incorporated into our risk management. We do not process any information relating to sensitive personal information.

If you do not agree with the storage and analysis of this data, you can unsubscribe from the respective newsletter by clicking on the following link, from the marketing e-mails: click [here](#):

You can find an overview of the Cookie set by ClickDimensions, including the retention period, below:

Name: cuvid

Provider: ClickDimension

Description: This Cookie is typically written to the browser upon the first visit to the site from that web browser. If the Cookie is deleted by the browser operator and the browser then visits the page, a new \_cuvid Cookie is written. This Cookie is used to identify unique visitors to the site and is updated with each page view. Additionally, this Cookie is provided with a unique ID that the application uses to ensure both the validity and accessibility of the Cookie as an extra security measure.

Expiration: 2 years after setting/updating

Name: cusid

Provider: ClickDimension

Description: This Cookie is used to establish and continue a user session with the site. When a user views a page on the site, the script code attempts to update this Cookie. If the Cookie is not found, a new one is written and a new session established. Each time a user visits another page of the site, this Cookie is updated to expire in 30 minutes. This way, a single session will continue as long as the user activity is continued within 30 minutes. This Cookie expires when a user pauses on a page of the website for more than 30 minutes.

Expiration: 30 mins after setting/updating

Name: cuvon

Provider: ClickDimension

Description: Is used to indicate when a visitor has last viewed a page.

Expiration: 30 mins after setting/updating

Name: cs\_optout\_accountkey

Provider: ClickDimension

Description: "accountkey" in the Cookie name is a placeholder. This text would correspond to your specific account key. This Cookie is generated when a visitor disables tracking. As long as it is in place, no web tracking data is generated for this visitor.

Expiration: 6 months after setting/updating

### 3.1.2 Google Tag Manager

We use Google Tag Manager. The provider of the Google Tag Manager component is Alphabet Inc., 1600 AMPHITHEATRE PARKWAY MOUNTAIN VIEW CA 94043. This service enables website tags to be managed via an API. Google Tag Manager only implements tags. This means that Cookies are not used and no personal information is collected. Google Tag Manager triggers other tags that can be used to collect data, however, Google Tag Manager does not access this data. If deactivated at the domain or Cookie level, all tracking tags implemented using Google Tag Manager will remain deactivated.

### 3.1.3 Zoovu (only in PANTONE® Manager)

This is a conversation search platform and a configurator. We use Zoovu for our PANTONE® Manager, where customers can search for a color that meets their requirements.

The following data is processed by Zoovu:

- Click on the answer (selected color)
- Customer ID
- User identification
- Time stamp
- IP address

- Usage and behavioral data (such as retrieving a color or using the search function)
- Events (like buying or retrieving a color)

To opt out of the data processing, click [here](#).

#### 3.1.4 Podigee (only for podcasts)

To provide you with podcasts, we use the podcast hosting service of our data processor Podigee GmbH, Schlesische Straße 20, 10997 Berlin, Germany (“Podigee”). The podcasts are loaded by Podigee or transmitted via Podigee, so when you access a podcast integrated in our web pages, data is transmitted to our service provider.

Podigee processes IP addresses and device information to enable podcasts to be downloaded/played and to determine statistical data, such as download numbers. This data is anonymized or pseudonymized before being stored in Podigee’s database unless it is required for the provision of the podcasts. Data that is required for provision of the podcasts will be deleted no later than seven days after this provision if it is not required for billing purposes.

Click [here](#) to see Podigee’s privacy policy.

#### 3.1.5 reCAPTCHA

This service (e.g. for contact forms, and newsletter registrations) is used for purposes of identification and to prevent the services provided from being misused by machines. “Captchas” are generated and verified on application servers from Heidelberger Druckmaschinen AG. No data is transmitted to third parties in the process.

Data processed:

- IP address
- Click path
- Time spent on the site
- Website visitor behavior
- Browser language
- User input
- Javascript objects
- Browser plug-ins

The privacy policy of the data processor can be found [here](#).

You can find an overview of the Cookies set by reCAPTCHA, including the retention period, below:|

Name: \_greaptcha

Provider: Google reCAPTCHA

Description: is used to provide spam protection

Expiration: session Cookie

## 3.2 Functional Cookies

### 3.2.1 Akamai

To optimize the loading times of our website and our online e-shop application, we use a so-called content delivery network (CDN) offered by Akamai Technologies, Inc., 145 Broadway, Cambridge, MA 02142, USA (“Akamai”).

Akamai is a content delivery and cloud infrastructure service provider that coordinates and optimizes the load balancing of web content for online applications. We use Akamai services to speed up our websites so that they can provide an acceptable response time worldwide.

Data processed:

- IP address
- Browser information
- Operating system
- Pages visited
- Date and time of your visit

To opt out of the data processing, click [here](#).

