



**Adherence to the Privacy Policy, Treatment of Personal data, Code of ethics and Criminal  
Compliance Policy**

**保密政策、个人数据处理、行为道德承诺和刑事合规政策**

**遵循声明书**

This document is a unilateral statement by which the signer agrees to comply with the BIG Confidentiality Policy, is notified of the BIG Personal Data Treatment Policy and complies with the Code of Ethics and Compliance criminal Policy, as an indispensable requirement to carry out commercial operations with the companies of the group headed by Borges International Group, S.L.U.

本文件为单方声明，签署人承诺遵守博尔赫斯国际集团（BIG）的《保密政策》，承认已被告知博尔赫斯国际集团的《个人数据处理政策》，并同意遵守博尔赫斯国际集团的《道德准则》和《刑事合规政策》，以上文件是与博尔赫斯国际集团(Borges International Group, S.L.U.)旗下公司进行商业交易的基本要求。

Mr. or Ms. \_\_\_\_\_, on behalf of \_\_\_\_\_, (name or company name), with Tax number \_\_\_\_\_ (hereinafter referred to as the COMPANY), through the signing this document is considered notified of its content and assumes the obligations contained therein, in relation to BORGES INTERNATIONAL GROUP, SLU and all the companies that form part of the group under its auspice, which are listed in Annex I, hereinafter referred to as BIG:

\_\_\_\_\_先生/女士，代表\_\_\_\_\_（公司名称），税号（CIF）为\_\_\_\_\_（以下简称“当事公司”），通过签署本文件，承认他/她已经收到并承担本文件中所包含的与博尔赫斯国际集团公司（BORGES INTERNATIONAL GROUP, SLU）旗下所有公司（本文件附件一为所有集团公司名称清单）（以下简称“BIG”）有关的义务：

**Confidentiality**

**保密性**

The COMPANY agrees to the duty of secrecy and confidentiality with respect to all Confidential Information to which, directly or indirectly, the COMPANY and its personnel access and / or may have knowledge of or access to as a result of their relationship with BIG.

当事公司承诺对与 BIG 签订的合同关系所产生的信息严格保密；并承诺不披露此类机密信息；未经 BIG 事先同意，不直接或通过第三方人员或公司发布此类信息，或向第三方提供此类信息。

Confidential Information will be considered as any information which has been classified as exclusively or confidentially owned or which, by its nature or by the circumstances in which the disclosure or creation in good faith occurs, must be considered as such.

机密信息指的是所有未公开的信息，并且不能因违反本承诺而成为公开信息。

For its part, BIG assumes the same commitment of confidentiality with the information received from the COMPANY.

BIG 对从当事公司收到的信息作出同样的保密承诺。

### **Processing of personal data**

#### **个人数据处理**

In accordance with the provisions of the data protection regulations, the personal data provided by the COMPANY and its personnel will be processed by BIG for the administrative, accounting and fiscal management of the contractual relationship (including the entering into recruitment, management of payments and compliance with contractual obligations). The treatment carried out is necessary for the implementation of the contractual relationship, and consent is not necessary. Likewise, the data provided may be communicated, for strict compliance with legal obligations, to Public Administrations, courts and tribunals; to financial institutions, for the implementation of the contractual relationship; and third companies that are part of the group of parties for the proper administrative management of the recruitment processes.

根据数据保护条例规定，当事公司及其员工的个人数据将由 BIG 进行处理，用于合同关系的行政、会计和税务管理（包括合同的正式签订、付款管理和合同义务的履行）。该类处理是为执行合同关系所必需的，不需事先获得对方同意。同样，出于严格遵守法律义务的目的，所提供的数据可能会被传送给公共管理部门、法院和法庭；出于执行合同关系目的，可能会被传送给金融机构；出于对合同进行适当的行政管理目的，可能会被传送给属于当事方集团的第三方公司。

Similarly, personal data will be processed by BIG and by those companies to which it could subcontract all or part of the services, exclusively, for the carrying out of the same without it being understood in any circumstances that they hold the responsibility for this data.

同样，个人数据将由 BIG 以及获得其全部或部分服务分包的专门执行上述服务的公司处理；但在任何情况下，都不能理解为上述公司对个人数据负有责任。

The data will be processed during the contractual relationship and, subsequent to the same, until the prescription of the legal actions that derive from it.

这些数据将在合同关系期间和之后被处理，直到由此产生的法律行动规定的期限为止。

Interested parties may exercise the rights recognized by the applicable regulations (access, rectification, opposition, deletion, portability of data and limitation of processing), proving their identity, by writing to the address indicated in the heading or in the mail address [lopd@borges-big.com](mailto:lopd@borges-big.com).

相关方可以写信至指出的地址或发送电子邮件至 [lopd@borges-big.com](mailto:lopd@borges-big.com), 在证明自己的身份后, 行使适用法规所承认的权利 (访问、纠正、反对、删除、数据可携带性和处理限制)。

The management of your request will be handled under the terms established by the data protection legislation in force at the time of your request.

