



CHINA ADDENDUM TO HFW'S PRIVACY NOTICE

During the course of working with you, or the organisation you work for, we may collect, process and transfer personal information in relation to your matters. If Holman Fenwick Willan LLP's offices in Shanghai or Shenzhen ("**HFW China**") collect personal information about you, or if you or your employer (or any relevant third parties) provide personal information about you to HFW China, this Addendum will apply. This Addendum supplements and forms an integral part of [HFW's Privacy notice](#).

This Addendum explains how HFW China handles your personal information including sensitive personal information, it discloses the potential overseas recipients who may receive your personal information, and it outlines your data privacy rights and how you can exercise those rights in China.

WHAT PERSONAL INFORMATION WE COLLECT

We collect your personal information in different scenarios depending on how you interact with us. The type of data we collect, and the purposes for which we use it are summarised in the table below.

| Personal Information Involved | Scenario of Collection | Purpose of Processing |
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| <ul style="list-style-type: none">• Identity: First name, last name, company name, your username and password (if you use the HFW Claims Portal or other HFW IT services), and, if you are contacting us to exercise your data protection rights, photographic and residential identification documents.• Contact: Email addresses and telephone numbers.• Technical and Usage: Your login data if you use HFW's Claims Portal, browser type and version, time zone setting and location (limited to your city), browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website, receipt and clicks on emails we send from our automated email system, and information about how you use our Website.• Marketing and Communications: Preferences on receiving marketing from us and communication preferences.• Interests and Engagement with the Firm: Information on our past interactions with you, your interests, preferences and feedback.• Service History: includes details about services (and products) you have requested and/or purchased from us.• Other: Any other information you give us in communications, which might include | FOR VISITORS TO OUR WEBSITE | <ul style="list-style-type: none">• To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).• To respond to enquiries from you.• To use data analytics to improve our Website, services, marketing, customer relationships and experiences.• To provide you with value added services such as legal updates and relevant events.• To make suggestions and recommendations to you about services (or goods) that may be of interest to you. |

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| <p>details about your employment or, in emergency situations, 'special category' personal data such as health information. For events, this may include dietary or special assistance requirements.</p> | | |
| <ul style="list-style-type: none"> • Identity: First name, last name, title, date of birth, gender, company name (if applicable), your username and password (if you use the HFW Claims Portal or other HFW IT services), and in some cases photographic and residential identification documents. • Contact: Home and work address, as appropriate, telephone numbers, fax numbers, and email addresses. • Employment: Organisation name, position/title, employment history, professional specialism and qualifications. • Service History: Details about services and products you have requested or we have provided to you or your organisation. • Marketing and Communications: Preferences on receiving marketing from us and communication preferences. • Interests and Engagement with the Firm: Professional and personal interests, requests made in the past, interaction and engagement with the firm e.g. attendance at events. • Financial: In some limited circumstances where an individual's financial information is used or where the company's details can be said to be 'personal data', bank details and transaction history. • Other: We may receive information during the provision of legal services (e.g., case-related or incidental to our business relationship) or for event requirements (e.g., dietary or special assistance). This may include special category data such as health, ethnic or racial origin, trade union membership, political or religious beliefs, and in rare cases sex life or sexual orientation. We are unlikely to receive biometric or genetic data but may receive criminal records data if relevant to the matter. | <p>FOR CLIENT CONTACTS</p> | <ul style="list-style-type: none"> • To open a new client file or matter file, including conducting the checks required by applicable laws and regulators, or to refresh such checks. • Communicating with you on client matters in order to fulfil our instructions, otherwise provide legal advice, or to discuss our services or fees. • The provision of legal services. • To respond to any complaints or claims and to carry out customer satisfaction research. • To develop our business profile and analyse our business trends and profiles. • To provide you with value added services such as legal updates and relevant events. • To make suggestions and recommendations to you about services (or goods) that may be of interest to you. • To update our records, to process for audit and insurance purposes, and to administer claims on our own behalf. • To ensure that we receive payment. • To comply with our legal and professional obligations, for example towards the Court, to comply with legislation on money laundering or terrorist financing, or to comply with privacy laws. • To enable third party service providers such as counsel or expert witnesses to carry out any of the purposes set out above on our behalf. • To enable us to operate effective office facilities, including ensuring adequate security measures are in place. |

