

# LPS Online Privacy Statement

LPS, a Lenovo company, recognizes that privacy is of great importance to individuals everywhere including our clients, employees, website visitors, product users. This is why the responsible use and protection of the confidentiality and privacy of information under our care is a core LPS value.

Please review this Online Privacy Statement (“**Statement**”) to learn about how we collect, use, share and protect the personal information that we have obtained. If you have any further questions or concerns, please feel free to reach us at [privacy@lenovo.com](mailto:privacy@lenovo.com).

## About this Statement

This Statement was last updated on 5 July 2024.

### What this Statement applies to

**Your privacy is important to LPS.** This Statement applies to personal information collected through the website owned and operated by LPS and its subsidiaries and certain offline services maintained by LPS or our service providers and partners. This Statement describes the information practices for the LPS website, including what types of personal information are collected, how LPS uses information and for what purposes; with whom information is shared with; and how LPS protects confidential information and individual privacy. It also describes your choices regarding use, access, correction, and deletion of your personal information, among other topics. In addition, this Statement addresses personal information collection and use by LPS in certain other (including offline) contexts, such as marketing, newsletters, events, and customer service and support.

### What this Statement does not apply to

The LPS website may contain links to other websites, some of which are not owned or controlled by LPS. LPS is not responsible for the privacy practices or the content of those other websites. Some of our web pages use framing techniques to serve content from suppliers or partners while preserving the look and feel of our site.

### Changes to this Statement

If we make a change to this Statement, we will make previous versions available so that you can see when changes occurred and what they are. If we make any material changes to this Statement, we will notify you by means of a notice on our website at the time the change becomes effective. Where applicable data protection laws require us, we will also seek your consent to any changes that affect how we use or transfer your personal information. We encourage you to review this Statement periodically for the latest information on our privacy practices.

Our Statement below was recently updated. [Review previous version.](#)

## What legal grounds does LPS rely on to use your personal information?

The applicable data privacy laws allow us to process personal information, so long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

- **Performance of a contract:** This is when the processing of your personal information is necessary in order to perform our obligations under a contract entered with you;
- **Legal obligation:** This is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- **Legitimate interests:** We may process information about you where it is in our legitimate interest in running a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests; or
- **Your consent:** We may occasionally ask you for specific and/or separate permission to process some of your personal information, and in such scenarios where we rely on consent as our legal ground, we will only process your personal information to the extent you agree for us in doing so.
- **Other applicable legal grounds:** We may also rely on other legal grounds or legal principles of the applicable data privacy laws, depending on your location and how you interact with LPS, to collect and process your personal information. *LPS only collects "sensitive" personal information when the relevant individuals voluntarily provide us with this information or where such information is required or permitted to be collected by the applicable law. Sensitive personal information includes personal information regarding a person's race, ethnicity, political beliefs, trade union membership, religious or similar beliefs, physical or mental health, sexual orientation, criminal records, biometric data, specific identity, health data, financial accounts, and individual whereabouts location tracking. Please use your discretion when providing sensitive information to LPS. Under any circumstances, **you should not provide yours or any third parties' sensitive personal information to LPS unless we shall separately notify you (and these third parties) and you (and these third parties) have given us your (and these third parties') explicit consent for LPS to use or process your (and these third parties') sensitive personal information for legitimate and necessary business purposes and you (and these third parties) have also consented for us to the transfer and store such sensitive personal information in LPS databases. If you have any questions about whether the provision of sensitive personal information to LPS is, or may be, necessary or appropriate for particular purposes, please contact LPS at [privacy@lenovo.com](mailto:privacy@lenovo.com).***

## What information does LPS collect; how is that information used; and is any personal information shared with third parties?

LPS collects information about you when you interact with our website and certain offline services maintained by LPS or our service providers and partners. We use this information to provide you with a product or a service that you have requested; to provide you with customer service or support; to send you

news and updates; when you participate in events; to consider your job application when you respond to a job advertised by us; to improve our website, products and services; and to make sure that they are performing at their best; among other reasons.

LPS does not use or disclose sensitive personal information of consumers. LPS does not use sensitive personal information to infer characteristics about consumers.

