

德中商务服务中心 Deutsch Chinesisches Business Center GmbH

客户数据隐私声明

English Version below

更新于 5 月 21 日

引言

德中商务服务中心 Deutsch Chinesisches Business Center GmbH (以下简称“DCBC”或“我们”) 对用户个人数据进行认真和恰当的处理是至关重要的。我们在处理您的个人数据时遵守数据保护法规和良好的数据管理和处理规范,并确保您的隐私不受影响。处理您的个人数据可以让我们更好地为您服务。我们收集和利用个人数据来生产产品和服务,并开发和提供新服务。这使我们能够更好地响应您的需求。我们可能会在我们开发服务或立法发生变化时定期更改我们的数据保护措施。您可以在此页面上找到我们数据保护实践的最新版本。

在本隐私声明中,我们会更详细地描述,例如:

- 收集有关我们的客户和我们网站用户的数据种类
- 服务
- 使用数据的目的
- 数据将被存储多长时间
- 服务中如何使用 Cookie
- 客户和用户影响的机会

我们建议用户阅读我们的隐私声明。用户同意本隐私声明的条款,进而使用我们的服务。

附加信息:

在处理客户的个人数据时,DCBC 始终遵守“通用数据保护条例”(GDPR)的基本原则:

- 个人数据必须以合法,公正和透明的方式进行处理与数据主体的关系(“合法性,公平性和透明度”)
- 必须收集个人数据以用于明确的,明确的和合法的目的,并且不得以与这些目的不相符的方式进行进一步处理(“目的限制”)
- 个人数据应充分,相关并限于与其处理目的相关的必要条件(“数据最小化”)
- 个人数据必须准确,并在必要时保持最新;必须采取每一个合理的步骤,以确保在考虑到处理目的的情况下删除或纠正不准确的个人数据(“准确性”)
- 个人资料的保存形式应允许识别资料的时间不超过处理个人资料所需的时间(“存储限制”)
- 个人数据的处理方式应确保使用适当的技术或组织措施(“完整性和保密性”)保护个人数据的适当安全性,包括防止未经授权或非法处理以及意外丢失,破坏或损坏。

我们收集个人数据的目的是什么?

我们收集您的个人数据,使我们能够为您提供高质量和个性化的产品和服务,以及更好的客户服务。我们希望不断提高质量和发展我们的业务。您的个人数据可能用于开发我们的产品,服务,客户服务,销售和营销。

我们还会将您的个人数据用于我们的用户沟通。例如,我们可能会向您发送有关我们产品和服务变更的公

告和通知。我们可能将您的个人数据用于产品和服务的市场营销以及市场调研，并且在您允许或允许的情况下进行。我们可能会进一步使用您的个人数据，将我们的产品和服务定位于您，例如，在我们的服务中推荐或展示有针对性的内容。

经您的同意并在法律允许的范围内，我们还可以将收集到的与我们的特定产品和/或服务相关的数据与收集到的与我们其他产品和/或服务相关的数据结合起来。

附加信息：

我们根据数据保护立法基于以下理由处理数据：

- 合同：我们处理您提供的数据以执行合同服务或向您提供您已订购的产品或服务。
- 同意：我们可能会在您同意的基础上处理您提供的数据或观察到的数据，或者根据以下所述的合法利益处理市场营销措施等。我们也可能在加工目的发生变化的情况下要求您的同意。
- 合法利益：我们处理您的数据以管理和开发客户服务，确保客户活动，实施服务，开展业务，预防和检测滥用行为以及进行市场营销。我们认为这些目标对我们的业务至关重要，因此符合我们的合法利益。
- 法定义务：我们可能有义务存储您的一些个人信息以遵守会计或其他立法。在这种情况下，处理您的个人数据是基于遵守法定义务。

我们收集哪些数据？

我们只收集您预先确定目的所需的个人资料。目的是定义收集什么样的数据以及在哪些情况下。在我们收集个人数据时，我们会告诉您需要哪些数据才能使用该服务以及您可以同意提供哪些数据。

