

Privacy Statement

This Policy applies only to the Success Factors Mobile App of SAP (China) Co., Ltd., (“SAP”) .

Last updated on: November, 2018

This Policy will help you understand the following:

1. How we collect and use your personal information.
2. How we use cookies and similar technologies.
3. How do we share, transfer the control of or disclose publicly your personal information.
4. How do we protect your personal information.
5. Your rights.
6. How do we process personal information of children.
7. How is your personal information transferred worldwide.
8. How is this Policy updated.
9. How you may contact us.

本政策仅适用于 SAP(中国)有限责任公司的 Success Factors Mobile App 产品。

最近更新日期：2018 年 11 月。

如果您有任何疑问、意见或建议，请通过以下联系方式与我们联系：

电子邮件：

本政策将帮助您了解以下内容：

- 1、我们如何收集和使用您的个人信息
- 2、我们如何使用 Cookie 和同类技术

3、我们如何共享、转让、公开披露您的个人信息

4、我们如何保护您的个人信息

5、您的权利

6、我们如何处理儿童的个人信息

7、您的个人信息如何在全球范围转移

8、本政策如何更新

9、如何联系我们

I. How We Collect And Use Your Personal Information

Protecting the individual's privacy on the Internet is crucial to the future of Internet-based business and the move toward a true Internet economy. We have created this Privacy Statement to demonstrate our firm commitment to the individual's right to data protection and privacy. This Privacy Statement outlines how we handle information that can be used to directly or indirectly identify an individual ("Personal Data")

Please note that SAP provides this mobile application so that our customer's users may access the SuccessFactors instance from their mobile phones. In these cases, our customer is the controller for many of the basic business functions, such as your registration data and profile information.

In addition to those business functions controlled by our customers, SAP will collect and use your personal data just for the following business purposes stated in this Policy:

- (1) **Track Usage Analytics** SAP collects the following information to track usage for analytics. Analytics help us understand how our product is used and make improvements.

To track this information we collect:

- a. Device model & type (e.g. iPhone, iPad, Android phone)
- b. OS version
- c. Country
- d. Time of access
- e. Company

- f. An ID that allows us to determine uniqueness but not to identify the user
- g. Time of access
- h. Feature accessed
- i. Action taken

Your provision of the above information means you authorize us to use them continuously throughout your use of this service. By agreeing to this Privacy Statement, you consent that the above information may be stored and processed outside of the People's Republic of China.

We do not associate any other personal information with the above categories. Consequently, we may not be able to delete your information on your request unless you can provide us the information in the above list that allows us to positively and conclusively identify you.

When we use the information for the purposes not covered by this Policy or our contracts with business entities responsible for your data, we will seek your consent in advance. When we use the information collected for certain purpose to serve other purposes, we will seek your consent in advance.

I. 我们如何收集和使用您的个人信息

保护个人在互联网上的隐私对于基于互联网的业务的未来以及迈向真正的互联网经济至关重要。我们创建了此隐私声明，以表明我们对个人数据保护和隐私权的坚定承诺。本隐私声明概述了我们如何处理可用于直接或间接识别个人的信息（“个人数据”）

请注意，SAP 提供此移动应用程序，以便我们客户的用户可以通过手机访问 SuccessFactors 软件。在这些情况下，我们的客户是许多基本业务功能的控制者，例如您的注册数据和用户资料信息。

除了我们客户控制的业务功能外，SAP 还将收集和使用您的个人数据，仅用于本隐私声明中所规定的以下业务目的：

（1）跟踪使用情况并进行数据分析。SAP 收集以下信息用于跟踪用户使用情况便于数据分析。分析可帮助我们了解产品的使用方式并进行改进。为了跟踪这些信息，我们收集：

- a. 设备型号和类型（例如 iPhone, iPad, Android 手机）

- b. 操作系统版本
- c. 国家
- d. 访问时间
- e. 公司
- f. 允许我们确定唯一性但不识别用户的 ID
- g. 访问时间
- h. 功能访问
- i. 所采取的行动

您提供上述信息意味着您授权我们在您使用本服务时允许我们持续性地使用您的个人信息。您一旦同意本隐私声明，即表示您同意您的上述信息可以在中华人民共和国境外存储和处理。

