

## PRIVACY POLICY FOR CHINA

### 中国隐私政策

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us in the event you have a complaint. This Privacy Policy applies locally to Accuride Wheels (Shandong) Co., Ltd.

我们非常重视您的隐私。请仔细阅读本政策，政策包含我们是谁、我们如何以及为什么收集、存储、使用和分享您的个人信息。政策还解释了您在个人信息方面的权利，以及在您有投诉的情况下如何联系我们。本隐私政策适用于艾瑞德车轮（山东）有限公司全体员工。

We collect, use and are responsible for certain personal information about you. When we do so we are subject to various laws and regulations in the PRC.

我们收集、使用并负责您的某些个人信息。当我们这样做时，我们要遵守中国的法律和法规。

Under some circumstances, certain members of the Accuride Group (defined below) will also be responsible as “controller” of that personal information for the purposes of laws of the countries in which we do business, e.g. where you access to our international website and the services provided by Accuride Group and our affiliates outside of the PRC.

在某些情况下，就我们开展业务国家的法律而言，艾瑞德集团的某些成员（定义见下文）也将作为该个人信息的“控制者”承担责任，例如，当您访问我们的国际网站以及艾瑞德集团和我们在中国以外的关联公司提供的服务时。

#### 1. **Key Terms.** It would be helpful to start by explaining some key terms used in this policy:

关键术语。首先解释一下本政策中使用的一些关键术语：

We, us, our, Accuride 我们，艾瑞德	Accuride Wheels (Shandong) Co., Ltd. The contact information for us is: Hongyuan Industrial Park Kangtai Road High Technology Zone Jining City, Shandong Province 272000. 艾瑞德车轮（山东）有限公司 地址：山东省济宁市高新区康泰路宏源工业园
Accuride Group 艾瑞德集团	Accuride Corporation and our affiliates. The contact information for Accuride Corporation is found at this link : <a href="https://www accuridecorp.com/about-accuride/facilities-and-locations..">https://www accuridecorp.com/about-accuride/facilities-and-locations..</a>

	<p>艾瑞德公司和我们的关联公司。</p> <p>艾瑞德公司的联系信息可在此 <a href="https://www accuridecorp.com/about-accuride/facilities-and-locations">https://www accuridecorp.com/about-accuride/facilities-and-locations</a> 找到。</p>
<p>Our data protection officer 我们的数据保护人员</p>	<p>The data protection officer may be contacted at the following email address: <a href="mailto:privacy@accuridecorp.de">privacy@accuridecorp.de</a>.</p> <p>可以通过以下电子邮件地址联系数据保护人员： privacy@accuridecorp.de</p>
<p>Personal information 个人信息</p>	<p>Any information relating to an identified or identifiable individual as electronically or otherwise recorded, excluding any information that has been anonymized.</p> <p>以电子方式或其他方式记录的与已识别或可识别的个人有关的任何信息，不包括任何已被匿名的信息。</p>
<p>PRC 中国</p>	<p>The People's Republic of China, for the purpose of this privacy policy, excluding Hong Kong, Macau and Taiwan.</p> <p>中华人民共和国，就本隐私政策而言，不包括香港、澳门和台湾。</p>

2. **Personal Information We Collect About You.** We may collect and use the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

我们收集的关于您的个人信息。我们可能会收集和使用以下可识别、涉及、描述、有理由与之相关联或可合理地直接或间接与某一特定用户或家庭联系的个人信息。

## 2.1 Use of Our Website

### 使用我们的网站

Please note our international website ([www accuridecorp.com](http://www accuridecorp.com), "our website") is operated by Accuride Corporation outside of the PRC. We will need to comply with laws and regulations of the countries where our website is operated.

请注意我们的国际网站 ([www accuridecorp.com](http://www accuridecorp.com), "我们的网站") 是由艾瑞德公司在中国境外运营的。我们需要遵守我们网站运营所在国家的法律和法规。

If you use our website, we process your personal information as follows:

如果您使用我们的网站，我们会按以下方式处理您的个人信息。

## **a. Calling up our website / access data**

### **调用我们的网站/访问数据**

Each time you use our website, we collect the access data that your browser automatically transmits to enable you to visit the website. The access data includes in particular:

每次您使用我们的网站时，我们都会收集您的浏览器自动传输的访问数据，以便您能够访问网站。这些访问数据包括：

- IP address of the requesting device,  
请求设备的 IP 地址
- Date and time of the request,  
请求的日期和时间
- Address of the accessed website and the requesting website,  
被访问网站和请求网站的地址
- Information about the browser and operating system used,  
关于所使用的浏览器和操作系统的信息
- Online identifiers (e.g. device identifiers, session IDs).  
在线标识符（例如，设备标识符、会话标识符）

The data processing of this access data is absolutely necessary to enable the visit of the website, to ensure the permanent operability and security of our systems as well as for the general administrative maintenance of our website. The access data is also temporarily stored in internal log files for the purposes described above, for example in order to find the cause of repeated or criminal calls that endanger the stability and security of our website and to take action against them.

