

Privacy Statement for Greater China 大中华区隐私声明



1. Introduction 前言

- + Goodman Asia Limited, Goodman Management Consulting (Shanghai) Co. Ltd., Goodman Management Consulting (Beijing) Co. Ltd. and their controlled, associated or related entities, including any funds managed by them (each, being “Goodman”, Goodman Group”, “we”, “us”, “our”) recognize the importance of protecting the privacy and rights of individuals in relation to their personal data.
嘉民亚洲有限公司、嘉民管理咨询（上海）有限公司、嘉民管理咨询（北京）有限公司及其控制、关联或相关的实体，包括由上述任何一家管理的所有基金（以下称为“嘉民”、“嘉民集团”、“我们”、“我们的”）知悉就个人资料之隐私保护及个人权利的重要性。
- + This document is our privacy policy and it tells you how we collect and manage the personal data of the parties with whom we deal, including but not limited to our customers, contractors, agents and other third parties. We respect rights to privacy, including as required under all relevant laws and regulations such as Personal Data (Privacy) Ordinance of Hong Kong (“PDPO”) and the relevant regulations and policies of the People’s Republic of China (“PRC”) regarding protection of personal information and under all applicable privacy and similar legislation in the jurisdictions in which we operate.
本文件属我们的隐私政策，它告知您我们是如何收集并管理与我们交易各方（包括但不限于我们的客户、承包商、代理人及其他第三方）的个人资料。我们重视隐私权，当中包括就保护个人资料的所有相关法律法规的规定（如《香港个人资料（隐私）条例》（“PDPO”））、中华人民共和国（“中国”）的相关法规及政策及我们经营所在的司法管辖区所有适用的隐私和类似法规尊重隐私权。

2. What is your personal data? 什么是您的个人资料？

- + In general terms, personal data is any data that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the data we collect personally identifies you, or you are reasonably identifiable from it, that data will be considered personal data.

一般来说，可被用于对您进行个人识别的任何资料即属个人资料，包括您的姓名、地址、电话号码、电子邮件地址及专业或职业。若我们收集的资料能对您个人进行识别，或您可合理被识别，该等资料将被视为个人资料。

- + The term may be given a specific definition under privacy legislation which may apply in jurisdictions in which we operate. If this is the case, Goodman will treat in that jurisdiction that information or data as personal information or data for the purpose of the privacy legislation applying in that jurisdiction. 根据我们经营所在的司法管辖区内适用的隐私法规，这个术语可能会给出一个具体定义。若情况如此，则就该等司法管辖区所适用的隐私法规而言，嘉民将在该等司法管辖区视该等信息或资料为个人信息或资料。

3. What personal data do we collect and hold?

我们收集并持有哪些个人资料？

- + We may collect personal data from you in the course of our business, through your use of our website, when you contact or request information from us, or as a result of your relationship with Goodman. We may collect the following types of personal data:
我们可能在业务过程中、通过您使用我们的网站、当您与我们联系或要求我们提供信息、或基于您与嘉民的关系，收集下列各类个人资料：
 - general identification and contact information, such as your name, the company you work for, your title, position, your postal address, email address and phone numbers;
一般身份证明和联系资料，例如您的姓名、就职公司、您的头衔、职位、邮政地址、电子邮件地址和电话号码；
 - identification and background information, which may include your full name, photographic identification such as a passport or identification card and gender;
身份证明和背景资料，其中可能包括您的全名、照片身份证明（例如护照或身份证）和性别；
 - financial information, such as bank account;
财务信息，例如银行帐户；
 - information you provide to us for the purposes of attending meetings and Goodman events, for example your contact details and business information disclosed to Goodman through the exchange of business cards;
因参加会议和嘉民活动而向我们提供的资料，例如通过交换名片向嘉民披露的您的联系方式和商业资料；
 - personal information provided to us by or on behalf of our customers, suppliers, investors and other stakeholders or generated in the course of our relationship with them;
由客户、供应商、投资者和其他利益相关方或其代表提供给我们的个人资料，或因我们与其关系往来所产生的个人资料；
 - personnel records of employees and applicants for any type of role or employment with Goodman;
任何类型职位上的雇员和申请人的个人记录，及嘉民的雇佣记录；
 - details of services you have enquired about, together with any additional information necessary to deliver those services and to respond to your enquiries;
您垂询的服务详情，以及提供该等服务和任何答复您询问所需的其他资料；
 - any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise; and
您通过我们的网站直接提供、或通过利用我们的网站或在线状态间接提供、或通过我们的代表或其他方式向我们提供的任何有关您的其他资料；及

