



PRIVACY NOTICE 隐私声明

The hereby privacy notice is established pursuant in the compliance of the provisions under the Personal Data Protection Law of Nicaragua (the “Personal Data Act”) and its Regulation, please consider the terms and conditions given herein, since any contribution of personal data by any means constitutes the acceptance of such terms and conditions and consequently, Draexlmaier Partes Automotrices Nicaragua, S.A., (DRAEXLMAIER) are expressly authorized for the handling of such data.

All undefined terms used with initial capital letter in the hereby notice shall mean the Personal Data Act.本隐私声明系根据尼加拉瓜个人信息保护法（“个人信息法”）及相关条例的规定而制定。本声明中所包含的条款和条件适用于以任何方式提供个人信息的情形，Draexlmaier Partes Automotrices Nicaragua, SA（DRAEXLMAIER）因此而获得处理该个人信息的明确授权。

本声明中首字母大写的未定义术语均指“个人信息法”。

Identity and Address of the Responsible 责任主体的名称和地址.

The responsible for the handling of the Personal Data is Draexlmaier Partes Automotrices Nicaragua, S.A.

负责处理个人信息的主体为：Draexlmaier Partes Automotrices Nicaragua, S.A.

Purposes of handling Personal Data. 处理个人信息的目的

Data and/or information that has been provided or shall be willingly provided, is confidential. The purposes by which DRAEXLMAIER collects personal data are:

已经提供或即将自愿提供的数据和/或信息属于保密信息。DRAEXLMAIER收集个人信息的目的为：

A. Regarding its Employees, to keep an appropriate internal control, of EHS, and security measures, as well as for performing the corresponding payments derived from a work contractual relationship. For safety purposes, DRAEXLMAIER may install surveillance video systems, so therefore, the captured images by such system shall be used to take the required measures in order to guarantee the safety of the persons entering the Company’s facilities, as well as evidence of infringements and /or non compliance of the applicable standards and /or existing laws.

A. 雇员的内部管理，如EHS管理和安全措施，以及支付工作合同关系中所产生的相应付款。基于安全考虑，DRAEXLMAIER可能会安装监控录像系统，其所采集的图像将被用于为确保进入公司人员的安全所需采取的的必要措施，以及为违反和/或不遵守现行标准和/或法律的现象提供证据。

In Addition to the above mentioned, DRAEXLMAIER shall be entitled to share its employees personal data with institutions such as banks, finance or microfinance institutions, in order to facilitate the granting of loans and/or credits for its employees.

除上述内容外，DRAEXLMAIER有权与银行、金融机构或小额信贷机构等机构分享其雇员的个人信息，以便为其雇员提供贷款和/或信贷。

On the other hand ,the collected personal information shall be used in order to enable DRAEXLMAIER to keep the control of the skills management (e.g., formation, employee development, performance and succession plans), and to allow subsidiary companies of the Group in other countries to get information about DRAEXLMAIER worldwide employee population, in order to facilitate statistical data used by the Company’s Management linked to decision- making purposes, furthermore, personal information shall be used with the purpose to elaborate and distribute newsletters and/or gazettes and /or internal DRAEXLMAIER magazines for the purposes of statistics disclosure and /or related with the labor environment within the Organization.

此外，所搜集的个人信息也可以被用于DRAEXLMAIER的技术管理控制（例如组建，雇员发展，绩效和继任计划），并允许集团位于其他国家的子公司获取有关DRAEXLMAIER全球雇员人数的信息，以便公司管理层在做决策时使用相关统计数据。为统计数据的发布和/或与组织内部劳动环境的发布，个人信息也可以被用于快讯和/或公报和/或DRAEXLMAIER内部资讯的草拟和发布。

Regarding potential employees, shall be for purposes of internal control of work interviews schedule, evaluations of performance, contact, and tracking and recruitment.

就潜在雇员而言，个人信息将被用于面试时间安排、面试评估，联系方式、追踪和雇佣等目的。

B. Regarding its suppliers and clients, for purposes of Identification, location, contact, deliveries, payments, collection , statistics, information about services and/or products , quality evaluation, as well as its transmission to third parties by any mean established by law.

就供应商和客户而言，个人信息将被用于识别，定位，联系，交付，付款，收集，统计，有关服务和/或产品的信息，质量评估以及以法律规定的任何方式向第三方传递。

Generally, Personal data that DRAEXLMAIER collects from the holders are names, addresses, phone numbers, e-mail addresses and in some cases, general physical health state, curricular reviews bank and tax data.

一般而言，DRAEXLMAIER从持有人那里收集的个人信息包括姓名、地址、电话号码，电子邮件地址，以及特定情形中关于健康状况、成绩单、银行和税务等方面的信息。

When collecting Personal data in case that there exist a different handling from the one indicated in this section, DRAEXLMAIER shall notify this to the holder, with the purpose, for the holder to express its consent for the objective implied if required.

如果所收集的个人信息将被用于本声明之外的目的，DRAEXLMAIER应就此通知持有人，征得持有人对该使用目的同意。

Safety measures regarding Personal Data. 个人信息安全保护措施

The responsibility of the Holder of the personal data is to guarantee that the Data provided to DRAEXLMAIER is true and complete, and shall be liable also to notify DRAEXLMAIER about any modifications for the purpose to comply with the data update obligations.

