

## 天虹国际集团有限公司客户隐私政策

### Texhong International Group Limited Customer Privacy Policy

#### 一、政策目的

天虹国际集团有限公司（以下简称“天虹国际”、“我们”或“本集团”）高度重视客户个人数据的保护与隐私安全。本《客户隐私政策》（以下简称“本政策”）旨在向您清晰说明我们在收集、处理、存储、使用及共享您的个人信息时的具体规则，以履行 ESG 报告框架下“产品责任”层面关于客户信息保护的关键披露义务。我们严格遵守运营所在地适用的法律法规，包括但不限于《中华人民共和国个人信息保护法》《中华人民共和国数据安全法》《中华人民共和国网络安全法》、香港《个人资料（私隐）条例》、欧盟《通用数据保护条例》（GDPR）及越南《个人数据保护法》等。

#### 1. Policy Purpose

Texhong International Group Limited (hereinafter referred to as "Texhong International", "we", "us" or "the Group") attaches great importance to the protection of customer personal data and privacy security. This Customer Privacy Policy (hereinafter referred to as "this Policy") aims to clearly explain to you the specific rules regarding how we collect, process, store, use and share your personal information, thereby fulfilling the key disclosure obligation concerning customer information protection under the "Product Responsibility" aspect of our ESG reporting framework. We strictly comply with applicable laws and regulations in the jurisdictions where we operate, including but not limited to the Personal Information Protection Law of the People's Republic of China, the Data Security Law of the People's Republic of China, the Cybersecurity Law of the People's Republic of China, the Personal Data (Privacy) Ordinance of Hong Kong, the General Data Protection Regulation (GDPR) of the European Union, and the Personal Data Protection Law of Vietnam.

#### 二、适用范围

本政策适用于以下场景：

- 您访问本集团官方网站 ([www.texhong.com](http://www.texhong.com)) 或相关子网站；
- 您通过线上或线下渠道与本集团进行业务接洽、下达订单、产品咨询或售后服务；
- 您参与本集团组织的市场活动、客户满意度调查或行业展会；
- 您以供应商、合作伙伴身份与本集团进行业务往来时提供的相关联系人信息。

#### 2. Scope of Application

This Policy applies to the following scenarios:

- When you visit the Group's official website ([www.texhong.com](http://www.texhong.com)) or related sub-sites;
- When you conduct business negotiations, place orders, make product inquiries, or seek after-sales services through online or offline channels;
- When you participate in market activities, customer satisfaction surveys, or industry exhibitions organised by the Group;

- When you provide relevant contact information as a supplier or business partner in the course of dealings with the Group.

### 三、我们收集的个人信息类型

为您提供优质的产品与服务，我们可能收集以下类别的个人信息：

信息类别	具体内容
身份信息	姓名、职位、公司名称、统一社会信用代码/注册号
联系方式	电子邮箱、电话号码、邮寄地址、传真号码
业务信息	订单详情、产品偏好、交易记录、开票信息
技术信息	IP 地址、浏览器类型、设备信息、网站访问日志
沟通记录	与我们的业务往来邮件、会议纪要、客户服务沟通内容

我们仅在为实现特定业务目的所必需的范围内收集个人信息，并确保收集方式合法、正当、透明。

### 3. Types of Personal Information We Collect

To provide you with high-quality products and services, we may collect the following categories of personal information:

Information Category	Specific Contents
<b>Identity Information</b>	Name, position, company name, Unified Social Credit Code / registration number
<b>Contact Information</b>	Email address, phone number, postal address, fax number
<b>Business Information</b>	Order details, product preferences, transaction records, invoicing information
<b>Technical Information</b>	IP address, browser type, device information, website access logs

Information Category	Specific Contents
<b>Communication Records</b>	Business correspondence emails, meeting minutes, customer service communications

We collect personal information only to the extent necessary for specific business purposes, and we ensure that the collection methods are lawful, legitimate and transparent.

#### 四、我们如何使用您的个人信息

我们收集的个人信息将用于以下目的：

1. **业务履约：**处理您的订单、安排生产与交付、提供售后服务及技术支持；
2. **客户沟通：**回应您的咨询、投诉或建议，发送订单状态更新及重要通知；
3. **市场与产品优化：**开展客户满意度调查，分析产品使用偏好，改进产品质量与服务；
4. **合规与风险管理：**履行反商业贿赂、反洗钱等法定义务，防范欺诈与安全事件；
5. **法律要求：**遵守法院传票、政府调查等法律程序，或为保护本集团、客户及公众的合法权益所必要。

我们承诺，不会将您的个人信息用于与上述目的无关的其他用途。如需将信息用于新用途，我们将事先征得您的同意。

#### 4. How We Use Your Personal Information

The personal information we collect will be used for the following purposes:

1. **Performance of Business Obligations:** processing your orders, arranging production and delivery, providing after-sales services and technical support;
2. **Customer Communication:** responding to your enquiries, complaints or suggestions, sending order status updates and important notifications;
3. **Market and Product Optimisation:** conducting customer satisfaction surveys, analysing product preferences, improving product quality and services;
4. **Compliance and Risk Management:** fulfilling legal obligations such as anti-bribery and anti-money laundering, preventing fraud and security incidents;
5. **Legal Requirements:** complying with court subpoenas, government investigations or other legal procedures, or as necessary to protect the legitimate rights and interests of the Group, our customers and the public.

