Developer name: Aquametro Oil & Marine (Shanghai) Co., LTD

Application name: Fleet Monitoring Control

Privacy Policy of Fleet Monitoring Control

Release date: May 2023

Version Effective date: May 2023

Foreword

You are welcome to use the Fleet Monitoring Control products and services! Fleet Monitoring Control knows the importance of user information to you and will do its best to keep your user information safe and reliable. Fleet Monitoring Control is committed to maintaining your trust in us, adhering to the following principles to protecting your user information: the principle of power and responsibility, clear purpose, consent, minimum adequacy, security, subject participation, openness and transparency, etc. At the same time, we promise that we will take security protection measures to protect your user information and privacy according to the industry mature security standards, so we hereby formulate the Fleet Monitoring Control Privacy Policy (hereinafter referred to as the "Policy"). This policy applies to information you access and use the Fleet Monitoring Control platform (including but not limited to Fleet Monitoring Control APP, website, public account, etc.).

Please read and understand this privacy policy carefully before using our products (or services).

This policy will help you understand the following:

- I. How the Fleet Monitoring Control collects and uses your user information
- 2. How does Fleet Monitoring Control use Cookie and similar technologies
- 3. How do Fleet Monitoring Control and third parties with Fleet Monitoring Control access share, transfer and publicly disclose your user information
- How does the Fleet Monitoring Control protect your personal information
- V. How does the Fleet Monitoring Control manage your personal information
- VI. Your rights
- 7. Protection of minors
- VIII. Applicable Law and dispute resolution
- IX. Change and revision of this policy
- X. How to contact the Fleet Monitoring Control

1. The Fleet Monitoring Control collects and uses your user information

(I) The information that we collect and use during your use of Fleet Monitoring Control products or services

We will only for the business function described in this policy, collect and use your user information, the purpose of collecting user information is to provide you with products or services, you have the right to choose whether to provide the information, but in most cases, if you do not provide, we may not be able to provide you with the corresponding service, also cannot respond to the problems you encounter.

To realize the additional functions provided to you by our products or services, you may choose to authorize us to collect and use your personal sensitive information. If you refuse to provide, you will not be able to use the relevant additional functions or achieve the function effect we intend to achieve, but it will not affect your normal use of the basic functions of our products or services.

When you register for your Fleet Monitoring Control account, we will collect your mobile phone number, which is sensitive information and is collected for identity verification. The mobile phone number is the necessary information, and if you refuse to provide it, you cannot complete the registration. When you use our services, allow us to collect information or necessary to provide to us, equipment model, operating system, login IP address, access mode, type, status, network quality data, equipment accelerator (e. g., gravity sensing equipment), operation logs, service log information (such as search, viewing records, service failures, referral sites, etc.), basic information that must be collected for service. With your authorization, we may open the location, mobile phone operating system model and version, international mobile device ID, unique device ID, machine MAC address, mobile phone task list, device SSID, photo album access rights.

In particular, access to the above information is necessary rather than sufficient for us to collect specific information. Having a specific sensitive authority does not mean that we will necessarily collect your information; even if we have obtained it, it is only, if necessary, under this Privacy Policy.

The above information you provide will be continuously authorized to us during your use of the Service. When you stop using the service, we will stop using it and delete the above information.

We guarantee that the collected user information will be deidentified or anonymized in accordance with the law. For the information that cannot identify the natural person alone or in combination with other information, it is not the personal information in the legal sense. If we identify non-personal information in combination with other information to your personal identity, or if we use it in combination with your personal information, we will process and protect such information as your personal information in accordance with this Privacy Policy.

To better operate and improve our technology and services, or for changing business strategy, with the collection, use or processing of, user information from the products or services or for other purposes.

(2) The use mode of the information

- 1. When you log in to Fleet Monitoring Control, we will get your mobile phone number, email address, and will send text messages to your mobile phone, or send email to your email. When you forget your account number and password, we will get your account number information and send a verification SMS or email. When you buy the ship history track data, you will get your information, mobile phone number and other data, and send text messages to your mobile phone after the purchase.
- 2. Obtain user information and generate self-defined area warning. Users can compile relevant ships into formation or groups according to needs, customize the alarm and warning conditions, and customized

conditions can be set on the map to facilitate user operation. Alarm and reminder judgment is to set the alarm and reminder trigger conditions for the alarm and reminder objects. When the trigger conditions occur, the alarm and reminder are generated.

3. When you consult Fleet Monitoring Control for customer service, Fleet Monitoring Control will get your WeChat ID to contact you. If you do not have WeChat ID or cannot use wechat, you will not be able to obtain customer service consultation with Fleet Monitoring Control through online service, then you can contact Fleet Monitoring Control by calling Fleet Monitoring Control customer service consultation telephone, QQ group or sending email.

4, when you use the platform developed by our company support various forms of import or generate planned route, will pop up on your computer to upload route file selection, support through manual upload, special mail receive various ways to upload plan route, will read the files on your computer, using the mathematics of navigation, combined with planned route, track calculation, or in a given ETA, combined with planned route ship speed, to provide reference for ship navigation decisions.

5. When you use some value-added functions and services on our platform, you will need to provide personal contact information and company information, which will be used to confirm the user identity and provide corresponding services. Such as the ship valuation function, Need to refine both personal and corporate information, So that we can contact you to open a more professional service; Certified service provider function, To expose your company's products and services on our platform, Therefore, you need to provide clear and complete company information, Include the names, Company type, service type, service port, service provided, address, contact person, mobile phone number, email address, etc., Short instructions, Public display after confirming the user identity, Easy for users in need to obtain contact information; besides, If you need to apply for an invoice online, Contact information of the company leader is required, Taxpayers' identification code, The Company Address, Bank of bank and account number, This information is mainly used to help in signing contracts and issuing VAT invoices. The above information is a sensitive information. If you refuse to provide it, you will not be able to use the corresponding functions, but it will not affect your use of other functions of Fleet Monitoring Control.

6. In order to better operate and improve our technology and services, or for changes in business strategy, user information is collected, used, processed for products or services or for other purposes not specified in this Privacy Policy or for other purposes.

