

## 招聘个人信息保护政策

# Recruitment Personal Information Protection Policy

C2 For internal use only

### Contact

Human Resources  
Head of Human Resources,  
Greater China  
Tel.: +86 10 85919807

### Scope of application

MR (Reinsurance) branches and offices in Mainland China

### Valid from

14 November 2022

### Version

1.1

### Authorized by

Head of Human Resources, Greater China

### Authorized on

14.11.2022

### Retention period

10 Years

### Classification

Policy

### Level of obligation

Binding

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## 1 概述

### Overview

慕尼黑再保险公司北京分公司、慕尼黑再保险公司上海代表处、思韬咨询（北京）有限公司（每一公司实体简称为“公司”）重视您的信任，并致力于负责任地管理、使用和保护您的个人信息。本招聘个人信息保护政策（“本政策”）规定了公司会如何处理您的个人信息，这些信息包括您通过线上和线下渠道向公司提供的、与您的求职或实习申请相关的个人信息，以及公司从第三方合法获取（例如通过背景调查）的您的相关个人信息。在您作出求职或实习申请前，请您务必仔细阅读和理解本政策，一旦您出于求职或实习申请目的向公司提供您的个人信息，即视为您同意本政策的全部内容。

**Munich Re Beijing Branch, Munich Re Shanghai Representative Office, and Smart Thinking (SiTao) Consulting (Beijing) Company Ltd.** (each entity is hereinafter separately referred to as “**Company**”) value your trust and are committed to the responsible management, use and protection of your personal information. This Recruitment Personal Information Protection Policy (“**Policy**”) specifies how the Company will process your personal information, including the personal information provided to the Company online and on-site in connection with a job or internship application, as well as personal information that the Company lawfully obtains from third parties (for example, through background checks). Please carefully read and fully understand this Policy before you apply for a job or internship. By providing personal information to the Company for the purpose of a job or internship application, you will be deemed to have agreed to the entire content of this Policy.

公司承诺遵守《中华人民共和国个人信息保护法》等适用的法律法规，并遵循合法、正当、必要和诚信的原则，负责任地处理个人信息。

The Company undertakes to abide by the “Personal Information Protection Law of the People’s Republic of China” and other applicable laws and regulations, and processes personal information in a responsible manner that is in accordance with the principles of lawfulness, legitimacy, necessity and good faith.

本政策规定了公司收集和处理的您个人信息的范围、处理目的、处理方式以及您拥有的相关权利等信息。

This Policy specifies the scope of your personal information that is collected and processed by the Company, the purposes and methods of such processing, and your relevant rights.

您承诺您提交的任何信息均真实、完整，且没有误导性。提交不准确、不完整或有误导性的信息可能会导致您的申请被拒绝；如果您基于任何不准确、不完整或有误导性的信息被公司聘用，则可能面临纪律处分，包括立即终止雇佣关系等。

You promise that any information that you have submitted or will submit is accurate, complete, and not misleading. Inaccurate, incomplete, or misleading information submitted may result in the rejection of your application. If you are hired by the Company based on any inaccurate, incomplete, or misleading information, you may face disciplinary actions, including the immediate termination of your employment relationship.

本政策使用了以下术语：

This Policy uses the following terms:

- “**个人信息**”，是指以电子或其他方式记录的与已识别或可识别的自然人有关的各种信息，不包括匿名化处理后的信息；  
“**Personal information**” refers to any kind of information related to an identified or identifiable natural person as electronically or otherwise recorded, excluding information that has been anonymized.
- “**处理**”，包括个人信息的收集、存储、使用、加工、传输、提供、公开和删除等；  
“**Processing**” includes the collection, storage, use, editing, transmission, provision, disclosure, and deletion of personal information.
- “**个人信息处理者**”，是指在个人信息处理活动中自主决定处理目的、处理方式的任何组织、个人。  
“**Personal information processor**” refers to any organization or individual that independently determines the purpose and method of processing in their activities of processing of personal information.
- “**敏感个人信息**”，是指一旦泄露或非法使用，容易导致自然人的人格尊严受到侵害或人身、财产安全受到危害的个人信息，包括生物识别、医疗健康、金融账户等信息，以及不满十四周岁未成年人的个人信息。  
“**Sensitive personal information**” refers to personal information that, once leaked or illegally used, will easily lead to infringement of human dignity or damage to physical or property safety of a natural person, including biometric recognition, medical and health, financial account, and other information of a natural person, including any personal information of minors under the age of fourteen (14).

