

Recruiting Privacy Policy 招聘隐私通知

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Thank you very much for your interest in Riot Games.
非常感谢您对拳头游戏的关注。

We attach great importance to protecting your information. This Recruitment Privacy Policy (this “**Policy**”) explains how we collect, process, share, transfer and retain your information related to job application, as well as your statutory rights as a personal information subject.

我们非常重视保护您的信息。本招聘隐私政策(“本政策”)旨在说明我们如何收集、处理、共享、传输与存储您与求职申请相关的信息,以及您作为个人信息主体的法定权利。

Under this Policy, the “**Company**” or “**we**” shall mean the employer of the position which you apply for, namely Riot China (Shanghai) Co., Ltd, or any other subsidiary or branch of Riot Games, Inc. in China, *as the case may be*. “**You**” shall mean the candidate. “**Position**” includes but is not limited to positions where a labor relationship is established with us, and positions where a labor dispatch relationship is established with us, positions where a labor service relationship is established with us, internship positions, and other positions in which you are employed by us or serve us in any way.

在本政策项下,“公司”或“我们”指您申请职位所对应的雇主,即俐奥特(上海)商务咨询有限公司或拳头游戏在中国的任何其他子公司或分支机构(视情况而定)。“您”指求职者。“职位”包括但不限于与我们建立劳动关系的职位,和与我们建立劳务派遣关系的职位、与我们建立劳务关系的职位、实习职位以及其他以任何方式受雇于我们或为我们服务的职位。

With respect to the information about you processed according to this Policy, the Company shall be considered the controller (*i.e.* personal information processor as defined under the *Personal Information Protection Law of the People’s Republic of China*). For the purpose of this Policy, “**China**” or “**mainland China**” solely refers to the mainland of the People’s Republic of China, and does not include Hong Kong, Macao and Taiwan.

就按照本政策处理的有关您的信息而言,公司应被视为控制者(即《中华人民共和国个人信息保护法》项下定义的个人信息处理者)。为本政策之目的,“中国”或“中国大陆”仅指中华人民共和国大陆地区,不包括香港、澳门和台湾。

如果您向我们提供第三人的个人信息,比如您的工作证明人等(如适用),则您的个人信息也包括该等第三人的个人信息。请确认您已充分告知并取得该等第三人的同意和单独同意(如适用)。

If you provide us with the personal information of a third party, such as your employment references (if applicable), then your personal information also includes the personal information of such third party. Please confirm that you have fully informed and obtained the consent and separate consent (if applicable) of such third party.

1. Categories of information that we collect about you

我们收集的您的信息类型

During your job application, we may collect and process the following information about you:

- Your name (in Chinese or other languages), contact information (such as email address or phone number, personal address), gender, citizenship/Hukou status (in order to determine whether we need to apply for a work visa for you or support your application for Hukou transfer), copies of identification card, copies of student identification card, education background (if necessary, we may ask you to provide copies of academic qualification and degree certificates, school grades and performance), work experience (which may include previous positions, job titles, start and end dates, main work responsibilities, salary level, and reasons for leaving, employment references), language and work skills (which may include information or copies of vocational qualification certificates or licenses), referee information and reference letters (if any), external businesses and related information, medical check-up report, game ID;
您的姓名(中文或其他语言)、联络信息(如邮件地址或电话号码、个人地址)、性别、公民身份/户口状态(为了判断是否需要为您办理工作签证或支持您的落户申请)、身份证复印件、学生证复印件、教育背景(如有必要,我们可能会要求您提供学历、学位证书复印件、在校成绩和表现)、就业经历(可能包括过往任职职位、职衔、起止日期、主要工作内容、薪资情况、离职原因、工作证明人)、语言与工作技能(可能包括职业资格证书或执照信息或复印件)、推荐人与推荐信(如有)、外部业务和相关信息、体检报告、游戏ID;
- Information about the current job application and information stated in the employment application, cover letters, CVs or similar documents you voluntarily submit or authorize third party service providers to provide to us;