Please note that, in certain circumstances, if you do not provide us with personal information where needed, we may not be able to provide you with the products, experiences or functionalities that you have requested. The following describes how we collect, use and share information, including personal information, in certain online and offline contexts.

## Browsing our website

Our web server logs collect the domain names and certain related information of visitors to our website automatically (such as IP addresses or device identifiers). This information is used to measure the number of visits, average time spent on a LPS website, pages viewed and website usage information. We use this information to meet legal or regulatory requirements; to maintain the security and integrity of our website; to measure the use of our sites; to improve the content of our sites; to enable personalized features and content; to display and inform advertisements and marketing; and to enable third-party advertising companies to assist us in serving ads specific to your interests across the Internet. We may collect this information using cookies and other technologies, as explained below under the section *“Does LPS use cookies, tags, pixels, web beacons, analytics and related technologies for online advertising and other purposes?”*. This information may be shared with service providers of LPS, including third party data hosting, data processing and website services so that they may support the functionality, security, integrity, and improvement of our website and marketing efforts.

LPS may also conduct research on our users' demographics (for example, age and gender), interests, and behavior based on the information you provide to us when making a purchase, during a promotion, from surveys and from our server log files. We do this to better understand and serve you. LPS sometimes supplements this information with additional data supplied by third parties. LPS may share this data with our service providers so that they may provide data hosting, processing, analysis, and related services to LPS.

## Your user profile

Your user profile, if created, may consist of information, including personal information, you provide while interacting with LPS, such as your use of certain areas of our website; your contact with our personnel; and from certain LPS products and services that you use. Your user profile allows LPS to:

- Give certain LPS products and services the information they need to function;
- Troubleshoot problems you may have with a LPS product, service or website;
- Suggest ways to make your LPS products, services and our website work better;

- Provide you with news, updates, and information about your LPS products, services, and job opportunities; and
- If you choose to receive marketing communications, provide you with information about additional LPS products or services that you may be interested in.

## Artificial Intelligence

Certain LPS products, applications, and services may use technologies and tools that are powered by machine learning and artificial intelligence. The purpose of these technologies and tools is to deliver and improve our products and services in an ethical way. If a particular LPS product, application, or service uses artificial intelligence to process personal information of our customers, consumers, employees, or users, we will describe those practices to the extent applicable and as required by law. Additionally, LPS may use data collected from products, applications, and services to train machine learning and artificial intelligence models.

**The following sections describe in further detail the types of information that may be contained within a user profile, how LPS uses that information, whether that information is shared with any third parties, and certain choices you may have regarding the information.**

## Customer service and quality monitoring

Certain LPS product and service support activities may also involve you contacting LPS or LPS contacting you, including by phone, email, or chat. Please note that, in these cases, we may record calls and chat session transcripts for staff training and quality assurance purposes. To provide you with the service or support that you have requested, LPS personnel may also collect and access personal information about you, such as your user profile, account information, contact information, LPS product and service identifiers, and information about how you use your LPS product and service.

## Marketing, sales, promotions, surveys, and events

If you receive marketing, advertising, sales, or promotional communications from LPS and/or their partners – such as via email – or if you choose to participate in an event, contest, or survey, we will collect personal and non-personal information about you to help us manage these campaigns and communications, or to facilitate your participation. In particular, we may collect your name, address, email address, phone number, age/date of birth, LPS product information, your user profile data, and additional personal information you choose to provide. We may also use this information to send to you product support notices; announcements; newsletters; and, when allowed by applicable laws and regulations, invitations to complete customer satisfaction surveys.

LPS and selected service providers or partners – including marketing, advertising, surveys, and events companies – may also use the information you provide to conduct promotional, customer satisfaction or product support activities on our behalf or as part of a joint event or promotion between LPS and that company. LPS may also use data hosting and processing service providers to support these activities, as well as external tools to help us learn more about consumer trends, marketing email open/click rates, and

so forth. In addition, we may acquire data from third party sources, such as consumer research firms, to supplement the information that we collect from you. For further information on how our website may use third party cookies and related technologies to support its marketing and advertising activities online, please see the section below entitled *“Does LPS use cookies, tags, pixels, web beacons, analytics and related technologies for online advertising and other purposes?”*.

