



Third Party Due Diligence Privacy notice

English	2
Chinese	5



English - Third Party Due Diligence Privacy Notice

The companies belonging to the Spectris Group (referred to in this Privacy Notice as “Spectris”, “we”, “us”, “our”) take privacy serious. We see it as our duty of care to protect your personal data and to ensure that all personal data is used in accordance with applicable data protection laws.

This Privacy Notice explains what kind of personal data is collected and how it is being used in view of our third-party due diligence process. Part of Spectris’ values is acting with absolute integrity and conducting business in an ethical way. Spectris only wants to engage third parties that are trustworthy and for that purpose subjects third parties to a due diligence process on a case by case basis. This is not new. In the past, Spectris performed this due diligence process mostly manually and now we want to automate parts of the due diligence process and for that purpose, will use a screening tool.

This Privacy Notice may be changed over time and was last changed in May 2021. The most up-to-date- Privacy Notice is published on the Spectris website.

For further information on who we are, please click on the relevant company logo.

Who is responsible for the personal data?

Spectris Plc is the company determining the outset of the due diligence process and the configuration of the screening tool for the entire Spectris Group. As such, Spectris Plc also maintains the screening tool. Together with Spectris Plc, the specific Spectris company with whom you intend do enter into a business relationship (“Spectris Operating Company”) will be responsible for the processing of personal data as described in this Privacy Notice. Both entities will act as controller within the meaning of the applicable data protection laws. If you have any questions regarding this Privacy Notice, our use of your personal data or your rights in relation to your personal data, you can contact us via data.protection@spectris.com. This account is monitored by the Spectris Group Privacy Counsel. If deemed necessary, your email will be forwarded to the relevant Spectris Operating Company.

For which purposes do we process personal data?

Spectris has implemented a due diligence process to allow Spectris to take informed decisions about the potential risks presented by third parties we consider conducting business with. Personal data is processed for this purpose. By implementing a due diligence process Spectris aims to minimize the risks of acting in breach of its own Code of Business Ethics and applicable laws and regulations.

What does the processing of personal data with the screening tool specifically entail?

The screening tool that Spectris has implemented in the context of the due diligence process, allows us to screen an individual or company against - structured and unstructured - publicly available information which is amongst others included in watch (and sanctions) lists, public registers, regulatory sources, media and other legal sources (such as published court cases).

The publicly available information sources against which the screening takes place may include criminal information if your company or the individuals related to your company have a criminal history.

On what basis do we process personal data?

We process personal data in the context of the due diligence process to ensure our compliance with applicable laws and on the basis of our legitimate interest to ensure that we only conduct business with trustworthy third parties that meet our company standards. Our company standard follows directly from our Code of Business Ethics.

Which personal data do we process?

In the context of the due diligence process, we might process the following personal data:

1. We use your contact details such as first name, last name and email address to send you our due diligence questionnaire and to communicate with you in relation to the completion of our due diligence.
2. In the due diligence questionnaire, we may for example ask for:
 - a. names of the owners of your company, members of the board of directors, CEO, CFO and COO.
 - b. evidence of existence and registration, which incorporation documents may include personal data like name, date of birth and home addresses.
 - c. Details and copy of relevant licenses or permits required to conduct business with us. These may include picture, name and date of birth.

We encourage you to remove or strike through any personal data irrelevant for the verification of your company's registration or for our verification of your license or permit (which, depending on the specific circumstances, may for example be home addresses).

3. We may screen companies we consider conducting business with and our screening tool shows records found of the company screened, including the individuals affiliated with that company, such as CEO's or CFO's, if such information is indeed publicly available.
4. If we deem it required for the purposes mentioned above, we may screen an individual related to your company in our screening tool. For this, we process first name and last name and to the extent available to us other personal data that can eliminate you from the positive hits provided by our screening tool, such as middle name, alias(es), email address, date of birth, gender, job title, employer, address details, country of citizenship and exceptionally social security number or tax ID (and the latter numbers only to the extent allowed by the applicable laws).

For how long do we retain personal data?

Personal data processed in the context of the due diligence process will generally be retained by us for the duration of three years after (a) the decision to not enter into a relationship; or (b) the end of the business relationship with the third party. Personal data may be retained longer than the retention period if legal or regulatory requirements so dictate or if such longer retention is required in case of a (potential) legal dispute.

