

Spacent Privacy Policy Spacent隐私政策

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1. General

概览

Welcome to Spacent! This Privacy Policy (the “**Policy**”) describes how Spacent Ltd (“**Spacent**”, “**we**” or “**us**”) processes personal data in conjunction with your access to and use of the Spacent website, including any subdomains thereof, and any other websites through which Spacent makes its services available (collectively, “**Site**”), the Spacent mobile, tablet or other smart device applications, and application program interfaces (collectively, the “**Application**”), and all associated services (collectively, “**Service**”), whether you are browsing users or registered users (collectively, the “**Users**”). The Site, Application and Service together are collectively referred to as “**Platform**”.

欢迎访问 Spacent! 无论您是浏览用户还是注册用户（以下合称“**用户**”），本隐私政策（以下称“**政策**”）描述了在您访问和使用 Spacent 网页，包括其子域、Spacent 提供服务的其他网站（统称为“**站点**”）、Spacent 移动设备、平板电脑或其他智能设备的应用程序、应用程序接口（统称为“**应用程序**”）以及所有相关服务（统称为“**服务**”），站点、应用程序和服务统称为“**平台**”时，Spacent Ltd (以下称“**Spacent**”，“**我们的**”或“**我们**”)如何处理您的个人数据。

This Policy doesn't apply to:

本政策不适用于:

The data practices of other companies and organizations that advertise our Service;

为我们的服务提供广告服务的其他公司或组织的信息处理;

Services offered by other companies or individuals, including products or sites that may include Spacent Service, be displayed to you in search results, or be linked from our Service.

在搜索结果中显示的，或通过我们的服务链接跳转至第三方公司或组织提供的服务。这些第三方的产品或服务中可能含有 Spacent 提供的服务。

Before providing us with your personal data, please read this Policy carefully to learn about our privacy practices. IF YOU DO NOT AGREE TO ANY TERM OR CONDITION OF THE POLICY, YOU MAY NOT USE THE PLATFORM OR SERVICE. BY ACCESSING OR USING PLATFORM, YOU AGREE TO COMPLY WITH AND BE BOUND BY THE POLICY HEREIN.

在向我们提供您的个人数据之前，请仔细阅读本政策，以了解本公司的隐私处理实践操作。如果您不同意本政策中的任一条款或条件，请停止使用我们的平台或服务。您访问或使用平

台表示您同意遵守本政策并受其约束。

2. Data Controller and Contact Information

数据控制人和联系方式

If your country of residence is People's Republic of China, and you request or provide a reservation of a specific location, room, site, or other area within a work environment (the "Space") located in PRC via our Service, the Data Controller is the Spacent entity set out below for that transaction.

如果您的居住地为中华人民共和国，并且您通过我们的服务寻求或提供位于中国特定位置、空间、地点或其他区域的工作环境（“空间”）的预定，则数据控制人为该等交易的以下 Spacent 实体。

Name: Spacent Ltd.

姓名: Spacent Ltd.

Address: Yliopistonkatu 4, 00100 Helsinki, Finland

地址: 芬兰赫尔辛基00100大学街4号

Contact information: hello@spacent.com

联系方式: hello@spacent.com

3. What Data Do We Process?

我们处理哪些数据?

We process the following personal data of Users using the Service:

对于使用本服务的用户，我们会处理以下个人数据：

- 1) **User Data**, such as name of the User or your company and company's contact person, address, telephone number, email address and data relating to the payment instrument and invoicing.
用户数据，如用户姓名、您的工作单位和联系人姓名、地址、电话号码、电子邮件地址以及与支付和开具发票相关的数据。
- 2) **Log Data**, such as the IP address of your device, name and identification number of your device, operating system version, the configuration of the App when utilizing our Service, the time and date of your use of the Service, cookies and other statistics.
日志数据，如您使用设备的IP地址、设备名称和设备识别号、操作系统版本、使用本服务时应用程序的配置、您使用本服务的时间和日期、Cookie和其他统计数据。
- 3) **Property Data**, such as bank account, authentication data (password), credit records, credit data, and transaction and consumption records.
财产数据，如银行账户、认证数据（密码）、信用记录、信用数据、交易和消费记录。
- 4) **Location Data**, such as data we collect when you turn on your device's location feature and use our location-based Service. This includes your geographical position data collected via GPS or WIFI, your address data contained in the account data you provide to us, and shared data uploaded by you or others showing your current or previous location.
地理位置数据，例如我们在您打开设备的定位功能并使用我们提供的需定位的服务时收集的数据。这包括通过GPS或WIFI收集的您的地理位置数据、您提供给我们的账户数据

中包含的地址数据，以及您或其他人上传的显示您当前或以前的位置的共享数据。

- 5) **Data of the customer relationship and account**, such as data of past and current contracts and orders, correspondence with the User and other data which the User voluntarily provides when creating an account or modifying it or when providing feedback on our Service.