We undertake not to use your personal information for any other purposes unrelated to the above. If we need to use the information for new purposes, we will obtain your prior consent.

## 五、信息共享与披露

我们仅在以下必要且合法的情形下共享您的个人信息：

1. **集团内部共享：**为统一客户服务标准与业务协同，您的信息可能在集团控股的子公司之间共享，所有接收方均受本政策约束；
2. **第三方服务提供商：**我们可能委托可信赖的第三方（如物流承运商、IT 服务商、审计机构）处理您的信息，该等第三方仅可在提供服务所必需的范围内访问信息，并承担相应的保密义务；
3. **法律合规要求：**当法律法规、法院命令或政府监管机构要求时，我们可能依法披露相关信息；
4. **业务转让：**在合并、收购或资产转让等情形下，您的信息可能作为交易的一部分转移，我们将提前通知您并确保接收方继续遵守本政策。

我们不会出售、出租或非法向任何第三方提供您的个人信息。

### 5. Information Sharing and Disclosure

We share your personal information only in the following necessary and lawful circumstances:

1. **Intra-Group Sharing:** To unify customer service standards and business coordination, your information may be shared among the Group's subsidiaries, all of which are bound by this Policy;
2. **Third-Party Service Providers:** We may engage trusted third parties (e.g., logistics carriers, IT service providers, audit firms) to process your information. Such third parties may access the information only to the extent necessary to perform the services and are subject to corresponding confidentiality obligations;
3. **Legal Compliance:** We may disclose information as required by laws, regulations, court orders or government regulatory authorities;
4. **Business Transfers:** In the event of a merger, acquisition or asset transfer, your information may be transferred as part of the transaction. We will notify you in advance and ensure that the recipient continues to comply with this Policy.

We **will not** sell, rent or unlawfully provide your personal information to any third party.

## 六、数据安全保护措施

本集团已建立并持续完善信息安全管理体系，采取包括但不限于以下措施保障您的数据安全：

- **组织保障：**设立数智管理部专职负责信息安全管理，指派特定部门管理数据的权限及存取权限；
- **技术防护：**安装及更新防火墙以防止数据泄露，部署入侵检测、数据加密传输、访问控制等技术手段；
- **权限管理：**建立 IT 账户/权限申请制度，对被授权访问个人信息的人员实行最小授权的访问控制策略；
- **数据备份与灾难恢复：**定期进行数据备份与灾难恢复演练，确保数据可恢复性；

- **病毒防范与终端安全：**指定专人负责计算机病毒防范，禁止使用盗版及假冒软件；
- **员工保密义务：**所有员工须签署保密协议，严格遵守保密规定，未经授权不得泄露或滥用客户数据，违反者可遭纪律处分直至终止雇佣关系；
- **应急响应：**制定信息安全事件应急预案，定期开展应急演练，确保在发生数据安全事件时能够快速响应、有效处置。

## 6. Data Security Protection Measures

The Group has established and continuously improves its information security management system, adopting the following measures, among others, to safeguard your data security:

- **Organisational Safeguards:** A dedicated Digital Intelligence Management Department is responsible for information security, and specific departments are assigned to manage data access rights and permissions;
- **Technical Protection:** Firewalls are installed and updated to prevent data leakage, and technical measures such as intrusion detection, data encryption transmission, and access control are deployed;
- **Access Management:** An IT account/authorisation application system is in place, and personnel authorised to access personal information are subject to a least-privilege access control policy;
- **Data Backup and Disaster Recovery:** Regular data backups and disaster recovery drills are conducted to ensure data recoverability;
- **Virus Prevention and Endpoint Security:** Designated personnel are responsible for computer virus prevention, and the use of pirated or counterfeit software is prohibited;
- **Employee Confidentiality Obligations:** All employees are required to sign confidentiality agreements and strictly comply with confidentiality regulations. Unauthorised disclosure or misuse of customer data is prohibited, and violations may result in disciplinary action up to and including termination of employment;
- **Emergency Response:** An information security incident emergency response plan is established, and regular emergency drills are conducted to ensure rapid and effective response to data security incidents.

## 七、数据跨境传输

作为跨国运营企业，本集团的业务覆盖中国大陆、越南、美洲等多个国家和地区。为统一管理与服务之需，您的个人信息可能被传输至并存储于我们设有运营机构的国家或地区。在此类跨境数据传输中，我们将：

- 确保传输行为符合数据源所在国家或地区的法律法规要求；
- 采取适当的合同条款或其他合法机制（如隐私影响评估），确保数据接收方提供不低于本政策所承诺的保护水平；
- 仅在为实现本政策所述目的所必要的最短期内保留您的个人信息。

## 7. Cross-Border Data Transfer

As a multinational enterprise, the Group operates in multiple countries and regions, including Mainland China, Vietnam and the Americas. For unified management and service purposes, your personal information may be transferred to and stored in the countries or regions where we have operating entities. In such cross-border data transfers, we will:

- Ensure that the transfer complies with the laws and regulations of the country or region where the data originates;
- Adopt appropriate contractual clauses or other legal mechanisms (such as privacy impact assessments) to ensure that the data recipients provide a level of protection no less than that promised in this Policy;
- Retain your personal information only for the shortest period necessary to fulfil the purposes set out in this Policy.

