

## PIPL 隐私政策

生效日期: October 31, 2021

本隐私政策（“政策”）适用于由 Cricut, Inc. 及其子公司和附属公司（“公司”、“我们”、“我们的”或“我们”）通过其网站、产品和服务（“服务”）进行的个人信息处理，受中华人民共和国（“中国”）个人信息保护法的约束。它描述了我们如何收集、使用和披露此类个人信息、您对个人信息的权利和选择，以及如果您有任何问题或疑虑，如何联系我们。

### 1. 我们收集的个人信息

在本政策中，“个人信息”是指与已识别或可识别个人有关的任何信息。我们可能会从下述各种来源收集有关您的个人信息。

#### 您提供的信息

- **帐户信息。**如果您创建帐户以使用我们的服务，我们将通过该帐户收集与其创建和使用我们的服务相关的个人信息。注册时，您或会向我们提供您的姓名、电子邮件地址、密码、手机号码、兴趣和其他帐户信息。
- **通讯。**当您通过联系表格、电子邮件或其他方式与我们联系时，您向我们提供了个人信息，例如您的姓名和联系方式，以及我们通信的内容、日期和时间。
- **职业。**如果您向我们申请工作，您或会向我们提供您的简历、姓名、联系方式和任何其他相关信息。如果您成为员工，我们可能会收集其他信息，例如您的紧急联系人、受益人选择以及其他用于就业、薪资和福利目的的相关信息，并且我们可能会收集某些敏感的个人信息，例如生物识别数据以进行身份验证或金融信息。
- **支援信息。**当您请求技术支援服务时，我们将处理您的个人信息，例如您的姓名和您用来联系我们的联系方式，以及有关您请求支援的原因的信息，以及您在这种情况下可能提供的任何其他信息。
- **上文第 1 节中以英文描述的其他类型的个人信息**

在适用的情况下，我们可说明您是否以及为什么必须向我们提供您的个人信息，以及不这样做的后果。例如，您可能需要披露某些个人信息，以使我们能够向您提供服务。

我们的服务不预期由不满十四周岁未成年人使用。

#### 从其他来源收集的信息

- **第三方。**我们可能会从第三方（例如 社交媒体平台、推荐合作伙伴、第三方广告商和其他实体）获取有关您的个人信息。该信息可能包括源自 cookie 和网络信标等技术的信息

· 包括您的 IP 地址、您的 ISP、您用于访问我们网站的浏览器，以及在某些情况下，您是否安装了 Flash（例如 Google 通过 Google AdSense 计划）和其他类似信息

### 我们通过自动化方式收集的信息

- **社交媒体。** 我们可能会通过社交媒体工具、小部件或插件，以将您连接到您的社交媒体帐户的方式收集个人信息。这些功能可能允许您通过您的社交媒体帐户登录、共享链接或直接发布到您的社交媒体帐户。当您访问包含此类工具或插件的网站时，社交媒体或其他服务提供商可能会获悉您的访问。您与这些工具的互动受相应社交媒体平台的隐私政策约束。
- **Cookies。** 我们可能会通过 cookies 和类似技术收集个人信息（更多有关资料，请参阅本政策的第 3 部分）。

## 2. 我们如何使用个人信息

我们将收集的个人信息用于以下目的：

- **提供服务，** 包括运营、维护、支援和提供我们的服务。
- **与您沟通，** 包括出于行政目的与您联系（例如，提供您请求的服务和信息或回复评论和问题）或向您发送营销通讯，包括与由我们提供产品和服务相关的促销和活动的更新。
- **个性化，** 包括为您定制我们的服务并向您提供最相关的营销和广告材料。
- **客户和供应商关系管理，** 包括跟踪电子邮件、电话以及您作为我们的客户或供应商采取的其他行动。
- **汇总和匿名化。** 我们可能会汇总或匿名化个人信息，并将所得信息用于统计分析或其他目的。
- **行政和法律，** 例如应对行政问题或捍卫我们的合法权利以及遵守中国法律允许的我们的法律义务和内部政策。
- **自动化决策。** 我们使用自动化方法处理您的个人信息，以帮助确定我们如何为您提供服务。
  - **概括而言，** 这涉及出于地理定位或个性化目的使用 cookie、网络信标和其他信息。这使我们能够对我们的产品进行地理定位和个性化（例如，向美国境内的某人展示美国广告），以及根据人们访问的特定网站展示某些广告（即，向美国境内的某个人展示某些广告购买定制 T 恤的人）。

