# **Privacy Statement**

# 隐私声明

#### 1. Introduction

## 引言

This privacy statement describes how Shengyi Culture Consulting (Beijing) Co., Ltd. (圣艺文化咨询(北京)有限公司) ("**Trinity**", "**we**", "**our**" or "**us**") processes your personal information that we collect when you visit the Trinity China website https://www.trinitycollegecn.com/ (the "**Site**") and interact with us online through the Site.

本隐私声明对圣艺文化咨询(北京)有限公司(简称"**Trinity**"或"**我们**")如何处理我们在您访问 **Trinity** 中国网站(网址: https://www.trinitycollegecn.com/,简称"**网站**")以及通过网站与我们在线互动时收集的您的个人信息进行了说明。

In this privacy statement, "personal information" refers to all kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding anonymized data. For the purpose of this privacy statement, "PRC" or "China" means the mainland of the People's Republic of China and does not include Hong Kong, Macau and Taiwan.

在本隐私声明中,"**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。就本隐私声明而言,"中**国**"指中华人民共和国大陆地区,不包括香港、澳门和台湾。

Access to the Site and the use of information contained in the Site is governed by its Terms of Use. If you order products or register for training you may also be subject to specific terms and conditions. The contents of the Site, including its terms and conditions, are subject to change by us without notification to you. We accept no responsibility or liability for keeping the information on the Sites up to date or for any failure to do so.

访问网站和使用网站内包含的信息,受到网站使用条款的管辖。如果您订购产品或注册培训课程,您还可能受到特定条款和条件的约束。我们可以变更网站的内容(包括其条款和条件)而无需通知您。我们不负责确保网站上的信息是最新信息,并且,如果网站上的信息不是最新信息,我们概不承担任何责任。

We are not responsible for the content or privacy practices of other websites. Any external links to other websites are clearly identified as such. 我们对其他网站的内容或隐私做法不予负责。对于与其他外部网站的任何链接,我们会明确指明。

#### 2. Our role

## 我们的角色

Trinity is the data controller (i.e., the personal information processor as defined under the Personal Information Protection Law of China ("PIPL")) in respect of any personal information we collect about you when you use our Site. As a data controller, we are committed to protecting your privacy at all times in accordance with all applicable laws and regulations governing the use or processing of personal data, including without limitation the Cybersecurity Law of the PRC, the Personal Information Protection Law of the PRC, Data Security Law of the PRC and relevant implementation rules, specifications and national standards on data protection).

对于我们在您使用我们的网站时收集的有关您的任何个人信息,Trinity 属于数据控制者(即中国《个人信息保护法》项下定义的个人信息处理者)。作为数据控制者,我们致力于根据所有适用的个人信息使用或处理方面的法律法规始终保护您的隐私,包括但不限于中国《网络安全法》、中国《个人信息保护法》、中国《数据安全法》以及有关信息保护的相关实施细则、规范和国家标准。

# 3. When and what personal information do we collect?

我们何时收集个人信息以及收集什么个人信息?

#### (a) When you visit our Site

当您访问我们的网站时

The information collected about your visits to our Site is usually limited to personal information such as:

我们收集的关于您访问我们网站的信息通常仅限于如下个人信息:

 the internet address (or IP address) of the device you used to access the Site; 您用于访问网站的设备的互联网地址(或称 IP 地址);

 whether you reached the Site using a search engine or if you clicked a link on another website;

您是否使用搜索引擎到达网站,或您是否点击了另一个网站上的链接;

the type of web browser you used; and

您使用的网络浏览器类型: 以及

the type of device you used to access the internet.

您用于访问互联网的设备类型。

We use this data for administrative and statistical purposes as well as to help us improve our Site.

我们将此类信息用于管理和统计目的,并帮助我们改进网站。

The Site may use internet browser cookies which may also collect your personal information. For further information on internet browser cookies please see paragraph 5 on Cookies below.

