



## **Privacy and Cookie Policy IA Group B.V.** **IA Group B.V.隐私权与 Cookie 政策**

This is the Privacy and Cookie Policy of IA Group B.V. based at Van Boshuizenstraat 12, 1083 BA in Amsterdam, the Netherlands and its subsidiaries IA Consultancy B.V.; IA Recovery B.V.; IA Middle East B.V.; IA North America B.V.; IA Latam B.V, IA Shared Services B.V., IA Europe B.V., IA APAC B.V. and IA Africa B.V., hereinafter jointly referred to as “IA”. In this document, IA explains how IA, as a data controller in the meaning of the General Data Protection Regulation (EU) 2016/679 (“GDPR”), uses personal data in the context of the services provided by IA and we provide you with information about your privacy rights. The concept of ‘personal data’ includes all information about an identified or identifiable natural person.

本文件系总部位于荷兰阿姆斯特丹 Van Boshuizenstraat 12 号（邮编 1083 BA）的 IA Group B.V. 及其分支机构 IA Consultancy B.V.、IA Recovery B.V.、IA Middle East B.V.、IA North America B.V.、IA Latam B.V.、IA Shared Services B.V.、IA Europe B.V.、IA APAC B.V. 和 IA Africa B.V.（以下简称“IA”）的《隐私权与 Cookie 政策》。本文件中，IA 就其作为欧盟《通用数据保护条例》（the General Data Protection Regulation (EU) 2016/679，以下简称“GDPR”）中界定的数据控制者，在其提供的服务中如何使用个人数据进行了说明，并为您提供有关您隐私权的信息。“个人数据”这一概念包括有关已识别或可识别的自然人的所有信息。

### **Contacting IA** **联系 IA**

If you have any questions about how IA uses your personal data, you can contact IA via [privacy@iagroup.com](mailto:privacy@iagroup.com) or by post via:

如果您就 IA 如何使用您的个人数据有任何问题，可以通过电子邮件 [privacy@iagroup.com](mailto:privacy@iagroup.com) 或以下邮寄地址与我们联系：

IA  
Attn. Legal Department  
Van Boshuizenstraat 12  
1083 BA Amsterdam  
The Netherlands

### **IA's services and the personal data that IA may process** **IA 的服务及 IA 可能处理的个人数据**



IA is generally engaged for document review, trade, claim and shipment investigations, bilateral and multilateral negotiations, debt management, debt restructuring, litigation, arbitration, insolvencies and legal advice.

IA 为客户提供文件审查、贸易、债务及货物流调查、双边及多边谈判、债务管理、债务重组、诉讼、仲裁、破产及法律建议方面的服务。

When providing these services IA may process personal data of different categories of people. 在提供上述服务的过程中，IA 可能对不同类别的人群的个人数据进行处理。

Below we indicate which personal data we may process of (contact persons of) **clients, debtors, suppliers, job applicants and (other) third parties.**

以下段落中，我们将具体列明 IA 可能对**客户、债务人、供应商、求职者及（其他）第三方**（的联系人）的哪些个人数据进行处理。

## ***Clients***

### ***客户***

IA may process the following (categories of) personal data of clients and their contact persons: IA 可能对客户及其联系人的以下（类别的）个人数据进行处理：

- Name and address details (name, first names, initials, titles, gender, address, postal code, job title) as provided by the client;  
客户提供的姓名及住址详情（姓名、名字、首字母、称谓、性别、住址、邮编、工作职位）；
- Other contact details (telephone number, e-mail address and similar data required for communication) as provided by the client;  
客户提供的其他联系信息详情（电话号码、电子邮件地址及沟通所需的类似数据）；
- Payment details, including bank account information as provided by the client;  
付款详情，包括客户提供的银行账户信息
- Additional information, such as the client's industry and information about the contact person's work history (i.e. previous organizations some worked at before), gender of the contact person(s), mailing language, areas of interest, home address, birthday, a spouse/partner's name, hobbies, and other personal notes as collected during contacts with the contact person(s) of the client;  
附加信息，如客户所在的行业及联系人工作历史的相关信息（即，联系人此前就职的机构）、联系人性别、邮件使用的语言、业务领域、家庭住址、生日



