

# 《隐私保护声明》

Aon是一家世界领先的专业服务公司，提供广泛的风险管理、退休计划 and 健康福利解决方案。Aon致力于保护您的隐私。该承诺体现了我们重视获得客户、业务伙伴以及与我们共享其个人信息的其他方的信任，并重视保护这份信任。

## 本《隐私保护声明》的目的是什么？

本《隐私保护声明》（以下简称“本声明”） 将向您说明我们在为您提供人才服务的过程中如何收集、存储、使用、处理、传输、提供、披露、删除（统称为“处理”）您的个人信息。其中涉及我们的评估和反馈系统。

## 我们是谁？

在本声明中，“Aon”指怡安企业服务（上海）有限公司（也称为“我们”或“我们的”）。若要了解本《隐私保护声明》内包含的信息和相关服务，您可以通过以下方式联系我们：

**地址：**上海市淮海中路381号中环广场38楼

**邮编：**200020

**电子邮箱：**cn.privacy@aon.com.cn

您还可以通过上述方式联系我们的数据保护官。

## 谁负责您的个人信息？

我们代表客户并根据客户的指示，作为个人信息的受托处理者提供人才服务。 我们的客户将对如何处理您的个人信息负主要责任，这使他们成为个人信息的处理者。您的个人信息处理者是您为其完成此评估/反馈的实体。您也可以直接与他们联系，或参考他们的隐私声明，以了解他们对您个人信息的处理活动以及和您个人信息权利的内容。

我们在本声明中将明确指出了我们作为个人信息处理者收集的信息（即通过您的设备cookie 收集的个人信息；处理您的个人信息用来进行安全认证），对于其他个人信息，您的雇主是个人信息处理者而我们是受托处理者。

## 我们何时以及怎样收集您的信息？

我们通过两种方式收集您的个人信息：(i) 由我们的客户提供给我们，以便为您提供服务以及 (ii) 直接在您使用我们的服务过程中从您本人处收集。

请注意：我们不会出售您的个人信息。我们仅将您的个人信息回传给为此服务与我们签订合同的客户或者除此之外在提供服务过程中与我们直接相关的各方。

## 我们如何处理您的个人信息？

根据我们与客户之间的合同关系，我们使用您的个人信息，以便提供我们的人才服务，包括：

### (i) 提供评估服务。

为了按照客户的要求向您提供评估服务，我们将收集您的以下个人信息：**识别信息（您的称谓、名字和姓氏、邮箱地址、电话号码）**；**评估信息（您的答案、测试时长、评估结果）**。客户处理评估信息的法律依据可能是此类处理对于履行合同或者采取程序（根据您的要求）签订合同为必需，也即完成评估是获得雇佣或维护职位的一个必要步骤。如果您不提供相应的个人信息，我们将无法按照客户的指示开展服务，实现评估目的。这意味着参与评估是自愿行为，即便这可能影响您与我们的客户之间的关系。如果客户具有其他法律依据，则其将另行告知。

### (ii) 提供安全保障

我们将收集您的：技术及设备信息（公共IP地址、访问时间和日期、浏览活动、浏览器设置、设备信息和登录ID数据），用于安全用途，也即进行验证和输入控制。

### (iii) Cookie

在您使用我们的人才服务过程中，将会在您的设备上存储Cookie。这些Cookie可能包括：

Cookie	用途	时长
ASP.NET_SessionId	此会话 cookie 使得网站内能够识别用户。	Session
CookieCandidateToken	该cookie用于存储用户的语言信息。	Session

从功能方面来讲，这些Cookie对于提供服务是必需的 —— 这表示从技术角度来讲，它们对于确保我们的系统正常运行是非常重要的。您可以通过设置您的网络浏览器避免存储Cookie，或者通过管理您的设置实现在关闭浏览器之后删除这些Cookie。请注意：完全禁用Cookie将会对您使用本服务（尤其是其质量）产生影响。有关Cookie的禁用或者删除，您还可以通过gdpr.assessment@aon.com 联系Aon。

我们不利用任何第三方或者跟踪Cookie提供该项服务。您可以通过跳转到我们的“Cookies”超链接或者重新查看本声明随时轻松重新查看该信息。

### (iv) 处理敏感个人信息

我们可能会依据法律法规和本声明的约定处理您的敏感个人信息（*可能包含在您回答测试问题的答案中*）。您同意本隐私声明，即表示您同意我们处理您的敏感个人信息。如果您不同意我们处理此类敏感信息，我们可能无法向您提供服务和/或我们可能会立即终止提供的服务。如果您需要撤回您的同意，您可以通过本声明所述的方式联系我们行使您的权利。