为了能够访问网站，对这些访问数据的处理是非常必要的，这样可以确保我们系统的永久可操作性和安全性，以及对我们的网站的管理维护。为了达到上述目的，访问数据也会暂时保存在内部日志文件中，例如，为了找出危及网站稳定性和安全性的重复原因或刑事调用，并对其采取行动。

## **b. Making Contact**

### **进行联络**

You have various options for contacting us. These include our contact form. In this context, we process data exclusively for the purpose of communicating with you.

您有多种方式与我们联系。包括我们的联系表格。在这种情况下，我们处理数据的目的是为了与您沟通。

We only use your personal information for marketing and promotional purposes (such as sending you promotional materials or contacting you by telephone for promotional purposes)

if you have given your respective informed consent. If you are not an existing customer, we will also only send you promotional e-mails on the basis of your consent.

我们仅在您知情同意的情况下，将您的个人信息用于推广和宣传（如向您发送推广材料或为推广目的与您电话联系）。如果您不是现有客户，我们也只会您在您同意的基础上向您发送推广邮件。

The data we collect when you contact us will be automatically deleted after we have fully processed your request, unless we still need your request to fulfil contractual or legal obligations.

当您与我们联系时，我们收集的数据将在我们完全处理完您的请求后自动删除，除非我们仍然需要您的请求来履行合同或法律义务。

### **c. Use of Cookies and Similar Technologies**

#### **使用缓存和类似的技术**

This website uses cookies and similar technologies (collectively, "Tools") provided either by us or by third parties.

本网站使用由我们或第三方提供的缓存和类似的技术（统称为"工具"）。

A cookie is a small text file that is stored on your device by the browser. Cookies are not used to run programs or download viruses onto your computer. Comparable technologies are in particular web storage (local / session storage), fingerprints, tags or pixels. Most browsers are set by default to accept cookies and similar technologies. However, you can usually adjust your browser settings so that cookies or similar technologies are rejected or only stored with your prior consent. If you refuse cookies or similar technologies, not all of our offers may function properly for you.

缓存是小文本文件，由浏览器存储在您的设备上。缓存不用于运行程序或向您的计算机下载病毒。类似的技术指的是网络存储（本地/会话存储）、指纹、标签或像素。大多数浏览器默认为接受缓存和类似的技术。然而，您通常可以调整您的浏览器设置，以便拒绝接受或仅在您事先同意的情况下储存缓存或类似的技术。如果您拒绝接受缓存或类似的技术，我们的所有服务可能无法为您正常运行。

In the following, we list the tools we use by category, informing you in particular about the providers of the tools, the storage period of the cookies and the transfer of data to third parties. In addition, we explain in which cases we obtain your voluntary consent to use the tools and how you can revoke this consent.

在下文中，我们按类别列出了我们使用的工具，并特别告知您这些工具的提供者、缓存的储存期以及向第三方传输数据的情况。此外，我们还解释了在哪些情况下我们获得了您对这些工具的同意，以及您如何撤销这种同意。

Should - even despite the greatest care - the information in the cookie banner contradict that in this data protection declaration, the information in this data protection declaration shall take precedence.

如果--即使是最谨慎的情况下--缓存横幅上的信息与本数据保护声明中的信息相矛盾，本数据保护声明中的信息将被优先考虑。

To the extent personal data is transferred to third countries, please refer to the below section 9. (“Transferring Your Personal Information Out of the Country of Origin”), also with regard to the possible associated risks. We will inform you if we have concluded standard contractual clauses or other guarantees with the providers of certain tools. If you have given your consent to the use of certain tools, we will (also) transfer the data processed when using the tools to third countries on the basis of this consent.

在个人数据被转移到第三方国家的情况下，请参考以下第 9 节。（“将您的个人信息转移到原籍国之外”），同时也考虑到可能的相关风险。如果我们与某些工具的供应商签订了标准的合同条款或其他保证，我们会通知您。如果您已经同意使用某些工具，我们将（也）在此同意的基础上将使用这些工具时处理的数据转移到第三方国家。

#### **i. Obtaining of Your Consent**

##### **获得您的同意**

We use [Drupal](#) to obtain and manage your consent. Drupal generates a banner informing you about data processing on our website and giving you the option to consent to all, some or no data processing through optional tools. This banner will appear the first time you visit our website and when you revisit to change your choices or withdraw consent. The banner will also appear on subsequent visits to our website if you have deactivated the storage of cookies or if the cookies or information in our local storage have been deleted or have expired.

