



个人信息保护政策

最近修订日期：2022 年 6 月 8 日

生效日期：2022 年 6 月 16 日

您的信任对我们非常重要，谷仓及其运营集团、子公司和分支机构（下称“谷仓”或“我们”）期望为您提供优质服务。在谷仓，我们致力于保护您的隐私以及以电子或以其他方式记录的与已识别或可识别自然人相关的各种信息（不包括匿名信息，下称“个人信息”）的安全。鉴于此，我们制定了本个人信息保护政策（以下简称“本政策”），旨在向您说明，在您访问我们的网站、咨询或使用我们的服务时，我们会如何收集、使用、处理、保存、共享和传输您的个人信息。

当本政策提及“谷仓”或“我们”时，是指实际为您提供服务并且根据本政策决定您个人信息的处理目的和处理方式的谷仓法律实体。

当您在中华人民共和国境内使用我们的服务时，您的个人信息由深圳易可达科技有限公司处理。当您在香港特别行政区及全球其他国家或地区使用我们的服务时，您的个人信息由香港亿格有限公司处理。两者为独立的个人信息处理者，各自向您承担独立的个人信息保护责任。

联系信息：

深圳易可达科技有限公司

致：法务部

地址：深圳市龙岗区坂田街道贝尔路神舟大厦 8 楼

香港亿格有限公司

致：法务部

地址：RM19C LOCKHART CTR 301-307 LOCKHART RD WAN CHAI HK

有关您的个人信息的问题或请求，您可以联系我们的个人信息保护负责人 DPO@ztn.com。

本政策将帮助您了解一下内容：

- 一、本政策是否适用于您？
- 二、谷仓收集哪些个人信息？如何使用？
- 三、谷仓如何使用 Cookies？
- 四、谷仓如何共享、转让、公开披露您的个人信息？
- 五、谷仓采取哪些措施来保护您的个人信息？
- 六、谷仓如何存储您的个人信息以及存储多长时间？
- 七、您可以就您的个人信息行使哪些权利？

八、本政策如何更新？

九、您如何联系谷仓？

一、本政策是否适用于您

如果您是谷仓的客户或者您访问谷仓的网站 www.goodcang.com、<http://toms.hwcservice.com> 和公众号平台（以下称“网站”），则本政策适用于您。

我们的网站面向一般受众，而不针对儿童。原则上，我们不会收集 14 岁以下儿童的个人信息。如果您未满 14 岁且希望使用我们的服务，请让父母或监护人协助您。

如果 14 岁以下的儿童可能向我们披露了个人信息，父母或监护人可以联系谷仓，我们将按您的要求删除个人信息。

若谷仓向您提供服务过程中对您个人信息的处理行为适用中华人民共和国以外的相关法律法规，谷仓将按照 [《隐私声明》国际版（具体详见本政策尾部）](#) 的约定收集、使用、共享、存储和保护您的个人信息，而不适用本政策。

二、谷仓收集哪些个人信息？如何使用？

在业务活动和提供服务的过程中，谷仓将需要处理个人信息。没有您的个人信息，我们将无法为您提供所需的服务。

- 为使用我们服务之目的，您自愿提供给我们的个人信息
 - 谷仓收集由客户或我们网站的访客向我们提供的个人信息。如果您是客户，那么我们会直接从您处收到您的个人信息。
 - 当您访问我们的网站，希望咨询我们的服务内容或获取报价单时，您自愿通过网站的在线联系表提交您的姓名、电话、邮箱、微信号、QQ 号、所在公司名称、公司所在城市或在线联系表上显示的其他必要信息。我们可能会使用您的信息就您的服务需求与您联系。
 - 您注册成为我们的客户、开设谷仓网站账号，成为账号持有人时，您需要向我们提供的您本人的个人信息，包括您的姓名、电话号码、电子邮箱、住址/联系地址、**身份证或护照证件照片、付款账号或银行信息等**。该处理是履行您与谷仓之间服务合同所必需的。
 - 为了签署服务合同和履行具体服务订单，您需要提交您的姓名、地址和电话号码以被列为委托方。我们还需要收集您的订单信息，包括始发地、目的地、邮政编码、您的货物信息。该处理是履行您与谷仓之间服务合同所必需的。
 - 为履行身份验证和安全保障法律义务，您需要提供身份信息，其中可能包括**身份证或护照号码和证件照片**等。该处理是我们履行我们的法律义务所必需的。
 - 我们可能会使用您的偏好信息、您的咨询与投诉、我们与您的沟通记录和其他互动信息来开发和改进谷仓的产品和/或服务，例如分析货物信息和与服务的相关信息以改进我们的服务，您的偏好信息包括发货数量、货物 SKU、商品种类、始发地、目

的地、投诉、相关商业活动、沟通和调查信息。

● 我们间接收集的信息

- 当您并非货物的寄件人和收件人时，我们从您处收集寄件人和收件人的姓名、电话号码、电子邮件地址、地址和邮政编码，以便履行与您服务合同约定的委托事项，包括安排报关、清关和配送。
- 在做身份验证和签署服务合同时，您向我们提供的您所在企业法定代表人、负责人或董事或授权代理人的个人信息，包括姓名、电话号码、电子邮箱、住址或联系地址、**身份证或护照号码及证件照片**，以便我们完成账号真实性验证并与您签署服务合同。
- 您委托第三方代为支付订单价款而向我们提供的第三方付款人的付款账号或银行信息。