You are not required to subscribe to receive LPS marketing or sales communications to purchase a product or service from LPS. If you have chosen to subscribe, you may choose to unsubscribe subsequently: by following the instructions included in those communications; by navigating to the [Lenovo unsubscribe or opt-out mechanism](#); by changing your preferences in your account settings; or you can [submit a privacy request](#).

## Social media

Some of our website include social media features and links, such as a social bar with icons that link to the LPS presence on particular sites (for example, the LPS page on Facebook, the LPS feed on Twitter or LinkedIn). These features may collect your IP address and information on which page you are visiting on our site and may set a cookie to enable the feature to function properly. Social media features and widgets either are hosted by another company or are hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

## Testimonials

LPS sometimes displays product and services reviews, testimonials, and other endorsements of satisfied customers on our sites. Our service providers often manage these reviews and related website features. With your consent, we may post your comments along with your name.

## Employment applications

You may choose to provide LPS with personal information when you express an interest in employment opportunities at LPS, such as by submitting an application or resume through our website. The information we collect from you will be made apparent at the time you are submitting your application and will include such things as name, contact information, background, education, employment history and other information normally used to evaluate candidates for employment opportunities. We will use this information only to evaluate your employment candidacy and will share it only with those service providers who support these activities, such as candidate search firms working on behalf of LPS, and background screening companies to help vet a candidate’s application. LPS may use service providers to help process and manage the information it collects in this context, including LPS business and corporate services. We may also supplement an employment application received with additional information found via publicly available resources, such as LinkedIn profiles.

## Mergers and acquisitions

Circumstances may arise when LPS decides to sell, buy, merge, or otherwise reorganize businesses in some countries. You will be notified via a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers or receiving it from sellers.

## Legal requirements and to enforce our rights

It is possible that personal information will be subject to judicial or other government subpoenas, warrants, orders, or criminal and anti-fraud investigations. Therefore, when we believe in good faith that the law requires it, we may disclose personal or other information to regulatory or government bodies, courts of law, tribunals, and law enforcement agencies. We may also need to disclose personal or other information to protect our rights, protect your safety or the safety of others, or to investigate theft or fraud. In addition to the above, there may be circumstances that require us to disclose your personal information to other parties, including, but not limited to, legal advisers or debt collection agencies.

## Does LPS use cookies, tags, pixels, web beacons, analytics and related technologies for online advertising and other purposes?

As is true of most websites, we use and allow specific partners to use cookies, clickstream capture, pixels, web beacons, web collection forms and other similar technologies (collectively, “**Automated Collection Tools**”) on LPS website to collect certain information automatically. We use these tools and the information they collect to, among other purposes, help us provide better customer service, improve the quality of our website experiences, and deploy and understand the effectiveness of our advertising and marketing efforts.

For example, we keep track of the domains from which visitors come to our website, and we also measure visitor activity on LPS website. LPS or others on behalf of LPS may use this data to analyze trends and statistics, to improve our website and to serve advertising.

## Cookies, pixels, and online advertising

To offer and provide a customized website experience, LPS may use Automated Collection Tools such as cookies, pixels, tags, and scripts to store and help track information about you. Where required by applicable laws and regulations, LPS will acquire consent from you prior to using non-essential cookies during your LPS website experience and/or will offer you the opportunity to choose which types of cookies to enable or disable. Cookies are small pieces of data that are sent to your browser from a web server and stored on your computer's hard drive. LPS uses cookies to help remind us of who you are and to help you navigate our sites during your visits. Cookies enable us to save preferences and shopping cart contents for you so you will not have to re-enter them each time you visit.

On our web sites, a notification banner will appear allowing you to manage your consent to collect cookies (cookie banner). Below is a summary of the categories of cookies collected on our websites, and how your consent may impact your experience of certain features as you navigate those websites:

