Anode Sustainability Certification Promotion Services

Privacy Policy
隐私政策

PY09-ASCP

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ASCP is committed to contributing to a harmonious and lasting natural, social and business environment! ASCP 致力于为和谐持久的自然、社会和商业环境做出贡献！

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1.0　　Purpose 目的

The purpose of this policy is to ensure ASCP takes all reasonable steps to manage personal information in an open, secure and transparent manner.本政策的目的是确保雅高采取一切合理措施，以公开、安全和透明的方式管理个人信息。

As an legal entity , ASCP ensures that all personal information is managed according to the Criminal Law of the P.R.C., Cyber Security Law of the P.R.C., General Provisions of the Civil Law of the P.R.C., and State Intelligence Law of the P.R.C.作为一个法人实体，ASCP 确保所有的个人信息按照《中华人民共和国刑法》、《中华人民共和国网络安全法》、《中华人民共和国民法通则》和《中华人民共和国国家情报法》进行管理。

2.0　　Scope 范围

2.1.　　This policy applies to all ASCP employees, contractors, the Leadership Team and a designated privacy officer.本政策适用于所有 ASCP 员工、承包商、领导团队和指定的隐私官。

2.2.　　This policy applies to all employees of (prospective) clients and auditees, who are involve in certification and evaluation activities.本方针适用于参与认证和评价活动的（潜在）客户和被审核方的所有员工。

3.0　　Terms and Definitions 术语和定义

Privacy officer: an independent position at HR unit to manage all privacy matters.隐私官：一个独立的人力资源部门职位去管理隐私事务。

4.0　　Application 申请

ASCP fosters a culture of privacy, and treat all personal information gathered as part of audit and other activities as a valuable business asset to be respected, managed and protected.ASCP 培养隐私文化，并将作为审核和其他活动的一部分收集的所有个人信息视为有价值的商业资产，应予尊重、管理和保护。

4.1.　　Personal and sensitive information collected by ASCP includes:ASCP 收集的个人和敏感信息包括：

● Contact details, such as name, address, phone numbers and email address;联系方式，如姓名、地址、电话号码和电子邮件地址；

● Personal details, such as date of birth, gender, employment history, educational qualifications;个人详细信息，如出生日期、性别、工作经历、学历等；

● Photos, videos and other reasonably identifiable electronic media;照片、视频和其他可合理识别的电子媒体；

● National, Provincial, city or organisational generated personal identifiers and codes;国家、省、市或组织生成的个人标识符和代码；

● Memberships and registrations with professional bodies ;专业团体的会员资格和注册；

● Any current conflicts of interest including information about an individual's membership or

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leadership of an association or company;任何当前的利益冲突，包括个人在协会或公司的成员资格或领导地位的信息；

- Bank account, credit card and other financial details; and 银行账户、信用卡和其他财务信息；和

- Details of complaints or requests to access information.投诉或请求获取信息的详细信息。

4.2.   Collection of solicited sensitive personal information 收集征求的敏感个人信息

Sensitive personal information includes:敏感的个人信息包括：

- Medical or health information;医疗或健康信息；

- Racial or ethnic origin; and 种族或民族出身；和

- Religious affiliation.宗教关系。

4.3.   ASCP collects information from an individual or company by way of:ASCP 会透过以下方式向个人或公司收集资料：

- Required company forms and e-forms, for example personal onboarding information, audit certification registration, audit schedules and participant lists, contractor tax details and invoices etc. Meetings, interviews or telephone calls minuted with an individual or company representative;所需的公司表格和电子表格，例如个人入职信息、审核认证注册、审核时间表和参与者名单、承包商税务详细信息和发票等。与个人或公司代表的会议、访谈或电话记录；

- Business cards received from an individual or company representative;个人或公司代表寄来的名片；

- Registration details for online information or e-newsletters provided by an individual or company representative;个人或公司代表提供的在线信息或电子通讯的注册详情；

- Website access where this privacy policy is located or linked; and 访问本隐私政策所在或链接的网站；和

- Publicly available records.公开记录。

ASCP also collects personal information:ASCP 亦会收集个人资料：

- Through Auditor contractors who perform audit services, such as - during the delivery of an audit activity, gathering and viewing relevant information to complete reports, interviewing participants, families, advocates and staff of organisations to verify compliance;通过提供审核服务的审核承包商，例如在进行审核活动期间，收集和查看相关信息以完成报告，采访参与者、家属、倡导者和机构员工以核实合规情况；

- To meet the requirements of specific standards and regulatory frameworks; and 符合特定标准和监管框架的要求；和

- Through government departments at all levels and agencies, including the national customs, bureau of labor and social security, environmental protection bureau,etc., and through ASCP external and internal Business partners .通过各级政府部门和机构，包括国家海关、劳动和社会保障局、环保局等。并通过 ASCP 外部和内部的业务合作伙伴。

4.4.   Collection of solicited information for children or vulnerable individuals 收集儿童或弱势群体的信息

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- Personal and sensitive information is only collected for some certifications audit activities; 仅在某些认证审核活动中收集个人和敏感信息；

