

# Privacy Notice

# 隐私保护声明

22 September 2025

2025 年 9 月 22 日

## Introduction 序言

### Who we are 本集团介绍

Lenton Group is a global logistics and transportation company that specializes in transportation by air, sea and land, supply chain solutions, warehousing and distribution, and e-commerce fulfilment. Our wide range of services comprise a variety of express and cargo-based economy and time-critical services, dangerous good handling, clinical trial logistic and cold chain management. Lenton Group is an Asian-based, cross-border service provider with an extensive network of owned-offices and trusted partners serving more than +220 countries / territories worldwide.

Lenton 集团是一家全球物流及运输公司，专注于空运、海运和陆运，供应链解决方案，仓储与配送，以及电子商务履约服务。我们的广泛服务涵盖各种快递及货运类经济型和时效关键型服务，危险品处理，临床试验物流及冷链管理。Lenton 集团是一家以亚洲为基础的跨境服务提供商，拥有广泛的自有办事处及可信赖合作伙伴网络，服务覆盖全球 220 多个国家与地区。

### Privacy Notice Overview 隐私声明概述

Lenton Group and its Business Units (hereafter “Lenton Group”, “Lenton”, “we”) is committed to Personal Data protection. This Privacy Notice (“Notice”) sets out the principles and guidelines we apply to protect your Personal Data. This Notice is based on globally accepted, basic principles on data protection and is intended to provide you with an understanding of what Personal Data is collected and how it is used.

Lenton 集团及其业务单元（以下简称“Lenton 集团”、“Lenton”、“我们”）致力于保护个人数据。本隐私声明（以下简称“声明”）阐述了我们保护您个人数据所适用的原则和指导方针。本声明基于全球公认的基础数据保护原则，旨在帮助您了解我们所收集的个人数据以及其使用方式。

### Scope 适用范围

This Notice applies globally to all processing of Personal Data by Lenton Group and its Business Units, except where a Business Unit has adopted its own privacy notice that has been reviewed and confirmed by the Group Data Protection Officer (DPO) as consistent with the principles set forth herein. It governs the processing of Personal Data relating to applicants, business contacts (including clients and prospective clients), customers, suppliers, and other Third Parties.

本隐私声明适用于 Lenton 集团及其业务单元对个人数据的全球范围内处理，除非某业务单元已采用经集团数据保护官（DPO）审核并确认符合本声明原则的独立隐私声明。本声明适用于与申请人、业务联系人（包括客户及潜在客户）、客户、供应商及其他第三方相关的个人数据处理。

## Definitions 定义

### Personal Data 个人数据

Personal Data refers to any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier.

个人数据是指任何与已识别或可识别的自然人相关的信息。可识别的自然人是指能够直接或间接识别的个人，尤其是通过姓名、身份证号码、位置信息、在线标识符等标识符。

For instance, Personal Data include a person's name, personal or professional email address, personal or professional phone number, identifiers (such as login details like an account number or password), occupation, and similar details. If we combine your Personal Data with other information we hold, we will treat the linked data as Personal Data as well.

例如，个人数据包括个人姓名、个人或职业电子邮件地址、个人或职业电话号码、标识符（如账户号码或密码等登录信息）、职业及类似信息。如果我们将您的个人数据与我们持有的其他信息结合处理，则相关联的数据也将视为个人数据。

#### Examples of Personal Data: 个人数据示例:

- Names 姓名
- Government-issued identification numbers (social security and driver's license numbers, etc.) 政府颁发的身份证件号码（社会保障号码、驾驶证号码等）
- Addresses 地址
- Phone numbers 电话号码
- Email addresses 电子邮件地址
- Photos 照片

## Processing 处理

Processing refers to any operation performed on Personal Data, with or without the use of automated systems, such as to collect, store, organize, retain, archive, record, view, modify, adapt, alter, query, use, retrieve, forward, transmit, combine or delete data.

“处理”指对个人数据进行的任何操作，无论是否利用自动化系统，包括收集、存储、组织、保留、归档、记录、查看、修改、调整、更改、查询、使用、检索、转发、传输、合并或删除。

### Examples of processing 处理示例：

- Storing information in databases
- 在数据库中存储信息
- Transferring information from one database to another
- 将信息从一个数据库转移至另一个数据库

### Notes 备注：

Data that has been anonymized such that individuals cannot be identified does not constitute Personal Data. The transportation of physical media (such as documents, computers, etc.) containing Personal Data does not constitute processing of that Personal Data.