Information on the privacy policy of Akamai Technologies, Inc. can be found [here](#). The company’s data protection officer can be contacted directly at the following e-mail address: [privacypolicy@akamai.com](mailto:privacypolicy@akamai.com).

### 3.2.2 Pardot

#### **Pardot as the service provider used for newsletter distribution**

On behalf of the users consent, we use the Pardot Marketing Automation System (“Pardot MAS”) to send newsletters, emails and electronic notifications. The provider is Pardot LLC, 950 E. Paces Ferry Rd. Suite 3300 Atlanta, GA 30326, USA (“Pardot”), by Salesforce.com EMEA Limited (Salesforce), village 9, floor 26 Salesforce Tower, 110 Bishopsgate, London, UK, EC2N 4AY.

#### **Statistical survey and analyses**

The newsletters contain a so-called “web beacon”, i.e. a pixel-sized file that is retrieved from the Pardot server when the newsletter is opened. As part of this retrieval, technical information, such as information about the browser and your system, as well as your IP address and time of retrieval are collected. This information is used for the technical improvement of the services based on the technical data or the target groups and their



reading behavior based on their retrieval locations (which can be determined with the help of the IP address) or the access times.

### **Online call and data management**

There are cases where we direct newsletter recipients to Pardot's websites. E.g. our newsletters contain a link with which the newsletter recipients can retrieve the newsletters online (e.g. in case of display problems in the e-mail program). Furthermore, newsletter recipients can subsequently correct their data, such as the e-mail address. Likewise, Pardot's privacy policy is only available on their site.

#### **Data processed:**

- IP address
- Contact information you have provided to us for the provision of our services
- Open the e-mail or newsletter
- Interactions with content such as downloading images or clicking on links
- Browser information
- Usage data
- Date and time of your visit
- Pages viewed
- Device information

When using Pardot, a data transfer to the USA cannot be ruled out. We and our foreign recipients have fulfilled the corresponding protection obligations for data transfers in accordance with the provisions of the applicable data protection laws and regulations to ensure that the third countries provide the same level of data protection.

Pardot uses this information to send and evaluate the newsletter on our behalf. For more information on data protection at Pardot, please visit: [www.salesforce.com/company/privacy/](http://www.salesforce.com/company/privacy/).

In this context, we would like to point out that Cookies are used on Pardot's websites and that personal information is processed by Pardot, its partners and service providers (e.g. Google Analytics). We have no influence on this data collection. For more information on data protection at Pardot, please visit: [www.salesforce.com/company/privacy/](http://www.salesforce.com/company/privacy/).

## **3.3 Marketing & Statistic Cookies**

### **3.3.1 Google Analytics**

We use Google Analytics, a web analysis service provided by Google Ireland Ltd. ("Google") for the purpose of designing our pages to meet your needs and continuously optimizing them. This use is on the basis of your consent. Google Analytics uses Cookies, which enable an analysis to be performed of your use of our websites and online services. In this connection, our commissioned processor Google creates pseudonymized user profiles and uses Cookies.

Data processed:

- Browser type/version
- Operating system used
- Referral URL (the page that directed you to our website)
- Host name of the accessing terminal device (IP address, advertisement ID)
- Time of the server request

Google Analytics is only used by us in conjunction with activated IP anonymization (IP masking). The IP address anonymization method used by Google does not write IP addresses to a disk, as anonymization takes place in the main memory immediately after the request is received. We do not receive any personal information from Google, only anonymized statistics.

On behalf of the operator of this website, Google will use this information to analyze your use of the website, compile reports on website activities, and provide further services to the website operator in relation to the website use and Internet use. The IP address transmitted by your browser through Google Analytics is not merged with other Google data. You may refuse the use of Cookies by selecting the appropriate settings in our consent management platform (which you can access by moving your mouse over [here](#)) or on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website.

Google's contact details are:

Google Ireland Limited  
Gordon House, Barrow Street  
Dublin 4  
Ireland  
Tel: +353 1 543 1000  
Fax: +353 1 686 5660  
Email: support-deutschland@google.com

### **Google's Privacy Policy**

We store the data collected by Google Analytics in pseudonymized profiles that cannot be associated with any individual person for a period of 26 months to prevent cases of abuse and to optimize our web pages. This data is automatically deleted after 26 months. Move your mouse over [here](#) to opt out on all domains of the processing company or to download the browser add-on to deactivate Google Analytics.

You can find an overview of the Cookies set in connection with Google Analytics, including the storage period, below:

Name: `_ga`, `_gat`

Provider: Google Universal Analytics

Description: `_ga` is used to distinguish individual users by means of designation of a randomly generated number as client identifier (based on browser and device), which allows calculation of visits and sessions; `_gat` is used to distinguish between the different monitoring objects created in the session.