我们使用 Drupal 来获取和管理您的同意。Drupal 会生成一个横幅，告知您我们网站上的数据处理情况，并让您选择是否同意通过可选工具进行全部、部分或不进行数据处理。这个横幅会在您第一次访问我们的网站时出现，并且在您再次访问时改变您的选择或撤回同意。如果您取消了缓存的存储，或者我们本地存储的缓存或信息已经被删除或过期，该横幅也会在您随后访问我们网站时出现。

#### **ii. Withdrawal of Your Consent:**

##### **撤回您的同意：**

**You can revoke your consent for certain tools at any time. To do so, click on the “Privacy Settings” tab at the bottom of the [Accuridecorp.com](#) homepage. There you can also change the selection of the tools you wish to consent to using, as well as obtain additional information on the cookies and the respective storage period. Alternatively, you can assert your revocation for certain tools directly with the respective provider.**

**您可以随时撤销对某些工具的同意。为此，请单击 [Accuridecorp.com](#) 主页底部的“隐私设置”选项卡。**

**在那里，您还可以更改您希望同意使用的工具的选择，以及获取有关cookie和相应存储期的其他信息。或者，您可以直接向相应的提供商断言某些工具的吊销。**

#### **iii. Necessary tools**

##### **必要的工具**

We use certain tools to enable the basic functions of our website (“necessary tools”). Without these tools, we could not provide our service. Therefore, necessary tools are used without consent based on our legitimate interests pursuant to applicable law. The reading and storing of information on your personal device are necessary for us to provide you with the requested online service and in pursuance with applicable law.

我们使用某些工具来实现我们网站的基本功能 (“必要工具”)。没有这些工具, 我们就无法提供服务。因此, 必要工具的使用是基于我们在适用法律下的合法利益, 无需同意。读取和存储您个人设备上的信息对于我们向您提供所要求的在线服务和遵守适用法律是必要的。

- **Our Own Cookies**

- 我们自己的缓存**

- We use our own necessary cookies in particular

- 我们使用自己必要的缓存, 特别是

- to save your language settings,  
保存您的语言设置
    - to indicate that information placed on our website has been displayed to you - so that it will not be displayed again the next time you visit the website.  
表明放在我们网站上的信息已经显示给您。这样, 在您下次访问网站时就不会再显示了

- **Google Tag Manager**

- 谷歌跟踪管理器

- This section is not applicable to users in the PRC, however it will become relevant if you travel or relocate to the countries/regions mentioned immediately below.

- 本节不适用于中国用户, 但如果您旅行或迁居到下面提到的国家/地区, 将会相关本节内容。

- Our website uses Google Tag Manager, a service provided for users from the European Economic Area and Switzerland by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland and for all other users by Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043, USA (together “Google”).

- 我们的网站使用谷歌跟踪管理器, 这项服务由谷歌爱尔兰有限公司提供给来自欧洲经济区和瑞士的用户, 地址是 Gordon House, Barrow Street, Dublin 4, Ireland, 由谷歌有限责任公司提供给所有其他用户, 地址是 1600 Amphitheatre Parkway Mountain View, CA 94043, USA (合称 “谷歌”)。

- The Google Tag Manager is used exclusively to manage website tools by integrating so-called website tags. A tag is an element that is stored in the source code of our website in order to execute a tool, for example through scripts. If these are optional tools, they will only be integrated by the Google Tag Manager with your consent.

- 谷歌跟踪管理器专门用于通过整合所谓的网站标签来管理网站工具。标签是一个存储在我们网站源代码中的元素, 以便执行一个工具, 例如通过脚本。如果这些是可选的工具, 只有在您同意的情况下才会由谷歌跟踪管理器整合。

- Google Tag Manager sets the following cookies for technical debugging purposes: “\_ga”, “\_gid”, and “\_gat”.

谷歌跟踪管理器为技术调试目的设置以下缓存: "\_ga"、"\_gid"和"\_gat"。

It is based on our legitimate interest to integrate and manage multiple tags in an uncomplicated way on our website under applicable law.

这是基于我们的合法利益, 根据适用的法律, 在我们的网站上以一种不复杂的方式整合和管理多个标签。

For the purpose of ensuring stability and functionality, Google collects information on which tags are integrated by our website within the framework of the use of the Google Tag Manager, but in principle no personal data, in particular no data on user behaviour, the IP address or the pages visited.

为了确保稳定性和功能性, 谷歌在使用跟踪管理器的框架内收集关于我们网站集成的标签的信息, 但原则上没有个人数据, 特别是没有关于用户行为、IP 地址或访问页面的数据。

We have concluded an order processing agreement with Google. In the event that personal data is transferred to the USA or other third countries, we have concluded standard contractual clauses with Google pursuant to applicable law. For further information, please refer to section 9. ("Transferring Your Personal Information Out of the Country of Origin").

我们已经与谷歌签订了一份订单处理协议。如果个人数据被转移到美国或其他第三国, 我们已经根据适用法律与谷歌签订了标准合同条款。更多信息, 请参考第 9 节("将您的个人信息转移到原籍国之外")。

[For more information, see Google's information on TagManager.](#)

欲了解更多信息, 请参阅谷歌关于跟踪管理器的信息。

#### **iv. Analysis tools**

##### **分析工具**

In order to improve our website, we use tools for the statistical collection and analysis of general usage behaviour based on access data ("analysis tools"). We also use analytics services to evaluate the use of our various marketing channels.