已匿名化且无法识别个人身份的数据不构成个人数据。携带包含个人数据的实体载体（如文件、计算机等）的运输，不视为对该个人数据的处理。

## Cookies 暂存数据

Cookies refer to small text files that are placed on a user's device (such as a computer, smartphone, or tablet) when they visit a website. Cookies are used to make websites work more efficiently, as well as to provide information to the owners of the site. They can be used to remember user preferences, track user behaviour, and personalize the user experience. Cookies can be session-based (temporary) or persistent (stored for a longer period).

Cookie 是用户访问网站时存储于其设备（如计算机、智能手机或平板电脑）上的小型文本文件。Cookie 用于提高网站运行效率，并向网站所有者提供相关信息。可用于记忆用户偏好、追踪用户行为及个性化用户体验。Cookies 可为基于会话的（临时）或持久性的（长时间存储）。

## Third Party 第三方

A Third Party refers to any external individual, organization, or entity that is not directly affiliated with Lenton Group. This includes, but is not limited to, service providers, contractors, sub-contractors, business partners, and other entities with whom Lenton Group may share your Personal Data for specific purposes as outlined in this Notice. Third Parties are subject to their own privacy practices and procedures, and Lenton Group ensures that any transfer of Personal Data to these parties complies with applicable data protection laws and regulations.

“第三方”指任何与 Lenton 集团无直接关联的外部个人、组织或实体，包括但不限于服务提供商、承包商、分包商、业务合作伙伴及 Lenton 集团根据本声明为特定目的共享您个人数据的其他实体。第三方均拥有其自身的隐私政策和程序，Lenton 集团确保向其传输的个人数据符合适用的数据保护法律法规。

## What Personal Data we process 经处理的个人数据类型说明

| Processing Activity<br>处理活动                                       | Purpose<br>目的   | Legal Basis<br>法律依据   | Personal Data Processed<br>处理的个人数据   | Retention Period<br>保留期限              |
|---|---|---|--|---------------------------------------|
| Customer Service Investigation & Claims Management<br>客户服务调查与索赔管理 | Handling customer service inquiries and managing claims; evaluating business unit (BU) performance<br>处理客户服务查询及管理索赔; 评估业务单元 (BU) 绩效 | Contract performance (claims) and legitimate interest (performance measurement)<br>合同履行 (索赔) 及合法利益 (绩效评估) | Name, address, email, phone number, parcel number, collection request number, case number, free-text fields (e.g., parcel content)<br>姓名、地址、电子邮件、电话号码、包裹编号、取件请求编号、案件编号、自由文本字段 (例如包裹内容) | 3 years after case closure<br>案件结案后三年 |
| Parcel Delivery<br>包裹递送   | Shipment processing, tracking, delivery management<br>货物处理、追踪及配送管理  | Contract performance, legitimate interest<br>合同履行、合法权益  | Name, username, email, address, phone number, parcel number, date of birth, GPS coordinates, ID numbers, delivery instructions<br>姓名、用户名、电子邮件、地址、电话号码、包裹编号、出生日期、GPS 坐标、身份证号码、配送指示      | 3 years from shipment date<br>自发货日起三年 |
| Customs Processing<br>海关处理  | Duty/tax notifications and payments, proof of payment generation<br>关税/税款通知及缴纳, 付款凭证生成  | Legal obligation<br>法定义务  | Name, email, address, phone number, SMS, parcel number, IP address, parcel content and value<br>姓名、电子邮件、地址、电话号码、短信、包裹编号、IP 地址、包裹内容及价值  | 7 years<br>7 年                        |