您主动提交或授权第三方服务提供商向我们提供的应聘申请、求职信、简历或类似文件中的信息；

- Information generated during your written test and interview(s), including but not limited to your image, video or voice information captured by web conferencing tools, CCTV, security cameras, etc. during your written test and interview(s). Where required by the position that you apply for, you may be asked to take relevant tests in very limited circumstances;
在您的笔面试过程中产生的信息,包括但不限于在您参加笔面试过程中由网络会议工具、闭路电视及监控摄像头等收集的您的图像、视频或声音信息;如果您申请的职位有需要,在非常有限的情况下,您可能会被要求参加相关测试;
- We may collect information about you from third parties or public sources as necessary to support the recruitment process. We may conduct background checks through third party service providers or your former employer(s) to collect information about your past education background, work performance, credit and/or criminal record (only to the extent permitted by law). In general, we will not commence the background check procedures until we have issued an offer letter to you;
我们可能根据需要从第三方或公开渠道收集关于您的信息,以支持招聘流程。我们可能通过第三方服务提供商或者您的过往雇主进行背景调查,收集关于您过往的教育背景、工作表现、信用和/或犯罪记录的信息(仅在法律允许的范围内进行)。通常而言,背景调查程序在我们向您出具录用通知书后方始开展;
- Other typical information collected during the application and interview process.
其他典型的申请和面试过程中收集的信息。

We may collect the above information directly from you, or may collect information about you from entities authorized by you (such as third party job search platforms, headhunting agencies, etc.) or from other third parties (such as background check agencies, etc.). Please note that if you submit a job application to us through a third party job search platform, headhunting agency, etc., the privacy policy of such third party job search platform, headhunting agency, etc. shall apply to your provision of personal information to them. This Policy only applies to the Company's collection and processing of your personal information.

我们可能直接向您收集上述信息,也可能从您授权的实体(例如第三方求职平台、猎头机构等)或其他第三方(例如背景调查机构等)收集关于您的信息。请注意:如果您通过第三方求职平台、猎头机构等向我们递交求职申请的,您向其提供个人信息适用该等第三方求职平台、猎头机构等的隐私政策;本政策仅适用于公司对您的个人信息的收集与处理活动。

Among the above categories of information that we process, the following information may be considered sensitive personal information: your identification information (such as copies of identification card and identification card number), your salary level, home address, your image, video or voice information, to the extent of it being considered biometric identification information; your medical check-up report (if applicable); your undisclosed criminal record (if any); your relevant test results (if applicable). In any case, we will make sure that the processing of your sensitive personal information is necessary to achieve the purposes as described in this Policy, and our processing of your sensitive personal information will be equipped with strict security measures and be conducted in a manner of having the least impact on your personal rights and interests.

在我们处理的上述各类信息中,下列信息这些可能会被视为敏感个人信息:您的身份信息(比如身份证复印件和身份证号);您的薪资信息情况;家庭地址;您的图像、视频或声音信息,如果其被认为是生物识别信息;您的体检报告(如适用);您的未公开的犯罪记录(如有);您的相关测试结果(如适用)。在任何情况下,我们均将确保处理您的敏感个人信息是为实现本政策中所述之目的所必要的,并且我们对敏感个人信息的处理将采取严格的安全措施并以对您的个人权益影响最小的方式进行。

Please note that when applying for a position, do not voluntarily provide us with your sensitive personal information, for example, do not include your identification card number, home address, portrait photos belonging to biometric information, and other sensitive personal information in your resume. If we need to collect and process your sensitive personal information, we will inform you separately.

请您注意,在申请职位时,请勿主动向我们提供您的敏感个人信息,比如请勿在您的简历中写入您的身份证号、家庭地址、属于生物识别信息的肖像照等敏感个人信息。如果我们需要收集和您的敏感个人信息,我们会另行告知您。

2. How we use your personal information and the legal basis

我们如何使用您的个人信息及法律依据

To the extent permitted or required under applicable laws, we use your personal information for the following purposes:
我们在适用法律允许或要求的范围内将您的个人信息用于下列目的:

- **Recruitment purposes:** arranging written test and interview(s) for you, evaluating your skills, qualifications and background, judging your suitability and fitness to the position you apply for, and arranging and reimbursing travel expenses for interviews; verifying your information and conducting reference check or background check; making arrangements for your future employment, etc.;
招聘目的:安排您进行笔面试,评估您的技能、资质、背景,判断您与所申请的职位的适格性与适配性,安排并报销面试差旅费用;核实您的信息,进行推荐人调查或背景调查;为您的未来就业作出安排等;
- **Managing and improving our recruitment and hiring process;**
管理和改进我们的招聘和雇佣流程;
- **Complying with legal requirements:** We may disclose your personal information to courts, law enforcement authorities or other government authorities to comply with the requirements under laws and regulations, such as to protect the legitimate interests of you or the Company; to defend against potential or actual litigation; to comply with applicable laws and regulations; to respond to court orders, administrative or judicial proceedings, including but not limited to a subpoena or search warrant; matters related to national security; to perform tasks in the public interest; and
遵守法律要求:我们可能会向法院、执法部门或其他政府机构披露您的个人信息以遵守法律和规章的要求,例如保护您或公司的合法利益;针对潜在的或实际的诉讼进行抗辩;遵守适用的法律、法规;对法院命令、行政程序、或司法程序作出答复,包括但不限于法院传票或搜查令;国家安全相关的事项;为公共利益执行任务;以及
- **Other legitimate purposes:** facilities, security and occupational safety and health management, compliance and risk management, merger and acquisition transactions, restructuring and any other legitimate purposes.
其他合法目的:设施、安保和职业安全与健康、合规与风险管理、并购交易、重组及任何其他合法目的。