客户关系和账号的数据，例如之前和当前的合同和订单的数据、与用户的通信以及用户在创建账号、修改账号或对我们的服务提供反馈时自愿提供的其他数据。

- 6) **Data regarding your direct marketing opt-in or opt-out.**

有关您选择加入或退出直接营销的数据。

- 7) **Data gathered with the data subject's consent.**

在数据主体同意的情况下收集的数据。

- 8) **Other important data.**

其他重要数据。

Some of the personal data we collect are necessary for the proper performance of our Service. In order to register as a User, you need to provide us with the user data mentioned above. Processing of certain types of your personal data requires your consent, such as processing for electronic direct marketing purposes and processing of your location data. Your consent for processing of your location data is also necessary for the proper performance of the Service.

我们收集的部分个人数据是我们提供妥善服务所必需的。为了成为注册用户，您需要向我们提供上述的用户数据。处理您某些类型的个人数据需要您的同意，例如出于电商营销目的的数据处理或对您地理位置数据的处理。您同意我们处理您的地理位置数据也是我们提供妥善服务的必要条件。

4. How Do We Collect Your Data?

我们如何收集您的数据？

The legal basis for the processing of your personal data are the agreement between you and us for providing the Service, our legitimate interests (e.g., customer relationship management and the delivery of our Service) and your consent. There are four general categories of data we collect:

处理您的个人数据的法律依据是您和我们之间就提供服务达成的协议、我们的合法权益（例如客户关系管理和提供的服务）以及您的同意。我们收集的数据有四大类：

- 1) Data provided by you when you register as a User of our Service or when you voluntarily provide feedback on our Platform or via other means of communication;
当您为使用服务而成为我们的注册用户时或当您自愿通过我们平台或以其他方式提供反馈时，您所提供的数据；
- 2) Data that is gathered automatically when you use our Service;
当您使用我们的服务时自动收集的数据；
- 3) Data that is gathered during the period when the storage of cookies on your device is enabled;
启用设备上的cookie存储功能期间收集的数据。
- 4) Data that is gathered from third-party service providers.

从第三方服务提供商处收集的数据。

You understand and agree that we do not have to obtain consent from you for collecting and using your data in following cases:

您理解并同意，我们在下列情况下收集和使用您的数据无须征得您的同意：

- a) In connection with the fulfillment of obligations under laws or regulations;
与履行法律或法规规定的义务有关的；
- b) Directly related to national security or national defense;
与国家安全和国防安全直接相关的；
- c) Directly related to public security, public health or major public interests;
与公共安全、公众健康或重大公共利益直接相关的；
- d) Directly related to criminal investigations, prosecutions, trials or execution of court decisions;
与刑事侦查、起诉、审判或法院判决执行直接相关的；
- e) For the purpose of safeguarding the life, property or other significant legitimate rights and interests of Users or other individuals, and it is hard to obtain consent from the personal data subjects;
为保护用户或其他个人的生命财产及其他重大合法权益，但又难以征得个人数据主体同意的；
- f) The personal data is disclosed to the public by data subjects, and
数据主体自行向社会公开个人数据的；及
- g) The collecting and using of personal data are essential to maintaining safe and stable operation of the product or Service provided, such as the discovery and handling of product or Service failures.
个人数据的收集和使用对于维护我们提供的产品或服务的安全和稳定运行至关重要，例如发现、处理产品或服务故障。

5. How We Use the Data We Collect

我们如何使用所收集的数据

We may use data collected through Spacent Platform to:

通过Spacent平台收集的数据可能用于：

1) Provide you with the requested Service

提供您所需求的服务

We use the data we have to provide Service to you, such as creating a User Account, processing your Space posting or reservation request, and communicating with you about Service requested. 当我们向您提供服务时会使用收集到的数据，例如创建用户账户、处理您的空间发布或预订请求以及与您沟通所需服务时。

2) Maintain and improve our Service

保持和改进我们的服务

We use the data we have to operate, protect, improve, and optimize the Spacent Platform and experience, such as by performing analysis and conducting research.