- information you provide to us through our representatives or customer surveys from time to time.
您通过我们的代表或客户调查不时向我们提供的资料。

4. How do we collect your personal data?

我们是如何收集您的个人资料的？

- + We will collect your personal data directly from you unless it is unreasonable or impracticable to do so. When collecting personal data from you, we may also collect it in ways including:
我们将直接向您收集您的个人资料，除非这是不合理或不可行的。在向您收集个人资料的同时，我们亦可能通过下列方式进行收集，其中包括：
 - through your access and use of our website;
通过您访问及使用我们的网站；
 - through an intermediate entity that represents you;
通过代表您的中介实体；
 - during conversations between you and our representatives; or
在您与我们的代表进行对话期间；或
 - when you make an enquiry, complete an application or enter into some form of contractual or other arrangement with us.
在您垂询、填写申请或与我们订立某种形式的合同或其他安排时。
- + We may also collect personal data from third parties including from third party companies such as credit reporting or due diligence agencies and other government entities, but may only use this data in a manner consistent with the purposes described below.
我们还可能向第三方收集个人资料，其中包括诸如信用报告机构等第三方公司或尽职审查代理机构和其他政府实体，但仅可为下述目的使用该等资料。

5. Cookies

- + When you access our website, we may send a “cookie” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website with any relevant preferences. We may also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our website.
在您访问我们的网站时，我们会向您的电脑发送“cookie”（包含独一无二身份号码的小型概要文档）。这能使我们在您访问我们网站时识别您的电脑，并在您每次访问我们网站时根据您的相关访问偏好向您打招呼。我们亦可利用 cookies 来衡量流量模式、来确定我们网站的哪些区域被访问并衡量总体交易模式。我们利用 cookies 来研究用户的习惯，以便我们改善我们的网站。
- + Our cookies do not collect personal data and we have no intention to use the visitor data to personally identify anyone. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them, but if you do, certain functionality may not be available.
我们的 cookies 并不收集个人资料，而且我们无意使用访问者数据以识别任何人。若您不希望接受 Cookies，您可对浏览器进行设置，这样您的计算机就不会接受该等 Cookies。但是如果您进行了相关设置，某些功能可能无法使用。
- + We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyses trends, administer the website, track users movements and gather broad demographic information.

我们可能记录 IP 地址（即与因特网连接的计算机的电子地址）来分析趋势、管理网站、追踪用户活动情况及收集广泛的用户统计资料。

6. What happens if we cannot collect your personal data?

若我们无法收集您的个人资料，会发生什么情况？

- + If you do not provide us with the personal data described above, some or all of the following may happen:
若您不向我们提供上述个人资料，则可能发生下列若干或全部情况：
 - we may not be able to provide the requested services to you, either to the same standard or at all;
我们可能无法按相同的标准向您提供所要求的服务，或根本无法提供该等服务；
 - we may not be able to provide you with information or data about our products and services that you may want; or
我们可能无法向您提供您所需要的产品或服务的信息或资料；或
 - we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.
我们可能无法根据您的偏好调整网站内容，并且可能无法使您的网站体验满意或满足您的要求。

