

慕尼黑再保险公司北京分公司个人信息保护政策 - 合作伙伴、供应商及其他利益相关方商务联系人场景 Munich Re Beijing Branch Personal Information Protection Policy - Business Contacts of Business Partners, Service Providers and Other Interested Parties

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引言

Background

慕尼黑再保险公司北京分公司（以下简称“我们”或“慕再北分”）极为重视您的隐私保护，并深知个人信息对您的重要性。我们将按照法律法规要求和我们的信息安全标准采取相应的措施以保障您的个人信息权益。基于此，我们制订了《慕尼黑再保险公司北京分公司个人信息保护政策 - 合作伙伴、供应商及其他利益相关方商务联系人场景》（以下简称“本政策”或“个人信息保护政策”），以帮助您更好地了解慕再北分会如何处理您的个人信息，以及您根据法律法规享有何种权利。

Munich Reinsurance Company Beijing Branch (hereinafter referred to as "we" or "us" or "MRBJ") takes the protection of your privacy very seriously and recognizes the importance of protecting your personal information. We will take appropriate measures to protect your personal information in accordance with legal and regulatory requirements and our internal information security standards. We have this "Munich Re Beijing Branch Personal Information Protection Policy- Business Contacts of Business Partners, Service Providers and Other Interested Parties" (hereinafter referred to as the "Policy") to help you better understand how we process your personal information and your rights under the laws and regulations.

请您注意，本政策仅适用于我们在各业务环节的商务沟通场景。在该场景下，您是以商务上的身份在您所代表或所属的机构（即我们的合作伙伴、供应商或者其他商业利益方）和我们建立及维系商业联系过程中的相关自然人。您可能是法定代表人、董事、监事、高级管理人员、业务或部门负责人、业务对接人、客户经理、商务代表、销售人员、文件制作或审核人员或在商务沟通中承担其他类似角色（“商务联系人”）。

Please note that this Policy only applies to business communications in the context of our business processes. In this scenario, you are an individual in your business capacity involved in the process of establishing or maintaining business relationship between the entity you represent or belong to (i.e. our business partner, service providers or other interested parties) and MRBJ. You may be a legal representative, director, supervisor, senior management officer, department manager, business contact point, customer manager, commercial representative, salesperson, document producer or reviewer, or anyone who assumes similar roles in business communications ("Business Contact").

请您注意，我们是慕尼黑再保险公司在中國大陸地区设立的分公司，本政策基于中国大陆的个人信息保护相关法律法规。如您希望查询慕尼黑再保险公司基于《通用数据保护条例》(GDPR)发布的相关隐私声明，欢迎使用以下链接查阅：

Please note that we are a branch office of Munich Reinsurance Company in China mainland and this Policy is based on Personal Information Protection Laws and Regulations in China mainland. If you wish to find the privacy statement issued by Munich Reinsurance Company which is based on the General Data Protection Regulation (GDPR), you are welcome to use the following link:

[Data Protection Information | Munich Re \(https://www.munichre.com/en/general/privacy.html \)](https://www.munichre.com/en/general/privacy.html)

一、定义

I. Definitions

本政策中的以下名词的具体含义为：

The following terms in this Policy are defined as follows:

“个人信息保护相关法律法规”：指在中华人民共和国境内（不含香港，澳门以及台湾地区，下同）颁布的与个人信息保护或隐私保护有关的任何适用法律、规则、条例、法令、法规或其他法则、命令、授权或决议，以及任何经修订、扩展、废除和替换或重新颁布的实施、衍生或相关的立法、规则和条例，包括但不限于《中华人民共和国民法典》、《中华人民共和国个人信息保护法》、《中华人民共和国网络安全法》、《中华人民共和国数据安全法》、《网络数据安全管理条例》《儿童个人信息网络保护规定》、《数据出境安全评估办法》、《银行保险机构数据安全管理办法》等。

"Personal Information Protection Laws and Regulations": means any applicable laws, statutes, rules, regulations, ordinances, directives or other government orders, authorizations or resolutions relating to the protection of personal information or the protection of privacy enacted within the territory of the People's Republic of China (excluding Hong Kong, Macao, and Taiwan region, also referred to as "China mainland"), as well as any amended, extended, replacement or re-enactment of legislation, rules and regulations, including but not limited to the *Civil Code of the People's Republic of China, the Personal Information Protection Law of the People's Republic of China, the Cyber Security Law of the People's Republic of China, the Data Security Law of the People's Republic of China, the Regulations on the Administration of Network Data Security, the Provisions on the Protection of Children's Personal Information Networks, and the Data Exit Security Assessment Measures, Measures for Data Security Management of Banking and Insurance Institutions, etc.*

“个人信息”：以电子或者其他方式记录的与已识别或者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.

