



PORSCHE

关于保时捷（中国）汽车销售有限公司举报系统的隐私声明

Privacy Notice regarding

Whistleblower System of Porsche (China) Motors Ltd.

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保时捷（中国）汽车销售有限公司（“我们”或“保时捷”）通过适当的合规组织、合规流程及预防和应对可能的违法行为的其他措施，确保遵守适用法律法规。这些措施包括（但不限于）我们在中国（在本隐私声明中，仅指中华人民共和国大陆地区，不包括香港、澳门和台湾地区）当地实施和运作举报系统。保时捷员工（“员工”）和外部人员可使用该举报系统向我们举报（“举报”）可能违反法律要求或内部规章（“违反”）的行为，由此促进发现和追究该等违反行为。

Porsche (China) Motors Ltd. ("we" or "Porsche") ensures compliance with applicable laws and regulations through an appropriate compliance organization, legally compliant processes and other measures to prevent and react to possible violations of law. These measures include (without limitation) the implementation and operation of a Whistleblower System by us locally in China (which, for the purpose of this Privacy Notice, refers solely to the mainland of the People's Republic of China, excluding Hong Kong, Macau and Taiwan). The employees of Porsche ("employees") and external parties can use the Whistleblower System to inform (via "tip") us about possible violations of legal requirements or internal regulations ("violations") and thus contribute to their detection and prosecution.

我们特此向您告知：我们会在运作举报系统的过程中收集和处理您的个人信息。“个人信息”是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。我们会仅根据适用的个人信息保护法律法规（尤其是《中华人民共和国个人信息保护法》（“《个人信息保护法》”））的要求，在举报系统的范围内收集和处理个人信息。本隐私声明亦包含有关用于调查在运作举报系统的过程中收悉的举报信息的个人信息处理活动（“调查措施”）的更多信息。就我们的员工而言，这是对我们关于劳动关系的一般隐私声明的补充。**您确认并同意：我们可以根据本隐私声明的规定，为本隐私声明所述的目的收集和处理您的个人信息。**

We hereby inform you about the collection and processing of your personal information in the course of the Whistleblower System. "Personal information" means all types of information, whether recorded in electronic or other forms, relating to an identified or identifiable natural person, excluding anonymized information. We will collect and process personal information within the scope of the Whistleblower System only in accordance with the applicable personal information protection laws and regulations. These requirements result in particular from the PRC Personal Information Protection Law ("PIPL"). This Privacy Notice contains further information on personal information processing activities which serve to investigate tips received in the course of the

Whistleblower System ("investigatory measures"). Insofar as our employees are concerned, it supplements our general Privacy Notice for the employment relationship. **You acknowledge and agree that we may collect and process your personal information for the purposes described in this Privacy Notice and in accordance with the provisions hereof.**

1. 由谁负责收集和处理您的个人信息？

Who is responsible for collecting and processing your personal information?

根据《个人信息保护法》第七十三条第（一）款，个人信息处理者为：

The personal information processor in accordance with Art. 73(1) of the PIPL is:

保时捷（中国）汽车销售有限公司

中国（上海）自由贸易试验区世纪大道826号17层（实际楼层：15层）

compliance@porsche.cn

Porsche (China) Motors Ltd.

17/F (actual floor: 15), No. 826 Century Avenue

China (Shanghai) Pilot Free Trade Zone, PRC

compliance@porsche.cn

您可以邮寄信函至上述地址或发送电子邮件至compliance@porsche.cn联系我们的个人信息保护专员。

You can contact our **officer in charge of personal information protection** at the address above or at compliance@porsche.cn.