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| <ul style="list-style-type: none"> • Identity: First name, last name, title, date of birth, gender, company name (if applicable), your username and password (if you use HFW IT services). • Contact: Home and work address, as appropriate, telephone and fax numbers, and email addresses. • Employment: Organisation name, position/title, employment history, professional specialism, qualifications. • Service History: Details about services and products you have requested (value added services rather than legal services) or we have provided to you or your organisation. • Marketing and Communications: Preferences on receiving marketing from us and communication preferences. • Interests and Engagement with the Firm: Professional and personal interests, requests made in the past, interaction and engagement with the firm e.g. attendance at events. • Other: We may from time to time receive other information from or about you, for example if you are due to join us at a sporting event but cannot because of an injury, or if you give us your dietary preferences for catering purposes. Some of this may be 'special category personal data', for example if it indicates your health or religion. | <p style="text-align: center;">FOR BUSINESS CONTACTS</p> | <ul style="list-style-type: none"> • To provide you with value added services such as legal updates and relevant events. • To make suggestions and recommendations to you about services (or goods) that may be of interest to you. • To develop our business profile and analyse our business trends and profiles. • To update our records, to process for audit and insurance purposes, and to administer claims on our own behalf. • To respond to any complaints. • To enable us to operate effective office facilities, including ensuring adequate security measures are in place. |
| <ul style="list-style-type: none"> • Identity: First name, last name, title, date of birth, gender, company name (if applicable), your username and password (if you use the HFW Claims Portal or other HFW IT services), and in some cases photographic and residential identification documents. • Contact: Home and work addresses as appropriate, telephone and fax numbers, and email addresses. • Employment: Organisation name, position/title, employment history, professional specialism, qualifications. • Interests and Engagement with the Firm: Professional and personal interests, | <p style="text-align: center;">FOR THIRD PARTIES INVOLVED IN CLIENT MATTERS</p> | <ul style="list-style-type: none"> • Communicating with you on our client's instructions in order to progress our client's matters. • Gather information relevant to our client's matters, or otherwise process your information to provide legal services to our clients. • To make or receive payments on our client's behalf. • To update our records, to process for audit and insurance purposes, and to administer claims on our own behalf. • To comply with our legal and professional obligations, for example towards the Court, to comply with |

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| <p>requests made in the past, interaction and engagement with the firm.</p> <ul style="list-style-type: none"> • Financial: In some limited circumstances where an individual's financial information is used or where the company's details can be said to be 'personal data', bank details and transaction history. • Other: We may receive information during the provision of legal services, depending on the type of matter (e.g., witness statements, correspondence, transaction or court documents). This may include special category data such as health, ethnic or racial origin, trade union membership, political or religious beliefs, and in rare cases sex life or preferences. We are unlikely to receive biometric or genetic data but may receive criminal records data if relevant to the matter. | | <p>legislation on money laundering or terrorist financing, or to comply with privacy laws.</p> <ul style="list-style-type: none"> • To enable third party service providers such as counsel or expert witnesses to carry out any of the purposes set out above on our behalf. • To enable us to operate effective office facilities, including ensuring adequate security measures are in place. |
| <ul style="list-style-type: none"> • Identity: First name, last name, title, company name (if applicable), and in some cases photographic and residential identification documents. • Contact: Home and work addresses, as appropriate telephone and fax numbers, and email addresses. • Employment: Organisation name, position/title, employment history, professional specialism, qualifications. In certain circumstances, we may collect details of your salary or training records. • Service History: Details about services we have requested from you or which you have provided to us. • Interests and Engagement with the Firm: Professional and personal interests (as appropriate), interaction and engagement with the firm. • Financial: In limited circumstances or where a supplier is a sole trader or unlimited liability partnership, bank details and transaction history. • Movement: If you work on HFW's premises for extended periods, we may record your entry and exit to and from the premises, and your movements throughout the premises. | <p>FOR SUPPLIERS, SERVICE PROVIDERS, AND THEIR PERSONNEL</p> | <ul style="list-style-type: none"> • To assess your suitability, or your organisation's suitability, to provide the services we require. • To appoint you or your organisation to carry out services on our behalf or on behalf of our clients, to communicate with you throughout the provision of such services, and to ensure that such services are carried out to our satisfaction. • To make payments to or receive payments from you or your organisation. • To update our records, to process for audit and insurance purposes, and to administer claims on our own behalf. • To provide you or your organisation with references and recommendations. • To enable us to operate effective office facilities, including ensuring adequate security measures are in place. |

