

Privacy Policy

隐私政策

This Privacy Policy (“Policy”) helps you to understand how we use your personal data (personal information), who we share it with and the rights that you have.

本**隐私政策**（“**政策**”）有助于您了解我们如何使用您的个人数据（个人信息）、我们与谁共享这些数据以及您拥有的权利。

About EMF

关于基金会

EMF (Ellen MacArthur Foundation (U.K.), Beijing Representative Office) is a Representative Office of Overseas NGO in China, with Unified Social Credit Identifier G1110000MCW006869N, registered and established by the Ellen MacArthur Foundation, a charity registered in England and Wales with charity number 130306.

基金会（艾伦·麦克阿瑟基金会（英国）北京代表处）是境外非政府组织在中国的代表处，统一社会信用代码为G1110000MCW006869N，由艾伦·麦克阿瑟基金会注册成立，该基金会是一家在英格兰和威尔士注册的慈善机构，慈善编号为130306。

For the purpose of data protection laws, in relation to any personal data collected from you, EMF is the data processor under Personal Information Protection Law of the People's Republic of China (“**PIPL**”).

基于数据保护法的目的，对于从您处收集的任何个人数据，**基金会**是中华人民共和国《个人信息保护法》（“**PIPL**”）下的数据处理者。

Our contact details

我们的联系方式

Beijing Representative Office:

北京代表处:

Address: Room 1805 Tower 1, Prosper Center, 5 Guanghua Rd, Chaoyang District, Beijing, China

地址: 中国北京市朝阳区光华路5号世纪财富中心东塔1805室

Email: privacy@ellenmacarthurfoundation.org

电子邮件: privacy@ellenmacarthurfoundation.org

Ellen MacArthur Foundation and Ellen MacArthur Foundation Trading Limited
The Sail Loft, 42 Medina Rd, Cowes, Isle of Wight PO31 7BX, United Kingdom

Data Protection Officer: Jo Bootle

+44 (0) 1983 296463

privacy@ellenmacarthurfoundation.org

艾伦·麦克阿瑟基金会和艾伦·麦克阿瑟基金会贸易有限公司

The Sail Loft, 42 Medina Rd, Cowes, Isle of Wight PO31 7BX, United Kingdom

数据保护官: Jo Bootle

+44 (0) 1983 296463

privacy@ellenmacarthurfoundation.org

This privacy policy applies when

本隐私政策适用于以下情况:

- You attend our offices
您访问我们的办事处
- You use our websites or community platform
您使用我们的网站或社区平台
- We provide services to you
我们为您提供服务
- You request information from us or provide information to us
您向我们索取信息或向我们提供信息
- You make an application or provide material to us
您向我们提出申请或提供材料
- You are employed or otherwise engaged by us to provide services
您受雇于或以其他方式受聘于我们以提供服务

- You attend events or webinars or participate in projects hosted by us

您参加我们主办的活动、网络研讨会或项目

- You are added to our mailing lists

您被添加到我们的邮件列表

- You apply to work for us

您申请为我们工作

The data we collect

我们收集的数据

The type of personal data we typically collect includes **your name, contact details such as email address, phone number and address, and your organisation and job title. When you use our websites or other digital platforms, we may collect your IP address, your actions on our website and your marketing preferences** (where they have been indicated). We may ask you to provide additional personal data such as your nationality where it is necessary. You may choose to provide additional data to us, such as your professional photograph. **We may collect specific data related to an event, such as your dietary requirements, which we will only hold for the purpose of delivering the event.**

我们通常收集的个人信息类型包括您的姓名、联系方式（如电子邮件地址、电话号码和地址）以及您的单位和职务。当您使用我们的网站或其他数字平台时，我们可能会收集您的IP地址、在我们网站上的行为以及营销偏好（在已注明的地方）。如有必要，我们可能会要求您提供更多的个人信息，如您的国籍。您可以选择向我们提供更多的数据，如您的职业照片。我们可能会收集与活动相关的特定数据，例如您的饮食要求，这些数据我们会仅出于举办活动的目的予以持有。