2. 关于收集和处理您的个人信息的背景信息

Background information regarding the collection and processing of your personal information

我们必须确保在我们的业务经营范围内遵守适用法律。此外，作为保时捷和大众汽车集团的一员，我们将配合Dr. Ing. h.c. F. Porsche AG、Volkswagen AG及保时捷和大众汽车集团中的其他集团公司遵守其法律、监督和合规义务。例如，这适用于刑法、民法、行政法、税法、个人信息保护法、公司（或同等）法、证券法、劳动法、反垄断法的规定及其他有约束力的法律规定。

We must ensure compliance with applicable laws within the scope of our business operations. In addition, we, as one of the companies within the Porsche and Volkswagen group, will cooperate with Dr. Ing. h.c. F. Porsche AG, Volkswagen AG and other group companies within the Porsche and Volkswagen group in their compliance with legal, supervisory and compliance obligations. This applies, for example, to provisions of criminal law, civil law, administrative, tax law, personal information protection law, company (or equivalent) law, securities law, labor law, antitrust law and other binding legal provisions.

如果我们不充分遵守这些法律要求，可能会导致不利情况，比如遭致罚款或监禁、行政罚款、损害赔偿索赔或声誉受损。为遵守这些法律义务，我们采取了适当措施，确保保时捷和大众汽车集团内部遵守法律要求或内部规章。这些措施包括（但不限于）实施和运作我们在中国当地执行的举报系统。

If we do not sufficiently comply with these legal requirements, disadvantages, such as monetary penalty or

imprisonment, administrative fines, claims for damages or damage to our reputation may result. In order to comply with these legal obligations, we therefore take appropriate measures to ensure compliance with legal requirements or internal regulations within the Porsche and Volkswagen group. These measures include (without limitation) the implementation and operation of a Whistleblower System that is operated by us locally in China.

员工有义务根据保时捷集团“P50举报系统”指引，向我们报告可能的违反行为。报告可能的违反行为的员工和外部人员（“**举报人**”）可以通过内部和外部渠道进行举报。我们已采取适当的措施确保及时有效地跟进收悉的信息。

Employees are obliged to inform us about possible violations according to the Porsche Group Directive No. “P50 Whistleblower System”. Employees and external persons who report a possible violation (“**whistleblowers**”) can use internal and external channels to report possible violations. We have taken appropriate measures to ensure that the information received is followed up promptly and effectively.

除在中国当地实施的举报系统外，构成保时捷全球举报系统一部分的各个举报渠道和Dr. Ing. h.c. F. Porsche AG或保时捷集团中的其他集团公司落实的举报流程程序的更多详细信息可通过内网（Info-Welt / Porsche Compliance）或www.porsche.com/whistleblower-system查看。

More detailed information on the various whistleblowing channels and the procedure of a whistleblowing process operated by Dr. Ing. h.c. F. Porsche AG or other group companies with the Porsche group, which are part of Porsche's global whistleblower program in addition to this Whistleblower System operated locally in China, can be found on the intranet at Info-Welt / Porsche Compliance or under www.porsche.com/whistleblower-system.

3. 我们收集和处理您的个人信息的目的

For what purposes do we collect and process your personal information?

我们根据适用法律处理您的个人信息，特别是为了下述特定的合规和调查目的：

We process your personal information in compliance with applicable laws, in particular for the following specific compliance and investigatory purposes:

- **审核举报的合理性：**我们会审核举报人提供的信息是否看似合理并表明保时捷员工或业务合作伙伴存在违反行为。处理您的个人信息的目的之一是实施该等合理性审核。

Review the plausibility of tips: We will review, *among other things*, whether the information provided by the whistleblowers appears plausible and indicates a violation by an employee or business partner of Porsche. The processing of your personal information serves *among other things* this plausibility review.

- **调查不当行为：**调查措施可用于发现并解决保时捷员工和外部人员在履行职责时可能违反合同义务或劳动规章制度的行为或犯罪行为，以及在公司内部的其他违规行为和投诉/不满。例如，这涉及对欺诈、腐败、税务犯罪、反垄断违规、洗钱或其他经济犯罪或违反保时捷行为守则的行为进行调查和制裁。

Investigation of misconduct: Investigatory measures can serve to uncover and resolve possible violations of contractual obligations or employment policies or criminal offences committed by employees of Porsche and external parties in the performance of their duties as well as other violations

of rules and grievances within the company. This concerns, for example, the investigation and sanctioning of fraud, corruption, tax offences, antitrust violations, money laundering or other economic offences or violations of Porsche Code of Conduct.

