

Visitor's Privacy Policy

访客隐私政策

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Introduction

介绍

This Privacy Policy ("this policy") applies to the visitor registration services ("services") of any school of YEW CHUNG YEW WAH Education Network in mainland China ("School" or "we"). 本隐私政策("本政策")适用于耀中耀华教育网络中国大陆的任一学校(以下简称"学校"或"我们")的访客登记服务(简称"服务")。

We will collect, store, use, entrusted processing, co-processing, share, transfer, public disclose and deletion (Collectively referred to as "process") your personal information due to the needs of school safety management. We understand the importance of personal information to you. We will do our utmost to protect your personal information. We are committed to abide by the following principles to protect your personal information: the principle of consistency of rights and responsibilities, the principle of clear purpose, the principle of consent on item basis, the principle of minimization & necessity, the principle of security, the principle of subject participation, the principle of openness and transparency, etc. At the same time, we promise that we will take appropriate security measures to protect your personal information in accordance with the industry's mature security standards.

学校因校园安全管理需要, 将会收集、存储、使用、委托处理、共同处理、共享、转让、公开披露和删除(统称"处理")您的个人信息。我们深知个人信息对您的重要性, 并会尽全力保护您的个人信息安全可靠。我们恪守以下原则, 保护您的个人信息: 权责一致原则、目的明确原则、选择同意原则、最少必需原则、确保安全原则、主体参与原则、公开透明原则等。同时, 我们承诺, 我们将按业界成熟的安全标准, 采取相应的安全保护措施来保护您的个人信息。

In order to make this policy easy for you to understand, we try our best to explain and inform you in plain language. **For the clauses and the rules for processing personal sensitive information in this policy that we consider to be materially related to your rights and interests, we've marked them in bold to draw your special attention. Please read carefully and understand this policy before you agree to this policy.**

为了使本政策便于您理解, 我们尽力采用通俗易懂的文字表述向您进行说明和告知, **并就本政策中可能与您的合法权益存在重大关系的条款和敏感个人信息的处理规则, 采用字体加粗的方式以提请您的注意。烦请您在同意本隐私政策前仔细阅读并了解本隐私政策。**

Provision of Accurate Information

You should ensure that the personal information you provide is true and accurate. We will not assume any legal liability arising from any inaccurate, unauthorized or false information that you provide. If you provide any personal information that belongs to others, you must

ensure that their proper consent and authorization have been obtained.

提供准确的信息

您应确保您提供的个人信息真实准确。学校不承担因您提供的任何不准确、未经授权或虚假信息而产生的任何法律责任。如果您提供任何属于他人的个人信息，您必须确保已获得他们的适当同意和授权。

The terms listed below shall have the meaning designated:

1. Personal Information refers to various information, recorded in electronic or any other forms, that is related to an identified or identifiable natural person, excluding any information that has been anonymized.
2. Anonymization refers to the process in which personal information is handled so that it is impossible to identify certain natural persons and that it cannot be recovered.
3. **Personal sensitive information refers to personal information that, once leaked, illegally provided, or abused, may endanger personal and property safety, and easily lead to personal reputation, physical and mental health damage, or discriminatory treatment, including such information as biometric identification, religious belief, specific identity, medical health, financial account, whereabouts and tracks, as well as the personal information of minors under the age of 14.**

条款中列示的专用术语之定义如下：

1. 个人信息指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，不包括匿名化处理后的信息。
2. 匿名化是指个人信息经过处理无法识别特定自然人且不能复原的过程。
3. **敏感个人信息是指一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁未成年人的个人信息。**

If you have any doubts, comments, or advice about the content of this policy, you can contact us through the contact information at the end of this policy.