我们使用我们拥有的数据来操作、保护、改进和优化Spacent平台和用户体验，例如对数据进行分析研究。

3) Protect the security of you and our Platform

保护您和我们的平台的安全

We use the data we have to verify accounts and activities, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of our Service, and promote safety and security on and off of Spacent Platform. For example, we use data we have to investigate suspicious activity or violations of our terms or policies, or to detect when someone needs help.

我们使用我们拥有的数据来验证账户和管理活动，打击有害行为，检测和防止垃圾邮件和其他不良体验，以维护我们服务的完整性，以及促进Spacent平台的安全。例如，我们使用数据来调查可疑活动或调查违反我们的条款或政策的行为，或者检测用户何时需要帮助。

4) Exercise a right or obligation conferred or imposed by law, including responding to request and legal demands

行使法律赋予的权利或要求的义务，包括回应要求和法律要求

5) Provide personalized Service, including content and ads

提供个性化服务，包括定制内容和广告

We use the data we collect to customize our Service for you, including providing recommendations, personalized content, and customized search results. For example, Spacent may use data like your log data to suggest Space you might like.

我们使用我们收集的数据来为您定制我们的服务，包括提供建议、个性化内容和自定义搜索结果。例如，Spacent可能使用您的日志数据向您推荐您可能喜欢的空间。

Depending on your settings, we may also show you personalized ads based on your interests. You can control what data we use to show you ads by visiting your ad settings.

根据您的设置，我们也可能根据您的兴趣向您显示个性化广告。您可以通过访问您的广告设置来控制我们用以显示广告的数据。

We don't show you personalized ads based on sensitive categories, such as race, religion, sexual orientation, or health.

我们不会向您显示基于敏感信息的个性化广告，如涉及种族、宗教、性取向或健康状况。

We don't share data that personally identifies you with advertisers, such as your name or email, unless you ask us to.

除非您要求我们，否则我们不会与广告商共享您的个人身份数据，例如您的姓名或电子邮件。

6. How Do We Share and Disclose Your Personal Data

我们如何共享和披露您的个人信息

1) **Sharing between Users**

用户之间的共享

To help facilitate bookings or other interactions between Users, we may need to share certain data, including personal data, with other Users, as it is necessary for the adequate performance of the Service between you and us, such as:

为了协助预订或方便用户之间的互动，我们可能需要与其他用户共享某些数据，包括其个人数据，因为这是充分履行您和我们之间的服务所必需的，例如：

When you as a Guest submit a reservation request, certain data about you is shared with the Space Operator, including your profile, full name, your cancellation history, and other data you agree to share.

当您作为客人提交预订请求时，您的某些信息将与空间运营商共享，包括您的个人资料、姓名、取消预订历史记录以及其他您同意共享的数据。

When you as a Space Operator publish Space through the Platform, certain data is shared with the Guest (and the additional Guests they may invite, if applicable) to coordinate the reservation, such as your profile, full name and phone number of your contact person.

当您作为空间运营商在平台发布空间时，我们会与客户（以及他们可能额外邀请的客户，如有）共享某些信息，例如您的个人资料、姓名和联系人的电话号码。

2) **Sharing with Affiliates, Co-operation Partners and Subcontractors**

与关联公司、合作伙伴和分包商共享

We may disclose your data to our affiliate, co-operation partners and subcontractors who facilitate our Service, assist us in analyzing the usage of our Service and provide Service that is related to the performance of our Service. We will only share your personal data to the extent necessary for providing the Service.

我们可能会向我们的关联公司、合作伙伴和分包商披露您的数据，以便利我们的服务，协助我们分析服务的使用情况，并提供与我们履行义务相关的服务。我们只会在提供服务所必需的范围内共享您的个人信息。

3) **Compliance with Law, Responding to Legal Requests, Preventing Harm and Protection of our Rights.**

遵守法律，回应法律要求，防止侵害和保护我们的权利。

Spacent may disclose your personal data, to courts, law enforcement agencies, governmental authorities, tax authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with our legal obligations, or (ii) to comply with a valid legal request or to respond to claims asserted against Spacent, or (iii) to respond to a valid legal request relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our Users to legal liability, or (iv) to enforce and administer our Terms of Service or other

agreements with Users, or (v) to protect the rights, property or personal safety of Spacent, its employees, its Members, or members of the public.