(3) Exceptions to the authorized consent

- Please understand that, in accordance with laws, regulations and relevant national standards, you are not required to collect and use your user information in the following circumstances:
- 1. Direct related to national security and national defense security;
- 2. Direct related to public safety, public health and major public interests;
- 3. Directly related to crime investigation, prosecution, trial and judgment execution;
- 4. Due to protect your major legitimate rights and interests but it is difficult to get my consent;
- 5. The user information collected is disclosed to the public by you yourself;

- 6. Your user information collected from legal and publicly disclosed information, such as legal news reports, government information disclosure and other channels;
- 7. Required to sign or perform the contract according to your requirements;
- 8. necessary to maintain the safe and stable operation of software and related services, such as discovery and disposal of faults of software and related services;
- 9. The personal information controller is necessary for the news unit and it to carry out legal news reports;
- 10. The personal information contained in the academic research institute in the public interest, and deidentifies the personal information contained in the results.
- 11. Other circumstances as stipulated by laws and regulations.

The following are the business functions of the Fleet Monitoring Control map permission, the purpose of calling the permission, and asking you before calling the permission:

1. Permission description: fixed position

(1) Business function: Locate the service, mark location

(2) Call purpose: Gets the current user location for locating and marking locations

(3) Collect personal information: User location(4) Whether to ask: First installation for inquiry

2. Permission description : Camera / photo

(1) Business function: Upload the picture of the ship

(2) Call purpose: Realize the photo upload, mobile phone photo album upload and other function requirements

(3) Collect personal information: Ship pictures

(4) Whether to ask: Call the camera function to query

3. Permission description: System version

(1) Business function: Operating system version, Baidu statistics

(2) Call purpose: View the application version number and check for application compatibility

(3) Collect personal information: Device identification number

(4) Whether to ask: Get it automatically, without asking

2. How does Fleet Monitoring Control use Cookie and similar technologies

(1) Cookie

To ensure the site is functioning, we store small data files named Cookie on your computer or mobile device. The Cookie typically contains identifiers, site names, and some numbers and characters. With Cookie,

the Web site can store your access preferences data.

We will not use Cookie for any purpose other than the purposes stated in this policy. You can manage or

delete Cookie according to your preferences. You can clear all Cookie's saved on your computer, and most

web browsers have features to block Cookie s.

(2) Website beacon and pixel tag

In addition to Cookie, we also use other similar technologies such as website beacons and pixel tags on

the website. For example, the email we send you may contain a click URL linked to the content of our site.

If you click on this link, we will follow this click to help us understand your product or service

preferences and improve customer service. Website beacons are usually a transparent image embedded in a

website or email. With the pixel labels in the e-mail, we can know whether the e-mail is turned on. If you do not

want your activities to be tracked in this way, you can unsubscribe from our mailing list at any time.

(3) Do Not Track (Do not trace)

Many web browsers have Do Not Track features that publish Do Not Track requests to Web

sites.Currently, major Internet standards organizations have not set up policies to define how websites should

respond to such requests.But if your browser has Do Not Track enabled, then all of our sites will respect your

choice.

3. How do Fleet Monitoring Control and third parties with Fleet Monitoring Control

access share, transfer and publicly disclose your user information

(1) Access to the third-party platform

The Fleet Monitoring Control may work with third parties to provide related services and share

information on third-party platforms.

Fleet Monitoring Control application embedded third-party SDK description:

1. SDK name: Wechat Development Kit

5

(1) SDK class: Third party landing

(2) Business function: Third-party login and sharing(3) Whether to obtain personal information: deny

(4) Call purpose: Users will share it to wechat

2. SDK name: Baidu mobile statistics

(1) SDK class: Data analysis, cloud platform, and auxiliary operation

(2) Business function: Traffic and Access Statistics(3) Whether to obtain personal information: deny

(4) Call purpose: Monitor the number of platform visits

3. SDK name: Baidu Map

(1) SDK class: Life services, map navigation

(2) Business function: Map navigation positioning(3) Whether to obtain personal information: deny

(4) Call purpose: Calculate the distance of the ship from the user

(2) Sharing

• The Fleet Monitoring Control will not share your user information with any other company, organization, or individual, except where:

- 1. Sharing with explicit consent: After obtaining your explicit consent, we will share your user information with other parties.
- 2. We may share your user information in accordance with laws and regulations, or in accordance with the mandatory requirements of the competent government authorities.
- 3. Sharing with our affiliates: Your user information may be shared with our affiliates. We will only share the necessary user information and are subject to the purpose stated in this Privacy Policy. If the associate wants to change the purpose of processing the user information, it will seek your authorization consent again.
- 4. Sharing with Authorized Partners: For the purposes stated in this Policy only, some of our services will be provided by the Authorized partners. We may share some of your user information with our partners to provide a better customer service and user experience. We will only share your user information, for legitimate, legitimate, necessary, specific, explicit purposes, and will only share the user information that is necessary to provide the service. To better operate and improve the technology and services, you agree that we and our authorized partners may use the information collected for other services and purposes, while in compliance with relevant laws and regulations.
- Below are the specific authorized partners, and we recommend that you read that third party's privacy policy:
- Satellite AIS data and Dynamic-AIS data (ship base) are licensed by Spire

- The AVCS Online chart service is licensed by UKHO
- The Cmap chart service is licensed by Jeppesen
- The Inbound Guide is authorized by the Findaport
- Tidal forecast data are authorized by the National Marine Information Center
- Ship valuations are authorized by the Weselmann

(3) Transfer

- The Fleet Monitoring Control will not transfer your user information to any company, organization or individual, except where:
- 1. Transfer with explicit consent: After obtaining your explicit consent, we will transfer your user information to other parties;
- 2. In case of merger, acquisition or bankruptcy liquidation, if the transfer of user information is involved, we will require new companies and organizations that hold your user information to continue to be subject to this privacy policy, otherwise we will require the company and organization to ask you for authorization again.

(4) Public disclosure

- We will publicly disclose your user information only if:
- 1. After obtaining your explicit consent;
- 2. Legal-based disclosure: If you may be required by law, legal procedures, litigation, we may publicly disclose your user information.

