

Shanghai Recruitment Personal Information Privacy Statement

上海招聘个人信息隐私声明 – 求职者（中国境内）

Effective Date: February 10, 2025

生效日期：2025年2月10日

The purpose of this personal information privacy statement is to inform you about how your personal information is being processed by the D. E. Shaw Group (“we,” “us,” “our”) in accordance with the Personal Information Protection Law (the “PIPL”) of the People’s Republic of China (the “PRC”, for the purpose of this statement only excluding Hong Kong and Macau Special Administrative Regions and Taiwan region) when you apply for a role with the D. E. Shaw Investment Management (Shanghai) Co., Ltd. (“Company”):

本《个人信息隐私声明》旨在向您披露当您申请德劭投资管理（上海）有限公司（以下简称“公司”）的工作岗位时，德劭集团（简称“我们”“我们的”）将如何按照《中华人民共和国个人信息保护法》（简称“个保法”）的要求处理您的个人信息（为本声明目的，“中国境内”不含香港、澳门特别行政区和台湾地区）：

1. We may collect, hold, and use certain types of personal information about you, including but not limited to the following:

我们可能收集、持有和使用关于您的特定个人信息，包括但不限于：

- Identification and contact information such as your name, date of birth, gender, address, email address, and telephone number;
身份识别和联系信息，例如您的姓名、生日、性别、地址、电子邮件地址和电话号码；
- Details of education and employment history such as your qualifications, skills, experience, and contact information of your professional references;
您的教育和工作经历详情，例如您的资质、技能、经验，以及您的职业推荐人的联系方式；
- Sample work product such as examples of software code or your written work;
工作成果样本，例如您的软件代码或著作的样本；
- National identification information such as your nationality, residency, visa, and other work permit status;
国家身份识别信息，例如您的国籍、居住地、签证和其他工作许可状况；
- Details about your current or expected future compensation;
有关您当前薪资或未来预期薪资的详情；

- Information required for background checks and screening such as education and employment verification, credit and driver’s license checks, and criminal convictions and/or offences to the extent any is identified during a background check;

背景调查和筛查所需的信息，例如学历和雇佣经历查验、信用和驾照查验、犯罪记录和/或背景调查过程中发现的任何违法记录；

- Information you may provide voluntarily about your race/ethnicity and gender identity; and

您可能自愿向我们提供的、关于您的种族/民族和性别认同的信息；以及

- Any other information that you may choose to share with the D. E. Shaw Group or that may be necessary for the satisfaction of the purposes listed in section 2 below.

任何其他您可能选择与德劭集团分享，或为满足以下第 2 节所列的目的而需要的信息。

Sometimes we will collect personal information about you from third parties. For example, we might:

在某些情况下，我们可能从第三方收集关于您的个人信息，例如我们可能：

- Receive certain information identified above from a recruiter;

从招聘服务供应商收到上述的特定信息；

- Obtain professional references from a former employer or other relevant referee; and

从您的前任雇主或您的推荐人处获取您的职业推荐信息；

- Engage a background check provider to undertake an employment, education, credit, and/or criminal background check, or a public source review.

聘用背景调查服务商进行与任职、教育、信用和/或犯罪相关的背景调查，或通过公共资源核查。

Certain information listed above is “sensitive personal information” under the PIPL, which means any personal information that, once leaked or illegally used, is likely to cause harm to the personal dignity of the relevant individual or potentially endangers the physical and property safety of the individual, including your national identification information, criminal records, and credit history, as well as voluntarily provided information about your race/ethnicity and gender identity (if any).

以上所列举的特定信息是个保法所规定的“敏感个人信息”，即一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括您的国家身份信息、犯罪记录和信用记录，以及您自愿提供的关于您的种族/民族和性别认同的信息（如有）。

2. We may collect, hold, and use your personal information for purposes directly or indirectly relevant to your application for a role with the Company or any other member of the D. E. Shaw Group, including but not limited to:

我们收集、持有和使用您的个人信息的目的可直接或间接与您申请公司或德劭集团任何其他成员的工作岗位相关，包括但不限于：

- Communicate with you regarding your application and our recruitment process;

与您沟通您的工作申请和我们的招聘流程；

- Process and assess your application for a role with the Company;

处理和评估您对公司工作岗位的申请；

- Administer, manage, and improve our recruitment operations, including monitoring our compliance with our internal rules and policies;

实施、管理和改进我们的招聘工作，包括监督我们对内部规章制度的遵守情况；

- Undertake the preparatory steps necessary for the Company to enter into an employment agreement with you to the extent your application is successful;

