

TecAlliance Job Applicant Privacy Policy

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Effective Date: January 1, 2025

Introduction

Thank you very much for your interest in us.

This Privacy Policy is intended for individuals (the “**Applicants**”) who provide personal information to TecAlliance China Ltd. (hereinafter referred to as “**TecAlliance**” or “**we**”) in pursuit of employment opportunities.

TecAlliance places great importance on protecting the personal information of applicants (hereinafter referred to as “**you**”). We strictly comply with relevant laws and regulations and are committed to safeguarding your personal information.

Through this Privacy Policy, we aim to explain how we handle your personal information (including but not limited to collection, use, storage, provision, and deletion). Additionally, this Privacy Policy informs you of the rights you hold as the subject of personal information.

This Privacy Policy applies to the following situations:

- When applicants submit their resumes through electronic channels or online application platforms;
- When applicants submit their resumes through third-party sources (such as third-party recruitment websites);
- When applicants submit their resumes through offline channels; and
- In certain cases, our employees may recommend potential applicants. Such employees may provide personal data about potential applicants. In this case, potential applicants are considered applicants under this Privacy Policy and will be informed of the processing accordingly.

This Privacy Policy does not apply to services provided to you by third-party sources (such as third-party recruitment websites). We recommend that you read the privacy policies published by such third parties.

Before applying for a position or submitting personal information to us, please carefully read this Privacy Policy. By clicking to agree to this Privacy Policy or actively submitting your resume, you acknowledge and agree that we will collect your personal information and process it within the scope permitted by law and outlined in this Privacy Policy. If you have any questions, you can contact us through the methods indicated in this Privacy Policy.

This Privacy Policy will help you understand the following:

I. Definitions

II. How We Collect and Process Your Personal Information

III. How We Entrust, Share, Transfer, and Publicly Disclose Your Personal Information

IV. How We Store and Transfer Your Personal Information Across Borders

V. Your Rights as a Personal Information Subject

VI. How We Protect Your Personal Information

VII. Updates to this Privacy Policy

VIII. How to Contact Us

I. Definitions

This Privacy Policy by TecAlliance is based on the terminology used in relevant laws and regulations, including the current *Cybersecurity Law*, *Data Security Law*, and *Personal Information Protection Law*. Our Privacy Policy is designed to be easy for applicants to read and understand. To ensure this, we provide explanations of the terms used in advance.

The following terms are used in this Privacy Policy:

(1) [Personal Information]

Personal Information refers to various types of information recorded electronically or by other means that can identify a natural person's identity, either independently or in combination with other information. This includes but is not limited to a natural person's name, date of birth, identification number, personal biometric information, address, phone number, etc. It does not include information that has been anonymized.

(2) [Sensitive Personal Information]

Sensitive Personal Information refers to Personal Information that, if leaked or misused, could easily lead to the infringement of a natural person's dignity or endanger their personal or property safety. This includes biometric data, religious beliefs, specific identities, medical and health information, financial accounts, location tracking, and the Personal Information of minors under the age of fourteen.

(3) [Processing]

Processing refers to any operation or set of operations performed on Personal Information, whether by automated means or manually. This includes, but is not limited to, the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

II. How We Collect and Process Your Personal Information

For content involving Sensitive Personal Information, we have highlighted it in bold for emphasis.

1. Collection of Personal Information

To fulfill the purpose of job recruitment and comply with relevant laws and regulations, TecAlliance needs to process the Personal Information you submit when applying for a position at our Company. TecAlliance will collect the following Personal Information from you, depending on the details provided in your application materials.

Category	Details	Recipient
Basic Personal Information	– Your name, date of birth, gender, nationality, place of birth, place of residence, address, personal phone number, email address	TecAlliance China Ltd.
Personal Identification Information	– Your identification document information	TecAlliance China Ltd.
Educational and Employment Information	– Your educational background, including school, period of attendance, major, academic qualifications, degrees, and social activity experience – Your employment history, professional field, language skills, and relevant professional or other related certificates, including previous employer/internship details, job titles, start and end dates, job responsibilities, salary information , and whether there are any labor disputes with previous employers – Your job preferences	TecAlliance China Ltd.
Other Information	– Any additional information you voluntarily choose to provide in resume-related documents, such as your ethnicity, ID photo, religious beliefs, health information, marital and family status – Information submitted after receiving a job offer to complete onboarding procedures, including bank account information and household registration type (agricultural/non-agricultural)	TecAlliance China Ltd.

