

英格卡中国候选人隐私政策

INGKA China Candidate Privacy Policy

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本隐私政策适用于您向其申请相关职位的英格卡中国实体（以下简称“我们”、“公司”、或“英格卡中国”）对您个人信息的收集与使用的实践。英格卡中国通过本政策通知求职者有关其个人信息的收集与使用的目的、范围与方法。本政策仅适用于位于中华人民共和国境内（仅为本政策之目的，不包含香港、澳门、台湾地区）的职位，包括 Avature 招聘门户网 (<https://ikeachina.avature.cn>)，或英格卡中国通过线下或其他第三方线上渠道更广泛地展开的招聘活动，且只适用于年满 18 周岁的候选人。

This Privacy Policy applies to all INGKA China candidates (hereinafter referred to as “we” or “us”, “company”, or “Ingka China”), the objective is to inform you of the purpose, scope and method of collecting and using your personal information. This Privacy Policy is only applicable to candidates who apply for positions within the territory of mainland China (for the purpose of this Privacy Policy only, excluding Hong Kong, Macau and Taiwan) in connection with Avature portal (<https://ikeachina.avature.cn>) and INGKA China's recruiting activities, which are generally held offline and online via third party websites. The candidates shall be aged 18 years or above.

如果您有任何疑问、意见或建议，请通过以下联系方式与信息安全与隐私保护团队联系。请注意，本隐私政策中所列的联系方式无法解答任何有关职位申请的问题。

If you have any questions, comments or suggestions, please contact Information Security and Data Privacy Team with following contact information. Kindly do not send any inquiry relating job application to the below contact.

电子邮件：<isdp.general.cn@ingka.ikea.com>

E-mail: <isdp.general.cn@ingka.ikea.com>

英格卡中国深知个人信息对您的重要性，并会尽全力保护您的个人信息安全可靠。我们致力于维持您对我们的信任，保护您的个人信息；同时，英格卡中国承诺，我们将按业界成熟的安全标准，采取相应的安全保护措施来保护您的个人信息。请仔细阅读并了解本《隐私政策》。如您选择申请职位并提交您的个人信息，即意味着您完全理解本隐私政策的全部内容，并同意我们按照本隐私政策收集、使用、储存和分享您的相关信息。

INGKA China knows the importance of personal information to you very well, so we will do our best to protect your personal information. We are committed to maintaining your trust and protecting your personal information. In the meantime, INGKA China promises that we will adopt appropriate security protection measures to protect your personal information based on mature security standards of the industry. Please read carefully and understand this Privacy Policy. Your choice of job application and submitting your personal information means that you have fully understood the entire contents of this Privacy Policy

and agreed that we could collect, use, store and share your relevant information in accordance with this Privacy Policy.

注：本《隐私政策》版本更新日期为【2022年10月18日】，将于【2022年10月25日】正式生效，在【2022年10月18日】至【2022年10月24日】期间，对于申请职位的候选人，或是您认为更新的《隐私政策》对您更有利，我们同意双方适用新的《隐私政策》内容。

Please notice: The last update date of this privacy policy is 【18th Oct. 2022】， and the effective date is 【25th Oct. 2022】. During the period between 【18th Oct. 2022 and 24th Oct. 2022】， for all new candidates, or candidates who prefer to apply the new version of the Privacy Policy, we agree that the new version of the Privacy Policy shall apply.

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定义 Definition

英格卡集团：指 INGKA Holding B.V.及其控制实体。

INGKA Group: refers to INGKA Holding B.V. and its controlled entities.

英格卡中国：指 INGKA Pro Holding B.V.在中华人民共和国（以下简称“中国”）境内（为本隐私政策之目的，中国的香港、澳门和台湾地区除外）投资的所有法人实体，各个实体及详细注册地址见附件一。

INGKA China: refers to all legal entities invested by INGKA Pro Holding B.V. in mainland (for the purpose of this Privacy Policy, Hong Kong, Macau and Taiwan are excluded) of the People's Republic of China (hereinafter referred to as "China"). Please refer to Appendix 1 for all the entities' name and corresponding registration addresses.

个人信息：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: All kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding the information processed anonymously.

敏感个人信息：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。

Sensitive personal information: The personal information that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used, including such information as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal information of minors under the age of 14.

我们如何收集和使用您的个人信息？ How do we collect and use your personal information?