We process your personal information based on your consent and/or as necessary for the performance of statutory duties or legal obligations.

我们处理您的个人信息是基于您的同意和/或为履行法定职责或者法定义务所必需的。

3. With whom will we share your personal information

我们与谁共享您的个人信息

To the extent permitted by law, we will share your information with the following third parties **located within or outside of China:**

- **Affiliates:** In order to handle your application and manage our recruitment and hiring process, we may share the personal information provided by you according to this Policy with our affiliates. For the purposes of this Policy, affiliates refer to (1) companies in which we directly or indirectly hold shares, or (2) companies in which we are jointly held shares directly or indirectly by a certain company, or (3) our shareholders and their shareholders, or (4) based on relationships such as joint venture, cooperation, management, companies in which we have control or management rights, companies in which we are jointly controlled or managed by a certain company, or companies that control or manage us.
关联公司:为了处理对您的招聘并管理我们的招聘和雇佣流程,我们可能会与我们的关联公司共享您根据本政策提供的信息。为本政策之目的,关联公司指(1)我们直接或间接持有其股份的公司,或(2)与我们共同被某一家公司直接或间接持有股份的公司,或(3)我们的股东及其股东,或(4)基于联营、合作、管理等关系,我们对其有控制权或管理权的公司,我们共同被某一家公司控制或管理的公司,或者我们被其控制或管理的公司。
- **Third parties:** If you make a job application to us through a third party job search platform or headhunting agency, we will share your information with such third party job search platform or headhunting agency (which may be regarded as the controller with respect to your information). We may also share your information with third party service providers (such as background check companies) to verify your information, conduct reference check or background check, etc.
第三方:如您通过第三方求职平台、猎头机构向我们申请职位,我们会向该等第三方求职平台、猎头机构(针对您的信息,其可能被视为控制者)共享您的信息。我们亦可能会向第三方服务提供商(例如背景调查公司)共享您的信息,以核实您的信息、进行推荐人调查或背景调查等。
- **Courts, law enforcement authorities or other government authorities:** We may disclose your personal information to courts, law enforcement authorities or other government authorities to comply with the requirements of laws and regulations, such as to protect the legitimate interests of you or the Company; to defend against potential or actual litigation; to comply with applicable laws and regulations; to respond to court orders,

administrative or judicial proceedings, including but not limited to a subpoena or search warrant; matters related to national security; to perform tasks in the public interest.

法院、执法部门或其他政府机构:我们可能会向法院、执法部门或其他政府机构披露您的个人信息以遵守法律和规章的要求,例如保护您或公司的合法利益;针对潜在的或实际的诉讼进行抗辩;遵守适用的法律、法规;对法院命令、行政程序、或司法程序作出答复,包括但不限于法院传票或搜查令;国家安全相关的事项;为公共利益执行任务。

- In addition, we may also share your personal information with other entities as required under applicable laws or in the event of a sale or transfer of our business and/or assets.

此外,我们亦可能在适用法律要求的情况下或在我们的业务和/或资产出售或转让的情况下与其他实体共享您的个人信息。

In any case, we will only share your personal information for specific purposes based on the principles of lawfulness, fairness, necessity, and good faith, and only share personal information to the extent necessary to achieve the relevant purposes or fulfil our statutory obligations. Before sharing your personal information (except for sharing with courts, law enforcement authorities or other government authorities), we will enter into data protection or confidentiality terms or agreements with relevant recipients to the extent required under applicable laws.