为了改进我们的网站, 我们使用了基于访问数据的一般使用行为的统计收集和分析工具("分析工具")。我们还使用分析服务来评估我们各种营销渠道的使用情况。

Unless otherwise stated - your consent is required under applicable law. For the revocation of your consent, please see the above section "Revoking your consent or changing your selection". In the event that personal data is transferred to the USA or other third countries, your consent expressly extends to the transfer of data. Please refer to section 9. ("Transferring Your Personal Information Out of the Country of Origin") for the associated risks. We only read and store information on your personal device with your informed and explicit consent and in pursuance with applicable law.

除非另有说明--根据适用的法律, 您的同意是必须的。关于撤销您的同意, 请参见上述 "撤销您的同意或改变您的选择" 部分。在个人数据被转移到美国或其他第三方国家的情况下, 您的同意明确延伸到数据的转移。请参考第 9 节("将您的个人信息转移到原籍国之外")

了解相关风险。我们只在您知情和明确同意的情况下，并根据适用法律，读取和存储您个人设备上的信息。

- **Google Analytics**

### 谷歌分析

This section is not applicable to users in the PRC, however it will become relevant if you travel or relocate to the countries/regions mentioned immediately below.

本节不适用于中国的用户，但如果您旅行或迁居到下面提到的国家/地区，本节将变得相关。

Our website uses Google Analytics, which for users from Europe, the Middle East and Africa (EMEA) is provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland and for all other users is provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (collectively “Google”).

我们的网站使用谷歌分析，对于来自欧洲、中东和非洲（EMEA）的用户，谷歌爱尔兰有限公司提供，地址是 Gordon House, Barrow Street, Dublin 4, Ireland；对于所有其他用户，谷歌公司提供，地址是 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA（统称“谷歌”）

Google Analytics uses cookies and similar technologies to analyse and improve our website based on your user behavior. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. The data accruing in this context may be transferred by Google to a server in the USA for evaluation and stored there. Please refer to section 9. (“Transferring Your Personal Information Out of the Country of Origin”) for the associated risks.

谷歌分析使用缓存和类似的技术，根据您的用户行为分析和改进我们的网站。谷歌将利用这些信息来评估您对网站的使用情况，为网站运营商编制网站活动报告，并提供与网站活动和互联网使用有关的其他服务。在这种情况下产生的数据可能会被谷歌传输到美国的一个服务器进行评估，并储存在那里。请参考第 9 节。（“将您的个人信息转移到原籍国之外”）了解相关风险。

We have made the following privacy settings for Google Analytics:

我们对谷歌分析进行了以下隐私设置。

- IP anonymization (shortening of the IP address before evaluation, so that no conclusions can be drawn about your identity)

IP 匿名化（在评估前缩短 IP 地址，因此不能对您的身份得出任何结论）

- Automatic deletion of old logs / limitation of storage time



自动删除旧日志/限制存储时间

- **Disabled Remarketing**  
禁用再营销
- **Disabled User-ID Policy**  
禁用用户身份政策

The following data is processed by Google Analytics:

以下数据是由谷歌分析处理的:

- **Anonymized IP address**  
匿名的 IP 地址
- **Referrer URL (previously visited page)**  
推荐者 URL (以前访问过的页面)
- **Pages viewed (date, time, URL, title, length of stay)**  
浏览的页面 (日期、时间、URL、标题、停留时间)
- **Downloaded files**  
下载的文件
- **Clicked links to other websites**  
点击到其他网站的链接
- **If applicable, achievement of certain goals (conversions)**  
如果适用, 某些目标的实现 (转换)
- **Technical Information: Operating system; browser type, version and language; device type, brand, model and resolution.**  
技术信息: 操作系统、浏览器类型、版本和语言; 设备类型、品牌、型号和分辨率
- **Approximate location (country and city, if applicable, based on anonymized IP address)**  
大致位置 (国家和城市, 如果适用, 基于匿名的 IP 地址)

Google Analytics sets the following cookies for the specified purpose with the respective storage period:

谷歌分析为指定的目的设置了以下缓存, 并规定了相应的存储期限。

- **"\_ga" for 2 years and "\_gid" for 24 hours (both used to recognize and distinguish website visitors by user ID);**  
"\_ga"为 2 年, "\_gid"为 24 小时 (均用于按用户 ID 识别和区分网站访问者)
- **"\_gat" for 1 minute (to reduce requests to Google servers);**  
"\_gat"为 1 分钟 (以减少对谷歌服务器的请求)

We have concluded an order processing agreement with Google for the use of Google Analytics as well as standard contractual clauses in the event that personal data is transferred to the USA or other third countries. Please refer to section 9. ("Transferring Your Personal Information Out of the Country of Origin") for the associated risks.