我们收集、使用或披露您的个人信息来处理您的求职申请，包括但不限于如下场景、目的及收集的个人信息种类，其中对于您的敏感个人信息已进行**加粗与下划线**处理，以提醒您注意。

We collect, use or disclose your personal information to establish, manage, maintain or terminate the employment relationship between you and Ingka China, or the relationship after your dismissal, which includes but is not limited to the following purposes and personal information types. Please note, the sensitive personal information has been **bolded and underlined** to draw your attention:

1. 为了完成 Avature 招聘门户网站的账号注册/登录，您需要设置【**密码**】，我们会收集、使用您的【姓名、电子邮箱、手机号、城市、工作经历、简历】；

1. When registering or logging into the Avature portal, you need to set up [**password**]. We will collect and use your [name, email, phone number, current city, work experience and CV];

2. 当您使用 Avature 招聘门户网站申请职位，或参加线下招聘会，或通过内推人、电话、电邮或其他方式与我们进行相关交流时，我们将要求您提供或处理您提供的【姓名、性别、出生年月、国籍/民族、联系电话、**身份证号**、联系地址、户口地址、邮编、电子邮箱、紧急联系人及其联系信息、婚姻状况（选填）、个人住房情况（选填）、期望薪资、申请职位、现工作城市、离职通知期、教育经历、工作/实习经历、解聘事实、竞业限制、家庭状况（选填）、利益冲突披露、基本技能、**个人犯罪记录**，以及其他您选择上传或提供的个人信息（包括简历或附件中的信息）】；

2. When you apply for job position in Avature portal, or participate in offline recruiting activity, or communicate with us via referee, phone call, email or other channel, we will ask you to provide or process the personal information you have provided such as [name, gender, date of birth, nationality, contact number, **ID code**, contact address, residence address, zipcode, email, urgency contact person and corresponding contact information, marriage status (optional), personal housing (optional), expected monthly salary, application position, current working city, notice period, education experience, working/internship experience, dismissal fact, competition restriction, family information

(optional), disclosure of conflicts of interests, skills and competency, **crime record**, and other personal information you choose to upload or provide (including the information in CV or attachment)];

3.为了与您进一步沟通招聘事宜,我们可能会使用您提供的信息,向您告知求职申请的状态更新、邀请您参加远程或现场面试、向您推荐新的空缺职位、向您发送聘用意向书等;

3. In order to further communicate with you about the recruitment, we might process the information you have provided, inform you of the application status update, invite you to attend the online or offline interview, recommend you the new vacancy or send you offer;

4. 为了核实您提交的资料,评估您是否适合相关职位,我们可能会对您展开背景调查,并收集您在工作经历中的【入/离职时间、职位、工作职责、工作表现、离职原因、**违纪情况**、竞业限制】信息,必要时我们将引入第三方授权合作伙伴对您展开背景调查流程。为了更好地分析您与申请职位的适配性,我们还会邀请您参加在线认知评估测试。

4. In order to verify the materials you provided and evaluate if you're suitable for the application position, we might initiate the reference check process and collect your [Date on board/when quit, position, main responsibilities, working performance, leaving reason, **discipline violation**, competitive restriction]. We might engage third party to proceed the reference check when necessary. In order to better assess if you are suitable for the application position, we might invite you to attend the online cognitive test;

5. 为了获得对招聘程序的反馈,优化招聘流程,我们可能会邀请您填写问卷调查,并收集您的反馈。该问卷调查属于自愿性质,我们将对问卷中收集的信息保密;

5. In order to receive the feedback and optimize the recruitment process, we might invite you to fulfil the questionnaire and collect your opinions on our recruitment process. It is completely voluntary and we will keep secret about the information in the questionnaire;

6. 为了保障 Avature 招聘门户网站的相关功能、分析我们服务的使用情况以及提高用户使用体验,当您浏览网站时,我们可能会记录【您的浏览信息】;当您使用职位筛选功能时,我们可能会收集【您的搜索关键字信息】;以及在您使用 Avature 招聘门户网站时,我们会自动向您收集【IP 地址、cookie 记录的您在浏览期间的活动信息、时区设置、操作系统及平台以及有关您对 Avature 招聘门户网站使用的信息(如完成职位申请的时间、页面浏览历史、申请记录等)】。

6. In order to ensure the relevant functions of the Avature portal, analyse the usage of our services and improve the user experience, we may record [your browsing information] when you browse the portal; when you use the job select function, we may collect [your search keyword information]; and when you use the Avature portal, we will automatically collect your [IP address, cookie-recorded activity information during your browsing, time zone settings, operation system, platform, and information generated from your usage of Avature portal (e.g. completion time of job application, browsing history, application records, etc.)].