## 3. 处理个人信息的法律依据

我们依靠多种法律依据来处理您的个人信息，包括：

- **同意。** 您可能已同意我们使用您的个人信息，例如向您发送电子营销通讯或使用某些 cookies 您可以随时按照本政策第 10 条中的说明与我们联系以撤回您的同意。
- **合同。** 我们需要您的个人信息来为您提供我们的服务并回复您的询问。

- **法律。**我们可能有法律义务在必要时处理您的个人信息，以履行法定职责和责任或法定义务，例如遵守税务和会计义务。
- **公共利益。**我们也可能在必要时处理您的个人信息，以应对突发的公共卫生事件或保护个人的生命和健康，或其财产安全，或在紧急情况下。
- **公共信息。**如果您已将其公开，我们可能会处理您的个人信息。在这种情况下，我们只会在合理的范围内处理此类个人信息。如果我们对此类个人信息的处理可能对您产生重大影响，我们将在进行此类处理之前征得您的同意。您也可以按照本政策第 10 节所述联系我们，拒绝我们处理您公开的个人信息。

#### **4. 我们如何披露个人信息**

我们可能会在以下情况下披露您的个人信息：

- **组实体。**我们可能会向我们的附属公司和子公司披露有关您的个人信息。
- **服务提供商。**我们与第三方合作提供托管、维护和支援等服务。作为向我们提供这些服务的一部分，这些第三方可能会访问或处理您的个人信息，但他们禁止将您的个人信息用于自己的目的。
- **法律。**我们可能会在有必要履行适用法律规定的职责和义务时披露您的个人信息。
- **公共帖子。**您自愿选择发布到我们服务的可公开访问区域的任何信息都将提供给有权访问该内容的任何人。
- **匿名信息。**已匿名化的个人信息不能再与个人相关联。我们可以出于任何目的使用和披露匿名信息，除非适用法律禁止我们这样做。
- **合并。**作为任何合并、收购、债务融资、资产出售或类似交易的一部分，以及在发生资不抵债、破产或接管，我们的用家的信息(包括个人信息)可能披露或转移给收购方、继承人或承让人，其中信息作为我们的业务资产之一转移给一个或多个第三方。在这种情况下，我们会通知您个人信息接收者的姓名以及如何联系该接收者。接收者将继续履行本政策中概述的 Cricut, Inc. 的职责。如果他们使用您的个人信息的方式发生任何变化，接收者将根据适用法律的规定通知您此类变化。

#### **5. 您的权利和选择**

根据适用法律的规定并受此类法律的任何限制，您拥有以下权利：

- **访问和便携性。**您可以要求我们向您提供我们维护的有关您的个人信息的副本，并要求提供有关其处理的某些信息。在某些情况下，您可要求我们将您的个人信息直接转移到另一个组织。

- **更正。**如果您认为我们处理的您的个人信息不准确或不完整，您可以要求我们更正或补充它。
- **删除。**在某些情况下，您可视情况要求匿名或删除您的个人信息。
- **同意撤回。**您可以随时免费撤回您之前就处理您的个人信息向我们提供的任何同意。我们将在未来应用您的偏好。这不会影响您撤回同意前处理的合法性。

您可以通过登录您的 Cricut 帐户并选择“删除帐户”来行使您的删除权，并且您可以通过发送电子邮件至 [privacyrequest@cricut.com](mailto:privacyrequest@cricut.com) 来行使任何其他权利。请注意，适用法律包含对这些权利中的每一项的某些例外和限制。如果我们不同意您的权利请求，我们将解释这样做的原因。在您行使这些权利之前，我们还需要验证您的身份，以确保您的个人信息不会被不当披露。

