

China Addendum to Global Privacy Notice

This Addendum supplements the Global Privacy Notice attached to www.luvata.com (the “Site”), a website provided by Luvata, for the purpose of ensuring compliance with all applicable privacy laws of jurisdictions in China.

Your consent

We process your personal data as defined under applicable Chinese laws, regulations and guidance subject to your consent. In addition to the circumstances of processing set out in this privacy policy, we will first obtain your express consent prior to processing your personal data in the following circumstances:

Processing of sensitive personal data: Certain types of personal data we collect from you are classified as sensitive personal data under applicable Chinese laws, regulations and guidance, including your address, email address, phone number, authentication information (such as your account username, password and other information for authentication and account access), payment data, transaction information, and certain profile data such as webpage browsing records.

Transfer of your personal data outside of China: Please see "location of processing/ international transfers" section below.

Changes in this privacy policy: If we make changes to this privacy policy that affects your rights under this privacy policy, or if we change the scope of our processing of your personal data, we will first obtain your prior express consent.

Location of processing/ International transfers

Our website is a global website and is hosted outside of China. To the extent we transfer your personal data from China to another country (which may have data protection laws that are different to the laws in China), we will ensure that your personal data will be protected in a similar manner as it is in China. In particular, we will only transfer your personal data outside of China with your prior express consent or upon conducting security measures such as de-identifying your personal data prior to the transfer.

Security

We will let you know in accordance with law if a breach occurs that may have compromised the privacy or security of your personal data. If it is determined that a breach of personal data has occurred, we will in accordance with law notify you of the information involved, steps you may take, and a summary of actions being taken to investigate the breach, reduce harm to you, and protect against future breaches. We will also comply with any obligations to notify as required in accordance with applicable law.

Your rights

If you are a data subject in China, you have the right to access, correct, or erase any personal data we have collected about you. You may withdraw your consent at any time for any data processing we do based on consent you have provided to us:

Right to access your personal data	You have the right to request us to provide to you: (a) a description of the type of personal data we hold about you, including a general account of its use, its source; and (b) what personal data has been made available to other organizations, e.g. affiliated companies. You may also request a copy of your basic personal data, personal identity information and any personal health, physiological, education and employment (e.g. resume) information that we have about you.
Right to correct your personal data	You have the right to request us to correct any personal data we hold about you if you think they are incorrect or incomplete
Right to request erasure of your personal data	You have the right to request us to erase your personal data if: <ul style="list-style-type: none"> a. your personal data has been given to or collected by us in violation of any applicable law; b. our use and collection of your personal data is contrary to what we have agreed with you; c. we collect and use your personal data without obtaining any consent from you; d. you no longer wish to receive information from us or any service we provide to you; or e. we no longer provide any service to you.
Right to delete or cancel your account	You have the right to delete or cancel any account that you set up with us. Please follow the directions for cancelling your account according to our Group Privacy Policy.
Right to revoke any consent on our use of your personal data	Even if you have given us consent to collect, use, share or disclose some or all of your personal data, or send to you any marketing information based on your personal data, you can opt-out any time by requesting us to have your name taken off of our registration list, cease receiving correspondence or newsletters from us, limit our sharing of personal data with third parties who may offer information or services to you. However, if you do so, you may not be able to access or use our services which depend on having such personal data.

You may exercise your rights by submitting a written request to us at the address set forth in the “Contact Us” section. We will review your request and we generally will provide a response or a copy of the information you have requested within 30 days. We do not charge you for providing the information. However, in certain circumstances, for example, if you make more than one requests which are identical or similar within a period of 12 months, we may charge a reasonable, cost-based fee. In certain situations, we may not be able to provide access to all of your personal data we hold or we may have to decline your request. The reasons for doing so will be provided to you upon request. Exceptions may include information that contains references to other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons.

Data controller in China:

Luvata / MM Metal Products (Suzhou) Co. Ltd.
ATTN: Dean Liu
53 Sanzhuang Street, Weiting Town, Suzhou Industrial Park
Jiangsu Province, 215121 China

If you would like to submit a complaint about our response to your China specific requests regarding your personal data, please write to us at:

Email: privacy@luvata.com
Address: Luvata Oy
Kuparitie 5
FI-28330 Pori, Finland

Usually, we will provide a response to your inquiries or request within 30 days.

If you disagree with our decision, you may submit your complaint to [the China International Economic and Trade Arbitration Commission for arbitration. The seat of arbitration will be [Shanghai]. The arbitral award will be final and binding upon you and us. The arbitration will be conducted in accordance with the CIETAC Arbitration Rules in effect at the date of the Request for Arbitration, subject to the following:

(1) The arbitration shall be conducted in English and Chinese. All documents filed and all oral submission must be in English and Chinese. Any party wishing to rely on documentary or witness evidence which is not in both languages shall be responsible for providing an accurate translation or interpretation of the same to the other party and to the arbitrators, at the same time as the original language version is provided. In the absence of such translation or interpretation, such evidence shall be disregarded.

(2) There shall be one arbitrator.

(3) You agree to the appointment of arbitrators from outside of CIETAC's Panel of Arbitrators.