为了保护您的利益,英格卡中国会要求您提供紧急联络人的姓名与联系方式,除了用以告知该紧急联络人与您相关的紧急、特殊的情况之外,英格卡中国不会使用或处理与紧急联络人有关的信息。为了遵照有关利益冲突的政策,我们可能会要求您提供在英格卡中国工作的亲友的信息。为了开展背景调查流程,英格卡中国会要求您提供相关信息,如直线经理的联系方式。您承诺您(而不是英格卡中国)负有从第三人处取得使用以上个人信息的同意的义务。

In order to protect your interests, INGKA China collects emergency contact information, including name and contact number. The collection is solely for the purpose of informing the contact of your emergency or special situations and INGKA China shall not use or process emergency contact information for other purposes. In order to comply with our policy on conflicts of interest, we may ask you to provide information about relatives and friends working in INGKA China. In order to carry out the reference check process, INGKA China will ask you to provide relevant information, such as the contact information of your

line manager. The responsibility to obtain consent to the usage of their personal information lies with you, not INGKA China.

您充分知晓，我们收集、使用个人信息可能基于以下合法依据之一：

You shall be fully aware that we may collect and use your personal information based on one of the following legitimate foundations:

1. 取得个人的同意；
Where the consent of the individual concerned is obtained;
2. 为订立、履行个人作为一方当事人的合同所必需，或者按照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 the conclusion or performance of a contract to which the individual concerned is a party, or for the implementation of human resources management in accordance with the labor rules and regulations formulated in accordance with the law and the collective contract concluded in accordance with the law
3. 为履行法定职责或者法定义务所必需；
Where it is necessary for the performance of statutory duties or statutory obligations;
4. 为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 it is necessary for the response to a public health emergency or for the protection of the life, health and property safety of a natural person in an emergency;
5. 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个人信息；
Where such acts as news reporting and supervision by public opinions are carried out for the public interest, and the processing of personal information is within a reasonable scope;
6. 依照法律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；
Where it is necessary to process the personal information disclosed by the individual concerned or other personal information that has been legally disclosed within a reasonable scope in accordance with relevant laws;
7. 法律法规规定的其他情形。
Other circumstances stipulated by laws and regulations.

我们从第三方获得您个人信息的情形

Obtaining your personal information from a third party

我们可能从第三方获取您授权共享的个人信息（简历信息，包括个人姓名、电话号码、工作经历等；背景调查信息，包括工作表现、上级评价等）。我们会将依据与第三方的约定、对个人信息来源的合法性进行确认后，在符合相关法律和法规规定的前提下，使用您的这些个人信息。

We may obtain the information (CV information, including name, number and working experiences, or reference check information, including working performance and line manager evaluation) shared under your authorization from a third party. We will first confirm the legality of the source of your personal information based on the agreement with a third party, and then use your personal information under the premise of complying with relevant laws and regulations.

使用您个人信息的规则

Rules for using your personal information

如果当我们要将信息用于本政策未载明的其它用途时，会事先征求您的同意或基于其他合法依据。

If we intend to use your information for other purposes not covered by this policy, we will ask for your consent in advance or follow other legitimate foundations as mentioned above.

当我们要将基于特定目的收集而来的信息用于其他目的时，会事先征求您的同意或基于其他合法依据。When we intend to use your information collected for a specific purpose for other purposes, we will ask for your consent in advance or follow other legitimate foundations as mentioned above.

您的个人信息是否会被共享、转让或披露？ Will your personal information be shared, transferred or disclosed?

为了向您提供服务，我们可能会委托第三方服务提供商帮助我们提供相关的运营和服务的支持。我们会将您的必要个人信息发送给第三方服务提供商，以提供相关技术服务，但其不能将其用于其他目的。这些服务商可能包括：

In order to provide you with relevant services, we may engage third-party service providers to assist us in providing relevant operation and service support. We will send your personal information where necessary to our service providers for them to provide relevant technical services. The service providers should not use your personal information for other purposes. The service providers may include the following types:

1. 背景调查服务供应商；
1. Reference check service provider;
2. 提供问卷、测评服务的供应商；
2. Assessment and survey service provider;
3. 技术服务提供商；
3. Technical service provider;
4. 其他适用的服务提供商。
4. Other service providers which may be applicable.