在任何情况下,我们均仅按照合法、公平、必要和诚实信用的原则并基于特定目的共享您的个人信息,并且我们仅在为达成相关目的或履行我们的法定义务所必要的范围内共享这些个人信息。在共享您的个人信息之前(与法院、执法部门或其他政府机构共享的除外),在适用法律要求的范围内,我们将与其订立信息保护或保密条款或协议。

4. Cross-border transfer of your personal information

您的个人信息的跨境传输

The Company and Riot Games, Inc. and its affiliated companies conduct business globally. In the recruitment process, the Company accepts the global recruitment management of Riot Games, Inc, including but not limited to determining recruitment positions, screening candidates, conducting interviews and evaluations, conducting background checks and arranging onboarding. For this purpose, on the premise of complying with applicable legal requirements and providing adequate security guarantees, the Company will transfer some of your personal information to Riot Games, Inc. outside PRC through the Company's internal office system or other reasonable means. The scope of your personal information that the Company cross-border transferred is the personal information described in Section 1 of this Policy, but does not include the sensitive personal information therein. If you wish to know more about the cross-border transfer of your personal information or wish to exercise your relevant rights in accordance with the law, you can get in touch with Riot Games, Inc. the contact detail is: dpo@riotgames.com.

公司和Riot Games, Inc.及其关联公司在全球范围内开展业务。公司在招聘工作中接受Riot Games, Inc.全球化的招聘管理,包括但不限于招聘职位确定,求职者筛选、面试和评估,背景调查和安排入职等方面。为此,公司会在遵守适用的法律要求并提供充分安全保障的前提下,通过公司内部办公系统或其他合理方式,将您的部分个人信息传输至中国境外的Riot Games, Inc.。公司跨境传输的您的个人信息范围为本政策第1节中所述的个人信息,但不包括其中的敏感个人信息。如您希望了解更多有关您个人信息跨境提供的情况或者希望依法行使您的相关权利,您可以与Riot Games, Inc取得联系,联系方式为:dpo@riotgames.com。

5. Retention period for your personal information

我们保存您的个人信息的期限

Unless otherwise permitted or required by applicable laws or regulatory requirements, we only retain your personal information for the shortest period of time necessary to fulfil the purposes for which it was collected.

除非适用法律或监管要求另有允许或要求,我们仅在为了实现收集个人信息的目的所需的最短期限内保存您的个人信息。

6. Security

安全

We maintain appropriate technical and organizational measures to protect against unauthorized or unlawful processing of personal information and/or against accidental loss, alteration, illegal disclosure, access, or accidental or unlawful destruction of or damage to personal information.

我们采取适当的技术及组织措施,以防止个人信息遭到未经授权的或非法的处理,及/或防止个人信息发生意外的灭失、篡改、非法披露或访问,或者遭到意外或非法的毁损或损害。

7. **Your statutory rights** 您的法定权利

Under the conditions set out under applicable laws and this Policy, you have the following rights:
在适用法律和本政策规定的条件下, 您拥有下列权利:

- **Right of access and copy:** You have the right to access and copy the Personal Information concerning you.
查阅复制权: 您有权访问、复制与您相关的个人信息。
- **Right to rectification:** You have the right to request the Company to rectify inaccurate Personal Information concerning you or supplement incomplete Personal Information.
更正补充权: 您有权要求公司更正与您相关的不准确个人信息或对个人信息加以补充。
- **Right to erasure:** You have the right to ask us to erase your Personal Information in accordance with law in certain circumstances specified under the PRC law. However, your right to erasure will not affect the lawfulness of our Processing prior to the erasure request or Processing based on other legal bases.
删除权: 在中国法律规定的某些特定情形下, 您有权依法要求我们删除您的个人信息。但是, 您行使删除权不会影响公司此前已开展的或基于其他法律依据开展的处理活动的合法性。
- **Right to explanation:** You have the right to require us to further explain our rules of Processing of Personal Information which is unclear or not addressed in this Policy.
解释说明权: 您有权要求我们就本政策中不明确或未提及的我们的个人信息处理规则向您进一步解释说明。
- **Right to transfer:** You have the right to request us to transfer your Personal Information that the Company holds about you to another controller to the extent the conditions stipulated by the applicable law are fulfilled.
可转移权: 在符合适用法律规定的条件的前提下, 您有权要求将您在公司处的个人信息转移至其他控制者。
- **Right to withdraw your consent:** If you have given your consent regarding certain types of Processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the Processing prior to the consent withdrawal or Processing based on other legal bases.
撤回同意权: 如果您已就特定类型的处理活动给予您的同意, 您可以随时撤回该同意, 撤回同意只对于之后的处理活动有效。您撤回同意不会影响此前已开展的或基于其他法律依据开展的处理活动的合法性。
- **Other rights permitted by the applicable laws.**
用法律允许的其他权利。

8. **Contact us** 联系我们

To exercise the rights in Section 7 or raise any additional questions regarding the Company's personal information practices, you may contact us by email to dpo@riotgames.com. You also have the right to raise any complaint related to data protection with the relevant supervisory data protection authority.