(5) Exceptions to prior authorization consent when sharing, transferring and publicly disclosing information

- Please understand that, in accordance with laws, regulations and relevant national standards, we do
 not need to authorize, to share, transfer or publicly disclose your user information in the following
 circumstances:
- 1. Direct related to national security and national defense security;
- 2. Direct related to public safety, public health and major public interests;
- 3. Directly related to crime investigation, prosecution, trial and judgment execution;

- 4. Due to protect your major legitimate rights and interests but it is difficult to get my consent;
- 5. Information that you will disclose to the public by yourself;
- 6. Collected from legally and publicly disclosed information, such as legal news reports, government information disclosure and other channels.

4 How does the Fleet Monitoring Control protect your personal information

- (1) We have used industry-standard security safeguards to protect the user information you provide from unauthorized access, public disclosure, use, modification, damage or loss of the data. We will take all reasonable and feasible measures to protect your user information. For example, you are protected by SSL encryption when exchanging data between your browser and services; we provide https secure browsing; we use encryption to ensure data confidentiality; we use trusted protection to prevent malicious attacks; we deploy access control mechanisms to ensure that only authorized people have access to user information; and we conduct security and privacy training courses to enhance employee awareness of the importance of protecting user information.
- (2) During your use of Fleet Monitoring Control products or services, we will continue to save for you unless you request to delete and cancel your account; when our products and services are suspended or changed, we will notify you in the form of push, announcement, and delete your personal information or conduct anonymous processing within a reasonable period.
- (3) When using Fleet Monitoring Control products and services, your personal information will be stored in the People's Republic of China. If cross-border transmission or storage is required abroad, we will handle it in accordance with relevant laws and regulations, obtain your authorization and consent separately, and inform you that your personal information will be stored in countries and regions abroad.
- (4) We will take all reasonable and feasible measures to ensure that irrelevant user information is not collected. We will only retain your user information for the period required to meet the purposes stated in the cost policy, unless the retention period is extended or permitted by law.
- (5) The Internet is not an absolutely secure environment, and E-mail, instant messaging, and communication methods with other users are not encrypted. We strongly recommend that you do not send user information through such means.
- (6) The Internet environment is not 100 percent secure, and the Fleet Monitoring Control will try to ensure the security of any information you send to us. Even if we have made great efforts and taken all reasonable and necessary measures, we may not prevent your user information from being illegally accessed, stolen, tampered with or destroyed, thus damaging your legitimate rights and interests. Please understand the above risks of the information network and voluntarily bear them.
- (7) After the unfortunate occurrence of user information security incidents, we will timely inform you in accordance with the requirements of laws and regulations: the basic situation and possible impact of the security incidents, the measures we have taken or will take, you can independently prevent and reduce risks, remedial measures to you, etc.We will timely inform you of the event by mail, letter, telephone, push notice and other ways. When it is difficult to inform the user information subject one by one, we will issue the announcement in a reasonable and effective way. At the same time, we will also take the initiative to report

the handling of user information security incidents in accordance with the requirements of the regulatory authorities.

5. How does the Fleet Monitoring Control manage your personal information

(1) Manage your personal information

Managing your personal information means that Fleet Monitoring Control collects the user's personal information stored, including the user's mobile phone number, user name, registration area, company name, contact information, contact address, etc. Fleet Monitoring Control highly respects your attention to your personal information and provides you with ways to manage your personal information. You have the right to view, correct, manage, delete your information, and protect your privacy and security.

(2) Manage the shared information

Fleet Monitoring Control thank you for data updates, problem feedback and various ship images and content. Through Fleet Monitoring Control, you can make ship location error declaration, add new, ship information error declaration, ship picture sharing, upload route, port information sharing, company information, so as to help more users enjoy more accurate information.

When you publicly share any information in Fleet Monitoring Control products or services, anyone may view or access this information when using or not using Fleet Monitoring Control products or services, such as your photos and provided ship space, Chinese ship names, please avoid personal sensitive information and make careful decisions. Once the shared data is approved by Fleet Monitoring Control, then the final interpretation of these data belongs to Fleet Monitoring Control.

6. Your rights

In accordance with relevant Chinese laws, regulations and standards, and common practices in other countries and regions, we guarantee that you will exercise the following rights over your user information:

(1) Manage your personal information

Managing your personal information means that Fleet Monitoring Control collects the user's personal information stored, including the user's mobile phone number, user name, registration area, company name, contact information, contact address, etc. Fleet Monitoring Control highly respects your attention to your

personal information and provides you with ways to manage your personal information. You have the right to view, correct, manage, delete your information, and protect your privacy and security.

(2) Manage the shared information

Fleet Monitoring Control thank you for data updates, problem feedback and various ship images and content. Through Fleet Monitoring Control, you can make ship location error declaration, add new, ship information error declaration, ship picture sharing, upload route, port information sharing, company information, so as to help more users enjoy more accurate information.

When you publicly share any information in Fleet Monitoring Control products or services, anyone may view or access this information when using or not using Fleet Monitoring Control products or services, such as your photos and provided ship space, Chinese ship names, please avoid personal sensitive information and make careful decisions. Once the shared data is approved by Fleet Monitoring Control, then the final interpretation of these data belongs to Fleet Monitoring Control.

7. Your rights

In accordance with relevant Chinese laws, regulations and standards, and common practices in other countries and regions, we guarantee that you will exercise the following rights over your user information:

(I) Access to your user information

You have access to your user information except exceptions provided by laws and regulations. If you want to exercise access to the data, you can access the data by yourself by: click the web page or the upper right corner of the app-enter the personal center, access personal information

If you cannot access these user information through the above link, you can contact our wechat customer service at any time, or send an email to sales.china@aquametro-oil-marine.com.cn。We will reply to your access request within 3 days.

For other user information that you generate during the use of our products or services, we will provide you as long as we do not require much input. If you want to exercise data access, please email to sales.china@aquametro-oil-marine.com.cn.

(2) Correct your user information

When you find an error in our user information about you, you have the right to ask us to make corrections. You can request the correction as listed in the section of the (I) Access to your User Information

section. If you cannot correct these user information in the above way, you can use our wechat customer service contact at any time, or send an email to sales. china@aquametro-oil-marine.com.cn。 We will reply to your request for correction within 3 days.

(3) Delete your user information

- You can request us to delete the user information in the following situations:
- If our handling of user information violates laws and regulations;
- 2. If we collect and use your user information, without obtaining your consent;
- 3. If we process user information violates the agreement with you;
- 4. If you no longer use our products or services, or you cancel your account;
- 5. If we no longer provide you with products or services.

