

Employee Privacy Notice

This Employee Privacy Notice (“**Notice**”) describes how Princeton (Beijing) Consulting Co., Ltd. (“**PU China**”, “**we**”, “**us**” or “**our**”, also known as Princeton China Center) collects and processes the personal information of its employees and interns (“**you**”) in accordance with applicable data privacy laws in China, whether electronically or manually.

We may update or change this Notice at any time to reflect changes in our privacy practices or applicable laws and regulations, and will timely publish the updated version on <https://chinacenter.provost.princeton.edu/>. In the event that the changes to this Notice will have a fundamental impact on our processing of your personal information or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to restrict our processing).

1. COLLECTION OF PERSONAL INFORMATION

Personal information is any information that, recorded by electronic or other means, personally identifies you or from which you could be identified. We may collect personal information about you from a variety of sources, including from you directly and from third-party vendors.

1.1 Information we may collect directly from you

We may collect directly from you the personal information in the course of your application/recruitment and onboarding and our human resources management, including but not limited to the following:

- (a) basic personal information: name, date of birth, gender, ethnicity, nationality, place of birth, photograph, marital status, current address, cell phone number, mailing address, e-mail address, bank account information, etc.;
- (b) information contained in your resume or CV, and other documents related to the application/recruitment and onboarding process, e.g. proof of your identity (such as ID or passport (if any) as evidence of the right to work in China), health and medical information, company affiliation and work experience such as previous position(s) and employer(s), records of performance and appraisals;
- (c) educational details and documentary evidence of any relevant qualifications (e.g. major studied, year of graduation, degree(s), transcripts, educational history, qualifications, certifications, skills);
- (d) information about family members and dependants (e.g., marriage certificate and spouse information, childbirth certificate and information, and emergency contact information);
- (e) information about your health (e.g. any health issues or disability information, such as biometric information, health insurance records, social security card, and social insurance card number, etc.);
- (f) information generated in connection with your employment by PU China (e.g., absence information, performance information, credentials to access any Princeton University (the “**University**” or “**PU**”) or PU China internal computer system or database, etc.);

- (g) all and any information required by applicable law or governmental authorities; and
- (h) all and any other information you may choose to submit directly or indirectly to us.

1.2 Information we may collect from other sources

We may also collect personal information about you from other sources, including the following:

- (a) background check information (e.g., the reference letter) from third-party background check agencies;
- (b) information from your current or prior employers; and
- (c) all and any information required by applicable law or governmental authorities.

1.3 Purpose of collecting the foregoing information

We may collect the above mentioned personal information about you for human resource management purposes and to enable you to perform your administrative responsibilities, including but not limited to the following:

- (a) job application and recruitment: including but not limited to the interview, background checks and other investigative inquiries, travel, job offer, and the execution of your employment contract;
- (b) fulfillment of our contractual/legal obligations to you in connection with applicable employment laws and regulations and any employment contracts with us, including but not limited to the following:
 - provision of salaries, bonuses, allowances, business insurance, and other benefits;
 - paying social security and performing the tax returns;
 - protection of your life, health, and other interests in the course of work;
 - archival of documents and records in accordance with our internal policy or applicable laws and regulations to which we are subject;
 - any other purposes as may be agreed to between you and PU China, including the purposes set out in the employment contract; and
 - compliance with regulatory obligations to which we are subject, including those relating to any inquiries, actions, investigations, audits, or proceedings.
- (c) administrative responsibilities and management, including but not limited to:
 - internal communication, attendance management, leave application;
 - IT support, including reasonable access to work phones, work mailboxes, work computers, and work areas;

performance evaluation and remuneration related assessment, including promotions, training, transfers, eligibility check for salaries/bonuses and other benefits, and other career development activities;

travel or accommodation arrangements where necessary, e.g., for assisting with the visa application;

internal investigation of potentially illegal activities in violation of applicable laws and regulations or our internal rules and policies;

security maintenance, including activities to ensure the security of premises, facilities, information, and individuals.

- (d) reporting and compliance purposes; and
- (e) any other purpose related to any of the foregoing purposes, and any other purpose permitted or required by applicable laws.

