

# UNIONPAY INTERNATIONAL

## PRIVACY NOTICE

Effective Date: 2020-10-13

### 1. IN A NUTSHELL

This privacy notice (the “**Privacy Notice**” or “**Notice**”) explains why and how UnionPay International 360 Workshop Portal (“**UPI**” or “**the Portal**”) may process your personal data.

- **What does “personal data” mean?**

Personal data means any information that can be linked directly or indirectly to identified or identifiable individuals.

- **Who is UPI?**

UPI is a company incorporated under the laws of the People’s Republic of China (“**PRC**”) with its registered office at Floor 2-7, No.6 Dongfang Road, Pudong New District, Shanghai, PRC.

UPI is an international company established in numerous countries/regions across the world.

If you have any questions in relation to data protection matters, you can write to us at the abovementioned address or mail us at [360workshop@unionpayintl.com](mailto:360workshop@unionpayintl.com).

- **What is the key information contained in this Privacy Notice?**

You will find relevant information on the personal data we process about you, the purposes and your rights.

### 2. THE CATEGORIES OF DATA SUBJECTS AND OF PERSONAL DATA WE PROCESS ABOUT YOU

The main types of personal data we process are the following:

- Personal data of 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, prefix and email address.

### 3. THE PURPOSES OF THE PROCESSING OF YOUR PERSONAL DATA

You will find below the main purposes for which UPI processes personal data:

- Creating and managing your account in this Portal;
- Contacting you through the contact person’s information provide by you;
- Providing UPI Members, Special Participants and TPSP the channels to contact you through the contact person’s information provide by you;
- Internal research, reporting and analysis;

- Compliance with applicable laws, regulations and law enforcement requests.

#### **4. YOUR RIGHTS**

Depending on where you are located, you may have the right to:

##### **Accessing your personal data**

We understand that you may like to know what personal data we retain about you. We are happy to assist you with your request as soon as we can. To protect your personal data, however, we will probably require that you prove your identity to us at the time your request is made.

UPI reserves the right to decline access to your personal data under certain circumstances as permitted by law. If your personal data is not disclosed to you, you will be provided with the reasons for this non-disclosure.

##### **Other rights**

You may also be entitled to:

- object to the processing of your personal data;
- opt out from processing of your personal data for direct marketing purposes;
- request the restriction of the processing of your personal data;
- request the correction and/or deletion of your personal data;
- withdraw your consent to the processing of your personal data (where UPI is processing your personal information based on your consent);
- request the receipt or transmission to another organisation, in machine-readable form, of the personal data you may have provided to UPI;
- object to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.
- lodge a complaint with a supervisory authority; and

Where you are given the option to share personal data with UPI, you can always choose not to do so.

If you do not wish to receive marketing information from UPI, you may mail us at [360workshop@unionpayintl.com](mailto:360workshop@unionpayintl.com). You will always have the ability to accept or decline any form of communication from UPI. You may unsubscribe from electronic marketing communications at any time by selecting the “unsubscribe” link included in such communications.

If you object to the processing of your personal data, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice.

This could mean that we will be unable to perform the actions necessary to achieve the purposes of processing data for you as described above (see article 3) and that you may be unable to use our services.

After you have chosen to withdraw your consent, UPI may be able to continue to process your personal data to the extent required or otherwise permitted by law.

Those rights may be limited in some circumstances by local law requirements. If at any time you wish to exercise any of these rights, you can do so by mailing us at 360workshop@unionpayintl.com.

## **5. THE RECIPIENTS OF YOUR PERSONAL DATA AND CROSS-BORDER TRANSFERS**

The recipients of your personal data are:

- UPI's staff, establishments and affiliates;
- UPI's processors and other contractors, suppliers and service providers;

Such recipients shall undertake all necessary measures to keep your personal data confidential.

Additional requirements apply when your personal data is transferred to (or accessed from) another country/region. UPI only transfers personal data to another country/region where that transfer complies with data protection law.

UPI is based in the People's Republic of China and operates a global payment network with affiliates and service providers located outside of your country/territory of residence. As a result, UPI may instruct affiliates and/or service providers located worldwide to process any personal data collected by UPI at any time after it is collected. Such cross-border transfer is necessary for UnionPay services. Regardless of where your personal data is transferred, we will protect it in accordance with this Privacy Notice and applicable law.