## 6. 国际数据传输

出于业务或其他有效目的的需要，我们可能会将您的个人信息转移到中国境外。个人信息可能会转移到美国、加拿大、欧洲或 Cricut 保持企业存在的其他地区。如果我们这样做，我们将遵守有关个人信息保护的适用数据保护法律。

## 7. 数据安全和数据保留

我们使用物理、管理和技术保护措施，旨在提高我们收集、维护和以其他方式处理的个人信息的完整性和安全性。

当我们处理的目的不再需要您的个人信息时，我们会删除或匿名化您的个人信息，除非法律要求我们将其保留更长的时间。在确定保留期限时，我们选择实现处理目的所需的最短保留期限，并考虑各种标准，例如提供给您的产品或服务的类型、我们与您的关系的性质和长度、强制性保留期限和适用的诉讼时效。

## 8. 第三方服务

我们的服务可能包含第三方提供的网站和服务的功能或链接。您通过这些网站或服务提供的任何信息都直接提供给这些第三方运营商，并受其隐私政策的约束，即使通过我们的服务访问也是如此。我们鼓励您在向他们提供您的个人信息之前了解这些第三方的政策。

## 9. 本政策的变更和更新

我们可不时更新本政策，以反映我们隐私惯例的变化。我们将遵守有关此类变更通知的适用法律和法规。

## 10. 我们的联系方式

Cricut, Inc. 是负责处理您的个人信息的实体。如果您对本政策、我们的隐私惯例有任何问题或意见，或者如果您想就您的个人信息行使您的权利，请通过我们的请求门户与我们联系。通过电子邮件发送至 [privacyrequest@cricut.com](mailto:privacyrequest@cricut.com) 或邮寄至：

Cricut, Inc.  
Attn: Legal Counsel - Privacy  
10855 S. River Front Parkway  
South Jordan, UT 84095  
USA

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## PIPL Privacy Policy

*Effective Date: October 31, 2021*

This Privacy Policy (the “**Policy**”) applies to the handling of Personal Information, subject to the Personal Information Protection Law of the People’s Republic of China (“**China**”), by Cricut, Inc. and its subsidiaries and affiliates (“**Company**,” “**we**,” “**our**,” or “**us**”) through its website, products, and services (the “**Services**”). It describes how we collect, use, and disclose such Personal Information, your rights and choices with respect to your Personal Information, and how you can contact us if you have any questions or concerns.

### 2. Personal Information We Collect

In this Policy, “**Personal Information**” means any information relating to an identified or identifiable individual. We may collect Personal Information about you from various sources described below.

#### Information Provided by You

- **Account Information.** If you create an account to use our Services, we collect Personal Information related to its creation and the usage of our Services via this account. When you sign up, you may provide us with your name, email address, password, mobile phone number, interests, and other account information.
- **Communications.** When you contact us via a contact form, email, or other means, you provide us with Personal Information, such as your name and contact details, and the content, date, and time of our communications.
- **Careers.** If you apply for a job with us, you may provide us with your resume, name, contact details, and any other relevant information. If you become an employee, we may collect additional information, such as your emergency contacts, beneficiary selections, and other relevant information for employment, payroll, and benefit purposes, and we may collect certain sensitive Personal Information such as biometric data for identity verification or financial information.
- **Support Information.** When you request technical support services, we will handle your Personal Information such as your name and the contact details you use to contact us, as well as information about the reasons for your support request, and any additional information you may provide in that context.