如对本政策内容有任何疑问、意见或建议，您可通过本政策文末的联系方式与我们联系。

This policy will help you understand the following:

1. How we collect and use your personal information
2. How we share, transfer, and publicly disclose your personal information
3. Entrusted processing and co-processing
4. How we store and protect your personal information
5. Your rights
6. How we update this policy
7. Others
8. How to contact us

本政策将帮助您了解以下内容：

1. 我们如何收集和使用您的个人信息
2. 我们如何共享、转让和公开披露您的个人信息
3. 委托处理与共同处理
4. 我们如何存储和保护您的个人信息
5. 您的权利

- 6. 本政策如何更新
- 7. 其他
- 8. 如何联系我们

1. How we collect and use your personal information

我们如何收集和使用您的个人信息

1.1 Collection of personal information

个人信息收集

We will collect your personal information when you fill out the school visitor registration Form, details as below:

我们将在您填写学校访客登记表时收集您的个人信息，详情如下：

Name, ID Number, phone number, Photo (Optional)

姓名，证件号码，手机号，照片（可选）

1.2 How we use your personal information.

我们如何使用您的个人信息

The purposes for which we use your personal information are set out below:

- **To verify the identity of you and ensure that only authorized individuals enter the school, thereby enhancing the safety of students and staff.**
- **To quickly contact you in case of emergencies, ensuring your safety and facilitating appropriate response measures.**
- **To enable quick school entry through facial recognition if you offer your photo.**
- **To comply with any regulatory, audit or security related requirements.**

我们在下方列出了主要使用您的相关个人信息的目的：

- **验证您的身份，确保只有授权人员可以进入校园，保障师生安全。**
- **在紧急情况下，学校可以迅速联系您，确保您的安全，并采取适当的应对措施。**
- **如果您提供照片，将通过人脸识别实现快速入校。**
- **遵守任何监管、审计或安全等相关要求。**

1.3 Exceptions

征得授权同意的例外

In accordance with the relevant laws, regulatory requirements, and national standards, we may process your personal information without seeking your separate consent or consent in any of the following circumstances:

- 1) Necessary for the school to perform its statutory duties or obligations.
- 2) Directly related to national security and national defense security.
- 3) Necessary to respond to public health emergencies, or to protect the life, health, and property safety of natural persons in emergencies.
- 4) Directly related to judicial or administrative law enforcement such as criminal investigation, prosecution, trial, and enforcement of judgments.
- 5) Your personal information is disclosed to the public on your own.

- 6) Collect or use personal information received & generated from legally and publicly disclosed information, such as legitimate news reports, government information publication or other channels.
- 7) Necessary for the performance of a contract in which the individual is a party.
- 8) Where such acts as news reporting and supervision by public opinions are carried out for the public interest, and the handling of personal information is within a reasonable scope.
- 9) Other circumstances stipulated by applicable laws and regulations.

根据相关法律法规规定和国家标准，以下情形中，我们处理您的个人信息无需事先征得您的授权同意：

- 1) 与我们履行法律法规规定的义务相关的；
- 2) 与国家安全、国防安全有关的；
- 3) 为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；
- 4) 与犯罪侦查、起诉、审判和判决执行有关的；
- 5) 您自行向社会公众公开的您的个人信息；
- 6) 从合法公开披露的信息中收集个人信息的，包括合法的新闻报道、政府信息公开渠道；
- 7) 为订立、履行个人作为一方当事人的合同所必需；
- 8) 为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；
- 9) 适用法律法规规定的其他情形。

2. How do we share, transfer and publicly disclose your personal information

我们如何共享、转让、公开披露您的个人信息

2.1 Sharing or transfer

共享或转让

We will not share or transfer your personal information with companies, organizations, and individuals other than this school, except in the following cases:

- 1) **With your explicit consent or active selection, we may share or transfer your personal information.**
- 2) **Share or transfer under legal circumstances.** We may share or transfer your personal information according to laws and regulations, litigation dispute resolution needs, or requirements of administrative and judicial authorities according to law.
- 3) **Where merger, acquisition or bankruptcy liquidation, or other situations involving mergers, acquisitions, or bankruptcy liquidation occurs for the school and the personal information is therefore transferred,** we will request the company or organization possessing your personal information to be sequentially bound by this policy and inform you of the name and contacts of such company or organization in a timely manner. Otherwise, we will request such company or organization to obtain your consent again.
- 4) **If necessary, the school may share your personal information to its affiliates or the third parties, we shall inform the personal information recipient's name, contact information, purpose of processing, method of processing and type of personal information, and shall obtain your separate consent. The school, its affiliates and the third parties will take reasonable and necessary protective measures to protect personal information under the requirements of laws and regulations.**

When the school shares your personal information with external organizations or individuals, the school will add confidentiality clauses in the contract signed with it, requiring them to strictly process your personal information according to relevant confidentiality and security measures.