我们不会将您的任何其他个人信息与上述信息类别相关联。由此，我们可能无法响应您的请求删除您的个人信息，除非您能够向我们提供上述列表中的信息，以便我们根据您提供的信息能积极并最终地识别您的身份。

II. How Do We Use Cookies and Similar Technologies

(1) Cookie

To ensure normal operation of website, we will store a small data file named Cookie on your computer or mobile device. Cookie usually contains an identifier, website name and some numbers and characters. By using cookies, the website can store your data such as preferences. We will not use cookies for other purposes than those stated in this Policy. You may, based on your preferences, manage or delete the cookie. Refer to AboutCookies.org for more information. You may remove all the cookies stored on your device, and most of web browsers have a feature to block the cookie. If you do so, however, your need to change the user setting whenever you log on to our website.

(2) Do Not Track

Many network browsers have a Do Not Track feature, which may send a Do Not Track request to websites. We currently do not honor Do Not Track, but you can set your browser to refuse cookies. Please note that this may impair the functioning of the application in web view.

二、我们如何使用 Cookie 和同类技术

(1) Cookie

为确保网站正常运转，我们会在您的计算机或移动设备上存储名为 Cookie 的小数据文件。Cookie 通常包含标识符、站点名称以及一些号码和字符。借助于 Cookie，网站能够存储您的偏好等数据。

我们不会将 Cookie 用于本政策所述目的之外的任何用途。您可根据自己的偏好管理或删除 Cookie。有关详情，请参见 AboutCookies.org。您可以清除设备上保存的所有 Cookie，大部分网络浏览器都设有阻止 Cookie 的功能。但如果您这么做，则需要在每一次访问我们的网站时更改用户设置。

(2) 请勿追踪

很多网络浏览器均设有 Do Not Track 功能，该功能可向网站发布 Do Not Track 请求。我们目前不尊重 Do Not Track，但您可以将浏览器设置为拒绝 Cookie。请注意，这可能会影响 Web 视图中应用程序的功能。我们目前并不崇尚 Do Not Track 功能，但您可以将您的浏览器设置为拒绝接受 Cookie。但请您注意，这样的拒绝设置可能会影响您在浏览网页时应用程序的功能发挥。

III. How Do We Share, Transfer The Control Of Or Disclose Publicly Your Personal Information

(1) Sharing

We will not share your personal information with any company, organization or individual

beyond SAP, except for the following cases:

1. We may, in accordance with any applicable law and regulation or mandatory requirements of a competent authority, share your personal information with external organizations.

2. Suppliers, service providers and other partners. We send information to worldwide suppliers, service providers and other partners supporting our business, and the support includes providing technical and infrastructure services, analyzing the use pattern of our services, measuring the effectiveness of services, and providing customer services.

We will enter into a strict non-disclosure agreement or data processing agreement with companies, organizations and individuals with which we share personal information, requiring them to process personal information in accordance with our instructions, this Privacy Policy and any other relevant non-disclosure and security measures.

3. We hereby declare that this service is using a tracking pixel, agent or any other visitor identification technology that collects, uses, shares and stores data about your usage of this service with Flurry Analytics. Flurry's Privacy Policy is available at <https://privacy.oath.com>. You can learn more about your advertising choices by visiting: http://www.networkadvertising.org/managing/opt_out.asp or [https://policies.oath.com/us/en/oath/privacy/dashboard /](https://policies.oath.com/us/en/oath/privacy/dashboard/)

Your usage of this service with Flurry Analytics means that you agree to give your consents to use Flurry Analytics in this service.

(2) Transfer Of Control

We will not transfer the control of your personal information to any company, organization or individual, except where:

1. The transfer of control has had your explicit consent: After obtaining your explicit consent, we will transfer the control of your personal information to other parties.

2. In a merger or acquisition case or bankruptcy liquidation, involving the transfer of personal information, we will require new company or organization holding your personal information to observe this Privacy Policy, otherwise we will require such company or organization to seek your consent again.

(3) Public Disclosure

Only in the following cases, we will disclose your personal information publicly:

1. Having obtained your explicit consent.
2. Law-based disclosure: As required by applicable law, legal process, legal suits or in accordance with mandatory requirements of a competent authority, we may disclose your personal information publicly.

