

# Privacy Policy of UnionPay International's 360 Workshop

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## Article 1 Overview

This Privacy Policy ("Privacy Policy" or "Policy") explains why and how UnionPay International Co., Ltd. ("UnionPay International" or "We") handles your personal data when you log in and use UnionPay International's 360 Workshop as well as its related services. To use UnionPay International's 360 Workshop services, you need to agree to this Privacy Policy.

(I) What is "personal data" or "personal information"?

"Personal information" refers to any information that is directly or indirectly linked to an identified or identifiable personal identity.

(II) What is "UnionPay International"?

UnionPay International is a company established in accordance with the laws of the People's Republic of China ("PRC"), with the registered address:

Floor 9, No. 1899 Guozhan Road, China (Shanghai) Pilot Free Trade Zone.

It is a multinational company with branches and offices in many countries and regions across the world.

If you have any questions about data protection, you can [contact](mailto:360workshop@unionpayintl.com) us by email at 360workshop@unionpayintl.com.

(III) Why does UnionPay International need to process personal data?

As a card scheme, UnionPay International provides payment-related services and processes payment transactions.

(IV) What role does UnionPay International play when processing your personal data?

UnionPay International determines the purposes and methods of processing your personal data. This Privacy Policy is intended to explain how such personal data is used.

(V) What key information is contained in this Privacy Policy?

You will learn about the relevant information concerning our processing of your personal data, the purposes processing such data, and your rights. For any matters not covered in this Privacy Policy, you can refer to the UNIONPAY INTERNATIONAL PRIVACY NOTICE displayed on the UnionPay International website.

(VI) Under specific circumstances, we, as the data processor, process relevant transaction information in accordance with the instructions of UnionPay International members and/or other partners as data controllers. For more information about the processing of your personal information under the preceding circumstances, please refer to the respective privacy policies of the data controllers.

## Article 2 Purposes of Personal Data Processing and Business Functions

You will find that UnionPay International may process your personal information for the following purposes:

- Creating and managing your account in this Portal;
- Contacting you through the contact person's information provided by you;
- Internal research, reporting and analysis;
- Compliance with applicable laws, regulations and law enforcement requests.

### **Article 3 Types of Personal Data We Collect and Process**

The types of personal data we will collect and process include:

When you log in to the 360 Workshop, the personal data we will collect are contact person from UPI Members, Special Participants, Third Party Service Provider ("TPSP") or other partners who are in the process of application or are interested in this Service, including name, country/region, company name, IIN, prefix and email address.

### **Article 4 Legal Basis for Personal Data Processing**

The following is the legal basis for personal data processing by UnionPay International:

- (I) Process your personal data for one or more specific purposes with your consent (for example, direct marketing);
- (II) Comply with laws that apply to us worldwide; and/or
- (III) We have legitimate rights and interests in processing your personal data, unless your rights and interests take precedence over those rights and interests (for example, compliance with foreign legal obligations, internal research, reporting, and analysis).

### **Article 5 Your Rights**

Depending on the applicable laws in different countries, you may have the following rights:

#### **Access your personal data**

(I) We understand that you may want to know what kind of personal data we have stored about you. We are happy to provide timely assistance. However, to protect your personal data, we probably will ask you to prove your identity to us at the time of your request.

(II) UnionPay International reserves the right to refuse your request for access to your personal data under specific circumstances permitted by law. If your personal data is not disclosed to you, we will explain to you the reason for the non-disclosure.

#### **Other Rights**

Depending on the country or region where you are located, you also have the right to:

1. Refuse personal data processing by UnionPay International;
3. Request personal data processing restrictions;
4. Request personal data correction and/or deletion;
5. Withdraw your consent for personal data processing by UnionPay International (in cases where UnionPay International processes your personal data with your consent);
6. Complaints;
7. You can contact us by email at [360workshop@unionpayintl.com](mailto:360workshop@unionpayintl.com) to delete your 360 Workshop account.

8. When you are given the option to choose whether to share your personal data with UnionPay International, you are able to refuse such sharing.

You always have the right to accept or reject future marketing communications from us. If you refuse to allow us to process your personal data, or you have already consented to personal data processed by us but subsequently decided to withdraw that consent, we will respect your decision.

This may mean that we will be unable to perform the necessary operations to achieve the purposes of personal data processing as described above, and you may be unable to use our services.

After you choose to withdraw your consent, UnionPay International maintains the right to continue processing your personal data within the scope required or permitted by law.

If you wish to execute any of the above rights at any time, or have any question, suggestion or complaint, you can contact us by email at [360workshop@unionpayintl.com](mailto:360workshop@unionpayintl.com).

## **Article 6 How We Share and Transfer Your Personal Data**

Your personal data will not be shared and transferred to any third parties.

## **Article 7 Security**

Appropriate technical and internal management measures have been implemented to protect your personal data, including but not limited to:

(I) In terms of internal management policy, we have adopted a data classification and grading system in accordance with different level of sensitivity and type, based on which we have imposed limitations on user permissions, usage scenario permissions, usage authorization and approval mechanisms.