在法律要求或允许或者披露行为合理且必要的情况下，我们可向法院、执法机构、政府机关、税务机关或经授权的第三方披露您的个人信息：(i) 遵守法律义务，或(ii) 遵守正当的法律要求或回应针对 Spacent 的起诉，或(iii) 回应与刑事调查或涉嫌违法行为相关的正当法律要求，或回应或处理可能使我们、您或其他用户承担法律责任的任何其他活动，或(iv) 执行和管理我们的服务条款或与用户达成的其他协议，或(v) 保护 Spacent、其员工、会员或社会成员的权利、财产或人身安全。

Where appropriate, we may notify Users about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon Spacent's property, its Users and the Spacent Platform.

在适当的情况下，我们会将法律要求告知用户，除非：(i) 法律程序本身、我们收到的法院命令或适用的法律禁止我们提供通知，或(ii) 我们认为发出通知是徒劳的、无效的，或会对个人或团体造成损害或人身伤害的风险，或对 Spacent 的财产、其用户和 Spacent 平台造成或增加欺诈和风险。

4) Business Transfers

业务转让

If Spacent undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your data in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal data is transferred and becomes subject to a different privacy policy.

如果 Spacent 进行或涉及任何兼并、收购、重组、资产转让、破产或资不抵债，则我们可能出售、转让或共享我们的部分或全部资产，包括您与该等交易有关或预期中的数据（例如尽职调查）。在此情况下，我们将在您的个人数据被转移并遵守不同的隐私政策之前通知您。

5) Aggregated Data

汇总数据

We may also share aggregated data (data about our Users that we combine together so that it no longer identifies or references an individual User) and other anonymized data for regulatory compliance, industry and market analysis, research, demographic profiling, marketing and advertising, and other business purposes.

我们还可能共享汇总数据（我们将用户数据合并使其不再会被识别为或涉及某一特定用户后得出的数据）和其他匿名数据，以实现监管合规、行业和市场分析、研究、人口统计、营销和广告以及其他商业目的。

7. Cookies and Third-party Links

Cookie和第三方链接

Cookies are small text files that are transferred to your device while using the mobile application. Our Service uses cookies and other similar technologies for the purpose of managing and developing the application as well as improving and analyzing user experience. If you use our Service and enable the cookies in your device settings, we deem that you have consented to the use of cookies in connection to the Service.

Cookie 是在使用移动应用程序时传输到您设备上的小型文本文件。我们的服务使用 Cookie 和其他类似的技术来管理和开发应用程序，以及改进和分析用户体验。如果您使用我们的服务并在您的设备设置中启用 Cookie，我们认为您已经同意在服务中使用 Cookie。

We may use the following cookies:

我们可能使用以下 Cookie:

- 1) **Necessary cookies and Service provision:** Cookies are essentially necessary for the proper functioning of our Service and they enable a good user experience. These cookies do not collect data that would enable us to identify the User.

必要的Cookie和服务提供: Cookie对于我们的服务的正常运作是必不可少的，并且能够提供良好的用户体验。这些Cookie不会收集能够识别用户个人身份的数据。

- 2) **Functionality cookies:** These cookies enable personalized content and recognize and remember your preferences when you return to the Application.

功能Cookie: 这些Cookie支持个性化的内容，并在您返回应用程序时识别和记住您的首选项。

- 3) **Statistics cookies:** These cookies can be used to improve the functioning of the Service. We receive data about how the Application is used, e.g., which parts of our Application are the most popular and how long Users stay on the Site while using the Application.

统计Cookie: 这些Cookie可以用来改进服务质量。我们接收有关应用程序使用情况的数据，例如，我们的应用程序的哪些部分最受欢迎，以及用户在使用应用程序时在网站上停留的时间。

- 4) **Social media and marketing cookies:** By using these cookies we can make the content of the Service as individually customized as possible, and thereby show e.g., targeted advertisement and content based on the User's prior behavior.

社交媒体和营销Cookie: 通过使用这些Cookie，我们可以使服务的内容尽可能地个性化，例如显示基于用户先前行为而推荐的广告和内容。

You can review the available cookie settings on your device. You can change settings for the use of cookies to decline the storing of cookies on your device. Please note that by blocking or deleting cookies you may not be able to take full advantage of the Service.

您可以查看设备上的可用Cookie设置。您可以更改Cookie的使用设置，以拒绝在您的设备上存储Cookie。请注意，如果您选择拒绝或删除Cookie，可能会影响我们服务的功能性、可用性。

Our Platform may include links and connections to third party websites. These third-party services

and applications offered in connection to the Service are subject to the privacy policies or notices of such third parties. We recommend you familiarize yourself with such third-party privacy policies or notices.