三、我们如何共享、转让、公开披露您的个人信息

1. 共享

我们不会与 SAP 以外的任何公司、组织和个人分享您的个人信息，但以下情况除外：

- 1)我们可以根据任何适用的法律法规或强制性规定， 主管当局的要求，与外部组织分享您的个人信息。
- 2)供应商、服务提供商和其他合作伙伴。我们将信息发送给在全球范围内支持我们业务的供应商、服务提供商和其他合作伙伴，这些支持包括提供技术基础设施服务、分析我们服务的使用方式、衡量服务的有效性、提供客户服务。

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或数据处理协议，要求他们按照我们的说明、本隐私政策以及其他任何相关的保密和安全措施来处理个人信息。

- 3) 我们特此声明该服务会使用 Flurry Analytics 跟踪像素，代理或任何其他访客识别技术来收集，使用，共享和存储有关您使用本服务的数据。您可在 <https://privacy.oath.com> 上查看到 Flurry 隐私政策。您也可以访问以下网址（<http> :

[//www.networkadvertising.org/managing/opt_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)) 或
[https://policies.oath.com/us/en/oath/privacy/dashboard /](https://policies.oath.com/us/en/oath/privacy/dashboard/)) 了解有关 Flurry 广告选择的更多信息。

您使用带 Flurry Analytics 功能的本服务即意味着您同意在此服务中使用 Flurry Analytics。

2. 转让

我们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：

- 1). 在获取明确同意的情况下转让：获得您的明确同意后，我们会向其他方转让您的个人信息；
- 2). 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、组织继续受此隐私政策的约束，否则我们将要求该公司、组织重新向您征求授权同意。

3. 公开披露

我们仅会在以下情况下，公开披露您的个人信息：

- 1). 获得您明确同意后；
- 2). 基于法律的披露：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。

IV. How We Protect Your Personal Information

(1) We have employed security measures complying with industry standards to protect personal information you provide, to prevent the data from unauthorized access, public disclosure, use, modifications, damage or loss. We will adopt reasonable and feasible measure to protect your personal information. For example, we use a trusted protection mechanism to protect data from attacks and we deploy an access control mechanism to ensure only authorized persons can access personal information.

(2) We may adopt reasonable and feasible measures to ensure irrelevant personal information is not collected. We only keep your personal information within the period required for fulfilling the purposes stated in this Policy, unless an extension is required or permitted by applicable law.

(3) The Internet is not an absolutely safe environment, and also, emails, instant messaging and the communications with other SAP users are not encrypted, so we strongly recommend not using such methods to send personal information.

四、我们如何保护您的个人信息

(1) 我们已使用符合业界标准的安全防护措施保护您提供的个人信息，防止数据遭到未经授权访问、公开披露、使用、修改、损坏或丢失。我们会采取一切合理可行的措施，保护您的个人信息。例如，我们会使用受信赖的保护机制防止数据遭到恶意攻击；我们会部署访问控制机制，确保只有授权人员才可访问个人信息。

(2) 我们会采取一切合理可行的措施，确保未收集无关的个人信息。我们只会在达成本政策所述目的所需的期限内保留您的个人信息，除非需要延长保留期或受到法律的允许。

(3) 互联网并非绝对安全的环境，而且电子邮件、即时通讯、及与其他 SAP 用户的交流方式并未加密，我们强烈建议您不要通过此类方式发送个人信息。

V. Your Rights

In accordance with China's laws, regulations and standards, and widely accepted practices in other countries and regions, you are guaranteed certain rights to your personal information.

Most of the personal information in the SuccessFactors's mobile application is controlled by SAP's Customer (e.g., your employer). With respect to the personal information that we collect under this Privacy Statement, you may contact SAP SuccessFactors at www.successfactors.com for any questions or concerns regarding your data. To the extent we have retained such information with an identifier that can be connected to you, you have the following rights.

(1) Accessing Your Personal Information

You have the right to access your personal information, except the exceptions specified in law and regulations. If you hope to exercise the right to access data, you may contact us at www.successfactors.com. We will respond to your access request within 30 days.