网站可能会使用网络浏览器 cookie,这些 cookie 也可能会收集您的个人信息。关于网络浏览器 cookie 的更多详情,请参见下文第 5 条关于 cookie 的内容。

#### (b) Information you give to us directly

#### 您直接提供给我们的信息

We will collect certain personal information about you when you interact with us, for example when you complete an online form on our Site (including our online 'Contact Us' forms or forms filled in to participate in a Trinity event or webinar, or when you respond to a survey or send us an email or contact us by other means and/or when you subscribe to our newsletter).

当您与我们互动时(例如当您在我们网站上填写在线表单时,包括我们的在线"联系我们"表单或参加 Trinity 活动或网络研讨会需填写的表单,或当您回复一项调查或向我们发送电子邮件或通过其他方式联系我们时,和/或当您订阅我们的简讯时),我们会向您收集与您相关的某些个人信息。

We may collect the following information from you:

我们可能会收集您的以下信息:

 your full name and contact details, including email address, postal address, telephone number;

您的全名和联系方式,包括电子邮件地址、邮寄地址、电话号码;

profile information if you register on our Site; and/or

个人资料中的信息(如果您在我们的网站上注册);及/或

• information about your communication preferences.

有关您的通讯偏好的信息。

#### (c) Information we obtain indirectly

我们间接获得的信息

Your personal information (as listed above) may also be shared with us by third parties. For instance, we may receive it from your training provider, validated course provider, validated course and assessment provider, exam service provider, parent or guardian.

(上文所列的)您的个人信息也可能由第三方与我们共享。例如,我们可能会从您的培训提供商、验证课程提供商或验证课程和评估提供商、考试服务提供商、父母或监护人处收到这些信息。

#### 4. Sensitive Personal Information

## 敏感个人信息

Some of the information we collect from you (such as, your identity documentation) may contain or be considered as sensitive personal information. We will make sure that the processing of your sensitive personal information is necessary to achieve the specific purposes as described in this privacy statement, and our processing of your sensitive personal information will be equipped with strict security measures and be conducted in a manner having the least impact on your personal rights and interests.

我们向您收集的某些信息(例如您的身份文件)可能包含或可能被视为"敏感个人信息"。我们会确保,仅在为实现本隐私声明中所述的特定目的所需的必要范围内处理您的敏感个人信息,并且,我们对您的敏感个人信息进行处理时将采取严格的安全措施,并以对您个人权益影响最小的方式进行。

#### 5. Cookies

#### **Cookies**

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser.

Cookie 是网络服务器发送给网络浏览器的一小段信息,它使服务器能够从浏览器收集信息。

The Site may use cookies in order to improve the visitor experience by enabling the Site to 'remember' you, either for the duration of your visit (using a "session cookie") or for repeat visits (using a "persistent cookie"). Cookies, if used, are set by the Site ("first party cookies"). At present, the Site does not have cookies set by other websites who run content on the page you are viewing ("third party cookies").

网站可能会使用 cookie(在您访问期间使用"会话 cookie"或在您重复访问时使用"持久 cookie"),以便网站能够"记住"您,从而提升您的访问体验。cookie(若使用)是由网站设置的(简称"第一方 cookie")。当前,网站没有由在您浏览的页面上运行内容的其他网站设置的 cookie(简称"第三方 cookie")。

We may use "personalisation" cookies to identify you when you visit the Site and to keep track of your browsing patterns and build up a demographic profile. We may use "analytics" cookies to understand who has seen which of the pages on the Site and to determine the most popular areas of the Site so that we can improve and develop the Site.