当您成功申请公司的工作岗位，为与您订立劳动合同进行必要的准备工作；

- Conduct reference and background checks about you, including criminal history check, credit history check, education, qualification and employment history verification, and professional license verification;

对您进行推荐和背景调查，包括犯罪记录查验、信用记录查验、教育、资质和任职经历查验，以及职业资格证书查验；

- Meet our obligations with respect to recruiting agencies acting on your behalf;

履行我们对代表您行事的招聘服务供应商所承担的义务；

- Fulfill our legal obligations such as verification of your eligibility to work, our compliance with legal and regulatory requirements, responding to any actual or prospective legal proceedings, action, investigation, or inquiry in any relevant jurisdiction;

履行我们的法定义务，例如审查您的任职资格、遵守法律和监管要求、应对在任何相关司法管辖区发生的任何实际或潜在的法律程序、行动、调查或问询；

- Apply for licences, registrations, or memberships with regulators or self-regulatory organisations;

向监管机构或自律组织申请牌照、登记或会员资格；

- Facilitate any merger, acquisition, reorganisation, spin-out, outsourcing, or sale of all or part of our business;

实现我们全部或部分业务的合并、收购、重组、分拆、外包或出售；

- For security, including IT system security, or to detect, prevent, or investigate any actual or suspected fraud, illegal activity, or other misconduct;

确保安全，包括信息技术系统安全，或识别、预防或调查任何实际或疑似的欺诈、非法活动或其他不当行为；

- Inform you about prospective employment opportunities with us, unless you notify us that you do not wish to hear about any such opportunities by emailing us as described in the “**Contact Us**” section; and

通知您我们潜在的工作机会，除非您发送电子邮件至“联系我们”章节所列的邮箱，告知我们您不希望收到此类信息；以及

- Any other purposes directly or indirectly related to the above.

任何与上述目的直接或间接相关的其他目的。

Specifically, we process your sensitive personal information for the below purposes:

特别地，我们将为了以下目的处理您的敏感个人信息：

- We will process your national identification information, criminal records, and credit history to conclude and perform the contract with you, or to perform our statutory duties or obligations as an employer and/or private fund manager (for example, to consider whether you are suitable for a specific position). Without such information, we may not be able to evaluate your application and this may affect your rights and interests.

我们将为了订立或履行与您之间的合同，或履行我们作为用人单位和/或私募基金管理人的法定职责或义务而处理您的国家身份信息、犯罪记录和信用记录（例如，用于评估您是否适合特定的岗位）。缺少此类信息可能导致我们无法评估您的求职申请并影响您的权益。

- During the employment application and/or recruitment processes, you will have the opportunity to voluntarily provide us information about your race/ethnicity and gender identity. Such information will be used to evaluate and improve our diversity and inclusion efforts. For the avoidance of doubt, your choice as to whether or not to provide any such information will not in any way affect the review, or likelihood of success, of your application for employment.

在申请职位和/或招聘的流程中，您将有机会基于自愿原则向我们提供关于您的种族/民族和性别认同的信息。这些信息将被用于评估和改进我们的多元化与包容性工作。为免疑义，您可自行选择是否提供这类信息，且您的选择不会对我们审阅您的职位申请或申请成功与否造成任何影响。

We will obtain your separate consent to process your sensitive personal information if required by the PIPL. The D. E. Shaw Group will take necessary security measures to safeguard sensitive personal information in accordance with applicable law.

在个保法要求的情形下，我们将就处理您的敏感个人信息征得您的单独同意。德劭集团将依法采取必要的安全措施保护敏感个人信息。

- 3. We will not share your personal information except as set out below. We will obtain your separate consent when your personal information is provided to another personal information processor based within the PRC, or any recipients located outside of the PRC, where required by the PIPL.**

我们仅在下列情形下分享您的个人信息。在个保法要求的情形下，我们将征得您的单独同意，以向位于中国境内的其他个人信息处理者或位于中国境外的任何数据接收方提供您的个人信息。

- Any other member in the D. E. Shaw Group. You may find the names and contact details of the members of the D. E. Shaw Group on our website.

向德劭集团的任何其他成员提供。您可通过我们的网站了解这些德劭集团成员的名称和联系方式。

- Any relevant administrative or judicial departments or organisations with authorisation, in accordance with applicable laws and regulations or administrative or judicial requirements.

根据适用的法律法规、行政或司法要求，向相关行政、司法部门或经适当授权的组织提供。

- Any third party in connection with any merger, acquisition, reorganisation, spin-out, outsourcing or sale of all or part of our business.

