

Privacy Policy | 隐私条款

Introduction

Your privacy is important to us, and we are committed to ensuring that your personal information is protected.

This Privacy Policy explains how we collect, use and disclose the personal information that we collect from you or which we have obtained about you from a third party. It sets out various rights that you have in relation to that personal information. Please take a moment to read and understand it.

This Privacy Policy explains:

- how we collect personal information;
- the kind of personal information we collect;
- how we use, and may share, your personal information;
- how we use cookies and log files;
- responsibility for personal information collected through linked third party websites;
- how you can access/amend your personal information;
- how long we hold personal information;
- who you can contact for further information; and
- additional terms that apply to some residents of the European Economic Area.

In this Privacy Policy:

- “we” means Simpson Grierson or any related company providing you with our products or services;
- “you” means you, the person purchasing or using our products or services, providing us with personal information, visiting our website, or using our online portal for customer due diligence;
- “products and services” means all products and services we provide and anything else we do for you, including providing you with access to our website or online portal for customer due diligence; and
- “website” means our website accessible at www.simpsongrierson.com, or associated websites or pages, including any data room or online portal that we may make available to clients or potential clients.

We may modify or amend this Privacy Policy at any time and for any reason. You can view our most current Privacy Policy on our website.

引言

你的隐私对我们而言很重要，我们致力于确保你的私人信息得到保护。

这个隐私条款将说明我们如何收集、使用以及透露我们从你那里得到的个人信息，或者我们从第三方那里得到的有关你的个人信息。它列出了你对这些个人信息所拥有的各种权力。请花一些时间阅读并理解其内容。

这个隐私条款解释了：

- 我们如何收集个人信息；
- 我们收集何种个人信息；

- 我们如何使用，而且有可能共享，你的个人信息；
- 我们如何使用小型文字档案以及日志文件；
- 从相关联的第三方网站上收集而来的个人信息的职责问题；
- 你如何能够获取/修改你的个人信息；
- 我们持有个人信息的时长；
- 你可以联系谁来得到进一步的信息；以及
- 适用于某些欧共体区域居民的附加条款。

在这个隐私条款中：

- “我方”意指 Simpson Grierson 以及所有向你方提供我方产品或服务的关联公司；
- “你方”意指你，即购买或使用我方产品或服务、向我方提供个人信息、浏览我方网站，或使用我方在线入口进行客户尽职调查的人士。
- “产品及服务”意指我方所提供的所有产品和服务，任何其它我们为你方所作之事，包括向你方提供我们的网站登录以进行客户尽职调查；及
- “网站”意指我方的网站 www.simpsongrierson.com，或者相关联的网站及网页，包括任何我们可能让客户或潜在客户使用的数据库及在线入口。

我们可能随时因为任何原因调整或修改本隐私条款。你可以在我们的网站上看到我们最新的隐私条款。引言

How we collect personal information

We collect personal information in the following ways:

- directly from you or from third parties acting on your authority or who you authorise us to make contact with about you:
 - when you contact us seeking information about us, our products or services or anything on our website (including when you register on our website to receive our news and updates service or to access information made available only to registered users);
 - in the course of conducting customer due diligence;
 - in the course of providing our products and services to you; or
 - when you apply to work at Simpson Grierson;
- publicly available information searched as part of carrying out customer due diligence or as part of the provision of our products or services to you;
- indirectly through your use of our website and the services and functionality offered through it;
- the agents and service providers that we may engage to assist us with fulfilling any of the purposes recorded in this policy; and
- third parties connected with the substance of the matter(s)/purpose(s) for which you have engaged us.

我们如何收集个人信息

我方通过以下方式收集个人信息：

- 直接从我方、从我方授权为我行事的第三方处、或者从我方授权我们与之联系的第三方处；
 - 当你联系我方寻求有关我方的信息、我方的产品和服务或者我们网站上的任何东西（包括当你在我方网站上注册以获取我方新闻及更新服务，或者获取只有注册用户可以得到的信息）；
 - 在进行客户尽职调查的过程中；
 - 在向你方提供我们的产品和服务的过程中；或
 - 当你向Simpson Grierson 申请职位之时；
- 在进行客户尽职调查或者作为我方提供产品或服务的一部分的搜索中，可以公开得到的信息；
- 间接通过你方使用我们的网站及其提供的相关服务及功能；
- 我们可能聘用的代理人或服务提供商，来协助我们达成记录在此项条款中的目的；以及
- 与你方委托我们的事件之实质/目的有关联的第三方。

The kind of personal information we collect

We collect only the personal information (including for example your name, date of birth, address, email address, and contact telephone numbers) you give us, and as acquired through the other sources or means mentioned above. We may also keep a record of any information that you acquire from us.