7. For what purposes do we collect, hold, use and disclose your personal data?

我们收集、持有、使用及披露您的个人资料的目的是什么？

- + We may collect and hold personal data about you so that we can perform our business activities and functions and provide the best possible quality customer service.
我们收集并持有您的个人资料，目的是为了开展业务活动、履行职责、并尽可能提供最高质量的客户服务。
- + Subject to any restrictions under the applicable legislation in the jurisdiction in which the information or data was collected, we may use and disclose your personal data for the following purposes:
在遵守收集信息或资料所在的司法管辖区的适用法律项下的限制规定的前提下，我们可能为下列目的使用并披露您的个人资料：
 - to inform you of updates concerning relevant members of the Goodman Group;
将有关嘉民集团相关成员的更新情况通知您；
 - to provide services to you and to send communication or information requested by you;
向您提供服务，并发送您所要求的通讯或资料；
 - to provide you with access to certain areas of our website;
向您提供我们网站中某些区域的访问权利；
 - to conduct business processing functions including providing personal data to our controlled, associated or related entities, contractors, service providers or other third parties;
开展业务处理，包括向受我们控制、关联或相关的实体、承包商、服务供应商或其他第三方提供个人资料；
 - for the administrative, marketing (including direct marketing), planning, product or service development, quality control or research purposes of the Goodman Group;
出于嘉民集团的管理、营销（包括直销）、规划、产品或服务开发、质量控制或研究目的；
 - to provide your updated personal data to our related bodies corporate, contractors or service providers for the purposes of our business or our relationship with you;

因业务获我们与您的关系所需，向我们的关联法人团体、承包商或服务供应商提供您更新后的个人资料；

- to update our records and keep your contact details up to date; to process and respond to any complaint made by you; and
更新我们的记录，并确保您的联系资料是最新的；处理及回应您所提出的任何投诉；及
 - to comply with any law, rule, regulation (including applicable know your customer, anti-money laundering and counter-terrorism financing regulations and requirements), lawful and binding determination, decision or direction of a regulator or other authority.
遵守监管机关的任何法律、规则、规例（包括适用之了解您的客户，反洗钱及反恐资金筹集法规和要
求）和具有法律约束力的裁定、决定或指示，或与任何国家的任何政府机关（或某一国家的政治分
部）进行合作。
- + Your personal data will not be shared, rented or disclosed other than as described in this Privacy Policy.
除本隐私政策规定所述外，您的个人资料不会被分享、出租或披露。

8. How long do we keep your personal data?

我们会将您的个人资料保留多长时间？

- + Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected, subject to satisfying any legal, accounting or other regulatory requirements.
当我们收集或处理您的个人资料时，我们只会在满足任何法律，会计或其他法规要求的前提下，将其保留达到收集目的所必需的时间。
- + At the end of any retention period, your data will either be deleted completely or anonymised (for example, by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis or business planning).
在任何保留期结束时，您的资料将被完全删除或匿名化（例如，通过与其他资料进行汇总，以便以不可识别的方式用于统计分析或业务计划）。
- + In some circumstances, you can ask us to delete your data.
在某些情况下，您可以要求我们删除您的资料。

9. To whom may we disclose your personal data?

我们向谁披露您的个人资料？

- + Subject to any restrictions under the applicable legislation in the jurisdiction in which the information or data was collected, we may disclose personal information or data to:
在遵守收集信息或资料所在的司法管辖区的适用法规项下的任何限制规定的前提下，我们可能向下列人士披露个人信息或资料：
 - our employees, controlled, associated or related entities, contractors or service providers for the purposes of the operation of our website or our business, fulfilling requests by you and to otherwise provide services to you including, without limitation, share registry providers, custodians, web hosting providers, IT systems administrators, accounting and fund administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors, real estate agents and consultants;
为了运营我们的网站或业务，满足您提出的要求，并向您提供服务的我们的雇员、受控制的、关联相关或实体、承包商或服务供应商，其中包括但不限于：股份登记供应商、托管人、网站托管供应商、IT系统管理员、会计及基金经理人、邮局、快递公司、付款处理人、数据输入服务供应商、电子网络管理人、收债人及诸如会计、律师、业务顾问、房地产代理人 and 顾问等专业顾问；

- suppliers and other third parties with whom we have commercial relationships for business, marketing and related purposes; and
为了业务、营销和其他相关目的而与我们有商业关系的供应商和其他第三方；及
 - any governmental organisation for any authorised purpose or as required under or in connection with any law.
任何用于授权，或根据任何法律要求或与任何法律有关的政府性组织。
- + We may combine or share any personal data that we collect from you with personal data collected by any of our controlled, associated or related entities, subject to any applicable restrictions on the disclosure of information in any jurisdiction to entities outside that jurisdiction. Personal data may also be disclosed to any person or persons pursuant to any statutory obligations or as required by law.
我们可能将向您收集的任何个人资料与任何受我们控制、关联或相关的实体收集的个人资料合并或与其分享，但须遵守任何司法管辖区内有关向该司法管辖区外实体披露信息的任何适用限制规定。我们还可能根据任何法定义务或按法律规定向任何人士披露个人资料。