- **Strictly necessary cookies:** These cookies are necessary for core features of this site to operate properly. Because they are needed for the site's operation, they are always set to "Active". You may disable these by changing your browser settings, but this may affect how the website functions.
- **Performance cookies:** These cookies collect data on user behavior. On this basis, the website is adjusted to the general user behavior in terms of content and functionality. The information collected is generally processed in aggregated form unless a visitor has expressly consented to a personal evaluation. Performance cookies are only used to improve the performance of the website and to tailor the online experience to the needs of the users.
- **Functionality cookies:** Functionality cookies enable the website to store information such as the username or language selection and to offer the user improved and personalized functions based on this information. The information collected is only evaluated in aggregated form. Since we would like to offer you a website that is designed for optimum user-friendliness, we recommend that you activate these cookies. Functional cookies are also used, for example, to activate the functions you desire, such as the playback of videos.
- **Targeting cookies or marketing cookies:** These cookies are used to offer content that is more relevant to the user and adapted to his interests. They are also used to measure and control the effectiveness of campaigns. For example, they register whether a website has been visited or not, as well as which content has been used. This information is used to create an interest profile so that only content that is interesting for you is displayed. If you withdraw your consent to marketing cookies, this does not mean that you will see or receive less content as a result. Rather, it means that the content you see and receive is not tailored to your individual needs.

You can manage your consent for targeting cookies using the cookie banner, or by updating your browser's settings (often found in your browser's Tools or Preferences menu) to not accept cookies.

Although most browsers automatically accept cookies, you can choose whether to accept cookies via the cookie consent banner or your browser's settings (often found in your browser's Tools or Preferences menu). If you wish to revoke your selection, you may do so by clearing your browser's cookies, or by updating your preferences in the cookie banner.

## Local Storage Objects

Additionally, some LPS website experiences may use local storage objects (LSOs) such as HTML5 provided by service providers and partners of LPS to store content information and preferences on your device. Various browsers may offer their own management tools for removing HTML5 LSOs.

## Web beacons and other technologies

The LPS website also use web beacons or other technologies such as JavaScript to better tailor those sites to provide better customer service. These technologies may be in use on several pages across the LPS website. When a visitor accesses these pages, a non-identifiable notice of that visit is generated. This may

be processed by us or by our service providers. These web beacons usually work in conjunction with cookies. If you turn off cookies, web beacons and other technologies will still detect visits to these pages, but the notices they generate cannot be associated with other non-identifiable cookie information and are disregarded.

## Personalized URL links

On occasion, we may personalize and customize websites for certain visitors. If you visit one of these sites, you may find it customized with references to products and/or services that we believe may be of interest to you, based on your previous interactions with LPS and information you have provided to us. While you are visiting these websites, we may collect information about your visit to better tailor the site to your interests. An invitation to visit one of these websites can be presented as a personalized URL in an email, a notice on a website registration page, or as a response to you logging on to a certain website.

## Does LPS sell my personal information?

LPS does not sell (as “sell” is traditionally defined) personal information of customers of any age. Some privacy laws, however, classify certain sharing of personal information for advertising purposes as a “sale” even though recipients of the data are subject to contract terms with LPS that severely limit their rights to use and retain the information that LPS shares with them.

LPS may share these categories of personal information with LPS's third-party service providers and partners, to provide analytics and reporting related to the effectiveness of advertising, to support our products and website, and/or to provide additional services to LPS and its customers and product users. In doing so, LPS takes appropriate steps to ensure that these service providers and partners are meeting our standards of robust privacy and strong security.

## Does LPS transfer my personal information internationally?

LPS is an international organization with legal entities, business processes, management structures, and technical systems that cross borders. Therefore, where permitted by law, we may share your personal information between LPS group companies (including to subsidiaries, affiliates, and parent companies) or our service providers and business partners as necessary for us to meet our legitimate business needs and may transfer it to countries in the world where we do business. Regardless of where your personal information is transferred to and resides, our data privacy and information security practices are designed to provide protection for your personal information.

Some countries have privacy laws that are not equivalent to privacy laws in your own country and your data could be requested by law enforcement agencies in those jurisdictions. In such countries, LPS will still handle personal information in the manner we describe here and will take such measures as are necessary to comply with applicable data privacy laws when transferring and processing your personal information.



Where required, LPS will also maintain agreements between LPS group companies or with LPS partners or service providers to govern the transfer, processing, and protection of personal information.

## How long will my personal information be retained?

LPS intends to retain information, including personal information, only as long as necessary for business or other compelling purposes; and to securely delete personal information when those purposes of use have been satisfied. We will retain your personal information for as long as any of the following circumstances apply:

- Your account or subscription is active;
- To provide you with services or support that you may have requested;
- To ensure required functionality and performance of LPS products services, and website;
- To comply with applicable laws and regulations; and
- To enforce our rights.