| Processing Activity<br>处理活动              | Purpose<br>目的  | Legal Basis<br>法律依据  | Personal Data Processed<br>处理的个人数据  | Retention Period<br>保留期限  |
|--|--|--|---|---|
| Customer Interaction<br>客户互动             | Notifications, marketing, satisfaction surveys, profiling, loyalty programs, websites improvement, any type of customer interaction<br>通知、营销、满意度调查、用户画像、忠诚度计划、网站改进及任何形式的客户互动 | Contract performance, legitimate interest, consent<br>合同履行、合法权益、同意 | Name, email, address, phone number, parcel number, title, company, ID/passport numbers, HS code, login, gender, delivery and communication preferences, third-party data (e.g., neighbours), IP address, Cookies, local storage items, session storage items, your internet service provider, your browser type and operating system, the pages visited, the time spent on each page, and the sequence of pages accessed.<br>姓名、电子邮件、地址、电话号码、包裹编号、职称、公司、身份证/护照号码、海关编码、登录信息、性别、配送及通讯偏好、第三方数据（例如邻居）、IP 地址、Cookies、本地存储项目、会话存储项目、您的互联网服务提供商、浏览器类型及操作系统、访问页面、每页停留时间及访问顺序。 | 3 years after last interaction<br>最后一次互动后三年   |
| Sanctions & Embargo Screening<br>制裁与禁运筛查 | Screening against Denied Party Lists (DPLs), license requests, parcel blocking decisions<br>针对拒绝方名单（DPL）、许可申请及包裹拦截决定进行筛查   | Legal obligation<br>法定义务   | Name, email, address, phone number, parcel number, screening results (applies to consumers and employees)<br>姓名、电子邮件、地址、电话号码、包裹编号、筛查结果（适用于消费者及员工）   | 30 days in live DB, 30 days-2 years in restricted DB, 2-10 years in archive (restricted access)<br>活跃数据库保存 30 天，受限数据库保存 30 天至 2 年，档案库保存 2 年至 10 年（受限访问） |

| Processing Activity<br>处理活动                | Purpose<br>目的   | Legal Basis<br>法律依据         | Personal Data Processed<br>处理的个人数据   | Retention Period<br>保留期限  |
|--|---|-----------------------------|--|---|
| Export Control<br>出口管制                     | Verification of export authorizations and permits for dual-use goods<br>核查双用途商品的出口授权及许可 | Legal obligation<br>法定义务    | Name, address, parcel content (HS code), origin/destination countries, phone number<br>姓名、地址、包裹内容 (HS 编码)、起运地/目的地国家、电话号码 | 30 days in live DB, 30 days–2 years in restricted DB, 2–6 years in archive (restricted access)<br>活跃数据库保存 30 天，受限数据库保存 30 天至 2 年，档案库保存 2 年至 6 年（受限访问）   |
| Third Parties background checks<br>第三方背景调查 | Fight against child labour, illegal migrant work, corruption<br>防止童工、非法移民劳工及腐败          | Legal obligation<br>法定义务    | Name, address<br>姓名、地址   | 30 days in live DB, 30 days–2 years in restricted DB, 2–10 years in archive (restricted access)<br>活跃数据库保存 30 天，受限数据库保存 30 天至 2 年，档案库保存 2 年至 10 年（受限访问） |
| KPI Reporting<br>关键绩效指标报告                  | Sales, marketing, and operational analysis; performance measurement<br>销售、市场及运营分析；绩效衡量  | Legitimate interest<br>合法权益 | Name, email, address, phone number, parcel number<br>姓名、电子邮件、地址、电话号码、包裹编号  | 3 years (then anonymized if needed)<br>保存 3 年（如有需要，之后进行匿名处理）  |



| Processing Activity<br>处理活动 | Purpose<br>目的  | Legal Basis<br>法律依据  | Personal Data<br>Processed<br>处理的个人数据  | Retention Period<br>保留期限  |
|-----------------------------|--|--|--|---|
| Whistleblowing<br>举报        | Receiving, investigating, and closing whistleblowing alerts; statistical reporting<br>接收、调查和关闭举报警示；进行统计报告            | Legal obligation, legitimate interest<br>法律义务，合法权益   | Email, phone number, name, date/purpose of alert, any data provided during investigation<br>电子邮件、电话号码、姓名、警示的日期/目的，以及调查过程中提供的任何数据 | If the alert is not eligible: anonymized within 30 days<br>If there is no action triggered by the alert: anonymized within 2 months<br>If there is a legal/disciplinary action: retained until conclusion, then anonymized within 2 months (unless otherwise required)<br>若警示不符合条件：在 30 天内进行匿名化处理<br>若警示未引发任何行动：在 2 个月内进行匿名化处理<br>若实施法律或纪律处分：保留至结案，结案后于 2 个月内匿名化（法律另有要求者除外） |
| Recruitment<br>招聘           | Evaluate and process your application for employment with us, carry out right to work checks<br>评估并处理您的求职申请，进行工作资格核查 | Contract performance (employment contract), legitimate interests (to verify your suitability for our vacancies), legal obligation (right to work check)<br>合同履行（劳动合同）、合法权益（验证您是否符合岗位要求）、法律义务（工作资格核查） | Name, address, phone number, email address, CV, cover letter<br>姓名、地址、电话号码、电子邮件地址、简历、求职信   | 1 year after last interaction<br>自最后一次互动之日起 1 年   |