我们可能会使用"个性化"cookie,在您访问网站时识别您的身份,记录您的浏览模式并建立人口统计资料。我们还可能会使用"分析"cookie,以便了解谁在网站上浏览了哪些页面并确定网站最受欢迎的版块,从而帮助我们对网站进行改进和开发。

The duration of time that a cookie remains on your PC or device depends on if it is a 'persistent' cookie or a 'session' cookie. Session cookies last up until you stop browsing; persistent cookies last until they expire or are deleted. If cookies are used, most of them will be session cookies and will expire when your browsing session is finished. You may be able to remove persistent cookies at any time through your browser settings.

cookie 在您的个人电脑或设备上保留的时间,取决于它是"持久"cookie 还是"会话"cookie。会话 cookie 会持续到您停止浏览之时;持久 cookie 会持续到它们过期或被删除之时。在使用了 cookie 的情况下,大部分 cookie 都将是会话 cookie 并且会在您的浏览会话结束时过期。您随时可以通过您的浏览器设置来删除持久 cookie。

For further information about cookies used on Trinity's websites, please contact us using the details set out in paragraph 14 below.

若需了解更多关于 Trinity 网站上使用的 cookie 的信息,请通过下文第 14 条所载的详情与我们联系。

## 6. Children's Privacy

#### 儿童隐私

The Site is not intended for use by individuals under 14 years of age and so, if you are under 14, you must not use the service on our Site or provide any personal information to us without the express consent of your parent or quardian.

网站不适合未满 14 周岁的人士使用,因此,如果您未满 14 周岁,未经您的父母或监护人明确同意,您不得使用我们网站上的任何服务,也不得向我们提供任何个人信息。

If you are under 14 years of age, we may need to verify your parent or legal guardian's consent for your use of the services on the Site.

如果您未满 **14** 周岁,我们可能需要核实您的父母或法定监护人对您使用网站上所提供服务的同意。

## 7. How do we use your personal information?

## 我们如何使用您的个人信息?

We may use your personal information for one or more of the following purposes (depending on the nature of our relationship, and whether you are just visiting our Site, interacting with us online or submitting an online application form for potential registered centers to us):

我们可能会将您的个人信息用于以下一个或多个目的(具体取决于我们之间关系的性质,并取决于您只是访问我们的网站还是与我们在线互动或向我们提交关于潜在注册中心的在线申请表单):

- providing, improving and personalizing our services and our Site;
   提供、改善和个性化我们的服务和我们的网站;
- providing you with information and news about our exams, products and programs of events, such as our syllabuses, publications, webinars or

conferences, if you have requested to receive our newsletters or if you are our existing or former customer;

为您提供有关我们的考试、产品和活动计划的信息和新闻,例如我们的教学大纲、出版物、网络研讨会或会议(前提是您已经要求我们向您发送我们的简讯或您是我们的现有客户或前客户);

• considering and processing your application for becoming a registered center and communicating with you in connection with your application;

考虑并处理您的注册中心申请,并就您的申请与您沟通;

providing booking services when you register for our events;

当您注册参加我们的活动时为您提供预订服务:

dealing with your enquiries, requests, complaints and appeals;

处理您的查询、要求、投诉和申诉;

retaining a record of incoming and outgoing communications (e.g., e-mails, telephone calls) - information in the e-mail we receive and send will not be disclosed to any third party without the permission of the sender unless otherwise permitted in accordance with the applicable data protection laws;

保留传入和传出通讯(例如电子邮件、电话)的记录 - 未经发件人允许,我们接收和发送的电子邮件中的信息不会披露给任何第三方,除非适用的信息保护法律另行允许;

 providing you access to downloadable support resources (if available on the Site);

为您提供(网站上可用的)可下载支持资源的访问权限;

• inviting you to participate in marketing and academic surveys, if you have specifically consented to receive such communications or if you are our existing or former customer;

邀请您参与市场营销和学术调查(前提是您已经明确同意接收该等通讯或您是我们的现有客户或前客户);

administering registered user records;

管理注册用户记录;

• using aggregated data for academic, research, standardization and training purposes to improve and develop our products and services;

为学术、研究、标准化和培训目的使用汇总数据,以改善和开发我们的产品及服务;