如您欲行使第7节的相关权利或针对公司处理个人信息的其他事宜提出问询, 您可以通过发送电子邮件至 dpo@riotgames.com 联系我们。您亦有权向有关信息保护监管机构提出任何与信息保护相关的投诉。

9. **Update to this Policy** 本政策的更新

We reserve the right to modify this Policy from time to time. Any updated version will be published on this page. For major changes to this Policy, we may provide notice in a more prominent way and obtain your consent to the updated Policy where required by applicable laws.

我们保留不时修改本政策的权利。任何更新后的版本将在本页面公示。对于本隐私通知重大变更, 我们可能会提供更显著的通知, 并在适用法律有要求的情况下, 征得您对更新后的政策的同意。

Option A Suggested consent wording by clicking the "I Agree" button:

建议勾选同意话术:

By ticking the box and clicking the "I Agree" button, I expressly and voluntarily consent to the following:

通过在方框中打勾并点击“我同意”按键, 本人明确自愿同意以下内容:

- I have read the Recruitment Privacy Policy carefully and consent to the Company's collection and processing of my personal information according to its provisions.
我已仔细阅读《招聘隐私政策》, 并同意公司按照其规定收集和处理我的个人信息。
- I expressly, specifically, and voluntarily consent to the Company's processing of my sensitive personal information according to Section 1 thereof.
我知悉并同意公司根据《招聘隐私政策》第1节的规定处理本人的敏感个人信息。
- I expressly, specifically, and voluntarily consent to the Company's transfer of my personal information to relevant recipients according to Section 3 thereof.
我知悉并同意公司根据《招聘隐私政策》第3节的规定将我的个人信息传输至该政策项下所述相关接收方。
- I expressly, specifically, and voluntarily consent to the Company's cross-border transfer of my personal information to Riot Games Inc. located outside PRC according to Section 4 thereof.
我知悉并同意公司根据《招聘隐私政策》第4节的规定将我的个人信息跨境传输至位于中国境外的Riot Games Inc.
- I hereby confirm that if I provide the personal information of a third party to the Company, I have already fully explained the matter to the third party and have obtained the consent and separate consent of the third party for the Company to process his or her personal information in accordance with the purposes and methods as disclosed under the Recruitment Privacy Policy.
本人确认, 如本人向公司提供第三人个人信息的, 本人已向该第三人进行充分说明, 并已取得该第三人对公司根据《招聘隐私政策》中所述的目的和方式处理其个人信息的同意和单独同意。

Option B Suggested wording for acknowledging receipt of application by email:

建议邮件回复收悉申请的话术

Thank you very much for your interest in Riot Games. Your job application has been duly received.

非常感谢您对拳头游戏的兴趣。您的求职申请已收悉。

Please read the Recruitment Privacy Policy carefully and, by clicking the "I Agree" button, consent to our collection and processing of your personal information (which may include sensitive personal information) according to its provisions, and consent to our transfer of your personal information to relevant recipients as disclosed under such policy according to Section 3 thereof, as well as consent to our cross-border transfer of your personal information to Riot Games Inc. located outside PRC according to Section 4 thereof. If you are unwilling to give the above consent, you can inform us by replying to this email at any time and we will stop processing your application and delete your personal information. If you do not expressly inform us of your refusal of consent within three days, you will be deemed as having given the relevant consent.

请您仔细阅读我们的《招聘隐私政策》, 并通过点击“我同意”按键、同意我们按照其规定收集和处理您的个人信息(可能含敏感个人信息), 且同意我们根据该政策第3节的规定将您的个人信息传输至该政策项下所述的相关接收方, 以及同意我们根据该政策第4节的规定将您的个人信息跨境传输至位于中国境外的Riot Games Inc.。如您不愿作出上述同意, 您可随时回复本邮件告知我们, 我们会停止受理您的申请并删除您的个人信息。如您在三日内未作出拒绝同意的明确意思表示, 您会被认为已作出相关同意。

Our talent recruitment department will review your application as soon as possible and may contact you afterwards.

我们的人才招聘部门会尽快审阅您的申请, 并后续与您联络。