期、配偶或伴侣姓名、爱好、以及与客户联系人接触过程中收集到的其他个人特征

- File reference numbers and information about client's clients;  
案件索引号及客户的客户信息；
- In addition thereto if you use IA' Portal: login-details such as user name and password and any personal data relating to you that you enter into the open text field;  
此外，如果您使用 IA 门户网站，IA 还可能处理您的用户名、登录密码、以及您在开放文本框中输入的任何个人数据等详细登录信息
- Other data of which the processing is required by or necessary to comply with applicable laws or regulations, as provided by the client, obtained from a public source, obtained from supervisory or regulatory authorities or another third party.  
数据处理过程所必需的或遵照相关法律法规所必需的其他数据，这些数据可能由客户提供，也可能由 IA 经由公共资源、监督管理部门、或其他第三方等渠道获取。

### **Debtors**

#### **债务人**

If you are a debtor in a file that is entrusted to IA by a client, IA performs an in-depth investigation. Through this investigation, IA may process the following (categories of) personal data obtained via our client, via public sources, obtained from supervisory or regulatory authorities or another third party or directly from you if you provide such personal data to us: 如果您是客户委托 IA 处理的案件的债务人，IA 就案件进行深入的调查。调查过程中，IA 可能会处理经由客户、公共资源、监督管理部门、其他第三方等渠道获取的或由您直接向我们提供的以下（类别的）个人数据：

- Name and address details (name, first names, initials, titles, gender, address, postal code, job title);  
姓名及住址详情（姓名、名字、首字母、称谓、性别、住址、邮编、工作职位）
- Other contact details (telephone number, e-mail address and similar data required for communication);  
其他联系信息详情（电话号码、电子邮件地址及沟通所需的类似数据）；
- Claim amount;  
委托金额；
- Commercial, financial and trade history;  
商业、财务及贸易历史
- Shareholder and/or director's information;  
股东及或董事的信息



- Information regarding assets; bank accounts and other sources of income;  
有关资产、银行账户、及其他收入来源的信息;
- Additional such as the industry the debtor works in, work history (i.e. previous organizations some worked at before), gender, mailing language, areas of interest, home address, birthday, a spouse/partner's name, hobbies, and other personal notes.  
其他信息，如债务人工作的行业、工作历史（即，此前就职的机构）、性别、邮件使用的语言、兴趣范围、家庭住址、出生日期、配偶或伴侣姓名、爱好、及其他个人特征;
- Other data of debtors of which the processing is required by or necessary to comply with applicable laws or regulations.  
数据处理过程中必需的或因遵守相关法律法规所必需的有关债务人的其他信息。

IA' clients can obtain access to IA' Portal in which they can find information about their cases. The Portal contains general file information including the name of the debtor, the claim amount, information about IA' client's client and IA' file reference number and the client can add additional information in an open text field.

IA 的客户能够获取 IA 门户网站的访问权限以了解其案件信息。门户网站包含案件的一般性信息，如债务人姓名、委托金额、关于客户的客户的信息、以及 IA 的案件索引号，客户还可以在开放文本框中添加额外的信息。

### **Suppliers** **供应商**

IA may process the following (categories of) personal data of persons from whom IA purchases products or services or who work for these **suppliers**:

IA 可能对供应商向其采购产品或服务的供应商或为这些供应商工作的员工的以下（类别的）个人数据进行处理：

- Name and address details (name, first names, initials, titles, gender, address, postal code, residence) as provided by the supplier;  
供应商提供的姓名及住址详情（姓名、名字、首字母、称谓、性别、住址、邮编、居住地）；
- Other contact details (telephone number, e-mail address and similar data required for communication) as provided by the supplier;  
供应商提供的其他联系信息详情（电话号码、电子邮件地址及沟通必需的类似数据）；
- Data for the purpose of placing orders or purchasing services; calculating and recording fees and expenses and making payments, including the bank account number as provided by the supplier;



为下单或采购服务、计算及记录费用和开支及支付货款之目的提供的数据，包括供应商提供的银行账户号码；

- Other data of suppliers of which the processing is required by or necessary to comply with applicable laws or regulations as provided by the supplier, obtained from a public source, obtained from supervisory or regulatory authorities or another third party.  
数据处理过程必需的或因遵守相关法律法规所必需的有关供应商的其他数据，这些数据可能由供应商提供，也可能经由公共资源、监督管理部门、或其他第三方等渠道获取。

### **Job applicants**

#### **求职者**

When you apply for a job at IA, we may process the following data in order to deal with your job application:

当您在 IA 应聘时，我们可能会处理以下数据，以处理您的工作申请：

- Name and address  
姓名及住址
- Contact details, including telephone number and email address  
联系信息，包括电话号码及电子邮箱地址
- Bank details  
银行账号信息
- Gender  
性别
  
- Date of birth  
出生日期
- Educational attainment  
教育程度
- Availability  
可入职时间
- Content of your CV  
您简历中的内容
- Cover letter with your reasons for applying, certificates, references and where relevant: assessment results.  
表明您申请理由的自荐信、所持证书及推荐人信息，以及相关的评估结果。

### **Third parties**

#### **第三方**

When rendering its services IA may process personal data from other third parties, for example shipping agents, port authorities, witnesses, experts, court officials, receivers, clients



of IA' clients, governmental officials, lawyers, advisors and notaries with whom IA is in contact. We may process the following (categories) of personal data:

IA 在提供服务的过程中，可能处理来自第三方，如 IA 与之联系的货运代理、港口监管部门、证人、专家、法院工作人员、财产管理人、IA 客户的客户、政府官员、律师、顾问及公证员的个人数据。我们可能会对以下（类别的）个人数据进行处理：

- Name and address details (name, first names, initials, titles, gender, address, postal code, residence), as far as known to IA;  
IA 知晓的姓名及住址详情（姓名、名字、首字母、称谓、性别、住址、邮编、居住地）；
- Other contact details (telephone number, e-mail address and similar data necessary for communication), as far as known to IA;  
IA 知晓的其他联系信息详情（电话号码、电子邮件地址及沟通所必需的类似数据）；
- Data relating to electronic messages originating from or intended for third parties and data required to maintain contact with these third parties;  
来自于第三方或意图发送给第三方的电子信息的相关数据，以及与这些第三方保持联系所必需的数据；
- Other data from third parties obtained from public sources or provided to IA by clients (e.g. in IA' Portal), supervisory or regulatory authorities or another third party or the third party itself.  
来自第三方的其他数据，这些数据可能从公共资源渠道获取，或由客户（如在 IA 门户网站中提供）、监督管理机构、其他第三方或该第三方本身向 IA 提供。

### Camera surveillance

Please note that we may use camera surveillance at our offices. If this is the case, it will be clearly indicated.

### 视频监控

请您知悉，我们可能在 IA 的办公场所使用摄像监控。若有正在使用中的监控摄像，我们将明确告知。

### On the basis of which legal processing grounds and for which purposes does IA process your personal data?

#### IA 基于哪些法律依据以及出于何种目的对您的个人数据进行处理？

IA processes your personal data on the basis of one or more of the following legal processing grounds:

IA 基于以下一种或多种法律依据对您的个人数据进行处理：



- a) If this is necessary for the performance of an agreement to which you are a party or to perform precontractual acts at your request;  
履行您作为当事一方的协议所必需，或按照您的要求实施前合同行为所必需；
- b) If this is necessary to comply with statutory obligations;  
履行法定义务所必需；
- c) If this is necessary to justify our legitimate interests or the interests of a third party;  
证明我们的合法利益或第三方利益所必需；
- d) Your consent.  
基于您的同意。

If IA processes your personal data on the basis of your consent, IA will ask you for it separately. You may withdraw your consent at any time. IA draws your attention to the fact that the withdrawal of your consent does not affect the lawfulness of the processing of your personal data prior to the withdrawal of your consent.

若基于您的同意对您的个人数据进行处理，IA 将就有关事项单独征求您的意见。您可以在任何时候撤销您的同意。IA 提请您注意，您撤销同意的事实不会影响该同意被撤销之前我们对您的个人数据进行的处理的合法性。

IA uses the above personal data for the purposes stated below, in respect of which we have indicated for each purpose on the basis of which of the abovementioned legal processing grounds (a through d) IA does so. If the processing is based on the principle of 'legitimate interest', we briefly explain this interest. If you have any specific questions in this respect, please do not hesitate to contact us.