我们不会与本校以外的任何公司、组织和个人共享或转让您的个人信息，但以下情况除外：

- 1) 在获得您的明确同意或授权或您主动选择的情况下共享或转让您的个人信息；
- 2) 在法定情形下的共享或转让。我们可能会根据法律法规规定、诉讼争议解决需要，或按行政、司法机关依法提出的要求，对外共享或转让您的个人信息；
- 3) 在学校发生合并、收购或破产清算情形，或其他涉及合并、收购或破产清算情形时，如涉及个人信息转让，我们会要求新的持有您个人信息的公司或组织继续受本政策的约束并及时向您告知该等公司或组织的名称和联系方式，否则我们将要求该公司或组织重新向您征求同意；
- 4) 如必需，学校可能会向其关联方或第三方共享您的个人信息，我们会向您告知个人信息接收方的名称、联系方式、处理目的、处理方式和个人信息的种类，并取得您的单独同意。学校、其关联方以及第三方均会根据法律法规的要求，采取合理必要的保护措施保护您的个人信息。

学校与外部组织或个人共享您的个人信息时，学校会在与其签署的合同中加入保密条款，要求他们按相关的保密和安全措施严格处理您的个人信息。

2.2 Public Disclose

公开披露

We will only disclose your personal information in the following cases:

- 1) **With your explicit consent or active selection, we may disclose your personal information to the public.**
- 2) Disclosure based on law: We may publicly disclose your personal information in the event of mandatory requirement of legal, legal procedure, litigation, or governmental agencies.

我们仅会在以下情况下，公开披露您的个人信息：

- 1) 获得您明确同意或基于您的主动选择，我们可以公开披露您的个人信息；
- 2) 基于法律的披露：在法律、法律程序、诉讼或政府主管部门强制性要求的情况下，我们可能会公开披露您的个人信息。

3. Entrusted processing and co-processing

委托处理与共同处理

In order to provide better services to you, we may authorize our related parties, vendors and service providers ("entrusted party") to provide some services to you. We will only authorize the entrusted party to process your 's information for lawful, legitimate, necessary, specific and defined purposes.

为了更好地为您提供服务，我们可能授权关联方、委托供应商和服务提供商（下称“受托方”）为您提供某些服务。我们仅会出于合法、正当、必要、特定、明确的目的委托受托方处理您的信息。

We will strictly limit the purposes for which the entrusted party processes information and require the entrusted party to implement adequate data security measures. We will sign requisite confidentiality agreements with our entrusted parties and require them to process

personal information in accordance with our requirements, personal information protection policies, and any other relevant confidentiality and security measures.

我们会严格限制受托方的信息处理目的并要求受托方采取充分的数据安全保障手段。我们会与受托方签署必要的保密协议，要求他们按照我们的要求、个人信息保护政策以及其他任何相关的保密和安全措施来处理个人信息。

If the entrusted party use your information for any purpose which we have not authorized, or fails to effectively perform its responsibility to protect the security of personal information, we will immediately require the entrusted party to stop the relevant actions, and to take effective remedial measures to control or eliminate the security risk to personal information, such as changing passwords, withdrawing authority, disconnecting from the network, etc. If necessary, we will terminate the business relationship with the entrusted party and request the entrusted party to delete the personal information obtained from us in a timely manner.

如果受托方将您的信息用于我们未委托的用途，或未能有效履行个人信息安全保护责任的，我们会立即要求其停止相关行为，并采取有效补救措施（如更改密码、回收权限、断开网络连接等）控制或消除个人信息面临的安全风险。必要时我们会终止与受托方的业务关系，并要求受托方及时删除从我们处获得的个人信息。

Under co- processing scenarios, we will sign relevant agreements with our related parties, vendors and service providers in accordance with the requirements of laws and regulations, and perform relevant personal information protection obligations.