- *Geographic location.* Upon account creation or through your use of Cricut services, we may collect your geographic location, which may include city, state, or other location. If you purchase a product or service from us, we may collect your name, contact details, and shipping information.
- *Credit card or payment information.* If you purchase a product or service from us, we may collect your name, address, and relevant credit card information or other payment information details.
- *Identifying information on projects in Design Space® including photo, birthdays, or important dates.* When using our website, services, or Design Space® software, any information you provide in your projects (including photos, birthdays, important dates, text, or other images), these will be collected and stored.
- *User activity information.* We collect information about user activities on our website and services. For example, our website servers automatically collect and log “clickstream data” for all visitors, such as IP addresses (which are numerical numbers that are automatically assigned to users’ computers and mobile devices when they are surfing the Internet), page requests, pages visited, content viewed, clicks and search queries made, etc. We also use cookies and web beacons to collect user activity information on our website. This information may include your activity on Design Space® such as selections, design history, search queries, etc. To the extent we use User Activity Information in a manner that identifies a specific user individually (e.g., if we link or associate such information with name or address), it will be treated as Personal Information. Otherwise, user activity information will be treated as aggregate and anonymous information.
- *Other personal information you may provide when using Cricut’s website or services.* When prompted or provided, any other personal information you may provide on our website or services will be collected.

Where applicable, we may indicate whether and why you must provide us with your Personal Information as well as the consequences of failing to do so. For example, it may be necessary for you to disclose certain Personal Information in order for us to provide the Services to you. Our Services are not intended for use by children under the age of 14.

#### Information Collected from Other Sources

- *Third Parties.* We may obtain Personal Information about you from third parties such as social media platforms, referral partners, third-party advertisers and other entities. This information may include information that stems from technology such as cookies and web beacons, including your IP address, your ISP, the browser you used to visit our website, and in some cases, whether you have Flash installed (such as the case with Google through the Google AdSense program) and other similar information.

#### Information We Collect by Automated Means

- *Social media.* We may collect Personal Information via social media tools, widgets, or plug-ins to connect you to your social media accounts. These features may allow you to sign in through your social media account, share a link, or post directly to your social media account. When you visit a website that contains such tools or plugins, the social media or other service provider may learn of your visit. Your interactions with these tools are governed by the privacy policies of the corresponding social media platforms.
- *Cookies.* We may collect Personal Information via cookies and similar technologies (see section 3 of this Policy for more information).

### **3. How We Use Personal Information**

We use the Personal Information we collect for the following purposes:

- *Providing Services*, including to operate, maintain, support, and provide our Services.
- *Communicating with You*, including to contact you for administrative purposes (e.g., to provide services and information that you request or to respond to comments and questions) or to send you marketing communications, including updates on promotions and events, relating to products and services offered by us.
- *Personalization*, including to customize our Services to you and provide you with the most relevant marketing and advertising materials.
- *Customer and Vendor Relationship Management*, including to track emails, phone calls, and other actions you have taken as our customer or vendor.
- *Aggregation and anonymization*. We may aggregate or anonymize Personal Information and use the resulting information for statistical analysis or other purposes.
- *Administrative and Legal*, such as to address administrative issues or to defend our legal rights and to comply with our legal obligations and internal policies as permitted by PRC law.
- *Automated Decision-making*. We handle your Personal Information using automated means to help make decisions about how we provide the Services to you. At a high level, this involves using cookies, web beacons, and other information for geotargeting or individualization purposes. This allows us to geotarget and individualize our offerings (e.g., showing American ads to someone in the United States) as well as show certain ads based on specific websites a person visits (i.e, showing heat press ads to someone who shops for custom t-shirts).

### **4. Legal Bases for the Handling of Personal Information**

We rely on various legal bases to handle your Personal Information, including:

- *Consent*. You may have consented to the use of your Personal Information, for example to send you electronic marketing communications or for the use of certain cookies. You may withdraw your consent at any time by contacting us as described in Section 10 of this Policy.
- *Contract*. We need your Personal Information to provide you with our Services and to respond to your inquiries.
- *Legal*. We may have a legal obligation to handle your Personal Information when necessary to fulfill statutory duties and responsibilities or statutory obligations, for example to comply with tax and accounting obligations.
- *Public Interest*. We may also handle your Personal Information when necessary to respond to sudden public health incidents or protect individuals' lives and health, or the security of their property, under emergency conditions;.