• generating anonymous reports about the use of our Site and our services; 生成关于我们的网站和我们的服务的使用情况的匿名报告:

monitoring malpractice and preventing fraud or misuse of service;

• in response to requests by government or law enforcement authorities conducting an investigation;

响应政府或执法机构进行调查的要求;

监控不当行为及防止欺诈或滥用服务:

to satisfy legal obligations which are binding on us;

履行对我们有约束力的法律义务:

• in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such personal information in connection with legal process or litigation);

在必要时使用与法律索赔、合规、监管和调查目的有关的个人信息(包括在 法律程序或诉讼中披露该等个人信息):

for the prevention of fraud or misuse of service; and/or

防止欺诈或滥用服务;及/或

 for the establishment, defence or enforcement of legal claims (including disclosure of such personal information as is required in connection with legal process or litigation).

用于确立、抗辩或执行法律索赔(包括根据法律程序或诉讼所需披露该等个 人信息)。

# 8. Marketing communications and your rights

营销通讯和您的权利

Except in relation to individuals who have already signed-up for an exam, event or other service or good from us, Trinity operates a strict 'opt-in' policy for individuals. That means that where you have already signed-up for an exam, event or other good or service from Trinity, we may send you news and information of similar exams, events, goods or services that we provide until we are informed that this communication is no longer required. We will give you an opportunity to 'opt-out' of receiving such communications at the time that we collect your personal information and every time after that when we contact you with such communications. In all other cases, we will not send you any information unless you have requested to receive email/text/social media message updates from us. We may require the consent of a parent or guardian where a child under the age of 14 years wishes to 'opt-in' to receive such updates from us.

除与已注册我们的考试、活动或其他服务或商品的个人相关的情况外,Trinity 对个人实行严格的"选择加入"政策。这意味着如果您已经注册 Trinity 的考试、活动或其他商品或服务,我们可能会向您发送我们提供的类似考试、活动、商品或服务的新闻和信息,直到您告知我们不再希望接收该等通讯。在我们收集您的个人信息时,以及之后每次通过该等通讯与您联系时,我们将为您提供"选择退出"接收该等通讯的机会。在所有其他情况下,我们不会向您发送任何信息,除非您要求接收我们的电子邮件/文本/社交媒体消息更新。如果未满 14 周岁的未成年人希望"选择加入"以接收我们的更新讯息,我们可能需要父母或监护人的同意。

For legal entities, such as companies, limited liability partnerships and other incorporated organizations, Trinity operates, in compliance with the relevant data protection laws, an 'opt-out' policy. This means that we will continue to contact such businesses with news and information of our goods and services until we are informed that this communication is no longer required.

对于法律实体,例如公司、有限责任合伙企业及其他法团组织,Trinity 会遵照相关信息保护法律,实行"选择退出"政策。这意味着,我们将继续与这些企业联系,提供我们的商品和服务的新闻和信息,直至我们被告知不再需要该等通讯。

You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by clicking on the unsubscribe link in the relevant email or message or by emailing us at <a href="mailto:unsubscribe@trinitycollege.com">unsubscribe@trinitycollege.com</a>. Once this information is received we will remove you from our direct marketing database.

您享有绝对权利随时选择退出直接营销或我们为直接营销进行的画像分析。您可以通过点击相关电子邮件或消息中的退订链接,或发送电子邮件至 <u>unsubscribe@trinitycollege.com</u>退出。一旦收到此信息,我们会从直接营销数据库中将您删除。

## 9. Lawful processing

#### 合法处理

We are required to rely on a lawful ground to collect and use the personal information that we have outlined above. The following are applicable, depending on the context:

我们必须依据合法理由收集和使用我们在上文概述的个人信息。以下理由视上下文适用:

- **Consent** Where you have provided your consent for our use of your personal information in a certain way. When we ask you for consent we will explain at that time the purpose for which we will use your personal information. For example, where we ask for your consent to send you our newsletter or information about our products, publications and programmes of events, or where we invite you to participate in marketing and academic surveys. Where applicable, we may require the consent of your parent or guardian.
- **同意** 您已同意我们以某种方式使用您的个人信息。当我们征求您的同意时,我们会解释使用您个人信息的目的。例如,我们征求您同意向您发送有关我们产品、出版物和活动计划的简讯或信息,或我们邀请您参加营销和学术调查时。在适用时,我们可能需要您的父母或监护人同意。
- **Legal obligation** Where the processing of your personal information is necessary for us to comply with a legal obligation to which we are subject. For example, where we respond to requests by government, regulatory or law enforcement authorities conducting an investigation.
- **法律义务** 为遵守我们必须遵守的法律义务,我们需要处理您的个人信息。 例如,为了响应政府、监管或执法机构进行调查的要求。
- **Contractual relationship** Where it is necessary for us to process your personal information in order to perform a contract to which you are a party or to take steps at your request prior to entering a contract. For example, to provide you with support resources (where available).
- **合同关系** 我们需要处理您的个人信息,以履行您作为一方的合同,或在签订合同之前根据您的要求采取行动。例如,为您提供支持资源(如有)。
- In addition to the above, we may also process your personal information on the basis of other lawful grounds for processing of personal

information as stipulated under the PIPL and other applicable data protection laws.

除上述理由外,我们还可以依据《个人信息保护法》以及其他适用的信息保护法律中规定的其他合法理由来处理您的个人信息。

## 10. Sharing your Personal information

## 共享您的个人信息

We will only share personal information we collect from you with:

我们将仅与以下对象共享我们向您收集的个人信息:

 other companies in our group, including our affiliate in Hong Kong and Trinity College London located outside China and Hong Kong, where they are providing support services to us ("Trinity Affiliates");

我们集团旗下为我们提供支持服务的其他公司,包括我们在香港的关联公司以及位于中国和香港境外的伦敦圣三一学院(简称"Trinity关联方");

 our centres, exam service providers and local representatives who deliver information and services in relation to our exams in your locality;

我们的中心、考试服务提供商和在您所在地提供我们的考试相关信息和服务 的当地代表;

the schools, colleges, education centres, local authorities and any other
entity that provides training courses preparing for a qualification
awarded by us, to the extent necessary to provide them with information
about your results;

针对我们授予的认证提供培训课程的学校、学院、教育中心、地方主管机构和任何其他实体(在向他们提供有关您的结果的信息所需的范围内):

 those persons or bodies contracted by us to carry out the roles of examiner, marker, advisor, moderator, proctor, tutor, consultant, steward, representative or other similar roles on our behalf in the context of our provision of qualifications and/or in the course of providing training to such persons or bodies;

与我们签订合同,在我们提供认证的情况下代表我们担任考官、阅卷人、顾问、监督员、监考员、导师、咨询顾问、管理员、代表或其他类似角色的人员或机构,及/或在向该等人员或机构提供培训的过程中共享;

 other exam candidates in the context of relevant exams, such as exam candidates participating with you in the discussion component of an ESOL Skills for Life exam;

相关考试的其他考生,比如与您一起参加 ESOL 生活技能考试讨论部分的考生;

 our academic research partners, for monitoring assessment and the development of assessment tools and products;

我们的学术研究合作伙伴,以便对评估工具和产品的评估和开发进行监测;

your parents and/or guardians (of children under 18 years of age), where
parents and/or guardians raise a specific request in relation to, or ask to
view, your personal information or where we need to obtain consent from
your parents and/or guardians (for children who are under 14 years of age
in China) or where we have any concerns; and/or

您(如果未满 18 周岁)的父母和/或监护人(如果父母和/或者监护人提出与您的个人信息相关的特定要求或要求查看您的个人信息,或我们需要获得您的父母和/或监护人同意(在中国适用于未满 14 周岁的未成年人)或我们有任何顾虑);及/或

• as required by law to any law enforcement, regulatory or other government bodies or agencies.