“个人信息处理者”：指在个人信息处理活动中自主决定处理目的、处理方式的组织、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.

“受托处理者”：指向个人信息处理者提供委托处理服务的组织、个人。

"Entrusted Processor" refers to any organization or individual that provide entrusted processing services to Personal Information Processors.

“敏感个人信息”：一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。**请您注意**，我们会在本政策中将敏感个人信息以**粗体下划线**形式标记。同时，我们可能不时根据个人信息保护相关法律法规的变化或澄清对敏感个人信息的具体种类进行适时调整。

"Sensitive personal information" refers to personal information that, once leaked or illegally used, will easily lead to infringement of the human dignity or harm to the personal or property safety of a natural person, including biometric recognition, religious belief, specific identity, medical and health, financial account, personal location tracking and other information of a natural person, as well as any personal information of a minor under the age of 14. **Please note** that we will mark sensitive personal information as **bold and underlined** in this Policy. At the same time, we may from time to time make adjustments to the specific categories of sensitive personal information in accordance with changes or clarifications in Personal Information Protection Laws and Regulations.

“儿童”：本政策中亦称不满十四周岁未成年人为“儿童”。

"Child" / "Children": Minors under the age of 14 are also referred to as "child" or "children" in this Policy.

“处理”：包括个人信息的收集、存储、使用、加工、传输、提供、公开、删除等。

"Processing": includes the collection, storage, use, processing, transmission, provision, disclosure, and deletion of personal information

“匿名化”：是指个人信息经过处理无法识别特定自然人且不能复原的过程。

"Anonymization" refers to the process in which any personal information is processed to the extent that it cannot identify a specific natural person and cannot be restored to its original state.

本政策中未定义的相关名词，如无特别说明，与个人信息保护相关法律法规的含义保持一致。

Any terms not defined in this Policy, unless specifically stated, are consistent with the meaning of Personal Information Protection Laws and Regulations.

二、谁负责处理您的个人信息

我们是慕尼黑再保险公司北京分公司，办公地址为：中国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。

We are Munich Reinsurance Company Beijing Branch, with an office address at 20th Floor, Room 4801A/4801/4803/4804 of 48th Floor, Tower C, No. 2, Jianwai Avenue, Chaoyang District, Beijing, P.R.C.

联系方式：

Contact Information:

电话: +86 10 8591 9999(财产险); + 86 10 6584 8888(人寿及健康险)

Tel: +86 10 8591 9999 (Property & Casualty); + 86 10 6584 8888 (Life & Health)

传真: +86 10 8591 9966

Fax: +86 10 8591 9966

三、我们如何收集和使用您的个人信息

III. How do we collect and use your personal information?

(一) 我们收集个人信息的渠道

通常而言，我们会在与您代表或所属的机构开展的商务沟通及合作的过程中，收集由您主动提供或者由您代表或所属的机构提供您的个人信息。我们还有可能从公开信息（例如，公司公开披露的信息或文件，媒体报道或互联网信息）中获取您的个人信息，或者从慕再集团内其他机构处收到您的个人信息。

Generally, we collect personal information from you or from the entity you represent or belong to in the course of business communications. We may also receive your personal information from publicly available information (e.g., information or documents publicly disclosed by the company, media reports or public information on the Internet) or receive your personal information from other organizations within the Munich Re Group.