Who has access to personal data?

Access to personal data within the Spectris Group

The personal data will be available within the Spectris Operating Company you do business with, to only those who need access to the data and only to the extent necessary to meet the purposes specified above. We will take appropriate measures to ensure that your personal data is appropriately safeguarded.

The personal data may also be accessed by individuals within Spectris who are tasked with a compliance function, for example for further review of the answers provided in the due diligence questionnaire, or for maintaining the screening tool. These individuals are subject to confidentiality obligations and trained in data protection. Further sharing of the personal data within Spectris will solely be performed if and to the extent required for the purposes set forth above.

Spectris runs a group wide data protection compliance program and has filed for Binding Corporate Rules, meaning that your personal data exchanged within the Spectris Group is treated with the same degree of care – regardless of where processing takes place – as long as your data is transferred within the Spectris Group.

Access to your personal data by third parties

The personal information is foremost intended for our internal business process in deciding whether to enter into a business relationship with you or the company you work for. This means it is an internal process, but we use a cloud-based system offered by a third party as a screening tool. We may also occasionally decide to outsource due diligence to a third party or we may need to comply to governmental and regulatory bodies and other third parties to whom we must disclose information under applicable law, such as to comply with a court order or a request from a regulator or similar legal process, or otherwise where necessary to comply with a legal obligation or for the administration of justice. If required, we may share the personal data with our professional advisors, for example in the event of a dispute or legal matter.

Where third parties are given access to personal data, we will take the necessary contractual, technical and organisational measures.

If your personal data is transferred to a recipient in a country outside the European Economic Area that does not provide an adequate level of protection for personal data, we will provide for appropriate safeguards, for example conclude a contract encompassing the standard data protection clauses adopted by the European Commission with the relevant third party. A copy of such contract or more information about the appropriate safeguards taken to enable the transfer of personal data, can be obtained upon request via data.protection@spectris.com

Personal data obtained from third parties

We work closely with third parties (including business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics and search information providers) and may receive personal data about you from them. Such data obtained from third parties will be kept in accordance with the same duty of care as described in this Privacy Notice, and with any additional restrictions imposed by the third party that shared your personal data.

Your Rights

You have a number of rights under applicable data protection law in respect of our processing of your personal data. These include:

- the right to request access to your personal data;
- the right to request rectification of any personal data that we hold;
- subject to certain conditions:
 - the right to request erasure of your personal data;
 - the right to request restriction of processing of your personal data;
 - the right to have your personal data transferred to another controller;
- where we rely on your consent for processing, the right to withdraw such consent; and
- the right to lodge a complaint with a data protection authority. In the UK, this is the [Information Commissioner's Officer \(ICO\)](#). A list of European authorities can be found via this link: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080



Chinese - Third Party Due Diligence Personal Information Notice

第三方尽职调查个人信息通知

The companies belonging to the Spectris Group (referred to in this Personal Information Notice as “Spectris”, “we”, “us”, “our”) take the personal information serious. We see it as our duty of care to protect your personal information and to ensure that all personal information is used in accordance with applicable data protection laws.

思百吉集团旗下各公司（在本个人信息通知中，称为“思百吉”、“我们”、“我们的”）重视个人信息。我们将保护您的个人信息及确保所有对于个人信息的使用符合适用的数据保护法律作为我们的注意义务。

This Personal Information Notice explains what kind of personal information is collected and how it is being used in view of our third-party due diligence process. Part of Spectris’ values is acting with absolute integrity and conducting business in an ethical way. Spectris only wants to engage third parties that are trustworthy and for that purpose subjects third parties to a due diligence process on a case by case basis. This is not new. In the past, Spectris performed this due diligence process mostly manually and now we want to automate parts of the due diligence process and for that purpose, will use a screening tool.

本个人信息通知旨在说明在我们的第三方尽职调查程序中会收集何种个人信息以及如何使用这些个人信息。坚持绝对的诚信行事以及以合乎道德的方式经营业务是思百吉价值观的重要组成。思百吉仅有意与值得信赖的第三方合作，为此，思百吉在个案中对第三方进行尽职调查。尽职调查程序并非新的要求，过去，思百吉主要通过人工形式执行该等尽职调查程序，而现在，我们希望将部分尽职调查程序自动化，为此目的我们将使用一项筛查工具。

This Personal Information Notice may be changed over time and was last changed in May 2021. The most up-to-date- Personal Information Notice is published on the Spectris website.