我们已经与谷歌签订了一份关于使用谷歌分析的订单处理协议, 以及在个人数据被转移到美国或其他第三方国家时的标准合同条款。请参阅第 9 节。("将您的个人信息转移到原籍国之外") 了解相关风险。

You can find more information about this in Google's privacy policy.  
您可以在谷歌的隐私政策中找到更多相关信息。

## **2.2 Processing Data of Our Business Partners**

### **处理我们商业伙伴的数据**

If you work with one of our business partners and act as our contact person, we may process the following of your personal information:

如果您作为联系人与我们的业务伙伴合作，我们可能会处理您的以下个人信息。

- your master data (name, title, employer, postal business address, business email address and phone number);  
您的主数据（姓名、职位、工作单位、邮寄地址、商务电子邮件地址和电话号码）
- your signature and signing dates on business documents (esp. on contracts); and-  
您在商业文件（尤其是合同）上的签名和签署日期；以及
- other commercial information necessarily required, if any.  
其他必要的商业信息，如果有的话。

The purpose of the processing of this data is the initiation and fulfillment of contracts between us and your enterprise as our customer as well as the performance of obligations and assertion of rights under such contracts. Also, we may process your abovementioned personal data for operational reasons, such as improving efficiency, training and quality control in our business operations, to administrate warranty and deliver important product information. In some cases, we may also process your personal information in anonymized form in order to perform statistical analysis to help us manage our business, e.g. in relation to customer base, product range or other efficiency measures.

处理这些数据的目的是为了启动和履行我们与客户之间的合同，以及履行这些合同规定的义务和权利。同时，我们也可能出于业务上的原因处理您的上述个人数据，如提高业务运作的效率、培训和质量控制，管理保修和传递重要的产品信息。在某些情况下，我们也可能以匿名形式处理您的个人信息，以便进行统计分析，帮助我们管理业务，例如与客户群、产品范围或其他效率措施有关的分析。

You are not legally or contractually obligated to provide your personal information as set out above. However, if you choose not to provide your personal information for processing as described above, this may impede our ability to conclude and fulfill contracts with your enterprise as our customer or to perform any obligations we may have thereunder.

您在法律或合同上没有义务提供您的个人信息，如上所述。但是，如果您选择不提供您的个人信息进行上述处理，就可能会妨碍我们与客户签订和履行合同，妨碍履行我们在其中可能承担的义务。

## **2.3 Processing Data of Job Applicants**

### **处理求职者的数据**

You can apply with us for open job positions via a number of different channels, such as, for example, our applicant management system. For some channels (such as, for example, our applicant management system) operated by Accuride Corporation or other affiliates outside of the PRC, we will need to comply with laws and regulations of the countries where such channels are operated.

您可以通过一些不同的渠道向我们申请公开的工作职位，例如，我们的申请人管理系统。对于一些由艾瑞德公司或中国以外的其他关联公司运营的渠道（例如，我们的申请人管理系统），我们需要遵守这些渠道所在国家的法律法规。

The purpose of collection of your personal information in this respect is the selection of applicants for the possible establishment of an employment relationship and the aptitude of the particular job applicant for the respective job.

在这方面，收集您个人信息的目的是为了选择可能建立雇用关系的申请人，选择特定求职者对各自工作的能力。

For the receipt and processing of your application, we collect such personal information on you as stated and requested in the respective job offering or as provided by you. Such personal information may include, without limitation, the following data in particular: First name and surname, date of birth, application portraits, contacting information (such as postal address, e-mail address, telephone number), application documents (e.g. certificates, resume, CV, further professional and employment related information as well as, all as stated, Education information, defined as information that is not publicly available personally identifiable information as defined under applicable law), date of earliest possible employment and salary expectations.

为了接收和处理您的申请，我们会收集您在相关招聘信息中所述和要求的或由您提供的个人信息。这些个人信息可能包括，但不限于以下数据：名字、出生日期、肖像照片、联系信息（如邮寄地址、电子邮件地址、电话号码）、申请文件（如证书、简历、专业和就业相关的信息以及所有所述的教育信息，定义为适用法律规定的不公开的个人信息）、入职日期和期望薪资。

You are not legally or contractually obligated to provide your personal information as set out above. However, if you choose not to provide your personal information for processing as described above, we may not be able to consider your application for a particular job offer you may be interested in.

您在法律上或合同上没有义务提供您的个人信息，如上所述。然而，如果您选择不提供您的个人信息进行上述处理，我们可能无法考虑您对您可能感兴趣的特定工作机会的申请。

### **3. How Your Personal Information is Collected.**

您的个人信息是如何收集的。

We collect most of this personal information directly from you—in person, by telephone, text or email or via our website and business applications. However, we may also collect information:

我们直接从您那里收集这些个人信息 -- 通过电话、短信或电子邮件，或通过我们的网站和商业应用程序。然而，我们也可能这样收集您的信息：

- From a third party with your explicit and respective informed consent ; or  
经您明确和各自的知情同意，来自第三方；或
- From cookies on our website.  
来自我们网站上的缓存