用户提供的数据或个人识别信息：我们收集用户提供的数据，例如为了交付和开具订单或服务的发票，管理和开发客户账户以及进行市场营销和民意调查。如果没有联系或开具发票数据，我们无法提供用户订购的产品或服务。我们也可能收集其他用户数据，以调整我们的内容和营销以更好地符合客户的偏好。

以下是用户提供的数据或以其他方式个人识别的信息的示例：

- 与识别和认证一个人有关的数据，例如姓名和个人身份代码
- 联系方式，例如姓名，地址，电话号码，电子邮件地址
- 有关客户关系的信息，例如发票和付款信息，产品和订单信息，客户反馈，查询和取消信息
- 分析用户提供的信息和兴趣
- 用户许可和同意
- 在问卷和调查中输入数据
- 履行法律义务所需的数据
- 经用户同意收集的其他信息

通过使用服务观察到的数据：

我们通过 Cookie 和类似技术自动收集数据，这有助于我们了解我们服务的用户数量，受欢迎的内容和广告以及用户花费多少时间查看内容和广告。这些数据有助于我们发展我们的服务和业务，根据用户可能感兴趣的领域定制内容，针对广告和营销传播以及防止和检测滥用行为。

这些数据包括，

- 使用和浏览与服务功能相关的数据
- 用户访问我们网站以及网站版本
- 使用的设备类型
- 个人设备和/或 Cookie ID
- 浏览器和浏览器版本
- IP 地址

- 浏览的时间和持续时间
- 操作系统
- 经用户同意收集的其他信息

使用服务导出的数据：

通过使用分析，我们可以基于通过服务观察到的数据和/或由用户自己给出的数据来确定，例如，用户感兴趣的可能区域，并将用户分成特定的一组用户。我们使用这些数据进行统计和分析，开发服务和业务，并定制内容，广告和营销信息。

如果我们将数据用于上述以外的目的，我们确保处理与最初收集数据的目的兼容。

我们如何收集个人资料？

我们主要直接从用户那里收集个人资料，无论是口头还是书面。用户的个人数据是在其成为我们网站的客户时收集的，涉及销售和使用产品和服务，也与市场营销活动以及用户与我们开展业务相关。用户向我们提供数据，例如，当其请求服务时，参与调查或广告系列或回答与我们提供的服务相关的问题。数据也可以通过使用服务来观察或推导出来。数据可能由我们或我们的合作伙伴通过任务收集。

此外，我们从信用信息和客户默认登记簿以及其他可靠的公共或私人登记簿，例如，商业信息系统。

我们可能会在我们的网站上使用 cookie（存储在设备中的小文本文件），以确保我们的服务尽可能地正常工作。

Cookies 的使用：

我们使用 Cookie（存储在设备中的小文本文件）来提供和开发我们的服务。我们还使用 Cookie 来个性化内容和目标广告。Cookies 为我们提供了更好的机会，可以根据用户的兴趣向用户展示最新的个性化服务。Cookies 还支持以下功能：登录和身份验证，个人设置和规格的保存，网站运行分析以及防止欺诈。当您使用我们的网络服务时，Cookie 会收集例如以下数据：IP 地址，您使用的链接，您浏览的广告和其他内容，您之前浏览的网站和您访问的网站，您访问的时间，您正在使用的浏览器或应用程序以及其他类似信息。我们的网站和服务可能包含第三方会话 cookie。

我们使用会话 cookie 和永久性 cookie。会话 cookie 是临时的，即它们仅在您访问网站时才存在，并在您关闭浏览器时自动删除。持续 cookie 保留一段时间，即使在会话结束后也会保存在电脑中，除非您在此之前自行删除它们。Cookies 不会损害您的设备或文件。您可以调整您的 Cookie，例如通过浏览器设置。有关 cookie 的更多信息包含在每个浏览器的数据保护或说明文档中。

