

Privacy Notice – Mainland China Privacy Schedule

This China Privacy Schedule supplements our General Privacy Notice and applies where the Personal Information Protection Law of the People's Republic of China, together with applicable PRC data protection, cybersecurity and data security laws, applies to our processing of personal information.

For the purposes of this Privacy Schedule, “**personal information**”, “**sensitive personal information**”, “**processing**” and “**personal information processor**” have the meanings given under applicable PRC law.

Otherwise, unless defined herein, capitalised terms in this Privacy Schedule shall be as defined in our General Privacy Notice. In particular, “**Agency**” and “**Agency Group**” refer to the specific agency, legal entity or group of entities responsible for the relevant processing, as described in the General Privacy Notice.

1. Personal information processor

The personal information processor responsible for your personal information will usually be the Agency Group entity with which you or your organisation has a relationship, or which operates the relevant website, event or service.

You may contact us at: DPO@the-independents.com

Please see our General Privacy Notice for details of the relevant local entity or representative. Where required by PRC law, other details will be provided separately.

2. Categories of personal information we process

We may process the following categories of personal information:

Category	Examples
Identity and contact information	Name, employer, job title, business address, email address, telephone number, social media/professional profile details
Business communications	Emails, messages, meeting notes, call notes, event interactions and professional correspondence
Profile and relationship information	Preferences, event attendance, interests, feedback, marketing preferences and relationship management notes
Technical and usage information	IP address, browser type, device identifiers, website usage data, cookie and analytics information
Compliance information	Information used for sanctions, anti-bribery, KYC, onboarding, supplier/client screening and related checks
Financial and transaction information	Invoicing details, payment information, purchase order details and transaction records
Other information	Information you or your organisation provide to us in the course of business

3. Purposes and methods of processing

We process personal information by electronic and, where necessary, manual means for the following purposes:

- managing our business relationship with you or your organisation;
- communicating with you;

- providing or receiving services;
- administering contracts, projects, accounts, procurement and payments;
- organising and managing events;
- conducting compliance, sanctions, anti-bribery, KYC and onboarding checks;
- sending business updates, invitations and marketing communications, where permitted;
- maintaining and improving our website, systems, services and operations;
- managing group administration, reporting and internal business operations;
- protecting our business, systems, staff, clients and partners;
- managing corporate transactions, reorganisations or integrations; and
- complying with legal, regulatory, tax, accounting and reporting obligations.

4. Sensitive personal information

We do not usually seek to collect sensitive personal information from business contacts.

Where we need to process sensitive personal information, we will do so only where there is a specific purpose and sufficient necessity, and where required by PRC law we will obtain your separate consent.

Sensitive personal information may include information such as identification documents, financial account information, precise location data, health information, biometric information or other information treated as sensitive under PRC law.

5. Sharing, entrusted processing and disclosure

We may share or entrust processing of your personal information with the categories of recipients described in our General Privacy Notice, including:

- Agency Group and The Independents Group companies;
- IT, hosting, CRM, email, marketing and system administration providers;
- event partners and business partners;
- professional advisers, including lawyers, auditors, insurers and accountants;
- compliance screening providers;
- regulators, courts, public authorities and law enforcement bodies; and
- parties involved in corporate transactions, reorganisations or integrations.

Where required by PRC law, we will provide additional details and/or obtain separate consent before sharing your personal information with another independent personal information processor.

6. Cross-border transfers of personal information

Because we are part of an international group, your personal information may be transferred outside Mainland China to Agency Group entities, The Independents Group entities, clients, business partners and service providers in other jurisdictions, including the UK, EEA, United States, Hong Kong, Singapore, Japan, Korea, Switzerland, UAE and other countries in which we, our group companies, clients or service providers operate.

Where required by PRC law, we will implement an appropriate cross-border transfer mechanism, which may include:

- obtaining your separate consent;
- conducting a personal information protection impact assessment;

- entering into the PRC standard contract for cross-border transfer of personal information;
- completing a security assessment where required; and/or
- applying other lawful transfer mechanisms recognised under PRC law.

Where required by PRC law, we will provide additional details of overseas recipients, including their name or category, contact details, country or region, processing purposes, processing methods, categories of personal information, retention period and how you may exercise your rights.

The table set out in the Appendix to this Privacy Schedule provides an overview of the categories of overseas recipients to whom personal information may be transferred. Where PRC law requires more specific details of named overseas recipients, these will be provided separately or on request, as required by applicable law.

