**MytePro Project Privacy Policy Statement**

**MytePro 項目隱私政策****聲明**

Updated on: [28/04/2025]

更新日期：[2025年4月28日]

Effective date: [28/04/2025]

生效日期：[2025年4月28日]

Dear User:

尊敬的用戶：

The Ming Yuan Cloud group, being Ming Yuan Cloud Group Holdings Limited and its subsidiaries, affiliates and associated companies, including the MytePro entities and their Affiliates as specified in the appendices (hereinafter collectively referred to as “**we**”, “**us**”, “**our**” or “**MytePro**”) place particular importance on the protection of customers Personal Data and privacy rights and are committed to complying with all applicable laws and regulations concerning Personal Data privacy protection. Therefore, we have formulated this " *MytePro Project Privacy Policy Statement*" (hereinafter referred to as "**this Privacy Policy**") that covers the way we collect, store, use, disclose, share and protect customer information.

明源雲集團，即明源雲集團控股有限公司及其附屬公司、關聯方和有聯繫公司，包括附錄中所列MytePro實體及其關聯方（以下統稱“**我們**”或“**MytePro**”）非常重視客戶個人資料及隱私權的保護，並承諾遵守所有適用的保障個人資料私隱的法律法規。因此我們制訂了此《MytePro 項目隱私政策聲明》（以下簡稱“**本隱私政策**”），涵蓋如何收集、存儲、使用、共享和保護客戶信息。

This Privacy Policy does not apply if we process Personal Data on behalf of our Corporate Users in the capacity of a processor or service provider, including when we provide MytePro SaaS products and services to our Corporate Users or when our Corporate Users (or their Affiliates) use such data to: (i) create their websites and applications operating on our platform; (ii) sell or provide their own products and services; (iii) send electronic messages to others; or (iv) collect, use, share or process Personal Data through our MytePro SaaS products and services.

如果我們代表我們的企業用戶以處理者或服務提供方的身份處理個人資料數據（包括我們向我們的企業用戶提供MytePro SaaS產品和服務，或我們的企業用戶（或其關聯方）通過這些數據：（i）創建在我們的平臺上運行的他們自己的網站和應用程序；（ii）出售或提供自己的產品和服務；（iii）向他人發送電子訊息；或（iv）通過我們的MytePro SaaS產品和服務收集、使用、共享或處理個人資料），則本隱私政策不適用。

Please read the terms of this Privacy Policy carefully and ensure you fully understand our rules for processing your Personal Data and make the choices you deem appropriate. If you have any questions during your review, please contact our dedicated Data Protection Officer by calling our customer service number (if applicable) (please refer to the customer service number applicable to you as set out in the relevant appendix) or sending an email to alan.he@mytepro.com.

請仔細閱讀本隱私政策的全部條款，確認您已完全瞭解我們對您個人資料的處理規則，並作出您認爲適當的選擇。閱讀過程中，您若有任何疑問，撥打我們的客服電話（如適用）（請見相關附錄所列適用於您的電話號碼）或電郵至alan.he@mytepro.com與我們的個人資料保護專職專員聯繫。

If you disagree with any terms of this Privacy Policy, you should stop accessing our website or using the products or services provided by us immediately. For detailed information on privacy or data security when MytePro SaaS products and services are used by Corporate Users and/or their Affiliates as processors, service providers, controllers, or data users, please contact the relevant Corporate Users directly. The privacy or data security practices of Corporate Users may differ from those set out in this Privacy Policy, and we bear no responsibility for the privacy or data security practices of such Corporate Users and/or their Affiliates.

您若不同意本隱私政策中的任何條款，應立即停止訪問我們的網站或使用我們所提供的產品或服務。 如您欲瞭解在使用MytePro SaaS產品和服務的企業用戶和/或企業用戶關聯方是處理者、服務提供方、控制人或資料使用者的情況下的隱私或數據安全的詳細信息，請您直接與相關的企業用戶聯繫。企業用戶在隱私或數據安全方面的做法可能與本隱私政策所載的有差異，我們對該等企業用戶和/或其關聯方在隱私權或數據安全方面的做法不承擔任何責任。

**Part I: Definitions**

**第一部分 定義**

**Affiliates:** has the meaning set out in the appendix applicable to you.

**關聯方：**具有載於適用於您的附錄的定義。

**Corporate User:**  means an organisation that purchases or leases MytePro SaaS products and/or services and is relevant to you (which may be, depending on your individual role, your employer and/or its Affiliates, their property developers, customers, suppliers and other service providers).

**企業用戶：**指與您相關，購買或租用MytePro SaaS產品及/或服務的組織（可以爲（根據您的個人職責）您的僱主和/或其關聯方、其房地產開發商、客戶、供應商和其他服務提供商）。

**Individual User:**  means an individuals who register, sign in and use MytePro SaaS services, more frequently referred to as “user” or “you” in this Privacy Policy.

**個人用戶：**指註冊、登錄、使用MytePro SaaS服務的個人，在本隱私政策中更多地稱爲“用戶”或“您”。

**MytePro SaaS:**  means the MytePro SaaS website (domain: https://apaas.myysaas.com/PubPlatform/Login/index?ReturnUrl=%2f) and the MytePro SaaS client end, App, mini-programs and other internet portals.

**MytePro SaaS：**指MytePro SaaS網站（域名： https://apaas.myysaas.com/PubPlatform/Login/index?ReturnUrl=%2f）及MytePro SaaS客戶端、APP、小程序等互聯網端口。

**MytePro SaaS Service Provider:**  means the provider of MytePro internet information and software technology services as set out in relevant appendix applicable to you.

**MytePro SaaS服務提供者：**指MytePro的互聯網信息及軟件技術服務提供者（見適用於您的附錄）。

**Personal Data:**has the meaning as defined under the relevant laws of the applicable jurisdiction (please refer to the detailed definition set out in the appendix applicable to the relevant jurisdiction).

**個人資料：**具有適用的司法管轄區相關法律就相關概念所定義的含義（詳細定義請見相關司法管轄區的附錄）。

**Sensitive Personal Data:**means Personal Data including identification document numbers, biometric information, bank account number, financial information, location tracking, transaction information and information of children aged 14 or below.

**個人敏感資料：**指包括身份證件號碼、個人生物識別信息、銀行賬號、財產信息、行蹤軌跡、交易信息、14歲以下（含）兒童信息等的個人資料。

**Part II: This Privacy Policy Will Help You Understand the Following**

**第二部分 本隱私政策將幫助您瞭解以下內容**

1. How we collect and use your Personal Data

我們如何收集和使用您的個人資料

1. How we use Cookies and similar technologies

我們如何使用 Cookies 和同類技術

1. How we share, transfer, publicly disclose your Personal Data

我們如何共享、轉讓、公開披露您的個人資料

1. How we protect and store your Personal Data

我們如何保護和保存您的個人資料

1. How you can manage your Personal Data

您如何管理您的個人資料

1. Protection of minors’ Personal Data

未成年人的個人資料保護

1. Notifications and revisions

通知和修訂

1. How to contact us

如何聯繫我們

1. **How We Collect and Use Your Personal Data**

**我們如何收集和使用您的個人資料**

For the purposes of this Privacy Policy, Personal Data includes but is not limited to:

爲本隱私政策之目的，個人資料包括但不限於：

basic information, including your **name, date of birth, gender, address, personal phone number and personal email address**;

基本信息（包括**個人姓名、生日、性別、住址、個人電話號碼、個人電子郵箱**）；

personal identification information, including **identity card, passport, drivers license and facial features**;

個人身份信息（包括**身份證、護照、駕駛證、面部特徵等**）；

online identity information, such as **electronic signatures, system accounts, account names, IP address, email address and related passwords, passphrases and security answers**;

網絡身份標識信息（如**電子簽名、系統賬戶、賬戶名、IP地址、郵箱地址及與前述有關的密碼、口令、口令保護答案**）；

personal financial information, such as **bank account number, payment platform information, property information, transaction records and other virtual property information**;

個人財產信息（如**銀行帳號、支付平臺信息、房產信息、交易記錄、交易賬戶等虛擬財產信息**）；

unique device identifiers, including **IMEI/Android ID/IDFA/OPENUDID/GUID, SIM card IMSI information and MAC address**; and

唯一設備識別碼（**IMEI/Android ID/IDFA/OPENUDID/GUID、SIM 卡IMSI信息、MAC地址**）；以及

other information, such as **contact lists, travel information, web browsing records and precise location information**.

其他信息（**如通訊錄、行程信息、網頁瀏覽記錄、精準定位信息**）。

When you use MytePro SaaS products and/or services, we and/or our Corporate Users need/may need to collect and use your Personal Data, including the following two types:

在您使用MytePro SaaS產品及/或服務時，我們及/或我們的企業用戶需要/可能需要收集和使用的您的個人資料包括如下兩種：

1. Necessary information to provide you with the basic features of MytePro SaaS products and/or services, for which you must authorise us and/or our Corporate User to collect and use such information. If you refuse to provide such information, you will be unable to use the basic business features of MytePro SaaS products and/or services, including features necessary for user registration services and information search and display.

爲實現向您提供MytePro SaaS產品及/或服務的基本功能，您須授權我們及/或我們的企業用戶收集、使用的必要的信息。如您拒絕提供相應信息，您將無法正常使用MytePro SaaS產品及/或服務的基本業務功能，包括註冊用戶服務、實現信息搜索和展示所必須的功能；

1. Optional information to provide you with supplementary features of MytePro SaaS products and/or services, for which you may choose to authorise us and/or our Corporate User to collect and use such information. If you refuse to provide such information, you will be unable to use the relevant features or achieve the desired functionality, but it will not affect your normal use of the basic features of MytePro SaaS products and/or services.

