

PRIVACY NOTICE

隐私声明

YETI Outdoor Products (Shanghai) Company Limited

野酲户外用品（上海）有限公司

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PURPOSE OF THIS NOTICE

目的

This Privacy Notice describes how YETI Outdoor Products (Shanghai) Company Limited and its parent, subsidiary and affiliate companies (collectively, “YETI”, “we”, or “us”) collect, use, share, and retain Personal Information about you in accordance with our legal obligations under data protection and privacy laws, including the People’s Republic of China Personal Information Protection Law (“PIPL”).

本隐私通知阐述了野酲户外用品（上海）有限公司及其母公司、子公司和关联公司（统称“野酲”、“我们”）是如何根据我们在数据保护和隐私法，包括《中华人民共和国个人信息保护法》（“《个人信息保护法》”）下的法律义务，来收集、使用、共享和保存您的个人信息的。

This Notice may change from time to time, and we will notify you in advance of any material changes.

本声明可能不定时作出修改，如有任何重大修改，我们将提前通知您。

POLICY APPLIES TO / APPLICABILITY

适用对象

This Notice applies to the Personal Information about our workforce, applicants, vendors, and suppliers, as well as other Personal Information YETI collects and uses.

本声明适用于我们的员工、职位申请人、服务提供方和供货商的个人信息，以及野酲收集和其他个人信息。

PERSONAL INFORMATION PROCESSORS & PERSONAL INFORMATION PROTECTION OFFICERS

个人信息处理方和个人信息保护官

YETI is the Personal Information Processor of the Personal Information you provide to us. At this time, YETI is not required to appoint a Personal Information Protection Officer. YETI will update this Privacy Notice if it does.

您所提供的个人信息均由野酲处理。目前，野酲尚无个人信息保护官。如后续存在个人信息保护官，我们将相应更新此隐私通知。

TYPES OF PERSONAL INFORMATION WE PROCESS

我们处理的个人信息类型

We collect different types of information about you, including Personal Information. **Personal Information** refers to all kinds of information, recorded by electronic or other means, related to identified or identifiable natural persons, excluding information after anonymization. **Processing** of Personal Information includes the collection, storage, use, processing, transmission, provision, disclosure, and deletion of Personal Information.

我们收集与您有关的各类信息，其中包括个人信息。**个人信息**，是指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。个人信息的**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。

The types of Personal Information YETI collects about you depends on your role with YETI. It may include: 您与野醜的关系决定了野醜收集的个人信息类型，个人信息类型可包括以下类型：

Personal Information Category 个人信息类型	Examples 示例
Identification and contact information, and related identifiers 身份信息和联系信息以及相关标识符	Name, postal address, phone number, email address, username, ethnicity, and gender 姓名、邮政地址、电话号码、电子邮件地址、用户名、民族和性别
Recruitment, employment, or engagement information 招聘、就业或聘用信息	Application forms and information included in a resume or cover letter, letter of intent for employment 简历或求职信、聘用意向书中包含的申请表和信息
Personal characteristics and demographic data 个人特征和人口统计信息	Age, date of birth, race, color, sexual orientation, gender/gender identity/gender expression, ethnicity, and similar data 年龄、出生日期、种族、肤色、性取向、性别/性别认同/性别表现、民族和类似信息
Government-issued identification numbers 政府签发的身份证号码	National identification number, and social security number 国家身份证号码和社会保障号码
Health information (in rare circumstances) 健康信息（仅在极少数情况下）	Health status, and similar data 健康状况和类似信息
Financial information 财务信息	Credit history or credit checks, financial institution account information, payroll, pension or retirement contribution information, stock compensation information, and tax information 信用记录或信用审查、金融机构账户信息、工资单、养老金或退休供款信息、股票酬劳和税务信息
Criminal background information 犯罪背景信息	Felony convictions, misdemeanour convictions, infractions or violations, pending criminal cases, history of incarceration 轻、重罪定罪记录、违法违规记录、未决刑事案件、监禁史
Business travel and expense information 差旅和花销信息	Travel itinerary information and corporate expenses 差旅行程信息和公司费用
Education information 教育信息	Degrees or schooling, licenses, and professional memberships 学位或学历、执照和专业会员资格
Device/online information 设备/在线信息	Information about use of the YETI network and communication systems, including user IDs, passwords, IP addresses, web logs, device IDs, and audit trails of system access, and information collected through our Mobile Device Management (“MDM”) software about the personal mobile device that you use to access YETI applications, such as the names of applications you have downloaded and the location of your device if it is

