Alibaba Cloud International Website Privacy Policy

This Privacy Policy applies to the access and use of the Alibaba Cloud International Website currently located at www.alibabacloud.comand the Alibaba Cloud International Marketplace Platform currently located at https://marketplace.alibabacloud.com/(the "**International Marketplace**") (collectively the "**Alibaba Cloud Platform**"), and the use by registered users of the Alibaba Cloud Platform of Alibaba Cloud products and services (the "**Cloud Services**") provided by the Alibaba Cloud entity listed in Clause 2 of the Terms of Use(referred to as "**we**", "**our**" or "**Alibaba Cloud**" hereinafter). Terms not defined in this Privacy Policy shall have the same meaning as in the Terms of Use of the Alibaba Cloud Platform.

This Privacy Policy sets out how we collect, use, transfer, retain, secure and disclose your personal data and/or personal data about your customers or end users that you provide to us pursuant to your use of the Alibaba Cloud Platform and/or our Cloud Services, as well as other terms relating to data location. It also describes your choices regarding use, access and correction of your personal data.

Many of our Cloud Services offered through the Alibaba Cloud Platform are intended for use by business organisations. If you use your organisation's email address to register an account and purchase or use our Cloud Services, the owner of the domain associated with your organisation's email address, and/or your organisation, may monitor or control your account with the Alibaba Cloud Platform and access, process, and/or control your personal data, as well as the contents of your communications and files. Your organisation's use of our Cloud Services may be subject to your organisation's own rules or policies, and you shall direct all privacy enquiries relating to such rules or policies to your organisation's administrators. We are not responsible for the privacy or security practices of your organisation.

Cloud Services may be used by our customers (i.e. registered users of Alibaba Cloud) to develop or host their own services and products for the customer's end users. Any information collected or handled by Alibaba Cloud in such circumstances is processed on behalf of our customer who controls the collection and use of such information. We do not have a direct relationship with the end users of our customers. Where this is the case, end users should direct all privacy enquiries, such as any requests to access, correct, amend or delete personal data, to the Alibaba Cloud customer providing their services or products. We are not responsible for the privacy or security practices of our customers.

The Alibaba Cloud Platform and the Cloud Services are not intended for minors (persons under the age of 18). Minors must not use the Alibaba Cloud Platform and the Cloud Services for any purpose.

A. COLLECTION OF PERSONAL DATA

1. If you are (i) an individual or (ii) a representative of a business organisation at the time you register to become a user of the Alibaba Cloud Platform and/or purchase Cloud Services, you may be asked to complete registration forms which require you to provide information such as your email address, mobile number, country, preferred language, name, contact address, and screen nickname. You may also provide to us additional optional contact information in your account profile, such as email address for sub-accounts, and additional contact phone numbers.

2. We record details of your activities (including any purchase or use of our product offerings and services) when you use the Alibaba Cloud Platform and/or certain Cloud Services for legal and/or business purposes. If you make purchases or otherwise transact online through the Alibaba Cloud Platform, we also collect information related to such transactions including, but not limited to, the types and specifications of the Cloud Services, pricing information, and any trade dispute/complaint records.

3. When you contact our customer support, sales or other departments, we may record the communications for security and customer services purposes and collect additional information to verify your identity.

4. If you make online purchases for our Cloud Services through the Alibaba Cloud Platform, you may be required to provide information related to your payment instrument (such as credit cards), including information about your payment instrument organisation, your payment instrument number, the security code, and the expiration date of your payment instrument, directly to our payment service provider.

5. Please note that certain categories of data are necessary for us to provide the Cloud Services, such as user name, address, phone number, and email address. These categories will be specified at the time of collection. In the event that you do not provide any or sufficient data marked as mandatory, we may not be able to complete the registration process or provide you with our Cloud Services.

6. We also record records of users' buying and browsing activities on the Alibaba Cloud Platform, including but not limited to Internet Protocol ("IP") addresses, browsing patterns and purchasing patterns. In addition, we automatically gather statistical information about our Alibaba Cloud Platform and visitors to our Alibaba Cloud Platform including, but not limited to, IP addresses, browser software, operating system, software and hardware attributes, pages viewed, number of sessions and unique visitors.

7. When you elect to use servers located in the PRC (excluding Hong Kong (China), Macau (China) and Taiwan (China)) for the Cloud Services, we collect your photo ID (passport, driver's license or identification document, depending on your location; or, where you are a corporate customer, corporate registration documents) to ensure that your account is legally verified in accordance with local law. We may also use the photo ID information collected to carry out risk control, fraud prevention and compliance procedures. For example, we may collect payment-related information from third parties and combine it with information we collect about you for the purpose of fraud prevention and risk control.

