

## 1. 隱私政策

### Privacy Policy

日煙國際（包含傑太日煙國際股份有限公司；下稱「我們」或「JTI」）致力於保護和尊重您的資料保護和隱私權。

JT International (including JT Tobacco International Taiwan Corp.; collectively, “we”, “us”, “our” or “JTI”) are committed to protecting and respecting your data and privacy.

本隱私政策（「隱私政策」）（連同我們的網站使用條款和任何其他參考文件）係作為我們蒐集及處理您個人資料的依據，請仔細閱讀以下內容。

This Privacy Policy (the “**Privacy Policy**”) (together with our Website Terms of Use and any other documents referred to in it) forms the basis for our collection and processing of your personal data; please read the following carefully.

就中華民國個人資料保護法而言，蒐集、處理及利用您的個人資料之非公務機關可能包括JTI以及本隱私政策第9節所載對象，個人資料之利用地區為JTI與本隱私政策第9節所載對象所在之地區及10節所載之地區。

For the purpose of the Personal Data Protection Act the Republic of China (Taiwan), non-government agencies that collect, process and use your personal data may include JTI and the entities listed in Section 10 of this Privacy Policy, and the regions in which personal data is used are the regions where JTI and the entities listed in Section 10 and the regions listed in Section 10 of this Privacy Policy are located.

## 2. 本隱私政策的範圍

### Scope of this Privacy Policy

本隱私政策說明我們如何遵守個人資料保護相關法令（包括中華民國個人資料保護法及其他可能適用之法令），其中涉及使用我們產品和服務的客戶以及其他個人的個人資料，包括我們所負責的網站、線上平台、系統和應用程式（「平台」）的訪問者，以及經我們授權使用平台之人（例如由我們委請之外部專家）。若您對本隱私政策或我們如何處理您的個人資料有任何問題、評論或請求，歡迎使用「[聯繫我們](#)」表單與我們聯絡。

This Privacy Policy covers how we comply with laws related to personal data protection (including the Personal Data Protection Act of the Republic of China (Taiwan) and other laws that may be applicable), which involves the personal data of customers and other individuals who use our products and services, including visitors to the websites, online platforms, systems and applications for which we are responsible (collectively, the “Platforms”) and those authorized by us to use the Platforms (such as external experts engaged by us). If you have any questions, comments or requests regarding this Privacy Policy or the processing of your personal data, you are welcome to contact us using the [Contact Us](#) form.

## 3. 您有告知我們變更的義務

### Your duty to inform us of changes

我們持有您的個人資料必須保持準確和最新，個人資料的準確性和即時性非常重要。如果您在與我們聯繫期間更改了個人資料，請通知我們。

We must keep your personal data accurate and up to date. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### 4. 我們可能蒐集的資訊

##### Information we may collect

為了提供您所需求的服務和產品及履行或執行我們的法律義務和商業運作（詳見本隱私政策第 8 節），我們可能蒐集的個人資料類別如下：

In order to provide you with the services and products you require and to perform or fulfil our legal obligations and maintain our business operations (see Section 8 of this Privacy Policy for details), we may collect the following categories of personal data:

- 姓名；  
name;
- 年齡；  
age;
- 聯絡方式（例如，地址，電子郵件地址和電話號碼）；  
contact details (e.g., address, e-mail, and telephone number);
- 與我們產品或服務相關的資訊，包括您的帳號，客戶意見回饋，市場調查等；  
information in relation to our products and/or services, including information about your account, customer feedback, market research, etc.;
- 與我們互動的詳細資訊，包括您的需求、您與我們的溝通或對話紀錄、您提供之求職履歷等；  
details of our interactions, including the content of your requests, records of your communications or conversations with us, your job application documents, etc.;
- 當您透過電話客服窗口聯繫我們時，我們可能會錄音並製作錄音檔存放在我們的伺服器或受託機關；  
recordings of your voice and store the recordings that we may make on our services when you contact us via the phone through our customer service;
- 與我們的產品和服務相關的個人偏好和習慣；  
personal preferences and habits in relation to the products and services we provide;
- 從零售店或活動中取得的詳細資料，您到訪的頻率，到訪的區域、持續時間以及購買內容；以及  
your details from retail stores or events, how often you visit, the areas you go to and for how long, and the items you have purchased; and
- 使用我們的平台和聯絡中心技術資訊（包括時間和期間）將您的設備連接到網路的 IP 地址，您的登入資訊，瀏覽器類型和版本，時區設置，流量數據，瀏覽器附加或擴充功能的類型和版本，操作系統和平台，以及有關 Cookies 和追蹤技術使用情況的資訊。必要的 Cookies 將始終保持開啟，您也可以選擇啟用其他 Cookies。有關 Cookies 及如何接受或拒絕 Cookies 的更多資訊，請參見我們的 [Cookies 政策](#) 以及您所造訪網頁的 Cookies 設定欄位說明。  
technical information about the use of our Platforms and contact center, including time and duration, the Internet Protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, traffic data, browser plug-in