爲實現向您提供MytePro SaaS產品及/或服務的附加功能，您可選擇授權我們及/或我們的企業用戶收集、使用的信息。如您拒絕提供，您將無法正常使用相關功能或無法達到我們擬達到的功能效果，但並不會影響您正常使用MytePro SaaS產品及/或服務的基本功能。

You understand and agree:

您理解並同意：

1. We are committed to offering a wide range of products and services to meet your needs. Due to the variety of products and services we provide and the differences in the specific products/services chosen by different Corporate Users, the corresponding basic/supplementary features and the types and scope of collected Personal Data may vary. Please refer to the specific product/service features for details.

我們致力於打造多樣的產品和服務以滿足您的需求。因我們向您提供的產品和服務種類衆多，且不同企業用戶選擇使用的具體產品/服務範圍存在差異，相應地，基本/附加功能及收集使用的個人資料類型、範圍等會有所區別，請以具體的產品/服務功能爲準。

1. To provide you with a better product and user experience, we continuously strive to improve our technology. Consequently, we may introduce new or optimised features from time to time, which may require the collection, use and/or disclosure of new Personal Data or changes in the purpose or method of using Personal Data. We will explain the purpose, scope and method of using such information through updates to this Privacy Policy, pop-ups, or page prompts and provide you with the means to opt-in. We will collect, use and/or disclose such information only after obtaining your explicit consent. During this process, if you have any questions, comments or suggestions, please contact our dedicated Data Protection Officer by calling our customer service number (if applicable) (please refer to the customer service number applicable to you as set out in the relevant appendix) or sending an email to alan.he@mytepro.com and we will respond as soon as possible.

爲給您帶來更好的產品和服務體驗，我們在持續努力改進我們的技術，隨之我們可能會不時推出新的或優化後的功能，可能需要收集、使用及/或披露新的個人資料或變更個人資料使用目的或方式。對此，我們將通過更新本隱私政策、以彈窗、頁面提示等方式另行向您說明對應信息的收集目的、範圍及使用方式，併爲您提供自主選擇同意的方式，且在徵得您明示同意後收集、使用及/或披露。 在此過程中，如果您有任何疑問、意見或建議的，您可撥打我們的客服電話（如適用）（請見附錄所列適用於您的電話號碼）或電郵至alan.he@mytepro.com與我們的個人資料保護專職專員聯繫，我們會盡快爲您作出解答。

For the purposes described in this Privacy Policy, we and/or our Corporate User will collect and use your Personal Data for the following basic/supplementary features of our core business. If you do not provide the relevant information, you will not be able to use MytePro SaaS products/services:

爲本隱私政策所述之目的，我們及/或我們的企業用戶會出於以下核心業務的基本/附加功能，收集和使用您的個人資料，如果您不提供相關信息，您將無法享受MytePro SaaS產品/服務：

1. **Maintain Your Registered Account**

**維護您的註冊賬戶**

1. Basic User Services

基礎用戶服務

We and/or our Corporate User provide basic user services through a MytePro SaaS account. To use the basic services of MytePro SaaS, you need to provide a **lessee code**, as well as the username and password to sign in to the MytePro SaaS account. For services that require the use of MytePro SaaS, we and/or our Corporate User may verify your user identity based on the information you provide to ensure that the services are being provided to you. If you choose to sign in via SMS verification code, you authorise and agree that we and/or our Corporate User may use your **SMS reception and processing features** to send you an SMS to verify your identity.

我們及/或我們的企業用戶通過MytePro SaaS賬戶爲您提供基礎用戶服務。爲使用MytePro SaaS的基礎服務，您需要提供**租戶代碼**，以及用戶名和密碼用於登陸MytePro SaaS賬戶。 對於需要通過MytePro SaaS才能使用的服務，我們及/或我們的企業用戶可能會根據您提供的上述信息校驗您的用戶身份，確保是在爲您本人提供服務。 如您選擇短信驗證碼方式登陸，您授權同意我們及/或我們的企業用戶調用您的**短信接收和處理功能**，向您發送短信以驗證您的身份。

1. Additional User Services

附加用戶服務

Authorised sign-in*:* With your consent, we and/or our Corporate User may share your **account information** (including your **avatar, nickname and other information as shown on the relevant page**)with third parties to facilitate the registration or sign-in of third-party accounts. Furthermore, based on your authorisation, we and/or our Corporate User may obtain your third-party account information from such third parties and link it with your MytePro SaaS account, to enable you to directly sign in and use MytePro SaaS products and/or services via the third-party account. Our and our Corporate User’s use of your relevant information will strictly adhere to the scope of your authorised consent.

授權登錄：經您同意後，我們及/或我們的企業用戶可能向第三方共享您的**賬戶信息（頭像、暱稱及其他頁面提示的信息）**，使您可以便捷地實現第三方賬戶的註冊或登錄。此外，我們及/或我們的企業用戶可能會根據您的授權從第三方處獲取您的第三方賬戶信息，並與您的MytePro SaaS賬戶進行綁定，使您可通過第三方賬戶直接登錄、使用MytePro SaaS產品及/或服務。我們及/或我們的企業用戶將在您授權同意的範圍內使用您的相關信息。

1. Display of Account Information

賬戶信息展示

If you already have a MytePro SaaS account, we and/or our Corporate User may display your aforementioned **Personal Data** (including **organisational structure and corporate information**) on MytePro SaaS, as well as your activities conducted within MytePro SaaS or in connection with products and services linked to your MytePro SaaS account. This includes the display of your Personal Data through MytePro SaaS.

如果您已擁有MytePro SaaS賬戶，我們及/或我們的企業用戶可能會在MytePro SaaS上顯示您的上述**個人資料（組織框架信息和企業信息）**，以及您在MytePro SaaS或與MytePro SaaS賬戶相關聯的產品和服務中執行的操作，包括通過MytePro SaaS集中展示您的個人資料。

1. **Information Necessary to be Collected for Search and Display Features**

**實現信息搜索和展示所必須收集的信息**

To facilitate your operations and ease of use on our platform, we and/or our Corporate User may collect relevant information (including your **contact number and other details**). During your use of MytePro SaaS products and/or services, to identify abnormal account conditions, understand product compatibility and improve and optimise the aforementioned features, we may automatically collect your usage information and store it as **web log** information, including:

爲了便於您在我們平臺操作和使用便利，我們及/或我們的企業用戶可能會收集您的相關的信息（包括您的**聯繫電話**等信息）。 在您使用MytePro SaaS產品及/或服務過程中，爲識別賬戶異常狀態、瞭解產品適配性、改進和優化前述功能，我們可能會自動收集您的使用情況並存儲爲**網絡日誌**信息，包括：

**Device Information:** We and/or our Corporate User will receive and record the information about the device you use (including **software and hardware characteristic information such as device model, operating system version, device settings and device environment information**), information about the location of the device (including **sensor information such as GPS location and WLAN access point, Bluetooth and base stations** based on your authorisation) based on your specific operations during software installation and/or use.

**設備信息**：我們及/或我們的企業用戶會根據您在軟件安裝及/或使用中的具體操作，接收並記錄您所使用的設備相關信息（包括**設備型號、操作系統版本、設備設置、設備環境等軟硬件特徵信息**）、設備所在位置相關信息（包括您授權的**GPS位置以及WLAN接入點、藍牙和基站等傳感器信息**）。

Service Log Information: When you use MytePro SaaS products and/or services, we and/or our Corporate User will automatically collect details of your usage of our services and save them as service logs to provide you with better quality service. Service log information includes **browsing, clicking on links, search queries, bookmarks, sharing information, posting information, as well as IP address, type of browser, telecom operator, language used, date and time of visit**.

服務日誌信息：當您使用MytePro SaaS產品及/或服務時，我們及/或我們的企業用戶會自動收集您對我們服務的詳細使用情況，作爲服務日誌保存，以便更好地爲您提供優質的服務。服務日誌信息包括**瀏覽、點擊查看、搜索查詢、收藏、分享信息、發佈信息，以及IP地址、瀏覽器類型、電信運營商、使用語言、訪問日期和時間**。

Please note that if your identity cannot be identified through your keyword search information, it does not constitute a part of your Personal Data. We and/or our Corporate User thus have the right to use for any purpose to the extent permitted by applicable laws and regulations; only when your keyword search information, either alone or in combination with your other information, is able to so far as is practicable ascertain your identity will we and/or our Corporate User, when using it alone or in combination with other information, treat your keyword search information as your Personal Data and process and protect it together with your search history in accordance with this Privacy Policy.