B. PURPOSES FOR THE COLLECTION, RETENTION, USE, DISCLOSURE AND TRANSFER OF PERSONAL DATA

We collect, retain, use and disclose personal data for the following purposes:

1. processing your registration as a user, providing you with a user ID for our Alibaba Cloud Platform and maintaining and managing your registration;

2. providing you with customer service and responding to your queries, feedback, claims or disputes;

3. providing the Cloud Services to you and/or your end users;

4. processing your purchases and/or subscriptions on the International Marketplace;

5. personalizing our communication with you based on your order history, and performing research or statistical analysis in order to improve our product offerings and services;

6. publishing any information you voluntarily submit (which may include, but is not limited to, a photograph or other personal data you provide) to our Alibaba Cloud Platform to be published on our Alibaba Cloud Platform through the publishing tools (such as our discussion forums);

7. to comply with applicable law, legal process or lawful government request, or in respect of any claims or potential claims brought against us or our parent companies, shareholders, subsidiaries and affiliates;

8. performing risk control, legal compliance and sanctions screening; and

9. performing screening and checks for unlawful, fraudulent, deceptive or malicious activities.

Subject to obtaining your specific consent (or where otherwise permitted by applicable law in your jurisdiction), we may use your name, phone number, residential address, email address and fax number (which may incorporate personal data) to provide notices, surveys, product alerts, related communications and other marketing and promotional materials to you relating to goods and services offered by us on our Alibaba Cloud Platform.

Legal Basis for Processing for Users from European Economic Area ("EEA") and the United Kingdom ("UK")

Our legal basis to process personal data for EEA and UK Users includes processing that is: necessary for the performance of the contract between you and Alibaba Cloud (for example, to provide you with the Cloud Services you request and to identify and authenticate you so you may use the website or Cloud Services); necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement); necessary for our legitimate interests (for example, to manage our relationship with you and to improve our Services); **and based on your consent (for example, to communicate with you about our products and services and provide you with marketing information), which may subsequently be withdrawn at any time without affecting the lawfulness of processing based on consent before its withdrawal. You may withdraw any consent that you have provided by clicking** here.

C. DISCLOSURE OF PERSONAL DATA

1. We may disclose your personal data to third party service providers engaged by us to assist with providing you with our services (including partners providing customer services to you, contacting you regarding promotions products and services, performing risk control, fraud prevention and legal compliance procedures, and conducting payment processing services) (the "Third Party Service Providers"). These Third Party Service Providers may be located in Singapore or outside of Singapore, and are engaged under terms compliant with applicable data protection laws and/or appropriate duties of confidentiality to us and are only permitted to use your personal data in connection with the purposes specified in Section B above, and not for their own purposes. These Third-Party Service Providers may further contract some components of the services they provide to us to other service providers. These other service providers may also be located in Singapore or outside of Singapore, and are under a duty of confidentiality to our Third Party Service Providers and are only permitted to use your personal data in connection with the purposes specified in Section B above, and not for their own purposes.

2. The International Marketplace enables you to purchase or subscribe to products and services ("**Marketplace Products**") from companies other than Alibaba Cloud ("**Third Party Vendors**"), and should you purchase or subscribe to Marketplace Products offered by a Third Party Vendor, we may provide such Third Party Vendor with your personal data for the purposes of processing your purchase and/or subscriptions on the International Marketplace. Other than such personal data disclosed by Alibaba Cloud to the Third Party Vendor, in some cases you may be required to submit personal data to Third Party Vendors to use such Marketplace Products. This Privacy Policy does not apply to such collection, use or disclosure of personal data by Third Party Vendors. The privacy policies of Third Party Vendors may differ from ours, and we have no control over the information that you submit to those Third Party Vendors. You should read the relevant privacy policies for those Third Party Vendors before providing your information to such Third Party Vendors.

3. We may share your personal data with affiliated companies in the Alibaba Group and/or their designated Service Providers, for the purposes specified at Section B above. We have appropriate agreements with our affiliated companies in the Alibaba Group for the sharing of your personal data and/or outsourcing of the processing of your personal data to affiliated companies. The designated Service Providers (and their sub-processors, if any) of our affiliates in the Alibaba Group will be engaged under terms compliant with applicable laws and under appropriate duties of confidentiality and will only be permitted to use your personal data in connection with the purposes specified in Section B of the Privacy Policy.