- **履行法律义务：**我们负有全面的法律、监督和合规义务，且可能需要配合Dr. Ing. h.c. F. Porsche AG、Volkswagen AG及保时捷和大众汽车集团中的其他集团公司遵守其法律、监督和合规义务。调查措施通常是为了履行这些法律及其他义务。例如，我们采取调查措施以确保我们的产品符合法律和监管要求（产品合规），并识别公司内部可能的利益冲突。

Implementation of legal obligations: We are subject to comprehensive legal, supervisory and compliance obligations, and may need to cooperate with Dr. Ing. h.c. F. Porsche AG, Volkswagen AG and other group companies within the Porsche and Volkswagen group in their compliance with legal, supervisory and compliance obligations. Investigatory measures are typically intended to implement those legal and other obligations. For example, we carry out investigatory measures to ensure that our products comply with legal and regulatory requirements (product compliance) and to identify possible conflicts of interest within the company.

- **防止将来的不当行为：**此外，调查措施的结果（在为此目的适当的范围内）也有助于采取一般性的预防性合规措施（例如培训课程），由此有助于防止或减少保时捷员工将来违反合同义务或劳动规章制度的行为或犯罪行为。

Prevention of future misconduct: Furthermore, the results of the investigatory measures – to the extent suitable for this purpose – also contribute to general, preventive compliance measures (e.g. training courses) and thus help to prevent or minimize future violations of contractual obligations or employment policies or criminal offences by employees of Porsche.

- **行使权利：**调查措施还可帮助保时捷避免即将遭受的经济或其他损害或不利情况或获得赔偿，从而有效地保护、行使和执行权利。例如，在发生劳动法庭和仲裁程序或其他法律纠纷的情况下，我们会利用通过调查措施取得的结果和信息。

Exercise of rights: Investigatory measures can also serve to compensate for and ward off imminent economic or other damages or disadvantages for Porsche and thus to effectively defend, exercise and enforce rights. For example, we will use the results and information obtained through investigatory measures in the context of labor court and arbitration proceedings or other legal disputes.

- **排除员工责任：**我们还会在个人信息主体的协同下采取适当的调查措施，以解决可能针对被错误怀疑之人的指控，并排除其责任（即为其平反）。

Discharge of employees: We also take suitable investigatory measures – in coordination with the personal information subjects – in order to resolve possible accusations against persons wrongly suspected and to discharge them (so-called rehabilitation).

- **审核与其他集团公司的相关性：**举报人提供的、可能也涉及Dr. Ing. h.c. F. Porsche AG、Volkswagen AG或保时捷或大众汽车集团中的任何其他集团公司的信息可能会（直接或间接地）传输至Dr. Ing. h.c. F. Porsche AG、Volkswagen AG或保时捷或大众汽车集团中的任何其他集团公司。处理您的个人信息的目的之一是审核在个别情况下是否有必要传输个人信息及是否符合适用法律。

Review of relevance for other group companies: The information from whistleblowers that may also

concern Dr. Ing. h.c. F. Porsche AG, Volkswagen AG or any other group company within the Porsche or Volkswagen group may be forwarded (directly or indirectly) to Dr. Ing. h.c. F. Porsche AG, Volkswagen AG or any other group company within the Porsche or Volkswagen group. The processing of your personal information serves, *among other things*, to review whether a respective transfer of personal information is necessary and compliant with applicable laws in individual cases.

- **履行配合义务：**我们可能依法有义务配合将调查措施实施过程中收集的个人信息提交给执法机构或其他机关。例如，刑事检控机关因调查措施而针对个人信息主体展开刑事调查程序时，可能发生这种情况。

Implementation of duties of cooperation: We may be obligated by law to cooperate in submitting personal information collected in the course of the investigatory measures to law enforcement agencies or other authorities. This may be the case, for example, if a criminal prosecution authority initiates criminal investigation proceedings against a personal information subject as a result of investigatory measures.