10. Direct marketing materials 直销资料

- + Subject to any restrictions under any legislation in the jurisdiction in which the information was collected, we may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, WeChat and other messaging services and email, in accordance with applicable laws and regulations.
在遵守收集信息所在的司法管辖区的任何法规项下的任何限制规定的前提下，我们可能向您发送我们认为您感兴趣的有关我们服务的直销通讯资料和信息。该等通讯资料可能根据适用法律法规以各种形式发送，包括邮件、SMS、WeChat 及其他即时通讯服务和电子邮件。
- + If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing materials from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.
若您希望优先采用某一种通讯方式，我们在可行情形下将努力这样做。另外，经与我们联系（见下文详细信息）或使用营销通讯资料中所提供的退出功能，您可随时选择不接收我们的营销资料，我们届时将确保将您的姓名从邮件名单中删除。
- + We do not provide your personal data to other organizations for the purposes of direct marketing by them.
我们不会向其他组织提供您的个人资料供其直销使用。

11. How can you access and correct your personal data? 您如何查阅和修改您的个人资料？

- + You are entitled to access or correct any personal data we hold about you at any time by contacting us (see the details below). Where we hold data that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by mailing or emailing it to you) within the time limits prescribed under applicable laws and regulations.
经与我们联系（见下文详细信息），您有权随时查阅或修改我们持有的有关您的任何个人资料。若我们持有您有权查阅的资料，我们将在适用法律法规规定的时限内向您提供适当查阅方式（例如，以邮寄或电子邮件方式向您发送）。
- + There may be instances where we cannot grant you access to the personal data we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or it would result in a breach of confidentiality. If that happens, we will give you written reasons for the refusal.

有些情形下，我们无法同意您查阅我们持有的个人资料。例如，若任何授权查阅会影响其他人的隐私或会导致违反保密规定，我们或须拒绝该等查阅。若发生该等情况，我们将向您提供书面拒绝理由。

12. What is the process for complaining about a breach of privacy?

有关违反隐私规定的投诉程序是怎样的？

- + Goodman prefers that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Goodman's Privacy Officers will normally deal with privacy complaints. Otherwise, the complaint will be dealt with by someone who was not involved in the conduct that your complaint is about. Goodman will attempt to confirm as appropriate and necessary with your understanding of the conduct relevant to the complaint and what you expect as an outcome. Goodman will, within the time limits prescribed under applicable laws and regulations, inform you whether Goodman will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

嘉民希望，有关违反隐私规定的投诉以书面提出，从而我们能确认投诉详情。通常由嘉民的隐私官处理隐私投诉。否则，投诉将由与您投诉所涉及行为无关的人士处理。按情况适当和必要，嘉民将与您确认您对投诉相关行为是否理解，并确认您期望获得的结果。嘉民将在适用法律法规规定的时限内通知您嘉民是否将进行调查、调查官的姓名、职务和联系详情及预计调查程序完成日期。

- + After Goodman has completed its enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, Goodman will assess it and advise if Goodman has changed its view. If you are unsatisfied with the outcome, Goodman will advise further options including, if appropriate, review by the relevant Government departments and agencies.

嘉民完成调查后，我们将与您联系（一般以书面形式）告知结果，并请您对我们的投诉处理结果进行答复。若我们收到您的答复后，会将对进行评估，并通知您嘉民是否已改变观点。若您对结果不满意，嘉民将为您提供进一步的选择，其中包括由相关政府部门和机关进行审查（若适当）。

13. Do we disclose your personal data overseas?

我们是否会将您的个人资料披露到海外？

- + Subject to any restrictions under any legislation in the jurisdiction in which the information was collected, we may disclose personal data to our controlled, associated or related entities and third party suppliers and service providers located overseas for some of the purposes listed above. We will take reasonable steps to ensure that the personal data sourced or transferred outside Hong Kong or China (as applicable) is protected to standards in line with the requirements.