Personal Information Category 个人信息类型	Examples 示例
	lost or stolen 野醜网络和通信系统的使用信息，包括用户 ID、密码、IP 地址、网络日志、设备 ID 和系统访问的审核跟踪，以及通过移动设备管理（“MDM”）软件收集的您用于访问野醜应用程序的个人移动设备的相关信息（例如，您下载的应用程序的名称以及设备丢失或被盗时的位置）
Employment and business contact information 就业和业务联系信息	Business addresses, business phone numbers, business email addresses, and other similar information 营业地址、业务联系电话、业务电子邮件地址和其他类似信息
Professional or employment-related information 职业或就业相关信息	Business titles, employee code, work history, hire date, supervisor, employment location and performance information 职衔、员工代码、工作经历、聘用日期、主管、雇用地点和表现信息
Audio or visual information 视听资料	CCTV footage, photographs taken at Company functions or utilized for company identification purposes, voice recordings, and conference call recordings 闭路电视录像、在公司活动中拍摄或用于公司身份识别的照片、录音和电话会议录音

If you disclose any Personal Information relating to other people to us or to our service providers in connection with potential employment, employment, or business relationship, you represent that you have the authority to do so and that you gave them sufficient information about this disclosure and YETI's subsequent processing of the information. If this is not the case, please ask for their authority to do so and make this Notice available to them.

如您向我们或我们的服务提供商披露的个人信息涉及他人的潜在就业、就业或商业关系，您表示您有权限向我们披露该信息，且您已充分知会该信息的当事人，您将向野醜披露其信息和野醜后续将对该信息进行处理。否则请先获得信息当事人的授权，并将本声明的内容转告信息当事人。

SENSITIVE PERSONAL INFORMATION

敏感个人信息

Sensitive Personal Information refers to the Personal Information that, once leaked or illegally used, may lead to the infringement of the personal dignity of natural persons or the harm of personal or property security, including such information as biometrics, religious beliefs specific identities, medical health, financial accounts, individual location tracking, and the personal information of minors under the age of 14.

敏感个人信息 是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、金融帐户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。

YETI processes the following types of Sensitive Personal Information about you, and takes strict protective measures on such processing:

在处理您的以下敏感个人信息时，野醜将采取严格的保护措施：

- Financial account information for the purpose of executing payroll and compensation services in the context of an employment relationship, and

对于员工，与工资和薪酬服务相关的财务账户信息，以及

- **Health information as needed for the purpose of performing business operations.**
业务营运所需的健康信息。

Separate and explicit consent to the processing of such Sensitive Personal Information will be gathered. 在单独征得您的明确同意信息处理后，我们才会收集此类敏感个人信息。

HOW WE COLLECT YOUR PERSONAL INFORMATION

我们如何收集您的个人信息

We collect Personal Information about you directly from you, devices that you use in connection with your employment, or, in some circumstances, from third parties.