此外，处理个人信息的可能目的参见关于劳动关系的一般隐私声明。

In addition, the possible purposes of processing of personal information are those stated in the general Privacy Notice for the employment relationship.

4. 调查措施会收集、处理或影响哪些信息或哪些类别的信息？

Which data or categories of data are collected, processed or otherwise affected by investigatory measures?

作为调查措施的一部分，我们可能会处理可能包含您的个人信息的下述信息或下述类别的信息：

As part of investigatory measures, we may process the following data or categories of data that, in each case, may contain personal information about you:

- **与举报相关的信息：**作为举报流程的一部分，我们会收集与举报人提供的信息相关的时间、内容及其他相关情况等信息。例如，我们会记录举报人是通过内部还是外部报告渠道进行的举报。如果举报人在举报内容中披露其身份，我们也会收集这一信息。

Data relating to tips: As part of the whistleblowing process, we collect, *among other things*, the time, content and other relevant circumstances relating to the information provided by whistleblowers. For example, we will record whether the whistleblower submitted the report through an internal or external reporting channel. If a whistleblower discloses his or her identity as part of the report, we will also collect this information.

- **运营信息：**在采取调查措施的情况下，我们还可能处理有关您的运营信息（例如在公司的职能、职衔、可能的优势地位、业务电邮地址、业务电话号码）。

Operational data: In the context of investigatory measures, we may also process operational information about you (e.g. function in the company, job title, possible superior position, business e-mail address, business telephone number).

- **相关事实的信息：**通常的调查措施经常涉及具体事实。确定和评估有关事实的相关信息可能可以对您的行为或您采取的行动得出结论。在个别情况下，这可能也包括违反职责或刑事犯罪。

Information on relevant facts: Typical investigatory measures often refer to concrete facts. The

determination and evaluation of relevant information on the respective facts may allow conclusions to be drawn about your behavior or actions taken by you. In individual cases, this may also include violations of duty or criminal offences.

- **业务相关文件：**在采取调查措施的情况下，我们还会审核业务相关文件。在个案情况下，可能包括差旅费报告、时间表或小时时间表、合同、绩效记录、日志或发票。

Business-related documents: We will also review business-related documents in the context of investigatory measures. In individual cases, these may include travel expense reports, time sheets or hourly time sheets, contracts, performance records, logbooks or invoices.

- **沟通行为：**此外，调查措施有助于我们对您在使用公司通讯系统时的沟通行为得出结论。例如，我们还可能为审查电子邮件的目的查看您的公司电子邮件收件箱中的电子邮件内容。此外，我们还可能会分析日志数据或元数据。

Communication behavior: In addition, investigatory measures can help us to draw conclusions about your communication behavior when using company communication systems. For example, we may also access the content of e-mails in your company's e-mail inbox for the purpose of e-mail review. In addition, we may also analyze log data or metadata.

- **一般个人信息：**作为调查措施的一部分，我们可能会处理您的一般个人信息（例如姓名、私人地址、私人电话号码、私人电邮地址）。

General personal information: As part of investigatory measures, we may process general personal information about you (e.g. name, private address, private telephone number, private e-mail address).

- **私人内容：**在个别情况下，审核的数据记录还可能有助于对影响您的私人内容得出结论。例如，在举报人的举报包含相应内容时，可能发生这种情况。但是，我们会采取适当的技术和组织措施，确保不会审查纯私人内容的数据记录。

Private contents: In individual cases, the data records to be reviewed may also allow conclusions to be drawn about private content that affects you. This may be the case, for example, if a report submitted by a whistleblower contains corresponding content. However, we will take appropriate technical and organizational measures to ensure that data records with purely private content are not evaluated.