Other personal information generated during your use of our products or services will be offered to you if it does not require our high investment. If you hope to access the data, please contact us at www.successfactors.com.

(2) Correcting Your Personal Information

When you discover errors in your personal information we have processed, you have the right to require us to make correction. You may request a correction by contacting us at www.successfactors.com. We will respond to your correction request within 30 days.

(3) Deleting Your Personal Information

In the following cases, you may send a request to us to delete personal information:

1. If our behavior in processing personal information violates laws or regulations;
2. If we collect and use your personal information, without obtaining your consent;
3. If our behavior in processing personal information violates the agreement reached with you;
4. If you desist from the use of our products or services, or you cancel the account;
5. If we desist from providing products or services to you.

If we decide to respond to your deletion request, we will also inform the entities which obtains your personal information from us to delete the information without delay, unless otherwise specified in laws and regulations, or these entities have obtained your separate authorization.

When you delete information from our services, we may not immediately delete such information from the backup system, but will delete it when the backup is updated.

(4) Responding To Your Above Requests

To ensure security, you may need to submit a written request, or prove your identity in other ways. We may first require you to have your identity verified before processing your request. We will reply within 30 days. If you have any concerns, you may contact us at www.successfactors.com

For any of your reasonable requests, we will not charge fees in principle, but if same requests are frequent and exceed the reasonable extent, certain fees will be charged per the cost at our own discretion. Those requests that are repeated without good reasons, require too many technical measures (e.g. a new system is needed or current practice will be changed fundamentally), put others' legitimate rights and interests at risk or are very impractical (e.g. require a backup of information stored in the tape) may be rejected.

In any of the following cases, we cannot respond to your request in accordance with applicable law and regulations:

1. Directly related to national security and national defense security;
2. Directly related to public security, public health, and major public interests;
3. Directly related to criminal investigation, prosecution, trial, and enforcement of judgments;
4. There is sufficient evidence indicating that you have subjective malicious intentions or abuse your rights;
5. Responding to your request will cause serious damage to the legitimate rights and interests of you or other individual or organization.
6. Involving trade secrets.

五. 您的权利

按照中国相关的法律、法规、标准，以及其他国家、地区的通行做法，我们保障您对自己的个人信息行使特定权利：

SuccessFactors 移动应用程序中的大多数个人信息由 SAP 的客户（例如您的雇主）控制。关于我们根据本隐私声明收集的个人信息，您可以通过 www.successfactors.com 联系 SAP SuccessFactors，以了解有关您数据的任何问题或疑虑。在某种程度上，我们保留了可以与您联系的标识符的此类信息，您拥有以下权利。

(1) 访问您的个人信息

您有权访问您的个人信息，法律法规规定的例外情况除外。如果您想行使数据访问权，您可以通过 www.successfactors.com 联系我们。我们将在 30 天内回复您的访问请求。

(2) 更正您的个人信息

当您发现我们处理的关于您的个人信息有错误时，您有权要求我们做出更正。您可以通过 contact us at www.successfactors.com 联系我们来要求更正。我们将在 30 天内回复您的更正请求。

(3) 删除您的个人信息

在以下情形中，您可以向我们提出删除个人信息的请求：

- 1、如果我们处理个人信息的行为违反法律法规；
- 2、如果我们收集、使用您的个人信息，却未征得您的同意；
- 3、如果我们处理个人信息的行为违反了与您的约定；
- 4、如果您不再使用我们的产品或服务，或您注销了账号；
- 5、如果我们不再为您提供产品或服务。

若我们决定响应您的删除请求，我们还将同时通知从我们获得您的个人信息的实体，要求其及时删除，除非法律法规另有规定，或这些实体获得您的独立授权。

当您从我们的服务中删除信息后，我们可能不会立即备份系统中删除相应的信息，但会在备份更新时删除这些信息。

4) 响应您的上述请求

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。

我们将在三十天内做出答复。如您有疑虑，还可以通过 www.successfactors.com 联系我们。

对于您合理的请求，我们原则上不收取费用，但对多次重复、超出合理限度的请求，我们将视情收取一定成本费用。对于那些无端重复、需要过多技术手段（例如，需要开发新系统或从根本上改变现行惯例）、给他人合法权益带来风险或者非常不切实际（例如，涉及备份磁带上存放的信息）的请求，我们可能会予以拒绝。

