

POLICY



**PERSONAL DATA  
PROTECTION**



Beyond inspection

## REVISION LOG / HISTORY

Revision	Prepared by	Date	Change Description
1.0	Tao He	2022/01/11	Initial version



CONTENTS

1 PURPOSE ..... 5

2 APPLICABILITY ..... 5

3 REFERENCES ..... 6

4 TERMS AND DEFINITIONS ..... 7

5 RESPONSIBILITIES ..... 8

6 PRINCIPLES ..... 9

7 STATEMENTS / REQUIREMENTS ..... 10

7.1 MANAGING PERSONAL DATA ..... 10

7.1.1 INITIAL PURPOSE ..... 10

7.1.2 SENSITIVE PERSONAL DATA ..... 10

7.1.3 CHANGE IN PURPOSE ..... 10

7.1.4 PERTINENCE ..... 10

7.1.5 COMMUNICATION ..... 10

7.1.6 PERSONAL DATA STORAGE ..... 10

7.1.7 PERSONAL DATA ACCURACY ..... 11

7.1.8 DATA CONTROLLER ..... 11

7.2 RESPECTING INDIVIDUALS' RIGHTS AND CHOICES ..... 11

7.2.1 INDIVIDUAL'S CHOICES ..... 11

7.2.2 CONSENT ..... 11

7.2.3 ACCESS TO INFORMATION ..... 11

7.2.4 TIMELINESS OF RESPONSE ..... 11

7.3 PROTECTING PERSONAL DATA ..... 11

7.3.1 RISK ASSESSMENT ..... 11

7.3.2 SECURITY MEASURES ..... 12

7.3.3 SAFEGUARDING SENSITIVE PERSONAL DATA ..... 12

7.3.4 SUPPLIERS MANAGEMENT ..... 12

7.3.5 EMPLOYEES ..... 12

7.3.6 INTERNATIONAL TRANSFERS ..... 12

7.4 INCIDENTS MANAGEMENT ..... 12

7.4.1 SECURITY BREACHES ..... 12

7.4.2 COMPLAINTS ..... 12

7.5 PERFORMANCE MONITORING, IMPROVEMENT ..... 12

7.5.1 RECORDS ..... 12

7.5.2 AUDITING ..... 13

7.5.3 CORRECTIVE ACTIONS ..... 13

7.5.4 CONTINUAL IMPROVEMENT ..... 13

APPENDIX: USERS DATA COLLECTION AND PROCESSING ..... 14

## INTRODUCTION

In the regular course of its business, Senergy Technical Services (STS) collects Personal Data from its clients, suppliers, employees, website users, job applicants, contractors, shareholders, partners and other third parties.

STS recognizes that Personal Data must be treated with caution.

We are committed to conducting our business in accordance with all relevant Data Protection and Privacy laws of the countries in which we operate and in line with the highest standards of ethical conduct.

Protection of Personal Data is important to every part of our business. It is at the heart of our promise to our clients, our values, our principles, our conduct and our success, and is essential to maintaining trust.

Stricter regulations coming into force and digitalization of our services are an opportunity for STS to remind our clients and the industry of our integrity in one of the most important areas of modern life – the protection of Personal Data.

If you have questions or comments about this policy, please contact us at [privacy@sts-certified.com](mailto:privacy@sts-certified.com).



## 1 PURPOSE

The purpose of this Policy is to establish the common and general principles and guidelines for conduct that are to govern STS Group with regards to personal data protection, ensuring compliance with applicable laws under all circumstances. In particular, this Policy guarantees the right to the protection of personal data for all natural persons who establish relations with the companies belonging to STS Group, ensuring respect for the rights to reputation and to privacy in the processing of the various categories of personal data from different sources and for various purposes based on their business activities, all in compliance with STS' Policy.

## 2 APPLICABILITY

This STS Data Privacy Policy applies to all affiliates and entities of STS Group.

It defines the conduct expected of each STS employee, officer and director when collecting, handling and processing personal data of STS' customers, suppliers, employees, contractors, and other third parties.

This policy defines STS' uniform and baseline standards which apply in the absence of more stringent rules which may be mandated by local laws.

Internal implementation rules, guidelines and training are provided with all necessary supporting documentation to act according to the STS Data Privacy Policy.

STS Group companies shall thoroughly comply with personal data protection laws in their jurisdiction, the laws that apply based on the processing of personal data that they carry out and the laws determined by binding rules or resolutions adopted within the Group.

