

MEN Privacy Policy

MEN Intelligent Technology Co., Ltd. attach great importance to your privacy and your trust in us. This Privacy Policy describes how we collect, use and disclose your personal information.

We continue to comply with local privacy policies and the principles described in this policy, and we are determined to protect your personal data in full accordance with applicable regulations at all times.

1. Introduction

MEN Intelligent Technology Co., Ltd. respects the privacy of its customers, business partners and employees and recognizes the need for appropriate protection and management of personal information provided. Should there be any conflict between the Privacy Shield principles and this Policy, the Privacy Shield principles will prevail. This Policy outlines the general practices for implementing the requirements of the Privacy Shield in connection with personal data that is transferred, including the types of information that is collected and transferred, how it is used.

2. Scope

This privacy policy applies to your activities to access or use our websites, applications and other services, including activities that refer to or link to this Privacy Policy (each activity is referred to as a "service").

Other privacy statements, terms or notices we provide to you may supplement this privacy policy. Men Intelligent Technology Co., Ltd. owns or manages the services described herein and is the primary controller of your personal information provided to, collected by or for the services.

In the registration process of our products and services and other registration forms, we will indicate the type of personal information you need to provide and the type of personal information we request. You may choose not to submit the information we requested, but that may restrict or prevent our company from providing services to you.

3. Definitions

For purpose of this Policy, the following definitions shall apply:

"Personal data" and "personal information" refer to data about an identified or identifiable individual that are within the scope, and recorded in any form.

"Processing" of personal data means any operation or set of operations which is performed upon personal data, whether or not by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure or dissemination, and erasure or destruction.

"Controller" means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of personal data.

“Agent” means any third party processor that collects and/or uses personal information provided by our company to perform tasks on behalf of and under the instructions of our company. An example of an Agent is a provider of IT services that processes personal information in order to assist or support our company’s employees with the use of its products.

“Sensitive personal information” means personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership of the individual or where received from third party data that is treated as personally sensitive by the third party.

“Sensitive personal information” also includes ideological views or activities and information on social security measures or administrative or criminal proceedings and sanctions, which are treated outside pending proceedings.

4. Privacy Principles

4.1. Notice

Where our company collects personal information, it will inform these individuals about the purposes for which they collect and use personal information about them, the types or identity of third parties to which our company discloses that information, the purposes for which it does so, the choices and means our company offers individuals for limiting the use and disclosure of their personal information, and to access their personal information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to our company, or as soon as practicable thereafter, and in any event before our company uses the information for a purpose other than that for which it was originally collected.

4.2. Choice

For sensitive personal information, our company will give individuals the opportunity to affirmatively and explicitly consent (opt-in) to the disclosure of the information to a non-agent third party acting as a controller or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. our company will provide individuals with reasonable mechanisms to exercise their choices.

4.3. Accountability for Onward Transfer

our company will transfer personal information to Agents only for limited and specific purposes and obtain contractual assurances from its Agents that they will safeguard personal information consistent with this Policy and that they will provide at least the same level of protection as is required by the relevant Privacy Shield principles. our company recognizes its responsibility and potential liability for onward transfers to Agents. Where our company has knowledge that an Agent is using or disclosing personal information in a manner contrary to this Policy and/or the level of protection as required by the Principles, our company will take reasonable steps to prevent, remedy or stop the use or disclosure. If our company transfers personal information to non-agent third parties acting as a controller, our company will apply the Notice and Choice Principles and will obtain contractual assurance from these parties that they will provide the same level of protection as is required under the Principles.

4.4. Access

Upon request, and to the fullest extent allowed under law, our company will grant individuals reasonable

access to personal information that it holds about them. In addition, our company will take reasonable steps to permit individuals to correct, amend, or delete information that is demonstrated to be inaccurate, incomplete or processed in violation of the Principles.

4.5. Security

our company will take reasonable precautions to protect personal information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the personal data.

4.6. Data Integrity and Purpose Limitation

our company will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual (see 4.2.). our company will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current. our company will adhere to the Principles as long as it retains personal information received under its Privacy Shield certification.

4.7. Recourse, Enforcement and Liability

our company utilizes the self-assessment approach to assure its compliance with this Privacy Policy. our company periodically verifies that this Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and in conformity with the Privacy Shield principles. our company encourages interested persons to raise any concerns with it using the contact information below. our company will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy.

5. Limitations and Exceptions

Adherence to these Principles may be limited: (a) to the extent necessary to meet applicable national security, public interest, or law enforcement requirements, e.g. in the course of lawful requests by public authorities (b) by statute, government regulation, or case law that creates conflicting obligations or explicit authorizations, provided that, in exercising any such authorization, an organization can demonstrate that its non-compliance with the Principles is limited to the extent necessary to meet the overriding legitimate interests furthered by such authorization; or (c) if the effect of the General Data Protection Regulation or Member State law is to allow exceptions or derogations, provided such exceptions or derogations are applied in comparable contexts.

If our company determines that any person in its employ is in violation of this Privacy Policy such person will be subject to disciplinary process.

6. Dispute Resolution

Any questions or concerns regarding the use or disclosure of personal information should be directed to the Data Privacy Officer at the address given below. our company will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this Policy.

Where a complaint cannot be resolved by any of the before mentioned recourse mechanisms,

individuals have a right to invoke binding arbitration under the Privacy Shield Panel as recourse mechanism of “last resort”.

7. Contact Information

Questions or comments regarding this Policy should be submitted to our company by e-mail or mail as follows:

info@men-machine.com

or by mail

c/o our company Data Privacy Officer

Floor 1, Block D, Kangsite Industrial Park, No.117 Xueye Road, Xinbei District, Changzhou City, Jiangsu Province.

8. Changes to this Policy

This Policy may be amended from time to time, consistent with the requirements of the Privacy Shield principles. Appropriate public notice will be given concerning such amendments.