(二) 我们使用您个人信息的目的和方式

(ii) Purpose and method of our processing of your personal information

我们仅出于业务经营中与合作伙伴、供应商或其他利益方之间开展商务沟通合作或关系维护目的并采用与上述目的妥为适宜的方式在必要范围内处理您的个人信息。上述目的具体而言包括：

We will only process your personal information to the extent necessary for the purposes of business communication, cooperation or relationship maintenance with our business partner, service providers or other interested parties in the course of our business operations, and in a manner that is appropriate for those purposes. These purposes include, in particular:

1. 为了满足具体业务合作的沟通。我们可能需要处理您的个人信息从而联系您代表或所属的机构，开展针对现有或潜在合作的沟通、谈判、协议执行或终止。特别地，在某些情况下，我们需要处理您的个人信息从而确认双方之间就业务合作及沟通所交互的相关文件（例如协议、账单、或细目）来源以及可靠性。

To conduct communications for specific business collaborations. We may need to process your personal information in order to contact the entity we do business with to communicate, negotiate, perform or terminate an agreement for existing or potential business arrangement. In particular, in some cases, we may need to process your personal information in order to identify the origin and trustworthiness of documents (e.g., agreements, invoices, or bordereaux) exchanged between the parties in connection with the business cooperation and communication.

2. 合作关系维护。在就具体业务合作之外，我们可能还会处理您的个人信息以维护商业关系。例如：
Business relationship maintenance. We may also process your personal information to maintain general business relationships in addition to specific businesses communications. For example:

- 1) 发送宣传册、新闻、信息简报、或与再保险业务相关的其他材料；
Send business related brochures, newsletters, information bulletins, or other material in similar nature;
- 2) 服务满意度调查、意见建议收集等调研活动；
Surveys for service satisfaction or collecting other opinions and suggestions;
- 3) 发送线上或线下培训、会议或其他活动的信息及邀请，并策划、执行开展上述活动
Send out information or invitations for online or offline training, conferences or other commercial events, plan and organize such activities.
- 4) 活动影像的留存及内外部展示或宣传活动；
audio-visual recordings of an commercial event for purpose of documentation or internal and external display or promotional activities;
- 5) 向合作伙伴表达感谢、发送数字或纸质的贺卡，比如在节日或者公司庆典时；或
Expressing appreciation, sending digital or postal greeting cards, such as on holidays or company anniversaries; or
- 6) 处理投诉或举报。
Handling of complaints or report.

3. 法律法规要求或允许的其他合理目的和方式。

Other reasonable purposes and means required or permitted by laws and regulations.

(三) 可能会涉及您的哪些个人信息

(iii) What personal information might be involved?

1. 我们可能收集的个人信息在通常情况下主要是您的商务联系信息，具体而言可能包括您的姓名、签名、印章印鉴、电话、电子邮箱地址、工作地址、工作单位和/或职位、职业资格资质等。

The personal information we may collect is generally your business contact information, which may specifically include your name, **signature**, **seal**, telephone number, e-mail address, work address, employer and/or position, and professional qualifications.

2. 我们可能会在活动现场对活动进行整体或专门场景的影音记录，其中可能会拍摄或记录到您的可辨别的个人形象、影像或声音（单独或与他人一起）。

We may make audio/visual recordings of the event as a whole or of individual sections at an event, in which your recognizable **personal appearance**, **image** or **voice** (alone or with others) may be captured or recorded.

3. 当活动位于中华人民共和国境外，而您在参加前需要我们境外关联机构出具邀请函或采取其他行为以办理您的签证等安排时，我们会配合您将您提供的出生日期及护照号等必要个人信息递交给邀请函出具机构。

When the commercial event are located outside of the China mainland, and you need an invitation letter from our overseas affiliates or other similar documents in order to obtain your travel visa, we will cooperate with you to submit the necessary personal information such as your date of birth and passport number to the entity that issues such invitation letter.

上述列举目的在于尽量向您展示我们收集并处理个人信息的类别范围，但并不代表我们会在每一业务场景下，均试图收集以上所有的个人信息类别，也不代表我们会试图收集超过必要详细程度的个人信息。我们将始终秉持必要性原则，确定处理个人信息的范围、详略程度或采取的匿名化、去标识化或脱敏处理方式。个人信息在经过匿名化处理后，将不再属于个人信息；个人信息经过去标识化或脱敏处理后，个人信息的敏感程度可能会降低。

The above list is intended to help you understand the potential range of your personal information that we may receive and further process, but it does not mean that we will attempt to collect all of the above categories of personal information in every business scenario, nor does it mean that we will attempt to collect personal information in any enhanced level of detail that is unnecessary. We will always adhere to the principle of necessity and determine the scope, level of detail, and types of technology to be applied when processing your personal information such as anonymization, de-identification, or desensitization. When personal information is anonymized, it is no longer personal information, and when personal information is de-identified or desensitized, the sensitivity of the personal information may be reduced.