我们会直接从您本人、您的工作设备或（在某些情况下）从第三方处收集您的个人信息。

PURPOSE OF PROCESSING PERSONAL INFORMATION AND PROCESSING METHOD

处理个人信息的目的和方法

YETI uses your Personal Information for its business purposes and where necessary, its vendors' business purposes. These purposes include:

您的个人信息会被用于野醒或我们供货商（必要时）的商业目的，包括：

- **Talent management and administration**, including training, employee perks or company gifts, compensation, and benefits.
人才管理, 包括培训、员工津贴或公司礼品、薪酬和福利。
- **Performance of business operations**, including executing your job function; providing and monitoring IT systems; maintaining accounts and internal directories; protecting occupational health and safety; and similar purposes.
业务营运, 包括履行岗位职责; 提供及监察信息技术系统; 维护帐户和内部目录; 保护职业健康和安
全; 以及其他类似目的。
- **Performance of supplier relationships**, including execution of purchase orders.
履行供应商关系, 包括执行采购订单。
- **Recruitment**, including job advertising, interviewing, and selecting and hiring new staff.
招聘, 包括发布招聘广告、面试、选拔和雇用新员工。
- **Security operations**, including detecting security incidents, debugging and repairing errors, preventing unauthorized access to the Company's computer and electronic communications systems.
安全操作, 包括检测安全事件、调试和修复故障、防止未经授权访问公司的计算机和电子通信系
统。
- **Legal compliance.**
- **遵守法律。**

Your Personal Information is processed both manually and electronically.

我们将以手动和电子方式处理您的个人信息。

DISCLOSURES

披露

We may share Personal Information about you in the following circumstances:

以下情况下，我们可披露您的个人信息：

- **Internally with the YETI Coolers, LLC and affiliates:** In order to assist us with establishing, managing, or terminating our employment or supplier relationship with you, we may share your information with YETI employees, contractors, consultants, and other parties, including members of YETI.

共享给 YETI Coolers, LLC 和内部关联方：我们可能会与野醜的员工、承包商、顾问和其他方（包括野醜的成员）共享您的信息，以帮助我们建立、管理或终止与您的聘用或供应关系。

- **Service Providers:** Vendors that provide employment services to us or on our behalf, such as information technology, background check services, data processing services, Talent, payroll and benefits services, co-employers, and employers of record so that we may operate our business.
服务提供方：指为我们或代表我们提供聘用服务（如信息技术、背景调查服务、数据处理服务、人才、工资和福利服务、共同雇主和名义雇主），以便我们业务营运的供应商。
- **Business Transaction Purposes:** In connection with the sale, purchase, or merger of our business.
业务交易目的：与本公司业务的出售、收购或合并相关。
- **Litigation Purposes:** To seek legal advice from YETI's in-house or outside counsel or in connection with litigation with a third party.
诉讼目的：向野醜的内外部律师寻求法律意见，或就与第三方的诉讼寻求法律意见。
- **Legal Compliance:** When required to do so by law or to comply with valid legal process such as search warrants, subpoenas or court orders.
法律合规：满足法律要求或遵守有效法律程序，如搜查令、传票或法庭命令。
- **For Business Operations:** To provide another party with a means of contacting the workforce in the normal course of business.
业务运营：在正常业务营运的过程中，将员工的联系方式提供给另一方。
- **Protection of YETI:** To protect our rights and property or protect the safety of a person or group.
保护野醜：保护我们的权利和财产，或维护个人或集体的安全。
- **Publicly available:** If your information is publicly available, we may share it with others, such as information about you that is on our public website.
公开信息：我们可与其他人共享您的公开信息，例如我们公开网站上与您相关的信息。
- **Consent:** With your explicit and informed consent.
同意：您已知情并明确同意。

BASIS FOR PROCESSING

信息处理的依据

YETI has a lawful basis for processing your Personal Information. In addition to obtaining your personal consent that is voluntarily and clearly given with full knowledge, we may process your Personal Information where it is necessary for the conclusion or performance of a contract to which you are a party, or to implement human resources management in accordance with labor rules and regulations according to law and collective contracts concluded according to law, as well as other circumstances provided by laws and administrative regulations.