本个人信息通知可能会随时间而更改，最近一次修改于 2021 年 5 月。最新版本的个人信息通知将发布于思百吉网站。

For further information on who we are, please click on the relevant company logo.

如果您有意进一步了解我们，请点击相关的公司徽标。

Who is responsible for the personal information?

谁将对个人信息负责？

Spectris Plc is the company determining the outset of the due diligence process and the configuration of the screening tool for the entire Spectris Group. As such, Spectris Plc also maintains the screening tool. Together with Spectris Plc, the specific Spectris company with whom you intend do enter into a business relationship (“Spectris Operating Company”) will be responsible for the processing of

personal information as described in this Personal Information Notice. Both entities will act as controller within the meaning of the applicable data protection laws. If you have any questions regarding this Personal Information Notice, our use of your personal information or your rights in relation to your personal information, you can contact us via data.protection@spectris.com. This account is monitored by the Spectris Group Privacy Counsel. If deemed necessary, your email will be forwarded to the relevant Spectris Operating Company.

Spectris Plc 是整个思百吉集团尽职调查程序起始与筛查工具配置的决定者。同样，Spectris Plc 也会负责维护筛查工具。您希望与之建立业务关系的特定思百吉公司（“思百吉运营公司”）将与 Spectris Plc 共同对本个人信息通知所述的个人信息处理负责。在所适用的数据保护法项下，两家主体将作为控制者。如果您对本个人信息通知、我们对于您个人信息的使用或您拥有的与您的个人信息相关的权利有任何疑问，您可以通过 data.protection@spectris.com 与我们联系。该账户由思百吉集团隐私法务负责监察。如有必要，您的电子邮件将转发至相关的思百吉运营公司。

For which purposes do we process personal information?

我们处理个人信息出于何种目的？

Spectris has implemented a due diligence process to allow Spectris to take informed decisions about the potential risks presented by third parties we consider conducting business with. Personal information is processed for this purpose. By implementing a due diligence process Spectris aims to minimize the risks of acting in breach of its own Code of Business Ethics and applicable laws and regulations.

为使思百吉能够就我们考虑与之开展业务的第三方可能带来的风险做出明智的决定，思百吉已经实施了一项尽职调查程序。对个人信息的处理正是为此目的。通过实施尽职调查程序，思百吉意图最大程度地降低违反自身《商业道德行为准则》及适用法律法规的风险。

What does the processing of personal information with the screening tool specifically entail?

使用筛查工具处理个人信息具体涉及哪些方面？

The screening tool that Spectris has implemented in the context of the due diligence process, allows us to screen an individual or company against - structured and unstructured - publicly available information which is amongst others included in watch (and sanctions) lists, public registers, regulatory sources, media and other legal sources (such as published court cases).

在尽职调查程序项下，思百吉所采用的筛查工具使得我们能够根据公开可查的结构化或非结构化信息对某一个人或公司进行筛查，前述公开可查的信息指在监视名单（以及制裁名单）、公共登记册、监管信息源、媒体及其他合法信息源（例如公开的诉讼案件）中包括的信息。

The publicly available information sources against which the screening takes place may include criminal information if your company or the individuals related to your company have a criminal history.

如果贵司或与贵司有关的个人存在犯罪记录，则筛查所涉的公开可查的信息源可能包括犯罪信息。

On what basis do we process personal information?

我们在何种基础上处理个人信息？

We process personal information in the context of the due diligence process to ensure our compliance with applicable laws and on the basis of our legitimate interest to ensure that we only conduct

business with trustworthy third parties that meet our company standards. Our company standard follows directly from our Code of Business Ethics.

我们在尽职调查程序中处理个人信息，旨在确保我们遵守适用的法律，同时系基于我们确保仅与达到我司标准的值得信赖的第三方开展业务的合法利益。我司标准直接源于我们的《商业道德行为准则》。

Which personal information do we process?

我们处理哪些个人信息？

In the context of the due diligence process, we might process the following personal information:

在尽职调查程序的过程中，我们可能会处理以下个人信息：

5. We use your contact details such as first name, last name and email address to send you our due diligence questionnaire and to communicate with you in relation to the completion of our due diligence.