在遵守信息收集所在的司法管辖区的适用法规项下的任何限制规定的前提下，我们可能就上文所述的若干目的，向位于海外的受我们控制、关联或相关的实体和第三方供应商和服务供应商披露个人资料。我们将采取合理措施，以确保在香港或中国（视情况而定）获得或向香港或中国（视情况而定）境外转发的个人资料按照符合要求的标准得到保护。

- + We take reasonable steps to ensure that the overseas recipients of your personal information or data do not breach the privacy obligations relating to your personal information or data.

我们将采取合理措施，以确保您的个人信息或资料的海外接收方不违反有关您的个人信息或资料的隐私义务。

14. Security

安全

- + We take reasonable steps to ensure your personal data is protected from misuse and loss from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal data is destroyed or de-identified when no longer needed.

我们将采取合理措施以确保您的个人资料得到保护，不被滥用、不因未经授权的查阅、修改或披露而受到损失。我们可能以电子版或纸质版形式持有您的信息。不需要时，个人资料将被销毁或去识别化。

- + We limit access to your personal data to those employees, agents, contractors and other third parties on a “need to know” basis.
我们基于“需要知晓”的原则，仅允许需要了解您个人资料的那些雇员、代理、承包商和其他第三方查阅您的个人资料。
- + We cannot provide any assurance regarding the security of transmission of data you communicate to us online. We also cannot guarantee that the data you supply will not be intercepted while be transmitted over the internet. Accordingly, any personal data or other information which you transmit to us online is transmitted at your own risk.
关于您在线向我们发送的资料，我们对该等资料传送的安全无法作出保证。我们亦无法保证您所提供的资料在网络传送时不会被拦截。因此，您在线向我们传送的任何个人资料或其他信息的风险均由您自行承担。

15. Links

链接

- + Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy policies of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.
我们的网站可能包含由第三方运作的其他网站链接。我们对任何第三方网站的隐私政策不作任何陈述或保证，并且我们对任何第三方网站的隐私政策或内容概不承担任何责任。第三方网站应负责将其自己保护隐私权的做法告知您。

16. Contacting us

联系我们

- + We hope this privacy policy has been helpful in setting out the way we handle your personal data and your rights to control it.
我们希望本隐私政策对阐明我们处理您的个人资料的方式以及您对其的控制权有所帮助。
- + If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.
若您对本隐私政策有任何疑问，对您隐私的处理有任何顾虑或投诉，或您的隐私有潜在的侵犯可能，请使用我们网站上的联系链接或用下列联系方式与我们的隐私官联系：

Goodman Privacy Officer in Hong Kong:

Suite 901, Three Pacific Place,

1 Queen's Road East, Hong Kong, or call on +852 2249 3100.

Email: privacy.hk@goodman.com

嘉民隐私官 – 香港：

香港皇后大道东 1 号太古广场三座 901 室，或致电：+852 2249 3100

电子邮件： privacy.hk@goodman.com

Goodman Privacy Officer in China:

Unit 1001-1004,

10/F, Tower 2,

1539 Nanjing Road West,

Jing An District, Shanghai, China, or call on +86 21 6133 2000.

Email: privacy.cn@goodman.com

嘉民隐私官 – 中国:

中国上海静安区南京西路 1539 号二座 10 楼 1001-1004 室, 或致电: +86 21 6133 2000

电子邮件: privacy.cn@goodman.com

17. Changes to our privacy policy

我们隐私政策的变更

- + We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.
我们可能不时变更本隐私政策。本隐私政策的更新版本将在我们的网站上公布。
- + This privacy policy is written in English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this policy, the English version shall prevail.
本隐私政策以英文书写, 可译成其他语言。若本政策的英文版本与译本间有任何不一致, 应以英文版本为准。
- + This privacy policy was last updated on 5 December 2019.
本隐私政策最后更新日期为 2019 年 12 月 5 日。

It is important that the personal data that we hold about you is accurate and current. Please keep us informed if any of the personal data you have provided us with changes during your relationship with us.

您个人资料的准确性和时效性是十分重要的。如果在与我们合作关系期间您为我们提供的任何个人资料有变化, 请及时通知我们。