If you apply to work for us, we may collect data such as your **gender, marital status, dependents and next of kin, medical and health information, employment references and work history, visa and right to work information, bank account and tax information, details of criminal convictions, and data used for equal opportunities monitoring such as sexual orientation, religion and ethnic information.**

如果您申请为我们工作，我们可能会收集的数据包括您的性别、婚姻状况、被抚养人和最近的亲属、医疗和健康信息、就业推荐人和工作经历、签证和工作权利信息、银行账户和税务信息、刑事犯罪的详情，以及用于平等机会监督的数据，如性取向、宗教和种族信息。

How we obtain your personal data

我们如何获取您的个人信息

We collect your personal data from you directly, and indirectly from your organisation or other organisations we work with. We may also receive personal data from third parties, such as your former employers, employment agencies, medical and health professionals, regulatory bodies and from publicly available sources.

我们直接从您处收集，以及/或间接从您的单位或我们合作的其他单位那里收集您的个人数据。我们也可能会从第三方处收集个人数据，如您的前雇主、职业中介机构、医疗和健康专业人士、监管机构以及公开渠道。

How we use your personal data

我们如何使用您的个人数据

We use your personal data for different purposes, depending on the reason you have given it to us or we have otherwise collected it.

我们出于不同的目的使用您的个人数据，这取决于您向我们提供这些数据或我们以其他方式收集这些数据的原因。

Our offices If you visit our offices, you may be recorded on our CCTV systems and your data may be entered into our databases to make a record of your visit.

我们的办公室 如果您访问我们的办公室，您可能会被我们的闭路电视系统记录，您的数据可能会被输入我们的数据库，以记录您的访问。

Our websites and community platform If you use our websites, we may use your data to personalise and improve your experience of our website. Where you submit content to or make an application via our websites, we will use your data to process that content or application.

我们的网站和社区平台 如果您使用我们的网站，我们可能会使用您的数据来个性化和改善您在我们网站的体验。如果您给我们网站提交内容或通过我们网站提出申请，我们将使用您的数据来处理该内容或申请。

If you use our websites to apply to participate in Circulytics or the Global Commitment, we will use your data to process your application. If your application is accepted, we will use your data in accordance with the ‘Our network and stakeholders’ section below.

如果您使用我们的网站申请参加 Circulytics 或全球承诺项目，我们将使用您的数据来处理您的申请。如果您的申请被接受，我们将根据下面的“我们的伙伴网络和利益相关方”部分使用您的数据。

If you apply to join our community platform, we will use your data to process your application and, if you are accepted, to generate your profile. If you choose to make your profile visible to others on the platform, we will use your data to do this. You can choose to hide your profile if you no longer wish this data to be visible.

如果您申请加入我们的社区平台，我们将使用您的数据来处理您的申请，并且，如果您的

申请被接受，我们将生成您的资料。如果您选择让平台上的其他人看到您的资料，我们将使用您的数据来做到这一点。如果您不再希望这些数据被看到，可以选择隐藏您的资料。

We use cookies on our websites. Please refer to our cookie policy for more information.

我们在网站上使用 cookies。更多信息请参考我们的 cookie 政策。

Our network and stakeholders If you are a member of our network or part of a group of stakeholders we work with, we will use your data to communicate with you about your work with us (including in the application process to join our network) and provide details of EMF's or other stakeholders' activities which may be relevant to you, including through email marketing newsletters, where appropriate.

我们的伙伴网络和利益相关方 如果您是我们伙伴网络的成员或是与我们合作的利益相关方团体的一员，我们将使用您的数据与您交流您与我们相关的工作的情况（包括在申请加入我们伙伴网络的过程中），并提供基金会或其他利益相关者可能与您相关的活动的详细信息，包括（在适当的时候）通过电子邮件推广新闻简报。

Suppliers If you provide services to us, we will use your data so we can both fulfil our obligations under the contract between us.