4. We may provide aggregated or anonymized data to third parties, but when we do so, the information we share is in a de-identified format that does not personally identify you.

5. We have established and will establish relationships with other parties and websites to offer you the benefit of their products and services. We offer you access to these other parties and their websites either through the use of hyperlinks to these sites from our Alibaba Cloud Platform or through offering "co-branded" sites in which both we and other parties share the same uniform resource locator, domain name or pages within a domain name on the Internet. In some cases you may be required to submit personal data to register or apply for products or services provided by such third parties or co-branded partners. This Privacy Policy does not apply to these third party sites or co-branded sites. The privacy policies of those other parties may differ from ours, and we have no control over the information that you submit to those third parties. You should read the relevant privacy policy for those third party sites and co-branded sites before responding to any offers, products or services advertised by those parties.

6. Our website offers publicly accessible community forums. Any information you provide in these areas may be accessed, read, collected, and used by others anywhere in the world. To request removal of your personal data from our community forums, contact us at DPO_Intl@alibabacloud.com.

D. TRANSFER OF PERSONAL DATA

A s part of providing you with the Cloud Services, we may need to transfer your personal data from your jurisdiction to an overseas jurisdiction. Recipients of the data in these jurisdictions may be subject to data privacy laws less protective or not equivalent to those in your own jurisdiction. Such overseas transfer or processing of your personal data may be necessary to process and administer your customer account and to provide the Cloud Services (including providing customer services to you, contacting you regarding promotions, products and services, performing risk control, fraud prevention and legal compliance procedures, and conducting payment processing services). If you are located in the EEA or the UK, please refer to the EEA and UK Addendum at the end of this Policy for our commitment with regard to transferring your data to another jurisdiction.

• EU-U.S. Data Privacy Framework with UK Extension and Swiss-U.S. Data Privacy Framework

Alibaba Cloud US LLC and Alibaba Cloud LLC comply with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Alibaba Cloud US LLC and Alibaba Cloud LLC have certified to the U.S. Department of Commerce that we adhere to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) under the UK Extension to the EU-U.S. DPF. Alibaba Cloud US LLC and Alibaba Cloud LLC have certified to the U.S. Department of Commerce that we adhere to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern.

We are committed to subjecting all personal data received from European Union (EU) member countries, the United Kingdom and Switzerland, respectively, in reliance on each Data Privacy Framework, to the Framework's applicable Principles. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit https://www.dataprivacyframework.gov/.

Alibaba Cloud US LLC and Alibaba Cloud LLC remain responsible and liable under the EU-U.S. DPF Principles, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF Principles for the processing of personal data we receive, including if third-party agents we engage to process the personal data on our behalf do so in a manner inconsistent with the Framework's applicable Principles, unless Alibaba Cloud US LLC or Alibaba Cloud LLC prove not responsible for the event giving rise to the damage. Alibaba Cloud US LLC and Alibaba Cloud LLC comply with the DPF Principles for all onward transfers of personal data from the EU, the United Kingdom and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the DPF Frameworks, Alibaba Cloud US LLC and Alibaba Cloud LLC are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission (FTC). In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Alibaba Cloud US LLC and Alibaba Cloud LLC commit to resolve DPF Principles-related complaints about our collection and use of your personal information. EU, UK, and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact Alibaba Cloud US LLC and Alibaba Cloud LLC at: DPO_Intl@alibabacloud.com. Alibaba Cloud US LLC and Alibaba Cloud LLC commit to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to TRUSTe, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit https://feedback-form.truste.com/watchdog/request for more information or to file a complaint. These dispute resolution services are provided at no cost to you.

For complaints regarding DPF compliance not resolved by any of the other DPF mechanisms, you have the possibility, under certain conditions, to invoke binding arbitration. Further information can be found on the official DPF website.

E. SECURITY MEASURES

We use commercially reasonable endeavors to protect the personal data that you provide to us. We also employ several security techniques, including but not limited to the use of industry-standard Secure Socket Layer (SSL) encryption for transmission of personal data in registration information and payment information and the adoption of identity, credential and access management measures for transmission of such personal data to prevent security breaches and unauthorized access of personal data. We limit access to your personal data and other data to people who need access to such data for their work.

Nevertheless, no data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we try to protect your personal data, we cannot guarantee the security of any personal data you transmit to us and you do so at your own risk. We cannot and do not guarantee security in connection with your use of the Alibaba Cloud Platform and our Cloud Services.

We retain your personal data as long as you have an account with us, as needed to provide services or products to you, to resolve disputes, to serve the purpose of research and statistical analysis or as required or permitted by applicable laws, such as tax and accounting laws.