IA 出于下文列举的目的使用上面提到的个人数据。下文中，我们对每一种目的下的个人数据使用都注明了 IA 数据使用具体基于上述法律依据（a 到 d）中的哪一项。

#### *Purposes with corresponding processing grounds* *具有相应处理依据的个人数据使用目的*

We may process your personal data in order to:  
我们可能出于以下目的对您的个人数据进行处理：

- To provide the requested services (*a, b and c: being able to offer and improve our services*);  
提供所要求的服务（a、b 及 c：能够提供并改进我们的服务）；
- To provide clients with access to IA' Portal, in which a client can see general information about a case, including, but not limited to the status of the file and the pending amount (*a and c: optimizing our services*), see also under "Cookies";



向客户提供 IA 门户网站的访问权限，在门户网站中，客户能够看到相关案件的一般性信息，这些信息包括但不限于案件处理的进展情况和到期未付款项金额（a 及 c：优化我们的服务），并请参见“Cookies”部分；

- For IA’s administration, including the calculation or recording of fees or benefits, income and expenses, the payment and collection of claims (including the use of collection agencies or bailiffs) (*a, b and c: the importance of keeping proper records*); IA 的内部管理目的，包括费用或收益、收入及开支、付款及欠款回收（包括使用欠款回收中介机构或执行官）的计算或记录（a、b 及 c：保存恰当的记录的重要性）；
- To be able to deal with any complaints and disputes about our services (*a, b and c: to defend rights, to maintain and improve existing relationships by means of proper handling of complaints, to improve the quality of our services*); 处理与服务有关的投诉及争议（a、b 及 c：维护权益、通过恰当处理投诉维持并增进现有关系、改进我们的服务质量）；
- To maintain contact and communicate with you (*a, b, c: the interest in bringing IA’ services to the attention of existing clients*); 与您保持联络和沟通（a、b、c：使现有客户关注到 IA 的服务的益处）；
- To handle your job application, more specifically:
- 处理您的求职申请，具体包括：
  - Recruitment and selection  
招聘及遴选
  - Assessment of suitability for a position with IA  
就您与 IA 提供的职位的匹配度进行评估；
  - Dealing with any expenses incurred  
处理产生的任何支出；
  - Internal checks and business security service  
内部检查及商业安全服务；
  - Improving our job application procedure  
改进我们的职位申请程序；
  - Dealing with your questions, comments and complaints  
处理您提出的问题、意见和投诉；
  - Analysing and reporting on questions, comments and complaints  
对相关问题、意见和投诉进行分析及报告；
  - Regulatory compliance and compliance with court orders  
遵守法规及履行法院指令

*(a, b, c: our legitimate interest in assessing whether you are suitable for the job opening and d: consent if you wish to remain in our portfolio, see the header: “How long does IA retain your personal data?”)*





(a、b、c: 我们对您是否适合相关职位进行评估的合法利益; 以及 d: 您是否同意将您的个人数据保留在我们的后备精英库中, 请参见“IA 在多长时间保留您的个人数据?”)

- For internal knowhow purposes and training (*c: our interest in optimizing our services and training our staff adequately*);  
内部知识技能及培训 (c: 我们优化服务及进行充分的员工培训的益处);
- For placing orders or purchasing services (*a, b and c: our interest in being able to keep proper records*);  
下单或采购服务 (a、b 及 c: 我们能够保存恰当记录的益处)
- For conducting audits and other internal controls (*a, b and c: our interest in being able to keep proper records*);  
进行审计及其他内部控制 (a、b 及 c: 我们能够保存恰当记录的益处)
- For the security and access control of our premises property and the protection of our employees and visitors, and for following up incidents (*c: our interest in using camera surveillance to protect our visitors, employees and property*).  
为了保证我们的办公场所的财产安全、控制人员进出、保护我们的员工和访客, 以及对突发事件进行记录 (我们使用视频监控以保护我们的访客、雇员和财产的安全)。
- To comply with our legal and statutory obligations (*b, c: the interest of being able to meet these obligations*);  
履行我们的法律义务及法定义务 (b、c: 能够履行这些义务的益处);

## Data security 数据安全

IA takes office-wide security measures. Technical measures include the use of access control and restrictions based on function level and jurisdictional clearance. IA also uses firewalls, virus scanners and traffic monitoring. Additional measures include clean desk and screen policy, confidentiality provisions with IA's employee's and IA's service providers.

IA 在全公司办公室范围内采取数据安全措施。这些技术措施包括基于功能级别和管辖权限设置的数据获取权限控制及限制。同时, IA 也采用防火墙、病毒扫描技术、网络流量监测等措施。其他数据安全措施包括清理办公桌及电脑屏幕政策以及与 IA 员工及服务提供方签订保密条款。

If you have any questions about the security of your personal data, or if you suspect or see signs of misuse, please contact us via [privacy@iagroup.com](mailto:privacy@iagroup.com).