Expiration: `_ga`: two years from settings, update or until you delete Cookies from your browser; `_gat`: 20 minutes from settings or update.

Name: Source

Provider: Google Universal Analytics

Description: Captures the origin from where a user came on our pages.

Expiration: 1 year from settings or update

### 3.3.2 Google Analytics Advertising Features

With your consent, we use Google Analytics advertising features on our website. This enables us to display personal offers to you, including outside the websites hosted by Heidelberger Druckmaschinen AG.

Data processed:

- Pages visited
- IP address
- Duration of the visit
- Other information on the use of websites
- Content, in which users are interested

By linking your pseudonymous usage data collected through Google's DoubleClick Advertising Network, we can analyze the demographic composition of our website visitors and impact on our users' interests. This helps us to present you with better and above all more relevant advertising.

You can revoke your consent at any time with future effect by selecting the appropriate settings in our consent management platform (which you can access by moving your mouse over [here](#)) or by accessing the following link: [More information and opt-out](#).

## 4. How long we keep your personal information

Your personal information will be processed and stored for such period as necessary to carry out the purposes for which it has been collected, subject to the retention period required by the applicable laws or, where applicable, until such time as you withdraw your consent to the processing of personal information. At the end of such period, and when there is no longer any legal or commercial purpose for storing your personal information, the personal information will be automatically and permanently erased or anonymized.

Specifically, the retention periods of the personal information collected on the Website by the Company in relation to Sections 2 and 3 of this Policy are as follows:

- For the personal information in log files collected under Section 2.1.1 and Section 3 of this Policy, please refer to the relevant sections for their respective storage

periods. Personal information independently processed by a third party will be retained for the period specified in the third party's personal information protection policy.

- Personal information collected under Section 2.1.2 of this Policy will be deleted at the latest after three years from the end of the conversation or when the issue has been finally clarified.

## **5. How we engage other entities to process, share, transfer or disclose your personal information**

The Company will take adequate precautions, subject to the applicable laws, to ensure the security of your personal information. The Company will not provide, sell, rent, share or trade your personal information with any third party, unless it is required to do so to provide you the products and services, or we have obtained your consent, or it is in compliance with other laws to do so.

We may engage service providers to perform certain functions and provide certain products and services on our behalf (processing upon entrustment). We will enter into agreements with such service providers to protect your personal information, and these agreements specify all reasonable measures that should be in place at the contractual, legal, technical and organizational levels to ensure that the service providers provide adequate protection for the processing of your personal information and comply with applicable laws.

## **6. How your personal information is transferred globally**

**The server of this website is located in Germany, and personal information provided by visitors to this website from the PRC will, in principle, be stored directly in Germany.**

**As the server of this website is located in Germany, this means that, subject to your consent, your personal information (as detailed in Sections 2 and 3 hereof) will be stored directly on the German server controlled by Heidelberger Druckmaschinen AG. If you refuse to consent to such cross-border transfer of personal information as described above, you will not be able to continue browsing this website.**

**You may exercise all of your rights with respect to personal information under Section 8 of this Policy by contacting Heidelberger Druckmaschinen AG using the contact information set forth in Section 1. We carry out such cross-border transfer of personal information as is necessary for the setup of our server and only for fulfilling the relevant contractual obligations and legal requirements, or if you have provided your separate consent. We will comply with the requirements of the relevant laws and regulations, perform personal information protection impact assessments in accordance with the law prior to cross-border transfers, enter into**

**standard contracts and file them in accordance with the laws, and anonymize or de-identify personal information to the greatest extent possible in order to protect the security of your personal information.**

**In accordance with the requirements of the PRC data protection laws and regulations, the Company hereby solicits your separate consent for the cross-border transfer of personal information, and you will act as a third party beneficiary if, in accordance with the requirements of the PRC data protection laws and regulations, the Company enters into a standard contract in such format as formulated by the PRC cyberspace administration authority. If you do not explicitly refuse within 30 days following the date of the contract, you will become entitled to the rights of the third-party beneficiary under such standard contract.**

## **7. How we protect your personal information**

The Company uses technical and organizational security measures to protect the personal information we collect from you against accidental or intentional alteration, loss, destruction or access by unauthorized persons. Our security measures will be continually improving in line with technological developments.

The Internet environment is not 100% secure and we will endeavor to ensure or warrant the security of any information you send us. If any breach of our physical, technical or administrative safeguards results in unauthorized access to, public disclosure of, alteration of or destruction of information, resulting in damage to your legal rights and interests, we will be held legally liable accordingly.

In the event of a personal information security incident, we will immediately notify you in accordance with the requirements of laws and regulations, including the basic information of this security incident and its possible impact, including the response measures we have taken or will take, our advice to you on the measures you may take to prevent and mitigate the risks, as well as remediation actions. We will promptly notify you by email, phone, SMS text message and other means. If it is difficult to provide individual notification to certain specific subjects of personnel information, we will use reasonable and effective means to publish public announcements. At the same time, we will use a proactive approach to report on the handling of information security incidents as required by local regulatory authorities.

