

## KM China Customer Privacy Notice

### 康士伯海事中国客户隐私政策



KONGSBERG

Last Updated: June 5, 2024

上次更新时间：2024年6月5日

Kongsberg Maritime China Ltd. and Kongsberg Maritime China Jiangsu Ltd. (Collectively referred to as “**KM China**” or “**We**”) are committed to being responsible for processing your personal information.

康士伯企业管理（上海）有限公司与康士伯船舶电气（江苏）有限公司（以下合称“**康士伯海事中国**”或“**我们**”）承诺将负责地处理您的个人信息。

Before you use or submit any information, please carefully review this Privacy Notice (this “**Notice**”). We will continue to evaluate this Notice to reflect our personal information processing activities, and we may make changes to this Notice accordingly. Any changes will be made on this page, and you should check this page periodically for updates. If we make material changes to this Notice, we will provide you with notice when required by law.

在使用和提供任何个人信息之前，请您仔细阅读本隐私政策（以下简称“**政策**”）。我们会持续评估本政策，使其充分反映我们的个人信息处理活动，并且我们会根据服务的更新情况，适时修改本政策的条款。您应定期检查此页面以获取政策的更新。如果我们对本政策做出重大变更，我们会依照法律的要求向您发出通知。

**This Notice contains the following sections:**

**本政策包含以下部分：**

KM China Customer Privacy Notice.....1  
1. Application and definition ..... 3  
2. How we collect and use your personal information ..... 4  
3. How we share your personal information ..... 7  
4. How we store your personal information ..... 8  
5. How we protect your personal information..... 8  
6. Your choices and rights ..... 9  
7. How we transfer your personal information overseas ..... 10  
8. Updates to this Notice ..... 11  
9. Contact us.....12

1. 适用范围和定义..... 3  
2. 我们如何收集和使用您的个人信息.....4  
3. 我们如何共享您的个人信息.....7  
4. 我们如何保存您的个人信息.....8  
5. 我们如何保护您的个人信息.....8  
6. 您的选择和权利.....9  
7. 我们如何将您的个人信息传输至境外.....10  
8. 本政策的更新..... 11  
9. 联系我们..... 12

## 1. Application and definition

### 1. 适用范围和定义

This Notice governs and describes KM China's practices (as a personal information processor under China's data and privacy law) in connection with personal information that we collect and process from the relevant individuals our customers (such as contact persons) in Mainland China.

本政策描述了康士伯海事中国作为中国数据和隐私法项下的个人信息处理者，如何处理客户相关个人（如企业联络人）的个人信息。

Definitions of “personal information”, “sensitive personal information”, and “processing” in this Notice are set out as follows and are consistent with the definitions in the relevant laws.

本政策中的“个人信息”、“个人信息处理者”、“敏感个人信息”以及“处理”定义与相关法律中的定义一致，具体如下：

- Personal information: refers to various types of information recorded in electronic or other ways that are related to an identified or identifiable natural person, but excluding anonymized information.

“个人信息”是指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，不包括匿名化处理后的信息。

- Personal information processor: refers to an organisation or individual that independently decides on the processing purposes and processing methods during PI processing activities.

“个人信息处理者”是指在个人信息处理活动中独立决定处理目的和处理方法的组织或个人。

- Sensitive personal information: refers to personal information that, if leaked or used illegally, may easily lead to an infringement upon the human dignity of a natural person or endangerment of the safety of his/her body or property, including information on biometric identification, religious beliefs, specific identity, health care, financial accounts, and personal whereabouts, and personal information of minors under the age of fourteen. **Sensitive personal information is in bold and underlined to draw your attention.**

“敏感个人信息”是一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。对于敏感个人信息，**我们将会以加粗下划线的方式提醒您注意。**

- Processing: includes personal information collection, storage, use,

processing, transmission, provision, disclosure and deletion, etc.

个人信息的“处理”包括个人信息的收集、存储、使用、加工、传输、提供、公开、删除等。

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

### 2. 我们如何收集和使用您的个人信息

We will only collect and process your personal information for the following purposes described in this Notice in accordance with the principles of lawfulness, legitimacy, necessity and good faith and in compliance with applicable laws and regulations.