## The Third Parties we might share your Personal Data with 我们可能共享您个人数据的第三方

Lenton Group may transfer your Personal Data internally or externally under strict compliance with applicable data protection laws (e.g., European GDPR, Hong Kong PDPO, Chinese PIPL).

Lenton 集团可能在严格遵守适用数据保护法律（如欧洲 GDPR、香港 PDPO、中国 PIPL）的前提下，将您的个人数据进行内部或外部传输。

With your consent, for contractual necessity, for our legitimate interest, or to comply with regulatory obligations, your Personal Data may be transferred to countries outside of your location, including those with lower levels of data protection.

在获得您的同意、基于合同必要性、我们的合法权益或为遵守监管义务，您的个人数据可能会被传输至您所在地以外的国家，包括数据保护水平较低的国家。

Where we use Third Party service providers to assist us, your Personal Data may also be stored in accordance with their practices and procedures.

当我们使用第三方服务提供商协助时，您的个人数据也可能根据其相关惯例和程序进行存储。

Your Personal Data may be disclosed or transferred to:

您的个人数据可能会被披露或转移给：

- Lenton Group Business Units – only for business purposes such as performing the requested services and invoicing or for our legitimate interests.
- Lenton 集团业务单位——仅为业务目的，如履行所请求的服务和开具发票，或实现我们的合法目的。
- Third-party service providers for the performance of the services (e.g., logistics partners and technical service providers, including sub-contractors).
- 第三方服务提供商，以履行服务（例如物流合作伙伴和技术服务提供商，包括分包商）。
- Technical support providers, for our legitimate interest (e.g. assisting with our websites).
- 技术支持提供商，基于我们的合法目的（例如协助维护我们的网站）。
- Providers assisting us with receipt of payments via our websites – to perform our contract with you or to take steps to enter into a contract with you.

- 协助我们通过网站接收付款的提供商——为履行我们与您的合同或为采取措施订立合同。
- Recruitment agencies assisting us with filling our vacancies – for our legitimate interest to fill-in our vacancies.
- 协助我们招聘职位空缺的招聘机构——基于我们填补职位空缺的合法目的。
- Professional advisers such as lawyers, accountants, insurance companies and business analysts – for our legitimate interests to ensure compliance, manage risk, and optimize business operations.
- 专业顾问，如律师、会计师、保险公司及业务分析师——基于我们的合法目的，确保合规、管理风险并优化业务运营。
- Third Party software hosting companies which provide us with software solutions – for our legitimate interests to ensure efficient and secure software operations and support.
- 为我们提供软件解决方案的第三方软件托管公司——基于我们的合法目的，确保软件运行的高效性与安全性并提供支持。
- Cloud service providers which host the Personal Data we collect from you – for our legitimate interests to ensure secure, scalable, and reliable data storage and management.
- 为确保数据存储和管理的安全性、可扩展性及可靠性，我们所收集个人数据的云服务提供商——基于我们的合法目的。
- Regulatory or legal authorities when required by law (e.g., tax reporting, court orders) – to comply with a regulatory obligation.
- 依法要求时，向监管或法律机关（例如税务申报、法院命令）提供个人数据——以履行监管义务。

## Where we store your Personal Data

### 存储您个人数据的地点

Electronic versions of your Personal Data are stored on our own servers or on the ones of cloud service providers in Asia-Pacific, the European Union or the United Kingdom.

您的电子版个人数据存储于我们自有服务器或位于亚太地区、欧盟或英国的云服务提供商服务器上。

Where there is a cross-border transfer of your Personal Data, we will take steps to ensure your Personal Data is adequately protected. In such cases and in accordance with the regulations in force, we require our IT Third Parties to provide the necessary

safeguards to ensure regulated, secure transfers (e.g. by requiring them to sign the European Commission's standard contractual clauses).