- **刑事定罪和犯罪信息：**在采取调查措施的情况下，我们还可能需要收集您的个人信息，如果这些信息可能有利于对影响您的犯罪或刑事定罪得出结论。

Data on criminal convictions and offences: In the context of investigatory measures, we may also need to collect personal information about you which may allow conclusions to be drawn about crimes or criminal convictions affecting you.

- **敏感个人信息：**“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。在个别情况下，作为调查措施的一部分，您可能会向我们提供，且我们可能会收集敏感个人信息。在大多数情况下，我们不会要求您提供敏感个人信息，而是您主动自愿向我们提供，例如举报人的举报包含相应信息。在我们要求您提供敏感个人信息的一些少数情况下（例如我们在采取调查措施时要求您提供额外信息），我们会始终确保收集的敏感个人信息是达到第3条所载的目的所必需的，会以对个人的权利和利益影响最小的方式处理敏感个人信息，并会落实适当的

安全措施来保护信息安全。在任一情况下，您确认并同意，我们可以根据本隐私声明的规定，为本隐私声明所述的目的处理您的敏感个人信息。我们将仅根据适用法律的相关规定（特别是《个人信息保护法》第二章第二节）处理该等敏感个人信息。

Sensitive personal information: "Sensitive personal information" means personal information that, once divulged or illegally used, may easily cause harm to the dignity of natural persons or endanger personal or property safety, including biometric, religious belief, specific identity, medical and health care, financial account, location tracks and other information, as well as personal information of minors under the age of 14. In individual cases, you may provide to us and we may collect sensitive personal information as part of investigatory measures. In most cases, we may not request from you, but you voluntarily provide to us on your own initiative, sensitive personal information, for example, if a report submitted by a whistleblower contains respective data. On some rare occasions where we request sensitive personal information from you (for example, we ask you to furnish additional information in the context of the investigatory measures), we will always ensure that sensitive personal information to be collected is sufficiently necessary to achieve the purposes stated in Section 3, sensitive personal information will be processed in such way of having the least impact on the rights and interests of individuals, and proper security measures will be put in place to protect data security. In either event, **you acknowledge and agree that we may process your sensitive personal information for the purposes stated in this Privacy Notice and in accordance with the provisions hereof.** We will process such sensitive personal information only in accordance with the relevant provisions of applicable laws, in particular Chapter 2(2) of the PIPL.

5. 我们处理您的个人信息的法律依据

On what legal basis do we process your personal information?

仅在适用至少一项适用法律依据的情况下，我们将在调查措施的范围内处理您的个人信息。这是考虑到《个人信息保护法》及其他相关法规的规定。

We will only process your personal information within the scope of investigatory measures if at least one applicable legal basis applies. This includes in particular the provisions of the PIPL and other relevant statutory regulations.

我们将在调查措施的范围内进行允许的个人信息的处理，特别是基于下述法律依据：

We may base permissible processing of personal information within the scope of investigatory measures in particular on the following legal bases:

- **履行劳动关系、根据依法制定的劳动规章制度实施人力资源管理：**为与员工建立和终止劳动关系及/或根据依法制定的劳动规章制度实施人力资源管理等目的，可能需要在调查措施的范围内处理个人信息。例如，这适用于旨在发现违反劳动关系项下的职责或违反劳动规章制度项下的义务但不构成犯罪的行为的调查措施。调查措施对履行劳动关系可能也是必要的。例如，如果我们基于调查措施对个人信息主体实施劳动法项下的处罚，可能发生这种情况。

Performance of the employment relationship and HR management in accordance with the duly-formulated employment policies: The processing of personal information within the scope of investigatory measures may be necessary, *among other things*, for the initiation and termination of the employment relationship with employees and/or for the HR management in accordance with the

employment policies that are duly formulated pursuant to law. This applies, for example, to investigatory measures to uncover violations of duty under the employment relationship or violations of obligations under the employment policies which do not constitute a criminal offence. Investigatory measures may also be necessary for the performance of employment relationships. This may be the case, for example, if we impose labor law sanctions on personal information subjects on the basis of investigatory measures.