如果您有任何关于您的个人数据安全的问题, 或您怀疑存在或者已经发现您的个人数据被错误使用的迹象, 请通过 [privacy@iagroup.com](mailto:privacy@iagroup.com) 与我们联系。

## Cookies Cookies



When you choose to use our IA Portal, we will place certain cookies on your device (e.g. your computer, smartphone or tablet) in order to ensure that the IA Portal works properly. Cookies are small data files that are stored by your browser on your device read out when you use the IA Portal. IA uses the following functional cookies, also known as necessary cookies:

当您选择使用我们的 IA 门户网站，我们将在您使用的电子设备（如您的电脑、智能手机或平板电脑）上设置某些 cookies，以确保 IA 门户网站的正常运行。Cookies 是当您使用 IA 门户网站时，您的浏览器在您使用的电子设备上保存的小的数据文件。IA 使用下列功能性的 cookies，它们也被称为必要的 cookies：

Name 名称	Provider 提供者	Purpose 目的	Expiry date 到期日
ia_portal_session ia 门户网站会话	IA IA	This cookie contains a unique id to link a request to a session on the server and to check whether a user is logged in and thereby enables tracking of the session of the user. 此 cookie 包含一个唯一的 ID，用于将请求连接到服务器上的会话并检查用户是否已登录，从而能够跟踪用户的会话。	Session 会话
XSRF-TOKEN XSRF-TOKEN	IA IA	This cookie contains a random unique ID in order to prevent cross-site request forgery (that forces an end user to execute unwanted actions on a web application in which they're currently authenticated). 此 cookie 包含一个随机的唯一 ID，以防止跨站点请求伪造（这会迫使最终用户在当前经过身份验证的网页应用程序上执行并不希望进行的操作）。	Session 会话

#### **To whom does IA provide your personal data?**

#### **IA 向谁提供您的个人数据？**

IA does not provide your personal data to third parties ('recipients' within the meaning of the applicable privacy legislation), unless this is necessary for the proper performance of the purposes set out in this Privacy and Cookie Policy, if the law requires us to do so or if you have provided your consent to this end. The third parties to whom the personal data are made available are obliged to handle your personal data confidentially. If these parties qualify as a 'data processor' within the meaning of the applicable privacy legislation, IA will ensure that a data processing agreement is concluded with these parties, which complies with the requirements included in the GDPR.



IA 不会将您的个人数据提供给第三方（相关隐私权立法中所定义的“数据接收者”），除非为恰当实现本《隐私权与 Cookie 政策》列明的目的所必需，且法律要求我们这样做或您已同意我们这样做。有权限获得您的个人数据的第三方有义务以保密的方式使用您的个人数据。如果这些第三方是相关隐私权立法中定义的有资格的“数据处理者”，IA 将确保与这些第三方签订符合 GDPR 要求的数据处理协议。

Third parties which offer services to IA as an independent data controller, such as accountants, civil law notaries experts engaged to provide an opinion or export report, are themselves responsible for the (further) processing of your personal data in accordance with the applicable privacy legislation.

作为独立数据控制者向 IA 提供服务的第三方，如会计师及负责提供意见或专业报告的民法公证人，按照相关隐私权立法就其对您的个人数据进行的（进一步）处理自行承担 responsibility。

IA can e.g. share personal data with:

IA 可以与特定主体分享您的个人数据，比如：

- **Our local offices and agents;**  
我们的当地办公室及办案人员；
- **Suppliers (for example software suppliers, bailiffs, courier services, translation agencies, accountants, assessment companies etc.);**  
服务提供者（如软件提供商、执行官、快递服务商、翻译机构、财务人员、评估公司等）；
- **With IA's legal successors if IA is acquired by or merged with another company, for example through bankruptcy and also with third parties involved in such proposed or actual business transaction;**  
如果 IA 被另一家公司收购或与另一家公司合并，IA 在法律上的权利义务继受者（如通过破产程序继受权利义务）及参与到拟议中的或实际发生的此类商业交易过程的第三方；
- **Courts and government institutions;**  
法院及政府机构；
- **Regulators and other authorities.**  
监管者及其他有权机关。

By nature of our services, personal data of debtors will be shared with the client that has entrusted the respective corresponding file to us.



