

厦门建发钢铁集团有限公司
信息与隐私保护政策
Xiamen C&D Steel & Iron Group Co., Ltd.
Privacy Policy

1 目的 Purpose

为加强信息安全与隐私保护，规范信息管理工作，维护员工、客户、供应商及其他相关方的合法权益，制定本政策。

This policy is formulated to strengthen information security and privacy protection, standardize information management, and safeguard the legitimate rights and interests of employees, clients, suppliers, and other stakeholders.

2 适用范围 Scope

本政策适用于建发钢铁集团及所属全资、控股公司。

This policy applies to Xiamen C&D Steel & Iron Group Co., Ltd. (hereinafter as “the Group”) and its wholly-owned and holding companies.

3 相关措施 Measures

3.1 本集团遵守《中华人民共和国网络安全法》《中华人民共和国数据安全法》《中华人民共和国个人信息保护法》等相关法律法规，依法开展信息管理工作。

The Group complies with relevant laws and regulations, including the Cybersecurity Law of the People's Republic of China, the Data Security Law of the People's Republic of China, and the Personal Information Protection Law of the People's Republic of China, and conducts information management in accordance with the law.

3.2 本集团在业务开展过程中，按照合法、正当、必要原则收集和使用相关信息。

In the course of its business operations, the Group collects and uses

information in accordance with the principles of lawfulness, legitimacy, and necessity.

- 3.3 本集团加强信息安全管理，采取必要措施保护相关信息安全，防止信息泄露、丢失或被不当使用。

The Group strengthens information security management and adopts necessary measures to protect the security of relevant information and prevent information leakage, loss, or improper use.

- 3.4 未经法律法规允许或相关方授权，本集团不违规泄露、提供或使用相关信息。

Without authorization under applicable laws and regulations or from relevant parties, the Group shall not improperly disclose, provide, or use relevant information.

- 3.5 本集团结合实际情况开展信息安全与隐私保护相关宣传或培训，提升员工合规意识。

The Group carries out information security and privacy protection awareness campaigns or training programs based on actual needs to enhance employees' compliance awareness.

4 **生效 Effective Date**

本政策经本集团管理层审议通过后实施，自发布之日起生效。

This policy has been reviewed and approved by the Group's management.

This policy shall come into effect from the date of its publication.

英文版为中文版政策的翻译件，如与中文版存在不一致的，以中文版内容为准。

The English version serves as a translation copy of the Chinese version of the policy. In case of any inconsistencies between the English and Chinese versions, the Chinese version shall prevail.

厦门建发钢铁集团有限公司
Xiamen C&D Steel & Iron Group Co., Ltd.

2026 年 月 日

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