

Zhongshan Huali Industrial Group Co., Ltd.

Privacy Policy

1. Policy Purpose

This policy aims to standardize all operational procedures, mitigate privacy breach risks, enhance management level, and strengthen the trust between customers, partners, and employees. It ensures uninterrupted business operations, safeguards lawful rights and interests of all stakeholders, and guarantees the privacy of information be protected throughout the collection, use, storage, processing, and transmission.

2. Scope of Application

This policy applies to all information involved in the business operations of Huali Group and its subsidiaries, including but not limited to customer data, employee records, partner information, supply chain details, business data, and technical materials.

3. Provision

3.1 Huali Group places high importance on privacy protection, clearly defining the responsibilities of all departments and employees while establishing a comprehensive privacy protection management system. The Group pledges to strictly comply with applicable laws and regulations in all countries and regions where it operates, adhere to industry best practices, and implement effective technical and administrative measures. Regular risk assessments and audits will be done to promptly addressing potential security vulnerabilities. Concurrently, the Group will enhance employee training to elevate security awareness, ensuring all privacy protection measures are implemented effectively.

3.2 Specific Privacy Protection Measures

To fulfill these commitments above, Huali Group will implement the following actions:

(1) Information Collection & Usage

Collect personal information lawfully, legitimately, and necessarily, with explicit disclosure of purpose, methods, and scope to data subjects, obtaining their informed consent.

Use personal information solely for legitimate business-related purposes, not for any other unauthorized applications.

(2) Information Storage & Protection

Implement stringent confidentiality measures to secure personal information during storage and usage.

Store personal data in secured environments with restricted access to prevent unauthorized breaches.

(3) Information Sharing & Disclosure

Refrain from sharing personal information with unauthorized third parties without data subject consent or legal mandate.

Require third-party partners to comply with our privacy policy and adopt equivalent confidentiality measures.

(4) Data Subject Rights Protection

Respect and uphold data subjects' rights, including access, correction, deletion, and decision-making authority over their personal information.

Provide accessible channels for data subject requests regarding access and corrections, ensuring timely disclosure of usage practices and associated risks.

Establish complaint and whistleblowing mechanisms to address unlawful data processing or technology ethics violations, guaranteeing prompt response and resolution.

(5) Cross-Border Data Transfer

For overseas data transfers, rigorously comply with jurisdictional laws, implementing necessary security measures to ensure legality and protection throughout transmission.

(6) Supply Chain Privacy Protection

Secure supply chain information through data encryption, access controls, regular security audits, and employee training.

Execute data protection agreements with partners to ensure mutual legal compliance.

(7) Customer Privacy Protection

Collect and use customer data lawfully, legitimately, and necessarily in strict compliance with regulations, implementing robust security measures to prevent unauthorized access or disclosure.

4. Communication & Reporting

We encourage all stakeholders to monitor policy compliance and report any violations. All reports will be handled confidentially, with zero tolerance for retaliation.

Group Grievance & Reporting Email: anti.corruption@huali-group.com