根据您适用的招聘流程，我们可能还与第三方服务商合作，以对您进行在线认知测试等。为此目的，我们可能与第三方分享您的【姓名、邮箱、手机号】以在第三方服务商平台开设相关账号。

According to the applicable recruitment process, we might cooperate with the third-party to conduct online cognitive test for you. For this purpose, we may share your [name, email, phone number] with the third-party to open relevant account on its platform.

英格卡集团向第三方分享您的个人信息的具体情况请见附件二。

Please refer to Appendix 2 for more details about how INGKA China shares your personal information.

转让 Transfer

我们不会将您的个人信息转让给任何公司、组织和个人，但以下情况除外：

We will not transfer your personal information to any company, organization or individual, except:

获得您的明确同意后或者基于其他合法依据，我们会向其他方转让您的个人信息；

After obtaining your explicit consent or based on other legitimate foundations, we may transfer your personal information to other parties;

在涉及合并、分立、解散、被宣告破产等时，如涉及到个人信息转让，我们会要求新的持有您个人信息的公司、组织继续受此政策的约束，否则我们将要求该公司、组织重新向您征求授权同意。

Due to merger, division, dissolution or declaration of bankruptcy, etc., if the transfer of personal information is involved, we will require the new company or organization holding your personal information to continue to comply with this policy; otherwise, we will ask the company or organization to seek for your permission.

公开披露 Public disclosure

我们仅会在以下情况下，公开披露您的个人信息：

We will only publicly disclose your personal information in the following circumstances:

1. 获得您单独同意后。

Your separate consent has been obtained.

2. 基于法律的披露：在法律、法律程序、诉讼或政府主管部门强制性要求的情况下，我们可能会公开披露您的个人信息。

Disclosure based on legal requirements: As required by laws, legal procedures, lawsuits or mandatory requirements of government authorities, we may publicly disclose your personal information.

您的个人信息将被如何保护？ How will your personal information be protected?

我们已使用符合业界标准的安全防护措施保护您提供的个人信息，防止数据遭到未经授权的访问、公开披露、使用、修改、损坏或丢失。我们会采取一切合理可行的措施，保护您的个人信息。

We have taken security measures conforming to the industrial standards to protect the personal information you provide and to prevent the data from being accessed, disclosed publicly, used, modified, damaged or lost without authorization. We will take all reasonable and practicable measures to protect your personal information.

我们同时要求可能接触到您个人信息的所有人员履行相应的保密义务。如果未能履行这些义务，可能会被追究法律责任或被中止与我们的合作关系。

We also require all personnel who may access to your personal information to perform the corresponding obligations of confidentiality. People who fail to perform these obligations may be investigated for legal responsibility or forced to terminate the cooperative relationship.

互联网并非绝对安全的环境，而且电子邮件、即时通讯、社交软件等与其他用户的交流方式无法确定是否完全加密，我们建议您使用此类工具时请使用复杂密码，并注意保护您的个人信息安全。

The Internet is not an absolutely secure environment, and additionally, it's not certain if the E-mail, instant messaging, social software and other communication means with other users are fully encrypted. Therefore, we suggest that you use complex passwords and pay attention to your personal information security when using such tools.

同时，我们将始终在管理、技术处理等过程中尽力确保信息安全，防止发生个人信息非法泄露，或在未经授权情况下被使用、披露、修改和删减。我们将致力于对您个人信息实施有效、得力的保护措施，使其免受各种可预见事故的危害。

At the same time, we will always try our best to guarantee the information security during the management, technical processing and other processes to prevent the personal information from being leaked illegally, or from being used, disclosed, modified or deleted without authorization. We will be committed to implementing effective and sound

measures over your personal information, to protect it from the harm of various predictable accidents.

在不幸发生个人信息安全事件后，我们将按照法律法规的要求，及时向您告知：安全事件的基本情况 and 可能的影响、我们已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。我们将及时将事件相关情况以邮件、信函、电话、推送通知等方式告知您，难以逐一告知个人信息主体时，我们会采取合理、有效的方式发布公告。

Where a personal information security incident occurs unfortunately, we will timely inform you as required by the laws and regulations: basic information and possible influences of the security incident, the treatment measures we have taken or will take, suggestions for you to prevent and reduce the risks by yourself, the remedial measures for your, etc. We will timely inform you of the related condition of the incident via mail, letter, telephone, pushed notification and other means. Where it is difficult to inform the subjects of the personal information one by one, we will publish an announcement in a reasonable and effective way.