如涉及跨境传输您的个人数据，我们将采取措施确保您的个人数据得到充分保护。在此情况下，依据现行法规，我们要求信息技术第三方提供必要保障，以确保受规管的安全传输（例如要求其签署欧盟委员会标准合同条款）。

## How we protect your Personal Data

### 我们如何保护您的个人数据

Lenton Group undertakes to adopt all measures necessary to protect the security and confidentiality of your Personal Data and, in particular, to prevent any damage, erasure or unauthorised access by a Third Party. Lenton Group implements the following measures to protect your Personal Data:

Lenton 集团承诺采取一切必要措施，保护您的个人数据安全与机密性，特别防止第三方造成的损害、删除或未经授权访问。Lenton 集团实施以下措施以保护您的个人数据：

#### Access Controls 访问控制

##### Principle of Least Privilege 最小权限原则

Lenton Group adheres to the principle of least privilege, ensuring that employees, contractors, and systems are granted the minimum level of access necessary to perform their job functions. This approach minimizes the risk of unauthorized data access.

Lenton 集团遵循最小权限原则，确保员工、承包商及系统仅被授予履行工作职责所必需的最低访问权限。此举最大限度地降低了未经授权访问数据的风险。

##### Authentication 身份验证

All individuals accessing Personal Data must be authenticated using approved authentication methods, such as usernames, passwords, and multi-factor authentication.

所有访问个人数据的人员，均须通过批准的认证方式进行身份验证，例如用户名、密码及多因素认证。

## Access granting 访问授权

Access granting is determined by the individual's role and responsibilities within the organization. Access control lists and role-based access control mechanisms are used to enforce authorization policies.

访问授权根据个人在组织中的角色与职责予以确定。采用访问控制列表及基于角色的访问控制机制，以执行授权政策。

## Monitoring and Logging 监控与日志记录

All access to your Personal Data is monitored and logged. Logs are regularly reviewed and audited to detect and investigate any unauthorized access or suspicious activities.

所有对您个人数据的访问均受到监控并记录日志。日志会定期审核与检查，以发现并调查任何未经授权的访问或可疑活动。

## IT Security Measures 信息技术安全措施

To protect your Personal Data, Lenton Group employs several IT security measures. We conduct regular security assessments and vulnerability testing to identify and mitigate potential risks. We also implement intrusion detection systems to monitor and respond to any unauthorized access or suspicious activities.

为保护您的个人数据，Lenton 集团采取多项信息技术安全措施。我们定期进行安全评估和漏洞检测，以识别并减轻潜在风险。同时，我们部署入侵检测系统，监控并响应任何未经授权访问或可疑活动。

## Organizational Measures 组织性管理措施

Lenton Group is committed to ensuring that all employees are aware of their data protection responsibilities. We provide regular training and awareness programs to educate employees on data protection policies, procedures and best practices.

Lenton 集团致力于确保所有员工明确其数据保护职责。我们定期开展培训和宣传活动，教育员工了解数据保护的策略、程序及最佳实践。

Regular audits and reviews of data protection policies and procedures are conducted to ensure that your Personal Data is processed in accordance with the applicable laws, regulations and with the principles outlined in this Notice.

定期对数据保护政策和程序进行审计与审核，确保您的个人数据依照适用法律法规及本声明所载原则进行处理。

## Data Risk Assessment 数据风险评估

Before introducing new data processing methods, a comprehensive data risk assessment is performed. This assessment evaluates the compliance of the new IT system with applicable laws and regulations, as well as with the principles outlined in this Notice, to ensure that your Personal Data is processed securely.

在引入新的数据处理方式前，将进行全面的数据风险评估。该评估旨在确认新 IT 系统符合适用法律法规及本声明所述原则，确保您的个人数据安全处理。

## Data Breach Response 数据泄露响应

If your Personal Data is affected by a security breach (destruction, loss, alteration or disclosure), Lenton Group undertakes to fulfil our obligation to notify Personal Data breaches to the relevant data protection authorities.