我们的平台可能包括第三方网站的链接。这些第三方服务和应用程序受第三方的隐私政策或通知的约束。我们在此建议您仔细了解此类第三方隐私政策或通知。

8. How Do We Protect and Store Your Data?

我们如何保护和存储您的数据？

We use appropriate technical and organizational measures to protect your personal data. The data we collect and obtain is stored into secure physical environments with limited access and databases protected by firewalls and passwords. The personnel and processors of personal data are obliged to keep the data strictly confidential, and each User has a user ID and password to the systems where personal data is stored.

我们使用适当的技术和组织措施来保护您的个人数据。我们收集和获取的数据被存储在安全且有访问限制的环境中，并且数据库受到防火墙和密码的保护。个人数据的主体和处理人员都有义务对数据严格保密，并且每位用户均需使用独立的用户名和密码进入存储个人数据的系统。

The personal data is stored for the period necessary to fulfill the purposes outlined in this Privacy Policy, and in no way shorter than the shortest period described by applicable laws. After that, the data will be deleted within a reasonable time frame or rendered anonymous. We store data in accordance with applicable legislation, and regularly review the need for storage of personal data.

您的个人数据的存储期限为完成本隐私政策之目的所必需的期限，且不得短于所适用的法律规定的最短期限。在此之后，您的个人数据将在合理的期限内被删除或做匿名化处理。我们会依法存储数据，并定期审查个人数据存储的需要。

Please note and understand that the Internet cannot be absolutely secure. Despite the aforesaid protection measures taken, we still can't guarantee or promise with 100% certainty about the security of our Service or of any data provided by you. If your personal data is leaked, your personal or property security may be affected. Therefore, we strongly advise you to assist us in protecting your account security by secure manner or using complicated password. Upon discovering the leakage of your personal data, please contact us immediately so that we can take relevant measures to protect your data security.

请注意和理解，互联网不可能是绝对安全的。尽管采取了上述保护措施，我们仍然不能100%肯定地保证或承诺我们的服务以及您提供的任何数据的安全性。如果您的个人数据被泄露，您的个人或财产安全可能受到影响。因此，我们强烈建议您以安全的方式或使用复杂的密码来协助我们保护您的账户安全。一旦发现您的个人数据被泄露，请立即与我们联系，以便我们采取相应的措施保护您的数据安全。

We may transfer, store or process personal data, listed as below, outside mainland China as a part of our operations, including:

作为我们业务的一部分，我们可能在中国大陆以外的地方传输、存储或处理以下所列的个人数据，包括：

When we transfer, store or process your personal data outside mainland China, we will make sure that the personal data is protected in accordance with applicable laws and regulations by implementing proper safeguards.

当我们在中国大陆以外的地方传输、存储或处理您的个人数据时，我们将确保您的个人数据按照适用的法律和法规得到保护。

9. Children's Privacy

未成年人的隐私

These Services is not directed to anyone under the age of 18. We do not knowingly collect personally identifiable data from children under 18. If you are a parent or guardian and you are aware that your child has provided us with personal data, please contact us so that we will be able to take necessary actions.

我们的服务不面向18岁以下的人士。我们不会有意收集18岁以下未成年人的个人身份数据。如果您是家长或监护人，并且您知道您的孩子已经向我们提供了个人数据，请与我们联系，以便我们能够采取必要的措施。

10. What Are Your Rights as a Data Subject?

您作为数据主体的权利是什么？

This Section describes your main rights to control your personal data in using our Service. Requirements and requests concerning your rights as a data subject should be submitted in writing to the address mentioned above in section “Data Controller and Contact Information”. Your rights are including but not limited to:

本节描述您在使用我们的服务时，您享有的有关个人数据的主要权利。基于您作为数据主体而享有的权利，您的各项请求应以书面形式提交至上述第二节“数据控制人和联系方式”中所述的地址。您的权利包括但不限于：

1) Right to access

访问权

You can inquire or access your relevant personal data in Spacent Service.

您可以在 Spacent 服务中查询或访问您的个人数据。

2) Right to rectify

修改权

You may rectify or alter part of your personal data by following the operation guide and settings on relevant pages in Spacent Service and you can also directly contact us to modify or alter your data.

您可以按照我们在 Spacent 服务的相关页面中给出的操作指南和设置界面中更正或修改您的部分个人数据，也可以直接联系我们来更正或修改您的数据。

3) **Right to delete**

删除权

You can delete your relevant personal data in Spacent Service. You can delete part of your personal data online via the operation guide and settings of relevant product, or via application for deletion to us.