我们如何处理您的个人资料？

我们根据“通用数据保护条例”（GDPR）处理您的个人数据，尊重您的权利和自由。我们确保在个人数据处理的各个阶段符合数据保护原则。

您的数据只能由 DCBC 的员工或有权处理个人数据的合作伙伴处理。我们通过不断的培训和最新的指导方针，确保员工的数据保护意识和知识。您的个人数据可能由 DCBC 或其合作伙伴管理的多个 IT 系统进行处理。

我们如何保护您的个人资料？

就个人数据处理而言，我们为实施数据保护原则制定了适当的技术和组织措施。这些措施包括使用防火墙，加密技术，安全使用 IT 领域，适当的访问控制，限制授予用户权限并监控其使用，向参与个人数据处理的人员以及认真选择分包商提供说明。

我们向谁透露您的个人资料？

原则上，我们不会透露您的个人资料。DCBC 可能会向合作伙伴购买某些个人数据处理服务。我们仅选择了个人数据处理机构作为我们的合作伙伴，这些个人数据处理机构遵守良好的个人数据处理规范，采用适当的技术和组织措施，满足 GDPR 的要求并能够确保行使您的权利。

与所有合作伙伴签订书面合同，明确个人数据处理的对象，目的和持续时间，以及要处理的商定个人数据。此外，根据主管当局或其他方面的法定要求，个人数据在特定时间基于现行立法进行披露。

我们是否在欧盟或欧洲经济区之外披露您的个人数据？

原则上，我们只在欧盟或欧洲经济区内处理您的个人资料。

在某些特殊情况下，如果我们将个人数据转移到欧盟或欧洲经济区以外，我们会确保提供充分的个人数据保护，除其他外，以个人数据的保密和处理方式 例如使用欧盟委员会批准的标准合同条款进行立法，否则将根据本隐私声明处理个人数据。

我们保留您的个人资料多久？

个人数据的存储期限基于法律和 DCBC 的数据保护原则。根据当时有效的法律，我们仅保留您在本隐私声明中所述目的所需的数据。只要客户关系持续，我们就会存储您的数据。客户关系结束后，存储期限取决于数据及其用途。在客户关系结束或处理个人数据的其他理由结束之后，我们可能有义务存储一些客户的个人数据，以便遵守会计或其他立法。

我们通过清除不必要的数据和更新过时的数据，努力保持我们掌握的个人数据的正确性和最新性。

客户的权利

您有权访问与您有关的数据，要求纠正不准确或不完整数据的权利，以及删除在处理目的方面不必要或过时的注册数据的权利。

您也有权通过联系控制器或更改 Web 服务中的设置，反对我们在直接营销和市场调查以及意见调查中使用的您数据。根据您的网页浏览行为，您也可以屏蔽针对您的广告。在这种屏蔽之后，您将会看到与之前相同的广告数量，但广告不会根据您的感兴趣区域进行定位。

客户有权访问数据

根据 GDPR，您有权收到涉及您的个人资料的副本。没有法律规定的表格针对提出此请求。如有需要，我们可能会要求您提供更多数据以确认您的身份。

如果您以电子方式提出有关权利的请求，我们将以常用电子格式提供数据。原则上，完成请求不收取任何费用，但在某些情况下，我们可能会收取执行请求的程序所产生的行政费用，或者我们可能拒绝执行请求的程序。

根据 GDPR，回复您提出的要求的期限为一个月。如有必要，这个时限可以延长不超过两个月，同时考虑到请求的复杂性和数量。

纠正的权利和“被遗忘的权利”

除了某些例外情况，GDPR 保证您有权纠正您的数据，并有权删除您的个人数据，即“被遗忘的权利”。您也有权取消您处理所依据的同意书。在这种情况下，您可以向我们提出删除系统中涉及您的数据的请求。如果没有其他法律依据来处理个人资料，我们会将其删除。如果我们的合作伙伴拥有要纠正或删除的数据，我们会要求合作伙伴遵循相同的程序。