## **6. DIRECT MARKETING**

UPI may use your personal data (including your contact numbers) for direct marketing to you. This includes sending you marketing communications about updates, latest offers and promotions in relation to the goods, services or activities of UPI (or by an agent on behalf of UPI) or, as appropriate, its affiliates and those other companies with whom UPI has joint-marketing arrangements, whether they are available through it or otherwise. UnionPay may not so use or provide your personal data except permitted by applicable law or it has received your consent.

These communications may be sent by mail, SMS and email, in accordance with applicable laws. You may opt-out of receiving marketing communications from UPI at any time by:

- mailing us at 360workshop@unionpayintl.com, or
- using opt-out facilities provided in marketing communications.

UPI will then take all reasonable steps to remove your name from the mailing list.

## **7. SECURITY**

Appropriate technical and organisational measures have been implemented to prevent from unauthorised or unlawful processing of your personal data and against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed, including but not limited to:

1. In terms of internal policy, we have adopted a data classification and grading system, based on which we have imposed limitations on user permissions, usage scenario permissions and approval mechanisms.
2. In terms of techniques, we adopted irreversible encrypted storage and isolated storage, adopted de-identification technique during information display, and dedicated line transmission, encrypted transmission, isolated transmission as well as other techniques to ensure the security of your personal data.
3. If a data breach occurs, we may communicate the data breach to you and notify it to the supervisory authorities in accordance with the requirements of applicable laws.

## **8. COOKIES**

In order to ensure that you have a smoother and more relaxed experience, when you use the service provided by UPI, we may identify you through a small data file "Cookie" to help you reduce the number and frequency of information entry, or assist determining the security status of your account. Cookies usually contain identifiers, site names, and some numbers and characters. With the help of cookies, websites can store data such as your preferences.

We will not use cookies for any purpose other than the purposes described in this policy. Most web browsers have the function of blocking cookies. You can manage or delete cookies according to your preferences, and you can clear all cookies saved on your device at any time. If you choose to clear it, you need to reset the user settings every time you use your device to visit related websites and browse products.

In addition to cookies, we may use Web Beacon to collect statistics about anonymous visits to calculate the number of user visits, stay time, page addresses visited, display settings, etc., so that you can enjoy more personalized services, and these statistics do not include your personal data.

## **9. DATA RETENTION**

Your personal data will be stored for the period of time required by applicable law. This may involve retaining data following your transaction. For example, UPI will, in accordance with the requirements of the Anti-Money Laundering Law of the People's Republic of China, require customer transaction information to be kept for at least five years after the transaction ends. UPI will keep relevant web logs for your use of the service for no less than six months in accordance with the requirements of the Cybersecurity Law of the People's Republic of China. We will delete your personal data once it is no longer required for any of the purposes described above.

In order to determine the amount of time we will store your personal data we take into consideration the role and function of the information, type of products and services, nature of the relationship between you and us and statutory requirement of retention period made by applicable laws and regulations.

## **10. CHILDREN'S DATA**

The UPI service is not directed to individuals under the legal age of majority in their respective countries/territories. If you are children, the consent of the holders of parental responsibility over children is to be obtained.

## **11. LINKS TO OTHER WEBSITES**

You may find links to access the websites of other companies on UPI website. We recommend that you read the privacy policies of these other websites, as this Privacy Notice does not apply to their processing of your personal data and UPI is not responsible for the processing of your personal data on external websites.

## **12. CHANGES IN PRIVACY NOTICE**

We may update this Privacy Notice from time to time – in particular in case of change of law, of guidance from competent authorities or of UPI's internal policies. If we change or expand the purpose of processing personal data, we will provide you with an updated Privacy Policy. In that case, we will share with you the updated Privacy Notice through our website or other channels, and, in certain circumstances, we may seek your consent.

## **13. CONTACT UPI**

If you have any questions about data protection, this Privacy Notice or your right, you can mail us at [360workshop@unionpayintl.com](mailto:360workshop@unionpayintl.com).