野醜具有法律依据处理您的个人信息。除了征得您本人在完全知情的情况下自愿给予的明确同意外，我们还可以根据劳动规章制度、相关法律、和依法订立的集体合同以及法律、行政法规规定的其他情形，出于订立或履行您作为合同一方的合同的目的，或出于实施人力资源管理的目的，在必要时，处理您的个人信息。

Explicit and separate consent will be requested for the processing of your Sensitive Personal Information and for transfers to entities outside of the territory of the People's Republic of China.

在处理您的敏感个人信息以及将您的敏感个人信息转移到中华人民共和国境外的实体时，我们将单独征求您的明确同意。

YOUR RIGHTS AND HOW TO EXERCISE THEM

您享有的权利以及如何行使该等权利

In accordance with the PIPL, you have the following rights, in some cases subject to specific conditions as set forth in the PIPL:

根据《个人信息保护法》，在特定情况下，您享有以下权利，但必须遵守《个人信息保护法》中规定的特定条件：

- **Know and Make Decisions About.** You have the right to know and make decisions about the processing of your Personal Information.
知情和决定。您有权知道我们对您个人信息的处理，并决定是否允许我们处理您的个人信息。
- **Restrict or Refuse.** Unless otherwise provided by laws and administrative regulations, you have the right to restrict or refuse the processing of your Personal Information.
限制或拒绝。您有权限制或拒绝对您个人信息的处理，法律、行政法规另有规定的除外。
- **View and Copy.** You have the right to view and copy the Personal Information we process about you. If requested, we shall provide the information in a timely manner.
查看和复制。您有权查看和复制我们处理的您的个人信息。如您提出此类要求，我们将及时提供所需信息。
- **Portability.** You have the right to transfer your Personal Information to a designated Personal Information Processor of your choice.
可携权。您有权将您的个人信息转移到自己指定的个人信息处理方。
- **Correct or Rectify.** If you discover that your Personal Information is inaccurate or incomplete, you have the right to request us to correct or supplement it.
纠正或修改。如发现您的个人信息不准确或不完整，您有权要求我们更正或补充。
- **Delete.** You have the right to request us to delete the Personal Information we collected from you and retained in the following circumstances. Please note that if the retention period has not expired, or the deletion of Personal Information is technically difficult to achieve, YETI will stop processing other than storing, and will take all necessary security protection measures.
删除。在下列情况下，您有权要求我们删除我们收集并保留的您的个人信息。请注意，如果保留期限尚未到期，或者在技术上难以删除相关个人信息，野醍将停止处理但仍然保留该信息，并采取一切必要的安全保护措施。
 - The processing purpose has been achieved, cannot be achieved, or is no longer necessary to achieve the processing purpose.
处理目的已实现、无法实现或不再需要实现。
 - YETI ceases to provide products or Services, or the retention period has expired.
野醍不再为您提供产品或服务，或信息的保存期已过。
 - You withdraw your consent.
您撤回了同意。
 - We violate the laws, administrative regulations, or the agreement to handle Personal Information.
我们违反了法律、行政法规或个人信息处理的相关约定。
 - Any other circumstances stipulated by applicable laws and administrative regulations.
适用法律、行政法规规定的其他情形。
- **Explain Our Processing Rules.** You have the right to request us to explain our Personal Information processing rules
解释处理规则。您有权要求我们解释我们的个人信息处理规则。
- **Withdraw Consent.** Where Personal Information processing is based upon your consent, you have the right to withdraw your consent at any time. Please note that withdrawal of your consent does not affect the effectiveness of the Personal Information processing activities that had been carried out based upon your consent before the withdrawal.
撤回同意。在经您同意对个人信息进行处理的情况下，您有权在任何时候撤回您对个人信息处理的同意。请注意，撤回同意并不影响撤回前我们经您同意而进行的个人信息处理活动的有效性。
- **Lodge a Complaint.** You have the right to complain or report illegal Personal Information processing activities to the departments performing duties of personal information protection. The departments receiving such complaints or reports shall promptly process them according to the law and notify the complainants or reporters of the results. The departments performing duties of personal information protection shall make public the contact information for accepting complaints or reports.

