

Privacy Policy

隐私政策

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Introduction

介绍

This Privacy Policy ("this policy") applies to the recruitment application services (including registration, interview, background check, health check-up, apply for a visa etc.) ("service") of any school and management company ("we") of YEW CHUNG YEW WAH Education Network.

本隐私政策（以下简称“本政策”）适用于耀中耀华教育网络的任何一所学校和管理公司（以下简称“我们”）的招聘申请服务（包括注册、面试、背景调查、体检、办理签证等）（以下简称“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 provide recruitment application services to you. 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.

我们因向您提供招聘申请服务，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利益存在重大关系的条款和敏感个人信息处理规则**，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。我们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 use Cookie
3. How we share, transfer, and publicly disclose your personal information
4. Entrusted processing and co-processing
5. How we store and protect your personal information
6. Your rights
7. Rules for processing personal information of minors
8. How we update this policy
9. Others
10. 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. 我们如何使用 Cookie
3. 我们如何共享、转让和公开披露您的个人信息
4. 委托处理与共同处理
5. 我们如何存储和保护您的个人信息
6. 您的权利
7. 涉及未成年人个人信息的处理规则
8. 本政策如何更新
9. 其他
10. 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

When you apply for a position through our official recruitment system or social media channels (such as WeChat) or other method (such as email) , we may collect the following personal information from you:

当您通过我们官网的招聘系统或社交媒体渠道（如微信）或其他方式(如邮件)应聘一个职位时，我们可能会收集您的以下个人信息：

Name, **Email**, **account password** (just collected when you register our recruitment system), Resume Information (mainly include **phone**, education background, Certificate and work experience and so on), spouse and children's personal information (just collected when you apply for job entry visa).

姓名，**邮箱**，**账号密码**（仅在您注册我们的招聘系统时收集），简历信息（主要包括**电话**、教育背景、证书和工作经历等信息）。

Maybe we will collect other information to assess your suitability for the role you have applied for during the process of interview.

我们可能在面试过程中还会收集其他信息用于评估您是否适合您申请的职位。

If you receive an offer of employment, you may be asked whether you are willing to undergo background or criminal record checks and/or a medical examination as permitted by applicable law. Your information may be collected from third parties, such as in connection with background checks or employment verification where permitted by applicable law.

如果您获得了一份聘用函，您可能会被询问是否愿意接受适用法律允许的背景或犯罪记录调查和（或）体检。您的信息可能从第三方收集，例如在适用法律允许的情况下，与背景调查或雇佣确认有关信息。

If you accept our offer and need us to assist in applying for visas for you, your spouse and your children, we may collect additional personal information about you, your spouse and your children, such as **copy of passport**, degree certificate, notarization of academic qualifications, resume, certificate of resignation from your previous company, etc.

如果您接受我们的 offer 并需要我们帮忙为您、您配偶以及孩子办理签证时，我们可能需要收集您、您配偶以及孩子的其他个人信息，如**护照复印件**，学历证明，公证，上家公司的离职证明等。

1.2 How we use your personal information.

我们如何使用您的个人信息

We will use your personal information in strict accordance with relevant laws and our regulations. We will keep and use your personal information properly and will not illegally

provide and sell it to the third party. **The main purposes for which we use personal information about you are set out below:**

- **Manage your application for employment.**
- **Contact you during your candidacy, send you announcements, or request additional information as required.**
- **To assess your suitability for the role you have applied for.**
- **Build a relationship with you and learn more about your career interests.**
- **Join our talent pool for management.**
- **Assist in applying for visas as you need.**
- **To comply with any regulatory, audit or security related requirements.**
- **Any other purposes related to our human resources management.**

我们对于您的个人信息的使用严格依据相关法律和我们的规定进行。我们会妥善保管和使用您的个人信息，不会非法提供、出售给第三方。我们会合法、正当、必要地使用您的个人信息，使用用途主要如下：