## 2 公司使用您个人信息的目的

### The Purpose for which the Company Uses Your Information

公司收集和使用您的个人信息是为了履行法定义务、签订潜在雇佣合同和人力资源管理，公司会严格按照适用法律法规的要求处理您的个人信息。

The Company's purposes for collecting and using your personal information are to perform statutory obligations, conclude a potential employment contract and carry out human resource management. The Company will process your personal information strictly in accordance with the requirements of applicable laws and regulations.

在适用法律法规允许的情况下，公司将出于以下目的处理您的个人信息：

Where permitted by applicable laws and regulations, the Company will process your personal information for the following purposes:

- 处理您的申请、评估您的工作能力和资质，以管理公司与您的潜在雇佣关系和签署潜在的雇佣合同；  
To process your application and evaluate your abilities and qualifications for the job in order to manage your potential employment with the Company and to conclude a potential employment contract;
- 回复您的询问并就您的申请与您沟通、向您发送有关申请状态的信息及公司条款和政策的变更通知等；  
To respond to your inquiries and communicate with you about your application, as well as to send you information about your application status and any notice of change to the Company's terms and policies;

- 开展背景调查 ;  
To conduct background checks;
- 履行法律法规所规定的义务或政府部门的要求 ; 以及  
To perform obligations under laws and regulations or comply with requirements of government authorities; and
- 其他与公司招聘、人员管理和规划相关的活动。  
To conduct other activities related to the Company's recruitment, human resource management and planning.

### 3 公司收集和处理的个人信息

#### Personal Information Collected and Processed by the Company

在适用法律法规允许的情况下，为了评估您的申请，公司会从您及第三方（例如招聘人员、您的证明人、前雇主、您就读的教育机构）收集与您的申请相关的信息。公司收集的信息包括：

To the extent permitted by applicable laws and regulations, and in order to evaluate your application, the Company will collect information related to your application from you and third parties (such as recruiters, your referee(s), previous employers, and educational institutions you attended). Such information includes:

- 个人基本资料：个人姓名、出生地、生日、性别、国籍、住址、个人电话号码、电子邮件地址；  
Basic personal information: your name, place of birth, date of birth, gender, nationality, address, personal phone number, and email address;
- 个人教育工作信息：意向岗位及工作地点、教育经历、工作经历、专业协会会员信息、培训记录、成绩单；  
Personal education and work information: intended job position and work location, education background, work experience, professional association membership information, training records and academic transcripts;
- 个人财产信息：征信信息。  
Personal property information: credit information.

公司仅在适用法律法规允许的情况，为实现本政策所述目的和在必要的情况下收集您的个人信息，其中包括您的敏感个人信息。公司可能收集的您的敏感个人信息已在上方列表中用下划线标注。公司实际收集的信息在不同情况下可能与上表所述信息内容略有不同。例如，公司仅在确认您接受公司提供的任命书后才会收集您的出生地、生日、住址、培训记录、成绩单和征信信息，用于背景调查等目的。

The Company will only collect your personal information, including your sensitive personal information, as permitted by applicable laws and regulations, for the purposes described in this Policy and as is necessary. The sensitive personal information that the Company might collect has been underlined in the list above. The personal information actually collected by the Company may slightly differ from the information described in the list above under various different circumstances. For example, only upon your acceptance of the Company's Letter of Appointment will the Company collect information about your place of birth, date of birth, address, training records, academic transcripts and credit information for the purpose of background checks.

如果您在申请过程中向公司提供推荐人或任何其他个人的个人信息，例如工作证明人的姓名、联系方式等，则您有责任在向公司提供信息之前，确保已向其说明公司处理其个人信息的目的及所涉及个人信息的类型，并且已按照法律法规要求获得他人的同意。您有责任确保您提交的信息不侵犯任何第三方的权利。

Should you provide the Company with the personal information of a referee or any other individuals during the application process, such as the name and contact details of a work referee, it is your responsibility to ensure that such individuals have been informed of the purposes of the Company's personal information processing and the types of personal information involved before providing such information to the Company, and obtain their consent in accordance with laws and regulations. It is your responsibility to ensure that the information you submitted does not infringe on the rights of any third party.