在以下情形中，按照法律法规要求，我们将无法响应您的请求：

- 1、与国家安全、国防安全直接相关的；
- 2、与公共安全、公共卫生、重大公共利益直接相关的；
- 3、与犯罪侦查、起诉、审判和判决执行等直接相关的；
- 4、有充分证据表明您存在主观恶意或滥用权利的；
- 5、响应您的请求将导致您或其他个人、组织的合法权益受到严重损害的。
- 6、涉及商业秘密的。

VI. How We Process Personal Information of Children

Our products, website and services are for adults. Despite different definition of children in local law and customs, we consider anyone less than the full age of 14 a child. If we discover we have collected personal information of children without prior verifiable consent of their parents, we will find ways to delete such data as soon as possible.

六、我们如何处理儿童的个人信息

我们的产品、网站和服务主要面向成人。尽管当地法律和习俗对儿童的定义不同，但我们将不满 14 周岁的任何人均视为儿童。如果我们发现自己在未事先获得可证实的父母同意的情况下收集了儿童的个人信息，则会设法尽快删除相关数据。

VII. How is Your Personal Information Transferred Worldwide

As we provide products or services via worldwide resources and servers, your personal information, with your authorization/consent, may be transferred to the jurisdictions beyond the country/region where you use products or services, or may be accessed from these jurisdictions.

Such jurisdictions may have different data protection laws, or have no such law. In such case, we will ensure your personal information will have sufficiently equal protection as in the People's Republic of China. For example, we may seek your consent or take security measures such as de-identification of data before launching a cross-border transfer of your personal information,

七、您的个人信息如何在全球范围转移

由于我们通过遍布全球的资源和服务提供产品或服务，这意味着，在获得您的授权同意后，您的个人信息可能会被转移到您使用产品或服务所在国家/地区的境外管辖区，或者受到来自这些管辖区的访问。

此类管辖区可能设有不同的数据保护法，甚至未设立相关法律。在此类情况下，我们会确保您的个人信息得到在中华人民共和国境内足够同等的保护。例如，我们会请求您对跨境转移个人信息的同意，或者在跨境数据转移之前实施数据去标识化等安全举措。

VIII. How Is This Policy Updated

Our Privacy Policy may be updated. Without your explicit consent, we will not diminish the rights you are entitled to under this Privacy Policy. We will post any changes to this Policy on this page.

For major changes, we will also provide a more eye-catching notice (including we will email a notice for some services, detailing specific changes to the Privacy Policy).

Major changes as referred to in this Policy include but not limited to:

1. Major changes to our service model, e.g. the purpose of processing personal information, types of personal information processed, and use method of personal information, etc.
2. Major changes to our ownership structure and organizational structure, e.g. a change of shareholders due to adjustment of business, bankruptcy and merger & acquisition.
3. A change to main targets of sharing, transfer or public disclosure of personal information.
4. Major changes to your right to processing of personal information and the method of exercise.
5. A change to our department in charge of personal information security, its contact information and complaint channel.

6. A personal information security impact assessment report shows high risks.

We will also file the old versions of this Policy for your review.

八、本政策如何更新

我们的隐私政策可能变更。

未经您明确同意，我们不会削减您按照本隐私政策所应享有的权利。我们会在本页面上发布对本政策所做的任何变更。

对于重大变更，我们还会提供更为显著的通知（包括对于某些服务，我们会通过电子邮件发送通知，说明隐私政策的具体变更内容）。

本政策所指的重大变更包括但不限于：

- 1、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；
- 2、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；
- 3、个人信息共享、转让或公开披露的主要对象发生变化；
- 4、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；
- 5、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；
- 6、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。

IX. How Do You Contact Us

If you have any question, comment or suggestion on this Policy, please contact us by www.successfactors.com.

Generally, we will reply within 30 days.

九、如何联系我们

如果您对本隐私政策有任何疑问、意见或建议，通过以下方式与我们联系：

www.successfactors.com.

一般情况下，我们将在三十天内回复。