**4. How and Why We Use Your Personal Information.** Under applicable law, we can only process your personal information if we have a proper reason for doing so, e.g.:

我们如何以及为何使用您的个人信息。根据适用的法律，我们只能在有适当理由的情况下处理您的个人信息，例如：

- To comply with our legal and regulatory obligations;  
为了遵守我们的法律和监管义务
- For the performance of our contract with you or to take steps at your request before entering into a contract;  
为了履行我们与您的合同或在签订合同前应您的要求采取措施
- For our legitimate interests or those of a third party; or  
为了我们或第三方的合法利益；或
- Where you have given consent.  
在您已经同意的情况下

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

合法利益是指我们有业务或商业理由使用您的信息，只要您的权益不受影响。

Section 2 above explains what we use (process) your personal information for and our reasons for doing so.

上述第 2 条解释了我们使用（处理）您的个人信息的目的以及我们这样做的原因。

Section 2 above does not apply to special category personal information/sensitive personal information, which we will only process if and to the extent permitted by applicable law and – where required – on the basis of your prior, express and respective consent.

上述第 2 条不适用于特殊类别的个人信息/敏感个人信息，我们只有在适用法律允许的范围内，并在需要时，在您事先明确和各自同意的基础上，才会处理这些信息。

**5. Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone or post) about our products or services, including exclusive offers, promotions or new products or services. Where consent is required under applicable law, we will ask for this consent separately and clearly.

**推广沟通。**我们可能使用您的个人信息向您发送有关我们产品或服务的最新信息（通过电子邮件、短信、电话或邮寄），包括独家报价、推广活动、新产品或服务。在适用法律要求同意的情况下，我们会单独和明确地征求这一同意。

We will always treat your personal information with the utmost respect and never sell or share it with other organizations outside the Accuride Group for marketing purposes.

我们将始终以最大的尊重对待您的个人信息，绝不会出于营销目的向艾瑞德集团以外的其他组织出售或分享这些信息。

**You have the right to opt out of or, as applicable, withdraw your consent to receiving promotional communications at any time by:**

您有权在任何时候通过以下方式选择退出或（如适用）撤回您对接收推广信息的同意：

- **Contacting us at <https://www accuridecorp.com/contact>; or**  
与我们联系，<https://www accuridecorp.com/contact>；或
- **Using the “unsubscribe” link in emails.**  
使用电子邮件中的“取消订阅”链接。

Any withdrawal of your consent shall not affect the lawfulness of processing of your data based on such consent before its withdrawal.

撤销您的同意不应影响在撤销前基于这种同意对您的数据进行处理合法性。

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products or services in the future, or if there are changes in the law, regulation, or the structure of our business.

如果您指示我们在未来提供进一步的产品或服务，或者如果法律、法规或我们的业务结构发生变化，我们可能要求您确认或更新您的市场偏好。

## **6. Who We Share Your Personal Information With.**

我们与谁分享您的个人信息

We only disclose or transfer your personal information if and to the extent this is permissible under applicable law. Under applicable PRC law, this may – in particular – be the case, if you have given your respective express and informed consent.

我们仅在适用法律允许的范围内披露或转让您的个人信息。根据适用的中国法律，特别是在您明确表示了知情同意的情况下，才可以这样做。

Subject to your consent described above, we routinely share personal information with such of our partners, suppliers and service providers that are mentioned in this privacy policy as well as with the following recipients:

根据您的上述同意，我们经常与本隐私政策中提到的我们的合作伙伴、供应商和服务提供商以及以下接收方分享个人信息：

- **Our affiliates, including companies within the Accuride Group;**  
我们的关联公司，包括艾瑞德集团内的公司
- **Service providers we use to help deliver our products or services to you, such as payment service providers, warehouses and delivery companies;**  
我们用来帮助向您提供我们的产品或服务的供应商，如支付服务供应商、仓库和送货公司。
- **Other third parties we use to help us run our business, such as marketing agencies or website hosts or website analytics providers, including platform.sh for the hosting of our website as well as the other service providers that are mentioned in this privacy policy;**  
我们用于帮助我们经营业务的其他第三方，如营销机构、网站主机或网站分析供应商，包括用于托管我们网站的 platform.sh 以及本隐私政策中提到的其他服务供应商。
- **Third parties approved by you, including social media sites you choose to link your account to or third-party payment providers;**  
经您批准的第三方，包括您选择将您的账户链接到的社交媒体网站或第三方支付的供应商。
- **Hosted application providers to maintain appropriate details for business transactions.**  
托管的应用程序供应商，以维护商业交易的适当细节。

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers to ensure they can only use your personal information to provide services to us and to you. We may also share personal information with external auditors.