您的数据从一个系统到另一个系统可移植性的权利

在 GDPR 下，您有权将数据从一个系统移植到另一个系统。实际上，您有权以常用的传输格式获取有关

您的数据并将其交付给其他控制器。 法律要求处理是基于同意或协议，并且自动化处理。

您有权反对处理，自动决策和分析

您有权根据您的具体情况在任何时候反对处理与您有关的个人数据。 这一权利不涉及公共部门登记册，这些登记簿依法保存。

您有不接受仅基于自动化处理(如分析)并且产生与您有关的法律影响或类似地严重影响您的决定的权利。

您有权收到违反您个人资料的通知

我们被要求将个人数据泄露直接传达给违规数据涉及的数据主体。 如果违规行为可能给个人的权利和自由带来高风险，例如以身份盗用，欺诈交易或其他犯罪活动的形式，则该权利生效。

联系我们

有关个人数据处理的任何查询和请求，您可以发邮件至：info@dbc.eu

Customer Data Privacy Statement

Updated 21 May 2018

Introduction

The careful and appropriate processing of your personal data is of primary importance to the Deutsch Chinesisches Business Center GmbH (hereinafter referred to as “**DCBC**” or “**We**”). We comply with data protection legislation and good data management and processing practices when processing your personal data, and we make sure that your privacy is not compromised.

Processing your personal data allows us to serve you better. We collect and utilize personal data to produce products and services and to develop and offer new services. This allows us to better respond to your needs.

We may periodically change our data protection practices as we develop our services or as legislation changes. You can find the latest version of our data protection practices on this page. In this Privacy Statement, we describe in greater detail, for instance:

- the kind of data that is collected about our customers and the users of our web services
- the purpose for which the data is used
- how long the data will be stored
- how cookies are used in the service
- the opportunities of the customer and the user to influence

We recommend reading our Privacy Statement. By using our services, the user agrees to the terms of this Privacy Statement.

Additional information:

When processing our customers’ personal data, we always comply with the basic principles of the General Data Protection Regulation (GDPR):

- personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject (“Lawfulness, fairness and transparency”)
- personal data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (“purpose limitation”)
- personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (“data minimization”)
- personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (“accuracy”)
- personal data shall be kept in a form which permits identification of data subjects for no longer

than is necessary for the purposes for which the personal data are processed ("storage limitation")

- personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ("integrity and confidentiality")

For what purposes do we collect personal data?

We collect your personal data to enable us to offer you high-quality and personalized products and services, as well as better customer service. We want to continuously improve quality and develop our operations. Your personal data may be used to develop our products, services, customer service, sales and marketing. Your personal data may be used to offer products and services, to respond to your requests and enquiries, to activate sales and purchase agreements, to process orders and to complete other similar activities.

We also use your personal data for our customer communications. We may, for example, send you bulletins and notifications of a change concerning our products and services. We may use your personal data for product and service marketing and for market research with your permission or when otherwise allowed. We may furthermore use your personal data to target our products and services to you, for example, by recommending or displaying targeted content in our service.

With your consent and to the extent permitted by law, we may also combine the data collected in connection with a certain product and/or service of ours with the data collected in connection with our other products and/or services.

Additional information:

We process data on the following grounds based on data protection legislation:

- Contract: We process the data you provide in order to perform a contractual service or to provide you with a product or service you have ordered.
- Consent: We may process the data you provide or observed data with your consent or, based on the legitimate interest mentioned below, for marketing measures, among other things. We may also request your consent in a situation where the purposes of the processing would change.
- Legitimate interest: We process your data to manage and develop customer service, to ensure customer events, to implement services, to develop the business, to prevent and detect abuse and for marketing. We consider these purposes to be essential to our business and thus in line with our legitimate interest.
- Statutory obligation: We may be obligated to store some of your personal data in order to comply with accounting or other compelling legislation. In such cases, the processing of your personal data is based on compliance with a legal obligation.

What data do we collect?

We collect from you only personal data that is necessary for a pre-determined purpose. The purpose defines what kind of data is collected about you and in which situations. As we collect personal data, we tell you what data is required in order to use the service and what data you can consent to give.