个人信息持有人应确保其向DRAEXLMAIER所提供信息的真实性和完整性，为履行信息更新义务，亦应将个人信息的变更通知DRAEXLMAIER。

Draexlmaier will store the personal data so that the holders can access it, also, the data will be canceled if they cease to be useful for the purpose it was originally collected for.

DRAEXLMAIER将以持有人可以访问的方式存储个人信息。个人信息不再被用于最初收集目的时，应当被删除。

The handling temporality of the Holder’s personal data shall depend on the legal agreement held with DRAEXLMAIER, and on the duties required by the current legislation and the competent authorities. At all cases the information shall be stored for a reasonable time.

持有人个人信息处理的时效性由其与DRAEXLMAIER所订立的合法协议来规定，并遵守现行法律和有权机构所颁布的规定。在任何情况下，个人信息都应存储一段合理的时间。

DRAEXLMAIER has established and is committed to keep the administrative technical and physical safety measures, that enables the protection of personal data collected from any damage, loss, alteration, access or unauthorized treatment. DRAEXLMAIER已经建立并致力于维持管理技术和人身安全保护措施，以避免所搜集的个人信息遭到破坏、遗失、修改、被他人获取或非授权的处理。

DRAEXLMAIER will not be liable for any incorrect or false personal data. DRAEXLMAIER就个人信息的准确性或虚假性不承担任何责任。

Means to exercise Rights 权利行使的方式

The data Holder will, at any time, exercise the access, rectification, modification, elimination, complementation, addition, and update and or cancellation of the personal data (the Rights) established at the Personal Data Law as well as the protective actions of the personal data that may be entitled to. In order to exercise the rights, according to the provisions of the Personal data Act, The holder may submit a written request addressed to the DRÄXLMAIER Group to the following e-mail address info@draexlmaier.de or directly to the DRAEXLMAIER address mentioned above.

个人信息持有人将可以随时行使“个人信息法”以及其他个人信息保护措施赋予其的权利，对个人信息（权利）进行访问，修正，修改，删除，补充，添加，更新和删除。为了行使该权利，持有人可以根据“个人信息法”的规定，向DRÄXLMAIER集团提交书面申请（[邮件地址：info@draexlmaier.de](mailto:info@draexlmaier.de)）或直接发送至上述DRAEXLMAIER地址。

The exercise of the Rights request shall contain and accompany the following

权利行使申请包括如下内容：

1. - Holders Name and Address or any other mean by which DRAEXLMAIER shall send the respective Request answer; 持有人名称和地址或DRAEXLMAIER将发送相应申请答复的任何其他方式；
2. - The documentation that certifies the Holder's Identity or, if required, the legal representation on the requestor's behalf; 证明持有人身份的文件，或者必要时，代表请求人的法律代表；
3. - The clear and concise description of the personal data from which the holder wishes to exercise any of the access, rectification, cancellation and opposition Rights; 对持有者希望行使任何访问，更正，删除和异议权的个人信息相关内容的清晰简洁描述；
4. - In the case of Personal data rectification requests, The holder shall indicate, besides of the early mentioned in this section, the modifications that shall take place and provide the documentation that supports his/her request, and; 提交个人信息修正申请时，除需提交本条上述文件之外，持有人需描述所要修正的内容并提交相关支持性文件；
5. - Any other element or document which facilitates the location of the corresponding Personal Data. 任何其他便于查找相应个人信息的说明或文件。

DRAEXLMAIER shall notify the Holder about the determination adopted, in a term no longer than twenty days, from the date of the receipt of the respective request, with the purposes to make it effective, within the following fifteen days to the communication of the answer date.

The terms mentioned above may be extended just once for an equal period of time as long as the circumstances of the case in question so warrant.

DRAEXLMAIER应自收到相应申请之日起20日内通知持有人所做出的决定，在之后十五天内至通知答复日期间有效。

必要时，上述条款所规定的期限应当延长一次，延长时间同上。

Personal Data transfer. 个人信息的转让

In case that the holder expresses no opposition against the transfer of his/her Personal data, shall be understood as consent granted for this purpose.

If required, DRAEXLMAIER shall notify the hereby Privacy Notice to the third parties to whom the personal data is transferred and the terms by which the holder subject its handling.

持有人对个人信息的转让未提出异议的，应视为其同意。

必要时，德科斯米尔会向接收个人信息的第三方告知本隐私声明以及持有人对信息使用的要求。

Changes or Modification on the Privacy Notice. 隐私声明的变更或修订

With the hereby Privacy Notice, the information Holders are duly informed about the data collected from them and its purposes, accepting the terms therein contained which were prepared in accordance to the Personal Data protection Act in possession of the individuals.

DRAEXLMAIER reserves the right to perform changes in the hereby Privacy Notice.

Any modification of this Privacy Notice will be published in the following web page: www.draexlmaier.com

根据此隐私声明，信息持有者知道所被收集的信息及其使用目的，并接受其中所包含的依据“个人信息法”所草拟的条款。

DRAEXLMAIER保留更改本隐私声明的权利。

本隐私声明的任何修改将发布在如下网站：www.draexlmaier.com