If you are providing us with personal information about someone else, it may be necessary to make sure that person is aware that our acting for you may involve collecting, using, and disclosing their personal information. Please ensure you comply with your privacy obligations relating to the personal information of others that you provide to us. We can discuss this with you if the matter arises.

You do not have to provide us with, or allow us to collect, your personal information, but if we are unable to collect all or any of your personal information that we request from time to time, then we may be unable to provide our products and services to you.

For example, we may be required by law, including under the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, to collect your identity information, and if you do not provide us with this information, we may be unable, by law, to provide our services to you.

我方收集的个人信息之种类

我方只收集你方提供的个人信息（包括比如你的姓名、生日、地址、邮箱和联系电话号码），以及通过前面提到过的其它方式或渠道获得的信息。我们也可能保留一份你从我方获得的所有信息的记录。

如果你向我方提供有关其它人士的个人信息，有可能需要确保那位人士知道，在我方为你工作时，有可能涉及收集、使用和透露其个人信息。请在提供给我们其它人士之个人信息之时，确保你方遵守你们的隐私义务。我们可以在出现此类情况时与你方讨论。

您不必向我们提供或允许我们收集您的个人信息，但如果我们无法收集所要求的您的全部或任何个人信息，那么我们可能无法提供我们的产品和服务给您。

例如，根据 2009 年《反洗钱和打击资助恐怖主义法》等法律，我们可能需要收集您的身份信息，如果您不向我们提供此信息，我们可能无法依法为您提供我们的服务。

How we use, and may share, your personal information

We use your personal information for the following purposes:

- to verify your identity, perform customer due diligence and for other administrative purposes;
- to reply to your queries;
- to carry out your instructions, deliver our products and services to you and otherwise fulfil our professional duties;
- to improve, develop, market and provide information about us and our products and services (subject to any confidentiality requirements), including:
 - working with you to develop ways in which we can improve our products and services and the way we deliver them, for you specifically and generally; and
 - addressing any particular matters you raise with us in connection with our products and services;
- for recruitment purposes, including assessing a candidate's suitability for a position with us;
- to enforce our agreements with you (including to supply, and invoice for, products and services ordered by you, and to collect payment);
- to protect our rights, property or safety or those of third parties, including our employees, contractors, other clients, and users of our website or our products or services;
- any specific purpose which we notify you of at the time personal information is collected; and
- to comply with any legal requirement, including any applicable law, court order, other judicial process, or the requirements of a regulator, and as otherwise required or permitted by law.

In providing our products and services to you, or in carrying out any of the other functions mentioned above, we may also disclose your personal information to our contractors or agents, and other organisations, including:

- other parties involved in the matter(s)/purpose(s) for which you have (or a client with whom you are connected has) engaged us;
- identification verification and screening agencies (each an intermediary) (who may temporarily hold such information for the purposes of process audit and error checking);
- any document issuer, official record holder, credit bureau and authorised third parties' data providers (data provider), for the purposes of customer due diligence (who may retain a record of the fact that we or an intermediary has requested a data comparison);
- credit reporting agencies (who may retain the personal information we share with them on their databases for use in the provision of their credit reporting services);
- third party service providers such as:
 - IT systems or services providers;
 - data management, processing and storage service providers;

- auditors;
- banks and other financial service providers;
- third parties engaged in the course of providing our services (such as barristers, mediators, arbitrators, witnesses and subject-matter experts);
- service providers that assist us with client insight analytics;
- a court or tribunal;
- regulatory and enforcement agencies;
- government agencies; and
- as otherwise authorised by you.

We do not sell information that identifies you personally.

我们如何使用并可能共享你的个人信息

我们为以下目的使用你的个人信息：

- 为核实你的身份, 进行客户尽职调查以及其它管理目的;
- 为回复你的咨询;
- 为执行你的指令、向你提交我们的产品和服务, 以及履行我们的专业职责;
- 为改进、发展、营销和推广我们的产品和服务 (受限于任何保密要求), 包括:
 - 与你方一起工作, 专门为你方或者从普遍意义上, 找到改进我方产品和服务的方法, 以及我方完成任务的方法; 以及
 - 解决你方就我们的产品和服务提出的任何特殊问题;
- 为招聘新人的目的, 包括评估申请人是否适合在我方担任某一职位;
- 为执行我们双方之间的协议 (包括提供你方订货及服务并开具发票, 以及收取付款);
- 为保障我们或者第三方的权利、财物或安全, 包括我方职员、合同方、其它客户, 以及我方网站或我方产品及服务之用户;
- 为任何我们在收集个人信息时告知你方的特别目的; 以及
- 为遵循所有法律的要求, 包括任何适用之法律, 法庭命令、其它司法程序和监管者之要求, 以及除此以外依法要求或许可之事项。