根据法律要求与任何执法、监管或其他政府部门或机构共享。

In addition, Trinity Affiliates that receive personal information from us may disclose the personal information to selected third party processors (such as agents and suppliers) but only in connection with Trinity's own processing purposes, as outlined above in paragraph 7. Any such third party will be required to use any personal information they receive from Trinity Affiliates in accordance with Trinity Affiliates' instructions and the applicable data protection laws.

另外,从我们处接收个人信息的 Trinity 关联方可能会将这些个人信息披露给选定的第三方处理者(比如代理商和供应商),但仅限于上文第 7 条所述的 Trinity 自己的处理目的。任何该等第三方均需根据 Trinity 关联方的指示和适用的信息保护法律使用他们从 Trinity 关联方收到的任何个人信息。

We reserve the right to disclose your personal information to third parties:

我们保留在下述情况下向第三方披露您个人信息的权利:

• in the event that we buy or sell any business or assets, in which case we will disclose your personal information to the prospective buyer or seller of such business or assets;

如果我们购买或出售任何业务或资产,在此情况下,我们将向该等业务或资产的潜在买方或卖方披露您的个人信息;

• if substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;

如果我们的绝大部分资产被第三方收购,我们持有的个人信息可能构成被转 让资产的一部分;

 for auditing purposes, e.g., finance audits where we employ chartered accountants;

出于审计目的,例如在我们聘请特许会计师开展财务审计的情况下;

- if we are under any legal or regulatory obligation to do so; and
   如果我们有任何法律或监管义务这么做;及
- in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

与任何法律诉讼或预期的法律诉讼有关,以便确立、行使或捍卫我们的法律权利。

## 11. International data transfers

#### 跨国数据传输

Personal information we collect from you may be transferred to and stored in a location outside of China, as we need other companies in our group to provide support services to us. These other companies in our group may further transfer your personal information to third parties located outside of China for processing as described in paragraph 10 above.

鉴于我们需要集团旗下其他公司为我们提供支持服务,我们向您收集的个人信息可能会被传输到并存储在中国境外的地点。我们集团旗下的这些其他公司可能会进一步将您的个人信息传输给位于中国境外的第三方供其开展上文第 10 条所述的处理活动。

Where your personal information is transferred, stored, and/or otherwise processed outside of China, we will put in place appropriate transfer

mechanisms as required under the relevant China data protection laws and any other applicable data protection laws and take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information. If you have any questions about the transfer of your personal information, please contact us.

如果您的个人信息被传输到中国境外或在中国境外存储和/或在中国境外处理,我们将按照相关的中国信息保护法律以及任何其他适用的信息保护法律的要求落实适当的传输机制,并采取一切必要的合理措施,确保接收方实施适当的保护措施保护您的个人信息。如果您对您个人信息的传输有任何疑问,请联系我们。

## 12. Security of Data

## 信息安全

Trinity takes seriously its security obligations in respect of your personal information under the data protection laws. We will endeavor to take all reasonable steps to protect your personal information in order to prevent unauthorized access to, or alteration or destruction of personal information in our possession. All the personal information we collect is stored securely on servers and we use secure internet protocols and secure networks to protect data collection and processing.

Trinity 非常重视信息保护法律项下关于您的个人信息的安全义务。我们将尽力采取一切合理措施保护您的个人信息,以防止未经授权而访问、篡改或销毁我们持有的个人信息。我们收集的所有个人信息都安全地存储在服务器上,我们使用安全的互联网协议和安全的网络对信息的收集和处理加以保护。

While we will use all reasonable efforts to safeguard your personal information, you acknowledge that the use of the internet is not entirely secure and for this reason, we cannot guarantee the security or integrity of any personal information that is transferred via the internet. If you have any particular concerns about your information, please contact us (see paragraph 14 below for our contact details).