当谷仓间接收到个人信息时，我们依赖您来确保信息的准确性，并且您有权向谷仓提供该信息。因此，**您承诺并保证，若您提供的信息中含有其他第三方的个人信息，在您提供这些个人信息之前，您已经告知第三方且第三方已经同意您将其个人信息提供给我们。**

● 我们自动收集的信息

- 当您访问我们的网站时，我们可能会自动从您的设备收集某些信息。这将包括 IP 地址、唯一设备或用户标识号、系统和浏览器类型、日期和时间、您在我们的网站或移动应用程序上访问的内容和页面、行为发生的日期、时间和位置。
- 收集这些信息使我们能够更好地了解访问我们网站的访客、他们来自哪里以及他们对我们网站上的哪些内容感兴趣。我们将这些信息用于内部分析目的，并提高我们网站的质量和对外访客的相关性。我们还需要根据中国法律法规保留日志以记录我们网站的网络活动。
- 为了提高您使用谷仓用户端提供的服务的安全性，为了更准确地预防钓鱼网站欺诈和木马病毒，谷仓可能会通过了解一些您的网络使用习惯、您常用的软件信息等手段来判断您账号的风险，并可能会记录一些谷仓认为有风险的 URL。
- 此类信息可能会通过使用 cookies 和类似的跟踪技术收集，详细说明见下文的“**谷仓如何使用 cookies**”标题模块。

● 与我们合作的第三方向您收集的信息

在某些特定业务场景下，为了提高业务处理能力、提升响应速度、保障网站使用安全或其他方面考虑，我们可能会使用有能力的第三方服务商提供的软件服务工具包（简称 SDK）来为您提供服务。以下 SDK 可能会收集和使用您的个人信息，您在此授权并同意我们使用如下 SDK：

实名认证服务商杭州天谷信息科技有限公司 e 签宝

为验证您的真实身份并确保您使用账号的安全性，防止账号被冒用，我们委托第三方实名认证服务商为您提供实名认证服务，您同意我们将您的身份信息提供给第三

方实名认证服务商完成实名认证，同时，您同意第三方实名认证服务商可以根据认证要求自行向您收集相应的身份信息（姓名、身份证号码）、企业信息（企业营业执照、法定代表人身份信息）、手机号码、银行信息、生物识别特征（静态或动态的面部特征）以完成实名认证。当您使用第三方实名认证服务商的服务并向其提供个人信息时，我们与第三方实名认证服务商分别作为独立的个人信息处理者，各自按照本政策以及第三方实名认证服务商的隐私政策为您提供实名认证服务。我们强烈建议您在完成实名认证的过程中认真阅读第三方实名认证服务商的隐私政策。

- 可能被认定为敏感个人信息的信息

- 本政策中，敏感个人信息是一旦泄露或者非法使用，容易导致您的人格尊严收到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息。
- 我们将确保处理您的敏感个人信息对于实现本政策中所述的特定目的是直接且必要的，我们对您的敏感个人信息的处理将采取严格的安全措施，并以对您的个人权益影响最小的方式进行。
- 在上述我们搜集的信息中，以下可能被认为是敏感个人信息：
 - 您的银行信息，例如银行账号或支付账号，处理您的银行信息是为了履行双方服务合同。

- 处理个人信息的原则

我们会遵循正当、合法、必要的原则，出于本政策所述的以上目的，收集和使用您在访问我们网站或使用我们的服务过程中主动提供或因使用服务而自动产生的个人信息。如果我们要将您的个人信息用于本政策未载明的其它用途，或将基于特定目的收集而来的信息用于其他目的，我们将以合理的方式向您告知，并在使用前再次征得您的同意。

- 处理个人信息的法律基础

请充分了解，我们可能会在以下情况下收集和处理您的个人信息。其法律依据可能因信息类型、拟进行的业务活动和服务，以及中国法律的要求而有所不同。

在中国法律允许的最大范围内，就无需您同意的处理行为，我们将依赖以下法律依据而进行：

- 订立或履行有关个人为当事人的合同而需要处理个人信息；
- 为履行法定职责或义务而需要处理个人信息；
- 为应对突发公共卫生事件，或者在紧急情况下保护自然人的生命、健康和财产安全而需要处理个人信息；
- 为新闻报道、舆论监督等公共利益行为在合理范围内处理个人信息；
- 个人自愿公开的个人信息或者依法公开的其他个人信息且依照相关法律规定在合理范围内处理的；
- 法律、行政法规规定的其他情形。