請您注意，如您的搜索關鍵詞信息無法識別您的身份，其將不屬於您的個人資料，我們及/或我們的企業用戶有權在法律法規允許的範圍內對其進行自主使用；只有當您的搜索關鍵詞信息單獨或與您的其他信息相互結合使用並可以切實可行地確認您的身份時，則在單獨或結合使用期間，我們及/或我們的企業用戶會將您的搜索關鍵詞信息作爲您的個人資料，與您的搜索歷史記錄一同按照本隱私政策對其進行處理與保護。

1. **Information Necessary to be Collected for Customer Service and Dispute Resolution**

**客戶服務及爭議處理所必須收集的信息**

When you require customer service from us and/or our Corporate User, our Corporate User’s and/or our customer service representatives will use your relevant information, primarily your account information. To ensure the security of your account, our Corporate User’s and/or our customer service representatives may verify your identity. Upon successful verification, we and/or our Corporate User will retrieve the relevant information you need. You may also provide additional information during your communication with our Corporate User’s and/or our customer service representatives. To protect your legitimate interests and ensure the legality and compliance of our customer service, as well as to continuously improve our customer service capabilities, we and/or our Corporate User will make a sound recording or retain the records of text messages of your communications with the customer service representatives. Such records will be stored and processed within the limits and duration permitted by law and may be disclosed as necessary to protect your rights, or in response to government or judicial investigations. For the reasonable needs of service provision and quality improvement, we and/or our Corporate User may also use other information you provide during your communication with customer service representatives or in response to surveys.

當您需要我們及/或我們的企業用戶提供客戶服務時，我們及/或我們的企業用戶的客服會使用您的相關信息，主要包括賬戶信息。 爲保證您的賬戶安全，我們及/或我們的企業用戶的客服可能會對您的身份進行覈驗。待您的身份覈驗後，我們及/或我們的企業用戶將會爲您查詢您所需要的相關信息。您有可能會在與我們及/或我們的企業用戶的客服人員溝通時，提供給出上述信息外的其他信息。 爲保障您的合法權益，以及爲保證我們及/或我們的企業用戶的客戶服務合法合規，並持續改進我們及/或我們的企業用戶的客戶服務能力，我們及/或我們的企業用戶會對您與客服溝通的過程進行錄音或文字留存，該留存信息僅會在法律所允許的期限和範圍內予以留存和處理，並可能在基於您的維權需要、政府部門及司法部門的調查指令需要提供時，我們及/或我們的企業用戶會進行必要披露。爲了提供服務及改進服務質量的合理需要，我們及/或我們的企業用戶還可能使用的您的其他信息，包括您與客服聯繫時您提供的相關信息，您參與問卷調查時向我們發送的問卷答覆信息。

1. **Information Necessary to be Collected for Collaborative Services**

**協同服務所必需收集的信息**

We and/or our Corporate User, upon obtaining your authorisation, will offer collaborative services. These services require the collection of your Personal Data (including **name, mobile phone number and identification document number**) and sharing it with collaborative service organisations. Collaborative service organisations are entities with which we and/or our Corporate User and/or MytePro SaaS service providers have signed written agreements with and which possess legal business qualifications.

在取得您授權的前提下，我們及/或我們的企業用戶爲您提供協同作業服務，需要收集您的個人資料（包括**姓名、手機號碼、身份證件號碼**），並共享給協同合作機構。 協同合作機構都是與我們及/或我們的企業用戶、及/或MytePro SaaS服務提供者簽訂書面合作協議、具備合法經營資質的機構。

1. **Information Necessary to be Collected to Ensure Business Information Security**

**保障業務信息安全所必須收集的信息**

To enhance the security of the system while you are using MytePro SaaS products and/or services, and to more accurately prevent phishing fraud and protect account security, we and/or our Corporate User may collect **information about your device** (such as **device model, device identification code, device identifier**) and your network usage habits (such as **browsing history, frequently used software**) to assess the risk of your account. We may also record Uniform Resource Locators (“URLs”) deemed to be potentially risky. Additionally, we will collect your **device information** to analyse issues within the MytePro SaaS system, to statistically analyse traffic and to identify potential risks when you choose to send us abnormal information for troubleshooting purposes.

爲提高您使用MytePro SaaS產品與/或服務時系統的安全性，更準確地預防釣魚網站欺詐和保護賬戶安全，我們及/或我們的企業用戶可能會通過了解您的**設備信息**（如**設備型號、設備識別碼、設備標識符**）、您的網絡使用習慣（如**瀏覽信息、常用軟件信息**）等手段來判斷您的賬戶風險，並可能會記錄一些我們認爲有風險的鏈接（“URL”）；我們也會收集您的**設備信息**對於MytePro SaaS系統問題進行分析、統計流量並排查可能存在的風險、在您選擇向我們發送異常信息時予以排查。

1. **Information Necessary to be Collected to Ensure the Security of Personal Privacy Information**

**保障個人隱私信息安全所必須收集的信息**

To maximise the security of users personal privacy information and protect users from phishing, fraud, telemarketing and other nuisances, we and/or our Corporate User provide comprehensive services to protect user’s information privacy. These services cover various business scenarios such as customer approval and statements review. In these scenarios, we and/or our Corporate User will collect your Personal Data, primarily including account information, mobile phone numbers and access data.

爲了最大程度保障用戶的個人隱私信息安全，保護用戶免受釣魚、欺詐、電話營銷等困擾，我們及/或我們的企業用戶會爲用戶提供全面的用戶信息隱私保護服務，覆蓋客戶審批處理和報表查看等多個業務場景，我們及/或我們的企業用戶在該等服務場景中會收集您的個人資料等相關信息，主要包括賬戶信息、手機號碼、以及訪問數據。

1. **Information Necessary to be Collected to Maintain the Secure and Stable Operation of Products and/or Services**

**維護產品與/或服務的安全穩定運行所必須收集的信息**

To ensure the secure and stable operation of the products and/or services we provide, such as identifying and addressing product and/or service faults, we may collect your relevant information during maintenance processes.

爲了維護所提供的產品與/或服務的安全穩定運行，例如發現、處置產品與/或服務的故障，我們在維護的過程中可能會收集您的相關信息。

1. **Situations Where You May Choose Whether to Authorise Us to Collect and Use Your Personal Data**

**您可選擇是否授權我們收集和使用您的個人資料的情形**

1. To make your use of MytePro SaaS products and/or services more efficient or enjoyable, thereby enhancing your user experience, the following supplementary features of the MytePro SaaS products and/or services may collect, use and disclose your Personal Data. If you do not provide the relevant Personal Data, you can still use the basic features of MytePro SaaS products and/or services, but you may not be able to use these supplementary features that could provide you with more enjoyment or may need to repeatedly enter some information when using certain products or services. These supplementary features include:

爲使您使用MytePro SaaS產品及/或服務更便捷或更有樂趣，從而提升您在MytePro SaaS產品及/或服務的體驗，MytePro SaaS產品及/或服務的以下附加功能中可能會收集、使用和披露您的個人資料。如果您不提供您的這些個人資料，您依然可以使用MytePro SaaS產品及/或服務中的基本功能，但您可能無法使用這些可以爲您帶來更多樂趣的附加功能或在使用某些產品或服務時需要重複填寫一些信息。這些附加功能包括：

1. Supplementary features based on **device’s camera**:you can use this feature to achieve video recording, taking photos, scanning codes and facial recognition sign-in. We and/or our Corporate User may apply facial recognition technology to more scenarios, and at that time, we and/or our Corporate User will confirm with you again whether you agree to allow us and/or our Corporate User to use your facial information to achieve these supplementary features.

基於**攝像頭（相機）**的附加功能：您可以使用這個附加功能完成視頻拍攝、拍照、掃碼以及人臉識別登錄的功能。我們及/或我們的企業用戶可能會將人臉識別技術應用於更多場景，屆時將與您再次確認，您是否願意我們及/或我們的企業用戶使用您的面部信息來實現這些附加功能。

1. Supplementary features based on **image uploading:**you can upload certain business data by uploading your images in MytePro SaaS products and/or services, such as supporting documents on certain data for the approval process and on-site inspection photos for issue tracking. At that time, we will confirm with you again whether you agree to allow us and/or our Corporate User to use the aforementioned information to achieve these supplementary features**.**

基於**圖片上傳**的附加功能：您可以在MytePro SaaS產品及/或服務上傳您的照片來實現部分業務數據的上傳功能，比如審批的部分數據佐證，以及事項追蹤過程中實地考察圖片等，屆時將與您再次確認您是否願意我們及/或我們的企業用戶使用前述信息來實現這個附加功能。

1. Supplementary features based on **voice technology:**you can directly use your microphone to consult and communicate with our Corporate User’s and our customer service chatbots. When using these features, we will process your voice recordings to identify your needs and requirements for customer service and after-sales. At that time, we and/or our Corporate User will confirm with you again whether you agree to allow our Corporate User and us to use the aforementioned information to achieve these supplementary features.

基於**語音技術**的附加功能：您可以直接使用麥克風來與我們及/或我們的企業用戶客服機器人進行諮詢和互動。在使用這些功能時，我們及/或我們的企業用戶會處理您的錄音內容，以識別您需求和客服與售後需求。屆時將與您再次確認您是否願意我們及/或我們的企業用戶使用前述信息來實現這個附加功能。

1. Supplementary features based on **SMS:** for certain sensitive activities within MytePro SaaS products and/or services, you can send verification information to your phone via SMS, WeChat, or other third-party communication tools.

基於發送**短信**的附加功能：您可以將MytePro SaaS產品及/或服務中的部分敏感操作的驗證信息，通過您的電話短信、微信等第三方通訊工具發送給您。

1. Supplementary features for **making phone calls:**if you want to search users in the enterprise directory and get direct connection rapidly, you can use this feature. Additionally, some of your Personal Data may also be shown in the enterprise directory related to you, for use by other users of ours and/or our Corporate User and/or other users related to your enterprise.