(四) 处理您敏感个人信息的特别说明

(iv) Special explanation for handling your sensitive personal information

我们对该敏感个人信息的处理确为达成处理目的所必须，我们不会超出必要范围处理您的敏感个人信息。Our processing of this sensitive personal information is necessary to fulfil the purposes for which it was processed and we will not process your sensitive personal information beyond what is necessary.

在特定情形下，我们可能会处理您的签名或印章印鉴信息以确认相关文件被妥为签署或者该文件具有必要的可信程度。如果您以手签的方式提供签名或采用特制的个人印章印鉴，该类信息有可能被认定为敏感个人信息。In certain circumstances, we may process your **signature** or **seal** information to confirm that a document has been properly signed or that the document has the necessary level of trustworthiness. If you provide your signature by hand or use a customized personal seal, such information may be considered sensitive personal information.

就您的可辨认的个人形象、影像或声音（单独或与他人一起），如果您不愿意在特定或全部场合被记录到影音记录中，我们建议您当场告知摄影或摄像人员并避免参加摄影摄像行为。请您知悉：在摄影或摄像完成后，出于留存活动记录的必要以及涉及其他人员和现场环境等诸多原因，我们可能难以将您可识别的个人形象、影像或声音进行删除。当然，如果您后续向我们书面告知您决定撤回您对我们使用您可辨认的个人形象、影像或声音的同意，我们将在收到您的书面告知后，不在新的对外展示或宣传活动中展示您的可识别的个人形象、影像或声音。但是，出于活动记录的完整性及区分、删除个体记录存在显著技术难度等原因，我们依然需要出于内部管理目的存储包含涉及您的可识别个人形象、影像或声音的影像记录。

We recommend that you inform the photographer or videographer on the spot and refrain from participating in the photography or videotaping if you do not wish to have recognizable **personal appearance, image or voice** (alone or with others) recorded in the audio-visual recordings. **Please be aware that** it may be difficult for us to remove you from the recordings after the photography or videotaping has been completed. The difficulties may come from a number of reasons, including the need to keep a record of the event and the involvement of other people and the environment. Of course, if you subsequently notify us in writing of your decision to withdraw your consent to our use of your recognizable personal appearance, image or voice, we will not display them in any new publicity or promotional occasions. However, we may still need to store the original footage for internal management purposes due to the integrity of the record of the activity and the significant technical difficulty in distinguishing and deleting individual records.

四、我们如何对外提供您的个人信息

IV. How do we provide your personal information to other entities?

(一) 委托处理

(i) to entrusted processor

为了开展高水平的经营管理活动，我们可能会在特定场景下，根据慕再集团的安排，委托集团内的关联机构提供管理、专业知识或科技方面的支持。在这一过程中，该机构可能会基于我们的授权在约定的范围内以合格的保密和安全措施标准来处理您的个人信息。同时，慕再集团亦可能会安排外部供应商针对特定需求提供服务。您可以通过以下链接查阅慕再集团的外部供应商类别清单：

In order to conduct high quality business management, we may, in certain scenarios, entrust an affiliated organization within the Munich Re Group to provide management, expertise or technological support. In this process, a designated organization may process your personal information based on our authorization and within the agreed scope and with qualified standards of confidentiality and security measures. In certain cases, Munich Re Insurance Company uses external service providers to meet our contractual and legal duties. The categories of service providers can be found here:

List of category of service providers

(https://www.munichre.com/content/dam/munichre/contentlounge/website-pieces/documents/Dienstleisterliste_Datenschutzgrundverordnung_en_20180522.pdf/_jcr_content/renditions/original./Dienstleisterliste_Datenschutzgrundverordnung_en_20180522.pdf)

此外，某些活动的准备和执行过程中的某些事项或服务可能由我们委托的外部供应商提供（例如商务活动现场的摄影摄像）。对我们委托处理个人信息的公司、组织和个人，我们会负责约束其行为，要求他们按照我们的要求、本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。

In addition, certain matters or services in the preparation and execution of certain events may be provided by external service providers contracted by us (e.g., photography and videography at business events). We are responsible for regulating the conduct of such service providers to whom we have entrusted the processing of personal information. We will request them to process personal information in accordance with our requirements, this Policy and any other relevant confidentiality and security measures.