若我们收集和处理您个人信息的行为需要您的同意，我们的处理将基于您的同意，该等同意将按照法律法规及国家标准所要求的形式作出。该等同意为我们收集和处理您的个人信息提

供了法律依据，且您有权随时撤回您的同意。在您通知我们撤回您的同意后，谷仓将尽快停止进一步处理您的个人信息，但这将不影响撤销同意前处理的合法性。

三、谷仓如何使用 Cookies

为使您获得更轻松的访问体验，您访问谷仓客户端或使用服务时，谷仓可能会通过小型数据文件识别您的身份，这么做是帮您省去重复输入账号信息的步骤，或帮助判断您的账号安全。这些数据文件可能是 Cookie，Flash Cookie，或您的浏览器或关联应用程序提供的其他本地存储（统称“Cookie”）。

请您理解，谷仓的某些服务只能通过使用“Cookie”才可得到实现。如果您的浏览器或浏览器附加服务允许，您可以修改对 Cookie 的接受程度或拒绝谷仓的 Cookie，有关详情您可以参见 www.aboutcookies.org，但这一举动在某些情况下可能会影响您安全访问谷仓客户端和使用服务。您可以参见我们的 [《cookies 政策》](#) 获取更多信息。

四、谷仓如何共享、转让、披露您的个人信息

我们不会向第三方共享您的个人信息，除非获得您的明确同意或属于“**共享、转让、披露您的个人信息无需事先征得您的同意**”的情形。我们可能会向关联公司、合作伙伴等第三方共享您的个人信息，以保障为您提供服务顺利完成；但我们仅会出于合法、正当、必要、特定、明确的目的共享您的个人信息，并且只会共享提供服务所必要的个人信息。该等第三方无权将共享的个人信息用于任何其他用途。对我们与之共享个人信息的公司、组织和个人，我们会与其签署严格的保密协定，要求他们按照我们的协议以及本政策并采取适当的保密和安全措施来处理您的个人信息。谷仓在下列情况下将您的个人信息与第三方共享：

- 向谷仓关联方共享您的个人信息。为便于谷仓基于谷仓官网向您提供服务，识别谷仓账号异常，您的个人信息会与谷仓关联方共享。
- **委托处理：**我们会委托外部供应商协助我们向您提供相关服务，在委托处理方式之下，接收个人信息的第三方仅有权根据我们的指示代表我们为您提供服务，我们在委托范围内就其受托行为向您承担责任。例如，我们会委托支持我们业务的供应商、服务提供商和其他合作伙伴，为我们提供技术服务（如短消息验证服务）、运输、仓储、报关、清关、末端派送、支付、数据存储或数据分析服务等。
- **提供给其他个人信息处理者：**为履行与您之间缔结的合同或出于其他合理目的，我们可能会向其他个人信息处理者提供您的某些个人信息，我们将会按照法律的规定向您披露，接收个人信息的该第三方个人信息处理者有权在已告知您的处理目的、处理方式和个人信息种类等范围内处理个人信息，接收方变更原先的处理目的、处理方式的，应当重新取得您的同意。

需要特别提醒您注意，若您授权第三方要求我们提供您与谷仓服务中产生的全部或部分个人信息时，您同意我们有权根据自身经验查验您的身份及您与第三方的授权真实性，并有权自主决定同意或拒绝提供您的前述个人信息，除非您通过本政策所述的联系方式向我们作出单独指示。例如，您授权第三方金融机构、信用评级机构向我们获取您的特定个人信息，该第三方基于该授权内容要求我们提供您的个人信息时，我们将响应第三方的请求在您授权的范围内向其提供。

谷仓不会将您的个人信息转让给任何公司、组织和个人，但以下情况除外：

- 在获取您的明确同意后，谷仓会向其他方转让您的个人信息；
- 根据适用的法律法规、法律程序的要求、强制性的行政或司法要求所必须进行提供；
- 在涉及合并、收购或破产清算时，如涉及到个人信息转让，我们会在要求新的持有您个人信息的公司、组织继续受本政策的约束，否则我们将要求该公司、组织重新向您征求授权同意。

谷仓仅会在以下情况下，披露您的个人信息：

- 在获得您明确同意或基于您的主动选择，谷仓可能会披露您的个人信息；
- 在法律、法律程序、诉讼或政府主管部门强制性要求的情况下，我们可能会公开披露您的个人信息。在符合法律法规的前提下，当我们收到上述披露信息的请求时，我们会要求必须出具与之相应的法律文件，如传票或调查函。我们坚信，对于要求我们提供的信息，应该在法律允许的范围内尽可能保持透明。我们对所有的请求都进行了慎重的审查，以确保其具备合法依据，且仅限于执法部门因特定调查目的且有合法权利获取的数据。
- 如果谷仓确定您出现违反法律法规或严重违反谷仓相关协议及规则的情况，或为保护谷仓广大客户或公众的人身财产安全免遭侵害，谷仓可能依据法律法规披露关于您的个人信息，包括与您相关的违法违规行为以及谷仓已对您采取的措施。

