

China-specific privacy information

This China-specific privacy information shall apply in addition to our privacy policy (which is available via our website, aoshearman.com/legal-notices/privacy-policy, or by clicking [here](#)) when A&O Shearman process personal information within the scope of China’s Personal Information Protection Law (“PIPL”).

1. For the sections “What personal information do we collect about you?” and “How, and on what basis, we use your personal information”, the chart below supplements those two sections. The “Personal Information Involved” column describes what personal information we collect from you, and the “Scenario of Collection” and “Purpose of Processing” columns describe how and for what purpose we use your personal information.

PERSONAL INFORMATION INVOLVED	SCENARIO OF COLLECTION	PURPOSE OF PROCESSING
<ul style="list-style-type: none"> Basic information which may include: your name (including name prefix or title), the company you work for, your title or position Contact information which may include: your email address, phone number, work address, postal address Technical information from your visits to our website or applications or in relation to materials and communications we send to you electronically which may include: IP address, user cookie preferences, user language preference session, user site preferences Any other information relating to you which you may provide to us when you use facilities on the website, such as our email queries facilities 	Use of the A&O Shearman website	<ul style="list-style-type: none"> To provide and improve our website and its facilities, including auditing and monitoring its use To provide and improve our services to you and to our clients To provide information requested by you To promote our services, including sending legal updates, publications and details of events To manage and administer our relationship with you and our clients For professional networking purposes
<ul style="list-style-type: none"> Basic information which may include: your name (including name prefix or title), the company you work for, your title, position, job level or job function, demographic information, such as industry, country, and postcode Contact information which may include: your email address, phone number, work address, postal address Professional information, including your photograph, from LinkedIn or the website of the organization you work for Technical information from your visits to our website or applications or in relation to materials and communications we send to you electronically which may include: whether you click on the links in our emails and, if you follow a link to one 	Marketing and other emails	<ul style="list-style-type: none"> To provide and improve our website To provide and improve our services to you and to our clients, and to monitor internal compliance with our policies and standards To provide information requested by you To promote our services, including sending legal updates, publications and details of events To ensure that we provide content that is of interest to you, we use technology in our marketing emails and on our websites that logs whether you click on the links in our emails and, if you follow a link to one of our websites, the time and date you access our website and how long you

PERSONAL INFORMATION INVOLVED**SCENARIO OF COLLECTION****PURPOSE OF PROCESSING**

<p>of our websites, the time and date you access our website and how long you spend on the website</p> <ul style="list-style-type: none">♦ Any other information relating to you which you may provide to us which may include: your marketing preferences, your interests, your responses to our marketing and other emails, and information on past participation in marketing initiatives		<p>spend on the website. We may use this information to determine what future marketing is likely to be of interest to you. If you would prefer that we don't record this information, please don't click on the links. We may use your response to our marketing emails to determine what future marketing is likely to be of interest to you and what future marketing we send you. For example, if you accept an invitation to a seminar, we will record this and may send you marketing emails relevant to that seminar and the topics it covers in the future</p> <ul style="list-style-type: none">♦ To manage and administer client relationships, including but not limited to, using a relationship management tool, where permitted by applicable local law, to assess the strength of the relationship between individuals in A&O Shearman and our clients or potential clients based on the frequency of email contact with us. We then use that information in order to assess, analyze and improve the services that we provide♦ For professional networking purposes
<ul style="list-style-type: none">♦ Basic information which may include: your name (including name prefix or title), the company you work for, your title or position and your relationship to a person♦ Contact information which may include: your email address, phone number, work address, postal address♦ Professional information, including your photograph, from LinkedIn or the website of the organization you work for♦ Personal information you provide to us for the purposes of attending meetings and events which may include: personal information about you in relation to your attendance at our offices or at an event or seminar organized by A&O Shearman or its business partners (for example, registration status and other event-related data), sensitive personal information about your dietary or access requirements (for example, food allergies)♦ Any other information relating to you which you may provide to us as described in any additional privacy notice relevant to the meeting, seminar	<p>Meetings, events and seminars</p>	<ul style="list-style-type: none">♦ To provide and improve our services to you and to our clients, and to monitor compliance with our policies and standards♦ To manage access to our premises and for security purposes♦ To provide information requested by you♦ To promote our services♦ To manage and administer our relationship with you and our clients♦ For professional networking purposes♦ We will only process and use sensitive personal information about your dietary or access requirements in order to cater for your needs and to meet any other legal or regulatory obligations we may have♦ We may share your information with IT and other service providers or business partners involved in organizing or hosting the relevant event