同时，我们还将按照监管部门要求，主动上报个人信息安全事件的处置情况。

Meanwhile, we will also actively report the treatment result of the personal information security incident as required by the authority.

个人信息存储期限 Personal information storage period

我们仅在本政策所述目的所必需的期间和法律法规要求的时限内保留您的个人信息，某些个人信息根据适用的法律或规定可能有最低保留期限，即使在此期限之前该信息收集的目的已达到。

We only retain your personal information within the period necessary for the purposes of this policy and required by the laws and regulations. Some personal information is required to be retained for minimum retention period under legislation, even if the purpose of using the personal information has been served already.

除另有适用的法律或法规要求，英格卡中国将在您最后一次登录 Avature 招聘门户网站之后的 12 个月，保留您的个人档案（即你的姓名、联系方式、您与英格卡中国之间的互动日志，以及您附于个人档案中的简历），这样您便可以多次申请英格卡中国的职位。我们将在您的个人档案到期 2 周前向您的电子邮箱发送一封通知，如果您想继续保留自己的个人档案，可以再次登录网站，将自己的个人档案再续期 12 个月。在您所申请的职位招聘到相关人员之前及此后的 12 个月，您的申请表和所有相关个人信息都将由英格卡中国保管。之所以在相关职位招聘到人员之后继续保留该等信息，是为了在发生与招聘程序相关的索赔事件时保护英格卡集团的利益。如果您已同意英格卡中国在其人才数据库中保留您的申请表，我们将在征得您的同意后的 6 个月内保留您的个人档案和申请表。

Unless otherwise required by applicable laws or regulations, INGKA China will keep your personal files (i.e. your name, contact information, interactive log with INGKA China and your CV attached to your profile), so that you can apply for positions in INGKA China multiple times. We will send a notification to your email 2 weeks before your profile expires, and if you want to keep your profile, you can log in to renew your profile for an additional 12 months. Your application form and all related personal information will be retained by INGKA China until the relevant personnel are recruited for the position you are applying for and for 12 months thereafter. The reason for retaining this information after the relevant position has been recruited is to protect the interests of the INGKA Group in the event of a claim related to the recruitment process. If you have agreed to INGKA China to keep your application form in its talent database, we will keep your personal file and application form for 6 months after obtaining your consent.

您的权利 Your rights

我们将采取适当的技术手段，保证您访问、更新、更正或删除您个人信息等权利，提供与您个人信息收集、使用、分享、存储等方面相关的多种选择。

We will take appropriate technical measures to guarantee your rights to access to, update, correct or delete your personal information, and provide various choices in terms of collection, use, sharing and storage of your personal information.

访问权、复制权与更正权 Right of access, duplication and correction

您可以通过 Avature 招聘门户网站查看、复制您留下的个人信息。

You can examine and duplicate your personal information in the Avature portal.

您有权对错误或不完整的信息作出更正或更新，您可以登陆 Avature 招聘门户网站对您的个人信息进行更正或更新，同时，您也可以联系英格卡中国员工与文化团队，其会根据本隐私政策所列明的方式和期限响应您的个人信息更正、更新请求。

You are entitled to correct or update the inaccurate or incomplete information on <https://ikeachina.avature.cn>. You may also contact INGKA China People and Culture Team, who will respond to your request in accordance with the approaches and period stipulated in this Privacy Policy.

但请注意，由于技术限制或安全性考虑，您的部分个人信息我们还无法为您提供访问、复制和更正的服务。

Please be noted that we might not be capable of providing the access, duplication and correction services for some of your personal information, due to technical feasibility or security issue.