## 八、数据留存

我们将在为实现本政策所述目的所必需的期限内保留您的个人信息，除非法律法规要求更长的保存期限。超出留存期限后，我们将对您的个人信息进行删除或匿名化处理。

## 8. Data Retention

We will retain your personal information for the period necessary to fulfil the purposes described in this Policy, unless a longer retention period is required by law. After the retention period expires, we will delete or anonymise your personal information.

## 九、您的权利

根据适用的数据保护法律，您对您的个人信息享有以下权利：

1. **知情权**：了解我们如何收集、使用和共享您的个人信息；
2. **访问权**：请求访问我们持有的您的个人信息副本；
3. **更正权**：发现信息不准确或不完整时，请求更正或补充；
4. **删除权**：在特定情形下（如信息已不再必要、您撤回同意等），请求删除您的个人信息；
5. **限制处理权**：在特定情形下请求限制对您信息的处理；
6. **数据可携权**：请求将您的个人信息以结构化、通用格式转移给另一控制者；
7. **撤回同意**：如处理基于您的同意，您有权随时撤回同意；
8. **投诉权**：向您所在地的数据保护监管机构提出投诉。

如您希望行使上述权利，请通过本政策第十条所列联系方式提交请求。我们将在法定期限内（通常为30天）对您的请求进行核实并予以回复。

## 9. Your Rights

Under applicable data protection laws, you have the following rights regarding your personal information:

1. **Right to be Informed:** to understand how we collect, use and share your personal information;
2. **Right of Access:** to request access to a copy of your personal information held by us;
3. **Right to Rectification:** to request correction or supplementation of inaccurate or incomplete information;
4. **Right to Erasure:** to request deletion of your personal information in specific circumstances (e.g., when the information is no longer necessary, or when you withdraw your consent);
5. **Right to Restriction of Processing:** to request restriction of processing of your information in specific circumstances;
6. **Right to Data Portability:** to request that your personal information be transferred to another controller in a structured, commonly used format;
7. **Right to Withdraw Consent:** where processing is based on your consent, you have the right to withdraw your consent at any time;
8. **Right to Lodge a Complaint:** to lodge a complaint with the data protection supervisory authority in your jurisdiction.

If you wish to exercise any of the above rights, please submit your request through the contact details provided in Section 10 of this Policy. We will verify and respond to your request within the statutory timeframe (usually 30 days).

## 十、联系我们

如您对本政策有任何疑问、意见或请求，或希望举报与客户隐私相关的不当行为，可通过以下方式联系我们：

渠道	联系方式
电子邮件	<a href="mailto:info@texhong.com">info@texhong.com</a>
联系电话	+86-21-2068 0000 / +86-21-2076 2678
信函地址	中华人民共和国上海市黄浦区中山东二路 88 号外滩 SOHO C 栋 23 楼
官方网站	<a href="http://www.texhong.com">www.texhong.com</a>

### 10. Contact Us

If you have any questions, comments or requests regarding this Policy, or wish to report any misconduct related to customer privacy, you may contact us through the following channels:

Channel	Contact Details
<b>Email</b>	<a href="mailto:info@texhong.com">info@texhong.com</a>
<b>Phone</b>	+86-21-2068 0000 / +86-21-2076 2678
<b>Postal Address</b>	23/F, Tower C, Bund SOHO, No. 88 East Zhongshan No. 2 Road, Huangpu District, Shanghai, People's Republic of China, Postal Code 200001
<b>Official Website</b>	<a href="http://www.texhong.com">www.texhong.com</a>

### 十一、政策的更新与通知

本政策可能根据法律法规变化、业务发展需要或行业最佳实践进行适时修订。如有任何重要修订，我们会通过您提供的联系方式通知您。修订后的政策将发布在本集团官方网站 ([www.texhong.com](http://www.texhong.com))。本集团将每年对本政策开展合规复核与内容更新，相关变动情况于当年 ESG 报告中同步披露。建议您定期查阅本政策，以了解最新的隐私保护实践。

本政策自发布之日起生效。

#### 11. Policy Updates and Notifications

This Policy may be amended from time to time in response to changes in laws and regulations, business developments, or industry best practices. In the event of any material amendments, we will notify you through the contact details you have provided. The revised Policy will be published on the Group's official website ([www.texhong.com](http://www.texhong.com)). The Group will conduct compliance review and content revision of this Policy every year, and relevant adjustments will be disclosed in the corresponding annual ESG Report. We encourage you to review this Policy periodically to stay informed of the latest privacy protection practices.

**This Policy takes effect from the date of publication.**

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