在共同处理场景下，我们会按照法律法规要求与关联方、供应商和服务提供商签署符合法律法规要求的相关协议，并履行相关个人信息保护义务。

4. How do we store and protect your personal information

我们如何存储和保护您的个人信息

4.1 Storage

存储

The personal information we collect and generate within the mainland China will be stored in mainland China.

我们在中华人民共和国境内收集和产生的个人信息，将存储在中华人民共和国境内。

The information you provide to us may be archived or stored periodically by us according to backup processes and the retention period of personal information shall be the minimum period necessary for the purposes for which it was collected, to provide our services to you, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

您提供给我们的信息可能会由我们根据备份流程定期存档或储存，并且保留的时间为收集该等信息的目的、向您提供我们的服务、解决争议、建立法律抗辩、执行审计、追求合法的商业目的、执行我们的协议和遵守适用法律所必要的最短时间。

Upon the expiration of the retention period, or your information is no longer needed for the purposes of this policy, or when it is not required to be retain in accordance with relevant laws and regulations, in addition to retaining evidence of notification and consent, the school will take reasonable steps and safe mode to remove personal information or make it unrecognizable and cannot be edited, modified or used again.

在保存期限届满或您的信息已经不再需要用于实现本隐私政策规定的目的和用途，也无需根据相关法律法规的规定保存时，除留存告知和同意的证据外，学校将采取合理步骤以安全的方式销毁个人信息或使其不可识别并不可被再次编辑、修改、使用。

4.2 Protection

保护

We have used industry-standard security measures to protect the personal information you provide to prevent unauthorized access, public disclosure, use, modification, damage or loss of data. We will take all reasonable and feasible actions to protect your personal information. For example, when you exchange data between your browser and the “service”, you are protected by SSL encryption; in the meantime, we also provide https secure browsing for school website; we will use trusted protection mechanisms to protect against malicious attacks; we deploy access control mechanisms to ensure that only authorized personnel have access to personal information; and we conduct security and privacy protection training courses to enhance employee awareness of the importance of protecting personal information.

我们已使用符合业界标准的安全防护措施保护您提供的个人信息，防止数据遭到未经授权访问、公开披露、使用、修改、损坏或丢失。我们会采取一切合理可行的措施，保护您的个人信息。例如：在您的浏览器与“服务”之间交换数据时受 SSL 加密保护；我们同时对学校网站使用 https 安全浏览方式；我们会使用受信赖的保护机制防止数据遭到恶意攻击；我们会部署访问控制机制，确保只有授权人员才可访问个人信息；以及我们会举办安全和隐私保护培训课程，加强员工对于保护个人信息重要性的认识等。

We have established special management systems, procedures, and organizations to ensure the security of information. We strictly limit the scope of persons who can access the information, require them to undertake confidentiality obligations.

我们建立专门的管理制度、流程和组织以保障信息的安全，严格限制访问信息的人员范围，要求他们遵守保密协议。

The Internet environment is not 100% secure, and we will do our best to ensure or guarantee the security of any information you send to us. If our physical, technical, or administrative protection is damaged, which results in unauthorized access, public disclosure, alteration, or destruction of information and further impairs your legitimate right, we would undertake corresponding legal liabilities.

互联网环境并非百分之百安全，我们将尽力确保或担保您发送给我们的任何信息的安全性。如果我们的物理、技术或管理防护设置遭到破坏，导致信息被非授权访问、公开披露、篡改或者毁坏，导致您的合法权益受损，我们将承担相应的法律责任。

In accordance with the requirements of laws and regulations, in the occurrence of any personal information security incident (including information loss, damage, leakage, tampering etc.), we will promptly notify you of the following in accordance with laws and regulations: basic information about the security incident and its potential impact, treatment measures we have taken or will take, suggestions about proactive defense and risk mitigation, remedial measures etc. We will promptly let you know the relevant situations of the incident by means of mail, letter, phone call, push notification etc. We will issue announcements in a reasonable and effective manner when having difficulty in reaching out to each personal information subject.