or extension types and versions, operating system and platform and information about the use of cookies and tracking technologies. Strictly necessary cookies will always be switched on and you may also choose to enable additional cookies as well. For more information on cookies and how to accept or refuse cookies, please see our [Cookies Policy](#) and the descriptions of the cookie settings on the web pages you visit.

我們可能會蒐集由您直接提供的個人資料，或從其他來源蒐集關於您的資料，詳參以下第 5 節、第 6 節的說明。

We may collect personal data provided directly by you or collect information about you from other sources. For details, please refer to the explanations in Sections 5 and 6 below.

## **5. 我們從您直接獲得個人資料的管道**

### **Where we obtain personal data directly from you**

我們將蒐集由您直接提供的資訊，您也可以透過多種方式向我們提供有關您的資訊，包括但不限於：

We will collect information that you provide directly to us, or you can provide us with information about you in a variety of ways, including but not limited to:

- 使用我們的網站、相關網頁、線上平台等；  
use of our website, related webpages, online platforms, etc.;
- 參加我們所舉辦的線上或線下活動而提供您的相關資訊；  
participate in our online or offline events and provide your relevant information;
- 透過我們的網站、相關網頁、或線上平台填寫表單或聯繫我們（包含但不限於客服聯繫、商業洽詢、徵才應徵等目的）；  
through our website, related webpages, or online platforms, by filling out forms or contacting us (including but not limited to customer service, business inquiries, job applications, etc.);
- 透過我們的客服窗口管道聯繫我們（包含但不限於電話、電子郵件、官方即時通訊帳號等）；或  
contacting us through our customer service channels (including but not limited to telephone, e-mail, official instant messaging accounts, etc.); or
- 由您直接提供資訊的其他管道與方式。  
any other channels and methods where you provide information directly.

## **6. 我們獲取個人資料的其他來源**

### **Where we obtain personal data from other sources**

除了蒐集由您直接提供的個人資料之外，我們還可能透過以下方式蒐集您的個人資料：

In addition to collecting personal data provided directly by you, we also collect your personal data in the following ways:

- 如果您使用我們營運的任何其他平台或我們提供的其他服務，雖然這些平台可能由我們的平台供應商或其相關的第三方運行，我們仍可能蒐集到關於您的資訊；  
we may receive information about you if you use any of the other Platforms that we operate or the other services we provide, which may be run by our Platform providers and their related third parties;

- 我們還與其他第三方（依其適用情況，此第三方包括但不限於其他 JTI 集團公司、主機託管供應商、付款服務供應商、配送供應商、零售商、客戶服務供應商、產品助理、客戶關係管理服務供應商、消費者數據平台供應商、市場推廣自動化供應商、資訊技術服務供應商、年齡驗證供應商、消費者回饋供應商、技術的承包商或分包商、分析供應商、搜尋資訊供應商、信用評等參考機構）緊密合作，我們可能從中蒐集到有關您的資訊；以及

we are also working closely with other third parties (including, for example, other JTI group companies, hosting providers, payment service providers, delivery providers, retailers, customer services providers, product assistants, customer relationship management services, consumer data platform providers, marketing automation providers, technology information services providers, age verification providers, consumer feedback providers, contractors or sub-contractors in technical, analytics providers, search information providers, credit reference agencies, as applicable) and we may receive information about you from them; and

- 我們可能會將從第三方所蒐集到的資訊，與您提供給我們的資訊和我們所蒐集的其他資訊相結合。我們可能依據本隱私政策所載之目的，使用第三方提供的資訊，以及相互結合後的資訊（視我們蒐集到的資料類型而定）。

we may combine information we collect from third parties with information you provide to us and other information we collect. We may use information provided by third parties and the combined information (depending on the type of data we collect) for the purposes set out in this Privacy Policy.