**撥打電話**的附加功能：如果您想查詢企業通訊錄的用戶，並實現快速直聯的操作，可通過該功能實現。另外，部分關於您的個人資料也在與您相關的企業通訊錄中刊登出來，供其他我們及/或我們的企業用戶及/或與您相關的企業的其他用戶所使用。

1. **Improving our products and/or services:**for the reasonable needs of providing services and improving service quality, we and/or our Corporate User may obtain other information from you. This includes information you provide during your communication with customer service representatives, your responses to our surveys and information that is authorised to be shared with us and/or our Corporate User during your interaction with us and/or our Corporate User’s Affiliates or partners.

**改進我們的產品與/或服務**：爲了提供服務及改進服務質量的合理需要，我們及/或我們的企業用戶可能會獲得的您的其他信息，包括您與客服聯繫時您提供的相關信息，您參與問卷調查時向我們及/或我們的企業用戶發送的問卷答覆信息，以及您與我們及/或我們的企業用戶的關聯方、合作伙伴之間進行互動時，授權我們及/或我們的企業用戶獲得的相關信息。

1. To enable the aforementioned supplementary features, you may be required to grant access to your devices **location (geolocation information), camera, photo album (image gallery) and microphone** to our Corporate User and/or us, so as to facilitate the collection and utilisation of information related to these features. You can individually review the status of these permissions and decide to enable or disable them at any time through the terminal settings: "System Settings -> Application Management -> Permission Management". Please be aware that enabling these permissions means that you authorise our Corporate User and/or us to collect and use your Personal Data to implement the aforementioned features. Conversely, disabling these permissions means that you revoke your authorisation, whereby we and/or our Corporate User will cease collecting and using your Personal Data and will be unable to provide the features associated with those permissions. Your decision to disable permissions will not affect the processing of Personal Data previously conducted based on your authorisation.

上述附加功能可能需要您在您的設備中向我們及/或我們的企業用戶開啓您的**地理位置（位置信息）、相機（攝像頭）、相冊（圖片庫）以及麥克風**訪問權限，以實現這些功能所涉及的信息的收集和使用。您可以在終端通過“系統設置->應用管理->權限管理”中逐項查看您上述權限的開啓狀態，並可以決定將這些權限隨時的開啓或關閉。請您注意，您開啓這些權限即代表您授權我們及/或我們的企業用戶可以收集和使用這些個人資料來實現上述的功能，您關閉權限即代表您取消了這些授權，則我們及/或我們的企業用戶將不再繼續收集和使用您的這些個人資料，也無法爲您提供上述與這些授權所對應的功能。您關閉權限的決定不會影響此前基於您的授權所進行的個人資料的處理。

1. **You Fully Understand that under the Following Circumstances as Required and Permitted by Applicable Laws and Regulations, Your Authorisation and Consent May Not Be Required for Our Collection, Holding, Processing or Use of Personal Data:**

**您充分知曉，在適用的法律法規要求並容許的情況下，以下情形中，我們收集、持有、處理或使用個人資料可能無需徵得您的授權同意：**

1. where it is directly related to national security or national defence security;

與國家安全、國防安全直接相關的；

1. where it is directly related to public safety, public health, or major public interest;

與公共安全、公共衛生、重大公共利益直接相關的；

1. where it is directly related to criminal investigations, prosecutions, trials and the execution of rulings;

與犯罪偵查、起訴、審判和判決執行等直接相關的；

1. where it is required to protect the life, property or other material legitimate interests of you or other individuals but it is difficult to obtain the consent of you or such other individuals. Please refer to the appendices which set out the additional requirements that may apply;

出於維護您或其他個人的生命、財產等重大合法權益但又很難得到本人同意的。請參閱載於附錄可能適用的附加要求；

1. where the Personal Data collected has been voluntarily disclosed by you to the public and you have agreed that it may be used by anyone without restriction;

所收集的個人資料是您自行向社會公衆公開並同意任何人可以無限制使用的；

1. where it is necessary for the execution and performance of a contract to which you are a party; or

根據您的要求籤訂和履行合同所必需的；或

1. other circumstances as stipulated by laws and regulations.

法律法規規定的其他情形。

1. **Circumstances Where We and/or Our Corporate User Obtain Your Personal Data from Third Parties**

**我們及/或我們的企業用戶從第三方獲得您個人資料的情形**

We and/or our Corporate User may obtain account information (such as **avatar, mobile phone number, nickname, city and geolocation**) the sharing of which has been authorised by you from third parties. Upon your agreement to this Privacy Policy, your third-party account may be linked to your MytePro SaaS account, enabling you to sign in and use MytePro SaaS products and/or services directly via your third-party account. We and/or our Corporate User will use your Personal Data in compliance with the relevant laws and regulations, based on agreements with third parties and after confirming the legality of the data source.

我們及/或我們的企業用戶可能從第三方獲取您授權共享的賬戶信息（**頭像、手機號碼、暱稱、城市 、地理位置**），並在您同意本隱私政策後將您的第三方賬戶與您的MytePro SaaS賬戶綁定，使您可以通過第三方賬戶直接登錄並使用MytePro SaaS產品與/或服務。我們及/或我們的企業用戶會將依據與第三方的約定、對個人資料來源的合法性進行確認後，在符合相關法律和法規規定的前提下，使用您的這些個人資料。

1. **Rules for the Use of Your Personal Data and Other Purposes**

**您個人資料使用的規則及其他目的**

1. We will use the Personal Data collected in accordance with this Privacy Policy to the extent necessary to perform the functions of MytePro SaaS products and/or services.

我們會根據本隱私政策的約定，在實現MytePro SaaS產品與/或服務功能所必要的範圍內，對所收集的個人資料進行使用。

1. After collecting your Personal Data, we may anonymise a part of the data through technical means such that the anonymised information is not possible to identify the data subject. Please understand and consent that in this case we have the right to use information that has been anonymised and, subject to non-disclosure of your Personal Data, we are entitled to analyse the user database and use it for commercial purposes.

在收集您的個人資料後，我們可能將通過技術手段對部分數據進行匿名化處理，匿名化處理的信息將無法識別主體。請您瞭解並同意，在此情況下我們有權使用已經匿名化的信息；並在不透露您個人資料的前提下，我們有權對用戶數據庫進行分析並予以商業化的利用。

1. Please note that, unless you delete your Personal Data or withdraw your consent through the system settings or contacting us, by providing us with all Personal Data when using our products and/or services, we will be continuously authorised to use your Personal Data within the duration of your use of our products and/or services. When your engagement with the Corporate User ceases, or when you are relocated to another position not related to our products and/or services, if we are instructed by our Corporate User, we will cancel your account and stop using and delete your Personal Data.

請您注意，您在使用我們的產品與/或服務時所提供的所有個人資料，除非您刪除您的個人資料或通過系統設置或聯繫我們等方式撤回您的同意，否則將在您使用我們的產品與/或服務期間持續授權我們使用您的個人資料。在您於企業用戶的委任終止或您調崗至與我們的產品與/或服務無關的崗位時，如果我們的企業用戶有所指令，我們將註銷賬戶及停止使用並刪除您的個人資料。

1. We will generate the statistics on the use of MytePro SaaS products and/or services and may share the statistical information with the public or any third parties to demonstrate the overall trends in the use of MytePro SaaS products and/or services. However, such statistics would not include any of your personally identifiable information.

我們會對MytePro SaaS產品與/或服務使用情況進行統計，並可能會與公衆或第三方共享這些統計信息，以展示MytePro SaaS的產品與/或服務的整體使用趨勢。但這些統計信息不包含您的任何身份識別信息。

1. When we display your Personal Data, we will desensitise your information by data masking methods such as content substitution and information de-identification so as to keep your information secure.

當我們展示您的個人資料時，我們會採用包括內容替換、去標識化處理等方式對您的信息進行脫敏，以保護您的信息安全。

1. When we intend to use your Personal Data for any purpose other than those described in this Privacy Policy, or data which is collected for a specific purpose is intended to be used for other purposes, we will seek your consent in advance by requesting you to voluntarily tick the box(es) as appropriate.

當我們要將您的個人資料用於本隱私政策未載明的其它用途時，或基於特定目的收集而來的信息用於其他目的時，會要求您通過主動勾選的形式事先徵求您的同意。

1. **How We Use Cookies and Similar Technologies**

**我們如何使用 Cookies 和同類技術**

1. **Use of Cookies**

**Cookies的使用**

1. In order to make your user experience as smooth and easy as possible, we will place one or more small data files called cookies on your computer or mobile devices. The cookies assigned to you are unique and can only be read by the web server in the domain where the cookies are posted to you. We send cookies to you to simplify your re-login steps and help to determine your login status and account or data security.

爲使您獲得更輕鬆的訪問體驗。我們會在您的計算機或移動設備上發送一個或多個名爲Cookies的小數據文件，指定給您的Cookies 是唯一的，它只能被將Cookies發佈給您的域中的Web服務器讀取。我們向您發送Cookies是爲了簡化您重複登錄的步驟、幫助判斷您的登錄狀態以及賬戶或數據安全。

1. We will not use cookies for any purpose other than those described in this Privacy Policy. You can manage or delete cookies according to your preference. You can clear all cookies saved on your computer. Most web browsers automatically accept cookies, but you can usually modify your browser settings to reject cookies or clear all cookies saved in the software according to your needs. However, if you do so, you may need to personally change your user settings every time you visit MytePro website and the corresponding information you have previously recorded will also be deleted, and this may have a certain impact on the security of the services you use.