STS Group companies shall also strive to ensure that the principles set forth in this Policy are taken into account

- (i) in the design and implementation of all procedures involving the processing of personal data;
- (ii) in the products and services offered thereby;
- (iii) in all contracts and obligations that they formalize with natural persons; and
- (iv) in the implementation of any systems and platforms that allow access by STS Group professionals or third parties to personal data and the collection or processing of such data.

### 3 REFERENCES

-	Personal Information Protection Law of the People's Republic of China
-	General Data Protection Regulation (GDPR), 2016/679



## 4 TERMS AND DEFINITIONS

### PERSONAL DATA

Any information relating to an identified, or identifiable, individual.

This may include the individual's:

- **Contact information** (Name, including initials, home and business address, telephone, email address)
- **Personal information** (Identification number, date of birth, citizenship, pictures, electronic identification data such as cookies, IP addresses and password, location data, Online identifier, such as a username)
- Professional and employment information (position, education, training)
- Financial information (tax identification, bank account details)
- It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.

### SENSITIVE PERSONAL DATA

Personal data which is more sensitive and needs increased protection, including information about an individual's:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetics
- Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes
- Health – physical or mental
- Sex life or sexual orientation

### PROCESSING

Anything done to personal data, such as collecting, recording, organizing, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.

Processing can be automated or manual.

### DATA SUBJECT

The identified or identifiable individual whose personal data is held or processed.

### DATA CONTROLLER

A person or organization that determines the purposes and the means of processing of personal data.

### DATA PROCESSOR

A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.

### PERSONAL DATA BREACH

A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data.

## 5 RESPONSIBILITIES

### IT DIRECTOR

The IT Director is the owner of this policy.

The IT director is responsible for the promotion of data protection, conducting awareness trainings and monitoring the implementation of the requirements of this policy.

The IT director is responsible for the investigation, reporting and treatment of personal data breaches.

### EMPLOYEES

Each STS employee, officer and director when collecting, handling and processing personal data of STS' clients, suppliers, employees, contractors, and other third parties is responsible for the implementation of the requirements of this policy, especially to maintain confidentiality of the data which they collect or process.





## 6 PRINCIPLES

### LAWFULNESS, FAIRNESS, TRANSPARENCY

Data are processed only when we have a good reason do so.  
information about what or why we collect data is not purposely withheld.  
We are clear, open and honest about who we are, and why and how we process data.

### LIMITED PURPOSE

Purposes for processing data are clearly established.

### DATA MINIMIZATION

Only the smallest amount data needed to complete the purpose is collected.

### ACCURACY

It is our responsibility to ensure the accuracy of the data collected.

### STORAGE LIMITATION

Data are stored for a justified length of time.

### INTEGRITY AND CONFIDENTIALITY

Data collected are secured from internal and external threats, including unauthorized or unlawful processing and accidental loss, destruction, or damage.

### ACCOUNTABILITY

Measures are in place are records kept as evidence of the implementation of these principles

## 7 STATEMENTS / REQUIREMENTS

### 7.1 MANAGING PERSONAL DATA

#### 7.1.1 INITIAL PURPOSE

We collect and process Personal Data only if either:

- (i) The data subject has provided a valid and informed consent; or
- (ii) it is required by STS legitimate business interests, such as entering into or performing contracts, processing and receiving payments, carrying out contractual obligations; or
- (iii) it is necessary to fulfill a legal obligation; or
- (iv) it is necessary for the protection of vital interest of a natural person; or
- (v) it is a public task done in the public interest; or
- (vi) we have a legitimate interest that is not overriding data subject's rights.

#### 7.1.2 SENSITIVE PERSONAL DATA

We recognize that some categories of Personal Data are particularly sensitive and require a higher level of protection. Sensitive Personal Data includes information regarding a person's health, biometric and genetic data, religion and political opinions, racial or ethnic origin, criminal records and any other information protected specifically by the relevant applicable privacy laws.

We collect and process such sensitive Personal Data only when this is absolutely necessary under one of the following circumstances:

- (i) Explicit consent was given by the individual
- (ii) The use is necessary for STS to comply with employment laws or other statutory obligations or to protect the health of the specific individual (such as in a medical emergency)

#### 7.1.3 CHANGE IN PURPOSE

We do not authorize the use of Personal Data by STS for a different purpose than initially communicated, unless adequate information is provided to the data subject, and where applicable, we obtain consent for the intended use.