(二) 向其他个人信息处理者提供您的个人信息
(ii) to other personal information processors

我们不会向其他个人信息处理者提供您的个人信息，除非（1）存在您的必要同意或授权，或（2）根据适用的法律法规、法律程序的要求、行政执法部门的要求或司法部门要求；（3）在涉及合并、分立、收购、资产转让或类似的交易时，如涉及到个人信息转移，我们提前向您告知接收信息机构的名称和联系方式，并要求新的持有您个人信息的机构继续受同等约束，继续履行原先由我们承担的个人信息举报义务。否则，我们将要求该机构重新向您征求任何必要的同意或授权。

We will not provide your personal information to other personal information processors unless (1) there is necessary consent or authorization from you, or (2) in accordance with applicable laws and regulations, requirements of legal proceedings, requirements of administrative law enforcement authorities or requirements of the judiciary; or (3) in the event of a merger, division, acquisition, transfer of assets, or similar transaction that involves the transfer of personal information, we will inform you of the name and contact details of the receiving entity in advance and require that the new entity holding your personal information continue to be equally bound by this Policy and to continue to fulfil the personal information processing obligations originally assumed by us. Otherwise, we will require the entity to seek any necessary consent or authorization from you again.

(三) 公开披露
(iii) public disclosure

我们不会公开披露您的个人信息，除非（1）存在您的必要同意或授权，或（2）根据适用的法律法规、法律程序的要求、行政执法部门的要求或司法部门要求的情况下，我们可能会依据所要求的个人信息类型和披露方式公开披露您的个人信息。

We will not publicly disclose your personal information unless (1) there is necessary consent or authorization from you, or (2) in accordance with applicable laws and regulations, requirements of legal process, requirements of administrative law enforcement authorities, or requirements of the judiciary, in which case we may publicly disclose your personal information in accordance with the scope and process required.

五、我们如何存储、保护您的个人信息

V. How do we store and protect your personal information?

（一）我们将按照适用的法律法规之要求在中华人民共和国境内收集和产生的个人信息，存储在中华人民共和国境内。除非满足适用的个人信息保护相关法律法规要求的必要程序，我们不会向境外传输您的个人信息。但您因个人或家庭事务开展包括个人信息跨境在内的个人信息处理行为，不在本条范围之内。

We will store in China mainland the personal information collected and generated within China mainland in accordance with the requirements of applicable laws and regulations. We will not transfer your personal information outside of the People's Republic of China unless necessary procedures required by Personal Information Protection Laws and Regulations are met. However, cross border transfer of personal information or other processing activities conducted by yourself due to your personal or family affairs are not covered by this section.

（二）除法律法规另有规定外，我们对您的个人信息的保存期限为实现本政策所描述处理目的所必要的最短时间。但请您理解，考虑到各场景下不同的业务需求和处理目的以及法律法规及监管规定对于金融机构业务记录保存最短时限的要求，我们可能难以确定对特定类别个人信息的具体保存期限，在此情况下个人信息保存期限将以满足处理目的以及所有适用的法律法规及监管规定的原则确定。

Except as otherwise provided by laws and regulations, we will keep your personal information for the shortest period of time necessary to achieve the processing purposes described in this Policy. However,

please understand that given the different business needs and purposes of processing in different scenario, as well as the different requirements from laws, regulations and supervisory provisions on the minimum time required for the retention of business records, it may be difficult for us to determine a specific retention period for a particular category of personal information. In such case the retention period of personal information will be determined in a manner that satisfies the purposes of processing and all applicable laws, regulations and supervisory provisions.