我们所提供的服务的特性决定了我们将与委托我们处理案件的客户分享相关案件债务人的个人数据。

In order to provide our services, IA might need to transfer your personal data to a recipient in a country outside the European Economic Area with a lower degree of protection of personal data than the European law offers. In that case, IA will ensure that such a transfer of personal data is in accordance with the applicable laws and regulations, for example by concluding a model contract prepared and approved for that purpose by the European Commission and will assess whether any additional measures are necessary to guarantee an appropriate level of protection of your personal data. Please do not hesitate to reach out to IA if you wish to receive more information about the appropriate or suitable safeguards in place for data transfers outside of the European Economic Area or if you would like to obtain a copy of them. 为提供我们的服务，IA 可能需要将您的个人数据转移给位于欧洲经济区（European Economic Area）以外某国的数据接收者，而该国的个人数据保护程度可能低于欧洲法律的保护程度。在这样的情况下，IA 将确保这样的个人数据转移符合相关法律法规的规定，如与数据接收者签订欧盟委员会（European Commission）为此类目的制定并批准的格式合同，并将评估是否需要采取任何额外措施以确保您的个人信息受到恰当程度的保护。如果您希望获取更多关于向欧洲经济区以外的国家和地区转移个人数据时恰当或适当的数据保护措施的信息，或您希望获取这些措施的副本，请随时与 IA 联系。

### **How long does IA retain your personal data?**

#### **IA 在多长时间保留您的个人数据？**

IA does not retain your personal data in an identifiable form for longer than is necessary to achieve the purposes included in this Privacy and Cookie Policy. More specifically, we apply the following retention periods:

IA 以可界定的形式保留您的个人数据的期间不会长于实现本《隐私权与 Cookie 政策》目的所必需的期限。具体而言，我们适用以下数据保留期：

- Personal data that must be kept on the basis of Article 52 of the Dutch State Taxes Act will be kept for 7 years (from the end of the year in which the data in question have lost their current value for the (tax-) related business operations) in connection with the tax retention obligation incumbent on IA pursuant to Article 52(4) of the Dutch State Taxes Act.  
根据《荷兰国家税务条例》（Dutch State Taxes Act）第 52 条必须持有的个人数据将被保留 7 年（从相关数据丧失其在涉税商业经营活动中的当前价值那一年的年底起算），这与 IA 按照《荷兰国家税务条例》第 52（4）条规定负有的税收保留义务相关。
- The personal data you provide to IA for your job application will be retained for up to four weeks after the end of the application procedure. With your consent, we will retain your personal data in our portfolio up to one year after termination of the application process. This will give us the possibility to contact you for possible future job openings at IA. Personal data that you have provided in the context of your application will become part of your personnel file when you start working for IA.



您为职位申请的目的向 IA 提供的个人数据将在申请程序结束后被保留最长不超过 4 个星期。经您同意，您的个人数据将在我们的数据库中保留最长不超过申请流程终止后一年。这将使我们有机会在将来出现职位空缺时与您联系。当您开始为 IA 工作，您在申请过程中提供的个人数据将成为您的人事档案的一部分。

- Camera images and corresponding information (date and time stamp) are kept for 72 hours.  
视频影像和相关信息（如日期和时间标记）将被保存 72 个小时。

The abovementioned specific retention periods can be extended if statutory retention obligations apply or will become applicable. IA may also retain the personal data for a longer period of time if this is necessary in light of IA' legitimate interests, e.g. for the handling of incidents and/or legal disputes. For more information regarding the retention periods related to the use of cookies, we kindly refer you to the section "Cookies" in this Privacy and Cookie Policy.

若法定保留义务适用或将会适用，则上述保留期限可以延长。鉴于 IA 的合法权益，如为处理事件及/或法律争议所必需，IA 还可以在更长的期间内保留个人数据。关于 cookie 使用的数据保留期限的更多信息，敬请参见本《隐私权与 Cookie 政策》的“Cookies”部分。

## **Your privacy rights**

### **您的隐私权**

You have the following rights in respect of the processing of your personal data by IA:  
就 IA 对您的个人数据进行的处理，您享有以下权利：

- the right to request whether IA processes your personal data and if so, the right to access your personal data and to receive information about the processing of your personal data;  
询问 IA 是否处理您的个人数据；如果 IA 的确对您的个人数据进行处理，您有权获取您被处理的个人数据并获得有关对您个人数据进行处理的信息。
- the right to rectification of your personal data if these are incorrect or incomplete;  
如果您的个人数据不正确或不完整，您有权进行更正；
- the right to have your personal data deleted ('right to be forgotten');  
删除您的个人数据的权利（“被遗忘的权利”）
- the right to object to the processing of your personal data or to limit the processing of your personal data;  
拒绝我们对您的个人数据进行处理，或对处理进行限制
- the right to withdraw your consent for the processing of your personal data, if the processing is based on your consent;  
如果处理是基于您的同意进行，您有权撤回您对处理您个人数据的同意
- the right to receive or surrender your personal data to a third party appointed by you in a structured, customary and machine-readable form ('right to data portability').