我们将秉持合法、正当、必要原则，遵守适用法律法规的要求，基于下述目的收集和使用您的信息：

2.1. When you visit our company, in order to assist you with making appointments, we will collect and use your name, phone number, and your company's name. In addition, to ensure the safety of yourself and others, we will use monitoring systems and access control systems. We may also collect your **surveillance images**, name, your company's name, access badge card information, door card number, access records (entry and exit time), and license plate number.

当您访问我们的公司时，为了帮助您完成预约，我们将收集并使用您的姓名、电话号码，和您公司的名称。此外，为了保证您和其他人的安全，我们将使用监控系统和访问控制系统，并可能收集您的**监控图像**、姓名、您公司的名称、访问徽章信息、门卡编号、访问记录（出入时间）、车牌号。

2.2. If you wish to attend our events (including but not limited to customer events, technical seminars, webinars, and other non-marketing events), we need to collect your name, mobile number, email address, job title, and your company name. If you are a potential customer, we may also offer you sales services through different channels of sales activities (mobile, email, WeChat, visits), for which we need to collect and use your name, title, phone number, and email address.

如您希望参加我们举办的活动（包括但不限于客户活动、技术研讨会、网络研讨会，以及其他非营销活动），我们需要收集您的姓名、手机号码、电子邮件地址、职位、公司名称。如果您是我们的潜在客户，我们还可能通过不同渠道的销售活动（手机、邮件、微信、拜访）为您提供销售服务，为此我们需要收集并使用您的姓名、职位、电话号码、电子邮件地址。

2.3. To maintain our relationship with you, we may store your information in our CRM system or open an account for you or your company in our systems in order to provide you with services on an ongoing basis. The types of personal

information we collect include name, phone number, email address, and company name.

为了维护与您的关系，我们将您的信息在客户关系管理系统中储存，或在我们的系统中为您的公司开设账户，以持续为您提供服务。我们收集的个人信息类型包括姓名、电话号码、电子邮件地址、公司名称。

- 2.4. During the execution of projects, according to the actual needs of each project, we need to collect your name, telephone number, email address and company name in order to ensure smooth communication with you.

在项目执行过程中，根据项目实际需求，我们需要收集您的姓名、电话号码、电子邮件地址、公司名称，以保证与您的顺畅沟通。

- 2.5. For the purpose of warehousing and delivery, we may need to collect your name, contact details, address, email address in order to provide you with the relevant services. To ensure order intake, we need to collect your name, title, phone number and email address. When we send something to you by courier, we need to collect your name, phone number, home address and company address.

基于仓储和运输目的，为了给您提供相关服务，我们可能需要收集您的姓名、联系方式、地址、电子邮件地址。为了确保订单接收，我们需要收集您的姓名、职位、电话号码和电子邮件地址。当我们通过快递向您寄送时，我们需要收集您的姓名、电话号码、家庭住址、公司地址。

- 2.6. For the purposes of custom declaration, transportation arrangement, as well as the renewal or extension of custom registration, we may need to collect and use your name, phone number, address, and email address.

基于报关、安排运输，或更新/延长海关登记等目的，我们需要收集和使用您的姓名、电话号码、地址、电子邮件地址。

- 2.7. In order to fulfil our obligations under the laws relating to export control laws, we will carry out compliance checks on your company and for this purpose and we need to collect your **ID, passport**, name, date of birth, nationality.

为了履行我们在出口管制法律相关法律项下的义务，我们需要对您的公司开展合规性检查，为此，我们需要收集您的**身份证**、**护照**、姓名、出生日期、国籍。

- 2.8. In the course of conducting customer training, we may collect your name, telephone number, health condition and credentials.

在开展客户培训的过程中，我们可能收集您的姓名、电话号码、健康情况、证书。

- 2.9. For the purpose of applying boarding permit or terminal entrance, we may need to collect your name, telephone number, **ID information**.