在合乎法令的情況下，如果您已向市場行銷機構提供個人資料，且已同意被第三方聯絡以向您提供相關資訊或產品，我們將於符合相關法令的情況下與您聯繫。

To the extent permitted by law, if you have provided personal data to marketing agencies and have agreed to be contacted by third parties to provide you with relevant information or products, we will contact you if we believe that we have complied with the relevant laws and regulations.

## 7. 我們使用您資訊的目的

### **Purposes for which we use your information**

我們僅會在法律（包括但不限於中華民國個人資料保護法以及其他可能適用之法令）允許的情況下，蒐集、處理、使用您的資訊。我們將基於以下目的，蒐集、處理、使用您的個人資料及/或有關您的資訊，包含：

We will only collect, process and use your information where the law (including but not limited to the Personal Data Protection Act of the Republic of China (Taiwan) and other applicable laws) allows us to. We will collect, process and use your personal data and/or information about you for the following purposes, including:

- 向您提供網站、網頁、線上平台等服務；  
to provide you with services via our websites, webpages and online platforms;
- 依您要求提供我們的產品或服務；  
to provide you with or offer you our products or services at your request;
- 依您要求，向您傳送與我們的產品或服務相關之事實資訊；  
to send you information related to our products or services at your request;

- 促進我們所提供之網站、網頁、線上平台等之使用者體驗；  
to enhance the user experience of the websites, webpages and online platforms we provide;
- 進行客戶關係管理，包含回應和處理您提出的需求、申請、查詢、投訴與意見回饋；  
to manage our customer relationship, including responding to and handling requests, applications, inquiries, complaints, and feedback submitted by you;
- 進行市場調查、研究與資料分析；  
to conduct market research, studies, and data analysis;
- 遵循相關法令要求或依法配合監管機關或司法機關之命令或調查；以及  
to comply with the requirements of applicable laws or cooperate with regulatory authorities or judicial authorities; and
- 與上述有關的其他目的。  
any other purposes related to the above.

尚請留意，如果您拒絕提供個人資料，視您拒絕提供的個人資料項目而定，我們可能無法向您提供我們部分或全部之服務。

Please note that if you refuse to provide personal data, we may not be able to provide you with some or all our services, depending on the personal data you refuse to provide.

## **8. 連接到其他網站**

### **Links to other websites**

我們的網站或平台可能包含其他網站的連結。請注意，一旦您使用這些連結離開我們的網站，尚請理解我們對其他網站的保護、安全和隱私沒有任何控制權。因此，我們無法為您造訪其他網站時的任何資訊保護、安全和隱私負責。本隱私政策不適用於該等第三方網站。在進入該等網站之前，建議您留意並閱讀適用於該等網站的隱私政策。

Our websites or Platforms may contain links to other websites of interest. Please note that once you have used these links to leave our site, you should note that we do not have any control over the protection, security and privacy setting of that other website. Therefore, we cannot be responsible for the protection, security and privacy of any information which you provide whilst visiting such third-party websites and such sites are not governed by this Privacy Policy. Before entering such websites, we recommend that you pay attention to and read the privacy policies applicable to such websites.

## **9. 將您的資訊與第三方共享**

### **Disclosure of your information with third parties**

我們可能會在法律要求或允許的情況下與第三方分享有關您的資訊，包括：

We may share information about you with third parties, where required or permitted by law, including:

- 與我們的第三方服務提供商分享您的資訊，以協助我們為您提供產品和服務，履行我們的商業營運並遵守我們的法律義務（例如，主機託管供應商、付款服務供應商、配送供應商、零售商、客戶服務供應商、產品助理、客戶關係管理服務供應商、消費者數據平台供應商、市場推廣自動化供應商、資訊技術服務供應商、年齡驗證供應商、消費者回饋供應商、技術的承包商或分包商、分析供應商、搜尋資訊供應商、信用評

等參考機構、簡訊服務提供商、雲端服務供應商等)。

with our third party service providers to support us provide you with our products and services, carry out our business operations and comply with our legal obligations (e.g., hosting providers, payment service providers, delivery providers, retailers, customer services providers, product assistants, customer relationship management services, consumer data platform providers, marketing automation providers, technology information services providers, age verification providers, consumer feedback providers, contractors or sub-contractors in technical, analytics providers, search information providers, credit reference agencies, SMS service providers, cloud services, etc.).