按照法律法规的要求，在您的个人信息不幸发生遗失、损毁、泄露或被篡改等安全事件后，我们将及时向您告知安全事件的基本情况和可能的影响、我们已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。我们将及时将事件相关情况以邮件、信函、电话、推送通知等方式告知您，难以逐一告知个人信息主体时，我们会采取合理、有效的方式发布公告。

Meanwhile, we will also report the handling status of personal information security incidents as required by regulatory authorities.

同时，我们还将按照监管部门要求主动上报个人信息安全事件的处置情况。

5. Your Rights

您的权利

In accordance with mainland China's relevant laws, regulations, standards, and the common practice of other countries and regions, we guarantee you the following rights of your personal information:

按照中国相关法律、法规、标准，以及其他国家、地区的通行做法，我们保障您对您的个人信息行使以下权利。

5.1 Access to your personal information

访问您的个人信息

You are authorized to access your personal information, except for some circumstances stipulated by law and regulations. You could, after identity verification, exercise your right of data access through the following methods:

- 1) If you want to access your personal information, you can always contact us through the contact information at the end of this policy. We will respond to your request within 15 business days.
- 2) We will provide you with other personal information generated during your use of our services so long as it is within the scope of our services.

您有权访问您的个人信息，法律法规规定的例外情况除外。在验证您的个人身份后，您可以通过以下方式行使数据访问权：

- 1) 如果您想访问您的个人信息，您可以随时使用本政策文末的联系方式与我们联系。我们最迟在 15 个工作日内回复您的访问请求；
- 2) 对于您在使用我们的服务过程中产生的其他个人信息，我们会在业务服务范围内向您提供。

5.2 Correct your personal information.

更正您的个人信息

When you identify any error in your personal information by our process, you are entitled to require us to make the correction. You can raise a correction application by using the methods listed in “(6.1) Access to your personal information”.

当您发现我们处理的关于您的个人信息有错误时，您有权要求我们做出更正。您可以通过“5.1 访问您的个人信息”中罗列的方式提出更正申请。

5.3 Delete your personal information.

删除您的个人信息

Under the following circumstances, you can request us to delete your personal information:

- 1) If our processing of personal information violates any law or regulation.
- 2) If we collect or use your personal information without your consent, or if you withdraw your consent.
- 3) If our processing of personal information breaches our agreement with you;
- 4) If you no longer use our services, or you cancel your account.
- 5) If we no longer provide services to you.

在以下情形中，您可以向我们提出删除您个人信息的请求：

- 1) 如果我们处理个人信息的行为违反法律法规；
- 2) 如果我们收集、使用您的个人信息，却未征得您的同意，或者您撤回了您的同意；
- 3) 如果我们处理个人信息的行为违反了与您的约定；
- 4) 如果您不再使用我们的服务，或您注销了账号；
- 5) 如果我们不再为您提供服务。

Where the storage period stipulated by law or administrative regulation has not expired, or deletion of personal information is technically hard to accomplish, we will cease the processing of personal information other than storing and taking necessary security protection measures for such information. We will respond to your request of deletion in accordance with applicable laws or regulations, we will also notify the entity(ies) which obtained your personal information from us and request them to delete such information in a timely manner, unless otherwise stipulated under laws or regulations, or if these entity(ies) has(have) obtained your separate authorization.

法律、行政法规规定的保存期限未届满，或者删除个人信息从技术上难以实现的，我们会停止除存储和采取必要的安全保护措施之外的处理。我们会根据适用的法律法规来响应您的删除请求，我们还将同时通知从我们获得您的个人信息的实体，要求其及时删除，除非法律法规另有规定，或这些实体获得您的独立授权。

When you delete information from our service system, we may not immediately delete the corresponding information in our backup system immediately, but we will delete it when the backup is updated. In the meantime, we can retain the evidence of notification and consent. 当您从我们的服务系统中删除信息后，我们可能不会立即在备份系统中删除相应的信息，但会在备份更新时删除这些信息。同时，我们可以留存告知和同意的证据。

If you want to delete your personal information, you can always contact us through the contact information at the end of this policy.