7. Retention

We retain personal information only for the period necessary for the purposes described in this Privacy Schedule and our General Privacy Notice, unless a longer retention period is required or permitted by law.

When personal information is no longer required, we will delete it, anonymise it or otherwise handle it in accordance with applicable PRC law and our retention policies.

8. Automated decision-making

We do not use your personal information to make decisions based solely on automated processing that produce legal or similarly significant effects on you, unless we notify you separately and do so in accordance with applicable law.

Where we use automated tools, analytics or profiling in connection with our services, we will do so in accordance with applicable law. Where PRC law applies, you may have the right to request an explanation of automated decision-making and to refuse decisions made solely by automated decision-making where such decisions have a significant impact on your rights and interests.

9. Your PRC privacy rights

Subject to applicable PRC law, you may have the right to:

- know and decide about the processing of your personal information;
- restrict or refuse processing;
- access and copy your personal information;
- correct or supplement inaccurate or incomplete personal information;
- request deletion of your personal information;
- withdraw consent where processing is based on consent;
- request an explanation of our personal information processing rules; and
- request transfer of your personal information where applicable legal conditions are met.

To exercise your rights, please contact: DPO@the-independents.com

We may need to verify your identity before responding to your request.

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APPENDIX – CROSS-BORDER TRANSFERS OF PERSONAL INFORMATION

Overseas recipient	Country / region	Purpose of transfer	Categories of personal information	Processing method	Retention period	How to exercise rights
Agency Group companies and The Independents Group entities outside Mainland China	UK, EEA, United States, Hong Kong, Singapore, Japan, Korea, Switzerland, UAE and other jurisdictions where group entities operate	Group administration, business relationship management, service delivery, reporting, finance, legal, compliance, IT support, management oversight and internal operations	Identity and contact information, business communications, profile and relationship information, technical and usage information, compliance information, financial and transaction information and other relevant business information	Access, storage, use, organisation, analysis, transmission, hosting, support and reporting	As described in our General Privacy Notice, this Privacy Schedule and our applicable retention policies; generally for as long as necessary for the relevant business, legal, compliance, contractual or operational purpose	DPO@the-independents.com
IT, hosting, cloud, CRM, email, collaboration and system administration providers	UK, EEA, United States, Hong Kong, Singapore and other jurisdictions depending on the provider and system used	Hosting, storage, IT support, system administration, cybersecurity, CRM management, email communications, collaboration tools and business continuity	Identity and contact information, business communications, technical and usage information, profile and relationship information and other information stored in relevant systems	Hosting, storage, access, transmission, support, maintenance, security monitoring and troubleshooting	For the duration of the relevant service and thereafter as required by contract, law or applicable retention policy	DPO@the-independents.com
Clients, brands, event partners, production partners and business partners	Relevant client or partner jurisdictions, which may include the UK, EEA, United States, Hong Kong, Singapore, Japan, Korea, UAE and other event or project locations	Delivering services, managing campaigns, events, productions, collaborations, guestlists, logistics, reporting, client communications and business relationships	Identity and contact information, business communications, profile and relationship information, event or project information, logistics information and other information relevant to the specific service	Access, use, transmission, organisation, analysis, reporting and project administration	For the duration of the relevant project, event, campaign or business relationship and thereafter as required for legal, contractual, audit, reporting or dispute purposes	DPO@the-independents.com

Overseas recipient	Country / region	Purpose of transfer	Categories of personal information	Processing method	Retention period	How to exercise rights
Event, travel, hospitality, logistics and production service providers	Event, travel or production destination countries and provider locations, which may include the UK, EEA, United States, Hong Kong, Singapore, Japan, Korea, UAE and other jurisdictions	Event administration, travel booking, accommodation, transport, hospitality, access control, security, production support and related logistics	Identity and contact information, travel information, passport or identification details where necessary, accommodation details, event attendance, dietary/accessibility information where relevant and other logistics information	Access, use, transmission, booking, coordination, storage and support	For the duration of the relevant booking, event, travel, production or logistics purpose and thereafter only as required for legal, audit, security, insurance or dispute purposes	DPO@the-independents.com
Finance, accounting, payment, banking and professional services providers	UK, EEA, United States, Hong Kong, Singapore, Switzerland and other jurisdictions depending on the provider	Payments, invoicing, accounting, audit, tax, banking, legal, insurance, compliance and professional advisory services	Identity and contact information, financial and transaction information, invoices, payment details, purchase order information, tax/accounting information and relevant business communications	Access, use, storage, transmission, review, reporting, audit and professional advice	For the period required for payment, accounting, tax, audit, legal, regulatory and dispute purposes, in accordance with applicable law and our retention policies	DPO@the-independents.com
Compliance screening, sanctions, anti-bribery, KYC and onboarding providers	UK, EEA, United States and other jurisdictions depending on the provider	Supplier/client screening, sanctions checks, anti-bribery checks, onboarding, compliance, risk management and regulatory recordkeeping	Identity and contact information, employer/company information, role/title, due diligence information, screening results and relevant compliance information	Access, screening, matching, review, storage, reporting and transmission	For as long as necessary for compliance, legal, audit, regulatory, risk management and dispute purposes	DPO@the-independents.com
Professional advisers, regulators, courts, public authorities and law enforcement bodies	Relevant jurisdictions depending on the matter	Legal advice, audit, insurance, regulatory compliance, litigation, investigations,	Relevant categories of personal information necessary for the relevant legal,	Access, use, disclosure, transmission, review, storage and professional analysis	For as long as required or permitted by applicable law, professional	DPO@the-independents.com