- **管理您的工作申请；**
- **在您作为候选人期间联系您、给您发送通知或在有需要时向您索取额外信息；**
- **用于评估您是否适合您申请的职位；**
- **与您建立关系，了解您的职业兴趣；**
- **加入我们的人才库进行管理；**
- **根据您的需要，协助办理签证；**
- **遵守任何监管、审计或安全等相关要求；**
- **与我们人力资源管理相关的其他目的。**

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 us 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 we use Cookie

我们如何使用 Cookie

Sometimes we will store small data files called Cookie on computers or mobile devices to make sure our services operate properly. Cookie refers to plain text files stored on a computer or mobile device by a network server, and the contents of a Cookie can only be retrieved/read by the server that created it. Each Cookie is unique to your web browser or mobile application. Cookie usually contains identifiers, site names and some numbers and characters.

为确保我们的服务正常运转，我们有时会在您的计算机或移动设备上暂时存储名为 Cookie 的小数据文件。Cookie 是一种网络服务器存储在计算机或移动设备上的纯文本文件。Cookie 的内容只能由创建它的服务器检索或读取。每个 Cookie 对您的网络浏览器或移动应用程序都是唯一的。Cookie 通常包含标识符、站点名称以及一些号码和字符。

We use Cookie to improve your experience when visiting and using our services, as Cookie enables our services to remember your single visit (using session Cookie) or multiple visits (using permanent Cookie), as well as saving your browsing settings such as language, font

size, and other browsing preference on your computer or mobile devices. This means that you do not need to reconfigure your preferences each time when visiting or using our services. We do not use Cookies for purposes other than those indicated in this statement. You can manage or delete Cookies according to your preferences, or you can delete all Cookies stored on your computer or mobile device. However, please note that by doing so, you will need to change your user settings by yourself every time you visit or use our services.

我们启用 Cookie 的目的在于改善您的访问和使用服务的体验。借助于 Cookie，我们的服务能够记住您的单次访问（使用会话 Cookie）或多次访问（使用永久 Cookie），并保存您的偏好设置，例如计算机或移动设备的语言、字体大小和其他浏览偏好。这意味着，您无需在每次访问或使用重新配置用户偏好设置。我们不会将 Cookie 用于本政策所述目的之外的任何用途。您可根据自己的偏好管理或删除 Cookie。您可以清除计算机或移动设备上保存的所有 Cookie，但如果您这么做，您将需要在下一次访问或使用我们的服务时重新配置用户偏好设置。

3. 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

3.1 Sharing or transfer

共享或转让

We will not share or transfer your personal information with companies, organizations, and individuals other than us, 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 us 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, we may share your personal information to 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. We, affiliates and the third parties will take**

reasonable and necessary protective measures to protect personal information under the requirements of laws and regulations.

When we share your personal information with external organizations or individuals, we 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.

我们不会与我们以外的任何公司、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) **在我们发生合并、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，我们可能会向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。**我们、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。

我们与外部组织或个人共享您的个人信息时，我们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。

3.2 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。

4. 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 personal 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.

如果受托方将您的个人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。

5. How do we store and protect your personal information

我们如何存储和保护您的个人信息

5.1 Storage

存储

In principle, the personal information we collect and generate will be stored in mainland China, including your application for a position at our Hong Kong school or management company. 原则上，我们收集和产生的个人信息，将存储在中华人民共和国境内,包括您申请我们香港学校或管理公司的职位。

If, due to business requirements, your personal information needs to be provided or transferred to outside of mainland institutions or individuals, we will obtain your consent in advance, inform you of the purpose and recipient of such transfer etc., and complied with the procedure as required by the relevant laws and regulations.

如因业务需要向大陆以外机构或个人提供或传输您的个人信息，我们会事先征得您的同意，告知信息出境的目的、接收方等情况，并履行相关法律法规规定的程序。

Foreign jurisdictions may have different personal information protection laws or even no such laws. In such cases, we will ensure that your personal information is adequately protected to the same extent as in the mainland China.