(II) In terms of techniques, we adopted irreversible encrypted storage and isolated storage, adopted de-identification technique during information display and download, and dedicated line transmission, encrypted transmission, secret key, isolated transmission of data medium as well as other techniques to ensure the security of your personal data.

(III) After a personal information security incident occurs, we will inform you of the following content in accordance with applicable laws: the basic information and possible impact of the incident, the measures we have taken or will take, the suggestions that help you prevent and mitigate risks, and the remedial measures for you. We will also report the handling progress of personal information security incidents as required by regulatory authorities.

## **Article 8 Cookies**

(I) To provide you with smoother and easier experience, we may identify you by using a small data file "Cookie" when you sign up for any UnionPay Promotion Campaign to help you reduce the times and frequency of information input or determine the security status of your account. Cookies usually contain identifiers, site names, numbers, and characters. By using Cookies, websites can store data such as your preferences.

We will not use Cookies for any purposes other than those stated in this Privacy Policy. The Cookie that stores your data is unique. Most web browsers have the function of blocking Cookies, which can only be read by the web server that publishes the Cookies to your domain. You can manage or delete Cookies according to your preferences and clear all Cookies saved on your device at any time. If you clear, you must complete user settings again each time when you use your device to visit related websites.

(II) In addition to Cookies, we also use the electronic image technology called Web Beacon. We may use Web Beacon to collect statistics on anonymous access, which are used to calculate the number of user visits, stay time, accessed page URLs, and display settings in order to provide you with more personalized services. These statistics do not include your personal information.

### **Article 9 Data Storage**

(I) We will store your personal data within the territory of the People's Republic of China **within the period required by applicable laws.** This may involve the storage of information after your transaction is completed. UnionPay International is a multinational company with branches in many countries and regions around the world. Therefore, it may transmit your personal information to China and other countries and regions. Such cross-border transmission is necessary for UnionPay International to provide relevant services. Compliance with additional legal requirements is required when your personal information is transmitted to or accessed from other countries and regions. UnionPay International will transmit personal information to other countries and regions only when such transmission complies with applicable personal information protection laws.

(II) To determine a storage period for your personal data, we will comprehensively consider the usage and function of the information, the types of products and services, and the storage period requirements stipulated by applicable laws and regulations.

### **Article 10 Protection of Minors**

(I) Our website and services are mainly targeted at the adults, so we presume that you have the corresponding civil capacity for your sign up for any UnionPay Promotion Campaign. If you are a minor in accordance with provisions of your country/region, we require you to ask your parents or other guardian to read this Privacy Policy carefully, and use our services or provide information to us with the consent of your parents or guardian. If we find that we have collected minor's personal information without the prior consent of verified parents, we will try to delete the relevant data as soon as possible.

(II) In the case of collecting personal information of minors who use our products or services with the consent of their parents or other guardians, we will only use, share, transmit, or disclose such information as permitted by laws and regulations, explicitly agreed by their parents or other guardians, or necessary to protect minors.

(III) If you are the parent or guardian of a minor, please pay attention to whether the minor under your custody uses our services after obtaining your authorization and consent. If you have any questions about the personal information of the minor under

your custody, please contact us by using the contact information stated in this Privacy Policy.

### **Article 11 Links to Other Websites**

You may find links to other companies' websites on some pages. Since this Privacy Policy does not apply to the personal data processed by other websites/links, and UnionPay International is not responsible for personal data processed by external websites, we recommend that you read the privacy policies of these websites, links, or applications.

### **Article 12 Changes to the Privacy Policy**

We will update this Privacy Policy from time to time, especially in response to changes in laws, regulatory guidelines, or internal policies of UnionPay International. If we need to change or extend the purposes of personal information processing, we will provide you with the updated Privacy Policy in time. In the event of major changes to this Privacy Policy, we will publish a notice on our website, and may seek your respective consent under specific circumstances.

The circumstances that constitute major changes include but are not limited to:

1. Major changes have taken place in the scope and mode of services provided by us, such as the purposes of collecting and using personal information, the types of processed personal information, and the ways of using personal information;
2. Major changes have taken place in our business entity, organizational structure, and ownership structure, such as changes in owners due to business adjustment, merger, acquisition, and reorganization;
3. Major changes have taken place in your right to participate in personal information processing and the way in which you exercise the right;
4. Changes have taken place in the ways and main objects of personal information sharing, transmission, or public disclosure;
5. Changes have taken place in our department responsible for personal information security and its contact information and complaint channels;
6. Other changes that may have a significant impact on your rights and interests of personal information.

### **Article 13 Contact Us**

(I) If you have any questions about data protection, you can contact us by email at [360workshop@unionpayintl.com](mailto:360workshop@unionpayintl.com).

(II) If you are not satisfied with our reply, especially if our personal information processing behavior has infringed your legitimate rights and interests, you can file a complaint or report.