供应商 如果您向我们提供服务，我们将使用您的数据，以便我们双方都能履行我们之间的合同义务。

Events and webinars If you participate (or sign up to participate) in one of our events, we may process your personal data (such as your name, email, biography and other data you choose to provide to us) to communicate with you about the event, to provide the event to you and to follow up with you after the event with relevant information.

活动和网络研讨会 如果您参加（或报名要参加）我们的某一个活动，我们可能会处理您的个人数据（比如您的姓名、电子邮箱、个人简介以及其他您选择提供给我们的信息）用于与您沟通活动相关事宜，为您提供活动，并在活动后就相关信息与您后续跟进。

If we take photos, videos or audio recordings at an event (whether in-person or online), we may use those photos and recordings for purposes consistent with our charitable objectives (including sharing them with third parties - see 'how we share your information' below).

如果我们在活动期间拍摄照片、视频或者录音（不论线下还是线上），我们可能将这些照片和录制用于与基金会慈善目标相关的用途（包括与第三方分享 – 请阅读“我们如何分享您的数据”）。

If you participate in an online event which is held over audio or video conferencing, and you make your name and/or your image available to view, we may use this data to make a recording of the event. We may use that recording for purposes consistent with our charitable objectives, including sharing the recording with other participants in the event and making the recording available to the public via our website and social media channels.

如果您通过音频或视频会议参加线上活动，并且公开了您的姓名和/或形象，我们可能会使用这些数据来录制活动。我们可能基于与我们的慈善目的一致目的使用该录制，包括与活动的其他参与者分享该录制，以及通过我们的网站和社交媒体渠道向公众提供该录制。

Newsletters (email marketing) If you sign up to receive EMF's newsletter, we will use your data to send you the newsletter.

新闻简报（电子邮件推广） 如果注册接收基金会的新闻简报，我们将使用您的数据向您发送该新闻简报。

If you are part of certain programmes or initiatives, we may use your data to send you tailored newsletters on those programmes or initiatives.

如果您参与了某些项目或计划，我们可能会使用您的数据向您发送这些项目或计划的定制新闻简报。

We actively monitor our email subscription lists to ensure they are up to date. We use a third-party service provider to monitor these lists and to send you these emails.

我们实时地监测我们的电子邮件订阅列表，以确保它们是最新的。我们使用第三方服务供应商来监测这些列表，并向您发送这些电子邮件。

Job applicants If you apply to work for us, we will use your personal data to assess your suitability for the role you have applied for, to check your right to work, to assess your health and safety needs, to obtain expert medical opinions when making decisions about your fitness for work, to make decisions regarding salary and benefits, in business planning and restructuring exercises, when dealing with any legal claims made against us, and to prevent fraud or corruption.

求职者 如果您申请为我们工作，我们将使用您的个人数据来评估您是否适合您申请的职位，核查您的工作权利，评估您的健康和安全需求，在决定您是否适合工作时获得专家的医疗意见，做出有关工资和福利的决定，在业务规划和重组工作中，当处理对我们提出的任何法律索赔时，以及防止欺诈或腐败。

Our Legal Basis

我们的法律依据

Under the PIPL and the privacy law of the relevant jurisdiction, we are required to have a legal basis to process your personal data. The legal bases we rely on are set out below.

根据《个人信息保护法》和相关司法管辖区的隐私法，我们需要有法律依据来处理您的个人数据。我们的法律依据如下。

Contractual obligation: where we have a contract with you or your organisation, we use your data to fulfil that contract. For example, we may contact the individual named in the contract to discuss the operation of the contract, or if there are any disputes in relation to it. You may be bound by the contract to provide some personal data to us (such as details of an individual to whom formal notices

should be sent) and if you do not provide this data, we may be unable to fulfil the contract.

合同义务：如果我们与您或您的单位之间存在合同，我们将使用您的数据来履行合同。例如，为了讨论合同的执行，或者在如果有任何与合同相关的争议的时候，我们可能会联系合同中指定的个人。您可能因为合同的要求而向我们提供一些个人数据（例如应向其发送正式通知的个人的详细信息），如果您不提供这些数据，我们可能无法履行合同。

Legitimate interest: where we have a legitimate interest in processing your data, we will do so provided that it is necessary and your interests do not outweigh the legitimate interest. We rely on this basis when you would reasonably expect for us to use your data in this way. This includes sending you information relevant to projects you are involved in, or sharing your data with third party providers who support our core operations, such as IT service providers or contractors.