## 我们从儿童处收集信息吗？

我们不直接为儿童提供服务，而且我们也不会故意从儿童处收集个人信息，除非我们的客户给出指示。

## 我们会将您的个人信息保留多久？

我们不会在我们所需的上述所述用途之外延长您的个人信息存储期限。通常情况下，保存期限由我们的客户决定。在我们未收到其特别指示的情况下，我们将您的个人信息存储12个月。在此之后，您的个人信息将被不可撤销地匿名处理或者删除。除此之外，我们仅根据任何适用的法律要求存储您的个人信息。

## 我们会披露您的个人信息吗？

我们与我们的客户（也即我们与其签订了合同协议的业务实体）共享您的个人信息。除此之外，我们仅在以下范围内共享您的个人信息：

### Aon内部

我们可能与Aon其他实体、品牌、部门和子公司共享您的个人信息，以便提供评估服务。

我们不会将个人信息出租、出售或以其他方式披露给非附属第三方。除了我们的客户以及下文讨论的情形之外，我们不会与其他第三方共享您的个人信息。

### 授权服务提供商

我们可能将您的个人信息披露给代表我们聘用的服务提供商（*作为委托处理者*）。这些服务供应商受到合同限制，不得使用或披露这些信息，除非是在代表我们提供服务或遵守法律规定的情况

下。

**法律要求和业务转让**

我们可能在以下情形下披露个人信息：(i) 法律、诉讼程序、法规、规定、规章制度或专业标准要求或者为了响应传票、搜查令或其他合法请求，(ii) 响应执法机构或其他政府官方要求，(iii) 我们相信披露是为防止人身伤害或财务损失所必需的或合适的，或者(iv) 与调查可疑或实际非法活动相关。此外，还可能出于公司审计或者调查投诉或安全威胁要求而进行披露。

**我们会将您的个人信息跨境传输吗？**

我们通常不会跨境传输您的个人信息，除非我们与客户就此达成一致。如果我们获得许可或者如果您是您的个人信息处理者，则我们可以跨境传输您的个人信息，但我们将另行获得您就跨境传输的单独同意。我们是一家全球性机构，因此可能会将某些个人信息传输给在其他国家根据适用法律代表我们提供服务的授权服务提供商或业务伙伴。我们的附属公司和第三方可能位于本地，也可能位于境外。

当我们跨境传输数据时，我们将利用各种法律机制确保您享有相关的权利并保护您的个人信息：

- 我们将确保在 Aon 范围内传输数据符合中国网信部门颁布的标准合同条款，或适用当地法律规定的其他类似机制，通过合同条款规定各Aon实体确保个人信息在其所驻留地域内获得一致、适当的保护；
- 当我们对外传输您的个人信息或者将其传输给为我们提供产品和服务的第三方时，我们会与其签署有约束力的协议以保护您的个人信息。通常，这是通过缔结适用的标准合同条款，或其他适用的当地法律建立的类似合同机制实现的；以及
- 当我们收到执法机构或者监管机构提供个人信息的要求时，我们会在披露任何个人信息之前对这些要求进行核实。

如果您想进一步了解您的个人信息是否会被披露给海外接收者，请通过上文所述方式联系我们。此外，您还可以联系我们，了解更多有关我们为确保护您的个人信息以上述方式进行传输时获得足够保护而已经实施的保护措施（包括一份出于商务保密原因可能已进行编辑的相关合同承诺的副本）。

**我们是否切实实施了安全措施以保护您的信息？**

您的个人信息安全对于我们至关重要，我们已经实施合理的物理、技术和行政管理安全标准，保护个人信息免于损失、误用、更改或破坏。我们利用安全技术和规程（例如数据加密和限制访问）保护您的个人信息免于遭受非经授权的访问、使用或披露。只有经过授权的人员才可以访问您的个人信息，并且他们已经接受了有关保护个人信息重要性的培训。

我们的服务提供商和代理商受合同条款制约，对个人信息进行保密，而且不可将此类信息用于任何非授权用途。

**有关您个人信息的其他权利**

数据保护法在每个国家有所不同，在一些国家内可能会提供更多保护。根据某些豁免，以及在某些情形下，尤其是如果您居住在具有适用隐私法的管辖区内，您享有与您的个人信息相关的某些权利。