我们使用您的联系方式（例如名字，姓氏及电子邮件地址）向您发送我们的尽职调查问卷，并在完成尽职调查的过程中与您进行沟通。

6. In the due diligence questionnaire, we may for example ask for:

在尽职调查问卷中，我们可能索取下述信息或材料，例如：

- d. names of the owners of your company, members of the board of directors, CEO, CFO and COO.

贵司的所有者、董事会成员、首席执行官、首席财务官及首席运营官的姓名。

- e. evidence of existence and registration, which incorporation documents may include personal information like name, date of birth and home addresses.

可能包括姓名、出生日期、家庭住址等个人信息的存续和注册证明及公司设立文件。

- f. Details and copy of relevant licenses or permits required to conduct business with us. These may include picture, name and date of birth.

为与我们开展业务之目的所需的相关许可或批准的详细信息及其副本。其中可能包括照片、姓名及出生日期。

We encourage you to remove or strike through any personal information irrelevant for the verification of your company's registration or for our verification of your license or permit (which, depending on the specific circumstances, may for example be home addresses).

我们鼓励您移除或删除任何与核实贵司的注册无关的，或与我们核实您的许可或批准无关的个人信息（视具体情况而定，例如某些情形下的家庭地址）。

7. We may screen companies we consider conducting business with and our screening tool shows records found of the company screened, including the individuals affiliated with that company, such as CEO's or CFO's, if such information is indeed publicly available.

我们可能会对我们考虑与之开展业务的公司进行筛查，我们的筛查工具会显示查找到的被筛查公司的记录，包括与该等公司存在关联的个人（例如首席执行官或首席财务官，如该信息确实公开可查）的记录。

8. If we deem it required for the purposes mentioned above, we may screen an individual related to your company in our screening tool. For this, we process first name and last name and to the extent available to us other personal information that can eliminate you from the positive hits provided by our screening tool, such as middle name, alias(es), email address, date of birth, gender, job title, employer, address details, country of citizenship and exceptionally ID card number or passport number code (and only to the extent allowed by the applicable laws).

如果我们认为系为上述目的所必须，我们可能在我们的筛查工具中筛查与贵司相关的个人。因此，为将您从我们的筛查工具提供的适格查询结果中排除，我们会处理名字、

姓氏以及我们可查范围内的其他信息，包括中名、别名、电子邮件地址、出生日期、性别、职位、雇主、详细地址、国籍国以及在特殊情形下的身份证号码或护照号码（该等号码仅在适用法律允许的范围内）。

For how long do we retain personal information?

我们将保存个人信息多长时间？

Personal information processed in the context of the due diligence process will generally be retained by us for the duration of three years after (a) the decision to not enter into a relationship; or (b) the end of the business relationship with the third party. Personal information may be retained longer than the retention period if legal or regulatory requirements so dictate or if such longer retention is required in case of a (potential) legal dispute.

就在尽职调查程序项下处理的个人信息，我们通常会在下述时点之后保存三年：（a）决定不建立业务关系；或（b）与第三方的业务关系终止。如果法律或监管部门另有要求或为（潜在的）法律争议所必须，我们可以在前述保存期限后继续保存个人信息。

Who has access to personal information?

谁有权访问个人信息？

Access to personal information within the Spectris Group

思百吉集团内部对个人信息的访问

The personal information will be available within the Spectris Operating Company you do business with, to only those who need access to the personal information and only to the extent necessary to meet the purposes specified above. We will take appropriate measures to ensure that your personal information is appropriately safeguarded.

在与您发生业务往来的思百吉运营公司内部，仅限于需要访问个人信息的人员可以仅在为满足上述目的需要的范围内访问个人信息。为确保您的个人信息得到适当的保护，我们将采取适当的措施。

The personal information may also be accessed by individuals within Spectris who are tasked with a compliance function, for example for further review of the answers provided in the due diligence questionnaire, or for maintaining the screening tool. These individuals are subject to confidentiality obligations and trained in data protection. Further sharing of the personal information within Spectris will solely be performed if and to the extent required for the purposes set forth above.

