**PAIG (China) Personal Data Protection Policy**

PAIG (China) appreciates your visit to our website and your interest in products and services offered herein. Personal data acquired during your visit to official website of PAIG (China) will be used to assess your interest in PAIG (China) and its cars and services. These data will only be used by PAIG (China) and its affiliated companies, and will not be disclosed or resold to other companies or organizations.

PAIG (China) Group (hereinafter referred to “PAIG (China)” or “Us”) provides you with cars, spare parts and other accessories (hereinafter referred to as “Products”) and numerous online and offline services related to the Products, including but not limited to our websites, telematics and other in-vehicle technologies, commodity exhibition exchange and other services (collectively referred to as “Services”). You may be requested to provide your personal data when you contact with us and/or our affiliated companies in terms of our products or services. We pay lots of attention to your personal data protection and personal privacy, and understand that you may care about how your personal data will be used and shared. Therefore, this Personal Data Protection Policy is developed to elaborate how we collect, use, disclose, share and store your personal data.

Please carefully read this Policy. By using our product and/or service, you agree that: you are 18 years old or above and you fully understand and accept all clauses and contents specified herein. If you do not agree with this Policy, you may choose not to use our product and/or service.

**Scope of Personal Data**

“Personal Data” in this Personal Data Protection Policy refer to the information we collect from individuals to identify personal identity, which are divided into personal data that can be used independently (such as name and ID information) and personal data that must be used in combination with other information (such as location and vehicle status). Personal data collected by us may include these two kinds of data at the same time. For personal data that can be used independently, we will collect these data with prior notice and prior consent from you; for personal data that cannot be used independently, we may collect, use, transfer, disclose or dispose of these data for any purpose in the case that they’re not used together with other information.

Personal Data collected from you include but not limited to your name, mailing address, phone number, email address, other contact information, age, birthdate, gender, educational background, occupation, language, post code, area code, personal photo, interest preference, hobby, ID card information, driver license information, credit card information, unique vehicle identifier, geographical location, vehicle status, behavior information, etc.

**Means of Collecting Personal Data**

We will collect and store your personal data through various means:

* The information you provide to us on a voluntary basis when you visit our website or you participate in our website service or other online services (for example, you contact with us through our website to raise questions, make comments or engage in online surveys);
* When you register to obtain our offline services (for example, you purchase our product or service or participate in our car club, etc.);
* When you use our telematics or other in-vehicle technologies;
* When you download or use the applications (such as in-vehicle systems) developed by us or the company designed by us;
* When you follow our social media (such as Weibo and WeChat);
* When you release personal data through platforms available to the public (such as social media websites like BBS, Weibo and WeChat);
* When you provide information to the representatives of our Call Center;
* The information we collect from our dealers, for example, when you engage in test drives, purchase relevant product or service, or repair your car at our dealers;
* The information we collect from your transactions with financial institutions, such as applying for auto loans;
* The information we collect from our business partners and/or service providers (affiliated and non-affiliated companies), for example, we may obtain your personal data from auto show organizers or other third parties to access to potential customers.
* We may also collect your information from other means and add it to our customer database.

**Collecting Data through Cookies**

We will learn about the customers’ usage of our website through Cookies and other tracking technologies. Cookies are a kind of unique identifiers for identifying your device. By doing this, we (including those affiliate sites for which we provide ads) can recommend personalized products and ads to you. By classifying and summarizing of the data collected through Cookies, we provide more targeted and more valuable products and services to different groups of customers. Personal data collected through Cookies cannot be used independently, and you understand and agree that we will use the collected data together with other information. Most of web browsers will automatically enable cookies, but you may reconfigure your browser to disenable Cookies at any time. However, Cookies will allow you to enjoy more premium and personalized services. If you choose to disenable Cookies, it may be impossible for you to fully experience or enjoy all services provided on our website. Thus, it is suggested that you’d better enable Cookies.

**Collecting Data through Surveillance Cameras**

When you enter and stay at any outlet of our dealers or any of our places, we may collect your personal photos through surveillance cameras there. You agree and allow us to collect your personal photos through these surveillance cameras. We only collect, use and process the photos for ant-theft purpose, security monitoring purpose or other purposes specified herein (see details below).

**Collecting Data through Call Center**

In order to improve service quality and follow up your request, we may collect your personal data or make recordings via electronic media means during your call to us through hotline. You understand and agree that we collect your personal data and make recordings during the call.

**Collecting Data through Mobile Devices or In-vehicle Systems**

When you download or use the applications (such as in-vehicle systems) developed by us or our designated company, we may receive the data about your geographical locations, vehicle statuses and your mobile devices (including the unique identifier for your mobile device). These data will be used to determine approximate location of yourself, your device or your vehicle. In this way, we’re able to provide and enhance our positioning service or other personalized services. You hereby understand and agree that we collect the above personal data about geographical locations, vehicle statuses, unique mobile device identifiers, etc.

**Collecting Data through Free WI-FI System**

When you use the free WI-FI at the outlets of our dealers, your personal data may be collected by this free WI-FI system, including your mobile phone number, relevant device ID, geographical location, Internet and mobile Internet browsing records. During our business activities, we may use these data independently or together with other information collected about you, thus providing better personalized services for you. You hereby understand and agree that we collect the above personal data about mobile phone number, relevant device ID, geographical location, browsing records, etc.

**Consequences of Refusing to Provide Personal Data**

You may choose not to provide your personal data. If it is the case, we may not be able to provide you with our products or services, or to respond to your questions about product or service failures. In this case, we will not be liable for any losses you may suffer.