我們不會將 Cookies 用於本隱私政策所述目的之外的任何用途。您可根據自己的偏好管理或刪除 Cookies。您可以清除計算機上保存的所有 Cookies，大部分網絡瀏覽器會自動接受Cookies，但您通常可根據自己的需要來修改瀏覽器的設置以拒絕 Cookies；另外，您也可以清除軟件內保存的所有Cookies。但如果您這麼做，您可能需要在每一次訪問MytePro網站時親自更改用戶設置，而且您之前所記錄的相應信息也均會被刪除，並且可能會對您所使用服務的安全性有一定影響。

1. **Use of Web Beacons and Similar Technologies**

**網絡Beacon和同類技術的使用**

In addition to cookies, we also use other similar technologies such as web beacons on our website. Our webpages often contain electronic images (known as "single-pixel" GIF files or "web beacons"). We use web beacons in a number of ways, including the use of web beacons via MytePro, counting the number of user visits and identifying the registered users of MytePro by accessing Cookies.

除 Cookie 外，我們還會在網站上使用網絡Beacon等其他同類技術。我們的網頁上常會包含一些電子圖像（稱爲“單像素” GIF 文件或“網絡 beacon”）。我們使用網絡beacon的方式包括通過MytePro使用網絡beacon，計算用戶訪問數量，並通過訪問 Cookies 辨認註冊的MytePro用戶。

1. **How We Share, Transfer, Publicly Disclose Your Personal Data**

**我們如何共享、轉讓、公開披露您的個人資料**

1. **Sharing of Information**

**共享**

1. We will not share your Personal Data with any companies, organisations and individuals other than us, our Affiliates, our Corporate User and/or collaborative service organisations, except in the following circumstances as required and permitted by applicable laws and regulations:

我們不會與我們、我們的關聯方、我們的企業用戶及/或協同服務機構以外的任何公司、組織和個人共享您的個人資料，但在適用的法律法規要求並容許的情況下，以下情況除外：

1. where your prior express consent or authorisation is obtained (including the consent or authorisation specified in this Privacy Policy);

事先獲得您明確的同意或授權（包括根據本隱私政策所列的同意或授權）；

1. where it is directly related to national security or national defence security;

與國家安全、國防安全直接相關的；

1. where it is directly related to public safety, public health, or major public interest;

與公共安全、公共衛生、重大公共利益直接相關的；

1. where it is directly related to criminal investigations, prosecutions, trials and the execution of rulings;

與犯罪偵查、起訴、審判和判決執行等直接相關的；

1. where it is required to protect the life, property or other material legitimate rights and interests of the data subject or other individuals while it is difficult to obtain the consent of such data subject or individuals. Please refer to the appendices which set out the additional requirements that may apply; or

出於維護個人資料主體或其他個人的生命、財產等重大合法權益但又很難得到本人同意的。請參閱載於附錄可能適用的附加要求；或

1. where the Personal Data has been voluntarily disclosed by you to the public and you have agreed that it may be used by anyone without restriction.

您自行向社會公衆公開並同意任何人可以無限制使用的個人資料。

1. After obtaining your authorisation, we may share your Personal Data with our Affiliates, collaborative service organisations and Corporate User. We will only share the necessary Personal Data and request our Affiliates and Corporate User to protect the Personal Data at a standard that is no less favourable than the level of protection afforded by this Privacy Policy. Our Affiliates, collaborative service organisations and Corporate User will seek your authorisation and consent again if they wish to change the purposes for which Personal Data is processed. With respect to the services provided to you by these Affiliates, collaborative service organisations and Corporate User, we do not make any commitment or assume any responsibility for the nature and quality of the services provided by these Affiliates, collaborative service organisations and Corporate User, nor do we make any commitment or assume any responsibility for the collection and processing of user information independently conducted by such Affiliates, collaborative service organisations and Corporate User. Please read the privacy policies of these Affiliates, collaborative service organisations and Corporate User carefully to understand the data privacy controls and options associated with your use of their services as well as the privacy rules of the service providers.

經您授權後，我們可能會將您的個人資料與我們的關聯方、協同服務機構、企業用戶共享。我們只會共享必要的個人資料，並要求關聯方、企業用戶以不低於本隱私政策水平的方式保護您的個人資料。我們的關聯方、協同服務機構、企業用戶如要改變個人資料的處理目的，將再次徵求您的授權同意。就上述關聯方、協同服務機構、企業用戶向您提供的服務，我們對該等關聯方、協同服務機構、企業用戶提供的服務性質與質量不作任何承諾或承擔任何責任，對該等關聯方、協同服務機構、企業用戶獨立進行的用戶信息採集和處理行爲也不作任何承諾或承擔任何責任。有關您在使用關聯方、協同服務機構、企業用戶服務中相關的隱私控制和選項，以及服務提供者的隱私規定，請您謹慎參閱該等關聯方、協同服務機構、企業用戶所提供的隱私政策

1. For companies, organisations and individuals with whom we share Personal Data, we sign strict confidentiality agreements with them, requiring them to handle Personal Data in accordance with our instructions and any other relevant confidentiality and security measures. In terms of the use of Sensitive Personal Data, we require third parties to adopt data desensitisation and encryption techniques to better protect user data.

對我們與之共享個人資料的公司、組織和個人，我們會與其簽署嚴格的保密協定，要求他們按照我們的說明以及其他任何相關的保密和安全措施來處理個人資料。在個人敏感資料使用上，我們要求第三方採用資料脫敏和加密技術，從而更好地保護用戶資料。

1. In order to comply with the laws, enforce or apply our conditions of use and other agreements, or to protect the rights of MytePro, you or other users of MytePro and your/their property or security (such as exchanging information with credit organisations so as to prevent the occurrence of fraud and other unlawful activities and to reduce credit risk, and confirming your ability of contractual performance), we may obtain information about your personal creditworthiness with a third-party credit organisation by providing your identity document information to the credit organisation. The foregoing sharing of information does not include selling, renting, sharing or otherwise disclosing Personal Data for profit in violation of the commitment made under this Privacy Policy.

爲了遵守法律、執行或適用我們的使用條件和其他協議，或者爲了保護MytePro、您或其他MytePro用戶的權利及其財產或安全（比如爲防止欺詐等違法活動和減少信用風險，而與徵信機構交換信息，比如爲了確認您的履約能力），我們會向第三方徵信機構提供您的身份證件信息以獲取您在徵信機構的個人信用。前述共享行爲並不包括違反本隱私政策中所作的承諾而爲獲利目的出售、出租、共享或以其它方式披露的個人資料。

1. **Transfer and Public Disclosure**

**轉讓與公開披露**

In the event of our merger, acquisition, transfer of assets or similar transaction involving the transfer of Personal Data, we will require the new company or organisation which holds your Personal Data to continue to be bound by this Privacy Policy, otherwise we will require that company or organisation to seek authorisation or consent from you again. Unless expressly stated herein, we will not transfer or publicly disclose your Personal Data to any company, organisation and individual, except in the following circumstances as required and permitted by applicable laws and regulations:

在涉及關於我們的合併、收購、資產轉讓或類似的交易時，如涉及到個人資料轉讓，我們會要求新的持有您個人資料的公司、組織繼續受本隱私政策的約束，否則我們將要求該公司、組織重新向您徵求授權同意。除本隱私政策所明確述明的情況以外，我們不會將您的個人資料轉讓或公開披露給任何公司、組織和個人，但在適用的法律法規要求並容許的情況下，以下情況除外：

1. where it is directly related to national security or national defence security;

與國家安全、國防安全直接相關的；

1. where it is directly related to public safety, public health or major public interest;

與公共安全、公共衛生、重大公共利益直接相關的；

1. where it is directly related to criminal investigations, prosecutions, trials and the execution of rulings;

與犯罪偵查、起訴、審判和判決執行等直接相關的；

1. where it is required to protect the life, property or other material legitimate interests of you or other individuals but it is difficult to obtain the consent of you or such other individuals. Please refer to the appendices which set out the additional requirements that may apply; or

出於維護您或其他個人的生命、財產等重大合法權益但又很難得到本人同意的。請參閱載於附錄可能適用的附加要求；或

1. where the Personal Data has been voluntarily disclosed by you to the public and you have agreed that it may be used by anyone without restriction.

您向社會公衆公開並同意任何人可以無限制使用的個人資料。

1. **Regarding the Management of Third-Party Plug-Ins**

**關於第三方插件管理**

In order to provide you with more professional and secure basic business functions and additional business functions, MytePro SaaS products will access third-party plug-in products (including the deployment of statistical analysis tools in our webpages or Apps, software development toolkit (SDK), call maps API interface, etc). For more information regarding how the third parties collect and use your Personal Data, it is recommended that you refer to the relevant service agreement and Personal Data protection policy of third-party SDK. If you wish to know more about third-party SDK accessible by us, please read the status update about third-party SDK.