如果发生以下情形中，**谷仓共享、转让、披露您的个人信息无需事先征得您的同意：**

- 为履行法定职责或者法定义务所必需，例如与国家安全、国防安全、与刑事侦查、起诉、审判和判决执行等直接相关的法定职责或者法定义务，或按照有关法律规定，向邮政管理部门报送您的个人信息及货物信息；
- 为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；
- 出于维护您或其他个人的生命、财产等重大合法权益但又很难得到本人同意的；
- 在合理的范围内处理你自行公开的个人信息，或者其他已经合法公开的个人信息（如合法的新闻报道、政府信息公开等渠道合法公开的个人信息）；
- 根据法律规定，若谷仓对您的个人信息采取技术措施和其他必要措施进行处理，使得数据接收方无法重新识别特定个人且不能复原，则此类处理后数据的共享、转让、披露无需另行向您通知并征得您的同意；
- 只有共享您的个人信息，才能处理因您的行为而导致谷仓与他人或您与他人的纠纷或争议，例如您发运的货物侵犯第三方知识产权，权利人要求谷仓提供您的身份信息、联系方式、货物发运量和价格以及库存数量；
- 为维护谷仓、谷仓关联方、谷仓物流合作伙伴、用户或公众的人身财产安全免遭侵害；
- 法律法规规定的其他情形。

五、谷仓采取哪些措施来保护您的个人信息？

谷仓已采取符合业界标准、合理可行的安全防护措施保护您的个人信息，防止个人信息遭到未经授权访问、公开披露、使用、修改、损坏或丢失。例如，在您的浏览器与服务器之间交换数据时受 SSL 协议加密保护；我们同时对网站提供 HTTPS 协议安全浏览方式；我们会使

用加密技术提高个人敏感信息的安全性；我们会使用受信赖的保护机制防止个人信息遭到恶意攻击；我们会部署访问控制机制，尽力确保只有授权人员才可访问个人信息；以及我们会举办安全和隐私保护培训课程，加强员工对于保护个人信息重要性的认识。

谷仓重要的信息系统已通过中国国家信息安全等级保护的测评，并且基于 ISO/IEC 27001、ISO27701 国际标准实施了信息安全管理体系和隐私管理体系。

您的账号均有安全保护功能，请妥善保管您的账号及密码信息。谷仓将通过向其它服务器备份、对用户密码进行加密等安全措施确保您的信息不丢失，不被滥用和变造。**尽管有前述安全措施，但同时也请您理解在信息网络上不存在“完善的安全措施”，谷仓建议您采取积极措施，包括但不限于使用复杂密码、定期修改密码、不将自己的账号密码等个人信息透露给他人。**如您发现自己的个人信息泄密，尤其是您的账号及密码发生泄露，请您立即联络谷仓，以便谷仓采取相应措施。

在获悉不幸发生个人信息安全事件后，谷仓将按照法律法规的要求向您告知：安全事件的基本情况、可能的影响、谷仓已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。事件相关情况谷仓将以邮件、信函、电话、推送通知等方式告知您，难以逐一告知个人信息主体时，谷仓会采取合理、有效的方式发布公告。同时，谷仓还将按照监管部门要求，上报个人信息安全事件的处置情况。

六、谷仓如何存储您的个人信息以及存储多长时间？

一般情况下，谷仓在中华人民共和国境内合法收集的您的个人信息将保存在中华人民共和国境内。

由于我们的业务性质和我们向您提供的服务，我们可能需要将您的个人信息传输到其位于中华人民共和国境外的关联公司或子公司，以履行与您的协议或实现本政策所列之目的。在我们传输个人信息的任何情况下，我们应确保此类传输受到不低于中国适用法律要求的保护级别的适当保护措施。在跨境传输或远程访问之前，我们将按照相关个人信息保护法律法规的要求完成相应的程序。

除非适用法律或法规另有允许或要求，否则我们只会为实现我们收集个人信息的目的、履行法定义务、会计或报告义务或为解决纠纷等目的保留您的个人信息。为确定个人信息的适当保留期限，我们会考虑适用的法律要求、个人信息的数量、性质和敏感性、未经授权使用或披露您的个人信息可能造成的损害风险、我们处理您的个人信息的目的以及我们是否可以通过其他方式实现这些目的。在某些情况下，我们可能会匿名化您的个人信息，使其不再与您相关联。我们保留将此类匿名和去识别化信息用于任何合法商业目的的权利，不用另行通知您或征得您的同意。

如果您对具体保留期限有疑问，请与我们联系。

七、您可以就您的个人信息行使哪些权利？

根据适用于您的个人信息使用方面的法律，您可能拥有与您的个人信息相关的权利。请注意，在某些情况下，我们不需要完全执行您的要求，因为此类权利可能是有条件的，或者因为我们必须平衡您的权利与我们处理您的个人信息以及保护他人的权利和自由的权利和义务。您在中国享有的与您的个人信息相关的权利说明如下：

查询和访问您的个人信息

您有权随时访问您的个人信息，法律法规规定的例外情况除外。如果您想行使访问权，您可以随时通过本政策约定的联系方式联络我们。您所需要访问的个人信息通常会以电子方式提供给您。我们可能会要求您在提供所需信息之前证明您的身份。

更正您的个人信息

我们采取合理措施确保我们持有的您的相关信息准确和完整。但是，如果您认为情况并非如此，您可以随意通过本政策约定的联系方式联络我们并要求我们修改有关您的任何不完整或不准确的个人信息。