在向你方提供产品和服务时, 或者在执行任何以上提到的其它机能时, 我方可能会将你的个人信息透露给我们的合同方或代理人, 以及其它组织, 包括:

- 与你方委托我们的事件之实质/目的有关联的其它方 (或与您有联系的客户);
- 身份核实以及筛查机构包括信用报告机构 (每机构为中间人) (可以临时为了审核过程和错误检查的目的保存此类信息);
- 任何文件发行人, 正式记录持有人, 征信机构和授权的第三方数据提供者 (数据提供者) 为了客户尽职调查的目的 (可以保留我们或中介机构要求进行数据比较的记录);
- 信用报告机构 (他们可能会将我们与他们共享的个人信息保留在其数据库中, 以用于提供其信用报告服务);
- 第三方服务提供商比如:
 - IT 系统和服务提供商;
 - 数据管理、处理和存储服务提供商;
 - 审计员;
 - 银行以及其它金融服务提供者;

- 在提供我方服务过程中聘用的第三方 (比如出庭律师、调解员、仲裁员、证人以及相关事件的专家); 以及
- 帮助我方进行客户观点分析的服务提供商;
- 为法院或者特别法庭;
- 为监管及执行机构;
- 为政府部门; 以及
- 经您另行授权。

我方不会出售那些能够暴露你个人身份的信息。

How we use cookies and log files

We use cookies, log files and other technologies to collect personal information from the hardware and software you use to access our website or receive our news updates.

A cookie is a small data file that the website sends to your browser, which may then store it on your system for later retrieval by the website. Cookies track your movements through different websites; they do not record any other personal information about you. Cookies are widely used on websites to help with navigation and to help personalise your experience when you visit a website.

We also use cookies in our electronic direct mail messages, including any newsletter updates you may subscribe to. These cookies help us gain insight about the content we send and how it is received, which in turn helps us to improve the content we create and the way we deliver it to you.

If you reject cookies, you may still use our website and/or receive our electronic direct mail messages, but your experience may be affected, and your ability to use some areas of our website may be limited.

To find out more about the way cookies work, how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

In addition to cookies, we use Google Analytics to understand and optimise user experience and to improve our advertising. This tracking software collects and analyses certain types of information, including cookies, IP addresses, device and software identifiers, referring and exit URLs, onsite behaviour and usage information, and other similar information. We and Google Analytics may also use cookies to anonymously track and target advertising based on your browsing behaviour. You can see how Google uses data when you access our website [here](#).

We may use non personalised statistics about the use of or website to monitor site traffic, to analyse trends, to gather demographic information about our user base as a whole, to improve our website and to improve website user experience. These anonymised and/or amalgamated statistics do not comprise personal information.

如何使用小型文字档案以及日志文件

我方使用小型文字档案、日志文件以及其它技术, 在你用来登录我们网站或接收我方新闻更新的硬件和软件上, 收集个人信息。

一个小型文字档案是一个网站发送给你的浏览器的小型的数据文件, 能在你的系统中存储数据以待网站收回。小型文字档案追踪你在不同网站之间的活动轨迹; 它们不记录有关你的任何其它个人资料。小型文字档案在网站上被广泛应用来帮助导航, 以及在你访问网站时帮助使你的体验个性化。

在我们的电子直邮信息中，我们也使用小型文字档案，包括所有你可能订阅的时事通讯更新。这些小型文字档案帮助我们获得对我们所发内容的观察，以及这些内容的接收情况，从而帮助我们改善我们制作的内容以及我们提交给你的方式。

如果你拒绝小型文字档案，你仍然可以使用我们的网站并且/或者收到我们的电子直邮信息，但你的体验可能会受影响，而且你使用我们网站某些区域的能力可能会受到限制。

要想知道更多关于小型文字档案工作的方式，如何看到哪些小型文字档案被设置以及如何管理及删除它们，请访问www.allaboutcookies.org。选择退出谷歌分析在所有网站上的追踪，请访问<http://tools.google.com/dlpage/gaoptout>。