超出保存期限后，我们会对您的个人信息进行删除或者匿名化处理。如果未进行匿名化处理且删除个人信息从技术上难以实现的，我们将停止除存储和采取必要的安全保护措施之外的处理。

After the retention period has expired, we will delete or anonymize your personal information. If anonymization is not carried out and deletion of personal information is technically difficult, we will cease the processing except for storage and necessary security measures.

(三) 我们将对您的个人信息进行适当管理及保护，我们将使用恰当的安全防护措施保护您的个人信息，防止数据遭到泄露、篡改、或丢失。但请您理解，任何数据存储或传输方法在现有技术水平和网络环境下都无法确保万无一失。

We will manage and protect your personal information appropriately, and we will use appropriate security measures to protect your personal information from leakage, being tempered with, or data loss. However, please understand that no data storage or transmission method can be guaranteed as absolutely safe under the current level of technology and network environment.

(四) 如果不幸发生个人信息安全事件，我们将按照法律法规的要求，在必要时及时向您将事件情况以邮件、信函、电话或其他方式告知。难以逐一告知的个人信息主体，我们会采取合理、有效的方式发布公告。同时，我们将按照监管部门的要求，主动上报个人信息安全事件信息及处置情况。

In the unfortunate event that a personal information security incident occurs, we will promptly inform you of the incident by e-mail, letter, telephone or other means as necessary in accordance with laws and regulations. If it is difficult to inform you individually, we will take a reasonable and effective way to issue a public announcement. At the same time, we will report information on personal information security incidents and their disposition in accordance with the requirements of the supervisory authorities.

六、我们如何保护儿童的个人信息

VI. How do we protect children's personal information?

儿童不能作为本政策中提及的商务联系人，我们不与儿童开展任何商务联络。同时，我们不会主动邀请任何儿童参加本政策所提及的商业活动。

Children cannot be business contacts and we do not carry out any business communication with children. In addition, we will not actively invite any child to our commercial activities or events mentioned in this Policy.

七、您的个人信息权利及如何联系我们

VII. Your personal information rights and how to contact us

(一) 我们尊重您的隐私及个人信息权利，您有权按照个人信息保护相关法律法规向我们提出查阅、复制、转移、更正、补充、删除、限制处理您的个人信息以及撤回同意的要求，我们将尽力配合及响应。

We respect your privacy and personal information rights, you have the right to access, copy, transfer, correct, supplement, delete, restrict the processing of your personal information and withdraw your consent, etc. in accordance with the laws and regulations, and we will try our best to properly respond to your request.

请您注意， Please note that

1. 通常而言，如果我们直接收集您的个人信息，我们会在收集您的个人信息前以适宜方式对您进行告知并征得您的同意；如果您代表或所属的机构向我们提供了您的个人信息，我们依赖上述提供信息的机构以适宜方式对您进行告知并征得您的同意。但是，根据法律法规的规定，如果存在以下情形，处理您的个人信息将不需要您的同意：为订立、履行个人作为一方当事人的合同所必需，或者按照依法制定的劳动规章制度和依法签订的集体合同实施人力资源管理所必需；为履行法定职责或者法定义务所必需；为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；依照法律规定在合理的范围内处理个人自行公开或者其他已经合法公开的个人信息；法律、行政法规规定的其他情形。如存在以上您的个人信息的处理并非基于您的同意的情况，我们无法确保能够完全响应您的某些权利要求（例如删除、撤回或变更同意）。

In general, if we collect your personal information directly, we will inform you in an appropriate manner and obtain your consent before collecting your personal information. If the entity you represent or belong to provides your personal information to us, we rely on such entity to inform you in an appropriate manner and obtain your consent. However, in accordance with laws and regulations, your consent is not necessary and therefore may not be obtained where (1) it is necessary for the conclusion or performance of a contract to which the individual is a contracting party, or where it is necessary for carrying out human resources management under an employment policy legally established or a collective contract legally concluded; (2) it is necessary for performing a statutory responsibility or statutory obligation; (3) it is necessary for responding to a public health emergency, or for protecting the life, health or property safety of the natural person in the case of an emergency; (4) the personal information is processed within a reasonable scope to carry out any news reporting, supervision by public opinions or any other activity for public interest purposes; (5) the personal information, which has already been disclosed by the individual or otherwise legally disclosed, is processed within a reasonable scope and in accordance with this Law; (6) Any other circumstance as provided by law or administrative regulations. In cases where the processing of your personal information is not based on your consent, we cannot ensure that we will be able to fully respond to some of your requests (e.g., deletion, withdrawal or change of consent).