删除您的个人信息

您可能有权要求我们删除您的个人信息，例如在我们收集的个人信息不再需要用于原始目的、个人信息已过时或您撤回同意的情况下（如果我们正在基于同意处理您的个人信息）。但是，这需要与其他因素进行权衡。例如，由于某些法律或监管义务，我们可能无法满足您的要求。

拒绝我们处理您的个人信息

您可能有权拒绝我们基于合法利益之目的而处理您的个人信息。您有权随时拒绝为市场营销之目的而处理您的个人信息。当您通知我们停止将您的个人信息用于市场营销之目的时，谷仓将立即停止使用您的个人信息。

当您基于您在特殊情景下的立场而提出拒绝时，我们将不再基于我们合法利益之其他目的来处理您的个人信息，除非我们有强有力的合法依据。请注意，我们可能无法为您提供某些服务，如果我们无法基于该目的处理所需的个人信息。

撤回同意的权利

在特定情况下，我们可能会征求您的同意来处理您的个人信息。当我们这样做时，您有权随时撤回您的同意。在您撤回同意后，谷仓将尽快停止进一步处理。但是，这并不影响撤回同意之前所进行处理的合法性。

请使用本政策约定的联系方式提出有关这些权利的请求。为保障安全，您可能需要提供书面请求，或以其他方式证明您的身份。我们可能会先要求您验证自己的身份，然后再处理您的请求。我们将在三十天内作出答复。

在以下情况下，我们将无法响应您的请求：

- 要求提供的信息与我们履行法律义务有关的；
- 要求提供的信息与国家利益、国防直接相关的；
- 要求提供的信息与公共利益、公共卫生和安全直接相关的；
- 要求提供的信息与刑事侦查、起诉、审判和判决执行直接相关的；
- 我们有合理的证据证明您有恶意或打算滥用您的数据主体权利的；
- 响应数据主体请求将导致侵犯数据主体或其他个人、组织的合法权益的；
- 要求提供的信息与商业秘密有关。

八、本政策如何更新

谷仓可能不定时对本政策做出变更或修改。未经您明确同意，我们不会削减您按照法律法规所享有的权利。当谷仓需要对本政策做出变更或修改的，谷仓将通过谷仓客户端公告通知您。

若本政策做出重大变更或修改的，谷仓会提供更为显著的通知（包括在谷仓客户端以推送通知、弹窗的形式向您展示）。在我们向您收集更多的个人信息或我们因为新的目的使用或披露您的个人信息时，我们会根据适用法律要求，再次征得您的同意。

本政策所指的重大变更包括但不限于：

- 我们的服务模式发生重大变化。如处理个人信息的目的、处理的个人信息类型、个人信息的使用方式等；
- 我们在所有权结构、组织架构等方面发生重大变化。如业务调整、破产并购等引起的所有者变更等；
- 个人信息共享、转让或公开披露的主要对象发生变化；
- 您参与个人信息处理方面的权利及其行使方式发生重大变化；
- 我们负责处理个人信息安全的责任部门、联络方式及投诉渠道发生变化时；
- 个人信息安全影响评估报告表明存在高风险时。

我们还会将本政策的旧版本存档，供您查阅。

九、您如何联系谷仓

我们设立了个人信息保护专职部门，如果您对本政策有任何疑问、意见或建议，您可以通过以下方式与其联系：DPO@ztn.com

一般情况下，我们将在三十天内回复。当我们收到有关您个人信息相关的权利请求、问题咨询等时，或者您的问题本身涉及比较重大的事项，我们可能会要求验证您的身份。

如果您对我们的回复不满意，特别是我们的个人信息处理行为损害了您的合法权益，您还可以向中国的网信、电信、公安及工商等监管部门寻求解决方案。

GOODCANG GLOBAL PRIVACY STATEMENT

1. INTRODUCTION

We are pleased that you come to us and are interested in our company, products and services. Your trust is important to us. We are committed to protecting your privacy and the security of information that can directly or indirectly be used to identify a natural person(hereinafter “**Personal Data**”) during the processing throughout the entire business process . GoodCang has created this Privacy Statement to explain how we collect and use your Personal Data.

Last updated: June 8, 2022.

When this Privacy Statement mentions “**GoodCang**”, “**we**”, “**us**”, it is referring to the GoodCang company that is decided on the purposes and means of the processing of your Personal Data under this Privacy Statement. When you are using our services in Mainland China, your Personal Data is controlled by **Shenzhen Yikeda Technology Co., Ltd.** When you are using our services in other countries or regions to arrange your parcels to move from China to other countries or regions worldwide, your Personal Data is controlled by **ETARGETED LIMITED**.

Contact Information:

Shenzhen Yikeda Technology Co., Ltd.

Attn: Legal Department

8th Floor, Shenzhou Building, Bell Road, Bantian Street, Longgang District, Shenzhen

ETARGETED LIMITED

Attn: Legal Department

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If you have any questions about our use of your personal data during or after reading this Privacy Statement, you can of course always contact us through the email of DPO@ztn.com.