出于办理登轮证和出入许可证的目的，我们可能收集您的姓名、电话号码和身份证信息。

- 2.10. If you are a customer of Kongsberg Maritime China Jiangsu Ltd. (“**KMCJ**”), we may use your personal information in the course of delivery and sales business communication, including your contact details (i.e., name, phone number and email), information connected to individuals in products or services.

如果您是康士伯船舶电气（江苏）有限公司（以下简称“康士伯江苏”）的客户，我们在交付和销售业务沟通中可能使用部分您的个人信息，包括您的联系方式（即姓名、电话号码和电子邮件），以及与产品或服务中的个人有关的信息。

2.11. **Circumstances Where Consent Is Not Required**

**不需要同意的情况**

Pursuant to the applicable laws and regulations, we may process your personal information under any of the following circumstances without your consent:

根据适用的法律和法规，我们可以在以下未经您同意的情况下处理您的个人信息：

- Where it is necessary for carrying out human resources management under our legally-established company employment policy or a legally-concluded collective contract;

按照我们依法制定的劳动规章制度和依法签订的集体合同实施人力资源管理所必需；

- Where it is necessary for us to perform a statutory responsibility or statutory obligation;

为履行我们的法定职责或者法定义务所必需；

- Where it is necessary for us to respond to a public health emergency, or for protecting the life, health or property safety of you in the case of an emergency;

为我们应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；

- Where your personal information is processed within a reasonable scope to carry out any news reporting, supervision by public opinions or any other activity for public interest purposes;

- 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理您的个人信息；

- Where the personal information, which has already been disclosed by yourself or otherwise legally disclosed, is processed within a reasonable scope and in accordance with the Personal Information Protection Law; or  
根据《个人信息保护法》的规定，在合理的范围内处理个人自行公开或者其他已经合法公开的个人信息；或
- Any other circumstance as provided by applicable laws and regulations.  
法律、行政法规规定的其他情形。

2.12. We need to process the sensitive personal information mentioned above (**information in bold and underlined**), otherwise we will not be able to provide you with the corresponding services.

我们需要处理上述敏感个人信息（**标示加粗下划线的信息**），否则将无法为您提供相应的服务。

As you are aware, if sensitive personal information is leaked or illegally used, it may have a certain impact on the dignity, personhood, and property security of you.

您已知晓，敏感个人信息一旦泄露或者非法使用，可能对您的人格尊严或者人身、财产安全造成一定影响。

### 3. How we share your personal information

#### 3. 我们如何共享您的个人信息

In order to achieve the purposes above, we may entrust third-party service providers to assist us in providing relevant operation and service support. Such third parties entrusted by us include logistics service providers, IT service providers, questionnaire service providers and compliance service providers, etc. For companies, organisations, and individuals who we entrust to process your personal information, we ask them to handle your personal information in accordance with our instructions, this Policy and applicable laws.

我们可能需要在受我们的委托处理个人信息的第三方服务供应商，例如物流服务提供商、IT服务提供商、问卷服务提供商、合规服务提供商等的协助下实现前述目的。对于受我们的委托处理个人信息的公司、组织和个人，我们会要求他们按照我们的要求、本政策以及法律的要求来处理个人信息。

In addition to the above, to achieve the purposes mentioned above, we may need to share your personal information with third parties who can determine the purposes and methods of the processing your personal information.

除上述情况外，为实现前述目的，我们可能需要向第三方分享您的个人信息该等第三方能够决定处理您个人信息的目的和方法：

Third Party and its Contact Information 第三方及其联系方式	Type of Personal Information 个人信息类型	Purpose and Means 第三方处理的目的及方式
Hotels. Due to the large number of cooperative hotels, we will inform you of the hotel names and their contact information before specific events. 合作酒店。由于合作酒店众多，我们会在具体的活动中告知您酒店名称及其联系方式。	Name, mobile number, email address, position, company name 姓名、手机号码、电子邮件地址、职位、公司名称	Event organisation 活动组织

We may also provide your personal information to our overseas affiliates for purposes such as customer relationship maintenance, as described in Chapter 7 “How we transfer your personal information overseas” of this Notice.