In general, STS is authorized to use Personal Data for secondary purposes when implementing internal controls and audits and complying with its statutory and regulatory obligations.

#### 7.1.4 PERTINENCE

We collect and store the minimum amount of Personal Data required for the intended initial purpose for which the data is used and ensure that, at all times, Personal Data in our possession remains relevant and adequate for its intended purpose.

#### 7.1.5 COMMUNICATION

When collecting Personal Data, we inform clearly, honestly, and transparently about the nature of the Personal Data we collect and what we intend to do with it.

#### 7.1.6 PERSONAL DATA STORAGE

We keep Personal Data only for the period of time required by its intended purpose.

Specific retention policies define the time after which such data will need to be either deleted, destroyed or de-identified

### 7.1.7 PERSONAL DATA ACCURACY

We keep all data stored up to date and accurate and ensure it is corrected when required.

### 7.1.8 DATA CONTROLLER

When processing Personal Data on behalf of a client or another third party (a Data Controller), we comply with the guidelines and instructions of the Data Controller in addition to this policy.

## 7.2 RESPECTING INDIVIDUALS' RIGHTS AND CHOICES

### 7.2.1 INDIVIDUAL'S CHOICES

We respect individuals' rights to object to the use of their Personal Data or to opt out of receiving direct marketing communications.

When using Personal Data for marketing purposes, we respect the right of existing and prospective customers to:

- (i) only receive marketing communications from STS if we have a legitimate purpose to do so,
- (ii) no longer receive any marketing communications if a specific preference setting, an opt-out or an objection to use such data for marketing purposes has been received by STS

### 7.2.2 CONSENT

Any consent given by individuals to the collection and use of their Personal Data must be given freely and in response to a clear information by STS about the intended use of the data.

Such consent can be withdrawn anytime by the individual without undue complications.

The date, content and validity of such consent must always be documented.

### 7.2.3 ACCESS TO INFORMATION

We recognize the rights of individuals to:

- (i) Request access to the Personal Data collected on them by STS and the reason for STS having such data
- (ii) Obtain a copy of the Personal Data held on them
- (iii) Request the rectification or deletion of inaccurate or incomplete Personal Data

### 7.2.4 TIMELINESS OF RESPONSE

We will respond to requests made by individuals exercising their rights within a reasonable period of time after the individual's request or within any specific period that may be required by applicable local laws.

## 7.3 PROTECTING PERSONAL DATA

We implement adequate security measures to ensure the confidentiality, integrity and availability of Personal Data and to prevent the risk of unauthorized or unlawful access, alteration, destruction or disclosure of such data.

### 7.3.1 RISK ASSESSMENT

The measures for protection are based on impact assessments taking into account the risk to the individual related to specific Personal Data stored by STS.

We conduct Personal Data Impact Assessments to identify those risks that the processing of Personal Data by STS may cause to the privacy rights of individuals in order to eliminate or reduce such risks.

### 7.3.2 SECURITY MEASURES

Security measures include technical and organizational measures adapted to the type of processing and the nature of the data to be protected.

### 7.3.3 SAFEGUARDING SENSITIVE PERSONAL DATA

We implement specific safeguards to restrict access to sensitive data only by appropriate persons and prevent its unauthorized access, use and dissemination.

### 7.3.4 SUPPLIERS MANAGEMENT

We require from our suppliers and sub-contractors that they fully comply with STS Data Privacy Policies, with any applicable data protection and privacy legislation and maintain adequate technical and organizational security arrangements to protect Personal Data.

### 7.3.5 EMPLOYEES

We ensure that our employees maintain the confidentiality of personal data processing  
We limit access to Personal Data to employees who need to perform specific tasks in relation with such Data.  
We provide adequate awareness and confidentiality training to ensure that Personal Data is not shared or disclosed to unauthorized persons, including any other STS employees who do not need to access such Personal Data.

### 7.3.6 INTERNATIONAL TRANSFERS

When Personal Data is transferred, we ensure that we have taken steps to protect the Personal Data before transfer.  
We transfer Personal Data across national boundaries within the STS Group or outside the STS Group only when:

- (i) this is justified for business purposes and safeguards exist to ensure that Personal Data will continue to be protected at a minimum with the same level of protection required in the jurisdiction of origin.