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| <ul style="list-style-type: none"> • Other: Information we receive during the course of your provision of services to us. | | |
| <ul style="list-style-type: none"> • Identity: First name, last name, company name (if applicable). • CCTV Images • Preferences and Requirements: Your dietary preferences, including 'special category' personal data where this is for religious or health reasons, or disability data required for access or comfort purposes. • Other: Information we receive during your visit. | <p>FOR VISITORS TO OUR OFFICES</p> | <ul style="list-style-type: none"> • To ensure the security of our building, for the prevention of crime and terrorism. • To ensure compliance with our emergency and health and safety procedures. • To provide you with suitable refreshment. • To confirm your attendance or location to assess contract performance. • To enable us to operate effective office facilities, including ensuring adequate security measures are in place. • To update our records, to process for audit and insurance purposes, and to administer claims on our own behalf. |
| <ul style="list-style-type: none"> • Information from Your Application: Data from application forms, CVs or resumes, identity documents (e.g., passport or driving licence), and your correspondence with us, including interviews, meetings and assessments. • Information from Third Parties: References from former employers or colleagues, data from background check providers and credit reference agencies, and criminal records checks where permitted by law. • Information from Social Media: Publicly available profile data (e.g., LinkedIn, Facebook, Instagram), reviewed where legally permissible, as part of background screening by an external vendor to manage reputation risk. | <p>FOR APPLICANTS INCLUDING EARLY CAREER OPPORTUNITIES</p> | <ul style="list-style-type: none"> • To run recruitment processes. • To maintain accurate and up-to-date contact details. • To obtain occupational health advice, to ensure that it complies with duties towards individuals with disabilities, meet its obligations under health and safety law. • To ensure effective general HR and business administration. • To respond to and defend against legal claims. • To comply with its legal and regulatory obligations. • To safeguard and protect the firm's reputation. • To maintain and promote equality in the workplace. |
| <ul style="list-style-type: none"> • Identity: First name, last name, title, organization name, e-mail, job position, and professional specialism. • Contact: Email addresses. • Technical and Usage: Your login data if you use HFW's IT services, browser type and version, time zone setting and location (limited to your city), browser plug-in types and versions, operating system and | <p>FOR WEBINARS</p> | <ul style="list-style-type: none"> • To administer access to and provide the relevant webinar. • Monitoring the duration of your attendance for business development purposes and to gauge interest in and engagement and satisfaction with the relevant webinar. • To respond to your questions before, during and/or after the webinar. |