我们还可能基于客户关系维护等目的向境外关联公司提供您的个人信息，具体情况请参见本政策第七章“我们如何将您的个人信息传输至境外”。

#### 4. How we store your personal information

##### 4. 我们如何保存您的个人信息

We will take necessary security measures to ensure the safety of your personal information.

我们将采取必要的安全措施确保您的个人信息的安全。

We only retain your personal information within the minimum period which is necessary for the fulfilment of the purposes stated in this Notice. Meanwhile, we will also store your personal information with adherence to the mandatory provisions about the retention period rising from applicable laws and regulations. Once expired, we will delete your personal information or anonymize it.

我们仅在实现本政策所述目的所需的最短期限内保留您的个人信息。同时，我们还将根据相关法律法规中有关保留期限的强制性规定存储您的个人信息一旦到期，我们将删除您的个人信息或对您的个人信息进行匿名化处理。

#### 5. How we protect your personal information

##### 5. 我们如何保护您的个人信息

We have implemented industry accepted administrative, technical, and physical security measures to protect the personal information you provide and to prevent the



data from being accessed, disclosed publicly, used, modified, damaged or lost without authorisation. We will take all reasonable and practicable measures to protect your personal information.

我们已实施了行业公认的行政、技术和物理安全措施保护您提供的个人信息，以防止遭到未经授权访问、公开披露、使用、修改、损坏或丢失。我们将采取一切合理可行的措施保护您的个人信息。

However, we cannot and do not guarantee that these measures will provide absolute security. Where a personal information security incident occurs unfortunately, we will inform you as required by the laws and regulations via mail, letter, telephone, pushed notification or other available means. Where it is difficult to inform the subjects of the personal information one by one, we may publish an announcement on our Services. Where required by law, we will also report the treatment result of the personal information security incident.

但是，我们也不能保证这些措施将提供绝对安全。如不幸发生个人信息安全事件，我们将按照法律法规的要求及时向您告知相关情况，难以逐一告知您时，我们会采取合理、有效的方式发布公告。同时，我们还将按照法律法规和监管部门要求，上报个人信息安全事件的处置情况。

## **6. Your choices and rights**

### **6. 您的选择和权利**

根据相关法律，您对您的个人信息享有如下权利：

1) the right to know and the right to decide on the processing of your personal information;

您对您的个人信息的处理享有知情权、决定权；

2) the right to restrict or refuse the processing of your personal information by others;

您有权限制或者拒绝我们对您的个人信息进行处理

3) the right to consult and duplicate your personal information;

您有权查阅、复制您的个人信息

4) the right to request personal information processors to correct or supplement your personal information where you discover the information is incorrect or incomplete;

若您发现您的个人信息不准确或者不完整的，您有权请求我们进行更正、补充

5) the right to withdraw your consent to the processing of personal information based on your consent (but please note that your withdrawal of consent does not affect the validity of the processing of personal information that has been carried out based on

your consent before the withdrawal);

对基于您同意而进行的个人信息处理活动，您有权撤回同意（但请您注意，您撤回同意的，不影响撤回前基于您同意已进行的个人信息处理活动的效力）；

6) the right to request the transfer of personal information to your designated personal information processors;

您有权请求将个人信息转移至您指定的其他个人信息处理者；

7) the right to delete your personal information under specific circumstances.

您有权在特定情况下要求我们删除您的个人信息。

If you want to exercise your rights above, please contact us via the contact information provided in this Notice. To protect the security of your personal information, we need to verify your identity in order to respond to your rights request(s), and we may not be able to respond to the request(s) for rights related to personal information that are not from you or authorized by you (for example, requests to consult personal information of someone else).

如果您想行使上述权利，请通过本政策中提供的联系信息与我们联系。为保障您的个人信息安全，我们需要核实您的身份以响应您的权利请求，我们可能无法响应非本人或非经本人授权的个人信息相关权利请求（例如请求查看他人的个人信息）。

Additionally, the rights above are subject to limitations and exceptions under applicable law. We will respond to and comply with your request(s) consistent with applicable law as soon as reasonably practicable. If you have unresolved concerns, you also have the right to complain to relevant supervisory authorities or where applicable, file a lawsuit with the court in accordance with applicable law.

