



**Flender Ltd., China**  
**Notification on the Cross-border Transfer of Personal Information of**  
**Customer Contact Persons**

Dear Sir/Madam,

In accordance with the Cybersecurity Law of China, Data Security Law of China, Personal Information Protection Law of China and other relevant Chinese laws and regulations in connection with the cross-border transfer of personal information (“**Laws and Regulations**”), and for the purposes of implementing the compliance obligations in terms of the cross-border transfer of the personal information, Flender Ltd., China (“**Our Company**”) hereby issues this Notification to you as below.

The purpose of this Notification is to clearly inform you that what types of your personal information under what scenarios will be transferred to the German headquarters of Our Company, Flender GmbH (“**German Headquarters**”), the purposes and measures of processing your personal information, retention period, the impact to your rights and interests, your data subject rights, and the procedure of exercising your data subject rights.

- I. Based on the business relationship between your employer and Our Company, Our Company as the “Processor” of your personal information will use your personal information within the Flender Group in the scenarios described in this notification in accordance with German Headquarters’ global deployment and management requirements. In the view that Flender’s German Headquarters is located outside of China, your personal information may be transferred abroad.
- II. As the recipient of your personal information, the contact information of the German Headquarters is as follows:  
Name: Flender GmbH  
Head of Data Privacy  
Address: Alfred-Flender-Straße 77, 46395 Bocholt, Germany  
Email: [dataprivacy@flender.com](mailto:dataprivacy@flender.com)  
Telephone: 0049 2871 / 92 2782
- III. Details on cross-border transfer of your personal information
  1. Our Company and German Headquarters’ purposes of transfer your personal information abroad are for business development, sales management, PO management, due diligence on business partners, etc., including but not limited to:
    - a) Develop the market, make contact, and manage the business opportunities;
    - b) For the German Headquarters to implement a common marketing strategy, conduct international sales, or to market together with Our Company (e.g., for the German Headquarters to have meetings with the Chinese customer contact persons together with Our Company’s sales staff);
    - c) To conduct surveys with the customers to, for instance, improve the customers’ satisfaction;
    - d) For the German Headquarters to contact the Chinese contact persons and to build up a long-term relationship with the Chinese customers, as well as to seek co-development between Flender and the brands of customers’;
    - e) For the German Headquarters to review and manage the OP;
    - f) To conduct due diligence on the business partners.

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2. The ways of cross-border transfer include but not limited to:
  - a) Direct transfer abroad through Flender website;
  - b) Transfer to other data centers located outside of China, which support the application systems used by Flender Group, e.g., the CRM system like Salesforce;
  - c) Transfer to data centers located in China, but German Headquarters has access to the corresponding application systems used by the Company, e.g., SAP system;
  - d) Transfer directly to offshore affiliates of Flender Group via email or other ways.
3. Types of personal information that transferred abroad: your nationality, name, contact phone number, email, your company name and visit record, etc.

After being transferred abroad, your personal information is used by Our Company and the German Headquarters, or to the necessary extent shared within Flender group, only to the limit of the above purposes. Your personal information is not going to be analyzed to create your profile and used for automated decision making.

#### IV. Retention period after transferred abroad

Please inform us when you have position change, leave or retire from your employer. If your personal information is no longer necessary to be processed, we will, through the German Headquarters, delete your personal information or will stop processing your personal information except for taking secure storage measures.

#### V. Protection measures after the cross-border transfer of your personal information

After your personal information is transferred to the German Headquarters, the German Headquarters will take thorough technical measures and organizational measures to protect your information, according to the requirements of GDPR, the German data protection law, and Flender internal rules and agreements, including but not limited to:

- Your personal information is processed (including being provided to or shared with third parties) only to the extent of being necessary to realize the specific purposes.
- For the specific purposes, only the smallest scope of your personal information is to be processed.
- Subject to the level of sensitivity and the potential impact to your rights and interest, authentication, access control and anti-data leakage measures are taken to ensure the security, confidentiality and integrity of your personal information.
- The staff of German Headquarters who have access to your personal information receive trainings on data privacy and are bound by confidentiality obligations based on their employment relationship with the German Headquarters.
- German Headquarters has set up Data Privacy Organization and responsible person of data privacy (which is a part of legal Organization).
- German Headquarters has set up responsible person of information security.
- German Headquarters has formulated internal rules in accordance with the personal information protection requirements in GDPR and other German local legislations, requiring all the employees to enhance the awareness of personal information protection, and abide by the personal information processing rules.

#### VI. The provision to other third parties outside of China of your personal information by German Headquarters

As the recipient, instead of processing and using your personal information by itself, German Headquarters also shares your personal information within the Flender Group to the extent of necessity to realize the purposes as mentioned in this Notification (for example, to share your personal



information within Flender Group for implementing a global marketing strategy, to improve the sales management efficiency, to conduct co-marketing across different countries).

When sharing your personal information within the Group, the following mechanisms are taken by German Headquarters to safeguard the safety of your personal information:

Based on the requirements of GDPR, all Flender companies have signed an Intercompany Agreement on Data Processing (“ICA”), which provides the rights and obligations regarding data privacy of the parties when the personal information is shared among them. Such ICA can guarantee that the sub-recipient also complies with the common terms of the ICA and meets the data privacy common standard of EU when your personal information is shared by the German Headquarters with other Flender companies (on the basis of necessity).

You may find the regularly updated member list of Flender Group on Flender website.

#### VII. Your data subject rights

In the scenario of cross-border transfer of your personal information to the German Headquarters hereof, you are the Third-party Beneficiary. Under the Personal Information Protection Law of China, you have the rights to access, obtain the copy, supplement, make corrections, revise and request to delete your personal information, and you also have the right to request for illustration of the processing ways of your personal information.

Please be advised that as your personal information is being transferred to the German Headquarters on the basis of the necessary purposes as mentioned hereof and of the fact that the systems are directly located outside of China, therefore, once you require to delete your personal information or reject a specific cross-border transfer scenario, your employer may not be able to conduct business cooperations with Our Company and the German Headquarters.

#### VIII. The channel and procedure for your exercising your data subject rights

Should you have any question regarding the cross-border transfer of your personal information, or have any claim or complaint regarding your data subject rights, please contact Our Company and/or German Headquarters through the following channels:

Department: Legal & Compliance

Data Privacy Officer

Tele: 022-28402362

Email: [LC.FLC.cn@flender.com](mailto:LC.FLC.cn@flender.com)

Flender Ltd., China

July 1st, 2024