您可以通过联系我们行使您的权利。请注意：当我们客户作为个人信息处理者时，您的申请将会与我们的客户共享，他们对于回应申请承担最终的责任。

出于合法的和其他允许的考虑，我们将竭尽所能及时处理您的申请或者告知您我们为了满足您的申请是否需要更多信息。我们可能无法总是彻底解决您的申请，例如：如果申请可能影响我们对于其他方的保密义务，或者如果我们依法有权以不同的方式处理申请。

**访问权**

您有权访问我们所保留的您的个人信息及其分类。

**修正权**

当您的个人信息不准确或者过期时，您有权要求我们对其进行更正。

**删除权**

在某些情形下您有权删除您的个人信息。当您个人信息的处理目的已经实现或我们没有其他处理您个人信息的法律依据时，您的个人信息将会被删除。

**限制处理权**

您有权限制对您的个人信息进行处理，但是仅限于以下情形：

- 其准确性受到争议，允许我们对其准确性进行核实；或者
- 处理不合法，但是您不想将其删除；或者
- 对于所收集用途而言不再必要，但是我们仍然需要其提起、行使或辩护法律主张；或者
- 您已经行使反对权，且有待执行凌驾性理由核实。

**转移个人信息的权利**

您有权要求以常用的可读格式向您或其他个人信息处理者提供个人信息，但前提是该等个人信息的处理基于：(i)同意;(ii)履行您作为一方当事人的合同所必需。

**反对处理权**

**您有权随时反对针对您的个人信息进行处理，但是仅在该处理是基于您的同意而作出的情形下。如果您提出反对意见，我们将向您说明我们处理您个人信息的相关合法基础。**

**自动化决策**

Aon作为服务提供商不会采用仅基于自动化决策流程的系统，因此不会制定对于您具有法律或类似严重影响的此类决策。有关您是否将会获得职位等最终决策由我们的客户定夺。

但是，在我们的评估服务内，Aon确实为客户提供简化申请流程的程序。支持此类自动程序的Aon逻辑是获取您的评估答复，将其与我们已经通过基于统计、科学和心理的专业知识（通常以算法的形式）开发的研究模型和行业知识进行对比。例如，您在初始测试中输入的内容可能被进行计算，以便自动决定您是否适合继续进行后续测试。客户之后可能根据您的最终评估结果自动决定是否将您的申请推进到下一程序。

如果您希望在自动化决策和/或资料收集过程中获得人工介入、希望表达您的观点和/或在这种情形下对做出的决定提出异议，请通过**cn.privacy@aon.com.cn** 联系Aon或者直接联系我们的客户。

**撤回同意**

如果您已经针对特定处理活动表示同意，您有权撤回将于未来生效的该同意。若要撤回您的同意，请通过 **cn.privacy@aon.com.cn** 联系Aon或者直接联系我们的客户。

**跨境传输**

如上所述，您可以要求获得一份依据其将您的个人信息传输至境外的保护措施副本或者参考文本。

**联系我们**

如果您有任何其他问题或疑问，请联系：

**地址：上海市淮海中路381号中环广场38楼**

**邮编：200020**

**电子邮箱：cn.privacy@aon.com.cn**

**本声明变更**

我们可能随时对本声明进行更新。当我们进行更新时，我们会在本网站上发布最新版本，同时修改位于本页面底部的版本日期。

此《声明》最后更新于2025年1月。

# Privacy Notice

Aon is a leading global professional services firm providing a broad range of risk, retirement, and health solutions services. Aon is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us.

**What does this Privacy Notice do?**

This Privacy Notice ("Notice") explains how we collect, store, use, process, transfer, provide, disclose, delete (collectively as "Handle") your personal information in connection with our talent services. This includes our assessment and feedback systems.

**Who are we?**

Throughout this Notice, "Aon" refers to Aon Enterprise Solutions (Shanghai) Co., Ltd., (also referred to as "we", "us", or "our"). You can contact us regarding information contained within this Privacy Notice and the associated services:

**381 Huai Hai Middle Road  
Shanghai Central Plaza, 38/F  
Shanghai, 200020  
China**  
**Email: [cn.privacy@aon.com.cn](mailto:cn.privacy@aon.com.cn)**

Our Data Protection Officer can be contacted using these same details.