提出申诉。您有权向个人信息保护部门投诉或举报非法个人信息处理活动。受理投诉、举报的部门应当及时依法处理，并将处理结果通知投诉人、举报人。个人信息保护部门应当公开受理投诉、举报的联系方式。

To exercise any of these rights, please send an email or place a call to the contact information provided below under “**CONTACT INFORMATION**” and we will respond to your request in a timely manner. 如需行使上述任何权利，请发送电子邮件或致电“**联系信息**”下提供的联系信息，我们会及时回复您的请求。

CROSS BORDER TRANSFERS
跨境转移个人信息

While we try to maintain your Personal Data within the territory of the People’s Republic of China, where necessary, we may make transfers outside of the territory, including to or from the United States. When we transfer your Personal Information outside of the territory, we provide the appropriate safeguards to protect your Personal Information and make such transfers in compliance with applicable law. In the event of such a transfer, we will provide you with the name of the overseas recipient, contact information, purpose and method of processing, and type of Personal Information. The following is the list of systems that process your Personal Information outside of the territory of the People’s Republic of China.

尽管我们尽量将您的个人信息保存在中华人民共和国境内，但必要时，我们可能会将您的个人资料转移到境外，包括转入美国或从美国转出。在将您的个人信息转移到境外的过程中，我们将采取妥当的保护措施保护您的个人信息，并确保该信息转移符合适用法律。进行此类转移时，我们将向您提供海外接收人的姓名/名称、联系方式、处理目的和方法以及个人信息的类型。下表为我们在中华人民共和国境外处理您的个人信息时所使用的系统。

Information Processing System 信息处理系统	Purpose of Processing 处理目的	Method of Processing 处理方式	Type of Personal Information 个人信息类型
CultureAMP	Performance of business operations 业务营运	Hybrid (manual and electronic) 混合（人工和电子方式）	Identification and contact information; Professional or employment-related information; Personal characteristics and demographic data 身份和联系方式；职业或就业相关信息；个人特征和人口统计数据
Eightfold	Recruitment 招聘	Hybrid (manual and electronic) 混合（人工和电子方式）	Recruitment, employment, or engagement information 招聘、就业或聘用信息

Information Processing System 信息处理系统	Purpose of Processing 处理目的	Method of Processing 处理方式	Type of Personal Information 个人信息类型
Google Cloud Platform 谷歌云平台	Performance of business operations 业务营运	Hybrid (manual and electronic) 混合（手动和电子方式）	Identification and contact information; Recruitment; Professional or employment-related information; Personal characteristics and demographic data 身份和联系信息；招聘信息；职业或就业相关信息；个人特征和人口统计信息
Greenhouse	Recruitment 招聘	Hybrid (manual and electronic) 混合（手动和电子方式）	Recruitment, employment, or engagement information 招聘、就业或聘用信息
Microsoft 微软	Recruitment; Performance of business operations 招聘；业务营运	Hybrid (manual and electronic) 混合（手动和电子方式）	Identification and contact information; Recruitment, employment or engagement information; Personal characteristics and demographic data; Government-issued identification numbers; You and your beneficiaries' health information; Financial information; Education information; Professional or employment-related information 身份和联系信息；招聘信息；就业或聘用信息；个人特征和人口统计信息；政府签发的身份证号码；您和您的受益人的健康信息；财务信息；教育信息；职业或就业相关信息
Okta	Performance of business operations 业务营运	Hybrid (manual and electronic) 混合（手动和电子方式）	Identification and contact information 身份和联系信息