To ensure an accurate evaluation of your application and the fit for the position you are applying for, please ensure that the Personal Information you provide is truthful, complete, and not misleading. Submitting false, inaccurate, incomplete, or misleading information may result in the failure of your job application or consequences such as immediate termination. If the information you submit involves third-party personal information (e.g., emergency contacts, background check contacts, referees), please ensure that you have obtained the necessary authorization and consent, and do not infringe on the privacy, trade secrets, or other legal rights of third parties.

2. Sources of Personal Information

In most cases, we collect your Personal Information directly from you, such as when you submit your resume or cover letter to us in person, via email, or through other online or paper-based methods.

We may also obtain your Personal Information from third-party sources that you have authorized or directed, including other referees or authorized parties (e.g., recruitment websites).

For legitimate background checks related to your job application and with your authorization, TecAlliance may also obtain your Personal Information and other details from other legitimate channels, such as third-party service providers and their partners.

Additionally, if you use our website, we may collect information from your computer or other devices using technologies such as cookies. For more information about cookies and other data collection methods, please refer to the privacy policy of the website you visit.

3. Processing of Personal Information

We will process the Personal Information you submit when applying for a position at TecAlliance in accordance with the purposes related to TecAlliance's recruitment, management, and planning, and/or to comply with relevant laws and regulations. The details are as follows:

Purpose	Examples of Processing Your Personal Information	Basis
Job Application Management	<ul style="list-style-type: none"> – Process your job application – Contact you – Evaluate your Personal Information to assess whether it matches the position you are applying for – Arrange interviews – Once you accept the job offer, manage your onboarding and create an employee file 	Measures taken before the contract is signed
Pre-employment Screening and Background Check	<ul style="list-style-type: none"> – Review your background and other information submitted during the application, which may include obtaining additional employment and educational background information and criminal record information (where legally permitted) – Prepare the job offer and various documents used during the recruitment process (before onboarding) 	Measures taken before the contract is signed
Adding You to the TecAlliance Talent Pool	<ul style="list-style-type: none"> – Maintain our talent pool – Consider you as a potential candidate for future vacant positions at TecAlliance 	Legitimate interest of TecAlliance in supplementing its talent pool
Compliance with Legal and Regulatory Obligations	<ul style="list-style-type: none"> – Fulfill legal and regulatory obligations – Process requests for exercising your rights 	Statutory and regulatory obligations of TecAlliance
Others	<ul style="list-style-type: none"> – For human resources management and other business purposes, such as employee contract management, personnel file archiving, reporting, and necessary measures for legal compliance 	Legitimate interest of TecAlliance or statutory and regulatory obligations of TecAlliance

If you are hired, the Personal Information we collect related to your job application will become part of your employee file. Additional processing will be detailed in the “Employee Personal Information Processing Consent” provided to you upon onboarding.

4. Other Rules

If the information you provide contains the Personal Information of other users, you must ensure that you have obtained the necessary legal authorization before providing such Personal Information to us.

Furthermore, according to relevant laws, regulations, and national standards, we may process your Personal Information without seeking your authorization in the following circumstances:

- (1) When it is necessary for the personal information processor to fulfill legal obligations or statutory duties;
- (2) When it is necessary for the conclusion or performance of a contract in which you are a party;
- (3) When it is necessary to respond to public health emergencies or to protect the life, health, and property safety of individuals in emergency situations;
- (4) When processing your Personal Information that you have voluntarily disclosed or that has been legally disclosed within a reasonable scope as prescribed by law;
- (5) Other circumstances prescribed by laws or administrative regulations.

III. How We Entrust, Share, Transfer, and Publicly Disclose Your Personal Information

1. Entrustment of Processing

For the purposes described in this Privacy Policy, we may entrust third-party service providers to assist us in conducting related operations and services. For the companies, organizations, and individuals to whom we entrust the processing of Personal Information, we will sign strict confidentiality agreements with them, requiring them to process Personal Information in accordance with our instructions and other relevant confidentiality and security measures. The types of service providers may include human resources service providers, technical support service providers, etc.

2. Sharing

We do not share your Personal Information with any company, organization, or individual outside of our Company unless we have obtained your explicit, separate consent. The types of information shared, the purpose of sharing, and the contractual measures we take depend on the role of the third party involved.