## 4 公司对您个人信息的共享

### Sharing of Your Personal Information by the Company

出于招聘以及人力资源管理为目的，公司会委托向公司提供相关服务的第三方处理您的个人信息，例如，公司可能委托第三方机构查询、核实您提供给公司的有关信息，该等受托第三方为提供服务有必要知晓相关信息。公司仅为实现本政策所述目的委托第三方处理您的个人信息，对于受公司委托、代表公司处理个人信息的第三方，公司会根据适用法律法规与其签署个人信息处理协议并采取适当措施监督其个人信息处理活动。

For the purposes of recruitment and human resource management, etc, the Company will entrust third parties that provide relevant services to the Company to process your personal information. For example, the Company may entrust a third-party institution to check and verify the relevant information you provide to the Company. The personal information that the Company provides is needed by the entrusted third parties in order to provide services. Only for the purposes described in this Policy will the Company entrust the third parties to process your personal information. For the third parties entrusted by the Company to process personal information on behalf of the Company, the Company will sign personal information processing agreements with them and take appropriate measures to monitor their personal information processing activities in accordance with applicable laws and regulations.

公司会部署访问控制机制，仅出于本政策所述目的，向具有了解您个人信息的业务需求的人员授予访问权限。上述人员包括人力资源部门和信息技术部门的相关人员，以及您申请职位所在部门的相关人员。

The Company deploys access control mechanisms to grant access only to those personnel with a business need to know your personal information and only for the purposes described in this Policy. Such personnel include relevant persons in the Human Resource Department and IT Department, as well as those relevant persons in the department for which you are applying.

慕尼黑再保险集团作为一家全球集团，在多个国家拥有办公场所。公司隶属于慕尼黑再保险集团，为对集团关联公司及人员实行全球统一的招聘和人力资源管理，慕尼黑再保险集团需要使用全球统一的人力资源管理系统。因此，您的个人信息将会传输至中华人民共和国境外其他国家，当公司将您的个人信息传输到其他国家时，公司将采取适当措施（包括合同协议），以确保公司的传输行为及慕尼黑再保险公司德国公司（“境外接收方”）对您个

人信息的处理活动符合适用法律法规的要求。此外，境外接收方也遵循与公司相同或等效的政策和标准。如以下“6.您的权利”所述，您可以向公司提出相关请求，了解公司如何保护传输至境外接收方的您的个人信息。如果您希望向境外接收方行使您的个人信息相关权利，您可通过“10.联系方式”所述方式与境外接收方联系。

Munich Re Group is a global group with offices in several countries. The Company is affiliated to the Munich Re Group. To implement the global unified recruitment and human resource management for all the Munich Re Group's affiliated companies and their staff, it is necessary for the Munich Re Group to use same global human resource management systems. Hence, your personal information will be transferred to other countries outside the People's Republic of China. When the Company transfers your personal information to other countries, the Company will take appropriate measures (including contractual agreements) to ensure that the Company's transfer and Munich Reinsurance Company Germany's ( “Overseas Recipient”) processing of your personal information comply with the requirements of applicable laws and regulations. In addition, the Overseas Recipient follows the same or equivalent policies and standards as the Company. As described in “6. Your Rights” below, you can submit requests to the Company to learn how the Company protects your personal information that has been transferred to the Overseas Recipient. If you wish to exercise your rights with the Overseas Recipient, you can contact the Overseas Recipient through the means described in “10. Contact Information”.

公司需要使用各种由第三方 IT 服务商提供的 IT 系统（特别是服务器位于中华人民共和国境外的系统）来处理您的个人信息，以实现慕尼黑再保险集团全球统一的人力资源管理。在此过程中，您的个人信息可能通过此类 IT 系统被传输至中华人民共和国境外。

The Company needs to use various IT systems provided by third-party IT service providers (especially those with servers located outside the People's Republic of China) to process your personal information for the global unified human resource management of Munich Re Group. During this process, your personal information may be transferred outside the People's Republic of China through such IT systems.

