

数据隐私政策中国区增补条款

生效日期： 2025 年 12 月 01 日

本增补条款依据《中华人民共和国个人信息保护法》等相关法律法规制定，旨在对 SGL 集团发布的通用数据隐私政策（下称“主政策”）作出适用于中华人民共和国（为本条款之目的，不包括香港特别行政区、澳门特别行政区和台湾地区，下称“中国”）境内处理的补充与特别规定。

本增补条款与主政策共同构成一份完整的法律文件，适用于**西格里特种石墨（上海）有限公司、西格里石墨技术（上海）有限公司及西格里泉海高新材料（山西）有限公司**（统称“我们”或“西格里中国”）在中国境内开展的个人信息处理活动，以及为向中国境内客户提供产品与服务之目的，而在中国境外开展的、涉及中国境内个人信息的处理活动。

如本增补条款之规定与主政策存在任何不一致，应以本增补条款为准。

1. 个人信息的处理

本条款所称“个人信息”、“敏感个人信息”与“个人信息处理”之定义，与《中华人民共和国个人信息保护法》规定一致。

（1）敏感个人信息的处理

对于法律定义的敏感个人信息，我们将在处理前，就具体的处理目的、处理方式及所涉个人信息种类，获取您的**单独同意**。我们将采取严格的加密、访问控制等技术及组织措施予以保护，以防范安全风险。

若您主动向我们提供了他人的个人信息（尤其是敏感个人信息），您应确保已事先取得该个人的充分授权，并承担由此产生的相应责任。

（2）无需征得同意的处理情形

根据中国法律，在下列情形中处理个人信息，无需取得个人同意：

- 1) 为订立、履行您作为一方当事人的合同所必需；
- 2) 为履行法定职责或者法定义务所必需；
- 3) 为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；
- 4) 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；
- 5) 依照法律规定在合理的范围内处理个人自行公开或者其他已经合法公开的个人信息；
- 6) 法律、行政法规规定的其他情形。

2. 未成年人保护

我们明确知晓并严格遵守中国关于未成年人网络保护的规定。我们**不主动**面向未满十四周岁的未成年人提供产品或服务，也不会^{在明知}的情况下收集此年龄段未成年人的个人信息。如您是未成年人的监护人，请关注并管理您的被监护人在网络环境中的行为，避免其在未经您同意的情况下向我们提供任何个人信息。

3. 数据安全与匿名化处理

我们将采取符合中国法律法规及强制性国家标准要求的技术措施和必要管理措施，确保个人信息处理活动合法合规，并防止个人信息遭到未经授权的访问、泄露、篡改和丢失。

依据法律规定对个人信息进行匿名化处理（处理后无法识别特定自然人且不能复原）后所得的信息，**不再属于个人信息**。我们有权在不另行通知您的情况下，将此类匿名化信息用于数据分析、产品改进及商业决策等目的。

4. 个人信息的跨境提供

为在全球范围内提供统一标准的服务、技术支持及进行必要的集团内部管理，我们可能在符合中国数据出境监管要求的前提下，将您的个人信息提供给位于中国境外的关联方。

主要境外接收方：

名称： SGL Carbon GmbH

地址： Werner-von-Siemens-Strasse 18 Meitingen 86405 Germany

在进行任何跨境传输前，我们将根据中国法律规定，采取包括但不限于与境外接收方订立国家网信部门制定的标准合同、进行个人信息保护影响评估并依法取得您的单独同意等一种或多种合规措施，以保障您的个人信息权益。您可以通过主政策中公布的联系方式，向境外接收方行使您在中国法律下的相关权利。

5. 您的个人信息权利

根据中国法律，您对您的个人信息享有以下权利：

- 1) **知情与同意权：** 有权知悉处理规则，并在处理敏感信息等情形下给予单独同意；
- 2) **查阅与复制权：** 有权查阅、复制我们持有的您的个人信息；
- 3) **更正与补充权：** 发现信息有误或不完整时，有权要求我们更正、补充；
- 4) **删除权：** 在法定情形下，有权要求我们删除您的个人信息；
- 5) **撤回同意权：** 对于基于同意进行的处理，有权随时撤回同意，但不影响撤回前基于同意已进行的处理的效力；
- 6) **账户注销权：** 有权要求注销您的账户；
- 7) **自动化决策拒绝权：** 若我们仅通过自动化决策方式作出对您权益有重大影响的决定，您有权要求说明，并有权拒绝仅通过自动化决策作出决定。

您可通过主政策([Data Privacy | SGL Carbon](#))中公布的联系方式向我们提出权利请求。在验证您的身份后，我们将在**十五个工作日**的法定期限内作出答复。对于多次重复、超出合理限度的请求，我们可能会依据法律规定收取必要的成本费用。

在符合法律规定的特定情形下，我们可能无法响应您的请求，例如请求涉及国家安全、国防安全、公共安全等重大公共利益，或有充分证据表明您存在主观恶意或滥用权利等。若我们决定无法响应，将向您说明理由。



6. 联系我们

如您对本增补条款、个人信息处理活动有任何疑问、意见、建议，或希望行使您的个人信息权利，请通过以下方式联系我们：

电子邮件： brook.zou@sglcarbon.com

电话： +86 21 6097-6949

地址： 上海市奉贤区环城东路 151 号

我们将在收到您的请求并完成身份核验后，于十五个工作日内予以答复。如情况复杂，我们将在法律允许的时限内告知您延期情况。

China Addendum to Data Privacy Policy

Effective Date: 1st Dec, 2025

This Addendum is formulated in accordance with relevant laws and regulations of the People's Republic of China, including the Personal Information Protection Law of the People's Republic of China ("PIPL"), and is intended to supplement and provide specific stipulations applicable within the People's Republic of China (for the purpose of this Addendum, excluding the Hong Kong Special Administrative Region, the Macao Special Administrative Region, and Taiwan, hereinafter referred to as "China") to the general Data Privacy Policy issued by the SGL Group (hereinafter referred to as the "Main Policy").