如果您的个人数据遭遇安全泄露（包括破坏、丢失、篡改或泄露），Lenton 集团将履行依法向相关数据保护主管机关通报个人数据泄露事件的义务。

## Your rights concerning your Personal Data

### 您关于个人数据的权利

Subject to applicable laws, and unless the processing is necessary for compliance with a legal obligation, the performance of a contract to which you are a party, or for legitimate interests pursued by Lenton Group, you have the following rights regarding your Personal Data:

在适用法律范围内，除非处理是为履行法律义务、执行您所参与的合同，或为 Lenton 集团追求合法利益所必需，您享有以下关于个人数据的权利：

- **right of access:** you may obtain a copy of your Personal Data being processed by Lenton Group;
- **访问权：**您有权获取 Lenton 集团正在处理的您的个人数据副本；
- **right to rectification:** you may update your Personal Data or ask us to rectify your Personal Data processed by Lenton Group;
- **更正权：**您有权更新您的个人数据，或要求我们更正 Lenton 集团处理的您的个人数据；
- **right to object,** in particular to prevent direct marketing: you may notify your preference not to receive direct marketing from Lenton Group or ask Lenton Group to stop processing your Personal Data;

- **反对权**，尤其是防止直接营销：您可以通知您的偏好，不愿接收 Lenton 集团的直接营销，或要求 Lenton 集团停止处理您的个人数据；
- **right to erasure**: you may ask Lenton Group to delete your Personal Data;
- **删除权**：您可以要求 Lenton 集团删除您的个人数据；
- **right to restrict processing**: you may ask Lenton Group to suspend the processing of your Personal Data;
- **限制处理权**：您可以要求 Lenton 集团暂停处理您的个人数据；
- **right to data portability**: you may ask Lenton Group to retrieve your Personal Data for reuse.
- **数据可携权**：您可以要求 Lenton 集团检索您的个人数据，以便再利用。
- **right to withdraw consent**: In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Where we are providing you with marketing information, you can also change your marketing preferences by using the unsubscribe button at the bottom of our marketing e-mails sent to you. Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.
- **撤回同意权**：在您针对特定目的已提供同意收集、处理及转移您的个人数据的有限情况下，您有权随时撤回该特定处理的同意。若我们向您提供营销信息，您也可通过我们发送的营销电子邮件底部的退订按钮更改您的营销偏好。收到您撤回同意的通知后，我们将不再为您最初同意的目的处理您的个人数据，除非我们另有合法依据。

## How to exercise your rights? 如何行使您的权利？

You may exercise these rights by contacting at [dpo@lentongrp.com](mailto:dpo@lentongrp.com).

您可以通过联系 [dpo@lentongrp.com](mailto:dpo@lentongrp.com) 来行使这些权利。

All requests must be submitted with a proof of your identity, along with the subject and scope of the request, to help us identify the data in question.

所有请求必须附带您的身份验证凭证及请求的主题和范围，以协助我们识别相关数据。

Lenton Group undertakes to respond to your requests within one month. Occasionally, if your request is particularly complex, it may take longer than a month. In such cases, we will notify you and keep you updated on the progress.

Lenton 集团承诺在一个月内回复您的请求。如您的请求特别复杂，处理时间可能超过一个月。在此情况下，我们将通知您并持续更新处理进展。

## No fee usually required 通常不收取费用

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

您访问个人数据（或行使其他任何权利）通常无需支付任何费用。但若您的访问请求明显无理或过于频繁，我们可能会收取合理费用。或者，在此类情形下，我们可能拒绝履行该请求。

## What happens if you fail to provide Personal Data? 如果您未提供个人数据，将会发生什么？

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with our products or services), or we may be prevented from complying with our legal obligations (such as complying with sanctions and embargos regulations).

若您未能在要求时提供必要信息，我们可能无法履行与您的合同（如向您提供产品或服务），或无法遵守法律义务（如遵守制裁和禁运规定）。

## Privacy Notice Review and Updates

### 隐私声明的审查与更新

We may change, modify, add or remove portions of this Notice at any time, and any changes will become effective immediately. Any changes we make to our Privacy Notice will be posted on this page and, where appropriate, notified to you.

我们可能随时更改、修改、增补或删除本声明的部分内容，且任何更改将立即生效。我们对隐私声明所作的任何更改将发布于本页面，并在适当情况下通知您。



## Contact Information

### 联系我们

For any questions or concerns regarding this Notice, please contact the Data Protection Officer of Lenton Group at [dpo@lentongrp.com](mailto:dpo@lentongrp.com).

如对本声明有任何疑问或关注，请联系 Lenton 集团数据保护官，邮箱地址为 [dpo@lentongrp.com](mailto:dpo@lentongrp.com)。