合法利益：如果我们在处理您的数据方面具有合法利益时，我们会这样做，但前提是这是必要的，并且您的利益不会大于该合法利益。当您合理地期望我们以这种方式使用您的数据时，我们依赖于此基础。这包括向您发送与您参与的项目的相关信息，或者与支持我们核心运营的第三方供应商（如 IT 服务供应商或承包商）共享您的数据。

Our legitimate interests include furthering our charitable objectives, promoting the idea of a circular economy, and the broader societal benefits that a move towards a circular economy will create. Our legitimate interests also provide benefits to those we interact with, including helping individuals learn about the circular economy, and supporting our stakeholders to implement the principles of a circular economy in their work. When considering applications to work for us, we have a legitimate interest in employing appropriately skilled people.

我们的合法利益包括推进我们的慈善目标，推广循环经济的理念，以及转向循环经济将创造的更广泛的社会效益。我们的合法利益也有益于和我们互动的个人与相关方，包括帮助个人了解循环经济，以及支持我们的利益相关方在工作中践行循环经济的原则。在考虑为我们工作的申请时，我们有雇用具有适当技能的人员的合法利益。

Consent: you may provide your consent to us processing your data. Where we rely on your consent as a legal basis, you are able to withdraw your consent at any time. You can do this by contacting our Data Protection Officer using the contact details listed above. If you receive any of our email newsletters, you will be able to withdraw your consent by clicking the unsubscribe link at the bottom of the email.

同意：您可以同意我们处理您的数据。在我们以您的同意作为法律依据的情形下，您可以随时撤回您的同意。您可以通过上方列出的联系方式联系我们的数据保护官以撤回您的同意。如果您收到我们的任何电子邮件简报，您可以通过单击电子邮件底部的取消订阅链接来撤回您的同意。

Legal obligation: where we are required to provide data to a third party by law, we will provide that data to that third party.

法律义务：当法律要求我们向第三方提供数据时，我们将向该第三方提供该数据。

Other legal basis in accordance with PIPL Article 13.

根据《个人信息保护法》第 13 条的其他法律依据。

Special Categories of Data

特殊类别的数据

We process special categories of data in accordance with PIPL and the privacy law of the relevant jurisdiction, which imposes stricter rules on what we can do with that data compared with other personal data. Special categories of data include data relating to your health, gender, sexual orientation, race, ethnic origin, religion, trade union membership, criminal convictions, etc., that once leaked or illegally used, may easily cause harm to human dignity or personal or property safety. Typically, we only process such data when you apply to work for us. We may be required by law to ask for some of this data, and if you do not provide it to us, we may be unable to process your application. We may ask for your dietary requirements where we are hosting an event at which we may provide food to you. Your dietary requirements may reveal personal data relating to your religion, and may therefore be considered special category data.

我们根据《个人信息保护法》和相关司法管辖区的隐私法处理特殊类别的数据，与其他个人数据相比，这些法律对我们可以如何处理这些类别的数据有更严格的规定。特殊类别的数据包括与您的健康、性别、性取向、种族、民族、宗教、工会成员、刑事定罪等相关的数据，这些数据一旦泄露或被非法使用，容易对人的尊严或人身或财产安全造成损害。通常，我们只在您申请为我们工作时处理这些数据。法律可能会要求我们收集这些数据，并且如果您不向我们提供这些数据，我们可能无法处理您的申请。在我们举办活动并向您提供食物时，我们可能会询问您的饮食要求。您的饮食要求可能会透露与您的宗教信仰相关的个人数据，因此可能会被视为特殊类别的数据。

How we may share your data

我们如何分享您的数据

We may share your personal data with other members of our charitable group. Our charitable group includes our subsidiaries and any associated companies or charities, including those in the EEA, the United States, China and Brazil. Where necessary, your data will be added to our databases, and may be accessed by our staff worldwide. Where your data is used in other countries, we have taken steps to ensure that the personal data is appropriately protected.