We will evaluate your deletion request and if satisfied, we will take steps. When you request us to delete, we may ask you to authenticate to secure the account. When you remove information from our services, because of the applicable laws and security techniques, we may not immediately remove the corresponding information from the backup system, we will securely store your information until the backup can be purged or anonymized.

(4) Change the scope of your authorized consent

Each business function needs some basic user information to complete (see "Part I" of this policy). You may give or withdraw your authorized consent at any time for the collection and use of user information.

When you withdraw your consent, we will not process the corresponding user information. Please also note that your revocation of authorization consent may lead to some consequences, such as we may be unable to continue to provide you with appropriate services or specific functions, but your decision to withdraw your consent will not affect previous user information processing based on your authorization.

(5) Automatic decision-making of the constraint information system

In some business functions, we may only make decisions based on non-manual automatic decision-making mechanisms, such as information systems, algorithms, etc.lf these decisions significantly affect your legitimate rights, you have the right to request our explanation, and we will also provide appropriate relief.

(6) In response to your above request

To be safe, you may need to provide a written request, or otherwise prove your identity. We may ask you to verify your identity before processing your request.

- For your reasonable request. We may reject requests that are unjustified, require excessive technical means (e. g., require new systems or fundamentally change existing practices), pose risks to the legitimate interests of others, or are very unrealistic. Please also understand that, for security reasons, relevant laws and regulations requirements, or technical limitations, we may not be able to respond to some of your requests, such as:
- 1. Related to the controller of user information to fulfill the obligations stipulated by laws and regulations;
- 2. Direct related to national security and national defense security;
- 3. Direct related to public safety, public health and major public interests;
- 4. Directly related to crime investigation, prosecution, trial and execution of judgment;
- 5. The user information controller has sufficient evidence to show that the user information subject has subjective malice or abuse of rights;
- 6. Only as to protect the major legitimate rights and interests of the user information subject or other individuals, but it is difficult to obtain my consent;
- 7. Responding to the request of the user information subject will cause serious damage to the legitimate rights and interests of the user information subject or other individuals and organizations;
- 8. Trade secrets are involved.

8. Protection of minors

We attach great importance to the protection of minors 'personal information. We will protect and deal with minors' information according to the provisions of relevant national laws and regulations.

For the minor user information collected with the consent of parents or guardians, we will only store, use or publicly disclose this information if necessary by law, parents or guardians to explicitly agree or protect the minors, otherwise we will try to delete the relevant data as soon as possible.

In view of the existing technology and business model, it is difficult to actively identify minors personal information, if you find we unknowingly or without confirmed guardian consent collected minors personal information, you can contact us, we will try to delete after discovery, if we find the above situation, we will promptly delete, the law requires us to keep except.

9 Applicable Law and dispute resolution

(1) Governing laws

The implementation, interpretation of this Policy and the settlement of disputes shall apply to the laws

of the People's Republic of China without regard to any conflict laws.

(2) Dispute settlement

Any dispute arising from the content or execution of the Agreement shall be settled by both parties

through friendly negotiation. If the negotiation fails, both parties agree to submit the arbitration to the China

Maritime Arbitration Commission and accept the arbitration rules. The award is final and the parties will

unconditionally perform the award.

10. Change and revision of this policy

Our privacy policy may be changed. We will not reduce your rights under this Privacy Policy without your

express consent. We will post any changes made to this policy on this page.

We will also provide a more significant notification of major changes. Significant changes mentioned

in this policy include, but are not limited to:

1. Our service model has changed significantly. Such as the purpose of processing the user

information, the type of the user information processed, and the use mode of the user information;

2. We have undergone major changes in terms of ownership structure and organizational

structure. Such as business adjustment, bankruptcy merger and acquisition caused by the owner change;

3. The main objects of user information sharing, transfer or public disclosure change;

4. Your rights to participate in user information processing and their exercise methods have

changed significantly;

5. When we are responsible for handling the user information security responsibility department,

contact information and complaint channels change;

6. When the user information security impact assessment report indicates that there is a high risk.

We will also file an old version of this policy for your review.

11. How to contact the Fleet Monitoring Control

If you have any questions, comments, or suggestions about the Fleet Monitoring Control Privacy

Policy, contact us by:

Company name: Aquametro Oil & Marine (Shanghai) Co., LTD

13

Address: Room 403, Floor 4, Building 1, No.508, Chuanhong Road, Pudong New Area, Shanghai

Email: sales.china@aquametro-oil-marine.com.cn

Tel.: 13724251381

开发者名称: 上海岸冕蕾科技有限公司 应用程序名称: Fleet Monitoring Control

Fleet Monitoring Control 隐私政策

版本发布日期: 2023 年 5 月 版本生效日期: 2023 年 5 月

引言

欢迎您使用 Fleet Monitoring Control 的产品和服务! Fleet Monitoring Control 深知用户信息对您的重要性,并会尽全力保护您的用户信息安全可靠。Fleet Monitoring Control 致力于维持您对我们的信任,恪守以下原则,保护您的用户信息: 权责一致原则、目的明确原则、选择同意原则、最少够用原则、确保安全原则、主体参与原则、公开透明原则等。同时,我们承诺,我们将按业界成熟的安全标准,采取安全的保护措施来保护您的用户信息和隐私安全,因此特制定《Fleet Monitoring Control 隐私政策》(以下简称"本政策")。本政策适用于您访问和使用 Fleet Monitoring Control 平台(包括但不限于 Fleet Monitoring Control APP,网站,公众号等)留存的信息。

请在使用我们的产品(或服务)前,仔细阅读并了解本隐私政策。

本政策将帮助您了解以下内容:

- 一、Fleet Monitoring Control 如何收集和使用您的用户信息
- 二、Fleet Monitoring Control 如何使用 Cookie 和同类技术
- 三、Fleet Monitoring Control 以及 Fleet Monitoring Control 接入的第三方如何共享、转让、公开披露你的用户信息
- 四、Fleet Monitoring Control 如何保护您的个人信息
- 五、Fleet Monitoring Control 如何管理您的个人信息
- 六、您的权利
- 七、未成年人保护
- 八、适用法律和争议解决
- 九、本政策的变更修订
- 十、如何联系 Fleet Monitoring Control