- 為了提供您量身定制和有效的客戶服務體驗，我們的某些服務供應商可能在合乎法規且安全的基礎上共同使用我們提供給他們的資訊及其他公司提供的資訊。我們的服務供應商分析這些資訊並提供技術數據，讓您可以獲得更好的客戶體驗，包括在最方便的時間聯絡您。如果您希望收到與此目的相關的進一步資訊，請使用「[聯繫我們](#)」表單與我們聯繫。

to provide you with a more tailored and effective customer service experience, certain of our service providers may, on a secure basis, and to the extent permitted by law, pool the information we provide to them with information provided by other companies to which you have also provided information. Our service providers analyze this information and provide technical data which enables you to receive an enhanced customer experience, including being contacted at times which are most convenient for you. If you wish to receive further information regarding the information collected for this purpose, please contact us using the [Contact Us](#) form.

- 與我們信任的客戶和合作夥伴分享，包括零售商、通路夥伴、專家和顧問。  
with our trusted customers and partners, including retailers, trade partners, experts and consultants.
- 與 JTI 集團公司分享，以讓我們向您提供我們的服務和商品，履行我們的商業營運並遵守我們的法律義務。  
with JTI group companies to provide you with our services and goods, carry out our business operations and comply with our legal obligations.
- 根據法律要求，必須與監管機構和政府部門分享，包括回應有關執法機關或其他政府官員的要求。  
with regulatory authorities and government departments where required by law, including in response to a request from law enforcement authorities or other government officials.
- 我們認為依法必須應揭露必要資訊，以防止實際或財務損失或與涉嫌或實際參與非法活動調查。  
when we consider disclosure to be necessary or appropriate under the law to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity.
- 基於我們營運或業務性質或範圍變更、組織重組或類似企業組織結構變更之原因而必須揭露或分享資訊。  
when disclosure or sharing of information is necessary due to changes in the nature or scope

of our operations or business, organizational restructuring, or similar changes in the organizational structure of the enterprise.

- 在我們出售或購買任何業務或資產時，我們可能向潛在賣家或買家揭露您的資訊。  
if we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets.
- 如果 JTI 集團全部或其絕大多數之資產被第三方收購，關於客戶資訊與相關個人資料將成為轉讓的資產之一。  
if JTI Group or substantially all its assets are acquired by a third party, in which case the customer information and related personal data will be one of the transferred assets.
- 我們需要向會計師、銀行家、保險人員、審計人員和律師等外部專業顧問揭露的個人資料。  
if we need to disclose your personal data to external professional advisers such as accountants, bankers, insurers, auditors and lawyers.

## 10. 儲存您個人資料的地區

### Where we store your personal data

請留意根據個人資料的性質和資料處理的目的，我們蒐集的個人資料可能轉移或傳輸到台灣以外的第三方國家進行儲存。

Please note that depending on the nature of the personal data and the purpose of the data processing, the personal data we collect may be transferred or transmitted to a third country outside Taiwan for storage.

在某些情況下，我們可能依照資料保護法律有關跨境傳輸的規定或豁免條款，將個人資料傳輸到第三國，例如，基於您的同意或為履行我們之間的合約所必需而傳輸。

In some cases, we may transfer or transmit personal data to a third country in accordance with applicable data protection laws on cross-border transfers or exemptions. For example, this may be the case if such transfer is based on your consent or is necessary for the performance of a contract between us.

## 11. 資料安全

### Data security

我們收到您的資料後，將採取適當程序和安全功能以防止未經授權的使用，並防止您的資料意外遺失。使用您的個人資料的單位僅限於因業務需求而必須知悉的員工、代理商、承包商和其他第三方。他們將僅根據我們的指示處理您的資料，並受到保密條款的限制。

Once we have received your information, we will use appropriate procedures and security features to prevent unauthorized access, and to prevent your information from being accidentally lost. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your information on our instructions, and they are subject to a duty of confidentiality.

由於網際網路傳輸資訊並非完全安全，儘管我們竭盡所能保護您的個人資料，但我們無法保證您傳輸至我們平台的資料安全性。針對我們已知悉潛在或已發生的資料外洩情形，我們將依相關資料外洩處理應變程序盡速處理，並視必要情況依法通知您和任何適用的監管機構。



Since the transmission of information via the Internet is not completely secure, although we will do our best to protect your personal data, we cannot guarantee the security of data that you transmit to our Platforms. In the event of a potential or actual data breach of which we become aware, we will respond as quickly as possible in accordance with our data breach response procedure and, where required by law, notify you and any applicable regulator.