我们可能会与慈善集团的其他成员分享您的个人数据。我们的慈善集团包括我们的子公司和任何关联公司或慈善机构，包括在欧洲经济区、美国、中国和巴西的公司或慈善机构。必要时，您的数据将被添加到我们的数据库中，并可能被我们在世界各地的员工访问。如果您的数据在其他国家被使用，那么我们已经采取措施确保个人数据得到适当保护。

We may also share personal data with selected third parties including our partners, agents, service providers and legal and professional advisors where it is necessary to do so as part of our activities. When we share data with third parties, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security obligations. We may also share personal data with third parties if we are under a duty to disclose it

in order to comply with any law or legal obligation (including to investigate or prevent crime), or to protect our rights, our property or the safety of others. We may also share your personal data with other third parties where you have consented to us doing so.

当作为我们活动的一部分，必要时我们还可能与选定的第三方共享个人数据，包括我们的合作伙伴、代理、服务供应商以及法律和专业顾问。当我们与第三方共享数据时，我们会制定合同性的安排和安全机制来保护数据，并遵守我们的数据保护、保密和安全义务。如果为了遵守任何法律或法律义务（包括调查或预防犯罪），或者为了保护我们的权利、我们的财产或他人的安全，我们有义务披露个人数据，我们也可能会与第三方共享这些数据。在您同意的情况下，我们也可能与其他第三方共享您的个人数据。

When you participate (or sign up to participate) in one of our events, we may share your personal data (such as your name, email, biography and other data you choose to provide to us) with other event participants and third parties we work with in organising, hosting and promoting the event.

如果您参加（或报名要参加）我们的某一个活动，我们可能会将您的个人数据（比如您的姓名、电子邮箱、个人简介以及其他您选择提供给我们信息）分享给其他活动参与者或与我们合作筹办、组织和宣传活动的第三方。

We may share photos and audio and/or video recordings taken at events with other event participants and third parties we work with in organising, hosting and promoting the event, and we may make them available to the public via our website and social media channels or include them in other materials we create in support of our charitable objectives.

我们可能将活动期间拍摄的照片、录音和/或视频分享给其他活动参与者及与我们合作筹办、组织和宣传活动的第三方，以及我们可能将活动期间拍摄的照片、录音和/或视频通过我们的网站和社交媒体渠道公开，或将活动期间拍摄的照片、录音和/或视频包含在其他我们制作的支持我们慈善目标的材料中。

How we store your personal data

我们如何存储您的个人数据

Your personal data is stored securely on EMF's internal systems and by third-party hosts who implement secure data storage procedures.

您的个人数据会安全地存储在基金会的内部系统和实施安全数据存储程序的第三方主机中。

We will only hold your personal data for as long as necessary for the purposes for which it was collected, or if we are required to hold it for operational or legal purposes. We will periodically review the personal data we hold to determine whether it is still necessary for us to be holding it for those purposes. We may contact you to check whether you still want us to hold your personal data if we cannot establish whether we have heard from you in 18 months. If we cannot establish whether we have heard from you in three years, we will dispose of your personal data securely by erasing it from our systems.

我们只在收集您的个人数据的目的所需的时间内，或者如果我们被要求为运营或法律目的而持有您的个人数据时，才会持有您的个人数据。我们将定期审查我们持有的个人数据，

以确定我们是否仍有必要出于这些目的而持有这些数据。如果我们无法确定是否在 18 个月内收到了您的消息，我们可能会联系您，以确定您是否仍然希望我们持有您的个人数据。如果我们无法确定是否在三年内收到了您的消息，我们将通过从系统中删除您的个人数据来安全地处理您的个人数据。

The above timeframes do not apply to data collected from you when you apply to work for us. If you are an employee, further details of how employee data is processed and can be found in your contract of employment and EMF's employee policies. If your application to work for us is unsuccessful, we will hold your personal data (including your CV) for twelve months from the date you are notified that you are unsuccessful. In certain circumstances we may need to keep your data for a longer period, in which case we will notify you, together with the reasons for the proposed extended retention period.