一、Fleet Monitoring Control 收集和使用您的用户信息

(一) 您使用 Fleet Monitoring Control 产品或服务过程中我们收集和使用的信息

我们仅会出于本政策所述的业务功能,收集和使用您的用户信息,收集用户信息的目的在于向您提供产品或服务,您有权自行选择是否提供该信息,但多数情况下,如果您不提供,我们可能无法向您提供相应的服务,也无法回应您遇到的问题。

为实现向您提供我们产品或服务的附加功能,您可选择授权我们收集、使用您的个人敏感信息。如您拒绝提供,您将无法正常使用相关附加功能或无法达到我们拟达到的功能效果,但并不会影响您正常使用我们产品或服务的基本功能。

在您注册 Fleet Monitoring Control 账户时,我们将收集您的手机号码,手机号码属于敏感信息,收集此类信息是为了用于验证身份。手机号码属于必要信息,如果您拒绝提供,将无法完成注册。在您使用我们的服务时,允许我们收集您自行向我们提供的或为向您提供服务所必要的信息包括:设备型号、操作系统、登录 IP 地址、接入网络的方式、类型和状态、网络质量数据、设备加速器(如重力感应设备)、操作日志、服务日志信息(如您在进行搜索、查看操作的记录、服务故障信息、引荐网址等信息)等日志信息,这类信息是为提供服务必须收集的基础信息。根据您的授权,我们可能打开位置、手机操作系统型号及版本、国际移动设备识别码、唯一设备识别码、机器 MAC 地址、手机任务列表、设备 SSID、相册访问权限。

要特别说明的是,获得以上信息是我们收集特定信息的必要而非充分条件。我们获得具体某一项敏感权限并不代表我们必然会收集您的相关信息;即使我们已经获得敏感权限,也仅在必要时、根据本隐私政策来收集您的相关信息。

您提供的上述信息,将在您使用本服务期间持续授权我们使用。在您停止使用服务时,我们将停止使用并删除上述信息。

我们保证会依法对收集后的用户信息进行去标识化或匿名化处理,对于无法单独或者与其他信息结合识别自然人个人身份的信息,不属于法律意义上的个人信息。如果我们将非个人信息与其他信息结合识别到您的个人身份时,或者

与您的个人信息结合使用时,我们会在结合使用期间,将此类信息作为您的个人信息按照本隐私政策对其进行处理和保护。

为了更好运营和改善我们的技术和服务,或出于商业策略的变化,当我们提供的产品或服务所需的用户信息收集、使用、处理超出上述范围或者要将收集到的用户信息用于本隐私政策未载明的其他用途,或当我们要将基于特定目的收集而来的信息用于其他目的时,我们会在获取用户信息后的合理期限内或处理用户信息前通知您,并获得您的授权同意。

(二) 信息的使用方式

- 1、在您登录 Fleet Monitoring Control 时,我们会获得您的手机号码、邮箱地址,并且会向您的手机上发送短信,或向您邮箱发送邮件。当您忘记账号密码时,我们会获取您的账号信息并且发送验证短信或邮件。当您购买船舶历史轨迹数据时,会获取您的信息,手机号等数据,购买完成后会向您的手机上发送短信。
- 2、获取用户信息,产生自定区域预警,用户根据需要,将相关的船舶编成编队或分组,针对分组船舶定制监控条件,定制报警和提醒判断条件,定制条件的设定均可以在图上操作,可视化完成方便用户操作。报警和提醒判断即对报警和提醒对象设定报警和提醒触发条件,当满足触发条件的情况发生时,即产生报警和提醒。
- 3、在您向 Fleet Monitoring Control 咨询客服服务时,Fleet Monitoring Control 将会获取您的微信号,以便与您建立联系,如果您没有微信号或无法使用微信,您将无法通过在线服务与 Fleet Monitoring Control 获得客服咨询,那么您可以通过拨打 Fleet Monitoring Control 客服咨询电话、QQ 群或发送电子邮箱与 Fleet Monitoring Control 取得联系。
- 4、在您使用我公司开发的平台支持多种形式的导入或生成计划航线时,会在您的电脑上弹出需要上传的航线文件选择,支持通过手动上传,专门邮箱接收等多种方式上传计划航线,会读取您电脑上的文件,利用航海数学原理,结合计划航线,进行航迹推算,或者在给定 ETA 情况下,结合计划航线推算船舶航速,给船舶航行决策提供参考。
- 5、在您使用我们平台一些增值功能和服务时,您将需要提供包括个人联络方式和公司信息,这些信息将用于确认用户身份并提供对应服务。如船舶估值功能,需要完善个人和公司信息,以便我们可以联系您开通更专业服务;认证服务商功能,是用于在我们平台上公开您公司的产品和服务,因此需要您提供清楚完整的公司信息,包括名称,公司类型、服务类型、服务港口、提供的服务、地址、联系人、手机号、电子邮箱等,简短的说明,用以确认使用者身份后公开显示,便于有需要的用户取得联系方式;此外,您如果需要在线申请发票,需要提供公司负责人联系方式,纳税人识别码,公司地址,开户行及账号等信息,这些信息主要用于签订合同与开具增值税发票。上述信息属于敏感信息。如您拒绝提供,您将无法使用对应的功能,但不影响您使用 Fleet Monitoring Control 的其他功能。
- 6、为了更好运营和改善我们的技术和服务,或出于商业策略的变化,当我们提供的产品或服务所需的用户信息收集、使用、处理超出上述范围或者要将收集到的用户信息用于本隐私政策未载明的其他用途,或当我们要将基于特定目的收集而来的信息用于其他目的时,我们会在获取用户信息后的合理期限内或处理用户信息前通知您,并获得您的授权同意。

(三) 征得授权同意的例外

• 请您理解,根据法律法规及相关国家标准,以下情形中,我们收集和使用您的用户信息无需征得您的授权同意:

- 1、与国家安全、国防安全直接相关的;
- 2、与公共安全、公共卫生、重大公共利益直接相关的;
- 3、与犯罪侦查、起诉、审判和判决执行等直接相关的;
- 4、出于维护您或其他个人的生命、财产等重大合法权益但又很难得到本人同意的;
- 5、所收集的您的用户信息是您自行向社会公众公开的;
- 6、从合法公开披露的信息中收集的您的用户信息,如合法的新闻报道、政府信息公开等渠道;
- 7、根据您的要求签订或履行合同所必需的;
- 8、用于维护软件及相关服务的安全稳定运行所必需的,例如发现、处置软件及相关服务的故障;
- 9、 个人信息控制者为新闻单位且其在开展合法的新闻报道所必需的;
- 10、学术研究机构基于公共利益开展统计或学术研究所必要,且对外提供学术研究或描述的结果时,对结果中所包含的个人信息进行去标识化处理的。
- 11、法律法规规定的其他情形。

以下是 Fleet Monitoring Control 地图权限对应的业务功能,调用权限的目的以及调用权限前向您询问的情况:

1. 权限描述: 定位

(1) 业务功能: 定位服务、标注位置

(2) 调用目的: 获取用户当前位置, 用于定位和标注位置

(3) 收集个人信息: 用户位置(4) 是否询问: 首次安装进行询问

2. 权限描述: 相机/照片

(1) 业务功能:上传船舶图片

(2) 调用目的: 实现拍照上传, 手机相册上传等功能需求

(3) 收集个人信息:船舶图片(4) 是否询问:调用相机功能询问

3. 权限描述: 系统版本

(1) 业务功能:操作系统版本、百度统计

(2) 调用目的: 查看应用版本号, 检查应用兼容性

(3) 收集个人信息: 设备标识编号(4) 是否询问: 不询问,自动获取

二、Fleet Monitoring Control 如何使用 Cookie 和同类技术

(-) Cookie

为确保网站正常运转,我们会在您的计算机或移动设备上存储名为 Cookie 的小数据文件。Cookie 通常包含标

识符、站点名称以及一些号码和字符。借助于 Cookie, 网站能够存储您的访问偏好数据。

我们不会将 Cookie 用于本政策所述目的之外的任何用途。您可根据自己的偏好管理或删除 Cookie。您可以清

除计算机上保存的所有 Cookie, 大部分网络浏览器都设有阻止 Cookie 的功能。

(二) 网站信标和像素标签

除 Cookie 外, 我们还会在网站上使用网站信标和像素标签等其他同类技术。例如, 我们向您发送的电子邮件可

能含有链接至我们网站内容的点击 URL。

如果您点击该链接,我们则会跟踪此次点击,帮助我们了解您的产品或服务偏好并改善客户服务。网站信标通常

是一种嵌入到网站或电子邮件中的透明图像。借助于电子邮件中的像素标签,我们能够获知电子邮件是否被打开。如果

您不希望自己的活动以这种方式被追踪,则可以随时从我们的寄信名单中退订。

(三) Do Not Track (请勿追踪)

很多网络浏览器均设有 Do Not Track 功能,该功能可向网站发布 Do Not Track 请求。目前,主要互联网标准组

织尚未设立相关政策来规定网站应如何应对此类请求。但如果您的浏览器启用了 Do Not Track, 那么我们的所有网站

都会尊重您的选择。

三、Fleet Monitoring Control 以及 Fleet Monitoring Control 接入的第三方如何共享、转让、

公开披露您的用户信息

(一) 接入的第三方平台

Fleet Monitoring Control 可能会与第三方合作提供相关的服务,在第三方平台分享信息。

Fleet Monitoring Control 应用嵌入第三方 SDK 说明:

1. SDK 名称: 微信开发工具包

(1) SDK 类别:第三方登陆

(2) 业务功能: 第三方登录分享

(3) 是否获取个人信息: 否

(4) 调用目的: 用户分享发到微信

2. SDK 名称: 百度移动统计

18

(1) SDK 类别:数据分析、云平台、辅助运营

(2) 业务功能:流量及访问统计(3) 是否获取个人信息:否

(4) 调用目的: 监控平台访问量情况

3. SDK 名称: 百度地图

(1) SDK 类别:生活服务、地图导航

(2) 业务功能: 地图导航定位

(3) 是否获取个人信息: 否

(4) 调用目的: 计算船舶距用户距离

(二) 共享

- Fleet Monitoring Control 不会与其他的任何公司、组织和个人分享您的用户信息,但以下情况除外:
- 1、在获取明确同意的情况下共享:获得您的明确同意后,我们会与其他方共享您的用户信息。
- 2、我们可能会根据法律法规规定,或按政府主管部门的强制性要求,对外共享您的用户信息。
- 3、与我们的关联公司共享:您的用户信息可能会与我们的关联公司共享。我们只会共享必要的用户信息,且
 受本隐私政策中所声明目的的约束。关联公司如要改变用户信息的处理目的,将再次征求您的授权同意。
- 4、与授权合作伙伴共享:仅为实现本政策中声明的目的,我们的某些服务将由授权合作伙伴提供。我们可能会与合作伙伴共享您的某些用户信息,以提供更好的客户服务和用户体验。我们仅会出于合法、正当、必要、特定、明确的目的共享您的用户信息,并且只会共享提供服务所必要的用户信息。为了更好运营和改善技术和服务,您同意我们和授权合作伙伴在符合相关法律法规的前提下可将收集的信息用于其他服务和用途。
- 以下列举了具体的授权合作伙伴,我们建议您阅读该第三方的隐私政策:
- 卫星 AIS 数据和 Dynamic-AIS 数据(船基)是由 Spire 公司授权
- AVCS Online 海图服务由 UKHO 授权
- Cmap 海图服务由 Jeppesen 授权
- 进港指南由 Findaport 授权
- 潮汐预报数据由国家海洋信息中心授权
- 船舶估值由 Weselmann 授权

(三) 转让

- Fleet Monitoring Control 不会将您的用户信息转让给任何公司、组织和个人,但以下情况除外:
- 1、在获取明确同意的情况下转让:获得您的明确同意后,我们会向其他方转让您的用户信息;
- 2、在涉及合并、收购或破产清算时,如涉及到用户信息转让,我们会再要求新的持有您用户信息的公司、组织继续受此隐私政策的约束,否则我们将要求该公司、组织重新向您征求授权同意。

(四) 公开披露

- 我们仅会在以下情况下,公开披露您的用户信息:
- 1、获得您明确同意后;
- 2、基于法律的披露:在法律、法律程序、诉讼或政府主管部门强制性要求的情况下,我们可能会公开披露您的用户信息。