爲了給您提供更專業、安全的基本業務功能和附加業務功能，MytePro SaaS產品中會接入第三方插件產品（包括在我們的網頁或應用程序中部署統計分析工具、軟件開發工具包SDK、調用地圖API接口等），關於第三方如何收集、使用您的個人資料，建議您參考第三方SDK的相關服務協議及個人資料保護政策。如果您希望進一步瞭解我們所接入的第三方SDK情況，請您閱讀第三方SDK情況說明。

The third-party plug-ins used by us include but not limited to:

我們使用的第三方插件包括但不限於：

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Type of product產品類型 | Use scenario使用場景 | Name of third party第三方名稱 | Personal Data involved涉及個人資料 | Link to third party第三方鏈接 |
| WeChat SDK微信SDK | Users use WeChat to share content to the WeChat platform用戶使用微信分享內容到微信平臺 | Tencent 騰訊 | MAC address, unique device identification codeMAC地址、唯一設備識別碼 | [WeChat Open Platform Developer Service Agreement](https://open.weixin.qq.com/cgi-bin/frame?t=news/protocol_developer_tmpl) |
| Ali Object Storage Service阿里 OSS 上傳 SDK | Used when users upload images or videos在用戶上傳圖片或視頻時使用 | Ali Cloud阿里雲 | SIM information, writing external storage, reading files in the devices external storage space SIM 信息，寫入外部存儲，讀取設備外部存儲空間的文件 | [Financial Grade Real Person Authentication SDK Privacy Policy (aliyun.com)](https://terms.aliyun.com/legal-agreement/terms/suit_bu1_ali_cloud/suit_bu1_ali_cloud202107281509_18386.html?spm=a2c4g.11186623.0.0.37c330e52FA55i) |
| Speech recognition and transcription 實時語音聽寫 | Providing users with speech-to-text transcription and recognition functions爲用戶提供語音錄入，識別功能 | iFlytek科大訊飛 | IMEI, IMSI, Android IDIMEI號、IMSI碼、安卓ID | [Voice Dictation (Streaming Version) SDK Privacy Policy | iFlytek Open Platform Document Center (xfyun.cn)](https://www.xfyun.cn/doc/asr/voicedictation/online_iat_sdkprivacy.html) |
| AWS SDK亞馬遜雲服務SDK | Used for facial recognition and matching when users upload facial images用戶上傳人像時，進行人臉匹配 | Amazon Web Services (AWS)亞馬遜雲服務 | Facial images and features人像照片和特徵 | <https://aws.amazon.com/privacy/?nc1=h_ls> |

1. **How We Protect and Store Your Personal Data**

**我們如何保護和保存您的個人資料**

1. **Technologies and Measures Taken by Us to Protect Your Personal Data**

**我們保護您個人資料的技術與措施**

We extremely value Personal Data security and will take all reasonable and practical measures to protect your Personal Data:

我們非常重視個人資料安全，並採取一切合理可行的措施，保護您的個人資料：

1. Technical measures for data security

數據安全技術措施

MytePro takes technical and administrative security measures to prevent unauthorised access to or public disclosure, use, modification, damage or loss of your Personal Data, including but not limited to:

MytePro採取安全技術和管理措施來防止您的個人資料遭到未經授權訪問使用、公開披露、使用、修改、損壞或丟失，包括但不限於：

1. MytePro applies encryption technique to encrypt and save users’ Personal Data, and isolate it through isolation technique. In the use of Personal Data such as the display of Personal Data and Personal Data association algorithm, we will use a variety of data desensitisation techniques including content substitution to enhance the security of Personal Data in use;

MytePro採取加密技術對用戶個人資料進行加密保存，並通過隔離技術進行隔離。在個人資料使用時，例如個人資料展示、個人資料關聯計算，我們會採用包括內容替換在內多種數據脫敏技術增強個人資料在使用中安全性；

1. MytePro uses strict data access right controls and multiple identity authentication technology to protect Personal Data and avoid the misuse of data;

MytePro採取嚴格的數據訪問權限控制和多重身份認證技術保護個人資料，避免數據被違規使用；

1. MytePro uses data access log analysis technology to conduct the security audit of Personal Data.

MytePro採取數據訪問日誌分析技術進行個人資料安全審計。

1. Other security measures adopted by MytePro to protect Personal Data

MytePro爲保護個人資料採取的其他安全措施

Enhance security awareness: we organise training courses on security and privacy protection to enhance the employees awareness of the importance of protecting Personal Data.

加強安全意識：我們會舉辦安全和隱私保護培訓課程，加強員工對於保護個人資料重要性的認識。

1. We will endeavour to ensure the security of any information you send to us. In the event of a breach of our physical, technical or administrative safeguards resulting in the unauthorised access, public disclosure, alteration or destruction of information which causes harm to your legitimate interests, we shall be held liable accordingly.

我們將盡力確保您發送給我們的任何信息的安全性。如果我們的物理、技術、或管理防護設施遭到破壞，信息被非授權訪問、公開披露、篡改、或毀壞，導致您的合法權益受損，我們將承擔相應的法律責任。

1. Dealing with security incidents

安全事件處置

To cope with the risk of leakage, damage and loss of Personal Data,MytePro has formulated a number of systems and set up an emergency response team. Wefollow the norms for handling security incidents, activate security plans for different security incidents, including stopping the loss, conducting analysis and positioning, formulating remedial measures and working with the relevant departments to trace the origin and combat the problem.

爲應對個人資料泄露、損毀和丟失的風險，MytePro制定了多項制度併成立了應急響應團隊。我們按照安全事件的處置規範，針對不同安全事件啓動安全預案，進行止損、分析、定位、制定補救措施、聯合相關部門進行溯源和打擊。

If a Personal Data security incident unfortunately happens, we will, in accordance with the laws and regulations, inform you promptly about the basic information and possible impact of the security incident, the measures we have taken or will take, suggestions on the precautions you can take to reduce risks, remedial measures for you, etc. We will inform you by way of e-mail, letter, telephone or push notification, etc. on a timely basis. When it is difficult to notify a Personal Data subject on an individual basis, we will issue an announcement in a reasonable and effective manner. At the same time, we will also proactively report to the regulatory authority based on its requirements on the handling of Personal Data security incidents.

在不幸發生個人信息資料安全事件後，我們將按照法律法規的要求，及時向您告知：安全事件的基本情況和可能的影響、我們已採取或將要採取的處置措施、您可自主防範和降低風險的建議、對您的補救措施等。我們將及時將事件相關情況以郵件、信函、電話或推送通知等方式告知您，難以逐一告知個人資料主體時，我們會採取合理、有效的方式發佈公告。同時，我們還將按照監管部門要求，主動上報個人資料安全事件的處置情況。

1. If you discover that your Personal Data has been compromised or that we have security flaws or there are suspicious incidents, in particular if your account and password have been compromised, please contact us immediately via the contact details specified at the end of this Privacy Policy so that we can take appropriate measures. Any attempt to test or verify the security flaws in private is prohibited.

如果您發現自己的個人資料泄密或我們存在有安全弱點、可疑安全事件時，尤其是您的賬戶及密碼發生泄露，請您立即通過本隱私政策最下方約定的聯繫方式聯絡我們，以便我們採取相應措施，禁止私自嘗試或驗證弱點。

1. If you have any questions about our Personal Data protection, please contact us via the contact details specified at the end of this Privacy Policy.

如果您對我們的個人資料保護有任何疑問，可通過本隱私政策最下方約定的聯繫方式聯繫我們。

1. **Retention of Your Personal Data**

**您個人資料的保存**

1. Your Personal Data will be stored within the jurisdiction where the property that relates to your use of MytePro SaaS is located. If you use cross-border transaction service and need to transfer your Personal Data outside of your jurisdiction to complete a transaction, or if it is necessary to transfer your Personal Data outside of your jurisdiction based on other essential business needs, we will obtain your authorisation and consent separately and require the recipient to process the Personal Data in accordance with our instructions, this Privacy Policy and any other relevant confidentiality and security measures.

您的個人資料將會被存儲於您使用MytePro SaaS相關物業所在的司法管轄區境內。如您使用跨境交易服務，且需要向您所屬的司法管轄區的境外地區傳輸您的個人資料完成交易的，或基於其他必要的業務需要將您的個人資料傳輸至境外地區時，我們會單獨徵得您的授權同意並要求接收方按照我們的說明、本隱私政策以及其他任何相關的保密和安全措施來處理這些個人資料。

1. If your account is cancelled in the circumstances described above in this Privacy Policy, we will delete or anonymise your Personal Data.

當您的賬戶根據上述本隱私政策的情況註銷後，我們將對您的個人資料進行刪除或匿名化處理。

1. If we terminate the service or operation, we will notify you at least thirty days in advance and delete or anonymise your Personal Data upon the termination of service or operation.

如果我們終止服務或運營，我們會至少提前三十日向您通知，並在終止服務或運營後對您的個人資料進行刪除或匿名化處理。

1. **How You Can Manage Your Personal Data**

**您如何管理您的個人資料**

MytePro attaches great importance to your concern of Personal Data and makes every effort to protect your right to access, correct, delete and withdraw consent to use your Personal Data, so that you have full capacity to protect your privacy and security. These rights are set out below:

MytePro非常重視您對個人資料的關注，並盡全力保護您對於您個人資料查閱、更正、刪除以及撤回同意的權利，以使您擁有充分的能力保障您的隱私和安全。您的權利包括：

1. Access and correct your Personal Data

查閱和更正您的個人資料

Unless provided by laws and regulations, you have the right to access and correct your Personal Data at any time, which specifically include:

除法律法規規定外，您有權隨時查閱和更正您的個人資料，具體包括：

1. Your account information: you can access and correct your Personal Data on MytePro mobile App; the specific path is: “Me” to access my profile - click on the avatar and access “Personal information” settings.

您的賬戶信息：您可以在MytePro移動端App查閱和更正您的個人資料；具體路徑爲：“我的”進入我的檔案--點擊頭像進入“個人信息”設置。

1. If you need to access or correct other Personal Data arising from your use of our products and/or services, please feel free to contact us and/or our Corporate User at any time.