- **履行法定义务和法定职责：**本隐私声明第2和3条中已有说明，我们以及保时捷和大众汽车集团中的其他集团公司负有全面的法律、监督和合规义务。因此，我们实施的调查措施亦旨在确保遵守这些法定义务。此外，我们也可为了提起、抗辩或行使法律权利主张而处理个人信息。

Performance of legal obligations and statutory duties: As already described in Sections 2 and 3 of this Privacy Notice, we, together with other group companies within the Porsche and Volkswagen group, are subject to comprehensive legal, supervisory and compliance obligations. The investigatory measures carried out by us thus also serve, *among other things*, to ensure compliance with these legal obligations. Further, processing of personal information may also be justified for us to assert, defense or exercise legal claims.

- **在合理的范围内处理已公开的信息：**我们可能会处理您或他人或通过其他合法渠道已经公开的个人信息，前提是我们会根据《个人信息保护法》在合理的范围内处理该等个人信息。

Reasonable processing of publicly-available information: We may process personal information that has already been made publicly-available by you or others or through other legitimate channels, *provided that* our processing of such personal information will be conducted pursuant to the PIPL and to a reasonable extent.

- **同意：**在适用法律要求的范围内，我们可基于您的同意处理个人信息。

Consent: To the extent required by applicable laws, we may process personal information based on your consent.

6. 我们会向谁传输您的个人信息？

To whom will we transfer your personal information?

我们将仅在适用法律允许的范围内，在遵守适用法律的前提下，作为调查措施的一部分而向第三方传输您的个人信息。

We will only transfer your personal information to third parties as part of investigatory measures to the extent permissible by and subject to compliance with applicable laws.

我们可能会在调查措施的过程中，为第3条所述的目的传输您的个人信息（信息类别见第4条所列），特别是传输至下述接收方：

We may transfer your personal information (the categories of which are listed in Section 4) in the course of investigatory measures particularly to the following recipients, in each case, for the purposes stated in Section 3:

- **其他集团公司：**为了调查可能的合规问题，我们可能还需要为第3条所述的目的，将您的个人信息（信息类别见第4条所列）传输至Dr. Ing. h.c. F. Porsche AG或保时捷集团中的集团公司（这些公司在确有必要的情况下可能会进一步将信息传输至Volkswagen AG或大众汽车集团中

的集团公司)。特别是,如果调查影响到若干或其他集团公司,则可能会发生该等传输。这些集团公司可能位于中国境内或境外。

Other group companies: In order to investigate possible compliance issues, we may also have to transfer your personal information (the categories of which are listed in Section 4) to Dr. Ing. h.c. F. Porsche AG or any group companies within the Porsche group (which may further transfer the same to Volkswagen AG or any group companies within the Volkswagen group, where truly necessary) for the purposes stated in Section 3. Such transfers may occur, in particular, if the investigation affects several or other group companies. These group companies may be located within or outside of China.

Dr. Ing. h.c. F. Porsche AG的联系方式如下:

The contact details of Dr. Ing. h.c. F. Porsche AG are as follows:

Dr. Ing. h.c. F. Porsche AG

Porscheplatz 1

70435 Stuttgart Germany

datenschutz.personal@porsche.de

您确认并同意,我们可以根据本隐私声明的规定,在调查措施的过程中为本隐私声明所述的目的直接或间接地将您的个人信息传输至Dr. Ing. h.c. F. Porsche AG、Volkswagen AG及保时捷或大众汽车集团中的其他集团公司,该等公司可能位于中国境内或境外。

You acknowledge and agree that we may transfer your personal information in the course of investigatory measures, directly or indirectly, to Dr. Ing. h.c. F. Porsche AG, Volkswagen AG and other group companies within the Porsche or Volkswagen group, which may be located within or outside of China, for the purposes stated in this Privacy Notice and in accordance with the provisions hereof.