该类请求将根据提出请求时有效的数据保护法规定的条款进行处理。

BIG also acknowledges that the legislation regarding the protection of personal data sets forth a series of obligations in the processing of personal data, amongst which the prohibition of transferring of personal data without the corresponding authorisation of the holder of the personal data is stressed. For this purpose, BIG undertakes to:

BIG 承认, 《个人数据保护条例》规定了处理个人数据的一系列义务, 其中突出的一条是禁止在未经个人数据所有者相应授权的情况下转让个人数据。为此, BIG 承诺:

- Use the personal data to which they have access only and exclusively to fulfil its contractual obligations.  
仅仅为履行其合同义务而使用可以访问的个人数据。
- Observe and adopt all necessary security measures to ensure the confidentiality, secrecy and integrity of the personal data to which they have access, as well as to adopt in the future all security measures are required by the laws and regulations intended to preserve the secrecy, confidentiality and integrity in the automated processing of personal data.  
遵守并采取一切必要的安全措施, 以确保其所接触的个人数据的保密性、机密性和完整性, 并在今后采取法律和法规所要求的一切安全措施, 以保护自动处理个人数据的保密性、机密性和完整性。
- Not cede, under any circumstances, to third parties personal data to which they have access, not even for the purpose of conservation.  
在任何情况下都不向第三方转让可访问的个人数据, 即使是出于保存的目的。

The obligations established for BIG in this clause will also be mandatory for its employees, for which they will be liable for the breaches incurred by of its workers in this regard.

本条款中为 BIG 规定的义务对其员工也具有约束力, 因此, BIG 应对其员工在这方面的任何违规行为负责。

The duration of the confidentiality obligations established in this contract is 20 years, remaining in force subsequent to the termination, for any reason, of the relationship between the contracting parties.

本合同规定的保密义务期限为 20 年, 在合同双方关系因任何原因终止后仍然有效。

**Ethical commitment of conduct****行为道德承诺**

THE COMPANY states it has access to the following BIG documents:

当事公司声明可访问以下 BIG 的文件:

- Ethical Code of Conduct  
道德准则

<https://www.borgesinternationalgroup.com/reglamentos-y-politicas/>

- Criminal Compliance Policy  
刑事合规政策

<https://www.borgesinternationalgroup.com/reglamentos-y-politicas/>

In relation to these, THE COMPANY states its agreement with its terms and principles, committing itself to undertake conduct befitting of the same. These documents regulate matters of major importance for BIG, meaning that the substantial breach of THE COMPANY of its content will shall give grounds for just cause of termination, reserving for BIG the right to claim THE COMPANY for the damages that may be derived from its violation.

当事公司确认已阅读、理解以上文件，并表示对所有条款和原则表示同意，并承诺会据此发展其行为。当事公司承认，《道德规范》、《刑事合规政策》、《保密政策》和《个人数据处理政策》描述的是 BIG 与所有相关方开展活动的基础，因此，如果当事公司严重违反这些规定，将导致其与 BIG 之间的合同关系自动终止，并且 BIG 保留对当事公司因违反规定而造成的任何损失进行索赔的权利。

In witness thereof, I hereby accept this in \_\_\_\_\_, on the \_\_\_ of \_\_\_\_\_ of 20\_\_.  
特此声明，于 \_\_\_\_\_ (地点)，20\_\_年 \_\_\_\_\_月\_\_日签署。

THE COMPANY

当事公司

(Signature)

(签名)

**Annex I**

**附件一**

**Companies of the group headed by Borges International Group, S.L.U.**

**Borges International Group, S.L.旗下所属公司，按字母先后排序。**

Amêndoas - Herdade da Palheta II, Ltd.  
Amêndoas - Herdade da Palheta II, Ltd.  
BAIN - Mas de Colom, S.L.U.  
BAIN Andalucía, S.L.U.  
BAIN Extremadura, S.L.U.  
BMG Foods Shanghai Co. Ltd.  
Borges Agricultural & Industrial Edible Oils, S.A.U.  
Borges Agricultural & Industrial Nuts, S.A.  
Borges Asia Pte. Ltd.  
Borges Branded Foods, S.L.U.  
Borges do Brasil Alimentos Ltda.  
Borges Export Group, Inc.  
Borges for Food Industries Egypt  
Borges India Private Ltd.  
Borges National USA, Corp.  
Borges of California, Inc.  
Borges Organic Olive Oil Company  
Borges Tramier S.A.S.  
Borges USA, Inc.  
BSJ - Frutos Secos de Moura, S.A.  
BSJ2 - Amêndoas de Moura, S.A.  
Capricho Andaluz, S.L.  
Catering Distribution Services  
Framaco, S.A.  
OOO ITLV  
Ortalli, S.R.L.  
Société Borges Tunisie Export, S.A.