如果您想删除您的个人信息，您可以随时使用本政策文末的联系方式与我们联系。

5.4 Change your authorization scope.

改变您授权同意的范围

Each business function requires certain basic personal information to be provided. You could grant or withdraw your authorization & consent at any time for the collection and use of the additionally collected personal information.

每个业务功能需要一些基本的个人信息才能得以完成。对于额外收集的个人信息的收集和使用，您可以随时给予或收回您的授权同意。

If you want to change your authorization scope, you can always contact us through the contact information at the end of this policy.

如果您想改变您授权同意的范围，您可以随时使用本政策文末的联系方式与我们联系。

When you withdraw your consent, we will no longer process your corresponding personal information. However, this decision to withdraw your authorization will not affect personal information processing upon your previous authorization.

当您收回同意后，我们将不再处理相应的个人信息。但您收回同意的决定，不会影响此前基于您的授权而开展的个人信息处理。

5.5 Personal information owners obtain copies of their personal information

个人信息主体获取个人信息副本

You have the right to obtain a copy of your personal information, you can always contact us through the contact information at the end of this policy.

您有权获取您的个人信息副本，您可以随时使用本政策文末的联系方式与我们联系。

5.6 Constraint information systems automated decision making

约束信息系统自动决策

In some business functions, we may make decisions based on non-human automated decision-making mechanisms, including information systems, algorithms, etc. If these decisions affect your legal rights, you have the right to seek an explanation from us and we will provide appropriate remedies.

在某些业务功能中，我们可能仅依据信息系统、算法等在内的非人工自动决策机制做出决定。如果这些决定影响您的合法权益，您有权要求我们作出解释，我们也将提供适当的救济方式。

5.7 Responding to your above request.

响应您的上述请求

For security reasons, you may need to provide a written request or prove your identity when you make inquiries, submit for changes, deletion of your Information, and change authorization scope. We may ask you to verify your identity before processing your request. We will respond to you within 15 business days.

为保障安全，您申请查询、变更、删除信息、变更授权时可能需提供书面请求，或以其他方式证明您的身份。我们可能会先要求您验证自己的身份，然后再处理您的请求。我们将在15个工作日内做出答复。

Even if we delete your personal information upon your request or you successfully withdraw your authorization, we still have the right to retain and use anonymized data that we have collected based on your earlier authorization. Such anonymized data will not be personally identifiable.

即使我们应您的要求删除了您的个人信息，或者您成功地撤回了您的授权，我们仍然有权保留和使用我们根据您的授权收集的匿名数据。该等匿名数据不会识别个人身份。

In principle, we do not charge for your reasonable request, however, for those repetitive, beyond reasonable requests, we may charge a fee as appropriate. For those unreasonably repetitive requests which need too excessive technical means (for example, need to develop

new systems or fundamentally change existing practices), pose risks to others' legal rights, or are very impractical (for example, involving information stored on backup tapes), we may reject such requests.

对于您合理的请求，我们原则上不收取费用，但对多次重复、超出合理限度的请求，我们将视情况收取一定成本费用。对于那些无端重复、需要过多技术手段（例如，需要开发新系统或从根本上改变现行惯例）、给他人合法权益带来风险或者非常不切实际（例如，涉及备份磁带上存放的信息）的请求，我们可能会予以拒绝。

We will not be able to respond to your request in the following cases:

- 1) In connection with the fulfillment of obligations under laws and regulations by the controller of personal information.
- 2) Directly related to national security, national defense security.
- 3) Directly related to public safety, public health, and vital public interests.
- 4) Directly related to criminal investigation, prosecution, trial and execution of judgments, etc.
- 5) Where the controller of personal information has sufficient evidence of subjective malice or abuse of rights by the owner of the personal information.
- 6) For the purpose of safeguarding the life, property and other significant legitimate rights and interests of the owner of personal information or other individuals but where it is difficult to obtain the consent of the owner.
- 7) When responding to the request of the owner of personal information will result in serious damage to the legitimate rights and interests of the owner of personal information or other individuals or organizations.
- 8) Where commercial secrets are involved.