F. PERIOD OF RETENTION AND PROCESSING OF PERSONAL DATA

We retain your personal data for the purposes described in this Privacy Policy where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). In certain circumstances, we will need to keep your personal data for legal reasons after our relationship has ended. The specific retention periods depend on the nature of the personal data and why it is collected and processed, and the nature of the legal requirement.

When we have no ongoing legitimate business need or legal reason to process your personal data, we will either delete or anonymize it or, if this is not possible, then we will securely store your personal data and isolate it from any further processing until deletion is possible.

G. PROCESS AND METHOD OF DESTRUCTION OF PERSONAL DATA

Alibaba Cloud will delete your personal data as described in Section F of this Privacy Policy. When deleting personal data, we will take standard commercially reasonable measures to make the personal data practically irrecoverable or irreproducible. The specific manner of deletion will depend on the data being deleted, how the data was collected and stored, and your interactions with us. Electronic documents or files containing personal data will be deleted using a technical method that makes recovery or retrieval of such information practically impossible or renders the data no longer personally identifiable. Non-electronic documents or files containing personal data will be shredded, incinerated, or both.

H. RIGHT TO ACCESS/CORRECT PERSONAL DATA; CONTACTING US

You have the right to request access to your personal data held by us (or on our behalf) and to request correction or deletion of such personal data. Additionally, upon request, we will provide you with information about whether we hold your personal data. You may contact us at DPO_Intl@alibabacloud.com to request access, correction or deletion of your personal data. We will respond to your request within a reasonable timeframe. In case a request is made to revise or delete certain personal information that is specified as being required to be collected under other laws and regulations, such personal information cannot be deleted. You may also have supplemental rights under applicable law in relation to your personal data. For example, if you are an EEA or UK user, you have the right to object to or request the restriction of processing of your personal data, and to request portability of your data by contacting us at DPO_Intl@alibabacloud.com or submit your request by clicking here.

In cases where we act as a processor, we have no direct relationship with the individuals whose personal data we process. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to Alibaba Cloud's client (the data controller).

You may receive e-newsletters from us. If you would like to discontinue receiving this information, you may update your email preferences by using the "Unsubscribe" link found in emails we send to you or at your member profile.

We do not knowingly collect personal data of minors (persons under the age of 18). If a minor has provided us with personal data, the parent or guardian may contact us on the minor's behalf to request that we cease any further collection, use and/or disclosure of the personal data and delete the personal data we may hold relating to the relevant minor.

If you have any questions regarding this Privacy Policy or if you wish to exercise any of these or other rights you may have under applicable law in relation to your personal data, you may send your request in writing to the following contact and address:

• **European Economic Area (EEA)**

For individuals in the EEA, and/or in relation to processing conducted by or on behalf of Alibaba (Netherlands) B.V., please contact:

Attention: Data Protection Officer

c/o Herengracht 448, 1017 CA Amsterdam, the Netherlands

E-mail address: DPO_Intl@alibabacloud.com

For individuals in the EEA, Alibaba (Netherlands) B.V. is the relevant "data controller" for the purposes of EEA data protection law.

• **United Kingdom and Europe (outside the EEA)**

For individuals in the UK or in Europe (but outside the EEA), and/or in relation to processing conducted by or on behalf of Alibaba.com (Europe) Limited, please contact:

Attention: Data Protection Officer

c/o Alibaba.com (Europe) Limited, 8th floor, Millbank Tower, 21-24 Millbank, London SW1P 4QP, United Kingdom

E-mail address: DPO_Intl@alibabacloud.com

For individuals in the UK or Europe (but outside the EEA), Alibaba.com (Europe) Limited is the relevant "data controller".

Outside the EEA, UK and Europe

For individuals in Malaysia, and/or in relation to processing conducted by or on behalf of Alibaba Cloud (Malaysia) SDN.BHD., please contact:

Attention: Data Protection Officer

c/o 31/F, Tower One, Times Square, 1 Matheson Street, Causeway Bay, Hong Kong.

E-mail address: DPO_Intl@alibabacloud.com

For individuals in Malaysia, Alibaba Cloud (Malaysia) SDN.BHD. is the relevant "data controller".

In all other cases, please contact:

Attention: Data Protection Officer/Alibaba Cloud (Singapore) Private Limited, c/o 51 Bras Basah Road, #03-06 Lazada One, Singapore 189554.

E-mail address: DPO_Intl@alibabacloud.com

In addition to the addresses listed above, if you have a privacy or data use concern which has not been addressed to your satisfaction, you may contact our third party dispute resolution provider (free of charge) here.