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| <p>platform, IP address and other technology on the devices you use to access our Website, receipt and clicks on emails we send from our automated email system, the time of your registration for the webinar, whether you attended the live webinar and/or viewed an archived recording, for how long you watched the webinar (live and/or archived), and whether you have any problems hearing the audio or seeing the slides.</p> <ul style="list-style-type: none"> • Service History: Details about services and products you have requested, or we have provided to you or your organisation. • Marketing and Communications: Preferences on receiving marketing from us and communication preferences. • Interests and Engagement with the Firm: Professional and personal interests, interaction and engagement with the firm e.g. feedback forms, poll responses, questions and responses and your attendance at events. • Personal Data Captured in Webinar Recordings: We may record webinars so those unable to attend can access them later. If you ask or answer questions, or otherwise interact, your audio may be captured. For smaller interactive webinars, your video may also be recorded if you turn on your camera. We will always inform you in advance if audio or video will be recorded. • Other: Information we receive in the context of hosting webinars not otherwise covered above. | | <ul style="list-style-type: none"> • To collect your poll responses where this is required to develop an understanding of your and other audience member needs. • Feedback questionnaires and post-event communications to help determine areas for improvement or how/whether to provide more relevant events/communications. • To provide individuals who are unable to attend the webinar an opportunity to access a recorded version. • To let other webinar audience members know that you are an audience member, if contemplated by the format of the webinar and a feature of the webinar platform and where you have not turned off the relevant functionality. |
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STORAGE OF YOUR PERSONAL INFORMATION

Your personal information collected and processed by HFW China will be stored within mainland China as well as transferred to overseas recipients as outlined below. We will implement appropriate administrative, technical, and physical safeguards to protect your personal information during the storage period.

TRANSFERS OF YOUR PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

HFW is an international law firm and, as part of its business, HFW China may transfer your personal information to other HFW offices based outside of China for the purposes of business development, business acceptance processes related to client management, and for the provision of legal services, including communicating with relevant parties and individuals, and complying with the firm's contractual, legal and

regulatory obligations. In addition, your personal information may be shared with foreign judicial or law enforcement bodies in compliance with applicable local laws and regulations.

In certain cases, your personal information may be transferred to overseas third-party experts or advisors who are engaged by HFW China to provide services on your behalf during the course of a client matter.

Your personal information may also be sent to overseas third-party vendors who are engaged by HFW China to provide various infrastructure and operational support services and products. This is required to enable the firm to provide legal services to its clients and/or for the ongoing management and administration of the firm.

For any cross-border data transfers of your personal information to overseas recipients, we endeavour 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.

We set out below the types of personal information that we may transfer outside of mainland China:

- Your name, proof of address, gender, date of birth, government issued ID numbers, photographs of you;
- Contact data, including email addresses and telephone numbers (home and work);
- Job title, role, grade, job description; details of directorships;
- Contractual data, including copies of employment contracts or details of directorships;
- Employment data, including employee number, employment history including copies of CVs;
- Financial data, including bank details, salaries, tax filing records, investment information, pensions, benefits, loans granted, received, surrendered, or repaid;
- Ethnicity to the extent that such information is shown on government ID cards, which HFW China collects for business acceptance and client due diligence purposes;
- Personal characteristics and social circumstances.

If you require further information about the transfer of your personal information to overseas recipients, or if you wish to contact any overseas recipients, please email the firm's Global Privacy Officer at privacy@hfw.com.

HOW WE HANDLE YOUR PERSONAL INFORMATION

Source(s) of your personal information

We obtain your personal data directly from you, our clients, other persons who may be relevant or involved in your affairs, and their respective representatives and employees. Moreover, we collect personal data from third parties such as employers, other organisations with which you are a contact, regulatory authorities, government agencies, courts, and other law firms or other professional advisors. We also get personal data from publicly accessible sources (such as but not limited to commercial registers, land registries and debt collection agencies).

We collect and process personal data in order to perform our services (e.g. contract formation, execution and administration), to carry out our mandates and to manage our firm's business (e.g. to carry out administrative and organisational processes, risk management).



Purpose(s) of processing your personal information

The purposes for which we process your personal information are as set out in the table above.

Lawful bases for processing your personal information

The legal bases, under China's Personal Information Protection Law (PIPL), which we rely on to process 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.