如果我們提供您（或者您選擇）能登入我們網站或平台某些網頁的密碼，您有責任保守此密碼的安全。請勿與任何人分享密碼。

If we give you (or you have chosen) a password which enables you to access certain parts of our website or platform, you are responsible for keeping safe this password. Do not share your password with anyone.

## **12. 我們保存資料的期間**

### **How long we will keep your information**

我們僅會在合理且必要的期間內保存您的個人資料，包括為滿足任何法律、監管、稅務、會計、報告要求或公司營運管理需求而收集的資料。如果我們合理認為與您存在投訴事件或訴訟的關係，我們亦可能會長時間保留您的個人資料。

We will only retain your personal data for as long as reasonably necessary, including for the purposes of satisfying any legal, regulatory, tax, accounting, reporting requirements or the company's operational management needs. We may also retain your personal data for a longer period of time if we reasonably believe that there is a complaint or litigation involving you.

為決定個人資料的合適保留期間，我們會考慮個人資料的數量及性質和敏感性，未經授權使用或揭露您的個人資料可能帶來的潛在風險，還有我們處理您的個人資料的目的、我們是否可通過其他方式實現這些目的，以及適用的法律、監管、稅務、會計或其他要求。

To determine the appropriate retention period for personal data, we consider the amount and nature of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## **13. 你的法定權利**

### **Your legal rights**

- 請求查詢或閱覽您的個人資料；  
the right to make an inquiry of or to review your personal data;
- 請求我們提供您的個人資料的副本；  
the right to request a copy of your personal data;
- 請求補充或更正您的個人資料中不完整或不準確的資訊；  
the right to supplement or correct any incomplete or inaccurate information in your personal data;
- 請求刪除您的個人資料；  
the right to delete your personal data;



- 請求停止蒐集，處理或利用您的個人資料，或限制我們利用您個人資料的方式；  
the rights to demand the cessation of the collection, processing or use of your personal data, or restrict the way in which we use your personal data;
- 您有權撤回我們須經您的同意處理的資料之同意；以及  
the right to withdraw your consent to the processing of data that is subject to your consent; and
- 您有權向資訊專員辦公室或其他相關監管機構就處理您的個人資料提出投訴。但希望您先使用本節所提供的聯繫窗口來提交您的需求或投訴。  
the right to lodge a complaint with the Data Protection Office or another relevant supervisory authority about the processing of your personal data. However, we ask you to first use the contact options provided in this section to submit your requests or complaints.

尚請留意，您對於以上權利之行使，尚可能因為所適用之法令，而受有其他額外限制。例如：假如您與我們之間的契約約定個人資料之保存期限，則我們在該期限屆至前可能會拒絕您對於刪除個人資料之請求。

Please note that the exercise of your rights may be subject to additional restrictions under applicable law. For example, if a retention period for personal data has been agreed in the contractual relationship between you and us, we may refuse your request to delete the personal data until the end of that period.

如果您希望行使上述任何權利，請使用「[聯繫我們](#)」表單與我們聯繫。

If you wish to exercise any of the rights specified above, please contact us using the [Contact Us](#) form.

您不需要支付費用以使用您的個人資料或行使您的權利。但是，如果您重複或過度請求，我們可能會收取合理的費用。

You will not have to pay a fee to access your personal data or to exercise any of your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

我們可能需要請您提供特定資訊，以幫助我們確認您的身份並確保您有權使用您的個人資料或行使任何權利。這是一項安全措施，以確保您的資訊不會被透露給任何沒有權利收到的人。我們也可能請您提供有關您的請求的進一步資訊，以加快我們的回應。

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or exercise any of your rights. This is a security measure to ensure that your information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to expedite our response.

## 14. 隱私政策的變更

### Changes to our Privacy Policy

我們可能對隱私政策進行變更，且將在此頁面上發布該等變更。我們也可能在適當情況下透過電子郵件通知您，惟仍請您經常查閱此頁面以獲知隱私政策的任何變更。

We may make changes to our Privacy Policy and will post those changes on this page. We may also notify you by e-mail where appropriate, but you should check this page frequently for any changes to our Privacy Policy.