

GiantKONE Personal Information Processing Rules

The Personal Information Processing Rules (hereinafter referred to as the “Rules”) provide users with the general information on how GiantKONE Elevator Co., Ltd. and KONE Corporation (hereinafter referred to as “GiantKONE” or “We”) process (“processing” referred to in the Rules includes collection, storage, use, processing, transmission, transfer, cross-border provision, provision, entrusted processing, disclosure, deletion, etc.) users’ personal information. Where products (or services) and application/website/platform have special personal information processing rules, the special personal information processing rules shall prevail. Please read and understand the *Personal Information Processing Rules* carefully before using our products (or services), logging in, registering, using, or browsing the related application/website/platform. We will revise the Rules in due course.

The Rules will help users understand the following:

1. Basic Principles for Processing Users’ Personal Information
2. Collection and Processing of Users’ Personal Information
3. Purpose of Processing Users’ Personal Information
4. Storage Period of Users’ Personal Information
5. How We Provide, Transfer, and Disclose the Collected User Personal Information to Others
6. How We Process and Entrust the Processing of Users’ Personal Information
7. How we protect users' personal information
8. User's right of individual information protection
9. Cross-border Provision
10. How the Rules are Updated
11. How to contact us

1. Basic Principles for Processing Users' Personal Information

- 1.1. We process users' personal information based on the principles of legality, legitimacy, necessity, and good faith pursuant to the laws and regulations of the People's Republic of China;
- 1.2. We collect users' personal information within the minimum necessary scope to achieve the purpose and process their personal information in a way that has the least impact on personal rights and interests;
- 1.3. We publicize users' personal information processing rules based on the principles of openness and transparency and expressly indicate the purpose, method, and scope of processing;
- 1.4. We will make every effort to ensure the quality of personal information and avoid adverse effects on personal rights due to inaccurate and incomplete personal information;
- 1.5. We will take the necessary measures to ensure the security of the personal information processed.

2. Collection and Processing of Users' Personal Information

2.1. Definition of personal information and its processing

Personal information refers to various kinds of information related to an identified or identifiable natural person recorded electronically or by other means (excluding anonymized information), such as name, date of birth, ID number, personal biometric information, address, mailing/contact information, communication record and content, account password, property information, credit information, whereabouts, accommodation information, health and physiological information, and transaction information.

The processing of personal information includes the collection, storage, use, processing, transmission, provision, disclosure, and deletion of personal information, etc.

2.2. Why we collect and process users' personal information

- (1) To provide users with the basic functions of our products and/or services, users should authorize us to collect and process the necessary personal information. If users refuse to provide the corresponding information, they will not be able to use our products and/or services normally;
- (2) To provide users with additional functions of products and/or services, users can choose to authorize us to collect and process personal information. If users refuse to provide the corresponding information, they will not be able to use the relevant additional functions or achieve the functional effects we intend to achieve. However, their normal use of the basic functions of products and/or services will not be affected.

2.3. **For partners and their staff, we will collect and process the following types of personal information:**

- (1) Basic personal information: name, company, position, practice qualification, birthday, contact address, phone number, e-mail address, language;
- (2) Personal identity information: **ID card** or other identity authentication information;

- (3) Personal property information: **Billing information;**
 - (4) Other information: Voice;
 - (5) Other personal information related to business relations and security control.
- 2.4. **For individual customers of KONE, we will collect and process the following types of personal information:**
- (1) Basic personal information: Name, phone number, and location;
 - (2) Personal property information: **Billing information;**
 - (3) Other personal information related to business relations and security control
- 2.5. **For job candidates of KONE, we will collect and process the following types of personal information:**
- (1) Basic personal information: Name, birthday, gender, ethnicity, nationality, family relationship, address, phone number, e-mail address, photo, language, social network;
 - (2) Personal identification information: **ID card;**
 - (3) Personal education and work information: Education level, academic degrees, education experience, skills, work experience, position, salary status, training records, transcripts, certificates, and licenses;
 - (4) Personal health and physiological information: **History of past and present illness;**
 - (5) Contact information: Information of family members and emergency contact;
 - (6) Other information: **Marital status, undisclosed illegal and criminal records, and disciplinary records.**

Sensitive personal information is personal information that, once leaked or illegally used, can easily lead to infringement of the personal dignity of natural persons or harm to personal and property security, including biometric authentication, religious beliefs, specific identities, medical health, financial accounts, whereabouts and other information, as well as the personal information of minors under the age of 14. The above information in **bold font** identifies the user's **sensitive personal information**, which needs to be provided by the user in a specific scenario; otherwise, the corresponding purpose cannot be achieved. When processing users' sensitive personal information, we will inform users of the necessity of sensitive personal information and the influence on their rights and interests and obtain individual consent from users in advance.