请您理解，在下列情形中，根据法律法规及国家标准，公司向其他方提供、或公开披露您的个人信息无需征得您的授权同意：

Please understand that in the following circumstances, according to laws, regulations and national standards, the Company does not need to obtain your consent when providing your personal information to other parties or disclosing your personal information to the public:

- 为订立、履行您作为一方当事人的合同所必需；  
Where it is necessary for the conclusion or performance of a contract to which you are a contracting party;
- 根据公司依法制定的劳动规章制度实施人力资源管理所必需；  
Where it is necessary for carrying out human resource management under legally established employment policies of the Company;
- 为履行法定职责或法定义务所必需；  
Where it is necessary for performing a statutory duty or statutory obligation;
- 为应对突发公共卫生事件，或紧急情况下为保护自然人的生命健康和财产安全所必需；  
Where it is necessary for responding to a public health emergency, or for protecting the life, health or property safety of a natural person in the case of an emergency;

- 依照适用法律法规在合理的范围内处理您自行公开或其他已经合法公开的个人信息；  
Where the personal information, which has already been disclosed by you or otherwise legally disclosed, is processed within a reasonable scope and in accordance with the applicable laws and regulations;
- 法律法规规定的其他情形。  
Any other circumstances as stipulated by laws and regulations.

## 5 个人信息的留存

### Retention of Personal Information

除非适用的法律法规要求或允许更长的保留期限，否则公司将在实现本政策所述目的所需的期限内保留您的个人信息。用于确定保留期限的相关因素包括：(i) 申请流程的持续时间；(ii) 公司与您的关系持续期间；(iii) 公司所承担的法律义务的要求；(iv) 任何未来空缺职位的适合性；以及 (v) 符合公司的法律立场（例如关于诉讼时效、诉讼或监管调查的适用法规）。通常，您的个人信息将保留至招聘流程结束后 3 年。

Unless a longer retention period is required or permitted by applicable laws and regulations, the Company will retain your personal information for as long as necessary to fulfil the purposes described in this Policy. Relevant factors used to determine the retention period include: (i) the duration of the application process; (ii) the duration of the Company's relationship with you; (iii) the requirements of the Company's legal obligations; (iv) the applicability for any future job vacancies; and (v) compliance with the Company's legal stance (such as applicable regulations regarding statute of limitations, litigation or regulatory investigations). Normally your personal information will be retained for up to 3 years after the end of recruitment process.

## 6 您的权利

### Your Rights

在适用法律法规允许的情况下，您可以要求查阅、复制、更正、补充、删除您的个人信息或撤回您的同意；或要求公司在适用法律法规允许的范围内停止使用您的个人信息。请按照“**10. 联系方式**”中所述方式与公司取得联系以提出请求。如您希望向“**4. 公司对您个人信息的共享**”中所述的境外接收方行使您的权利，或希望了解公司如何保护传输至境外接收方的您的个人信息，也请您通过“**10. 联系方式**”中所述方式联系公司，公司将根据适用法律法规回应您的请求。请您注意，您撤回同意并不影响撤回前基于您的同意已进行的个人信息处理活动的效力。

Where permitted by applicable laws and regulations, you may submit a request to access, copy, correct, supplement, or delete your personal information, or withdraw your consent; or request the Company to stop using your personal information to the extent permitted by applicable laws and regulations. You should contact and submit your requests to the Company through the means described in “**10. Contact Information**”. If you wish to exercise your rights with the Overseas Recipient described in “**4. Sharing of Your Personal Information by the Company**”, or if you wish to learn how the Company protects your personal information that has been transferred to the Overseas Recipient, please also contact the Company through the means described in “**10. Contact Information**”, and the Company will respond to your requests in accordance with



applicable laws and regulations. Please note that your withdrawal of consent does not affect the validity of the personal information processing activities carried out based on your consent prior to the withdrawal.

为了保护您的权益，公司仅针对您向公司专门接收相关请求的电子邮件地址发送的相关请求邮件进行回应，并可能需要在处理请求前验证您的身份。请注意，根据适用的法律法规要求，您可能无法就某些个人信息处理活动提出相应请求。不合法或不合理的权利请求将被拒绝，但公司会向您说明相关理由。

To protect your rights, the Company will only respond to relevant request emails that you send to the email address specifically designated by the Company to receive such requests. Moreover, the Company may need to verify your identity before processing such requests. Please note that you may not be able to submit requests regarding certain personal information processing activities under applicable laws and regulations. Unlawful or unreasonable requests will be declined, while the Company will provide you with an explanation.