- **法院、仲裁庭、机关及其他公共机构:** 我们还可能根据适用法律,向拥有管辖权的公共机关披露调查措施的结果。特别是,如果我们有法律义务披露相应信息,则需要进行该等披露。例如,在因调查措施而展开刑事调查时,可能发生这种情况。

Courts, arbitration tribunals, authorities and other public bodies: We may also disclose the results of investigatory measures to public authorities who have competent jurisdiction in accordance with applicable laws. Such disclosure may be necessary in particular if we are legally obliged to disclose the corresponding information. This may be the case, for example, in the context of criminal investigations initiated as a result of investigatory measures.

- **服务提供者(如有):** 在实施调查措施时,我们还可能由外部服务提供者提供支持,比如律师事务所或审计公司。我们会采取适当的措施确保这些服务提供者仅按适用法律处理您的个人信息。

Service providers (if any): When carrying out investigatory measures, we may also use the support of external service providers, such as law firms or auditing companies. We will take appropriate measures to ensure that these service providers process your personal information only in compliance with applicable laws.

- **代表我们处理个人信息并受我们的指示约束的受托人(如有):** 在采取调查措施的情况下,我们还可能委托第三方处理您的个人信息,例如为了进行文件管理。我们会确保这些受托人

仅根据有效的信息处理协议代我们处理个人信息。

Entrusted persons (if any) who process personal information on our behalf and are bound by our instructions: We may also entrust third parties to process your personal information, e.g. for document management purposes, in the context of investigatory measures. We will ensure that these entrusted persons process personal information for us only on the basis of an effective and valid data processing agreement.

- **其他第三方（如有）：** 在为实现本隐私声明所载的目的而必要的前提下，您的个人信息亦可能会传输至相对方或保险公司。

Other third parties (if any): *Provided that this is necessary to carry out the purposes stated in this Privacy Notice, it is also possible that your personal information may be passed on to opposing parties or insurance companies.*

在任何情况下，我们将仅遵循合法、正当、必要和诚信原则，为特定、明确的目的传输您的个人信息，并仅在实现第3条所述目的所需的范围内传输个人信息。**您确认并同意，我们可以根据本隐私声明的规定，为本隐私声明所述的目的向上述第三方或上述各类第三方传输您的个人信息。**在适用法律要求的范围内，我们会向您明确告知某些第三方的名称/姓名和联系方式。

In any case, we will only transfer your personal information for specific and definite purposes based on the principles of lawfulness, fairness, necessity and good faith, and only transfer personal information to the extent necessary to achieve the purposes described in Section 3. **You acknowledge and agree that we may transfer your personal information to the aforementioned third parties or categories of third parties for the purposes stated in this Privacy Notice and in accordance with the provisions hereof.** To the extent required by applicable laws, we will expressly inform you of the name and contact details of certain third parties.

关于劳动关系的一般隐私声明载明了可能接收您个人信息的接收方的详细名单。

The general Privacy Notice for the employment relationship contains a more detailed list of possible recipients of your personal information.

如果我们没有直接向您收集为合规目的处理的您的个人信息，我们通常会从隐私声明的本条中上述的当事人、业务合作伙伴或类似来源获得该等信息。

If we have not collected your personal information processed for compliance purposes directly from you, we will typically receive it from the parties, business partners or similar sources mentioned above in this Section of the Privacy Notice.

7. 您享有的关于个人信息的权利

What rights pertaining to personal information do you have?

作为个人信息主体，您可以行使关于您个人信息的各项权利。如欲行使您的权利，您可以通过第1条所列的联系方式联系我们。

As a personal information subject, you can exercise various rights pertaining to your personal information. In order to exercise your rights, you can contact us using the contact details listed in Section 1.