2.6. The user understands and agrees that:

To provide users with better product and service experiences, we are striving to improve technology continuously. We may launch new or optimized functions from time to time and need to collect and process new personal information or change the purpose or way of personal information processing. In this regard, we will explain to users the collection purpose, scope, and method of using the corresponding information separately by updating the Rules, pop-up windows, page prompts, etc., provide users with a way to choose and agree, collect and process the information only after obtaining

the user's consent. However, pursuant to the provisions of the *Personal Information Protection Law*, user consent is not required in the following circumstances:

- (1) When it is necessary to enter into and perform a contract in which the user is a party, or to implement human resource management based on the labor rules and regulations established according to law and the collective contract signed in accordance with the law;
- (2) When it is necessary to perform KONE's statutory duties or obligations;
- (3) When it is necessary to respond to public health emergencies, or to protect the life, health and property security of natural persons in emergencies;
- (4) When making news reports, public opinion supervision, etc. for the public interest and processing users' personal information within a reasonable scope;
- (5) When processing the personal information disclosed by users themselves or other personal information that has been legally disclosed within a reasonable scope pursuant to the laws and regulations of the People's Republic of China;
- (6) In other circumstances stipulated by laws and administrative regulations.

2.7. We (or our third-party partners) may collect and process user information through cookies and store it as log information. We use our cookies to provide users with more personalized experiences and services and use them for the following purposes:

- (1) User's username, e-mail address, and contact preferences. They allow us to create accounts for users, provide them with a convenient and personalized account access experience, offer and support services. Such information also helps us communicate with users on the use of services, product announcements, software updates, etc., and respond to requests for assistance from app/website/platform users (including account verification support when users encounter difficulties in accessing their accounts).
- (2) Device or software information, such as the configuration information provided by the user's mobile device, web browser, or other programs used to access the service, the version used by the user's mobile device, and device hardware information. We collect this information to provide better services, including localized processing of the user's experience of using this software service. Moreover, it helps us better understand how users use the service.
- (3) Information about the products and services used by users. Such information will help us provide and support services and respond to requests for assistance from application/website/platform users. We also collect this information to understand better how users use the service.
- (4) Any content added by users on the account. We only use this information to ensure that users can obtain this information when using the service.
- (5) Users can manage or delete cookies based on their preferences. They can clear all cookies saved on the computer, and most web browsers have a function to block cookies. However, if users

perform the operation themselves, they need to change the user settings personally every time they visit our client.

3. Purpose of Processing Users' Personal Information

We may process users' personal information for the following purposes:

- 3.1. Implement human resource management;
- 3.2. Provide users with more accurate services;
- 3.3. Use the information for identity verification, customer service, security prevention, fraud monitoring, archiving, and backup purposes when we provide services to ensure the security of the products and services we provide to users;
- 3.4. Help us design new services and improve our existing ones;
- 3.5. Allow us to understand better how users access and use our services so that we can respond to the personalized needs of the app/website/platform users in a targeted manner, such as language settings, location settings, personalized help services and instructions, or other responses to users and other users;
- 3.6. Software certification or management software upgrade;
- 3.7. Allow users to participate in surveys about our products and services.

4. Storage Period of Users' Personal Information

We will only retain users' personal information for the shortest period necessary to achieve the purpose stated in the Rules unless it is necessary to extend the retention period or is permitted by law. If personal information cannot be timely deleted due to technical reasons, we will stop processing other than storing and taking necessary security protection measures.

5. How We Provide, Transfer, and Disclose the Collected User Personal Information to Others

If we provide or transfer users' personal information to others, we will obtain the users' individual consent in advance. For all user personal information provided and transferred, we make every effort to confirm that the recipient has the legal basis for receiving personal information. Moreover, we will control the provided personal information to the minimum necessary scope and use secure methods for transmission. We will sign confidentiality agreements with recipients or use other methods required by Chinese laws and regulations, require the recipients to process personal information pursuant to our instructions, the Rules, and any other relevant confidentiality and security measures, and prohibit them from using such information for purposes unauthorized by the user. Otherwise, we will require the recipients to re-seek authorization and consent from the user.

6. How We Process and Entrust the Processing of Users' Personal Information

- 6.1. Some specific modules or functions of our goods or services may be provided by external suppliers, affiliates, or other professional institutions.
- 6.2. For companies, organizations, and individuals that accept our entrusted processing, if they may come into contact with users' personal information, we will use the methods required in the entrusted processing agreements and confidentiality agreements signed with them or other methods required by Chinese laws and regulations, require them to process personal information pursuant to our instructions, the Rules and any other relevant confidentiality and security measures, prohibit them from using such information for unauthorized purposes, and supervise the trustee's personal information processing activities;
- 6.3. When the entrusted relationship is terminated, we will stop providing users' personal information and request the entrusted party to return or delete the personal information;
- 6.4. Without our consent, the entrusted party shall not delegate to others to process users' personal information.