## **8. Your rights**

In accordance with the applicable laws, regulations and standards of the PRC, as well as the prevailing practices in other countries and regions, we protect your right to exercise the following rights with respect to your personal information:

- Access your personal information. You have the right to access your own personal information, subject to the exceptions provided by laws and regulations.

- Correct and supplement your personal information. When you discover an error in the personal information about you which is processed by us, you have the right to request us to make corrections or supplementations.
- Delete your personal information. You may request us to delete your personal information when the reason why we need and process your information no longer exists, or when we are no longer legally permitted to process such information. If we decide to respond to your request for deletion, we will also at the same time notify the entities which have obtained your personal information from us and request them to timely delete your personal information, unless otherwise required by laws or regulations, or unless those entities have obtained your separate authorization. When you delete your information from our service, we may not immediately delete the corresponding information in our backup system, but will do so when updating the backup.
- Change the scope of your authorization and consent. Each business function requires some basic personal information to accomplish. You may give or withdraw at any time your authorization and consent for the collection and use of additional personal information. Upon your withdrawal of your consent, we will no longer process the corresponding personal information. However, your decision to withdraw your consent will not affect the processing of your personal information previously carried out based on your authorization.
- Deregister your account. Currently, this Website does not have the function to register an account. If the account registration and management functions become available in the future, we will update the way to deregister the accounts and you may request to deregister your account at any time. After deregistration of your account, we will cease to provide you with products or services and delete your personal information upon your request, except as otherwise provided by laws or regulations.
- Obtain a copy of your personal information. Where technically feasible, we may also transfer a copy of your personal information directly to a third party designated by you upon your request if the data interface has been matched.
- Restrain the information systems from automated decision-making. At present, this Website does not use personal information for automated decision-making, and you may reject automated decision-making at any time and choose the option of not to target your personal characteristics if such decision-making function is adopted in the future. You have the right to request an explanation from the Company if a decision made through automated decision-making significantly affects your rights and interests, and you have the right to refuse the Company to make decisions only through automated decision-making.

- You have the right to ask us to explain to you how we process your personal information as well as this Personal Information Protection Policy if you do not really understand the contents of this Personal Information Protection Policy.
- You have the right to complain to the personal information protection and regulation authority about our collection or use of your personal information. You may contact the Cyberspace Administration of China or its local office at any time.

If you wish to exercise any of the abovementioned rights with respect to your personal information, please send an email to: [datenschutzbeauftragter@heidelberg.com](mailto:datenschutzbeauftragter@heidelberg.com).

For security purposes, you may need to provide a written request or otherwise prove your identity. We may ask you to verify your identity before processing your request. Generally, we will reply within fifteen working days.

In principle, we do not charge for your reasonable requests, but we will, as appropriate, charge a cost fee for multiple repetitive requests beyond reasonable limits. We may refuse the requests that are unnecessarily repetitive, require excessive technical means (for example, requiring the development of a new system or a fundamental change in the current practice), pose a risk to the legal rights and interests of others, or are highly impractical (for example, involving the backup of information stored on disks).

We will not be able to respond to your request in the following circumstances:

- the circumstances which are related to the fulfilment of the obligations under laws and regulations by the controller of the personal information;
- the circumstances which are directly related to national security and national defense security;
- the circumstances which are directly related to public security, public health and major public interests;
- the circumstances which are directly related to criminal investigation, prosecution, trial and judgment enforcement;
- the circumstances in which the controller of the personal information has sufficient evidence to prove that the personal information subjects have subjective malice or have abused their rights;
- the circumstances in which the significant legitimate rights and interests of a personal information subject or other individuals, such as life or property, are to be safeguarded, but the consent of such subject is difficult to be obtained;

- the circumstances in which responding to the request from a personal information subject would result in serious damage to the legitimate rights and interests of such subject or other individuals or organizations;
- the circumstances which involve trade secrets.

## **9. How we process children's personal information**

Our Website is primarily intended for adults. Where a child's personal information is collected with parental consent, we will only use or publicly disclose such information as permitted by laws, with the express consent of the parent or guardian, or as necessary to protect the child.

Despite different definitions of a child under local laws and customs, we consider anyone under 14 years old as a child.

If we find that we have collected a child's personal information without prior proven consent of the parents, we will try to delete the relevant personal information as soon as possible.

## **10. How this Policy will be updated**

This Policy is subject to change as the functionality of the Website changes. We will not reduce your rights under this Policy without your express consent. We will post any changes we make to this Policy on this page. When we post a revised Policy on this Website, you will need to read the updated Policy and give your express consent again.

We will also keep an older version of this Policy on file for your review.