Data given by the user or personally identifying information: We collect data given by users, for instance, in order to deliver and invoice an order or service, to manage and develop a customer account, and for marketing and opinion surveys. Without contact or invoicing data, we cannot deliver a product or service that a customer has ordered. We may also collect other user data in order to tailor our content and marketing to better correspond to the customer' s preferences. The following are examples of data given by the user or information that is otherwise personally identifying:

- data related to identifying and authenticating a person, such as name and personal identity code
- contact details, such as name, address, phone number, email address
- information concerning the customer relationship, such as invoicing and payment information, product and order information, customer feedback, enquiries and cancellation information
- profiling information and interests given by the user
- permissions and consent
- data about the blocking of offers
- data entered in questionnaires and surveys
- data required to fulfil legal obligations
- other information collected with the user' s consent

Data observed through use of the services: We automatically collect data through cookies and similar technology which helps us to understand the number of users our services have, the content and ads that are popular, and how much time users spend looking at content and ads. This data helps us develop our services and our business, tailor content according to users' probable areas of interest, target advertising and marketing communications and prevent and detect abuse. This data includes, e.g.

- usage and browsing data related to the features of the service
- the website from which the user accesses our website
- the type of device used
- an individual device and/or cookie ID
- the browser and browser version
- the IP address
- the time and duration of the session
- the operating system
- other information collected with the user' s consent

Data derived from use of the services: With the use of analytics, we can determine based on the data observed through the services and/or the data given by the user him-/herself, e.g. the possible areas of interest to the user, and segment the user into a specific group of users. We use the data for statistics and analyses, to develop services and business and to tailor content, advertising and marketing messages. If we use data for purposes other than what is mentioned above, we make sure that the processing is compatible with the purpose for which the data was originally collected.

How do we collect personal data?

We collect your personal data primarily directly from you, either orally or in writing. Your personal data is collected, e.g., when you become our customer, in connection with the sale and use of products and services, in connection with marketing campaigns or surveys and when you otherwise do business with us. You give us data, e.g. when you request services, participate in surveys or campaigns or answer questions in connection with the services we offer. The data may also be observed or derived from the use of the services. The data may be collected by us or our partners through an assignment.

In addition, we obtain data from registers maintained by authorities, from credit information and customer default registers and other reliable public or private registers, e.g. the Business Information System. We may use cookies (small text files stored in a device) on our website to ensure that our service works as well as possible.

Use of cookies:

We use cookies (small text files stored in a device) in offering and developing our services. We also use cookies to personalise content and target advertising. Cookies give us better opportunities to, among other things, offer up-to-date and personalised services by showing users content based on their interests. Cookies also enable the following: logging in and authentication, the saving of personal settings and specifications, the analysis of the functioning of our websites, and the prevention of fraud. When you use our web services, cookies collect, e.g., the following data: the IP address, the links you use, the ads and other content you browse, the website you browse before and the website you visit, the time of your visit, the browser or app you are using, and other similar information. Our website and service may contain third-party session cookies. We use session cookies and persistent cookies. Session cookies are temporary, i.e. they exist only when you visit the website and are automatically erased when you close your browser. Persistent cookies remain for a certain period of time and are saved in the computer even after the session ends, unless you delete them yourself before then. Cookies do not harm your device or your files. You can adjust your cookies, e.g., through your browser settings. More information about cookies is contained in the data protection or instruction documentation of each browser.

How do we process your personal data?

We process your personal data in compliance with the General Data Protection Regulation (GDPR), in a manner that respects your rights and freedoms. We ensure compliance with data protection principles in all stages of personal data processing. Your data is processed only by employees of

the DCBC or its partners who have the right to process personal data. We ensure the data protection awareness and knowledge of personnel through continuous training and up-to-date guidelines.

Your personal data may be processed in several IT systems that are administered by either DCBC or its partners.

How do we protect your personal data?

In connection with personal data processing, we have produced appropriate technical and organizational measures for the implementation of data protection principles. Such measures include the use of firewalls, encryption technology, secure use of IT areas, appropriate access control, restricted granting of user rights and monitoring of their use, providing instructions to personnel participating in personal data processing and careful selection of subcontractors.

To whom do we disclose your personal data?