(五) 共享、转让、公开披露信息时事先征得授权同意的例外

- 请您理解,根据法律法规及相关国家标准,以下情形中,我们共享、转让、公开披露您的用户信息无需征得您的授权同意:
- 1、与国家安全、国防安全直接相关的;
- 2、与公共安全、公共卫生、重大公共利益直接相关的;
- 3、与犯罪侦查、起诉、审判和判决执行等直接相关的;
- 4、出于维护您或其他个人的生命、财产等重大合法权益但又很难得到本人同意的;
- 5、您自行向社会公众公开的信息;
- 6、从合法公开披露的信息中收集的,如合法的新闻报道、政府信息公开等渠道。

四、Fleet Monitoring Control 如何保护您的个人信息

- (一) 我们已使用符合业界标准的安全防护措施保护您提供的用户信息,防止数据遭到未经授权的访问、公开披露、使用、修改、损坏或丢失。我们会采取一切合理可行的措施,保护您的用户信息。例如,在您的浏览器与"服务"之间交换数据时受 SSL 加密保护;我们同时对网站提供 https 安全浏览方式;我们会使用加密技术确保数据的保密性;我们会使用受信赖的保护机制防止数据遭到恶意攻击;我们会部署访问控制机制,确保只有授权人员才可访问用户信息;以及我们会举办安全和隐私保护培训课程,加强员工对于保护用户信息重要性的认识。
- (二) 您使用 Fleet Monitoring Control 产品或服务期间,我们将持续为您保存,除非您自主提出请求删除和注销账户;当我们产品和服务停运或发生变更时,我们将以推送,公告等形式通知您,并在合理的期限内删除您的个人信息或进行匿名处理。
- (三) 在使用 Fleet Monitoring Control 产品和服务时,您的个人信息将储存于中华人民共和国境内,如需跨境传输或将信息存放在境外,我们将会根据相应法律法规处理,单独征得您的授权和同意,并告知您的个人信息将存放在境外的国家和地区。
- (四) 我们会采取一切合理可行的措施,确保未收集无关的用户信息。我们只会在达成本政策所述目的所需的期限内保留您的用户信息,除非需要延长保留期或受到法律的允许。
- (五) 互联网并非绝对安全的环境,而且电子邮件、即时通讯、及与其他用户的交流方式并未加密,我们强烈建议您不要通过此类方式发送用户信息。

- (六) 互联网环境并非百分之百安全, Fleet Monitoring Control 将尽力确保您发送给我们的任何信息的安全性。即使我们做出了很大努力,采取了一切合理且必要的措施,仍然有可能无法杜绝您的用户信息被非法访问、被非法盗取,被非法篡改或毁坏,导致您的合法权益受损,请您理解信息网络的上述风险并自愿承担。
- (七)在不幸发生用户信息安全事件后,我们将按照法律法规的要求,及时向您告知:安全事件的基本情况和可能的影响、我们已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。我们将及时将事件相关情况以邮件、信函、电话、推送通知等方式告知您,难以逐一告知用户信息主体时,我们会采取合理、有效的方式发布公告。同时,我们还将按照监管部门要求,主动上报用户信息安全事件的处置情况。

五、Fleet Monitoring Control 如何管理您的个人信息

(一) 管理您的个人信息

管理您的个人信息是指,Fleet Monitoring Control 收集储存到的用户个人信息,包含用户手机号,用户名,注册地区,公司名称,联系方式,联系地址等,Fleet Monitoring Control 非常尊重您对个人信息的关注,并为您提供了管理个人信息的方法。您有权利查看、更正、管理、删除自己的信息并保护自己的隐私和安全。

(二) 管理分享的信息

Fleet Monitoring Control 非常感谢您向我们提供的数据更新、问题反馈以及各种船舶图片与内容的贡献。您可以通过 Fleet Monitoring Control 进行船舶位置地点报错、标注新增、船舶信息资料报错,船舶图片共享,上传航线,港口信息共享,公司信息等,以帮助更多的用户享受到更多精准的信息。

当您在 Fleet Monitoring Control 的产品或服务中公开分享任何信息时,任何人都可能在使用或未使用 Fleet Monitoring Control 产品或服务时查看或访问这些信息,如您在 Fleet Monitoring Control 中上传的照片和提供的船位,中文船名等数据,请您共享信息时尽量避免个人敏感信息,并审慎决策,一旦这些共享的数据,通过 Fleet Monitoring Control 的审核,那么这些数据的最终解释权归 Fleet Monitoring Control 所有。

六、您的权利

按照中国相关的法律、法规、标准,以及其他国家、地区的通行做法,我们保障您对自己的用户信息行使以下权利:

(一) 管理您的个人信息

管理您的个人信息是指,Fleet Monitoring Control 收集储存到的用户个人信息,包含用户手机号,用户名,注册地区,公司名称,联系方式,联系地址等,Fleet Monitoring Control 非常尊重您对个人信息的关注,并为您提供了管理个人信息的方法。您有权利查看、更正、管理、删除自己的信息并保护自己的隐私和安全。

(二) 管理分享的信息

Fleet Monitoring Control 非常感谢您向我们提供的数据更新、问题反馈以及各种船舶图片与内容的贡献。您可以通过 Fleet Monitoring Control 进行船舶位置地点报错、标注新增、船舶信息资料报错,船舶图片共享,上传航线,港口信息共享,公司信息等,以帮助更多的用户享受到更多精准的信息。

当您在 Fleet Monitoring Control 的产品或服务中公开分享任何信息时,任何人都可能在使用或未使用 Fleet Monitoring Control 产品或服务时查看或访问这些信息,如您在 Fleet Monitoring Control 中上传的照片和提供的船位,中文船名等数据,请您共享信息时尽量避免个人敏感信息,并审慎决策,一旦这些共享的数据,通过 Fleet Monitoring Control 的审核,那么这些数据的最终解释权归 Fleet Monitoring Control 所有。

七、您的权利

按照中国相关的法律、法规、标准,以及其他国家、地区的通行做法,我们保障您对自己的用户信息行使以下权利:

(一) 访问您的用户信息

您有权访问您的用户信息,法律法规规定的例外情况除外。如果您想行使数据访问权,可以通过以下方式自行访问: 点击网页或者 app 右上角头像-进入个人中心,访问个人信息