This Privacy Policy also contains links to third party websites. If you experience difficulties using these links, please contact us at DPO_Intl@alibabacloud.com, or click here to submit your request:

I. COOKIES

We and our partners use “cookies” and/or similar technologies (collectively "**Cookies**"), to collect and use personal data about including to enable basic features of our site to function, to provide enhanced and personalised functionality, to conduct analytics, and deliver personalised advertisements. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Alibaba Cloud International Website Cookies Notice.

J. CHANGES TO THIS PRIVACY POLICY

Any changes to this Privacy Policy will be communicated by us posting an amended Privacy Policy on our Alibaba Cloud Platform. The new Privacy Policy will become immediately effective once posted on the Alibaba Cloud Platform or at a date specified by Alibaba Cloud. We may also in our discretion provide notice to you of any changes to the Privacy Policy.

If we make any material changes of this Privacy Policy, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. Any information and/or personal data we hold about you (as described in this Privacy Policy and whether or not collected prior to or after the amended and restated Policy comes into effect) will be governed by the latest version of our Privacy Policy.

Should we need to use your personal data for a purpose that is materially different from that disclosed in our Privacy Policy, or disclose it to a non-agent third party in a manner not specified in our Privacy Policy, Alibaba Cloud US LLC and Alibaba Cloud LLC will provide you with the opportunity to opt out of such uses or disclosures of personal data.

We strongly encourage you to visit the Alibaba Cloud Platform from time to time to review the Privacy Policy. Your continued use of the Alibaba Cloud Platform and/or the Cloud Services signifies your acceptance of the changes to the Privacy Policy.

AUSTRALIA ADDENDUM

If you are located in Australia, you acknowledge that Alibaba Cloud (Singapore) Private Limited is bound by the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Cth) (Privacy Act). If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal data, please contact our DPO at the address for “Outside the EEA” set forth in Section H above, who will review your complaint and respond within a reasonable period. If you are dissatisfied with the handling of your complaint or concern, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner: GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

CALIFORNIA ADDENDUM

These additional disclosures are required by the California Consumer Privacy Act (“CCPA”). This California Addendum does not apply to personal data that is not processed by us a business pursuant to the CCPA, such as any personal data processed by Alibaba Cloud on behalf of its customers.

During the preceding 12 months, Alibaba Cloud has collected, used, and/or disclosed the categories of personal data described in Section A of our Privacy Policy. For example, depending on the Alibaba Cloud Platform and/or our Cloud Services you use, this may include your identifiers (e.g., IP addresses and email addresses), commercial information, audio information (e.g., recordings of customer support communications), and Internet and other electronic activity information. This may also include inferences we draw from the other information we collect.

We do not sell information, although we do share personal data in the ways described in our Privacy Policy.

We provide you certain rights described in Section H above in accordance with state law. We will not charge you different prices or provide different quality of services unless those differences are related to your information or otherwise permitted by law. Please submit your request by sending us an email to DPO_Intl@alibabacloud.com. Once we receive your request, we may verify it by requesting information sufficient to confirm your identity, including by asking you to verify information about your use of the Alibaba Cloud Platform and/or our Cloud Services. If you would like to use an agent registered with the California Secretary of State to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf.

EEA and UK ADDENDUM

This section of the Privacy Policy applies only if you are located in the EEA or the UK or Europe (but outside the EEA) and supplements the information in this Privacy Policy.

Alibaba Cloud is the controller of personal data only when it collects personal data and determines the purposes and means of processing that personal data. For example, when customers of our Cloud Services register an account with us or provide contact information in order to receive customer support, we are the controller of that data. When customers host their own services on our Cloud Services, we act as a data processor with respect to that data.

Our business may require us to transfer your personal data to countries outside of the EEA or the UK, including to countries that may not provide the same level of data protection as your home country, such as the United States, Singapore and China. We strive to take appropriate steps to ensure that an adequate level of protection is provided for your personal data. Per GDPRArt.46, we implement measures such as entering into written agreements including standard contractual clauses and other data protection agreements with recipients. A copy of those clauses can be obtained by contacting us at DPO_Intl@alibabacloud.com.

You may lodge a complaint with a supervisory authority if you consider that our processing of your personal data infringes applicable law.

THE PHILIPPINES ADDENDUM

This is an addendum to the Alibaba Cloud International Website Privacy Policy (the “Privacy Policy”) in relation to Philippine data subjects (this “Philippines Addendum”) and should be read in conjunction with the Privacy Policy.