我们只允许我们的服务供应商处理您的个人信息，前提是我们确信他们采取了适当的措施来保护您的个人信息。我们还对服务供应商规定了合同义务，确保他们只能将您的个人信息用于向我们和您提供服务。我们也可能与外部审计人员分享个人信息。

To the extent permissible under applicable data privacy law, we may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

在适用的数据隐私法允许的范围内，我们可以与执法机构和监管机构披露和交换信息，以遵守我们的法律和监管义务。

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring, provided that such disclosure of personal data is allowed by applicable data privacy law. We will typically anonymize

information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

我们也可能需要与其他方分享一些个人信息，例如我们部分或全部业务的潜在买家，或在重组期间，适用的数据隐私法允许披露的个人数据。我们通常会对信息进行匿名处理，但这可能并不总是可行。信息的接收者将受到保密义务的约束。

## **7. Where Your Personal Information is Held.**

您的个人信息的保存地点。

In principle, personal information collected and generated by us in the PRC will be stored in the PRC in accordance with the requirements of the applicable law. Information shall be held at our offices in the PRC.

原则上，我们在中国收集和产生的个人信息将根据适用法律的要求存储在中国。信息将被保存在我们在中国的办公室。

However, as a multinational company, the Accuride Group manages its business and human resources at group level and for this purpose, we may transfer some personal information of you to Accuride Corporation and other affiliates in the Accuride Group. We may also share your personal information with third party agencies, service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information with").

然而，作为一家跨国公司，艾瑞德集团在集团层面上管理其业务和人力资源，因此，我们可能会将您的一些个人信息传递给艾瑞德公司和艾瑞德集团的其他关联公司。我们还可能与上述的第三方机构、服务供应商、代表和代理人分享您的个人信息（见上文："我们与谁分享您的个人信息"）。

Some of these third parties may be based outside the PRC. For more information, including on how we safeguard your personal information when this occurs, see below: "Transferring Your Personal Information Out of Country of Origin".

其中一些第三方可能设在中国境外。欲了解更多信息，包括在发生这种情况时我们如何保护您的个人信息，请参见下文。"将您的个人信息转移到原籍国之外"。

## **8. How Long Your Personal Information Will Be Kept.**

您的个人信息保存时间

We will keep your personal information while we are providing products or services to you. Thereafter, we will keep your personal information for as long as is legally allowed and necessary to pursue the respective purposes for which your data has been processed, in particular (without limitation):

在我们向您提供产品或服务时，我们会保存您的个人信息。此后，我们将在法律允许和必要的范围内保存您的个人信息，以实现处理您数据的目的，特别是（但不限于）：

- To respond to any questions, complaints or claims made by you or on your behalf;  
对您或代表您提出的任何问题、投诉或索赔作出回应
- To show that we treated you fairly; or-  
表明我们公平对待您；或
- To keep records required by law.  
保存法律要求的记录。

## 9. Transferring Your Personal Information Out of the Country of Origin.

将您的个人信息转移到原籍国以外的地方

To deliver services to you, it is sometimes necessary for us to share your personal information outside the country of origin, including outside the PRC, e.g.:

为了向您提供服务，我们有时需要在原籍国之外分享您的个人信息，包括在中国之外，例如：

- With offices of Accuride Group members outside the country of origin;  
与艾瑞德集团成员在原籍国以外的办事处
- With your and our service providers located outside the country of origin;  
与您和我们位于原籍国以外的服务供应商
- If you are based outside the country of origin; or  
如果您的总部在原籍国之外；或
- Where there is an international dimension to the services we are providing to you.  
当我们向您提供的服务涉及到国际层面时

These transfers are subject to special rules under PRC data protection law.

这些转让须遵守中国数据保护法的特殊规则。

Countries to which such information may be transferred do not have the same data protection laws as the PRC. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. We will seek your explicit and respective informed consent, as well as execute the model contract being formulated by the PRC authorities with the overseas recipients, and adopt adequate additional technical measures to protect your personal information. We shall employ our standard data protection contract clauses until a model contract is available. To obtain a copy of those clauses, or if you would like further information, please contact our Data Protection Officer (see “How To Contact Us” below).



这些信息被转移到的国家可能没有与中国相同的数据保护法。然而，我们将确保数据转移符合数据保护法，所有的个人信息将是安全的。我们将征求您的明确同意，以及执行中国当局与海外接收方正在制定的合同范本，并采取适当的额外技术措施来保护您的个人信息。在合同范本出台之前，我们将采用我们的标准数据保护合同条款。要获得这些条款的副本，或者如果您想了解更多信息，请联系我们的数据保护人员（见下文“如何联系我们”）。

We will seek your separate informed consent where it is not possible to achieve adequate protection of your data by means of suitable contractual, organizational and technical measures.