您有权以结构化的、符合惯例的、机器可读的形式取得您的个人数据或将您的个人数据转移至您指定的第三方（“数据可携权”）

IA does not use automated decision-making within the meaning of Article 22 GDPR.

IA 不使用 GDPR 第 22 条定义的自动决策。

### **Exercising your privacy rights**

#### **行使您的隐私权**

To exercise your privacy rights, you can contact IA via [privacy@iagroup.com](mailto:privacy@iagroup.com) or by post using the contact details stated above.

为行使您的隐私权，您可通过 IA 电子邮箱 [privacy@iagroup.com](mailto:privacy@iagroup.com) 与我们联系，也可以通过前文列出的地址向我们邮寄信件：

If you live or work in the UK, you can also contact our data protection representative for the UK via [iagroup@lionheartsquared.co.uk](mailto:iagroup@lionheartsquared.co.uk) or by post via:

如果您在英国生活或工作，您也可以通过 [iagroup@lionheartsquared.co.uk](mailto:iagroup@lionheartsquared.co.uk) 或以下邮寄地址与我们的英国数据保护代表取得联系：

Lionheart Squared Limited  
FAO IA Group  
17 Glasshouse Studios, Fryern Court Road  
Fordingbridge, Hampshire  
SP6 1QX  
United Kingdom

In order to prevent that IA discloses information to the wrong person, IA can ask you for additional information to verify your identity. In principle, IA will inform you of whether IA can comply with your request, within one month after receipt. In specific cases, for example when it concerns a complex request, this term may be extended by two months. IA will inform you of such an extension within one month after receiving your request. On the basis of the applicable privacy legislation, IA can refuse your request under certain circumstances. If this is the case, we will explain to you why. You can find more information about your privacy rights on the website of the [Dutch Data Protection Authority](#).

为防止 IA 向错误的人披露信息，IA 可以要求您提供其他信息以验证您的身份。原则上，IA 会在收到您的请求后一个月内通知您 IA 是否可以满足您的要求。在特殊情况下，如涉及复杂的请求时，该期限可以延长两个月。IA 将在收到您的请求后一个月内就延期向您进行告知。根据适用的隐私立法，IA 可以在某些情况下拒绝您的请求。如果出现这种情况，我们会向您解释原因。您可以在荷兰数据保护局（Dutch Data Protection Authority）网站上找到有关您的隐私权的更多信息。



## **Complaints**

### 投诉

If you have a complaint about the processing of your personal data by IA, we will be happy to work together to find a solution. If this does not lead to the desired result, you will have the right to file a complaint with the competent supervisory authority. In the Netherlands, this is the [Dutch Data Protection Authority](#). If you live or work in another country of the European Union, you can file a complaint with the supervisory authority of that country. In the United Kingdom, individuals can file a complaint with the [Information Commissioner's Office](#).

如果您就 IA 对您的个人数据的处理有任何异议，我们将非常乐意与您共同寻找解决方案。如果未能达成双方期望的结果，您有权向有权监管机构提出投诉。在荷兰，这一机构为荷兰数据保护局（[Dutch Data Protection Authority](#)）。如果您在欧盟的另一个国家生活或工作，您也可以向该国的监管机构提出投诉。在英国，个人可以向信息专员办公室（[Information Commissioner's Office](#)）进行投诉。

## **Amendments**

### 修订

This Privacy and Cookie Policy was last amended on **9 November 2022**. IA reserves the right to amend this Privacy and Cookie Policy. The most recent version of this Privacy and Cookie Policy will always be posted on our website.

本《隐私权与 Cookie 政策》的最后修订日期为 2022 年 11 月 9 日。IA 保留对本《隐私权与 Cookie 政策》进行修改的权利。我们的网站上所公布的《隐私权与 Cookie 政策》始终为最新版本。