PERSONAL INFORMATION INVOLVED	SCENARIO OF COLLECTION	PURPOSE OF PROCESSING
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and event, which may include information facilitating contact tracing in relation to COVID-19

<ul style="list-style-type: none"> ◆ Basic information which may include: your name (including name prefix or title), the company you work for, your title, position, job level or job function, demographic information, such as industry, country and postcode, and your relationship to a person ◆ Contact information which may include: your email address, phone number, work address, postal address ◆ Professional information, including your photograph, from LinkedIn or the website of the organization you work for ◆ Financial information which may include payment-related information ◆ Identification and background information provided by you or collected as part of our business acceptance processes ◆ Personal information provided to us by or on behalf of our clients or generated by us in the course of providing services to them, which may include sensitive personal information, and which otherwise depends on the nature of the matter and the information that is provided to, or obtained by, us in the course of that matter 	<p>Legal and other services</p>	<ul style="list-style-type: none"> ◆ To provide and improve our services to you and to our clients, including handling the personal information of others on behalf of our clients, and to monitor compliance with our policies and standards ◆ To manage access to our premises and for security purposes ◆ To provide information requested by you ◆ To promote our services ◆ To manage and administer our relationship with you and our clients ◆ To fulfill our legal, regulatory and risk management obligations, including as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, reputational and financial checks ◆ For professional networking purposes
<ul style="list-style-type: none"> ◆ Basic information which may include: your name (including name prefix or title), the company you work for, your title, position, job level or job function, demographic information, such as industry, country, and postcode, and your relationship to a person ◆ Contact information which may include: your email address, phone number, work address, postal address ◆ Any other information relating to you which you may provide to us, including education/qualifications/certifications, any other personal information and sensitive personal information that you voluntarily provide to us with your application when you use the vacancy application facility in the 'Careers' section of our website or in other relevant facilities 	<p>Recruitment facilities on our website</p>	<ul style="list-style-type: none"> ◆ For the purposes of recruitment

2. For the section “How, and on what basis, we use your personal information”, the supplementary content below shall also apply.

We will only process personal information for the purposes described above, with at least one lawful basis to do so under PIPL as described below. In some cases, where required, we will also seek a separate consent to process the personal information.

The legal bases under PIPL on which we use your personal information are as follows:

- (a) Where prior consent is obtained from you;
 - (b) Where it is necessary for the conclusion or performance of a contract to which you are 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;
 - (c) Where it is necessary for performing a statutory responsibility or statutory obligation;
 - (d) 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;
 - (e) Where 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;
 - (f) 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 PIPL; and
 - (g) Any other circumstance as provided by law or administrative regulations.
3. For the section “Who we share your personal information with”, the supplementary content below shall also apply.

Personal information may also be shared with foreign judicial or law enforcement bodies in compliance with applicable local laws and regulations.

4. For the section “Which countries we transfer your personal information to”, the supplementary content below shall also apply.

Subject to relevant laws and regulations in China, our offices located globally and third-party providers may obtain information for the purposes set out in this privacy policy. This may entail a transfer of your information from a location within the PRC to outside the PRC. We endeavor to take reasonable measures to ensure that your personal information is protected in accordance with applicable local laws and regulations, and to implement relevant compliance requirements as required by applicable local laws and regulations.