- All information collected uses client generated codes to preserve individual anonymity; 所有收集的信息使用客户端生成的代码，以保护个人匿名；

- All information collected, in electronic or hard copy, is kept in password protected files; and 所有收集的电子或硬拷贝信息都保存在密码保护的文件中；和

- All employees and contractors have current Working with Children Checks and National Police Checks and sign a Code of Conduct and strict Confidentiality and Fit and Proper Personas declarations at induction. 所有员工和承包商都进行了当前的儿童工作检查和国家警察检查，并在入职时签署了一份行为准则、严格的保密和合适的角色声明。

4.5. Consent to collect, hold, use, disclose and dispose of personal information 同意收集、持有、使用、披露和处置个人信息

ASCP uses all reasonable means to seek consent from individuals or companies involved in audit or business activities to collect, hold, use, disclose and dispose of personal and sensitive information that is reasonably identifiable under the laws. Consent will be sought in writing wherever possible, or verbally where the individual may be witnessed by an identified advocate or person responsible.ASCP 使用一切合理的手段征求参与审核或商业活动的个人或公司的同意，以收集、持有、使用、披露和处置根据法律可以合理识别的个人和敏感信息。在可能的情况下，将以书面形式征求同意，在可由确定的辩护人或负责人见证的情况下，则以口头形式征求同意。

4.6. Use and of personal information 个人信息的使用

ASCP takes all reasonable steps to ensure that all personal information held in electronic or hard copy is only used for the following circumstances:本会采取一切合理措施，确保所有以电子或硬拷贝形式保存的个人资料只用于以下情况：

- Workforce management and planning;劳动力管理和规划；

- Contract management;合同管理；

- Audit activities;审核活动；

- Reporting activities;报告活动；

- Emergency and crisis management;紧急和危机管理；

- Mandatory reporting and other regulatory or legislative requirements;强制性报告和其他法规或立法要求；

- Risk management;风险管理；

- Gathering research data for internal measurement and sector development; and 为内部测量和行业发展收集研究数据；和

- Quality control activities.质量控制活动；

4.7. Disclosure of personal information 个人信息披露

ASCP has a process available for an individual or a regulatory agency to make an access request.ASCP 为个人或监管机构提供了一个流程来提出访问请求。

ASCP discloses personal information in the following circumstances:本公司在下列情况下披露个人

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信息：

- Identity of the individual who requests to access own information is verified using laws guidelines;要求访问自己信息的个人的身份将根据法律准则进行验证；

- Request from a verified officer of a government agency for the purposes of mandatory reporting, other illegal conduct or fraud; and 政府机构经核实的官员为强制报告、其他非法行为或欺诈而提出的要求；和

- Court subpoena.法院传票。

ASCP will not adopt a government related identifier of an individual as an internal identifier for business or audit activities, or use or disclose a government related identifier at any time.ASCP 不会在任何时候采用与政府相关的个人标识符作为商业或审核活动的内部标识符，也不会使用或披露与政府相关的标识符。

4.8. Security and protection of personal information 个人信息的安全和保护

ASCP takes all reasonable steps to protect and secure the personal information held from misuse, interference, loss and from unauthorised access, modification and disclosure.ASCP 采取一切合理措施保护和保护所持有的个人信息，使其免受滥用、干扰、丢失以及未经授权的访问、修改和披露。

ASCP also takes all reasonable steps to destroy and de-identify personal information held once it is no longer required for business and audit purposes.一旦不再需要用于业务和审核目的，ASCP 还将采取一切合理措施销毁所持有的个人信息并消除其身份。

All personal information collected by ASCP is held electronically on ASCP secure information systems of Secured personal information can only be accessed by authorised employees with password controls. Contractors who require personal information access for client audit activities will have time limited access only.ASCP 收集的所有个人信息都以电子方式保存在 ASCP 的安全信息系统上。受保护的个人信息只能由授权的员工访问，并设置密码控制。需要为客户审核活动访问个人信息的承包商只能有时间限制的访问权限。

All employees and contractors, committee members and the board undertake induction and annual training in the ASCP Privacy Policy and procedures to promote a culture of privacy and maximise the protection of individual and sensitive information.所有雇员、承办商、委员会成员及董事会均须接受入职培训及每年一次的私隐政策及程序培训，以促进私隐文化，并尽量保护个人及敏感资料。

Personal information is held in hard copy in some instances. Hard copy information is protected in locked cabinets accessed by authorised employees and contractors only. Access to hard copy personal information for contractors is limited to the audit activities they are contracted to deliver. 在某些情况下，个人资料以硬拷贝形式保存。硬拷贝信息被锁在只有授权员工和承包商才能访问的柜子里。承包商获取硬拷贝的个人信息仅限于他们签订合同交付的审核活动。