如果您无法通过上述链接访问这些用户信息,您可以随时与我们的微信客服联系,或发送电子邮件至 sales.china@aquametro-oil-marine.com.cn。我们将在 3 天内回复您的访问请求。

对于您在使用我们的产品或服务过程中产生的其他用户信息,只要我们不需要过多投入,我们会向您提供。如果您想行使数据访问权,请发送电子邮件至 sales.china@aquametro-oil-marine.com.cn。

(二) 更正您的用户信息

当您发现我们处理的关于您的用户信息有错误时,您有权要求我们作出更正。您可以通过"(一)访问您的用户信息"中罗列的方式提出更正申请。 如果您无法通过上述方式更正这些用户信息,您可以随时使用我们的微信客服联系,或发送电子邮件至 sales.china@aquametro-oil-marine.com.cn。我们将在 3 天内回复您的更正请求。

(三) 删除您的用户信息

- 在以下情形中,您可以向我们提出删除用户信息的请求:
- ▶ 1、如果我们处理用户信息的行为违反法律法规;

- 2、如果我们收集、使用您的用户信息,却未征得您的同意;
- 3、如果我们处理用户信息的行为违反了与您的约定;
- 4、如果您不再使用我们的产品或服务,或您注销了账号;
- 5、如果我们不再为您提供产品或服务。

我们将会根据您的删除请求进行评估,若满足相应规定,我们将会采取相应步骤进行处理。当您向我们提出删除 请求时,我们可能会要求您进行身份验证,以保障账户的安全。当您从我们的服务中删除信息后,因为适用的法律和安 全技术,我们可能不会立即从备份系统中删除相应的信息,我们将安全存储您的信息直到备份可以清除或实现匿名化。

(四) 改变您授权同意的范围

每个业务功能需要一些基本的用户信息才能得以完成(见本政策"第一部分")。对于用户信息的收集和使用,您可以随时给予或收回您的授权同意。

当您收回同意后,我们将不再处理相应的用户信息。同时也请您注意,您撤销授权同意可能会导致某些后果,例 如我们可能无法继续为您提供相应的服务或特定的功能,但您收回同意的决定,不会影响此前基于您的授权而开展的用户信息处理。

(五) 约束信息系统自动决策

在某些业务功能中,我们可能仅依据信息系统、算法等在内的非人工自动决策机制作出决定。如果这些决定显著 影响您的合法权益,您有权要求我们作出解释,我们也将提供适当的救济方式。

(六)响应您的上述请求

为保障安全,您可能需要提供书面请求,或以其他方式证明您的身份。我们可能会先要求您验证自己的身份,然后再处理您的请求。

- 对于您合理的请求,我们将视情况收取一定成本费用。对于那些无端重复、需要过多技术手段(例如,需要 开发新系统或从根本上改变现行惯例)、给他人合法权益带来风险或者非常不切实际的请求,我们可能会予以拒绝。也 请您理解,出于安全保障的考虑、相关法律法规的要求或技术上的限制,对于您的某些请求我们可能无法做出响应,例 如以下情形:
- 1、与用户信息控制者履行法律法规规定的义务相关的;
- 2、与国家安全、国防安全直接相关的;
- 3、与公共安全、公共卫生、重大公共利益直接相关的;
- 4、与犯罪侦查、起诉、审判和执行判决等直接相关的;
- 5、用户信息控制者有充分证据表明用户信息主体存在主观恶意或滥用权利的;

- 6、出于维护用户信息主体或其他个人的生命、财产等重大合法权益但又很难得到本人同意的;
- 7、响应用户信息主体的请求将导致用户信息主体或其他个人、组织的合法权益受到严重损害的;
- 8、涉及商业秘密的。

八、未成年人保护

我们非常重视未成年人个人信息的保护,我们将根据国家相关法律法规的规定保护、处理未成年人的信息。

对于经父母或监护人同意而收集未成年人用户信息的情况,我们只会在受到法律允许、父母或监护人明确同意或者保护未成年人所必要的情况下储存、使用或公开披露此信息,否则我们会设法尽快删除相关数据。

鉴于现有技术和业务模式的限制,我们很难主动识别未成年人的个人信息,如果您发现我们在不知情的情况下或在未事先获得可证实的监护人同意的情况下收集了未成年人的个人信息,您可以及时联系我们,我们将在发现后设法及时删除,如果我们自己发现前述情形的,我们也会及时删除,法律要求我们保留的除外。

九、适用法律和争议解决

(一) 适用法律

本政策的执行、解释及争议的解决均适用中华人民共和国法律,且不考虑任何冲突法。

(二) 争议解决

双方就本协议内容或其执行发生任何争议,双方应尽量友好协商解决;协商不成时,双方同意向中国海事仲裁委员会提交仲裁并接受其仲裁规则。该仲裁裁决是终局的,双方将无条件地履行该仲裁裁决。

十、本政策的变更修订

我们的隐私政策可能变更。未经您明确同意,我们不会削减您按照本隐私政策所应享有的权利。我们会在本页面 上发布对本政策所做的任何变更。

- 对于重大变更,我们还会提供更为显著的通知。本政策所指的重大变更包括但不限于:
- 1、我们的服务模式发生重大变化。如处理用户信息的目的、处理的用户信息类型、用户信息的使用方式等;
- 2、我们在所有权结构、组织架构等方面发生重大变化。如业务调整、破产并购等引起的所有者变更等;
- 3、用户信息共享、转让或公开披露的主要对象发生变化;
- 4、您参与用户信息处理方面的权利及其行使方式发生重大变化;
- 5、我们负责处理用户信息安全的责任部门、联络方式及投诉渠道发生变化时;

• 6、用户信息安全影响评估报告表明存在高风险时。

我们还会将本政策的旧版本存档, 供您查阅。

十一、如何联系 Fleet Monitoring Control

如果您对《Fleet Monitoring Control 隐私政策》有任何疑问、意见或建议,通过以下方式与我们联系:

公司名称: 上海岸冕蕾科技有限公司

公司地址:上海市浦东新区川宏路 508 号 1 幢 4 层 403 室

电子邮件: sales.china@aquametro-oil-marine.com.cn

电话: 13724251381