### **5. How We Disclose Personal Information**

We may disclose Personal Information about you in the following circumstances:

- *Group Entities*. We may disclose Personal Information about you to our affiliates and subsidiaries.

- *Service Providers.* We work with third parties to provide services such as hosting, maintenance, and support. These third parties may have access to or handle your Personal Information as part of providing those services to us, but they are prohibited from using your Personal Information for their own purposes.
- *Legal.* We may disclose your Personal Information when it is necessary to fulfill our duties and obligations under applicable law.
- *Public Posts.* Any information that you voluntarily choose to post to a publicly accessible area of our Services will be available to anyone who has access to that content.
- *Anonymized Information.* Personal Information that has been anonymized can no longer be linked to an individual. We may use and disclose anonymized information for any purpose, unless we are prohibited from doing so under applicable law.
- *Merger.* Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets. In such a scenario, we will notify you of the name of the personal information recipient and how to contact such recipient. The recipient will continue to fulfill the duties of Cricut outlined in this Policy. If any changes are made to how they use your Personal Information, the recipient will notify you of such changes as provided by applicable laws.

## 6. Your Rights and Choices

As provided under applicable law and subject to any limitations in such law, you have the following rights:

- *Access and Portability.* You may ask us to provide you with a copy of the Personal Information we maintain about you and request certain information about its handling. In certain situations you may ask us to transfer your Personal Information to another organization directly.
- *Correction.* If you believe your Personal Information we handle is inaccurate or incomplete, you may ask us to correct or complete it.
- *Deletion.* In certain situations you may ask to have your Personal Information anonymized or deleted, as appropriate.
- *Consent Withdrawal.* You may withdraw any consent you previously provided to us regarding the handling of your Personal Information at any time and free of charge. We will apply your preferences going forward. This will not affect the lawfulness of the handling before you withdrew your consent.

You may exercise your right to Deletion by logging into your Cricut account and selecting “Delete Account”, and you may exercise any other rights by emailing us at [privacyrequest@cricut.com](mailto:privacyrequest@cricut.com). Note that applicable laws contain certain exceptions and limitations to each of these rights. If we do not grant your rights request, we will explain the reason for doing so. We will also need to verify your identity before you exercise these rights to ensure that your Personal Information is not inappropriately disclosed.

## 7. International Data Transfers

We may transfer your Personal Information outside of China when necessary for business or other valid purposes. Personal Information may be transferred to the United States of America,



Canada, Europe, or other areas where Cricut maintains a corporate presence. If we do so, we will comply with applicable data protection laws regarding the protection of Personal Information.

## **8. Data Security and Data Retention**

We use physical, managerial, and technical safeguards that are designed to improve the integrity and security of Personal Information that we collect, maintain, and otherwise handle.

We delete or anonymize your Personal Information when it is no longer necessary for the purposes for which we handle it, unless we are required by law to keep it for a longer period. When determining the retention period, we select the shortest retention period necessary to achieve the purpose of the handling and take into account various criteria, such as the type of products or services provided to you, the nature and length of our relationship with you, mandatory retention periods, and applicable statutes of limitations.

## **9. Third-Party Services**

Our Services may contain features or links to websites and services provided by third parties. Any information you provide via these websites or services is provided directly to these third-party operators and is subject to their privacy policies, even if accessed through our Services. We encourage you to learn about these third parties' policies before providing them with your Personal Information.

## **10. Changes and Updates to this Policy**

We may update this Policy from time to time to reflect changes in our privacy practices. We will follow applicable laws and regulations regarding notification of such changes.

## **11. Our Contact Information**

Cricut is the entity responsible for the handling of your Personal Information. If you have any questions or comments about this Policy, our privacy practices, or if you would like to exercise your rights with respect to your Personal Information, please contact us by email at [privacyrequest@cricut.com](mailto:privacyrequest@cricut.com) or by mail at:

Cricut, Inc.  
Attn: Legal Counsel - Privacy  
10855 S. River Front Parkway  
South Jordan, UT 84095  
USA