4.9. De-identification and destruction of personal information 个人信息的识别和销毁

Personal or sensitive information gathered about client's participants (including children and vulnerable persons) and employees as part of audit activities, will be de-identified at all times and will be destroyed or deleted within 30 days of ASCP granting certification to a client. Some personal information may be held for business purposes only including employee and contractor information.作为审核活动的一部分，收集到的客户参与者（包括儿童和弱势群体）和员工的个人或敏感信息将在任何时候被去识别，并在 ASCP 向客户授予认证后 30 天内销毁或删除。某些个人信息可能仅用于商业目的，包括员工和承包商信息。

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4.10. Anonymity and pseudonymity 匿名和假名

ASCP, in order to verify evidence for certification frameworks, will make available options for anonymity to clients' participants (customers), employees, volunteers and other parties who will be required to supply personal and some sensitive data during audit activities.为了验证认证框架的证据，ASCP 将为在审核活动中需要提供个人和某些敏感数据的客户参与者（客户）、员工、志愿者和其他各方提供匿名选项。

4.11. Unsolicited information 未经请求的信息

ASCP does not use direct marketing processes or disclose personal or sensitive information to any overseas parties or organisations. From time to time unsolicited information can be received by employees and contractors in the course of audit activities. Unsolicited information is maintained securely in the same manner as all other information and follows our strict digital and document processes.ASCP 不使用直接营销流程或向任何海外方或组织披露个人或敏感信息。在审核活动过程中，雇员和承包商不时会收到未经请求的信息。未经请求的信息以与所有其他信息相同的方式安全保存，并遵循我们严格的数字和文档流程。

4.12. Quality of personal information 个人信息质量

ASCP will take reasonable steps to ensure that all personal information collected during business or audit activities is accurate, current and complete.ASCP 将采取合理措施确保在业务或审核活动中收集的所有个人信息准确、最新和完整。

In any exceptional circumstances requiring disclosure of personal or sensitive information, ASCP will ensure that all reasonable steps are taken to disclose the most current information that is available. This includes contacting the client or individual to obtain current information, as required.在任何需要披露个人或敏感信息的特殊情况下，ASCP 将确保采取一切合理步骤，披露可用的最新信息。这包括根据需要联系客户或个人以获取当前信息。

4.13. Requests for access to personal information 查阅个人资料的要求

ASCP is committed to open and transparent information management. As such we support any individual who requests access to any personal information held by our company.ASCP 致力于公开透明的信息管理。因此，我们支持任何要求访问我们公司持有的任何个人信息的个人。

ASCP has a process in place that ensures:ASCP 有一个适当的过程来确保：

- Requests can be made in person, by phone or in writing including email;可以亲自、电话或书面（包括电子邮件）提出请求；

- Each request is documented by the designated privacy officer;每项要求均由指定的隐私管理员存档；

- Each individual identity is verified by the privacy officer using current identity documents or persons responsible in specific cases;每个人的身份由私隐管理员在特定情况下使用当前身份证件或负责人核实；

- The privacy officer will control all information retrieval and will send all communications to the individual in their preferred manner;隐私管理员将控制所有信息检索，并将以个人喜欢的方式发送所有通信；

- The privacy officer will be responsible to maintain information confidentiality and security, 隐私管理员将负责维护信息的机密性和安全性。

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- Refusals will be governed by the criteria outlined in laws;拒绝将按照法律规定的标准进行；

- Without any violation of laws, all reasonable steps will be taken to meet the needs of the individual and of the company, including the use of an intermediary;在不违反任何法律的情况下，我们将采取一切合理的措施来满足个人和公司的需求，包括使用中介机构；

- Without any violation of laws, the individual will be contacted directly to seek other options to satisfy their request;在不违反任何法律的情况下，我们将直接联系个人，寻求其他选择来满足他们的要求；

- All requests will be responded to and responses will be in writing and signed by the Executive Manager;所有的请求都将以书面形式予以回应，并由执行经理签字；

- Any information contained in documents held that identify other persons or other non-relevant information will have that information deleted;文件中包含的任何识别其他人的信息或其他非相关信息将被删除；

- The process will take no more than 30 days;申请过程不超过 30 天；

- Where a person requests that their information be changed in any way the same process will be followed;如有人要求以任何方式更改其资料，是否会遵循相同的程序；

- The requesting individual will be given information on making an internal and external complaint about any decision made at the time of the request and in the formal response letter; and 提出要求的个人会在提出要求时就所作出的任何决定作出内部或外部投诉，并会在正式回应信中获得有关资料；和

- In any case of complaint an external mediator will be appointed to maintain impartiality. 在任何投诉情况下，将任命一名外部调解员保持公正性。

4.14. Reviews and revisions 评审和修订

ASCP reviews its Privacy Policy annually or as required by regulatory changes. ASCP also reserves the right to change its Privacy Policy at any time. Notifications about changes to this Privacy Policy will be emailed to all stakeholders.ASCP 每年或根据监管变化的要求审查其隐私政策。ASCP 还保留随时更改其隐私政策的权利。有关本隐私政策变更的通知将通过电子邮件发送给所有利益相关方。

Revision History 历史版本

Revision # 版本号	Effective date 生效日期	Section 章节	Change Description 变更的描述
A00	01/12/2020	All	Initial edition released.初次发布