在思百吉内部，负责合规职能的人员同样可能访问个人信息，例如，为对尽职调查问卷的答案进行进一步复核，或为对筛查工具进行维护。该等人员负有保密义务且曾接受数据保护方面的培训。当且仅当为上述目的所必须时，个人信息将在思百吉内部进行进一步的共享。

Spectris runs a group wide data protection compliance program, meaning that your personal information exchanged within the Spectris Group is treated with the same degree of care – regardless of where processing takes place – as long as your personal information is transferred within the Spectris Group.

思百吉在全集团范围内实施数据保护合规程序，这意味着，无论对个人信息的处理发生在何处，只要您的个人信息还在思百吉集团内部传输，您的个人信息将会受到同等审慎程度的对待。

Access to your personal information by third parties

第三方对您个人信息的访问

The personal information is foremost intended for our internal business process in deciding whether to enter into a business relationship with you or the company you work for. This means it is an internal process, but we use a cloud-based system offered by a third party as a screening tool. We may also occasionally decide to outsource due diligence to a third party or we may need to comply to governmental and regulatory bodies and other third parties to whom we must disclose information under applicable law, such as to comply with a court order or a request from a regulator or similar legal process, or otherwise where necessary to comply with a legal obligation or for the administration of justice. If required, we may share the personal information with our professional advisors, for example in the event of a dispute or legal matter.

个人信息的首要用途是在我们的内部业务流程中用以决定是否与您或您供职的公司建立业务关系，因此这是一项内部流程，尽管如此，我们会采用第三方提供的基于云端的系统作为筛查工具。我们可能会不时决定向第三方外包尽职调查，或者我们可能需要依据适用法律服从政府和监管机构及其他第三方的要求而披露信息，例如，为遵守法院命令、监管机构要求或者类似的法律程序，或为遵守法律义务或为执法所必要。如有需要，例如在出现争议或法律问题时，我们可能会与我们的专业顾问分享人信息。

Where third parties are given access to personal information, we will take the necessary contractual, technical and organisational measures.

如果我们允许第三方访问个人信息，我们将采取必要的合同、技术及组织架构措施。

If your personal information is transferred to a recipient in a country outside the People's Republic of China that does not provide an adequate level of protection for personal information, we will provide for appropriate safeguards.

如果您的个人信息被转移到位于中华人民共和国以外的其他国家的接收者处，且该接收者未提供思百吉认为足够等级的个人信息保护的，我们将提供适当的保护。

Personal information obtained from third parties

从第三方处获得的个人信息

We work closely with third parties (including business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics and search information providers) and may receive personal information about you from them. Such information obtained from third parties will be kept in accordance with the same duty of care as described in this Personal Information Notice, and with any additional restrictions imposed by the third party that shared your personal information.

我们与第三方（包括商业合作伙伴、技术、付款及交付服务的分包商、广告网络、分析及搜索信息供应商）紧密合作，且可能从该等第三方处接收与您有关的个人信息。从第三方获得的此类信息将按照与本个人信息通知中所述相同程度的谨慎义务进行保管，并将受限于向我们分享您的个人信息的第三方所施加的任何额外限制。

Personal information of third parties provided by you

您提供的第三方个人信息

If you provide the personal information of any third party to us for the purpose of Spectris's due diligence process, you undertake that you have obtained the consent of that third party on your provision of his/her personal information to us and our processing of his/her personal information in accordance with this Personal Information Notice.

如您为思百吉的尽职调查程序之目的向我们提供任何第三方的个人信息的，您承诺您已经取得该第三方对于您向我们提供个人信息及对于我们依据本个人信息通知处理其个人信息的同意。

Your Rights

您的权利

You have a number of rights under applicable data protection law in respect of our processing of your personal information. These include:

关于我们对您个人信息进行的处理，您在适用的数据保护法下拥有多项权利，包括：

- the right to request access to your personal information;
要求访问您的个人信息的权利；
- the right to request rectification of any personal information that we hold;
要求更正我们持有的任何个人信息的权利；
- subject to certain conditions:
受限于特定条件：
 - the right to request erasure of your personal information;
要求删除您的个人信息的权利；
 - the right to request restriction of processing of your personal information;
要求就对您的个人信息的处理进行限制的权利；
 - the right to have your personal information transferred to another controller;
将您的个人信息与其他控制者共享的权利；
- the right to lodge a complaint with competent authorities.
向相关主管部门投诉的权利