**Who is responsible for your personal information?**

We provide talent services as an engaged processor on behalf of and in accordance with the instructions of our customer. Our customers are primarily responsible for decisions about your personal information. This makes them the personal information handler. Your handler is therefore the entity for whom you complete this assessment/feedback. You can also contact them directly or refer to their privacy notice for more information about their practices and your personal information rights.

We have expressly indicated throughout this Notice where personal information is collected by us as a personal information handler (namely, personal information collected by cookies stored on your device; personal information collected for authentication and input control). For all other circumstances, our customer is the personal information handler, and we are an engaged processor.

**When and how do we collect your information?**

We collect your personal information in two ways: (i) provided to us by our customer to provide you with the service, and (ii) collected from you directly whilst you use our services.

Please note that we do not sell your personal information. We only provide your personal information back to the customer who contracted us for the services, or otherwise parties directly involved with us in providing the services.

**How do we use your personal information and what is the legal basis?**

We Handle your personal information to provide our assessment services in accordance with the contractual relationship we have with our customers as follows:

**(i) The provision of the assessment services.**

In order to provide you with our assessment services as instructed by our customers, we will collect your following personal information: identification information (your title, first and last name, email address, phone number); your assessment Information (your answers, test duration, assessment results). The legal basis of our customer for the processing of assessment information is such processing being necessary for the performance of a contract, or to take steps (at your request) to enter into a contract, namely that completing the assessments is a necessary step in obtaining or maintaining an employment position. Without the provision of your personal information, we would not be able to carry out the services to achieve this. This means that participating in the assessments are voluntary, although this may affect your relationship with our customer. If the customer has an alternative legal basis, they will notify you of this separately.

**(ii) The provision of safety services**

We may collect your technical Information (public IP address, time and date of access, browser activities, browser settings, device information and Log-In ID data). This is used primarily for security purposes, namely authentication and input control.

**(iii) Cookies**

When using our talent services, cookies are stored on your device. These cookies can include

Cookie	Purpose	Duration
ASP.NET_SessionId	This session cookie enables users to be recognized within a website.	Session
CookieCandidateToken	This cookie is used to store the language info of the user.	Session

These cookies are functionally necessary to offer the service – this means they are technically important for making sure our systems work correctly. You can prevent the storage of cookies through the settings of your web browser, or by managing your settings so that cookies are deleted once you close your browser. Please note that a complete disabling of cookies will impact on your ability to use this service, especially upon its quality. You can also contact Aon at [gdp&r.assessment@aon.com](mailto:gdp&r.assessment@aon.com) about disabling or deleting cookies.

We do not employ any third-party or tracking cookies to provide this service. You can easily revisit this information any time by going to our "Cookies" hyperlink or revisiting this Notice.

**(iv) The handling of sensitive personal information**

We may Handle your sensitive personal information (*included in your answers to the assessment*) in accordance with laws and regulations and as agreed in the Notice. By signifying your consent to this Notice, you consent to our handling of your sensitive personal information. If you do not consent to our handling of such sensitive personal information, we may be unable to offer the services to you and/or we may terminate the services provided with immediate effect. If you need to withdraw your consent, you may exercise your rights by contacting us through the method as described in this Notice.

**Do we collect information from children?**

We do not directly provide services to children, and we do not knowingly collect personal information from children, unless otherwise directed by our customer.

**How long do we retain your personal information?**

We do not store your personal information for any longer than we need to for our above stated purpose. Generally, the period of our handling is decided by our customer. Where we do not receive specific instructions from them, we store your personal information for a period of twelve months. After this, they are either irrevocably anonymized or deleted. Beyond this, we only store your personal information pursuant to any applicable legal requirements.

## **Do we disclose your personal information?**

We share your personal information with our customer, that is, the business entity with which we have a contractual arrangement. Beyond this, we only share personal information as follows:

### ***Within Aon***

We may share your personal information with other Aon entities, brands, divisions, and subsidiaries to provide the assessment services.

We do not rent, sell or otherwise disclose personal information with unaffiliated third parties. We do not share your personal information with third parties except with our customer and in the following circumstances discussed below.

### ***Authorized Service Providers***

We may disclose your information to service providers we have retained (as *processors*) to perform services on our behalf. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements.

These third parties appropriately safeguard your personal information, and their activities are limited to the purposes for which your personal information was provided.