境外辖区可能设有不同的数据保护法，甚至未设立相关法律。在此类情况下，我们会确保您的个人信息得到在中华人民共和国境内足够同等的保护。

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, we 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，我们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。

5.2 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 our 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；我们同时对我们网站使用 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 is not an absolutely secure environment. Please use complex passwords and do not disclose your personal information to others to help us keep your account secure. Any leakage of personal information resulting from the disclosure of your password to or sharing of your account with others by yourself, we shall not undertake legal liabilities.

互联网并非绝对安全的环境，请使用复杂密码，不向其他人透漏您的个人信息，以协助我们保护您的账号安全。由于您将用户密码告知他人或与他人共享注册账户所导致的任何个人信息泄露，我们不承担任何法律责任。

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。

6. Your Rights

您的权利

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

按照中国或香港相关法律、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。

6.1 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 login related system by system account and password.
- 2) If you are unable to access your personal information via the method above, 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.
- 3) 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) 如果您希望访问您的个人信息，您可以通过使用您的用户名和密码登录到相关系统进行查看；
- 2) 如果您无法通过上述方式访问您的个人信息，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；
- 3) 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。

6.2 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“6.1 访问您的个人信息”中罗列的方式提出更正申请。

6.3 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。

6.4 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。

6.5 Account Cancellation

个人信息主体注销账户

If you want to cancel your previously registered accounts, you can always contact us through the contact information at the end of this policy.

如果您想注销此前注册的账户，您可以随时使用本政策文末的联系方式与我们联系。

Upon cancellation of your account, we will stop providing services to you and, at your request, we will delete your personal information, except as otherwise required by law or regulation, and the retention of evidence of notification and consent.

在注销账户之后，我们将停止为您提供服务，并依据您的要求，删除您的个人信息，法律法规另有规定的，以及留存告知和同意的证据除外。

6.6 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。

6.7 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。

6.8 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, change authorization scope and account cancellation. 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、注销账户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先前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。

7. Rules for processing personal information of about minors

涉及未成年人个人信息的处理规则

We place great importance to the protection of minor's personal information. Based on the content of our services, we do not provide services to minors and do not proactively collect personal information from minors. If you are a minor, please inform your guardian or legal representative immediately and be accompanied by your guardian or legal representative to terminate the use of the service and please do not provide any personal information.

我们重视未成年人的信息保护。基于我们服务的内容，我们不会向未成年人提供服务，不会主动收集未成年人的个人信息。如您为未成年人，请您立即告知您的监护人或法定代理人，由监护人或法定代理人陪同立即终止使用服务，并请勿提供任何个人信息。

We will only collect and use minor's personal information in strict compliance with the relevant laws and regulations and this policy provided that authorization and consent of the minor's parent or guardian has been obtained. We will not collect minor's personal information unrelated to the services. If we find that we have collected personal information from a minor

without the prior consent of the minor's parent or guardian, we will try to delete the relevant data as soon as possible.

我们将仅在获取未成年人父母或监护人授权同意的前提下, 严格按照相关法律法规和本隐私政策的规定收集、使用未成年人个人信息, 我们不会收集与服务无关的未成年人个人信息。如果我们发现自己在未事先获得未成年人父母或监护人同意的情况下收集了未成年人的个人信息, 则会设法尽快删除相关数据。

Our services are targeted at adults. Minors under the age of 14 may not create their own user accounts without the consent of their parents or guardians.

我们的服务面向成年人。如果没有父母或监护人的同意, 未满 14 周岁的未成年人不得创建自己的用户账号。

For the collection of personal information of minors under the age of 14 with parental consent, we will only use or disclose such information when permitted by law, with explicit consent from the parents or guardians, or when necessary to protect the children.

对于经父母同意而收集未满 14 岁未成年个人信息的情况, 我们只会在受到法律允许、父母或监护人明确同意或者保护儿童所必要的情况下使用或公开披露此信息。

If we find that we have collected personal information of children without verified parental consent, we will endeavor to delete such data as soon as possible.

如果我们发现自己在未事先获得可证实的父母同意的情况下收集了儿童的个人信息, 则会设法尽快删除相关数据。

8. 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。

9. 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。

10. 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: ycywcareers@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： ycywcareers@ycyw.cn