對於您在使用我們的產品與/或服務過程中產生的其他個人資料需要查閱或更正，請隨時聯繫我們及/或我們的企業用戶。

1. Delete your Personal Data

刪除您的個人資料

In the webpages showcasing our products and/or services, information that can be directly erased or deleted by you include the record of business activities, information that has been a focus of attention or browsed, search and subscription information.

您在我們的產品與/或服務頁面中可以直接清除或刪除的信息，包括業務操作記錄、關注或瀏覽信息、搜索訂閱信息。

In any of the following circumstances, you may request us and/or our Corporate User to delete your Personal Data:

在以下情形中，您可以向我們及/或我們的企業用戶提出刪除個人資料的請求：

1. our processing of your Personal Data violates the laws and regulations;

如果我們處理個人資料的行爲違反法律法規；

1. we collect and use your Personal Data without obtaining your consent;

如果我們收集、使用您的個人資料，卻未徵得您的同意；

1. our processing of your Personal Data violates our agreement with you;

如果我們處理個人資料的行爲違反了與您的約定；

1. your MytePro SaaS account is cancelled; or

如果您的MytePro SaaS賬戶已被註銷；或

1. we have terminated our services and operations.

如果我們終止服務及運營。

If we decide to respond to your request for deletion of Personal Data, we will also notify the entities that have obtained your Personal Data from us and require them to delete it in a timely manner, except as otherwise provided by laws and regulations or in cases where your authorisation has been granted to these entities separately.

若我們決定響應您的刪除請求，我們還將同時通知從我們獲得您的個人資料的實體，要求其及時刪除，除非法律法規另有規定，或這些實體獲得您的獨立授權。

1. Change the scope of authorisation and consent or withdraw your authorisation

改變您授權同意的範圍或撤回您的授權

You may change the extent to which you authorise us to continue to collect Personal Data or withdraw your authorisation by deleting the information, disabling device features or changing the privacy settings onthe website or software of MytePro. When your account is cancelled, we will no longer collect and process your Personal Data. Please understand that certain basic Personal Data is required to perform each business function. When you withdraw your consent or authorisation, we will not be able to continue to provide you with the services for which you have withdrawn your consent or authorisation and will no longer process your corresponding Personal Data. However, your decision to withdraw your consent or authorisation will not affect the processing of Personal Data previously commenced based on your authorisation.

您可以通過刪除信息、關閉設備功能、在MytePro網站或軟件中進行隱私設置等方式改變您授權我們繼續收集個人資料的範圍或撤回您的授權。您的賬戶被註銷時，我們不會繼續收集或處理您個人資料。 請您理解，每個業務功能需要一些基本的個人資料才能得以完成，當您撤回同意或授權後，我們無法繼續爲您提供撤回同意或授權所對應的服務，也不再處理您相應的個人資料。但您撤回同意或授權的決定，不會影響此前基於您的授權而開展的個人資料處理。

1. Cancellation of account

註銷賬戶

When your engagement with the Corporate User ceases, or when you are relocated to another position not related to our products and/or services, if we are instructed by our Corporate User, we will cancel your user account. Upon cancellation of your account, we will cease to provide you with products and/or services and, at our Corporate User’s request, we will delete your Personal Data in a timely manner except otherwise provided by laws or regulations.

在您於企業用戶的委任終止或您調崗至與我們的產品與/或服務無關的崗位時，如果我們的企業用戶有所指令，我們將註銷您的賬戶。您的賬戶註銷後，我們將停止爲您提供產品與/或服務，並依據我們的企業用戶的要求，除法律法規另有規定外，我們將及時刪除您的個人資料。

Once your account is cancelled, you will encounter the following risks and problems:

您的賬戶一旦註銷，將面臨如下風險及問題：

1. All businesses involving you will not be able to be conducted, including but not limited to the approval process not being able to be processed and the statements/reports not being able to be viewed, etc.

涉及到您的所有業務將無法進行，包括不限於審批流程將無法處理，報表無法查看等。

1. If your account is subject to penalties or disputes as a result of illegal operation or infringement of other peoples legitimate interests, we will retain the information which is required to deal with such disputes and complaints within a necessary period of time and will delete or anonymise the relevant Personal Data after the expiry of such period of time.

如您的賬戶因違法違規操作或侵犯他人合法權益導致處罰或糾紛，我們將在必要的期限內保留處理此糾紛、投訴所必要的信息，並在該等期限屆滿後對相關個人資料進行刪除或匿名化處理。

1. If you no longer wish to receive the information we send to you, you may opt for cancellation at any time by the following means:

如果您不想接受我們給您發送的信息，您隨時可通過以下方式取消：

1. You can contact our Corporate User who can choose whether to activate “push” or cancel notifications received by you.

您可以聯繫我們的企業用戶，企業用戶可以設置是否開啓或取消“通知”推送給您的信息。

1. In order to protect your privacy, we will not use push notifications to send promotional or product information involving religious belief, sex, disease-related sensitive content to you in any way or manner.

爲了保護您的隱私，我們不會以任何方式和途徑向您推送涉及宗教信仰、性、疾病等相關敏感內容的促銷或商品信息給您。

1. Responding to your request

響應您的請求

If you are unable to access, correct or delete your Personal Data in the manner described above, or if you have to access, correct or delete other Personal Data generated at the time of your use of our products and/or services, or if you believe that MytePro is in violation of any laws or regulations or agreement with you regarding the collection or use of Personal Data, please contact us via the contact details specified at the end of this Privacy Policy.

如果您無法通過上述方式查閱、更正或刪除您的個人資料，或您需要查閱、更正或刪除您在使用我們產品與/或服務時所產生的其他個人資料，或您認爲MytePro存在任何違反法律法規或與您關於個人資料的收集或使用的約定，您均可以通過本隱私政策下方的方式與我們聯繫。

For security purposes, we may require you to submit a request in writing or otherwise prove your identity. We will respond to your request within fifteen (15) days upon receipt of your feedback and verification of your identity. In principle, we do not charge you for your reasonable request; however, we may, depending on the situation, charge a certain amount of cost fees for repeated requests to access your Personal Data that exceed a reasonable limit. To the extent permitted by applicable laws and regulations, we may reject those requests that are duplicative or require excessive technical effort (e.g., requiring the development of new systems or fundamental changes to existing practices), pose risks to the legitimate interests of others or requests that are highly impractical (e.g., involving the backup of information stored on magnetic tapes).

爲了保障安全，我們可能需要您提供書面請求，或以其他方式證明您的身份，我們將在收到您反饋並驗證您的身份後的十五（15）天內答覆您的請求。對於您合理的請求，我們原則上不收取費用，但對多次重複、超出合理限度對於查閱您的個人資料的請求，我們將視情況收取一定成本費用。對於那些無端重複、需要過多技術手段（例如，需要開發新系統或從根本上改變現行慣例）、給他人合法權益帶來風險或者非常不切實際（例如，涉及備份磁帶上存放的信息）的請求，我們可能在適用的法律法規容許的情況下予以拒絕。

Under the following circumstances as required and permitted by applicable laws and regulations, we may not be able to respond to your request:

在以下情形中，在適用的法律法規要求並容許的情況下，我們將可能無法響應您的請求：

1. where it is directly related to national security or national defence security;

與國家安全、國防安全直接相關的；

1. where it is directly related to public safety, public health, or major public interest;

與公共安全、公共衛生、重大公共利益直接相關的；

1. where it is directly related to criminal investigations, prosecutions, trials and the execution of rulings;

與犯罪偵查、起訴、審判和執行判決等直接相關的；

1. where there is sufficient evidence showing subjective malice or abuse of right on your part;

有充分證據表明您存在主觀惡意或濫用權利的；

1. where our response to your request will result in serious damage to the legitimate interests of you or other individuals and organisations; or

響應您的請求將導致您或其他個人、組織的合法權益受到嚴重損害的；或

1. where trade secrets are involved.

涉及商業祕密的。

1. **Protection of Minors Personal Data**

**未成年人的個人資料保護**

1. MytePro attaches great importance to the protection of minors Personal Data. If you are a minor under the age of 18, you should obtain the prior consent of your parents or legal guardians before using our products and/or services. MytePro protects the Personal Data of minors in accordance with the relevant national laws and regulations.

MytePro非常重視對未成年人個人資料的保護。您若是18週歲以下的未成年人，在使用我們的產品與/或服務前，應事先取得您家長或法定監護人的同意。MytePro根據國家相關法律法規的規定保護未成年人的個人資料。

1. In cases where Personal Data of minors is collected with the consent of their parents or legal guardians, we will only use or publicly disclose such information as permitted by law, with the parents or guardians express consent, or as necessary to protect the minor.

對於經父母或法定監護人同意而收集未成年人個人資料的情況，我們只會在受到法律允許、父母或監護人明確同意或者保護未成年人所必要的情況下使用或公開披露此信息。

1. If we become aware that we have collected Personal Data from minors without first obtaining the verifiable consent of their parents or legal guardians, we will seek to delete the relevant data as soon as possible.