### ***Legal Requirements and Business Transfers***

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request, (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or (iv) in connection with an investigation of suspected or actual illegal activity. Disclosure may also be required for company audits or to investigate a complaint or security threat.

## **Do we transfer your personal information across geographies?**

We generally do not transfer your personal information cross border unless we have agreed to do so with our customer. Where we are permitted by our customer to transfer your personal information cross border in such a way, or are ourselves the handler for your personal information, we may do so, and we will obtain your separate consent for the cross-border transfer of personal information. We are a global organization and may transfer certain personal information across geographical borders to our authorized service providers or business partners in other countries working on our behalf in accordance with applicable law. Our affiliates and third parties may be based locally, or they may be overseas.

When we do, we use a variety of legal mechanisms to help ensure your rights and protections travel with your personal information:

- we ensure transfers within Aon are covered by agreements based on the standard contractual clauses issued by CAC (Cyberspace Administration of China), or other similar mechanisms under applicable local law, which contractually oblige each member to ensure that personal information receives an adequate and consistent level of protection wherever it resides within;
- where we transfer your personal information outside of us or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. This is achieved typically through the conclusion of the standard contractual clauses issued by CAC, or other similar contractual mechanisms under applicable local law.;
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

If you would like further information about whether your personal information will be disclosed to overseas recipients, please contact us as noted above. You also have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments, which may be redacted for reasons of commercial confidentiality) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

## **Do we have security measures in place to protect your information?**

The security of your personal information is important to us, and we have implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

### **Other rights regarding your personal information**

Data protection laws vary among countries, with some providing more protection than others. Subject to certain exemptions, and in some cases, particularly if you reside in a jurisdiction with applicable privacy laws, you have certain rights in relation to your personal information.

You can exercise your rights by contacting us. Please note that if our customer is personal information handler, your request will be shared with our customer, and our customer hold the ultimate responsibility for responding to the request.

Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfil your request. We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### ***Right to Access***

You have the right to access personal information, and the categories thereof, which we hold about you.

### ***Right to Rectification***

You have the right to request that we correct your personal information where it is inaccurate or out of date.

### ***Right to be Forgotten (Right to Delete)***

You have the right to request under certain circumstances to have your personal information erased. Your information will be erased if your personal information is no longer necessary for the purpose for which it was collected, and we have no other legal ground for handling the personal information.

### ***Right to Restrict Processing***

You have the right to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

### ***Right to Transfer (Data Portability)***

You have the right to data portability, which requires us to provide personal information to you or another handler in a commonly used, machine readable format, but only where the handling of that personal information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

### ***Right to Object to handling***

**You have the right to object the handling of your personal information at any time, but only where that handling is based on your consents. . If you raise an objection, we have an opportunity to demonstrate that we have legitimate grounds.**

***Automated Decision Making***

Aon as a service provider does not employ systems based solely on automated decision-making processes and therefore does not make such decisions that have legal or similar significant effects on you. The ultimate decision as to whether you will receive a job offer, for example, remains with our customers.

Within our assessment services, however, Aon does offer processes to customers that streamline the application process. Aon's logic behind such automated processes is to take your assessment responses and compare these with developed research models and industry knowledge, that we have developed through statistical, scientific and psychological based expertise (generally in the form of algorithms). For example, your input into initial tests may be calculated to decide automatically whether you are suitable to move onto further tests. Customers may later decide automatically based on your final assessment results whether to move forward with your application.

If you wish to obtain human intervention in the automated decisions and/or profiling made, you wish to express your point of view and/or you wish to contest a decision made in this context, please contact [cn.privacy@aon.com.cn](mailto:cn.privacy@aon.com.cn) or the customer directly.

***Withdrawal of Consent***

Where you have given your consent for a specific processing activity, you have the right to withdraw this consent with future effect. To withdraw your consent, please contact [cn.privacy@aon.com.cn](mailto:cn.privacy@aon.com.cn) or the customer directly.

***International Transfers***

As noted above, you can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of China.

**Contact us**

If you have any further questions or concerns, please contact:

**381 Huai Hai Middle Road  
Shanghai Central Plaza, 38/F  
Shanghai, 200020  
China**  
Email: [cn.privacy@aon.com.cn](mailto:cn.privacy@aon.com.cn)

**Changes to this Notice**

We may update this Notice from time to time. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page.

This Notice was last updated in January 2025.