我们会尽一切合理努力保护您的个人信息,但是,您也承认,互联网的使用不是百分百安全的,因此,我们无法保证通过互联网传输的任何个人信息的安全性或完整性。如果您对您的信息有任何特别的顾虑,请联系我们(我们的联系方式参见下文第 14 条)。

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. 我们已制定程序来处理任何可疑的数据泄露,并将在法律要求的情况下,向您和任何适用的监管机构告知可疑的数据泄露。

# 13. How long do we keep your personal information for?

## 我们会保存您的个人信息多久?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. If you would like to understand further details about the periods for which we retain personal information and the criteria determined for setting these periods, please contact us (see paragraph 15 below for our contact details).

我们将只在为实现我们收集信息的目的(包括为了满足任何法律、会计或报告要求)而必要的期限内保留您的个人信息。在确定您个人信息的适当保留期时,我们会考虑个人信息的数量、性质和敏感性,未经授权而使用或披露您个人信息的潜在危害风险,我们处理您个人信息的目的,我们是否可以通过其他方式实现这些目的,以及适用的法律要求。如需了解关于个人信息保留期以及设定保留期时采用的标准的更多详情,请联系我们(我们的联系方式参见下文第15条)。

# 14. Your rights

# 您的权利

Where we rely on your consent to use your personal information, you have the right to withdraw your consent at any time.

如果我们需要您同意才能使用您的个人信息,您有权随时撤回同意。

Under certain circumstances, by law, you have the right to:

在某些情况下,依据法律您有权:

a. **Request access** to your personal information. This enables you to receive a confirmation from us as to whether we process any of

your personal information or not, and if this is the case, to receive a copy of such personal information and to check that we are lawfully processing it.

**请求查阅**您的个人信息。通过行使该权利,您可以收到关于我们是否 处理您的任何个人信息的确认,并在我们处理您的个人信息的情况 下,收到该等个人信息的副本并检查我们的处理是否合法。

b. **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**请求更正**我们持有的有关您的个人信息。通过行使该权利,您可以更 正我们持有的关于您的任何不完整或不准确的信息。

c. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no appropriate reason for us continuing to process it or under other circumstances specified under China data protection laws. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**请求删除**您的个人信息。通过行使该权利,您可以要求我们在没有适当理由继续处理个人信息的情况下或在中国信息保护法律规定的其他情况下删除或移除个人信息。您也有权要求我们在您已行使反对处理权(见下文)的情况下删除或移除您的个人信息。

d. **Object to the processing** of your personal information, for example you have the right to object if we are processing your personal information for direct marketing purposes.

**反对处理**您的个人信息,例如,如果我们出于直接营销目的处理您的 个人信息,您有权反对。

e. **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.

**请求限制处理**您的个人信息。通过行使该权利,您可以要求我们暂停处理您的个人信息,例如,如果您希望我们确定其准确性或处理原因。

f. Request a machine-readable copy of or the transfer to another party of your personal information, where technically feasible and to the extent the conditions required by laws or supervisory authorities are fulfilled.

**索要**您的个人信息的**一份机器可读副本或请求**将您的个人信息**转移**至 另一方,前提是技术上可行并且满足法律或监管机构要求的条件。

g. **Request the explanation of our rules of processing** of your personal information.

请求解释说明我们处理您的个人信息的规则。

Parents and/or guardians may be able to exercise some of these rights on behalf of their child (who is under the age of 18 years) in connection with their child's personal information, though, depending on the circumstances, we may need to keep the child informed of such exercise of their rights by a parent and/or guardian.