Location and Storage of Personal Data

Your personal data will be stored in Singapore. Your personal data may however be transferred to or accessed by our officers, employees, support staff, agents, Third Party Service Providers (and their sub-processors, if any), and affiliate companies in the Alibaba Group (and their designated Service Providers and the latter’s sub-processors, if any), which may be located in several other jurisdictions.

Rights of Data Subjects

In addition to the above-discussed rights as provided under Part F of the Privacy Policy, You have the right to be informed of the processing of your personal data, the right to object to the processing of your personal data (in which case, you may have to cease using our services), and the right to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained, or unauthorized use of your personal data, and the right to obtain a copy of your personal data, which has been stored in electronic or structured format. If you believe that your right as a data subject has been violated, you may also file a complaint with the Philippine National Privacy Commission.

Contact Information of Data Protection Officer

If you have any questions regarding this Privacy Policy or want to exercise any of your rights as provided in this Privacy Policy or pursuant to Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012, and its implementing rules and regulations, any relevant issuance of the Philippine National Privacy Commission, and other privacy laws and regulations in the Philippines (as may be amended from time to time), you may reach us through our Data Protection Officer whose contact details are provided below:

Attention: DPO

Address: Alibaba Cloud (Singapore) Private Limited, Legal Department

c/o 51 Bras Basah Road, #03-06 Lazada One, Singapore 189554

E-mail address: DPO_Intl@alibabacloud.com

SOUTH KOREA ADDENDUM

This is an addendum to the Alibaba Cloud International Website Privacy Policy (the “Privacy Policy”) in relation to South Korean data subjects (this “Korea Addendum”) and should be read in conjunction with the Privacy Policy.

We do not knowingly collect personal information from children in South Korea who are under the age of 14. If you are under the age of 14, please do not sign up to use our Alibaba Cloud Platform and the Cloud Services or provide any information about yourself through the Alibaba Cloud Platform and the Cloud Services.

Collection of Personal Data

1. Items of personal information processed with the consent of the data subject

We process the following types of personal information with your consent pursuant to Articles 15(1)1, 24(1)1 and 22(1) of the Personal Information Protection Act (“PIPA”) of Korea.

Classification	Purpose of Collection	Items to be Collected	Retention Period

When you register to become a user of the Alibaba Cloud Platform (Mandatory Consent)	• Processing your registration as a user, providing you with a user ID for our Alibaba Cloud Platform and maintaining and managing your registration • Providing you with customer service and responding to your queries, feedback, claims or disputes • Publishing any information you voluntarily submit to our Alibaba Cloud Platform to be published on our Alibaba Cloud Platform through the publishing tools (such as our discussion forums) • To comply with applicable law, legal process or lawful government request, or in respect of any claims or potential claims brought against us or our parent companies, shareholders, subsidiaries and affiliates • Performing risk control, legal compliance and sanctions screening • Performing screening and checks for unlawful, fraudulent, deceptive or malicious activities	• Email address, mobile number, country, preferred language, name, contact address, and screen nickname • Communications with customer support, sales or other departments • Internet Protocol ("IP") addresses, browsing patterns and purchasing patterns, browser software, operating system, software and hardware attributes, pages viewed, number of sessions and unique visitors	Unless we are obligated to preserve your personal information by applicable laws and regulations, we will retain and use your personal information until your Alibaba Cloud account is deregistered.
When you purchase cloud services via the Alibaba Cloud Platform (Mandatory Consent)	• Processing your purchases and/or subscriptions for Cloud Services • Processing your purchases and/or subscriptions on the International Marketplace • Providing the Cloud Services to you and/or your end users • Personalizing our communication with you based on your order history, and performing research or statistical analysis in order to improve our product offerings and services • To comply with applicable law, legal process or lawful government request • Performing risk control, legal compliance and sanctions screening • Performing screening and checks for unlawful, fraudulent, deceptive or malicious activities	• Email address, mobile number, country, preferred language, name, contact address, and screen nickname • Information related to your payment method, such as the payment instrument organization, payment instrument number, the security code, expiration date of payment instrument • Details of activities (including any purchase or use of product offerings and services), types and specifications of the Cloud Services, pricing information, and any trade dispute/complaint records • Payment-related information such as verification information	Unless we are obligated to preserve your personal information by applicable laws and regulations, we will retain and use your personal information until your Alibaba Cloud account is deregistered.
Account Verification and Risk Control (Mandatory Consent)	• When you elect to use servers located in the PRC (excluding Hong Kong (China), Macau (China) and Taiwan (China)) for the Cloud Services, we use your photo ID (or, where you are a corporate customer, corporate documentation) to ensure that your account is legally verified in accordance with local law. • Performing risk control, legal compliance and sanctions screening	• Photo ID (driver’s license or passport with resident registration number redacted), name, address and passport number	Unless we are obligated to preserve your personal information by applicable laws and regulations, we will retain and use your personal information until your Alibaba Cloud account is deregistered.