与我们全部或部分业务的合并、收购、重组、分拆、外包或出售相关的任何第三方。

- Any agent, contractor, or third-party service provider engaged by the Company or any other member of the D. E. Shaw Group. Names and contact details of the data

recipients located outside of the PRC, the purposes and manners of processing, and the types of personal information to be provided are set out in the below table.

向公司或德劲集团任何其他成员聘用的任何代理、承包商，或第三方服务供应商提供。位于中国境外的数据接收方的名称、联系方式、处理目的、处理方式和拟提供的个人信息类型如下表所示。

Recipient name 接收方名称	Contact Details 联系方式	Purpose of processing 处理目的	Manner of processing 处理方式	Types of personal information to be provided 拟提供的个人信息类型
Accurate Background, Inc. (Accurate)	Address: 200 Spectrum Center Drive, Suite 1100 Irvine, CA 92618 USA 地址：美国加州尔湾市光谱中心大道 200 号 1100 室；邮编：92618 Phone: +1 (800) 784-3911 电话：+1 (800) 784-3911	Conducting background checks (including employment, education, credit (only for certain roles), and criminal (only once an offer is made) checks) 开展背景调查（包括就职、教育、信用（仅限特定岗位）和犯罪记录（仅限已发出录用通知的应聘者）调查）	Accurate uses the candidates' personal information to verify materials provided by the candidates and request relevant records from educational institutions, former employers, credit agencies and government authorities Accurate 使用应聘者提供的个人信息以核实其提供的资料并向教育机构、前任雇主、信用机构、政府部门等索取相关记录	i. Name, date of birth, address 姓名、生日、地址 ii. For PRC citizens: name in Chinese and a copy of the PRC ID card and/or number 中国公民：中文姓名和身份证复印件和/或号码 iii. For non-PRC citizens: a copy of the passport and/or passport number and addresses while in China 非中国公民：护照复印件和/或护照号码和在中国地址
Kroll Associates (Asia) Limited (Kroll)	Address: Level 3, Three Pacific Place, 1 Queen's Road East, Hong Kong 地址：香港皇后大道东 1 号太古广场三座 3 层 Phone: +852 2884 7788 电话：+852 2884 7788	Conducting background checks (including employment, education, credit (only for certain roles), and criminal (only once an offer is made) checks) 开展背景调查（包括就职、教育、信用（仅限特定岗位）和犯罪记录（仅限已发出录用通知的应聘者）调查）	Kroll uses the candidates' personal information to perform comprehensive review and analysis of publicly available and/or commercially subscribed sources Kroll 使用应聘者的个人信息，通过公开或可订阅的信源开展综合审核和分析	Name, date of birth, address, a copy of the government ID card and/or number 姓名、生日、地址、政府签发的身份证件复印件和/或号码
iCIMS, Inc. (iCIMS)	Address: 101 Crawfords Corner Road, Suite 3-100 Holmdel, NJ 07733 USA 地址：美国新泽西州霍姆德尔市克劳福德角路 101 号，3-100 室；邮编 07733 Phone: (732) 847-1941 电话：(732) 847-1941	Tracking recruiting and onboarding materials and documents such as resume, contact information, and interview comments 跟踪招聘及入职材料和文件，例如简历、联系信息和面试评价	iCIMS provides application tracking system to the D. E. Shaw Group, including by storing candidate information and managing recruitment process iCIMS 为德劭集团提供申请跟踪系统，服务方式包括存储应聘者信息和管理招聘流程	Name, email, phone number, education and professional experience, resume, coding test results, interview comments and references (if applicable) 姓名、电子邮箱、电话号码、教育和职业经历、简历、编程测试结果、面试评价和推荐信（如适用）

Recipient name 接收方名称	Contact Details 联系方式	Purpose of processing 处理目的	Manner of processing 处理方式	Types of personal information to be provided 拟提供的个人信息类型
Gem Software, Inc. (Gem)	Address: One Post Street 18th Floor San Francisco, CA 94104 USA 地址：美国加州旧金山 邮政街一号 18 层；邮编：94104	Sourcing and storing data on prospective candidates / talent 获取和存储与潜在应聘者/人才相关的数据	Gem stores information provided by the D. E. Shaw Group to source candidates for any future employment opportunities Gem 存储德劲集团提供的信息以为未来的就业机会物色合适的候选人	Name, email, LinkedIn URL, and application date 姓名、电子邮箱、领英链接和申请日期
BrainFights, Inc. (CodeSignal)	Address: 201 California Street Suite 1240. San Francisco, California, USA 地址：美国加州旧金山 加利福尼亚街 201 号 1240 室 Phone: (415)-488-6986 电话：(415)-488-6986	Conducting technical coding assessments for candidates 对应聘者进行编程测试	Candidates provide CodeSignal with their names and email addresses to have access to the CodeSignal platform to take the coding assessment. After the assessment, CodeSignal sends the D. E. Shaw Group the coding assessment results, which are then integrated into the iCIMS platform 应聘者向 CodeSignal 提供姓名和电子邮箱，以获得访问该平台并进行编程测试的权限。测试后 CodeSignal 将编程测试结果发送给德劲集团，后续将导入 iCIMS 平台	Name and email 姓名和电子邮箱