除了小型文字档案之外，我们还使用谷歌分析来理解和优化用户体验，以及改善我们的广告营销。这个追踪软件收集并分析某些种类的信息，包括小型文字档案、IP 地址、设备及软件标识、提交及退出URL、现场行为及使用信息，以及其它类似的信息。我方以及谷歌分析可能还会使用小型文字档案，针对你的浏览习惯进行匿名追踪和目标性营销。你登录到我们网站的时候，可以在这里看到谷歌如何使用数据。

我们可能运用非个性化、有关网站使用的统计数据，来监控网站流量、分析趋势、采集我们网站用户的整体人口信息，进而改善我们的网站和用户体验。这些隐去名字而且/或者合并了的统计数据不会损害个人信息。

Responsibility for personal information collected through linked third party websites

Our website, news updates or other communications to you, may contain links to third party websites. Unless expressly stated otherwise, these websites have not been developed by and are not controlled by us. They are provided for your convenience only, and do not imply that we check, endorse, approve or agree with the privacy practices of the third party websites linked to. We encourage you to be aware when you leave our website and to read the privacy statements of each and every website that you visit.

More information about our website, and the terms of use applicable to it, can be found [here](#).

从相关联的第三方网站上收集而来的个人信息的职责问题

我们的网站、新闻更新或者其它与你方的通讯，可能包含了与第三方网站的链接。除非明确说明，否则这些网站不会是我方开发的，也不受我方控制。提供这些链接仅仅是为了你的方便，并不意味着我方查验、支持、批准后赞同所联第三方网站有关隐私的作法。我方提倡在你离开我方的网站时多加小心，阅读每一个你访问的网站的隐私条款。

更多有关我方网站的信息，以及相关的使用条款，可以在这里找到。

How you can access/amend your personal information

You may request access to any of your personal information we hold by emailing us at privacy.officer@simpsongrierson.com. Subject to any lawful grounds for withholding, we will provide you with a copy of the personal information we keep about you.

You may request that the personal information we hold about you be corrected by emailing us at privacy.officer@simpsongrierson.com. If we agree that your personal information is to be corrected, we will do so.. If we do not correct your personal information, you also have a right to provide a statement of correction sought, and we will ensure that your correction request will be kept with the personal information held.

你如何能够获取/修改你的个人信息

你可以要求获取我们持有的你的任何个人信息，通过给我们发邮件到privacy.officer@simpsongrierson.com。如果我们同意更正您的个人信息，我们会这样做。如果我们不更正您的个人信息，您也有权提供更正请求的声明，我们将确保您的更正请求与我们所持有的个人信息一并保存。

How long we hold personal information

We will keep your personal information only for as long as necessary to achieve the purpose for which it was collected.

If your personal information is no longer required by us, we will either destroy the information or de-identify it so it cannot be attributed to you personally.

我们持有个人信息的时长

我们持有个人信息的时间长短，仅限于为达到当初收集该数据的目的所需要的时间。

如果我们不再需要你的个人信息，我们要么会毁掉这个信息或者抹去标识，这样这个信息就不会联系到你个人。

Who you can contact for further information

If you have any queries about this Privacy Policy or personal information we have collected please contact:

Privacy Contact Person: Privacy Officer

Email address: privacy.officer@simpsongrierson.com

Address: Simpson Grierson
Level 27, 88 Shortland Street
Auckland 1010, New Zealand

Postal Address: Simpson Grierson
Private Bag 92518, Wellesley Street
Auckland 1141, New Zealand

你可以联系谁来得到进一步的信息

如果你对此隐私条款或者对我们收集的个人信息有任何疑问，请联系：

隐私联系人 隐私办事员

邮箱：privacy.officer@simpsongrierson.com

地址：**Simpson Grierson**
Level 27, 88 Shortland Street
Auckland 1010, New Zealand

邮寄地址：**Simpson Grierson**
Private Bag 92518, Wellesley Street
Auckland 1141, New Zealand

Additional terms that apply to some residents of the European Economic Area (EEA)

In addition to the rights already recorded above, if you are based in the EEA, you may have the following additional rights in relation to the personal information we hold about you:

- **Right to erasure**
You can ask us to delete or remove your personal information in some circumstances, such as where we no longer need it or, if we are relying on your consent to process the information, you withdraw your consent. If you are entitled to erasure we will comply with your request. If we have shared your personal information with others, we will let them know about your request where reasonably possible. If you ask us, where it is reasonably possible and lawful for us to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- **Right to restrict processing**
You can ask us to 'block' or suppress the processing of your personal information in certain circumstances, such as where you contest the accuracy of that personal information or you do not want us to erase your information but require restriction of processing instead. If you are entitled to restriction of processing of your personal information, and we have shared your personal information with others, we will let them know about the restriction where it is reasonably possible for us to do so. If you ask us, where it is reasonably possible and lawful for us to do so, we will also tell you who we've shared your personal information with so that you can contact them directly.
- **Right to data portability**
You have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.
- **Right to object**
You can ask us to stop processing your personal information, and we will do so, if we are:
 - relying on our own or someone else's legitimate interests to process your personal information, except if we can demonstrate compelling legal grounds for the processing; or
 - processing your personal information for direct marketing purposes.
- **Right to withdraw consent**
If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- **Right to lodge a complaint with the supervisory authority**
If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the relevant Supervisory Authority in the EEA.

Please be aware that some of these rights may be limited or unavailable where we have an overriding interest or legal obligation to continue to process the data, or where data may be exempt from disclosure due to reasons of legal professional privilege or professional secrecy obligations.

Your personal information may be processed by our third party providers in Australia and Hong Kong. The European Commission has not recognised either Australia or Hong Kong as providing adequate protection. We have enforceable contractual arrangements with these third party

providers to ensure appropriate safeguards are in place to protect your personal information. Please email us at privacy.officer@simpsongrierson.com if you would like to obtain a copy of the safeguards in place with our third party providers.

适用于某些欧共体区域居民的附加条款

除上述权利以外,如果你住在欧共体区域,针对我们持有的你的个人信息,你可能有下述附加权力:

- **删除权**
在某些情况下,你可以要求我方删除或移除你的个人信息,比如当我方不再需要此信息或者,当我方依赖于你方的同意来处理此信息,而你方撤销了此项同意。如果你有权要求删除,我方将遵循你的要求。如果我方已经和他人共享了你的个人信息,我们将尽力在可能的情况下,转达你的请求。如果你询问我们,我们将在合理的、法律允许的情况下,告诉你我们和谁共享了你的个人信息,以便你和他们直接联系。
- **限制处理权**
在某些情况下,你可以要求我方“封锁”或者取缔对你的个人信息的处理,比如当你对你个人信息的准确性有争议,或者你不想要我方删除你的个人信息但要求对处理进行限制。如果你有权限制处理你的个人信息,而我们已经与他人共享了你的个人信息,我们将在合理、可能的前提下,转告他们这项限制。如果你询问我们,我们将在合理的、法律允许的情况下,告诉你我们和谁共享了你的个人信息,以便你和他们直接联系。
- **数据转移权**
在某些情况下,你有权获取你已经提供给我方的个人信息(以机构化的、普遍应用的而且机器可读的形式)而且在其它地方使用,或者要求我方将此信息转移至你所选择的第三方。
- **反对权**
你可以要求我方停止处理你的个人信息,我方在下列情况下将遵循:
 - 如果我方依赖于我们自己的或者其它人的合法权益来处理你的个人信息,除非我们可以证实存在压倒性的法律基础来继续此项处理;或者
 - 为了直接的营销目的处理你的个人信息。
- **撤销同意权**
如果我们依赖于你的同意作为我们处理你的个人信息的基础,你有权随时撤销此项同意。
- **向监管机构投诉的权力**
如果你对我们隐私方面的作法有疑虑,包括我们处理你的个人信息的方式,你可以向相关的EEA监管机构报告。
请注意,在我方拥有更主要的利益或者法律责任来继续这些数据的管理,亦或当数据由于法律专业特或职业保密责任而可能免于透露时,这些权力中的一些项目可能受限或者不可用。
你的个人信息可能被我们位于澳洲或者香港的第三方供应商来处理。欧盟执委会还没有承认澳洲或香港所提供的保护是充分的。我们与这些第三方供应商有可执行的条约安排来保证适当的安全防护措施来保障你的个人信息。如果你想得到一份我们和第三方拟定的安全防护措施的复印件,请发邮件给我们 privacy.officer@simpsongrierson.com。

Auckland

Level 27, 88 Shortland Street
Private Bag 92518
Auckland 1141
New Zealand
+64 9 358 2222

Wellington

Level 5, 40 Bowen Street
PO Box 2402
Wellington 6140
New Zealand
+64 4 499 4599

Christchurch

Level 1, 151 Cambridge Terrace
West End, PO Box 874
Christchurch 8140
New Zealand
+64 3 365 9914