2. 由于各种原因，我们可能难以改变、调整或者消除某些基于您此前同意或其他合法性基础已经进行或完成的个人信息处理活动的效力或后续影响。

For a variety of reasons, it may be difficult for us to change, rescind or eliminate the effects or subsequent impact of certain personal information processing activities that have already been performed or completed based on your prior consent or other lawful basis.

3. 若我们决定响应您的权利要求，我们的行为及其效果将可能仅限于我们作为个人信息处理者的权限范围。如果您希望我们配合您向其他机构或个人提出权利要求，我们将努力在合理范围内协助您通知与我们有直接合作关系的其他个人信息处理者关于您的权利行使要求，但请您理解我们无法保证您的权利要求的结果。

If we decide to respond to your request, our actions and their effects may be limited within the scope of our capacity as personal information processor. If you would like us to assist you in exercise your right against another personal information processor, we will endeavor to reasonably assist you in notifying other personal information processor with whom we have a direct relationship about your request to exercise of your right, but please understand that we cannot guarantee the outcome of your request in this situation.

4. 如果您向我们提出个人信息转移请求且符合以下全部条件，我们将为您指定的其他机构访问或获取您的个人信息提供途径：（1）我们能够验证您的真实身份；（2）请求转移的是您同意提供的或者基于合同收集的个人信息；（3）转移个人信息具备技术可行性；（4）转移个人信息不损害其他人(包括我

们在内)的合法权益。此外，如果您转移个人信息次数等明显超出合理范围的，我们可能需要根据转移个人信息的成本向您收取必要费用。

We will provide a means for other institution designated by you to access or obtain your personal information if you make a request to us for the transfer of personal information and all of the following conditions are met: (1) we are able to verify your identity; (2) the personal information is collected based on your consent; (3) the transfer of the personal information is technically feasible; (4) the transfer of the personal information does not jeopardize the legitimate rights and interests of others (including us). In addition, if the number of times you transfer your personal information is clearly beyond a reasonable range, we may need to charge you with a necessary fee based on the cost of transferring your personal information.

(二) 如果您希望行使任何以上权利，或者对我们的个人信息保护政策或实践有任何疑问、投诉或情况反馈，您可以直接与我们负责与您联系的同事联系，或者采用以下方式联系我们，我们将对您的邮件或信件及时予以回应。为保护您的隐私和安全，我们可能会要求验证您的身份并保留请求及处理记录。

If you wish to exercise any of the above rights, or have any questions, complaints or feedback about our personal information protection policies or practices, you may contact us using the following methods and we will respond to your email or letter promptly. To protect your privacy and security, we may ask to verify your identity and keep records of requests and processing.

1. 以电子邮件的形式发送至我们的个人信息保护邮箱：Data Compliance-Beijing-MR (p0060014478@munichre.com.cn)，或者

E-mail to:

Data Compliance-Beijing-MR (p0060014478@munichre.com.cn), or

2. 邮寄至：慕尼黑再保险公司北京分公司 数据保护官，中国北京市朝阳区建外大街 2 号银泰中心写字楼 C 座 4801 邮编：100022。

Mail to:

Data Protection Officer, Munich Reinsurance Company, Beijing Branch;
Room4801, Tower C, Beijing Yintai Center, No. 2 Jianwai Avenue, Chaoyang District, Beijing,
100022, P.R.China.

八、本隐私政策的更新

VIII. Updates to this Privacy Policy

随着个人信息保护相关法律法规的出台、修订或澄清、慕再集团的进一步要求或者我们业务的不断发展，本政策可能会不时更新。

This Policy may be updated from time to time in line with the developments of Personal Information Protection Laws and Regulations, further requirements of our Group or the developments of our business needs

本政策首页所示日期为最新一次更新生效日期。

The date shown on the front page of this Policy is the effective date of the most recent update.