2. DOES THIS PRIVACY STATEMENT APPLY TO YOU?

This Privacy Statement applies to you if you are a customer of GoodCang or if you contact GoodCang, for instance, by visiting www.goodcang.com or <http://toms.hwcservice.com> including any pages and mobile apps (hereafter “**Websites**”), or if you receive emails from GoodCang.

Our Websites, products and services are for a general audience and not aimed at children. In principle, we do not collect Personal Data from children under age 14. If you are under the age of 14 and you want to use our services, please rely on a parent or guardian to assist you.

If a child under the age of 14 may have disclosed Personal Data to us, the parent or guardian can contact us and we will remove Personal Data if required.

3. WHAT PERSONAL DATA DO WE COLLECT?

In the course of its business activities and providing the services, GoodCang will need to process Personal Data. Without your Personal Data, we will not be able to provide you with the requested services. As a rule, the Personal Data that you provide directly or indirectly to GoodCang when using our services and visiting our Websites are:

- **Contact Information.** This includes your name, address, email address and telephone number;
- **Financial Information.** This includes your bank account number, payment status and invoices;
- **Identification Information.** This may include your ID number, password number or driver's license number, which ensures that we can identify you;
- **Account Information.** This includes login information, including your user name, email address, telephone and other information provided through your account;
- **Shipper's Information.** This includes shipper's name, address, email address and telephone number;
- **Recipient's Information.** This includes recipient's name, address, email address and telephone number;
- **User Data and Preferences.** This includes, where applicable, shipment volumes, complaints, transaction history and related commercial activity, communications, survey information, and your preferences.
- **Automatically generated information.** This includes IP address, unique device or user ID, system and browser type, date and time stamp, referring website address, content and pages you accessed on our websites or mobile applications, date, time and location actions.

In addition to the above categories of Personal Data, depending on your interaction with GoodCang, we may collect other types of information which may or may not contain Personal Data. Such information related to shipments and services may include shipment tracking number, shipment routing

information, location data, status of a shipment, delivery location, packaging type, number of pieces, weight, prices, picture of the parcel, proof of delivery and customs information.

4. HOW DE WE COLLECT PERSONAL DATA?

GoodCang collects Personal Data when it is provided by the shipper or our contractual customer or by a visitor to our website. If you are the shipper or our contractual customer, then we receive your Personal Data directly from you. Examples of situations where GoodCang collects Personal Data directly are:

- The name, address, and phone number of a person tendering the shipment listed as the shipper.
- The name, address, identity information, payment card information, and account number of a person who opens a GoodCang shipping account, namely our our contractual customer.

If the shipper or our contractual customer provides Personal Data of others, then we receive that Personal Data indirectly. Examples of situations where GoodCang collects Personal Data indirectly are:

- The name, address, and phone number of the recipient of the shipment.
- The name, address, phone number, email address, identify information of the shipper or account holder's director, employees, workers or representatives.
- The actual shipper's name and address when the shipper places an order with an online market platform such as Amazon, ebay, Wish and GoodCang delivers the parcel to the address you provide.

When GoodCang receives Personal Data indirectly, we rely on the provider of the Personal Data for the accuracy of the information and that the provider has the authority to provide that information to GoodCang.

5. FOR WHICH PURPOSES AND ON WHAT GROUNDS DO WE PROCESS YOUR PERSONAL DATA?

Personal Data shall be collected, used, stored or otherwise processed when necessary within the framework of responsible, efficient and effective business management of GoodCang. GoodCang processes Personal Data based on applicable legal ground. The legal ground is often intrinsically linked to the business purpose. This means, for example, that the performance of an agreement can be both a legal ground and a business purpose for GoodCang. Therefore, we will first clarify the legal ground on which GoodCang processes your Personal Data and, subsequently, the business purpose that we use your Personal Data for:

Legal Grounds

In general, GoodCang processes your personal data on one of the following legal grounds:

- The processing is necessary to fulfill an agreement between you and GoodCang,
- The processing is necessary for us to comply with our legal obligations,
- The processing is necessary to protect your vital interests or those of another person,
- The processing is necessary for GoodCang's legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms, or
- where appropriate and necessary, we will ask for your consent.

Business Purposes

GoodCang collects, uses or processes personal data only where the processing falls within the scope of one (or more) of the legitimate business purposes listed below:

- Performing agreements. This includes shipping services, tracking GoodCang services, communication with our contractual customer, shipper and other parties regarding services, responding to requests for further information, dispute resolution and preparing agreements (e.g., link the shipment tracking number to your account to enable you to follow your shipment).
- Product development, research and improvement of GoodCang products and/or services. GoodCang processes Personal Data as necessary for the development and improvement of GoodCang products and/or services, research and development (e.g., analyze information related to the shipment and services to improve our services).
- Relationship management and marketing for commercial activities. In general, GoodCang processes Personal Data as necessary for the development and improvement of GoodCang products and/or services, account management, customer services and the performance of targeted marketing activities in order to establish a relationship with a customer and/or maintaining as well as extending a relationship with a customer or business partner and for performing analyses with respect to Personal Data for statistical purposes (e.g., send advertising, communications and content more specific to your interests to you).
- Business process execution, internal management and management reporting. This includes addressing activities such as managing company

assets, conducting internal audits and investigations, finance and accounting, implementing business controls, provision of central processing facilities for efficiency purposes, managing mergers, acquisitions and divestitures and Processing Personal Data for management reporting and analysis.