父母和/或监护人可能可以代表其(未满 18 周岁的)子女就子女的个人信息行使其中一些权利,但根据情况,我们可能需要让子女了解父母和/或监护人行使其权利的情况。

Your rights described above may be limited in some instances where statutory exemptions apply, such as where they would infringe the rights of a third party or our rights or if you ask us to delete information which we are required by law to keep. We will inform you of the relevant exemptions we rely upon when responding to any request you make. Where we send you emails, if you decide you do not wish to receive any further emails from us, please tell us and we will remove you from the mailing list. At any point you can request to unsubscribe from our mailing by contacting us using the details listed at paragraph 15.

在适用法定豁免的某些情况下,您的上述权利可能会受到限制,比如,如果这些权利会侵犯第三方的权利或我们的权利,或者如果您要求我们删除法律要求我们保留的信息。我们将在回应您的任何请求时向您告知我们依赖的相关豁免情形。在我们向您发送电子邮件的情况下,如果您决定您不希望再接收我们的任何电子邮件,请告知我们,我们会从邮寄列表中将您删除。您任何时候均可通过第 15 条列出的联系方式与我们联系要求退出我们的邮寄列表。

• If you would like to exercise any of the above rights, please:

如果您想要行使您的以上任何权利,请:

contact us (see paragraph 15 below);

联系我们(参见下文第15条);

 let us have proof of your identity. This is to allow us to verify your identity and prevent disclosure to unauthorized third parties; and

向我们提供关于您身份的证据,这样我们就可以核实您的身份并防止向未经 授权第三方披露相关信息;及

let us know the details of your request, for example by specifying the
personal information you want to access, the information that is incorrect
and the information with which it should be replaced.

告知我们您的请求的详情,例如,具体说明您想要查阅哪些个人信息、哪些个人信息不准确以及哪些个人信息应当替换。

If you have unresolved concerns, you have the right to complain to the competent data protection authority.

如果您有未解决的问题,您有权向主管的信息保护机构投诉。

#### 15. Contact us

#### 联系我们

If you have any questions about this privacy statement or how we handle your personal information, or if you wish to make a complaint, please contact us at <a href="mailto:dpochina@trinitycollege.com">dpochina@trinitycollege.com</a>.

如果您对本隐私声明或我们如何处理您的个人信息有任何疑问,或者希望提出投诉,请通过 <u>dpochina@trinitycollege.com</u>联系我们。

## 16. Changes to this privacy statement

## 本隐私声明的变更

From time to time we may update this privacy statement. When we do, we will publish the updated version on the Site. If material changes are made to this privacy statement we will notify you by email or by placing a prominent notice on the Site.

我们可能会不时更新本隐私声明。届时,我们将在网站上发布更新版本。如果本隐私声明发生重大变更,我们将通过电子邮件或在网站的显眼位置发布告知通知您。

Trinity trusts that you appreciate that we respect and value your right to privacy, and that our honesty and integrity shall mean that you will continue to trust us with your personal information, knowing that we will not use it for any inappropriate purpose.

Trinity 相信,您理解我们对于您隐私权的尊重和重视,并且,我们的诚信和廉正意味着,您知道我们不会将您的个人信息用于任何不恰当的目的,所以您会继续放心地将您的个人信息交给我们。

☐ I have read the privacy statement. I understand the contents and expressly and voluntarily consent to the privacy statement and the processing of my personal information in accordance with the privacy statement; and

我已阅读隐私声明。我理解隐私声明的内容,并且我明确、自愿地对隐私声明 以及按照隐私声明处理我的个人信息表示同意;及

□ I expressly, specifically, and voluntarily consent to the processing of sensitive personal information, sharing of personal information with and the cross-border transfer of personal information to Trinity's Affiliates and third parties located outside China, for the purposes and in the manner described in the privacy statement.

我明确、特别、自愿地同意:为隐私声明中所述的目的并以隐私声明中所述的方式,处理我的敏感个人信息、与位于中国境外的 Trinity 关联方和第三方共享我的个人信息以及向位于中国境外的 Trinity 关联方和第三方跨境传输我的个人信息。