Information Processing System 信息处理系统	Purpose of Processing 处理目的	Method of Processing 处理方式	Type of Personal Information 个人信息类型
Paycom	Talent management and administration 人才管理	Hybrid (manual and electronic) 混合（手动和电子方式）	Identification and contact information; Recruitment; Professional or employment-related information; Personal characteristics and demographic data 身份和联系信息；招聘信息；职业或就业相关信息；个人特征和人口统计信息
SAP 安全网络通信 (SNC)	Performance of supplier relationship 供应商关系	Hybrid (manual and electronic) 混合（手动和电子方式）	Business contact information 业务联系信息
Slack	Performance of business operations 业务营运	Hybrid (manual and electronic) 混合（手动和电子方式）	Identification and contract information 身份和合同信息
Smartsheet	Performance of business operations 业务营运	Hybrid (manual and electronic) 混合（手动和电子方式）	Employment and business contact information 聘用和业务联系信息
Tableau	Performance of business operations 业务营运	Hybrid (manual and electronic) 混合（手动和电子方式）	Identification and contact information; Recruitment, employment, or engagement information; Education information; Professional or employment-related information 身份和联系信息；招聘、就业或聘用信息；教育信息；职业或就业相关信息
Zoom	Performance of business operations 业务营运	Hybrid (manual and electronic) 混合（手动和电子方式）	Audio or visual information 视听资料

For any questions or additional information requests related to these transfers, or to exercise any of your rights related to Personal Information that has been transferred out of the territory, please contact us using the “**CONTACT INFORMATION**” listed below.

对于与此类转移相关的任何问题或额外信息请求，或您想行使与已转移到境外的个人信息相关的任何权利，请通过下方“**联系信息**”与我们联系。

AUTOMATIC DECISION-MAKING

自动决策

We generally do not use your Personal Information with any automated decision-making processes. However, if that changes, we will be transparent about the process and if the automatic decision-making has a significant impact on your rights and interests, you will have the right to require us to give an

explanation of the automatic decision-making and to reject the decision. If and when these rights become available, please use the “**CONTACT INFORMATION**” below.

一般情况下，我们一般不会将您的个人信息用于任何自动决策。如果我们将您的个人信息用自动决策处理，我们将对整个过程保持透明公开；如果该自动决策对您的权益有重大影响，您有权要求我们对自动决策作出解释并拒绝该决策。如您需要使用该等适用权利，请通过以下“**联系信息**”联系我们。

RETENTION

数据的保存

We retain Personal Information for only so long as necessary for achieving the purpose of processing as explained in this Notice and consistent with applicable law, except for where the retention of Personal Information is otherwise provided for in law and administrative regulations. In addition, to provide security and business continuity for the activities described in this Notice, we may make backups of certain data, which we may retain for longer than the original data.

除法律、行政法规另有规定外，我们依法对个人信息的保存期限为实现本声明所述处理目的所必要的最短时间。此外，考虑到本声明所述活动的安全性和业务连续性，我们可能会备份某些数据，该等数据的保存时间可能比原始数据的保留时间更长。

SECURITY

安全

We take technical, administrative, physical, and procedural security measures to reduce the risk that Personal Information in our possession and control will undergo accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access.

我们采取技术、行政、物理和程序安全措施，以降低我们拥有和控制的个人信息发生意外或非法破坏、丢失、更改或未经授权披露或访问的风险。

CONTACT INFORMATION

联系方式

If you have any questions, concerns, complaints, or suggestions about this Notice, would like to exercise your privacy rights under applicable laws, or otherwise need to contact us, please contact us at the below. Email communications are not always secure, so please do not include any sensitive information in your email to us.

如果您对本声明有任何疑问、顾虑、不满之处或建议，或者您希望根据适用法律行使您的隐私权，或您需要与我们联系，请通过以下地址与我们联系。电子邮件通信并非绝对安全，因此请勿在发送给我们的电子邮件中提供任何敏感信息。

YETI Outdoor Products (Shanghai) Company Limited

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