- Security and Protection . The processing of data for processes such as those related to safety, protecting GoodCang and its customers, or business partners, and authenticating the status and access rights (e.g. providing secure services for online and offline transactions) of customers or business partners.
- Protecting the vital interests of individuals. This includes processing data when necessary to protect your vital interests or those of other individuals (e.g., for urgent safety reasons).
- Compliance with legal obligations. This addresses the processing of Personal Data as necessary for compliance with laws and regulations to which GoodCang is subject (e.g., checking the names of customers and business partners against blacklists to avoid conflicts of interest, compliance with trade regulations , anti-money laundering and anti-corruption regulations and other policies, procedures and regulations).

6. HOW DO WE USE COOKIES?

GoodCang may use cookies and similar technologies on its Websites. Through these cookies, GoodCang automatically obtains Personal Data as listed above when you visit our Websites. To learn more about the cookies and similar technologies, please consult our Cookie Notice.

7. HOW DO WE SHARE YOUR PERSONAL DATA?

GoodCang shares your Personal Data with third parties in the following circumstances:

- Share your personal data within GoodCang's affiliates, operating groups, subsidiaries and divisions if such is necessary for the purposes as listed above.
- Our employees are authorised to access personal data only to the extent necessary to serve the applicable purpose and to perform their jobs.
- Share your personal data with data processors such as vendors or service providers processing Personal Data on our behalf. In such cases, these third parties only use your Personal Data for the purposes described above and only in accordance with our instructions. When these third parties are given access to your personal data, we will take the required

contractual, technical and organizational measures to ensure that your personal data are only processed to the extent that such processing is secured. The following third parties have access to your personal data, where relevant, for the provisioning of their products or services to us:

- Customs agency to perform customs formalities and declaration of your shipment.
- Last-mile delivery service provider to deliver the shipment to the destination you are expecting.
- IT services provider who develops, maintains our Websites and certain software.
- Cloud services provider: We may store data on servers operated by a cloud service provider to us. Regardless of where you use our online services or provide data to us, the data may be transferred to and maintained on servers located outside the country in which the data was collected.
- Law enforcement, regulators and other parties for legal reasons: We may also disclose your personal data to third parties as required by law, or if we reasonably believe that such action is necessary (a) to comply with a subpoena or other legal proceedings, legal actions or government agency requests; (b) when we believe in good faith that a disclosure is necessary to comply with the law and the reasonable requests of law enforcement; (c) to protect and exercise our legal claims, rights and property; (d) to protect your rights, property or personal safety or that of others; and (e) to investigate fraud.

8. HOW ARE YOUR PERSONAL DATA SECURED?

We has taken adequate safeguards to ensure the confidentiality and security of your personal data. We have implemented appropriate technical, physical and organizational measures to protect personal data against accidental or unlawful destruction or accidental loss, damage, alteration, unauthorised disclosure or access as well as all other forms of unlawful processing (including, but not limited to, unnecessary collection) or further processing, including protecting your Personal Data against unauthorized access, maintaining the confidentiality, integrity and availability of your Personal data, and training personnel on information security requirements.

However, no security measure can guarantee against compromise. You also have an important role in protecting your Personal Data. You should not share your username and password with anyone, and you should not re-use

passwords across more than one website. If you have a reason to believe that your Personal Data has been compromised, please contact us.

9. HOW LONG ARE YOUR PERSONAL DATA RETAINED?

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means.

Under some circumstances we may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

10. WHERE DO WE STORE OR TRANSFER YOUR PERSONAL DATA?

Generally, the Personal Data with respect to you legally collected by GoodCang within the territory of the People's Republic of China will be stored in the territory of the People's Republic of China.

Due to the nature of our business and the services we provide to you, GoodCang may need to transfer your Personal Data to its affiliates or subsidiaries located outside the People's Republic of China in order to perform the agreements with you or achieve the purposes provided in this Statement. In any case where we transfer Personal Data, we shall ensure that such transfers are subject to appropriate safeguards not lower than the level of protection required by applicable laws in China. Before cross-border transmission or remote access, we will complete the corresponding procedures in accordance with the requirements of relevant personal data protection laws and regulations.

11. WHAT RIGHTS CAN YOU EXERCISE IN RELATION TO YOUR PERSONAL DATA?

Based on the law applicable to the use of your Personal Data, you may have rights that you can exercise in relation to your Personal Data. Note that in some cases we are not required to completely comply with your request, as such rights may be conditional or because we have to balance your rights against our rights and obligations to process your Personal Data and to protect the rights and freedoms of others. A number of the rights you have in relation to your Personal Data, as applicable in the European Economic Area, the State

of California, or other US or international geographic jurisdictions, are explained below:

Right of access

You may be entitled to a copy of the Personal Data we hold about you and to learn details about how we use it. Your Personal Data will usually be provided to you digitally. We may require you to prove your identity before providing the requested information.