In principle, we do not disclose your personal data.

DCBC may purchase certain personal data processing services from partners. We have chosen as our partners only personal data processors that abide by good personal data processing practices, using appropriate technical and organizational measures, and which fulfil the requirements of the GDPR and are capable of ensuring the exercising of your rights.

A written contract is concluded with all partners, specifying the object, purpose and duration of the personal data processing, as well as the agreed personal data to be processed. In addition, personal data is disclosed in a manner based on legislation in force at a given time, according to the statutory requirements of the competent authorities or other parties.

Do we disclose your personal data outside the EU or EEA?

In principle, we only process your personal data within the EU or EEA.

If, in certain exceptional cases, we transfer the personal data outside the EU or EEA, we ensure a sufficient level of personal data protection by, among other things, agreeing on matters related to the confidentiality and processing of personal data in the manner prescribed by legislation, for example, using the standard contractual clauses approved by the European Commission, and otherwise so that the processing of personal data takes place in accordance with this Privacy Statement.

How long do we keep your personal data?

The storage periods for personal data are based on legislation and on DCBC' s data protection principles. We retain your data only for as long as is necessary for the purposes stated in this Privacy Statement in accordance with the legislation in effect at the time.

We will store your data for at least as long as the customer relationship lasts. After the customer relationship ends, the storage period depends on the data and its purpose. We may be obligated to store some of the customer' s personal data in order to comply with accounting or other compelling legislation also after the customer relationship ends or other grounds for processing

personal data end. We endeavor to keep the personal data that is in our possession correct and up to date by erasing unnecessary data and by updating obsolete data.

Your right as our customer

You have the right to access data that concern you, the right to demand that inaccurate or incomplete data are rectified, and the right to have register data that are unnecessary or obsolete in terms of the processing purpose erased. You also have the right to object to your data being used in direct marketing and market research and in opinion surveys by contacting the controller or by changing the settings in the web service. You can also block advertising that is targeted to you based on your web browsing behavior. After such blocking, you will be shown the same number of ads as before, but the advertising will not be targeted based on your areas of interest.

Your right to access data

Under the GDPR, you have the right to receive a copy of the personal data that concerns you. There is no legally prescribed form for presenting this request. If necessary, we may ask you for additional data in order to confirm your identity. If you present a request concerning a right electronically, we will deliver the data in a commonly used electronic format. In principle, there is no charge for fulfilling requests, but under certain conditions, we may charge administrative costs arising from performing the requested procedure or we may decline to perform the requested procedure.

Under the GDPR, the time limit for replying to a request made by you is one month. This time limit may, if necessary, be extended by no more than two months, taking into account the complexity and number of requests.

Your right to rectification and right to be forgotten

With certain exceptions, the GDPR guarantees you the right to have your data rectified and the right to the erasure of your personal data, i.e. "the right to be forgotten" . You also have the right to cancel your consent on which the processing is based. In this case, you can present us with a request to erase the data that concerns you from our systems. If there are no other legal grounds for processing the personal data, we will erase it. If a partner of ours is in possession of your data that is to be rectified or erased, we will request that the partner follow the same procedure.

Your right to data portability from one system to another

Under the GDPR, you have the right to data portability from one system to another. In practice, you have the right to obtain data that concerns you in a commonly used transmission format and deliver it to another controller. The law requires that the processing be based on consent or an agreement, and that the processing be automated.

Your right to object to processing, automatic decision-making and profiling

You have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data that concerns you. This right does not concern public-sector registers,

which are kept by law. You have the right not to be subject to a decision which is based solely on automated processing, such as profiling, and which produces legal effects concerning you or similarly significantly affects you.

You have the right to receive notification of a breach of your personal data

We are required to communicate a personal data breach directly to the data subjects whose data the breach concerns. The right takes effect if the breach is likely to cause a high risk to the rights and freedoms of the individual, for example, in the form of identity theft, fraudulent transactions or other criminal activity.

Who can I contact?

Present any enquiries and requests you have concerning personal data processing first to the controller at the address: info@dcbc.eu