This Addendum, together with the Main Policy, constitutes a complete legal document applicable to the personal information processing activities conducted within China by **SGL Special Graphite (Shanghai) Co., Ltd., SGL Carbon Technology (Shanghai) Co., Ltd., and SGL Quanhai Advanced Materials (Shanxi) Co., Ltd.** (collectively referred to as "we," "us," or "SGL China"), as well as to processing activities conducted outside China involving personal information from within China for the purpose of providing products and services to clients in China.

In the event of any inconsistency between the provisions of this Addendum and the Main Policy, the provisions of this Addendum shall prevail.

1. Processing of Personal Information

The terms "personal information," "sensitive personal information," and "processing of personal information" as used in this Addendum shall have the same meanings as defined in the PIPL.

(1) Processing of Sensitive Personal Information

For processing legally defined as sensitive personal information, we will obtain your **separate consent** prior to processing, specifying the purpose, method, and types of personal information involved. We will implement strict technical and organizational measures such as encryption and access controls to protect such information and guard against security risks.

If you voluntarily provide us with personal information (especially sensitive personal information) of another individual, you shall ensure that you have obtained prior and sufficient authorization from that individual and shall bear corresponding responsibility arising therefrom.

(2) Circumstances Where Consent is Not Required

Under Chinese law, consent is not required for processing personal information in the following circumstances:

- a. Where it is necessary for the conclusion or performance of a contract to which you are a contracting party;
- b. Where it is necessary for the performance of statutory duties or obligations;
- c. Where it is necessary to respond to public health emergencies or, in emergency situations, to protect the life, health, or property safety of natural persons;
- d. Where personal information is processed within a reasonable scope for purposes such as news reporting and public opinion monitoring carried out in the public interest;

- e. Where personal information that has been disclosed by individuals themselves or has been otherwise lawfully disclosed is processed within a reasonable scope in accordance with legal provisions;
- f. Other circumstances stipulated by laws or administrative regulations.

2. Protection of Minors

We are fully aware of and strictly comply with Chinese regulations concerning the online protection of minors. Our products and services are **not actively directed at** minors under the age of fourteen, and we do not knowingly collect personal information from individuals in this age group. If you are the guardian of a minor, please monitor and manage the minor's online activities to prevent them from providing any personal information to us without your consent.

3. Data Security and Anonymization

We will adopt technical and necessary managerial measures that comply with Chinese laws, regulations, and mandatory national standards to ensure that personal information processing activities are lawful and compliant, and to prevent personal information from unauthorized access, disclosure, alteration, or loss.

Information resulting from the anonymization of personal information in accordance with the law (where specific individuals cannot be identified and the information cannot be restored) **no longer constitutes personal information**. We reserve the right to use such anonymized information for purposes including data analysis, product improvement, and business decision-making without further notice to you.

4. Cross-border Provision of Personal Information

To provide globally standardized services and technical support, and for necessary group-internal management, we may provide your personal information to affiliated parties located outside China, provided that such cross-border transfers comply with China's data export regulatory requirements.

Primary Overseas Recipient:

Name: SGL Carbon GmbH

Address: Werner-von-Siemens-Strasse 18 Meitingen 86405 Germany

Prior to any cross-border transfer, we will, in accordance with Chinese law, take one or more compliance measures which may include concluding the standard contract formulated by the national cyberspace authority with the overseas recipient, conducting a personal information protection impact assessment, and obtaining your separate consent as required by law, to safeguard your rights and interests in your personal information. You may exercise your relevant rights under Chinese law against the overseas recipient via the contact details provided in the Main Policy.

5. Your Personal Information Rights

Under Chinese law, you have the following rights regarding your personal information:

- a. **Right to Know and Consent:** The right to be informed of processing rules and to give separate consent in circumstances such as the processing of sensitive information;
- b. **Right to Access and Copy:** The right to access and copy your personal information held by us;
- c. **Right to Correct and Supplement:** The right to request corrections or supplements if your information is inaccurate or incomplete;



- d. **Right to Deletion:** The right to request deletion of your personal information under statutory circumstances;
- e. **Right to Withdraw Consent:** The right to withdraw your consent at any time for processing based on consent, without affecting the lawfulness of processing conducted prior to the withdrawal;
- f. **Right to Account Cancellation:** The right to request cancellation of your account;
- g. **Right to Refuse Automated Decision-Making:** Where a decision that significantly affects your rights and interests is made solely through automated means, you have the right to request an explanation and to refuse to be subject to a decision made solely through automated decision-making.

You may submit requests to exercise these rights via the contact details provided in the Main Policy([Data Privacy | SGL Carbon](#)). Following verification of your identity, we will respond within the statutory period of **fifteen working days**. For repeated requests exceeding a reasonable limit, we may charge a necessary cost fee in accordance with legal provisions.

Under specific circumstances prescribed by law, we may be unable to comply with your request, such as where the request relates to major public interests including national security and public safety, or where there is sufficient evidence of subjective bad faith or abuse of rights on your part. Where we decide not to comply with a request, we will provide you with the reasons.

6. Contact

If you have any questions, comments, suggestions, or complaints regarding this Addendum or our personal information processing activities, or if you wish to exercise your personal information rights, please contact us via:

Email: brook.zou@sglcarbon.com

Phone: +86 21 6097-6949

Address: No.151, East Huancheng Road, Fengxian 200401 Shanghai/China

We will respond within **fifteen working days** after receiving your request and completing identity verification. In complex circumstances, we will inform you of any extension within the timeframe permitted by law.