删除权 Right of deletion

如果（1）当我们违反法律法规或与您的约定处理您的个人信息；（2）当处理目的已实现、无法实现或者为实现处理目的不再必要的情形下；（3）当您个人信息的保存期限已届满；（4）当您撤回您的同意的情况下；或（5）在法律法规规定的其他情形下，您有权要求我们删除您的个人信息。如果您要求我们删除您的个人信息，而任何法律法规规定的保存期限尚未届满或者在技术上难以实现个人信息的删除，我们将停止除存储和采取必要的安全保护措施之外的处理。您可根据“任何疑问”部分所列的方式与我们联络要求进行个人信息的删除。请注意您的该项请求不会影响我们基于除个人同意外规定的其他依据继续存储、处理您的个人信息的权利。

In case (1) we breach any law or regulation or the agreement with you to process your personal information; (2) the purpose of handling your personal information has been achieved, it is impossible to achieve such purpose, or it is no longer necessary to achieve such purpose; (3) the storage period of your personal information has expired; (4) you withdraw your consent; or (5) there are other circumstances stipulated by laws and regulations, you shall be entitled to require us to delete the information.

如果您要求我们删除您的个人信息，而任何法律法规规定的保存期限尚未届满或者在技术上难以实现个人信息的删除，我们将停止除存储和采取必要的安全保护措施之外的处理。

You can contact us by the means listed in the section “Any doubt” and require the deletion of your personal information. Please note, in accordance with other legitimate foundations, we may still store or process your personal information regardless of your request.

撤销权 Right of revocation

在合理情况下，您可以联系英格卡中国信息安全与隐私保护团队改变您授权我们继续收集个人信息的范围或撤回您的授权。如果在此过程中，您需要任何帮助，可根据“任何疑问”部分所列的方式与我们联系。请注意您的该项请求不会影响我们基于除个人同意外法律规定的其他依据继续存储、处理您的个人信息的权利。

Under reasonable circumstances, you can request to adjust the authorization scope of personal information collected by us or revoke your authorization. INGKA China Information Security and Data Privacy team will respond to such request. If you need any assistance, please contact us by the means listed in the section “Any doubt”. Please note, in accordance with other legitimate foundations, we may still store or process your personal information regardless of your request.

要求我们解释您的个人信息处理规则 Request us to explain processing rules for personal information

您有权要求我们对处理您的个人信息的规则进行解释说明，您可以联系英格卡中国信息安全与隐私保护团队，或者根据“任何疑问”部分所列的方式与我们联系。

You are entitled to request us to explain processing rules for personal information. You may contact INGKA China Information Security and Data Privacy team or contact us by the means listed in the section “Any doubt”.

响应您的上述请求 Response to your above requests

为保障安全，您可能需要提供书面请求，或以其他方式证明您的身份。我们可能会先要求您验证自己的身份，然后再处理您的请求。我们将在核实您身份后的 15 个工作日内做出答复。

In order to guarantee security, you may be required to provide a written request or to prove your identity in other ways. We may ask you to verify your identify firstly before processing your request. We will respond in 15 business days after the verification.

对于您合理的请求，我们原则上不收取费用，但对多次重复、超出合理限度的请求，我们将视情收取一定成本费用。对于那些无端重复、需要过多技术手段（例如，需要开发新系统或从根本上改变现行惯例）、给他人合法权益带来风险或者非常不切实际的请求，我们可能会予以拒绝。请注意您行使上述请求不会影响我们在法律规定的其他依据上（除您的同意外）处理您的个人数据的权利。

In principle, we don't charge fees over your reasonable requests. But for requests repeated for many times and beyond the reasonable limit, we will charge certain fees for cost as appropriate. And we may reject the requests that are repeated for no reason, require excessive technical means (For example, it needs to develop a new system or change the existing practice fundamentally), present risks to the legal interests of others or are very unrealistic. Please note, in accordance with other legitimate foundations (thus, except your consent), we may still process your personal information regardless of your request.

您的个人信息如何在全球范围转移？ How is your personal information transferred globally?

原则上，我们在中华人民共和国境内收集和产生的个人信息，将存储在中华人民共和国境内。但由于英格卡集团是一家跨国公司，基于集团运营和管理的需要，您的个人信息可能会受到来自境外辖区的访问。另外，我们的授权合作伙伴可能位于境外，您的个人信息将会被转移到对应的国家/地区，或受到来自这些管辖区的访问，具体情形请见附件二。

In principle, the personal information collected and generated in the territory of the People's Republic of China will be stored in this territory. Since INGKA Group is a multinational corporation, based on the needs for group operation and management, your personal information may be accessed by employees beyond the country/region. Furthermore, since our authorized parties might be located in an overseas territory, your personal information will be transferred to corresponding county/region, or be accessed by people from such a jurisdiction. Please refer to the Appendix II for more details.