HOW WE HANDLE YOUR SENSITIVE PERSONAL INFORMATION

We may process your sensitive personal information if you have voluntarily disclosed it to us, or if it is required by applicable laws and regulations, for example, as part of us verifying your identity and ensuring compliance with our internal client due diligence and business acceptance processes. Specifically, the types of sensitive information that we may process about you are your government issued ID numbers, photographs, your financial data, and ethnicity and health data.

When processing your sensitive personal information, due to the potentially significant adverse consequences that may arise if this information was to get lost, stolen, or accessed by an unauthorised third party, we will seek your informed consent where we are required to do so, and we will ensure that any sensitive personal information is protected with strong technical and organizational safeguards, which includes (but is not limited to) encryption, access controls, training, and our internal data incident response policy and associated procedures.

If you refuse to provide us with your sensitive personal information where we are required to process it by applicable laws or regulations, we may not be able to fulfil your request or provide you with the requested legal services.

RETENTION AND DISPOSAL OF PERSONAL INFORMATION

We will retain your personal information only for the minimum period necessary to achieve the purposes stated in HFW's Privacy Notice and this Addendum, and for the period required to comply with applicable laws and regulations.

Where a specific retention period is prescribed by applicable laws or regulations, we will retain your personal information for at least that period. If it is not possible to determine the specific retention period at the time of collection, we will determine the retention period based on reasonable criteria (for example, by reference to



the duration of our contractual relationship with you, the statutory limitation periods, or applicable industry practices).

When the applicable retention period expires, or when the purposes of processing have been fulfilled, we will delete or anonymize your personal information, unless continued retention is required in order to comply with legal or regulatory obligations.

CHILDREN'S PERSONAL INFORMATION

Our services are not directed at children under the age of 14. We do not knowingly collect or retain personal information from children under 14 years old, except where it is necessary for the provision of legal services, to comply with our professional obligations, or where otherwise required by law.

If you or your organisation provides us with personal information of a child under 14, you must ensure that you have obtained the consent of the child's parent or legal guardian before doing so. We will protect the confidentiality and security of children's personal information in accordance with applicable laws and regulations.

If you believe that we have inadvertently collected personal information from a child under 14 without proper consent, please contact us at privacy@hfw.com.

YOUR RIGHTS

If you have submitted personal information to HFW China, you have the following rights:

- **Access:** You have the right to access to that data.
- **Copy:** You have the right to obtain copies of the personal information we hold about you, and you may request that such copies be provided to you in electronic form.
- **Data Portability:** You have the right to request the transfer of your personal information to another data controller, to the extent permitted by applicable laws.
- **Correction:** If the information we hold about you is incorrect, you may ask us to correct any inaccuracies in your personal information.
- **Object to processing:** You may have the right to object to us processing your personal information if we are not entitled to use it anymore.
- **Withdrawal of consent:** Where we process your personal information on the legal basis of the consent from you, you have the right to withdraw your consent at any time by contacting HFW China at the email address below (note: withdrawal of consent does not affect the validity of our consent-based personal information processing prior to the withdrawal).
- **Deletion:** In addition, you may have rights to have your information deleted if we are keeping it too long, have its processing restricted in certain circumstances.
- **Right to Explanation:** You have the right to request an explanation of HFW's Privacy Notice (including this Addendum) from HFW China.

We will respond to any data subject requests within 15 working days of receiving such request.

EXERCISING YOUR RIGHTS



If you would like to exercise your personal information rights, you may write to the firm's Managing Office Partner of HFW China at: 4th Floor, Building 7, 18 Gongping Road, Hongkou District, Shanghai 200082 or you may send an email to privacy@hfw.com.

If you wish to make a complaint, you may contact the competent supervisory authority in China (the Cyberspace Administration of China (CAC)), but please contact us first so that we can try to address your concern(s) and/or answer your questions.

CHANGES TO THIS ADDENDUM

We reserve the right to update and change this Addendum, from time to time, to take into account any changes in how we process your personal information and/or changes in applicable laws and regulations.

Last reviewed/updated: **September 2025**