在以下情形中，我们将无法响应您的请求：

- 1) 与个人信息控制者履行法律法规规定的义务相关的；
- 2) 与国家安全、国防安全直接相关的；
- 3) 与公共安全、公共卫生、重大公共利益直接相关的；
- 4) 与刑事侦查、起诉、审判和执行判决等直接相关的；
- 5) 个人信息控制者有充分证据表明个人信息主体存在主观恶意或滥用权利的；
- 6) 出于维护个人信息主体或其他个人的生命、财产等重大合法权益但又很难得到本人同意的；
- 7) 响应个人信息主体的请求将导致个人信息主体或其他个人、组织的合法权益受到严重损害的；
- 8) 涉及商业秘密的。

6. How we update this policy

本政策如何更新

As we provide more information and services and as privacy laws and regulations change, we may need to revise or update this policy from time to time. But we will not undermine your rights entitled under this policy without your explicit consent. We will notify you of changes to this policy through announcements/notifications, etc.

随着我们提供更多信息和服务，以及隐私法律、法规的变化，我们会需要不时地修改或更新本政策，但未经您明确同意，我们不会削减您按照本政策所应享有的权利。我们会通过发布/通知等方式使您了解本政策所做的变更。

For significant changes, we also provide more noticeable notices (**we will send a notification via email stating the specific changes to this policy**). If you do not agree with the updated terms and conditions or have any doubts about this updated policy, please contact us through the contact information at the end of the policy.

Significant changes referred hereunder include but not limited to:

- 1) Major changes in our service model, such as changes in relations to the purpose of processing personal information, the way in which personal information is used, etc.
- 2) Significant changes to our ownership structure, organizational structure, etc. such as changes of ownership due to business restructuring, acquisitions, or insolvency, etc.
- 3) Changes in the main objects of personal information sharing, transfer, or public disclosure.
- 4) Major changes in your rights to participate in the processing of personal information and the way you exercise such rights.
- 5) Changes in the department, contact information and complaint channels responsible for personal information security.
- 6) Personal information security impact assessment report indicates that there is a high risk.

对于重大变更，我们会提供更为显著的通知（我们会通过电子邮件发送通知，说明本政策的具体变更内容）。如果您不同意更新后的条款内容或对新的隐私政策有任何疑问，可使用本隐私政策文末的联系方式与我们联系。

本政策所指的重大变更包括但不限于：

- 1) 我们的服务模式发生重大变化导致诸如处理个人信息的目的、个人信息的使用方式的变更等；
- 2) 我们在所有权结构、组织架构等方面发生重大变化。如业务调整、并购、破产等引起的所有者变更等；
- 3) 个人信息共享、转让或公开披露的主要对象发生变化；
- 4) 您参与个人信息处理方面的权利及其行使方式发生重大变化；
- 5) 我们负责处理个人信息安全的责任部门、联络方式及投诉渠道发生变化；
- 6) 个人信息安全影响评估报告表明存在高风险。

We will also archive the previous versions of this policy for your reference.

我们还会将本政策的旧版本存档，供您查阅。

7. Others

其他

This policy is written in both Chinese and English languages. In the event of any discrepancy between the English and Chinese versions, the Chinese version shall prevail.

本隐私政策用中文和英文书就，若英文文本和中文文本有任何不一致，以中文文本为准。

8. How to contact us

如何联系我们



If you have any questions, comments, or suggestions about this policy, or require to access, update, rectify, delete or withdraw your personal information, **please contact us through the contact information as below**, we will reply within about **15** working days after receiving your request:

Email: privacy@ycyw.cn

如您对本政策存在疑问，或有相关的投诉、意见或需查阅、更新、更正、删除或者撤回您的个人信息，可以通过以下方式与我们联系，我们将在 **15** 个工作日内回复您的请求：

电子邮箱： privacy@ycyw.cn