如果您已就某特定职位提交个人信息，且需更改个人信息，请在更新个人信息后重新提交该职位的申请。

If you have already submitted your personal information for a particular position and need to make alterations, please resubmit your application for that position after the updates.

## 7 安全 Security

公司寻求使用合理的组织、技术和行政措施来保护组织内的个人信息。然而，任何数据传输或存储系统都无法保证绝对的安全。如果您有理由相信您的个人信息不再安全，请立即按照“**10.联系方式**”中所述方式通知公司。

The Company seeks to protect personal information within the organization using reasonable organizational, technical, and administrative measures. However, no absolute level of security exists for any data transmission or storage systems. If you have reasons to believe that your personal information is no longer safe, please notify the Company immediately through the means described in “**10. Contact Information**”.

## 8 指向第三方网站的链接 Links to Third Party Websites

本政策不适用任何第三方（包括公司官方网站上的链接指向的任何网站或服务的任何第三方运营者）与隐私、个人信息相关的活动或其他活动，公司对任何第三方的行为概不负责。在公司官方网站上添加链接，并不意味着公司认可该链接指向的网站或服务。

This Policy does not apply to the privacy-related, personal information-related activities or any other activities of any third parties (including any third-party operator of any website or services to which the Company's official website provides links). The Company is not responsible for the actions of any third parties. The provision of such links on the Company's official website does not imply that the Company approves the website or service to which the links point.

## 9 本政策的更新

### Updates to this Policy

公司保留随时修改本政策的权利，以应对公司未来的业务发展安排，以及行业或法律趋势的变化等。本政策发布后，所有变更即时生效。

The Company reserves the right to modify this Policy at any time in order to accommodate the Company's business development needs and changes in the industry or legal policies. All modifications will be effective immediately upon publication.

## 10 联系方式

### Contact Information

如果您有任何问题或要求，请随时通过 [HR\\_GC@munichre.com.cn](mailto:HR_GC@munichre.com.cn) 或以下方式联系公司：

If you have any questions or requests, please feel free to contact the Company at [HR\\_GC@munichre.com.cn](mailto:HR_GC@munichre.com.cn) or at:

- **慕尼黑再保险公司北京分公司**

地址：北京市朝阳区建国门外大街2号院3号楼20层、48层4801A、4801、4803、4804单元

**Munich Re Beijing Branch**

Address: 20F and Unit 4801A, 4801, 4803, 4804 of 48F, Building 3, No. 2, Jian Guo Men Wai Avenue, Beijing

- **慕尼黑再保险公司上海代表处**

地址：上海市浦东新区陆家嘴环路1000号恒生银行大厦14层

**Munich Re Shanghai Representative Office**

Address: 14/F, Hang Seng Bank Tower, 1000 Lujiazui Ring Road, Pudong New District, Shanghai

- **思韬咨询(北京)有限公司**

地址：北京市朝阳区建国门外大街2号院3号楼48层4802单元

**Smart Thinking (SiTao) Consulting (Beijing) Company Ltd.**

Address: Unit 4802, 48F, Building 3, No. 2, Jian Guo Men Wai Avenue, Beijing

如果您对本政策或公司的个人信息处理实践有任何问题，或希望行使您的相关权利，您可以通过以下联系方式与相关负责人联系：

If you have any questions about this Policy or the Company's personal information processing practices or wish to exercise your personal information rights, you can contact the relevant person in charge via:

- 数据保护官: [p0060014478@munichre.com.cn](mailto:p0060014478@munichre.com.cn)

- Contact our Data Protection Officer: [p0060014478@munichre.com.cn](mailto:p0060014478@munichre.com.cn)

## 11 版本历史

### Document history

Document history			
Version	Date	Author	Amendments/comments
1.0	14.11.2022	Human Resources	Release
1.1	16.03.2023	DPO	Update local HR and Data Protection emails
Version-number	<a href="#">Click here to enter a date.</a>	<a href="#">Click here to enter your name.</a>	<a href="#">Click here to enter text.</a>