当您申请为我们工作时，上述时间范围不适用于从您那里收集的数据。如果您是一名员工，您可以在劳动合同和基金会的员工手册中找到关于如何处理员工数据的更多细节。如果为我们工作的申请未能成功，我们将从通知您不成功之日起持有您的个人数据（包括您的简历）12 个月。在某些情况下，我们需要持有您的数据的时间可能会更久，在这种情况下，我们将通知您，并说明建议延长持有期的原因。

Transferring data overseas

向海外传输数据

Your personal data may be transferred to, stored at, and/or processed by people or organisations working in other countries outside of China. This includes transferring data to other members of our charitable group, and our partners, agents, service providers and legal and professional advisors. Any such transferral, storage or processing will be undertaken in accordance with the PIPL and the privacy law of the relevant jurisdiction. We will take all steps reasonably necessary to ensure that your personal data is transferred, stored and processed securely.

您的个人数据可能被转移、存储和/或由在中国以外的其他国家工作的个人或组织处理。这包括将数据传输给我们慈善集团的其他成员、我们的合作伙伴、代理、服务供应商以及法律和专业顾问。任何此类转移、存储或处理将根据《个人信息保护法》和相关司法管辖区的隐私法进行。我们将采取一切合理必要的步骤来确保您的个人数据被安全地传输、存储和处理。

Your data protection rights

您的数据保护权利

Data subjects (people) about whom we hold personal data have the following rights under data protection law. You have different rights depending on the legal basis we have for using your data. If you have any questions about your rights in relation to your personal data, please contact our Data Protection Officer using the contact details listed above.

根据数据保护法，我们持有其个人数据的数据主体（人）拥有以下权利。根据我们使用您的数据的法律依据，您拥有不同的权利。如果您对自己的个人数据权利有任何疑问，请使

用上方列出的联系方式联系我们的数据保护官。

A right to be informed and decide on the processing of your personal data.

被告知并决定如何处理您的个人数据的权利。

A right of access: you have the right to ask us for copies of your personal data.

访问权：您有权要求我们提供您个人数据的副本。

A right to withdraw your consent to us handling your personal data.

撤回您同意我们处理您的个人数据的权利。

A right to rectification: you have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

纠正权：您有权要求我们纠正您认为不准确的个人数据。您也有权要求我们补充完整您认为不完整的信息。

A right to erasure: you have the right to ask us to erase your personal data in certain circumstances.

删除权：在某些情况下，您有权要求我们删除您的个人数据。

A right to restriction of processing: you have the right to ask us to restrict the processing of your personal data in certain circumstances.

限制处理的权利：在某些情况下，您有权要求我们限制对您个人数据的处理。

A right to object to processing: you have the right to object to the processing of your personal data in certain circumstances.

反对处理的权利：在某些情况下，您有权反对处理您的个人数据。

A right to data portability: you have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

数据可携带性的权利：您有权要求我们将您提供给我们的个人数据转移给另一个单位，或在特定情况下转移给您。

A right to ask us to explain our rules of processing of personal data.

要求我们解释我们处理个人数据的规则的权利

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

您无需为行使您的权利支付任何费用。如果您提出请求，我们将在一个月内回复您。

How to complain

如何投诉

If you have any concerns about our use of your personal data, you can make a complaint to us via our Data Protection Officer using the contact details listed above.

如果您对我们使用您的个人数据有任何疑问担心，您可以使用上方列出的联系方式通过我们的数据保护官向我们投诉。

You may also contact EMF to make a complaint regarding our personal data processing activities using the contact details listed above.

您也可以联系基金会，使用上方列出的联系方式对我们的个人数据处理活动进行投诉。

You can also complain to the Cyberspace Administration of China (<http://www.cac.gov.cn/>) if you are unhappy with how we have used your data.

如果您对我们使用您的数据的方式不满意，您也可以向中国网信办投诉 (<http://www.cac.gov.cn/>)。