## How is my information protected?

We use standard technical and organizational measures when we transmit information from our website to our servers, when we store data, and when we share it with third parties. When sharing your information with third parties, we will take reasonable and appropriate steps to contractually require that such parties will protect and use your information responsibly.

**However, please remember that no website, service, or data transmission can be guaranteed to be one-hundred percent secure.** As a result, while we have taken appropriate steps to protect your information, LPS cannot ensure or otherwise warrant the security of our website or any information you provide to us. By using our website, you do so at your own risk.

## What about my child's privacy?

Our website is not designed for or intended to direct at individuals under the age of 18 ("minors"). LPS does not knowingly collect data from minors under the age of 18, or equivalent minimum age in the relevant jurisdiction, as defined by applicable law without the prior consent of their parents or legal guardians or as otherwise permitted by law. If LPS learns that a minor submitted personal information to LPS, we will delete the personal information as soon as possible and not use it. LPS encourages parents to take an active role in minors' use of interactive resources and to inform them of the potential dangers of providing personal information.

# What are my data protection rights?

Applicable data privacy laws may give you the right to control our use and processing of your personal information. These may include the right to:

- Request confirmation, access to and a copy of your personal information;
- Request rectification or erasure of your personal information;
- Object to processing of your personal information;
- Restrict processing or to opt-out from direct marketing or any sale of your personal information; and
- Withdraw your consent where the processing of your personal information is consent-based;
- Data portability.

Where we use your personal information with your consent, you can withdraw your consent at any time, though this will not affect our use of your personal information prior to the withdrawal of your consent. You may review, correct, or delete certain personal information via your LPS account if you have one.

To exercise your rights as described above, [submit a privacy request](#). We will review, respond to and act upon any such requests in accordance with the applicable data privacy laws. We will seek to resolve your concern within one month of receipt. Where the concern is complex or we have a large volume of concerns, we will notify you that the concern will take longer than one month to resolve, and we will seek to resolve your concern within three months of the concern being first raised.

Please note that we will take steps in accordance with applicable laws and our data privacy and information security standards to verify your identity before granting you access to your personal information or otherwise complying with your request. If you have a LPS account, we may verify your identity by requiring you to sign into your account. If you do not have a LPS account, or an email address on file with us, then we may request additional limited information from you in order to verify your identity. Please note that if you do not have an account with LPS, or an email address on file, or if we are unable to verify your identity in our records, we may deny your request.

You may also use an authorized agent to submit a request under this section on your behalf. If you choose to have an authorized agent submit such a request on your behalf, LPS will require: (i) you to provide the authorized agent written permission to do so; and (ii) your agent to verify their identity directly with LPS. LPS may deny a request from an agent that does not meet these requirements.

In addition, you have the right to raise questions or complaints with your applicable national data privacy authority at any time. You also have the right to not be discriminated against for exercising your privacy rights.

## How may I contact the LPS Privacy Program?

To exercise your rights as described above [submit a privacy request](#).

If you have additional questions about this privacy Statement you can contact the Lenovo and LPS personnel responsible for privacy program at [privacy@lenovo.com](mailto:privacy@lenovo.com), or the following addresses:

**Hong Kong**

Level 1, The Long Beach Commercial Podium, 8 Hoi Fai Road, Kowloon

**Beijing**

Room 1201, Building A, Shangdu International Center, No. 8 Dongdaqiao Road, Chaoyang District, Beijing  
Postal Code: 100020

**Kallang Place**

30A Kallang Place, #10-01/12, Singapore 339213

**Kuala Lumpur**

Suite 30-1, Level 30, Vertical Corporate Tower B, Avenue 10, The Vertical, Bangsar South City, No. 8, Jalan Kerinchi, 59200 Kuala Lumpur, Malaysia

**Manila**

10th Floor, The 30th Corporate Center, 30 Meralco Avenue, Brgy. Ugong, Pasig City, Philippines 1605

**Macau**

Unit B-C, 16 Floor, Macao Chamber of Commerce Building, 175, Rua De Xangai, Macau

Additional LPS contact information may be found at <https://www.lpstech.com/site/en/contact-us>.