Right to rectification

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you believe this is not the case, you may have the right to request that any incomplete or inaccurate Personal Data that we process about you is amended.

Right to erasure

You may have the right to ask us to erase your Personal Data, for example where the Personal Data we collected is no longer necessary for the original purpose, where Personal Data has become obsolete or where you withdraw your consent (if we are processing your Personal Data based on consent). However, this will need to be balanced against other factors. For example, we may not be able comply with your request due to certain legal or regulatory obligations.

Right to restriction of processing

You may be entitled to ask us to (temporarily) stop using your Personal Data, for example where you think that the Personal Data we hold about you may be inaccurate or where you think that we no longer need to use your Personal Data.

Right to data portability

You may have the right to ask that we transfer Personal Data that you have provided to us to a third party of your choice. This right can only be exercised when you have provided the Personal Data to us, and when we are processing that data by automated means on the basis of your consent or in order to perform our obligations under a contract with you.

Right to object

You may have the right to object to processing which is based on our legitimate interests. In case of the processing of Personal Data for marketing purposes, you have the right to object at any time. When you ask us to stop using your Personal Data for marketing purposes, GoodCang will immediately cease to use your Personal Data. For other purposes based on our legitimate interests, we will no longer process the Personal Data on that basis when you

file an objection based on your grounds relating to your particular situation, unless we have a compelling legitimate ground for the processing. Note, however, that we may not be able to provide certain services or benefits if we are unable to process the necessary Personal Data for that purpose.

Rights relating to automated decision-making

You may have the right not to be subjected to automated decision-making, including profiling, which produces legal effect for you or has a similar significant effect. If you believe you have been subject to an automated decision and do not agree with the outcome, you can contact us using the details below and ask us to review the decision.

Right to withdraw consent

We may ask for your consent to process your Personal Data in specific cases. When we do this, you have the right to withdraw your consent at any time. GoodCang will stop the further processing as soon as possible after the withdrawal of your consent. However, this does not affect the lawfulness of the processing before consent was withdrawn.

12. CALIFORNIA CONSUMERS

If you are a California resident, you can make certain requests regarding your Personal Data. We will fulfill each of these requests per the requirements of California law.

- You can request access to a copy of the Personal Data we have about you, including a list of categories of your Personal Data that we have sold and a list of categories of your Personal Data that we have shared with another company for a business purpose.
- You can request that we delete your Personal Data.
- You can request that we stop selling your Personal Data.

More information on each of these requests is below.

Request access to Personal Data

If you make this request, which we also refer to as a Request to Access Information, we will return to you (to the extent required by law):

- The categories of Personal Data we have collected about you.
- The categories of sources from which we collect your Personal Data.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we share Personal Data.
- The specific pieces of Personal Data we have collected about you.

- A list of categories of Personal Data that we have sold, along with the category of any other company we sold it to. Any of the categories of Personal Data that we collect could be included in a sale to other companies, including those within our corporate family. If we have not sold your Personal Data, we will inform you of that fact.
- A list of categories of Personal Data that we have disclosed for a business purpose, along with the category of any other company we shared it with.

You can ask us to provide you with this information up to two times in a rolling twelve-month period. When you make this request, the information provided may be limited to Personal Data we collected about you in the previous 12 months.

Delete the Personal Data

You have the right to ask that we delete your Personal Data. Once we receive a request, we will delete the Personal Data (to the extent required by law) we hold about you as of the date of your request from our records and direct any service providers to do the same. In some cases, deletion may be accomplished through de-identification of the information. Choosing to delete your Personal Data may impact your ability to use our websites and online features, including closure of your online account.

Stop Selling the Personal Data

In the twelve months prior to the effective date of this Statement, we has not sold any personal information of consumers, as those terms are defined under the California Consumer Privacy Act.

No Discrimination

We will not discriminate against you for exercising your rights. This generally means we will not deny you using our services, provide a different level or quality of our services. Please know, if you ask us to delete your information, it may impact your experience with us, and you may not be able to participate in certain services which require usage of your Personal Data to function.

Shine the light law

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal data (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in

writing to us using the contact information provided at the top of this Privacy Statement.

13. WHAT IF YOU HAVE OTHER QUESTIONS OR COMPLIANS?

Questions or complaints regarding the processing of your Personal Data can be directed to GoodCang by using the contact information as provided at the top of this Privacy Statement.

You also have the right to lodge a complaint with the competent data protection authority in the jurisdiction where you work, where you live or where an alleged infringement takes place.

14. HOW WILL THIS PRIVACY STATMENT BE UPDATED?

GoodCang may update this Privacy Statement from time to time. If an amendment will have a serious impact, GoodCang will endeavor to actively inform you about such amendments. GoodCang will publish an up-to-date Privacy Statement on the Websites at all times indicating the latest amendments.

历史记录

[个人信息保护政策 V3.0](#)