

Privacy Policy (China Addendum)

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Addendum to the Privacy Policy (notice to persons in China)

This Addendum is provided and applies solely to persons who reside in China in accordance with the Personal Information Protection Law (the “PIPL”) and the regulations of the Chinese Cyberspace Administration (the “CAC”) and should be read in conjunction with our [Privacy Policy](#). This Addendum applies where Control Risks processes personal information within the territory of mainland China and within the scope of laws related to personal information protection including the PIPL and its relevant regulations and national standards.

The terms contained herein are specific to the processing of your personal information under the PIPL and shall not be interpreted as establishing rights or obligations required beyond applicable legal or regulatory requirements in jurisdictions outside of mainland China where Control Risks operates or where the PIPL does not apply.

Terms which are undefined shall have the meanings ascribed to them in the PIPL or the Privacy Policy. Where there is a conflict between the Privacy Policy and this Addendum, the terms of this Addendum shall apply solely with regards to persons who reside in China.

The Legal Basis for Processing Personal Information

Under the PIPL, Control Risks processes personal information on the following legal basis:

- I. where we have your consent;
- II. where it is necessary for the conclusion or performance of a contract to which you are a party, or to implement human resources management in accordance with labour rules and regulations formulated according to law and collective contracts concluded according to law;
- III. where it is necessary for the performance of statutory duties or statutory obligations;
- IV. where it is necessary for coping with public health emergencies or for the protection of the life, health and property of a natural person;
- V. where the personal information disclosed by you or otherwise legally publicly available information is processed within a reasonable scope in accordance with the provisions of PIPL; and
- VI. other circumstances provided by laws and administrative regulations.

Data Subject's Rights

Under the PIPL, visitors, users, and others who reside in China may have certain rights regarding their personal information, which differ from or are supplemental to those listed in the Privacy Policy, including:

Right of non-discrimination

Control Risks cannot discriminate against you or deny you services for withdrawing your consent for the processing of your personal information, unless that processing is necessary for the performance of a contract you are party to with Control Risks.

Right to refuse automated decision making

You have the right to opt out or refuse to have your personal information used to make automatic decisions. Control Risks does not use personal information in automated decision making. If you have questions about automated decision making at Control Risks, please contact us.

More information

You can exercise any of the above rights by contacting us using any of the methods in the "Contact" section of the Privacy Policy.

If you are not satisfied about the way in which your information is handled, you have the right to lodge a complaint to the CAC.

This Addendum is subject to changes, amendments, or may be supplemented from time to time. New versions will be published on our website and will be effective immediately upon publication. Changes may also be communicated via email. Please check this page occasionally to see any updates or changes.

For any questions regarding this Addendum, please contact us using the details in the "Contact" section of the Privacy Policy.