此类管辖区可能设有不同的数据保护法，甚至未设立相关法律。在此类情况下，我们会确保您的个人信息得到在中华人民共和国境内足够同等的保护。我们将始终在管理、技术处理等过程确保信息安全，防止您的个人信息受到各种可预见事故的危害。

Such jurisdiction may have different data protection laws, or even have no related law available. Under such circumstances, we will ensure to protect your personal information to an extent equivalent to that in the People's Republic of China. We will always guarantee information security during the management, technical processing and other processes, to prevent your personal information from being harmed by various predictable accidents.

本政策如何更新 How do we update this policy?

为向您提供更好的服务以及随着相关法律法规的不断发展和变化，我们可能会不定时修改本政策。我们将按照法律、法规规定的流程及要求对于涉及您的切身利益或重大事项的修改，并公示或告知您相关修改。

We may modify this policy occasionally, so as to timely reflect the changes in laws and regulations and the adjustment of our Co-worker handbook. As for the modification that is significant or concerns your vital interests, we will comply with the procedures and requirements as stipulated in laws and regulations, and will make public announcement or notify you of such modification.

任何疑问 any doubt

如果您对本政策或我们所拥有的与您相关的个人信息有任何疑问，请随时联系我们。一般情况下，我们将在核实您身份后的 15 个工作日内回复。

If you have any doubt about this policy or your personal information in our possession, please feel free to contact us. Generally, we will reply in 15 business days after verifying your identification.

电子邮件: <isdpcn@ingka.ikea.com>

E-mail: <isdpcn@ingka.ikea.com>

本隐私政策以中、英文两种文字书就，两种文本具有同等效力。如中英文文本有不一致之处，应以中文文本为准。

This Privacy Policy is written both in Chinese and English. Both versions shall be equally authentic. Where there is a discrepancy between the Chinese and English versions, the Chinese version shall prevail.

附件一：英格卡中国法律实体

法律实体名称	注册地址
宜家(中国)投资有限公司	上海市浦东新区临御路 550 号 3 层
宜家(中国)投资有限公司无锡分公司	无锡市北塘区兴源北路 600 号 2601-2、2601-3、2601-4
宜家物流服务(中国)有限公司	上海市徐汇区漕溪路 128 号 7 楼 701 室
宜家物流服务(中国)有限公司天津分公司	天津空港经济区纬十道 125 号 2 层
宜家物流服务(中国)有限公司上海松江分公司	上海市松江区洞业路 888 号 1 幢 2 层
宜家物流服务(中国)有限公司上海奉贤分公司	上海市奉贤区港文路 399 号 8 幢 2 层
英格卡商贸(上海)有限公司	上海市徐汇区漕溪路 128 号 5 楼
上海宜家家居有限公司	上海市漕溪路 126、128 号
上海宜家家居有限公司浦东分公司	上海市浦东新区临御路 550 号
上海宜家家居有限公司杨浦分公司	上海市杨浦区闸殷路 1599 号 303 室
北京宜家家居有限公司	北京市朝阳区阜通东大街 59 号
广州宜家家居有限公司	广州市天河区黄埔大道东 663 号首层、二层东侧及整栋(部位:1-3 楼 1F001、2F001、3F001)
成都宜家家居有限公司	四川省成都市高新区站华路 9 号
深圳宜家家居有限公司	深圳市南山区北环大道 8188 号一、二层
南京宜家家居有限公司	南京市秦淮区明匙路 99 号
大连宜家家居有限公司	大连市西岗区海达南街 51 号
沈阳宜家家居有限公司	沈阳市铁西区兴华北街 20 号
天津宜家家居有限公司	天津市东丽区津塘公路 433 号
无锡宜家家居零售有限公司	无锡市锡山经济开发区团结中路 1 号及连桥
上海宝山宜家家居有限公司	上海市宝山区沪太路 1818 号
重庆宜家家居有限公司	重庆市北部新区汇流路 2 号
宁波宜家家居有限公司	浙江省宁波市鄞州区宜园路 525 号
宁波宜家家居有限公司温州分公司	浙江省温州市瓯海区温瑞大道 999 号华润万象城商业街 S149-159, X105-114, S249-259, X205-214 号