Overseas recipient	Country / region	Purpose of transfer	Categories of personal information	Processing method	Retention period	How to exercise rights
		enforcement, reporting and protection of rights	regulatory, audit, insurance, investigation or dispute purpose		obligations, regulatory requirements, litigation hold, audit or dispute purposes	
Parties involved in corporate transactions, reorganisations, integrations, investments or asset sales	Relevant jurisdictions depending on the transaction	Due diligence, transaction planning, corporate integration, restructuring, investment, merger, acquisition or asset sale	Identity and contact information, business communications, financial and transaction information, contractual information, compliance information and other information relevant to the transaction	Access, review, analysis, disclosure, storage, transmission and integration planning	For the duration of the transaction process and thereafter as required for legal, regulatory, audit, corporate recordkeeping or dispute purposes	DPO@the-independents.com
The Independents Group entities outside Mainland China	UK, EEA, United States, Hong Kong, Singapore, Japan, Korea, Switzerland, UAE and other jurisdictions where group entities operate	Group administration, business relationship management, service delivery, reporting, finance, legal, compliance, IT support, management oversight and internal operations	Identity and contact information, business communications, profile and relationship information, technical and usage information, compliance information, financial and transaction information and other relevant business information	Access, storage, use, organisation, analysis, transmission, hosting, support and reporting	As described in our General Privacy Notice, this Privacy Schedule and our applicable retention policies; generally for as long as necessary for the relevant business, legal, compliance, contractual or operational purpose	DPO@the-independents.com
IT, hosting, cloud, CRM, email, collaboration and system administration providers	UK, EEA, United States, Hong Kong, Singapore and other jurisdictions depending on the provider and system used	Hosting, storage, IT support, system administration, cybersecurity, CRM management, email communications,	Identity and contact information, business communications, technical and usage information, profile and relationship	Hosting, storage, access, transmission, support, maintenance, security monitoring and troubleshooting	For the duration of the relevant service and thereafter as required by contract, law or applicable retention policy	DPO@the-independents.com

Overseas recipient	Country / region	Purpose of transfer	Categories of personal information	Processing method	Retention period	How to exercise rights
		collaboration tools and business continuity	information and other information stored in relevant systems			
Clients, brands, event partners, production partners and business partners	Relevant client or partner jurisdictions, which may include the UK, EEA, United States, Hong Kong, Singapore, Japan, Korea, UAE and other event or project locations	Delivering services, managing campaigns, events, productions, collaborations, guestlists, logistics, reporting, client communications and business relationships	Identity and contact information, business communications, profile and relationship information, event or project information, logistics information and other information relevant to the specific service	Access, use, transmission, organisation, analysis, reporting and project administration	For the duration of the relevant project, event, campaign or business relationship and thereafter as required for legal, contractual, audit, reporting or dispute purposes	DPO@the-independents.com or, where appropriate, the relevant client or partner identified to you
Event, travel, hospitality, logistics and production service providers	Event, travel or production destination countries and provider locations, which may include the UK, EEA, United States, Hong Kong, Singapore, Japan, Korea, UAE and other jurisdictions	Event administration, travel booking, accommodation, transport, hospitality, access control, security, production support and related logistics	Identity and contact information, travel information, passport or identification details where necessary, accommodation details, event attendance, dietary/accessibility information where relevant and other logistics information	Access, use, transmission, booking, coordination, storage and support	For the duration of the relevant booking, event, travel, production or logistics purpose and thereafter only as required for legal, audit, security, insurance or dispute purposes	DPO@the-independents.com