Recipient	Purpose
TecAlliance GmbH (Headquarters in Germany)	– To fulfill the purposes described in this Privacy Policy, implement the recruitment process, and meet the needs of global human resource management.
Administrative or Judicial Authorities	– To comply with legal and regulatory requirements or mandatory requests from government authorities – Or in cases where there are allegations of legal or regulatory violations
Advisors, including third-party auditors, lawyers, and similar entities	– To manage potential disputes and other appropriate legal matters

3. Transfer

We will not transfer your Personal Information to any company, organization, or individual, except in the following circumstances:

- (1) Transfer with explicit consent: After obtaining your explicit consent, we may transfer your Personal Information to other parties.
- (2) Transfer in the event of mergers, acquisitions, or bankruptcy liquidation: In cases involving the transfer of Personal Information during mergers, acquisitions, or bankruptcy liquidation, we will require the new company or organization holding your Personal Information to continue to be bound by this Privacy Policy. If this is not possible, we will request that the new company or organization seek your authorization again.

4. Public Disclosure

We will only publicly disclose your Personal Information in the following situations:

- (1) After obtaining your explicit consent;
- (2) Disclosure based on legal requirements: We may publicly disclose your Personal Information if required by law, legal processes, litigation, or mandatory requests from government authorities.

IV. How We Store and Transfer Your Personal Information Across Borders

1. Retention Period

We will store your Personal Information for as long as necessary to achieve the purposes outlined in this Privacy Policy, unless a longer retention period is required by relevant laws and regulations.

TecAlliance will retain the Personal Information collected through job applications for future recruitment and application purposes. If you wish to delete your information, please contact us using the contact details provided in Section 8. We may also retain certain job application information if required by relevant laws and regulations or for the defense or prosecution of our legitimate rights.

2. Cross-border Transfer

For the purpose of global human resource management, and in compliance with relevant laws and regulations, TecAlliance Shanghai may need to transfer employee Personal Information across borders to TecAlliance GmbH, the headquarters in Germany. Details of this transfer will be provided in the “Employee Personal Information Processing Consent” given to you upon onboarding. The information will be stored in Europe. The overseas recipient will store your Personal Information in accordance with the provisions mentioned above. You can also contact the overseas recipient or exercise your Personal Information rights by emailing [Recruitment@tecalliance.net].

V. Your Rights as a Personal Information Subject

Under relevant laws and regulations, you have the right to access, correct, supplement, copy, transfer, delete, and restrict the processing of the Personal Information you have submitted.

1. Right to Access, Correct, and Supplement

You have the right to inquire about your Personal Information, except in cases specified by law. If you believe that your Personal Information is inaccurate or incomplete, you may correct or update it.

2. Right to Obtain a Copy of Your Personal Information

You have the right to obtain a copy of your Personal Information. You can contact us at any time, and in accordance with relevant laws and regulations and technical feasibility, we will provide you with a copy of your Personal Information.

3. Right to Delete Personal Information

In certain circumstances, you may have the right to request the deletion of your Personal Information.

4. Withdrawal of Consent, Restriction, or Refusal

You have the right to withdraw your consent, restrict, or refuse our processing of your Personal Information. Once you withdraw consent, restrict, or refuse our use of your Personal Information, it may impact the relevant recruitment process or our future employment relationship. We will cease processing the relevant Personal Information as per your request. **However, the withdrawal of consent, restriction, or refusal will not affect the legality of any Personal Information processing activities that were carried out based on your consent or authorization prior to the withdrawal.**

5. Responding to Your Requests

To ensure security, we may first request verification of your identity (requiring necessary written documents or other means) before processing your request. We will respond to your request within 15 business days or within the time frame specified by laws and regulations upon receiving the relevant request.

6. Situations Where We Cannot Respond to Your Request

- Matters related to national security.
- Matters related to public and people's safety.
- Matters related to criminal investigations, prosecutions, and tracking.
- If you abuse your rights.
- If it negatively impacts other organizations or any other individual.

VI. How We Protect Your Personal Information

As the Personal Information Processor, TecAlliance adopts a series of reasonable security measures to protect your Personal Information against attacks, destruction, loss, misuse, unauthorized access, disclosure, and other adverse situations.

Although we use reasonable physical, technical, or managerial safeguards to protect your Personal Information from unauthorized access, disclosure, alteration, or destruction, we cannot guarantee absolute security. You should exercise caution when deciding to transmit, send, or otherwise submit information to us.

VII. Updates to this Privacy Policy

To align with TecAlliance's future developments or changes in legal requirements, we reserve the right to modify this Privacy Policy at any time.

We will indicate the latest update date at the top of this Privacy Policy.

VIII. How to Contact Us

If you have any questions, complaints, or suggestions regarding this Privacy Policy or Personal Information protection matters, you can contact us by sending an email to People-organisation.cn@tecalliance.net.