When you register to become a user of the Alibaba Cloud Platform or purchase cloud services (Optional Consent)	• Communication to Customers for sales of Cloud Services, marketing or events	• Name, phone number, residential address, email address and fax number	Unless required by applicable laws and regulations, we will retain your personal information for marketing purposes only until: You withdraw your consent for such marketing activities, or Your Alibaba Cloud account is deregistered, whichever occurs first.

Period of Retention and Processing of Personal Data

We will process and retain personal information within the period of retention and use under applicable laws and regulations or the period of retention and use agreed upon by the data subject at the time of collection of personal information and as specified in this Privacy Policy. In certain circumstances, we will need to keep your personal data for legal reasons after our relationship has ended.

However, in any of the following cases, we will process and retain the data until the relevant case ceases to exist.

1) Records on transactions, such as labeling and advertising, terms and conditions of contracts and their performance pursuant to Article 6 (Preservation, etc. of Transaction Records) of the Act on the Consumer Protection in Electronic Commerce, Etc.

- Records of cancellation of contract or offer, payment, supply of goods, etc.: five (5) years
- Records on the settlement of consumer complaints or disputes: three (3) years
- Records on labeling and advertising: Six (6) months

2) Article 85-3 (Record and Preservation of Books, etc.) of the Framework Act on National Tax

- Books and evidentiary documents concerning all transactions prescribed by tax laws: five (5) years

3) Article 22 (Creation, Preservation and Destruction of Electronic Financial Transaction Records) of the Electronic Financial Transactions Act

- Records on electronic financial transactions: five (5) years

Your Rights

You have the right to request access to your personal data held by us (or on our behalf), to request correction of personal information in case of any error, to request deletion, withdrawal of consent, suspension of processing of such personal data. To exercise your rights, you may contact our Security and Compliance Department at DPO_Intl@alibabacloud.com. We will respond to your request within a reasonable timeframe. In relation to your data access requests, we will respond within 10 days.

However, the data subject's right to request access to and suspension of processing of his/her personal information may be limited pursuant to Articles 35(4) and 37(2) of the PIPA. In case a request is made to revise or delete certain personal information that is specified as being required to be collected under other laws and regulations, such personal information cannot be deleted.

Provision of Personal data to Third Parties

We may provide personal data as described in the Privacy Policy, including to affiliates of Alibaba Cloud, and to third parties as described below:

Name of Recipient	Items of Personal data provided	Recipient’s Purpose of Use	Period of Retention and Use by Recipient

Bankware Global Co., Ltd.	Name, company name, email address, mobile number, contact address, territory information	Communication for sales of Cloud Services and marketing support	Subject to termination of the contractual relationship between the recipient and us, in which case data will be deleted within 30 days from termination
Megazone Soft Corporation	Name, company name, email address, mobile number, contact address, territory information	Communication for sales of Cloud Services and marketing support	Subject to termination of the contractual relationship between the recipient and us, in which case data will be deleted within 30 days from termination
LASCOM Co., Ltd.	Name, company name, email address, mobile number, contact address, territory information	Communication for sales of Cloud Services and marketing support	Subject to termination of the contractual relationship between the recipient and us, in which case data will be deleted within 30 days from termination
SamSung SDS Co., Ltd.	Name, company name, email address, mobile number, contact address, territory information	Communication for sales of Cloud Services and marketing support	Subject to termination of the contractual relationship between the recipient and us, in which case data will be deleted within 30 days from termination
ETECH SYSTEM CO., LTD	Name, company name, rank and department, email address, mobile number, territory information	Communication for sales of Cloud Services and marketing support	Subject to termination of the contractual relationship between the recipient and us, in which case data will be deleted within 30 days from termination
CloIT Co.,Ltd	Name, company name, rank and department, email address, mobile number, territory information	Communication for sales of Cloud Services and marketing support	Subject to termination of the contractual relationship between the recipient and us, in which case data will be deleted within 30 days from termination

Delegation of Processing of Personal data

We delegate the processing of personal data to delegates including affiliates of Alibaba Cloud, and third parties as described below, which may process personal data according to the purpose of the delegation:

Delegatee	Description of Delegated Services
Alipay Singapore E-Commerce Private Limited	Payment instrument processing
DR & AJU LLC	Domestic Agent

Data Transfers to Overseas Country

We store the collected Personal Data in Singapore, for the purposes described in this Privacy Policy and until such purpose is achieved. The data is transmitted through information network, as needed. We may also transfer Personal Data overseas to affiliates of Alibaba Cloud when necessary and through information network including API transfer. We may also share Personal Data with the following third-party service provider(s) outside of South Korea as described below according to the Article 28-8(1)1, 3 of PIPA:

Recipient (Contact Information of Information Manager)	Country to which Personal data is to be Transferred	Date and Method of Transfer	Items of Personal data to be Transferred	Purposes of Use by Recipients	Period of Retention of Use by Recipient
Alibaba Cloud (Singapore) Private Limited (+82 2 3016 8733)	Singapore	Transmission of data through information network as needed	Personal information collected with the consent of the data subject to the processing of personal information	Purpose of Collection and Use of Personal Information with Consent from Data Subjects	Until customer's Alibaba Cloud account is deregistered
Alipay Singapore E-Commerce Private Limited (+65 68307260)	Singapore	Transmission of data through information network as needed	Payment instrument organization, payment instrument number, the security code, expiration date of payment instrument	Payment instrument processing	Until contract with recipient is terminated or expired

You have the right to refuse the overseas transfer of personal information as set forth above. If you wish to refuse the overseas transfer of your personal information, please contact [DPO_Intl@alibabacloud.com] to communicate your request. However, if you refuse, you may not be able to use our cloud services.

Additional Use and Provision of Personal data

In accordance with South Korea's Personal Information Protection Act (the "PIPA"), we may use or provide personal data within the scope of reasonably related to the initial purpose of the collection, in consideration of whether disadvantages have been caused to data subjects and whether necessary measures have been taken to secure such as encryption, etc. We will determine with due care whether to use or provide personal data in consideration of general circumstances including relevant laws and regulations such as the PIPA, purpose of use or provision of personal data, how personal data will be used or provided, items of personal data to be used or provided, matters to which data subjects provided consent or which were notified/disclosed to data subjects, impact on data subjects upon the use or provision, and measures taken to protect subject information. Specific considerations are as follows:

- Whether the additional use/provision is related to the initial purpose of the collection;
- Whether the additional use/provision is foreseeable in light of the circumstances under which personal data was collected and practices regarding processing;
- Whether the additional use/provision unfairly infringe on the interests of the data subject; and
- Whether the necessary security measures such as pseudonymization or encryption were taken.

Measures to Ensure Security of Personal Data

The following measures are taken to ensure the safety of personal data.

- Managerial measures: Establishment and implementation of internal management plan, operation of dedicated organization to personal data, regular employee training
- Technical measures: management of access rights to the personal data processing system, installation of an access control system, encryption of personal data, and installation and renewal of security programs;
- Physical measures: Control access to the data room, data storage room, etc.

Contact

If you have any questions or comments about the Privacy Policy and/or this Korea Addendum, if you need to report a problem, or if you would like to exercise your data subject rights in relation to information we have about you, please contact our Chief Privacy Officer (or department in charge of personal data protection) set out below:

- Department in Charge of Protection of Personal data

- Name of Department: Security and Compliance
- Telephone number: +82 2 3016 8733
- E-mail: DPO_Intl@alibabacloud.com

Domestic Privacy Representative

The information regarding the domestic agent is as follows:

- Company Name: DR & AJU LLC; Representative Director: Kichul Lee
- Address: 7-16th floor, Donghoon Tower, 317 Teheran-ro, Gangnam-gu, Seoul, South Korea
- Telephone number: +82 2 3016 8733
- E-mail: privacyalicloud@draju.com

If you need to report or consult about a personal data infringement issue, please contact:

- Personal Information Infringement Report Center (website: privacy.kisa.or.kr; phone: 118)
- Personal Information Dispute Mediation Committee (website: www.kopico.go.kr; phone: 1833-6972)
- Supreme Prosecutors' Office (website: www.spo.go.kr; phone: 1301)
- Cyber Investigation Bureau of the National Police Agency (website: ecrm.cyber.go.kr;phone: 182)

Updates

This Privacy Policy will be effective from September 2, 2025.

	Date of Update	Links to the Previous Version
1	December 31, 2022	[Link]
2	July 27, 2023	[Link]
3	December 7, 2023	[Link]
4	August 30, 2024	[Link]
5	April 22, 2025	[Link]