**How We Use Your Personal Data**

We will use the collected data for the following purposes (hereinafter refer to as “Purposes of Collecting Personal Data”):

* Manage our products and services, provide you with our products and services, and communicate with you in time for your better use of our products and services;
* Customize personalized products and services for you (including regional and personalized customizations), so that you may have better experience;
* Support our performance and operation of services, respond to your consultation and request, and deal with your transaction;
* Provide you with aftersales services and support, and receive your feedbacks;
* Inform you of our latest products, services, derivative products and services, upcoming events, lucky draw, competition or promotion activities in a timely manner;
* Use your personal data for data analysis, research and other internal purposes to enhance the quality of our products and services and the communication with our customers, and to solve their problems in time;
* Use your personal data for sending importance notice on product or service safety, such as recalling, market action and other information. Since they are of vital importance to your personal safety, we strongly suggest you not to refuse the receipt of these information;
* Investigate frauds that have occurred or possibly occur, or prevent frauds or other potential illegal activities;
* Process job applications;
* Other purposes agreed by you.

In some cases, in order to provide and perfect our products, services, contents and ads, we may also combine your personal data and non-personal data for analysis and research.

We will not use your personal data against or beyond the above purposes.

**Disclose or Share Your Personal Data to/with Third Parties**

We respect your personal privacy and obey relevant laws and regulations. We promise to keep your personal data collected in strict confidence, and will not sell them to others. We only share your personal data with third parties for the above purposes, or by obeying this Policy or at least by providing the same protection with this Policy. Unless otherwise specified, these third parties do not collect, use, transfer, or dispose of your personal data on behalf of PAIG (China). Hence, PAIG (China) will not be liable for the collection, use, transfer or disposal of your personal data by third parties.

* Our associates and affiliated companies: In order to make sure that we offer services of similar quality to you, we may share your personal data with our associates and affiliated companies;
* Financial institutions, auto insurance companies, used car companies, and extended warranty companies: We will share them your personal data related to vehicle financing, used car assessment and sales, vehicle warranty extension, etc.;
* Business partners: We have cooperated with numerous third parties. In order to promote cooperation and launch or update premium products and services, we may share your personal data with third-party partners.
* Third-party service providers: We hire third-party companies (such as suppliers, service providers, etc.) to provide relevant services to our customers, including but not limited to auto loans, auto insurance, vehicle information, roadside assistance, call visits, sending of letters, emails or SMS, customer information elimination, data analyses, marketing assistance, customer satisfaction survey, response to customers’ enquiries, dealing with customers’ requests, etc. These third parties are only allowed to access, use, dispose of or keep your personal data for performing their obligations or facilitating us to collect your personal data. They are not allowed to use your personal data for any other purposes.
* Call Center: We set up a Call Center to uniformly receive your requests and feedbacks, and to enhance our service quality. In order to provide effective services for you, we may share your personal data with Call Center;
* Business Transfer: For sustainable development of our businesses, we may restructure, merge or sell some of our businesses. When our assets are transferred to third parties dur to the restructuring, merger or selling, all relevant personal data collected by us will also be transferred to these third parties;
* Investigations or Audits: In accordance with applicable laws and regulations, we may be subject to investigations or audits from relevant governmental or regulatory authorities from time to time. During these investigation or audit procedures, if we’re required to disclose your personal data but cannot inform you of such disclosure immediately, you hereby understand and agree that we can disclose your personal data to relevant third parties during these procedures without obtaining your additional consent.
* Others: As requested by other laws and regulations, legal proceedings, court orders, lawsuits and/or public organs and governmental departments, or in consideration of national security, law enforcement and other events of public importance, or for the goal of implementing our clauses and conditions or protecting our business or users, if necessary or appropriate, we may also disclose your personal data to relevant third parties;
* Otherwise agreed by you: When you otherwise agree or give us instructions, we may disclose your personal data to relevant third parties.

**Processing and Storage of Personal Data**

We provide some conveniences for you to ensure your personal data are accurate, complete and updated in time. We will keep your personal data within the required period for achieving the purposes specified herein, unless any applicable law requires or permits to keep these data within a longer period.

It is of great important to maintain accurate and complete personal data. You’re much appreciated to help us update your personal data in time so that they are accurate and complete by sending emails to info@paig.com.cn.

**Options**

We may send marketing information to you via email, telephone, mobile phone or text message (including SMS and MMS), letter or other means. Our goals include but not limited to: informing you of latest information about our products or services, inviting you to participate in our marketing activities, or releasing announcements about our products or services.

If you choose not to receive marketing information from PAIG (China) and its dealers, you may unsubscribe it by following our instructions. Please note that it may take a few days to deal with your unsubscribing request, and you may still receive promotional or marketing information during these days.

**About Minors’ Personal Data**

We will not knowingly collect personal data of minors under 18 years old. If it is found that we have collected personal data of minors under 18 years old without the consent of their guardians, we will take relevant measures as soon as possible to delete such data.
**Third Parties’ Collection of Your Personal Data Via Our Product or Service**

Our products and services may contain the links of third parties’ websites, products and services. Our products or services may also use or provide products or services from third parties, such as telematics. For personal data collected by third parties through our systems, products and services (which may contain location data, contact information, etc.), the use, processing, storage, transfer and destruction of these data must obey the privacy policies of third parties. If we do not grab or collect your personal data during this process, we will not take relevant responsibility, and we wish that you have understood privacy policies of these third parties. But, we will keep your personal data in strict confidence in accordance with the clauses herein if we grab or collect them during this process.

**Updates**

We have the right to revise and update the Policy at any time. If we make significant changes in this Policy, we will immediately release the latest privacy policy on our website http://www.paig.com.cn. Unless otherwise stated, the latest valid personal data protection policy apply to you and all of your personal data.

Please read this Policy thoroughly and carefully. After that, if you continue to provide your personal data or purchase our product or use our service, it means that you have fully understood and accepted all clauses and contents contained herein.