## 7.4 INCIDENTS MANAGEMENT

### 7.4.1 SECURITY BREACHES

We will inform individuals promptly of any privacy breach that has compromised their Personal Data and will report such incident to the relevant authorities as required by applicable laws.

### 7.4.2 COMPLAINTS

We will handle and investigate complaints made by individuals about any breach of these rules or data privacy laws and will respond to such complaints in a timely manner.

## 7.5 PERFORMANCE MONITORING, IMPROVEMENT

### 7.5.1 RECORDS

We keep evidence of the actions taken.

### 7.5.2 AUDITING

We conduct regular audits to ensure the integrity and accuracy of data stored and to monitor the effectiveness of the measures taken to protect personal data.

### 7.5.3 CORRECTIVE ACTIONS

We take incidents, breaches and complaints seriously and respond to those in a timely manner to correct issues and prevent reoccurrence.

### 7.5.4 CONTINUAL IMPROVEMENT

We use the results of the monitoring activities to continuously improve the protection of personal data we collect and process.



## APPENDIX: USERS DATA COLLECTION AND PROCESSING

The table below provides information on data we collect and process in different situations.

CONTEXT	DATA	USAGE	LEGAL GROUNDS
Subscription to a service	<ul style="list-style-type: none"> <li>Name and surname</li> <li>Position, company name, department</li> <li>Email address</li> <li>Postal address (invoicing)</li> <li>Phone number</li> <li>Transaction information</li> <li>Payment information</li> </ul>	<ul style="list-style-type: none"> <li>Send a quote estimate</li> <li>Process and follow the subscription</li> <li>Manage the payment of the subscription</li> <li>Manage any contact between the subscriber and STS</li> <li>Manage any dispute relating to the subscription</li> <li>Run analytics</li> </ul>	Performance of a contract
Provision of a service	<ul style="list-style-type: none"> <li>Name and surname</li> <li>Position, company name, department</li> <li>Email address</li> <li>Phone number</li> <li>Commercial information relating to a service</li> <li>Details of the service</li> <li>Service Duration (subscription)</li> <li>Correspondence</li> <li>Identification data for access to our platforms</li> </ul>	<ul style="list-style-type: none"> <li>Provide the requested service</li> <li>Allow access to deliverables</li> <li>Manage contact during the service provision</li> <li>Manage the commercial relationship</li> <li>Manage requests and disputes relating to the service</li> <li>Monitor stakeholders' satisfaction</li> <li>Run analytics</li> </ul>	Performance of a contract
Newsletter and commercial communications	<ul style="list-style-type: none"> <li>Name and surname</li> <li>Position, company name</li> <li>Email address</li> <li>Phone number</li> <li>Location</li> </ul>	<ul style="list-style-type: none"> <li>Sending marketing communications</li> <li>Manage list of consenting recipients</li> <li>Run analytics</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interest</li> <li>Legal obligation (consent management)</li> </ul>
Online browsing	<ul style="list-style-type: none"> <li>Pages visited</li> <li>Duration of the visit</li> <li>Location</li> <li>IP address</li> <li>Browser information</li> <li>Device information</li> </ul>	<ul style="list-style-type: none"> <li>Send tailored marketing communications</li> <li>Improve our website experience for users</li> <li>Allow proper functioning of our website (display, language customization, adjustment to device parameters)</li> <li>Ensure website security and protect user against fraud or misuse of our services</li> <li>Run analytics</li> </ul>	Consent (for optional cookies not necessary for the functioning of the website)



CONTEXT	DATA	USAGE	LEGAL GROUNDS
Enquiries	<ul style="list-style-type: none"> <li>Name and surname</li> <li>Position, company name</li> <li>Email address</li> <li>Phone number</li> <li>Enquiry information shared with us</li> </ul>	<ul style="list-style-type: none"> <li>Answer the enquiry</li> <li>Contact the source of the enquiry, where applicable</li> <li>Run analytics</li> <li>Send quote estimates where applicable</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Performance of a contract</li> <li>Legitimate interest</li> </ul>
Job application	<ul style="list-style-type: none"> <li>Name and surname</li> <li>Contact details</li> <li>Postal address</li> <li>Phone number</li> <li>Email address</li> <li>Resume (qualifications, professional experience)</li> <li>Interview notes</li> </ul>	<ul style="list-style-type: none"> <li>Review candidates' applications</li> <li>Manage recruitment process</li> <li>Hire candidates</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interest</li> </ul>