如果无法通过适当的合同、组织和技术措施实现对您的数据的充分保护，我们将寻求您的同意。

## 10. Your Rights Under the PRC Law.

您在中国法律下的权利

Right to Access 访问权	The right to be provided with a copy of your personal information (the right of access) 有权获得一份您的个人信息的副本（访问权）。
Right to Rectification 纠正权	The right to require us to correct any mistakes in your personal information or to supplement incomplete personal data 有权要求我们纠正您的个人信息中的任何错误或补充不完整的个人数据
Right to be Forgotten 被遗忘的权利	The right to require us to delete your personal information 有权要求我们删除您的个人信息
Right to Data Portability 数据移植权	The right to receive the personal information you provided to us, and/or transmit that data to a designated third party 有权接收您提供给我们的个人信息，和/或将该数据传送给指定的第三方
<b>Right to Object</b> 反对权	<b>The right to object to your personal information being processed.</b> 有权反对对您的个人信息进行处理。
<b>Right to Withdraw your Consent</b> 撤销同意权	<b>The right to withdraw your consent you may have previously given with respect to the processing of your data by us; the withdrawal of your consent shall not affect</b>

	<p><b>the lawfulness of processing based on consent before its withdrawal.</b></p> <p>您有权撤销您之前对我们处理您的数据所给予的同意；撤销您的同意不应影响在撤销之前基于同意的处理的合法性。</p>
<p>Right Not to be Subject to Automated Individual Decision-Making</p> <p>不受个人自动决策影响的权利</p>	<p>The right to seek explanation on an automated decision that significantly affects your interest; and the right to reject a decision based solely on automated processing</p> <p>有权要求对严重影响您利益的自动决定进行解释；有权拒绝完全基于自动处理的决定。</p>

## 11. Keeping Your Personal Information Secure.

保证您的个人信息安全。

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

我们采取了适当的安全措施，以防止个人信息意外丢失或被使用，或以未经授权的方式被访问。我们将对您的个人信息的访问，限制在有真正业务需要的人。那些处理您信息的人将只以授权的方式进行处理，并负有保密的责任。在法律要求的情况下，我们将向您和任何适用的监管机构通报可疑的数据安全漏洞。

## 12. How to Exercise Your Rights.

如何行使您的权利

If you would like to exercise any of your rights as described in this Privacy Policy, please:

如果您想行使本隐私政策中所述的任何权利，请：

- Complete a data subject request form available on our website at <https://www accuridecorp.com/contact>

填写我们网站上的数据主体请求表：<https://www accuridecorp.com/contact>

- Call us at +86 537 2481 2778; or  
给我们打电话，+86 537 2481 2778；或
- Email/write to us at the following:  
通过电子邮件/写信给我们，联系方式如下。

- Email:  
电子邮件
  - [privacy@accuridecorp.cn](mailto:privacy@accuridecorp.cn)
- Postal Mail  
邮寄
  - Accuride Wheels (Shandong) Co., Ltd – Attn: Privacy Representative  
Hongyuan Industrial Park Kangtai Road  
High Technology Zone  
Jining City, Shandong Province 272000.  
山东省济宁市高新区康泰路宏源工业园区，艾瑞德车轮（山东）有限公司，总经办收

If you choose to contact directly by any method (i.e. website/email/phone/in writing), you will need to provide us with:

如果您选择以任何方式（即网站/电子邮件/电话/书面形式）直接联系，您需要向我们提供：

- Enough information to identify you (e.g., your full name, address and customer or matter reference number);  
足够的信息来识别您的身份（例如，您的全名、地址和客户或重要参考号码）。
- Proof of your identity and address (e.g., a copy of your identity card or passport); and  
您的身份和地址证明（例如，您的身份证或护照的复印件）；以及
- A description of what right you want to exercise and the information to which your request relates.  
说明您想行使的权利以及您的请求所涉及的信息。

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.

如果我们不能核实提出请求的人是我们收集信息的对象，或者是被授权代表该人行事的人，我们没有义务进行数据访问或数据移植披露。

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

我们为核实您的身份而向您收集的任何个人信息将仅用于核实的目的。

### 13. How to File a Complaint.

如何进行投诉

We hope that we or our Data Protection Officer can resolve any query or concern you raise about our use of your information. The applicable PRC law also gives you right to lodge a complaint with a governmental authority that is in charge of personal information protection.

我们希望我们或我们的数据保护人员能够解决您对我们使用您的信息提出的任何疑问或关切。适用的中国法律还赋予您向负责个人信息保护的政府机构提出投诉的权利。

#### **14. Changes to This Privacy Notice.**

本隐私通知的变更

This privacy notice was published on March 25, 2022 and last updated on March 25, 2022. We may change this privacy notice from time to time—when we do, we will inform you via our website.

本隐私声明发布于 25.3.2022，最后更新于 25.3.2022。我们可能会不时地改变本隐私声明，当我们这样做时，我们将通过我们的网站通知您。

#### **15. How to Contact Us.**

如何联系我们

Please contact us or our Data Protection Officer by postal mail, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are set forth in Section 12.

如果您对本隐私政策或我们持有的您的信息有任何疑问，请通过邮寄、电子邮件或电话联系 我们或我们的数据保护人员。我们的联系方式在第 12 节。

#### **16. Do You Need Extra Help?**

您需要额外的帮助吗？

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see “How to contact us” above).

如果您需要本通知的其他格式（例如：音频、大字体、盲文），请联系我们（见上文“如何联系我们”）。