武汉宜家家居有限公司	湖北省武汉市硚口区张毕湖路 2 号
杭州宜家家居有限公司	杭州市余杭区乔司街道乔莫西路 5 号
成都成华宜家家居有限公司	成都市成华区蓉都大道将军碑路 9 号
北京西红门宜家家居有限公司	北京市大兴区西红门宏福西路临 2 号
北京西红门宜家家居有限公司海淀商贸分公司	北京市海淀区复兴路 69 号院 2 号 001 室
西安宜家家居有限公司	陕西省西安市沣东新城三桥路 866 号
佛山宜家家居有限公司	佛山市南海区桂城街道桂澜北路 18 号
哈尔滨宜家家居有限公司	哈尔滨市南岗区复旦街 48 号
苏州宜家家居有限公司	苏州高新区浒墅关镇城际路 17 号
苏州宜家家居有限公司上海杨浦分公司	上海市杨浦区三门路 99 号一层 112 室及二层整层; 闸殷路 1555 号 2 层 242 单元
苏州宜家家居有限公司上海静安分公司	上海市静安区南京西路 1716-1720 号(双)1-3 层, 南京西路 1728-1746 号(双)1 幢 2 层、3 层 A1、3 层 A2, 南京西路 1728-1746(双)号 2 幢 1-3 层
南通宜家家居有限公司	南通市港闸区黄海路 66 号
济南宜家家居有限公司	山东省济南市槐荫区烟台路 121 号
广州广番宜家家居有限公司	广州市番禺区东环街东艺路 139 号 15 栋
天津中北宜家家居有限公司	天津市西青区中北镇万卉路 7 号
徐州宜家家居有限公司	徐州经济技术开发区和平路 128 号
郑州宜家家居有限公司	郑州市惠济区长兴路 2 号
宜家电子商务(中国)有限公司	上海市徐汇区漕溪路 128 号 4 楼 401 室
贵阳宜家家居有限公司	贵州省贵阳市观山湖区金清大道 2 号
南宁宜家家居有限公司	南宁市良庆区歌海路 9 号广西体育中心配套工程综合体东塔楼 A、B 座办公楼 12 楼 1218 号
青岛宜家家居有限公司	山东省青岛市崂山区深圳路 100 号
福州宜家家居有限公司	福建省福州市晋安区福马路 788 号
昆明宜家家居有限公司	云南省昆明市五华区学府路 690 号金鼎科技园十八号平台办公楼 1 楼 102-436 号
长沙宜家家居有限公司	湖南省长沙市岳麓区洋湖路 253 号 B1、L1、L2 层[1A1ST, 2A1ST]号
长春宜家家居有限公司	吉林省长春市宽城区热电小区 1 号楼 102 室
合肥宜家家居有限公司	合肥市庐阳区蒙城北路 139 号海棠花园商业用房(二) 225-226 室
宜家物流服务(天津)有限公司	天津市宝坻区牛道口镇产业功能区二号路 2 号
英格卡购物中心(中国)管理有限公司	上海市徐汇区漕溪路 128 号 6 楼 601 室
无锡英格卡购物中心有限公司	无锡市锡山经济开发区团结中路 3 号

北京英格卡购物中心有限公司	北京市大兴区欣宁街 15 号
武汉英格卡购物中心有限公司	武汉市硚口区长宜路 1 号
长沙英格卡购物中心有限公司	湖南省长沙市岳麓区洋湖路 253 号
上海英格卡购物中心有限公司	上海市长宁区广顺路 33 号 8 幢 1 层 1416 室
西安英格卡购物中心有限公司	陕西省西安市雁塔区西沔二路城市综合改造办二楼
珙兹能源科技发展（上海）有限公司	上海市徐汇区漕溪路 128 号 7 楼 703 室

附件二：涉及个人信息分享相关方列表

第三方实体名称	联系方式	分享的个人信息种类	处理目的	是否涉及出境
凯莱德（北京）信用管理有限公司	北京市东城区龙潭湖路 3 号院 22 幢一层 101 室	姓名、性别、出生日期、身份证号、手机号码、教育信息核实、就业信息核实、全国违规记录调查、商业利益冲突调查、民事诉讼记录、工作能力评估	为了核实候选人资料的真实性以及评估与申请职位的匹配性	否
Predictive Index, LLC	101 Station Drive Westwood, MA 02090	姓名、邮箱	为了评估候选人与申请职位的匹配性	是
前锦网络信息技术（上海）有限公司	中国（上海）自由贸易试验区商城路 660 号 乐凯大厦 2307 单元	姓名、邮箱、手机号码	为了评估候选人与申请职位的匹配性	否