4. Under the PIPL, you are entitled to the following legal rights:

依据个保法，您享有以下法定权利：

- the right to obtain information regarding the processing of your personal information and to request us to explain our rules of personal information processing;

您对个人信息处理活动享有知情权，且有权要求我们解释个人信息处理规则；

- the right to withdraw your consent to the processing of your personal information at any time. If you withdraw your consent, it will not affect the effectiveness of our processing activities based on your consent before the withdrawal. However, please note that in some cases, even if you withdraw your consent, we may still have the right to process your personal information based on other legal grounds;

您有权随时撤回对处理您个人信息的同意。如您撤回同意，不影响撤回前我们基于您的同意已进行的处理活动的效力。但请注意在某些情况下，即使您撤回同意，我们仍有权基于其他法律依据处理您的个人信息；

- the right to access the information we hold about you and obtain a copy of such information;

您有权查阅、复制我们持有的关于您的信息；

- if you request us to transfer your personal information to certain designated personal information processor, we will provide the channel of transfer provided that the conditions specified by applicable law are met;

如果您要求我们将您的个人信息转移至指定的个人信息处理者，在符合适用法律所规定条件的情况下，我们将提供转移渠道；

- the right to request us to correct or supplement inaccurate or incomplete personal information;

您有权要求我们更正、补充不准确或不完整的个人信息；

- under certain circumstances, the right to request us to erase your personal information;

在特定情形下，您有权要求我们删除您的个人信息；

- under certain circumstances, the right to object to or restrict our processing of your personal information;

在特定情形下，您有权拒绝或限制我们处理您的个人信息；

- where an automated decision has material impacts on your rights and interests, the right to request explanation on the processing and not being subject to a decision based solely on automated processing; and

当我们通过自动化决策方式作出对您的权益有重大影响的决定时，您有权要求我们予以解释，并有权拒绝我们通过自动化决策的方式作出决定；以及

- the right to complain and report illegal personal information processing activities to competent regulators.

您有权就违法个人信息处理活动向个人信息保护机关进行投诉、举报。

To exercise your privacy rights, please raise the request by emailing us as described in the **“Contact Us”** section.

如您希望行使上述隐私权利，请发送电子邮件至“联系我们”章节所列的邮箱来提出您的要求。

5. We will retain your personal information only for as long as it is considered necessary for the fulfilment of the purposes described under Section 2 above, unless otherwise required or permitted by law, and in accordance with our internal retention policies.

我们将按照我们的内部数据留存制度，仅在为实现以上第 2 节所列的处理目的所必要的期限内保留您的个人信息，除非法律另行要求或允许我们保留更长的时间。

- If your application for employment is successful, your personal information gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your personal information will be held will be provided to you in a new privacy notice.

如果您成功申请工作岗位，我们在招聘流程中收集的您的个人信息将转入您的人事档案，并在公司与您的劳动关系存续期间予以保留。我们将通过一份新的隐私通知，向您告知您的个人信息的具体留存期限。

- If your application for employment is unsuccessful, we will retain your personal information to inform you about any future employment opportunities with us. If you do not wish to hear about any such opportunities, please email us as described in the **“Contact Us”** section.

如果您未能成功申请工作岗位，我们将保留您的个人信息，以便通知您我们未来的工作机会。如果您不希望了解此类工作机会，请发送电子邮件至“联系我们”章节所列的邮箱。

If you would like more information about applicable data retention policies, please email us as described in the **“Contact Us”** section. If you have submitted a resume to us and do not wish to proceed with your application, please email cvwithdraw@deshaw.com.

如果您希望进一步了解适用的数据留存制度，请发送电子邮件至“联系我们”章节所列的邮箱。如果您已向我们提交简历但希望撤回您的工作申请，请发送邮件至 cvwithdraw@deshaw.com。

6. Contact Us. If you have any questions about this personal information privacy statement or wish to exercise your rights as specified herein, please email us at privacy@deshaw.com.

联系我们。如果您对本《个人信息隐私声明》有任何疑问，或希望行使本声明所列举的您的权利，请发送电子邮件至 privacy@deshaw.com。