我們如果發現自己在未事先獲得可證實的父母或法定監護人同意的情況下收集了未成年人的個人資料，則會設法儘快刪除相關數據。

1. **Notifications and Revisions**

**通知和修訂**

1. In order to provide you with better service, this Privacy Policy will be updated along with the development of MytePro SaaS products and/or services. However, we will not reduce your rights under this Privacy Policy without your express consent. We will remind you of the update of the relevant content by issuing updated versions on, inter alia, MytePro SaaS products and/or services related website or client side and by website posting or other appropriate ways before the effective date. Please also visit the official website of MytePro to learn about the latest privacy policy in a timely manner.

爲給您提供更好的服務以及隨着MytePro SaaS產品及或服務的發展，本隱私政策也會隨之更新。但未經您明確同意，我們不會削減您依據本隱私政策所應享有的權利。我們會通過在MytePro SaaS產品及或服務所涉網站或客戶端等上發出更新版本並在生效前通過網站公告或以其他適當方式提醒您相關內容的更新，也請您訪問MytePro官方網站便及時瞭解最新的隱私政策。

1. For significant changes, we will also provide more prominent notice (we will indicate the specific changes to the privacy policy by means including, but not limited to, email, text message or special notification on the webpage being viewed).

對於重大變更，我們還會提供更爲顯著的通知（我們會通過包括但不限於郵件、短信或在瀏覽頁面做特別提示等方式，說明隱私政策的具體變更內容）。

The significant changes within the meaning of this Privacy Policy include, but are not limited to:

本隱私政策所指的重大變更包括但不限於：

1. significant changes to our service model. For example, the purposes for which Personal Data is processed, the types of Personal Data processed, how Personal Data is used etc.;

我們的服務模式發生重大變化。如處理個人資料的目的、處理的個人資料類型、個人資料的使用方式等；

1. significant changes in our ownership structure, organisational structure etc., such as changes in ownership due to business restructuring, bankruptcy, mergers and acquisitions;

我們在所有權結構、組織架構等方面發生重大變化。如業務調整、破產併購等引起的所有者變更等；

1. changes in major recipients to whom Personal Data is shared, transferred or publicly disclosed;

個人資料共享、轉讓或公開披露的主要對象發生變化；

1. significant changes in your right to participate in the processing of Personal Data and the manner in which such right is exercised;

您參與個人資料處理方面的權利及其行使方式發生重大變化；

1. changes in the department responsible for handling the security of Personal Data, our contact details and complaint channels; and

我們負責處理個人資料安全的責任部門、聯絡方式及投訴渠道發生變化時；以及

1. whenever a Personal Data security impact assessment report indicates that the risk is high.

個人資料安全影響評估報告表明存在高風險時。

1. We will also archive old versions of this Privacy Policy for your reference.

我們還會將本策略的舊版本存檔，供您查閱。

1. **How to Contact Us**

**如何聯繫我們**

1. We have set up a dedicated department for Personal Data protection, which is headed by our Data Protection Officer. If you have any questions, comments or suggestions regarding this Privacy Policy or matters relating to your Personal Data, please contact our dedicated Data Protection Officer by calling our customer service number (if applicable) (please refer to the customer service number applicable to you as set out in the relevant appendix) or sending an email to alan.he@mytepro.com.

我們設立了個人資料保護專職部門，由個人資料保護專員負責。如您對本隱私政策或您個人資料的相關事宜有任何問題、意見或建議，請通過撥打我們的客服電話（如適用）（請見附錄所列適用於您的電話號碼）或電郵至alan.he@mytepro.com與我們的個人資料保護專職專員聯繫。

1. In general, we will respond within fifteen (15) days. If you are not satisfied with our response, especially if our processing of Personal Data has harmed your legitimate interests, you may also file a complaint or report to the local governmental authorities responsible for Personal Data protection, Internet information, telecommunications, public security and industrial and commercial and other regulatory authorities, or file a lawsuit to the court of competent jurisdiction.

一般情況下，我們將在十五（15）天內回覆。如果您對我們的回覆不滿意，特別是我們的個人資料處理行爲損害了您的合法權益，您還可以向當地的負責個人資料保障的政府機關、網信、電信、公安及工商等監管部門進行投訴或舉報，或者向有管轄權的法院提起訴訟。

**We would like to remind you once again that you should** **read the terms highlighted in bold in this Privacy Policy carefully. By clicking or checking the “Agree” box and confirming your submission, you are deemed to have fully understood and agreed to the entirety of, and are committed to be bound by, this Privacy Policy.**

**我們謹此再次提醒您，本隱私政策內容中以加粗方式顯著標識的條款，請您着重閱讀。如您點擊或勾選“同意”並確認提交，即視爲您完全理解並同意本隱私政策的全部內容且承諾受本隱私政策之約束。**

**Appendix 1: Hong Kong Special Administrative Region of the People’s Republic of Hong Kong (“Hong Kong”)**

**附錄一：中華人民共和國香港特別行政區（“香港”）**

This appendix is applicable to you if the MytePro entity which collects and/or processes your Personal Data is located in Hong Kong.

如果收集和/或處理您個人資料的MytePro主體位於香港境內，則本附錄適用於您。

1. In respect of Hong Kong, the MytePro entity and/or the MytePro SaaS service provider relevant to you is MytePro Technology Limited.

就香港而言，與您相關的MytePro主體及/或MytePro SaaS服務提供者指MytePro Technology Limited。

1. In respect of Hong Kong, “Affiliates” mentioned in the main text above means affiliates and associated company. The term “associated company”, in relation to a body corporate, shall have the same meaning as currently defined in the Companies Ordinance (Cap. 622, Laws of Hong Kong).

就香港而言，上述主文“關聯方”指關聯方及有聯繫公司。“有聯繫公司”一詞與《公司條例》（香港法例第622章）所註釋的擁有相同的意思。

1. In respect of Hong Kong, “Personal Data” mentioned in the main text above means any data ——

就香港而言，上述主文“個人資料”的詳細定義爲符合以下說明的任何資料 ——

1. relating directly or indirectly to a living individual;

直接或間接與一名在世的個人有關的；

1. from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and

從該資料直接或間接地確定有關的個人的身分是切實可行的；及

1. in a form in which access to or processing of the data is practicable.

該資料的存在形式令予以查閱及處理均是切實可行的。

**Appendix 2: Republic of Singapore (“Singapore”)**

**附錄二：新加坡共和國（“新加坡”）**

This appendix is applicable to you if the MytePro entity which collects and/or processes your Personal Data is located in Singapore.

如果收集和/或處理您個人資料的MytePro主體位於新加坡境內，則本附錄適用於您。

1. In respect of Singapore, the MytePro entity and/or the MytePro SaaS service provider relevant to you is MytePro Technology Pte. Ltd. (UEN: 202332644H).

就新加坡而言，與您相關的MytePro主體及/或MytePro SaaS服務提供者指MytePro Technology Pte. Ltd. (唯一實體編號: 202332644H)。

1. In respect of Singapore, “Affiliates” mentioned in the main text above means affiliates and related corporations. The term “related corporation”, in relation to a corporation, shall have the same meaning as currently defined in the Companies Act 1967 of Singapore.

就新加坡而言，上述主文“關聯方”指關聯方及關聯企業。“關聯企業”一詞與新加坡《公司法1967》所註釋的擁有相同的意思。

1. In respect of Singapore, “Personal Data” mentioned in the main text above means data, whether true or not, about an individual who can be identified ——

就新加坡而言，上述主文“個人資料”的詳細定義爲無論資料是否真實，可以識別出具體個人身份的資料，即通過 ——

1. from that data; or

資料本身就可以識別個人身份；或

1. from that data and other information to which the organisation has or is likely to have access.

從資料及該組織已經擁有或可能知曉的其他信息中可以識別個人身份。

1. “Individual” means a natural person, whether living or deceased.

而“個人”是指自然人，無論是在世還是已故的。

1. In respect of paragraph I(4) of Section 1 of Part II, paragraph A(1)(5) of Section 3 of Part II and paragraph B(4) of Section 3 of Part II, we will comply with the relevant laws in Singapore governing the collection, use and disclosure of Personal Data without consent in order to protect the legitimate interests of a person other than the individual to which the Personal Data is about.

就第二部分第一章節第I（四）段、第二部分第三章節第A（一）（五）段及第二部分第三章節第B（四）段，我們會遵守新加坡有關於爲保護個人資料所涉及的個人以外的其他個人的合法權益而在未經同意的情況下收集、使用及披露個人資料的法律。

In respect of paragraph B(1) of Section 4 of Part II, we will take appropriate steps to ascertain whether, and to ensure that, the recipient of the Personal Data outside of your jurisdiction is bound by legally enforceable obligations to provide to the transferred Personal Data a standard of protection that is at least comparable to the protection under the Personal Data Protection Act 2012 of Singapore.

就第二部分第四章節第B（一）段，我們將採取適當措施以確定及確保處於您所屬的司法管轄區的境外地區的接收方有法定義務的約束以確保受傳輸的個人資料可以得到起碼與新加坡《個人資料保護法2012》同等標準的安全保護。

1. Other than the rights set out in paragraph 1 of Section 5 of Part II (Access and Correct Your Personal Data), you have the right to make an inquiry through sending an email to alan.he@mytepro.com with regards to whether we have used or disclosed your Personal Data in the past year.

除了第二部分第五章節第一段（查閱和更正您的個人資料）所列的權利之外，您有權透過電郵至alan.he@mytepro.com對於在過去一年裏我們是否曾經使用或披露您的個人資料提出查詢。

1. The contact number of our dedicated Data Protection Officer in Singapore is +65-89229468.

新加坡個人資料保護專職專員電話號碼爲+65-89229468。