For certain sensitive personal information, such as race/ethnic origin, medical/health information, biometric identification, specific identity, financial account, whereabouts and location tracks, as well as the personal information of minors under the age of 14, we will only process such information in the limited circumstance based upon your separate consent as required by applicable laws and regulations, unless other legal bases are provided thereunder for us to collect and process your sensitive personal information without your consent.

Specifically:

- (a) we may process your ID card/visa/passport information to determine your eligibility for the position and/or to assist you with applying for a visa or passport;
- (b) we may process your medical or health information for sick leave management/insurance purposes, to determine if you need any work adjustments and/or to provide any medical care to you, etc.;
- (c) we may process the personal information of your dependents under the age of 14 for the provision of health insurance and other employment-related benefits;
- (d) we may process any disability information you provide directly or indirectly or we obtain about you about you for providing you with beneficial medical care and/or promoting equality following the University's equality and diversity policy;
- (e) we may process other sensitive personal information at your request.

2. TRANSFER OF PERSONAL INFORMATION

We may share your personal information with Princeton University, Princeton International LLC (our parent company), and third-parties that cooperate with Princeton University or us, in or outside of China, if necessary for the above-mentioned purposes as permitted under applicable laws. These third-parties include but are not limited to IT system suppliers, payroll providers, insurers, legal counsels, and background check agencies. A list of PU's offices and third-party vendors engaged by PU or PU China that may receive your personal information, and respectively their contact information, the purposes and methods of their

personal information processing activities, the type of personal information they would receive is available upon request.

We would request your separate consent for the foregoing sharing of your personal information and have taken practicable steps to guard your personal information against any unauthorized, intentional, or accidental access, disclosure, modification, or destruction under such circumstances, per applicable legal requirements. In the event of an international transfer, we would pass the governmental security assessment, third-party certification or conclude a standard contract with the offshore recipient in addition to obtaining your separate consent, and ensure the personal information protection level of such offshore recipient, as required by the applicable laws and regulations.

In certain circumstances, we would have to share your personal information (e.g., birth date, mailing address, personal ID number, telephone number, date employed, position held, salary information, etc.) to cooperate with governmental agencies, courts, or other public bodies for your benefit or to perform our obligations under the applicable laws and regulations, and keep such provision of your personal information confidential when required by the foregoing bodies.

3. EXERCISE OF DATA SUBJECT RIGHTS

Under the applicable laws and regulations, you have the following rights unless otherwise provided under the applicable laws and regulations to which we are subject:

- (a) request us to explain the rules applicable to how we process your personal information;
- (b) request access to your personal information that we hold about you;
- (c) request a copy of personal information which is processed by us;
- (d) rectify any incorrect personal information that we hold about you;
- (e) object to, or request restrictions to, the processing of your personal information;
- (f) request the deletion of your personal information that is processed by us when:
 - the above-mentioned purposes have been achieved, cannot be achieved or your personal information is no longer necessary to achieve these purposes;
 - the employment contract between you and PU China is terminated unless we are required to retain your personal information thereafter under the applicable laws and regulations;
 - we are processing your personal information by consent and you withdraw that consent; or
 - we are processing your personal information unlawfully.
- (g) request us to transmit your personal information to a third party, provided certain regulatory conditions are met; and
- (h) any other rights that you may have under applicable laws and regulations.

For exercising any of the above rights, please contact us at princetonchinacenter@princeton.edu.

4. STORAGE AND RETENTION OF PERSONAL INFORMATION

We will take appropriate technical measures to protect the security of your personal information in the course of our processing and storage.

We will keep your personal information for the duration of the performance of your employment contract with PU China, or for an extended period thereafter where required or permitted by applicable laws and regulations. We will delete your personal information when it is no longer required for the above-mentioned purposes or permitted by applicable laws and regulations. If there is any personal information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the information.

5. PERSONAL INFORMATION OF OTHER PERSONS

Under certain circumstances, you may be requested to provide personal information about your family members or other individuals, including for emergency contact purposes and for providing our benefit programs to such individuals. You undertake to ensure that such individuals have consented to the disclosure of their personal information by you to us for the indicated purposes.

6. FAILURE TO PROVIDE PERSONAL INFORMATION

You can refuse to provide personal information to PU China. However, you understand that this is a necessary part of our recruitment and employee management. In the event that you refuse to provide us with the personal information we required, we may be unable to perform our obligations under your employment contract with us or the applicable laws and regulations.

Last updated: November 14, 2022.