您可以在 Spacent 服务中删除您的相关个人数据。您可以通过相关的操作指南和设置，或通过向我们申请来删除您的部分个人数据。

You can directly demand us to delete your personal data or notify the receiving third-party to delete such if we collect, use or share your personal data in violation with relevant laws and regulations, except where such data has been anonymized or otherwise stipulated by relevant laws or regulations.

如果我们在收集、使用或共享您的个人数据时违反相关法律法规的规定，您可以直接要求我们删除您的个人数据或通知接收第三方删除您的个人数据，但该等数据已经被匿名化处理或相关法律法规另有规定的情况除外。

You understand and agree that once you delete your personal data from Spacent Service by yourself or with our help, we may not immediately delete your data from the backup system subject to applicable laws and regulations and relevant security technology, in which case, we will store your personal data in a secure manner and separate such from any further data processing, till such data is deleted or anonymized during the update of our backup system.

您理解并同意，一旦您自行或在我们的帮助下从 Spacent 服务中删除您的个人数据，我们可能不会立即从备份系统中删除您的数据。在此情况下，我们将以安全的方式存储您的个人数据，并将其与其他信息隔离以避免被进一步处理，直至该等数据在我们的备份系统更新时被删除或被匿名化处理。

4) **Right to withdraw your consent**

撤回同意权

When the processing of personal data is based on your consent, you have the right to withdraw that consent at any time. The withdrawal of your consent does not affect the lawfulness of processing based on consent before the withdrawal. When we process data regarding your location, the processing is always based on your consent. You can also deny any direct marketing and withdraw your consent regarding electronic direct marketing by following the instructions received in connection to the marketing communication.

当我们基于您的同意处理您的个人数据时，您有权随时撤销该同意。您撤销同意并不影响我们在此之前基于您的同意而处理数据的合法性。当我们处理的数据涉及到您的地理位置信息时，处理过程将始终基于您的同意。您也可以按照收到的与营销沟通有关的提示，拒绝任何电商营销，并撤回您对电商营销的同意。

5) **Right to object**

反对权

You also have the right to object to the processing of your personal data or request restricting the processing, as well as the right to lodge a complaint with a supervisory authority.

您有权对您的个人数据的处理提出异议或要求限制处理，并有权向主管当局提出投诉。

11. Changes to this Privacy Policy

隐私政策的变更

We may update this Privacy Policy from time to time. Therefore, you are advised to review this page periodically for any changes. If any changes are made, we will notify you in one or more manners including announcement, push notification, email or any other means before the updated Policy takes effect. If such updates involve collection of more personal data, or changes in the purpose or manner in using/sharing personal data or the receiving third party, we will obtain your authorization and consent. **If you still choose to use Spacent Service, it shall be deemed that you have fully read, acknowledged and agreed to be bound by the updated or changed Policy.**

我们可能会不时更新本隐私政策。因此，我们建议您定期查阅此页面是否有任何更改。如有任何更改，我们将在更新后的政策生效前以一种或多种方式通知您，包括公告、推送通知、电子邮件或任何其他方式。如果该等更新涉及更多的个人数据收集，或更改使用/共享个人数据的目的或方式或接收信息的第三方，我们将获得您的授权和同意。**如果您仍然选择使用 Spacent 服务，则视为您已充分阅读、确认并同意接受更新后政策的约束。**

12. Dispute Resolution

争议解决

This Policy shall be subject to the laws and regulations of the People's Republic of China (exclusive of laws and regulations in Hongkong, Taiwan and Macao).

本政策适用中华人民共和国的法律和法规（不包括香港、台湾和澳门地区的法律和法规）。Any dispute that raised out of or related to this Policy, including but not limited to carrying out the provisions of this Policy, if cannot be settled through negotiation, shall be submitted to **Shanghai International Economic and Trade Arbitration Commission (also known as the Shanghai International Arbitration Center) for arbitration**. The arbitration shall be held in Shanghai, and the arbitral award shall be final and binding on both parties.

因本政策引起的或与本政策有关的任何争议，包括但不限于执行本政策的规定，如不能通过协商解决，应提交至**上海国际经济贸易仲裁委员会（又称上海国际仲裁中心）进行仲裁**。仲裁将在上海进行，仲裁裁决是终局的，对双方均有约束力。

13. Contact Us

联系我们

Should you have any questions or recommendations regarding this Privacy Policy, do not hesitate to contact us at [**hello@spacent.com**](mailto:hello@spacent.com).

如果您对本隐私政策有任何问题或建议，请随时通过hello@spacent.com联系我们。