此外，上述权利可能会受到相关法律法规的额外限制。我们将在合理可行的情况下尽快根据相关法律法规回应并响应您的请求。如果您仍有未解决的问题，您也有权向相关监管机构投诉，或根据相关法律法规向法院提起诉讼。

## **7. How we transfer your personal information overseas**

### **7. 我们如何将您的个人信息传输至境外**

For the purposes stated in this Policy, we may transfer your personal information to our headquarter located outside of mainland China, i.e., Kongsberg Gruppen ASA and Kongsberg Maritime AS and other overseas affiliates and subsidiaries. Where personal information is transferred to another jurisdiction outside mainland China, your personal information will be secured by appropriate safeguards as set forth under applicable law, including without limitation, where applicable by the use of the standard contract officially published by the supervisory authority for the transfer of Information between

mainland China and other jurisdictions. To the extent required under applicable law, we will obtain separate consent from you before the transfer of your personal information.

出于本政策所述的目的，我们可能会将您的个人信息转移到我们位于中国大陆以外的总部，即 Kongsberg Gruppen ASA 与 Kongsberg Maritime AS 及其他海外分支机构或关联公司。当个人信息被转移到中国大陆以外的另一个司法管辖区时，您的个人信息将受到适用法律规定的适当保护措施的保护，包括但不限于，在适用的情况下，使用中国大陆和其他司法管辖区之间转移信息的监管机构正式发布的标准合同。在适用法律规定的范围内，我们将在转移您的个人信息之前征得您的单独同意。

<b>Name of the recipient</b> 境外接收方名称	<b>Contact information</b> 联系方式	<b>Purpose and means of processing</b> 处理目的及方式	<b>Types of personal information</b> 个人信息种类	<b>Country/region</b> 境外接收方所在国家/地区
Kongsberg Maritime AS	<a href="mailto:privacy@kongsberg.com">privacy@kongsberg.com</a>	CRM System 客户关系维护系统	Name, phone number, email address, company name, title 姓名、电话号码、电子邮件地址、公司名称、职位	Norway 挪威
Kongsberg Gruppen ASA	<a href="mailto:privacy@kongsberg.com">privacy@kongsberg.com</a>	Global customer support, project execution 全球客户协助，项目执行	Name, phone number, email address, company name 姓名、电话号码、电子邮件地址、公司名称	Norway 挪威
Overseas Kongsberg affiliates and subsidiaries	<a href="https://www.kongsberg.com/contact/">https://www.kongsberg.com/contact/</a>	Conclude new contracts and technical agreement 签署新合同或技术协议	Name, phone number, email address, company name 姓名、电话号码、电子邮件地址、公司名称	Norway, Finland, Sweden 挪威，芬兰，瑞典

## 8. Updates to this Notice

### 8. 本政策的更新

We reserve the right to update this privacy statement at any time, and we may modify the terms of this Notice in a timely manner based on updates to our services, technological advancements, data processing practices, and relevant legal requirements. We will provide you with a new privacy Notice in accordance with applicable laws for

any changes made. We may also inform you from time to time about how your personal information is being processed through other means.

我们保留在任何时候更新本隐私政策的权利，我们可能会根据服务的更新情况、科技的发展进步、数据处理的实践及法律法规的相关要求适时修改本政策的条款。我们将根据法律的相关规定，向您提供新的隐私政策。我们也可能不时地以其他方式告知您关于您的个人信息的处理情况。

## **9. Contact us**

### **9. 联系我们**

If you have questions about this privacy notice or wish to contact us for any reason in relation to our personal information processing, please contact us at [privacy@kongsberg.com](mailto:privacy@kongsberg.com), or via physical address:

Corporate Privacy Officer Kongsberg Gruppen ASA  
P.O. Box 1000  
3601 Kongsberg

如果您对本声明有疑问，或因任何涉及到个人信息处理的问题希望与我们联系，请通过以下方式与我们联系：[privacy@kongsberg.com](mailto:privacy@kongsberg.com)，或通过如下邮箱地址：

Corporate Privacy Officer Kongsberg Gruppen ASA  
P.O. Box 1000  
3601 Kongsberg