如果您的个人信息跨境传输至Dr. Ing. h.c. F. Porsche AG，您亦有权对Dr. Ing. h.c. F. Porsche AG提出行

使权利的请求，并可以通过第6条所列的联系方式联系他们。我们鼓励您先与我们联系，我们会与Dr. Ing. h.c. F. Porsche AG联络处理您的请求。

Where your personal information is transferred overseas to Dr. Ing. h.c. F. Porsche AG, you also have the right to request Dr. Ing. h.c. F. Porsche AG in order to exercise your rights, and may contact them using the contact details listed in Section 6. You are encouraged to contact us first, and we can liaise with Dr. Ing. h.c. F. Porsche AG in handling your request.

这些权利尤其包括：

These rights include in particular:

- 查阅和复制您的个人信息的权利，法律规定对处理保密或者不需要告知的除外；
Right to access and make a copy of your personal information, unless the processing is required by law to be kept confidential or notification is otherwise not required;
- 请求将您的个人信息转移至您指定的其他个人信息处理者的权利（在适用并相关的范围内）；
Right to request for transferring your personal information to another personal information processor designated by you (to the extent applicable and relevant);
- 请求更正不准确或者不完整的个人信息的权利；
Right to request for rectification of your personal information that is inaccurate or incomplete;
- 在适用法律规定的某些情况下请求删除或匿名化处理您的个人信息的权利；
Right to request for deletion or anonymization of your personal information on certain occasions stipulated in applicable laws;
- 在基于您的同意处理的情况下，限制处理或撤回同意并在将来生效的权利；
Right to restrict processing or withdraw consent with future effect, to the extent that the processing is based on your consent;
- 要求对您的个人信息处理规则进行解释说明的权利；及
Right to request for explanation regarding the rules governing the processing of your personal information; and
- 向履行个人信息保护职责的主管部门进行投诉或举报的权利。
Right to make a complaint or report with a competent authority taking charge of personal information protection.

我们会审核您的请求，如果该等请求合法并符合适用法律规定的相关要求，我们会满足您的请求。

We will review your request, and if such request is legitimate and meets relevant requirements stipulated under applicable laws, we will accommodate your request.

关于劳动关系的一般隐私声明中更详细地说明了个人信息主体的行使权利的前提条件和范围。

The general Privacy Notice for the employment relationship explains the prerequisites and the scope of the individual rights of personal information subjects in more detail.

8. 我们保存您的信息的期限

How long do we store your data?

我们会根据适用法律（特别是《个人信息保护法》第十九条）的规定保存或删除在调查措施的过程中收集的个人信息。这意味着如果为本隐私声明所载的目的不再必要，我们会删除您的个人信息，适用法律另有规定的除外。

We will store or delete personal information collected in the course of investigatory measures in accordance with applicable laws, in particular Art. 19 of the PIPL. This means that we will delete your personal information if it is no longer required for the purposes stated in this Privacy Notice, unless otherwise stipulated under applicable laws.

但是，我们可能有理由为调查目的以外的其他目的保存您的个人信息更长时间。例如，我们可能会在可能的调查引起的当前诉讼期间保留您的个人信息。保留期根据适用法律和我们的保存惯例按具体情况确定，同时考虑保留对保时捷的重要性以及举报系统中举报的怀疑事项被证明属实的可能性。

However, we may justify longer storage of your personal information for other purposes other than investigatory purposes. For example, we may continue to retain your personal information during current litigation, which is the result of possible investigations. The retention periods are determined on a case-by-case basis according to applicable laws and our storage practices, taking into account the importance of retention for Porsche and the probability that a suspicion reported in the Whistleblower System proves to be true.

关于劳动关系的一般隐私声明载明了关于保存员工个人信息的相关要求的进一步信息。

The general Privacy Notice for the employment relationship contains further information on the relevant requirements for the storage of personal information of employees.

9. 是否实施自动化决策或个人画像？

To what extent are automated decision-making or individual profiling measures taken?

在实施调查措施时，我们没有使用《个人信息保护法》第二十四条所述的自动化决策或个人画像措施。

Neither automated decision-making nor individual profiling measures within the meaning of Art. 24 of the PIPL take place in the context of investigatory measures.

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