7. How we protect users' personal information

- 7.1. We have used security protection measures that comply with industry standards to protect personal information provided by users and prevent unauthorized access, public disclosure, use, modification, damage, or loss of data. We will take all reasonable and feasible measures to protect the personal information of users.
- 7.2. Users shall understand that the Internet environment is not 100% secure. We will make every effort to ensure the security of the information sent by users to us. However, due to technical limitations and various malicious means that may exist, even if we have made every effort to strengthen security measures, it is impossible to always guarantee 100% security. In case of any unfortunate security incident on personal information, we will deal with it pursuant to the requirements of laws and regulations.

8. User's right of individual information protection

8.1. View and copy the user's personal information

Users can request to view and copy their personal information. They can also request the transfer of their personal information to a designated personal information processor. We will provide the means for the transfer if the conditions specified by the national cyberspace administration are met.

8.2. Correct and supplement the user's personal information

If users identify inaccurate or incomplete personal information processed by us, they shall have the right to request us to make corrections or supplements.

8.3. Delete the user's personal information

In the following circumstances, users can request us to delete their personal information:

- (1) The purpose of processing has been achieved, cannot be achieved, or is no longer necessary to be achieved;
- (2) We have stopped providing the products or services, or the storage period has expired;
- (3) The user withdraws the consent;
- (4) We process personal information in violation of laws, administrative regulations, or agreements;
- (5) Other circumstances stipulated by laws and administrative regulations.

If the storage period stipulated by laws and administrative regulations has not expired, or the deletion of personal information is technically difficult to implement, we will stop processing other than storing and taking necessary security protection measures.

8.4. Respond to user's above requests

- (1) Users who want to exercise the aforesaid rights or need us to explain the specific terms of these Rules can do so through the official account dialog box or by sending an e-mail to CHN-CustomerCare@kone.com or personaldatarequest@kone.com operate.
- (2) To ensure security, we may need users to provide a written request or prove their identity in other ways. We may ask users to verify their identity before processing their request.
- (3) We will reply within 30 days. Users who are not satisfied shall have the right to lodge a complaint with the supervisory authority or file a lawsuit with the competent judicial authority.
- (4) In the following situations, pursuant to the requirements of laws and regulations, we will not be able to respond to the user's request but will explain the situation to the user:
 - a) Directly related to national security and national defense security;
 - b) Directly related to public security, public health, and major public interests;
 - c) Directly related to criminal investigations, prosecutions, trials, and executions of judgments;
 - d) Presence of sufficient evidence to prove that the user has subjective malice or abuse of rights;
 - e) Responding to the user's request will cause severe damage to the legitimate rights and interests of the user, other individuals, or organizations.
 - f) Involving trade secrets.

9. Cross-border Provision

- 9.1. In principle, the personal information we collect and generate within the territory of the People's Republic of China shall be stored in the territory of the People's Republic of China.
- 9.2. As we are a multinational company, we use various global management systems and tools. Due to technical and practical requirements, our partners may also process personal information overseas. This means that **users' personal information may be transferred to or accessed from overseas jurisdictions. For example, to achieve the purposes set out in Article 3 of the Rules, GiantKONE Elevator Co., Ltd. will provide your personal information (see Article 2**

of the Rules for details on the types of personal information) to KONE Corporation (see Article 12 of the Rules for contact details).

- 9.3. We will provide users' personal information across the border for the purposes of operation management, business development, product functions, understanding of equipment operation, and assistance in product and service improvement. In this case, we will require overseas recipients to take protective measures that comply with the personal information protection standards for your personal information through agreements and other forms. **If the cross-border provision is required, we will inform users of the overseas recipient's name, contact information, processing purpose, processing method, types of personal information, methods and procedures for users to exercise their rights to the overseas recipient, and obtain the individual consent from the users in advance.**

10. How the Rules are Updated

As the business grows, we may need to update these Rules to adapt to changes in services, businesses, and applicable laws. Without the express consent of users, we will not reduce the rights that they are entitled to under the Rules. We will announce any changes made to the Rules in the form of a notice.

11. How to contact us

Users who have any questions, comments, or suggestions about the Rules can contact us at any time by phone or by logging in to the client:

Company: GiantKONE Elevator Co., Ltd.

Address: 2005, Xunzhi Road, Nanxun Economic Development Zone, Huzhou, Zhejiang Province

Contact Tel: 0572-3017777

E-mail: comms@giantkone.com

Company: KONE Corporation

Address: KONE Building, Keilasatama 3, 02150 Espoo, Finland

Tel: +358 204 751

E-mail: personaldatarequest@kone.com

(No text below)

GiantKONE Elevator Co., Ltd.

KONE Corporation

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