

# China NAO Privacy Policy

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**The Duke of Edinburgh's International Award China**

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## Issue control

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## 1. Introduction

1.1 The following privacy policy sets out how Beijing Intaward International Culture Development Co., Ltd, with the registered address at No. 37 Maizidian Road, Room 2126 at Floor 21, which is also known as The Duke of Edinburgh's International Award China ("China NAO"), handles personal information of the Award participants, employees, operators, volunteers and supporters (individually as "Individual" or collectively as "Individuals"). China NAO will be the controller of such Person Information.

1.2 Any organisation or person licensed to administer, manage or coordinate the Award in mainland China (including without limitation Registered Operators, assessors, volunteers or Award Leaders, collectively "Licensees") must comply with this policy. Where applicable, the data protection obligations of China NAO as set out in this privacy policy shall apply to the Licensees.

## 2. Collection of Personal Information

2.1 Personal information collected by China NAO includes the Individual's name, gender, nationality, address, telephone number, email address, date of birth, school name or organization name, employment status, and Award information, such as the registration data and Award log entries, and the name, telephone number, and email address of the individual's parent or guardian (if applicable) ("Personal Information"). Personal Information is only collected lawfully and fairly, and not in an unreasonably intrusive way.

2.2 The Personal Information collected in clause 2.1 is used for award delivery, i.e., to manage, administer, record and support participation in the Award. Such information is also collected to keep employees, volunteers, supporters, and participants informed about Award activities and events.

2.3 China NAO generally collects Personal Information directly from the Individual or their authorised intermediaries. China NAO will take reasonable steps to ensure that when information is collected from a third party the subject of the information has given express consent to this action.

2.4 In certain circumstances, China NAO may collect sensitive information about Individuals. For example, an Individual may provide information on their health or racial origin in the online record book. China NAO only collects, uses and discloses sensitive information with a person's consent or otherwise in accordance with law.

2.5 When an Individual's Personal Information is available from other public sources: We may collect personal details about the Individual from the public domain, such as from social networks, company websites, political and property registers, and news archives. We may engage data

services agencies to collect this information. Such information, once gathered, will be subject to this privacy policy.

### **3. Use and disclosure of Personal Information**

3.1 China NAO generally limits its use and disclosure of Personal Information to the purpose for which it was collected and it will not be used for any other purposes that are not specified in this privacy policy without additional notified consent of the Individual.

3.2 If China NAO wishes to use or disclose Personal Information in other circumstances, it will obtain the Individual's consent to do so.

3.3 China NAO will not share Personal Information with any other entity, except under the following circumstances:

3.3.1 Sharing Personal Information with the relevant Individual's express consent;

3.3.2 Sharing Personal Information as required by applicable laws and regulations, or pursuant to the requests of any regulatory agencies;

3.3.3 Sharing Personal Information with the Duke of Edinburgh's International Award Foundation and other entities that are affiliated with China NAO ("Affiliates"), provided that China NAO will only share Personal Information that is strictly necessary and the Affiliates will only process the shared Personal Information in strict compliance with this privacy policy. If the Affiliates wish to process the shared Personal Information for any additional purposes that are not specified in this privacy policy, the Affiliates will obtain the relevant Individual's prior notified consent.

3.3.4 Sharing Personal Information with third party vendors and other collaborating entities ("Vendors") to facilitate the purposes specified in this privacy policy, provided that China NAO will only share Personal Information that is strictly necessary to achieve such purposes and such Vendors will only process the shared Personal Information in strict compliance with this privacy policy. China NAO will supervise such Vendors through contractual arrangement and audits against such Vendors.

3.4 Personal Information may also be used to inform operators, volunteers, supporters and participants of Award programme news, activities and events. Individuals who no longer wish to receive such promotional information may advise China NAO using the contact details below.

### **4. Data quality**

4.1 China NAO will take reasonable steps to ensure that Personal Information it collects, uses or discloses is accurate, complete and up-to-date.

## 5. Security of Personal Information

5.1 Personal Information will be stored in the European Economic Area and for the shortest time to achieve the purposes as set out in this privacy policy, unless otherwise required by the applicable laws and regulations

5.2 China NAO will take reasonable steps to ensure there are appropriate technical controls to protect the Personal Information it holds from misuse and loss and from unauthorised access, modification or disclosure.

5.3 China NAO will take reasonable steps to destroy or permanently de-identify Personal Information collected which is no longer required.

5.4 China NAO undertakes regular reviews of who has access to information that we hold to ensure that Personal Information is only accessible by appropriately trained staff, contractors or volunteers.

## 6. Individual's Rights

6.1 Unless otherwise required by applicable laws and regulations, the Individual of the relevant Personal Information is entitled to access, modify, delete, obtain a copy of his/her personal information, withdraw the consent to process his/her Personal Information, and deregister his/her account (subject to clause 6.2).

6.2 The Individual is entitled to request China NAO to delete his/her Personal Information under any of the following circumstances: i) where China NAO processes his/her Personal Information in violation of applicable laws and regulations; ii) where China NAO processes his/her Personal Information without obtaining valid consent from the Individual; iii) where China NAO processes Personal Information in violation of the agreement with the Individual; or iv) where the Individual is no longer participating in the award delivery process, or China NAO ceases to provide services to the Individual.

6.3 To exercise these rights, the Individual shall submit a written request to [ceo@intawardchina.cn](mailto:ceo@intawardchina.cn) or to 2126, No.37, Maizidian Street, Chaoyang District, Beijing, clearly indicating the request for deletion and the reason(s) of such deletion. In order to ensure security of Personal Information, China NAO will take steps to verify the identity of the requesting Individual before processing the deletion. China NAO will respond to such request within thirty (30) working days.

6.4 China NAO generally will not charge fees to Individual's reasonable requests to exercise the rights set out in clause 6.1. However, China NAO may charge reasonable costs for requests that are repeating or exceeding reasonable scope. In addition, China NAO may decline the requests that are unreasonable in China NAO's sole discretion, or if processing such request may jeopardize the

legitimate rights and interests of the others.

6.5 Pursuant to applicable laws and regulations, China NAO will not be able to respond the Individual's request under the following circumstances:

- 6.5.1 If the request is directly related to the state's security or defense security;
- 6.5.2 If the request is directly related to public security or important public interest;
- 6.5.3 If the request is directly related to the investigation, prosecution, judgment, or the execution of a judgment;
- 6.5.4 If there is abundant evidence showing the requesting Individual's bad intention or abuse of rights;
- 6.5.5 If responding the request will cause serious damages to the legitimate rights and interest of the requesting Individual, any other persons or organizations;
- 6.5.6 If trade secret is involved.

## **7. Cross-border data transfer**

7.1 China NAO operates with worldwide resources and servers, which means, the Personal Information may be transferred to, or be accessed in oversea jurisdictions other than the jurisdiction where Personal Information was collected. China NAO will comply with applicable laws and regulations regarding the cross-border transfer, including but not limited to, conducting security assessment of the cross-border data transfer, implementing proper agreement with data receiver.

7.2 Such oversea jurisdictions may adopt different data protection laws. Under this circumstance, China NAO will ensure the transferred Personal Information obtains the same level of protection in such jurisdiction as within the PRC. For example, China NAO will obtain the Individual's consent for the cross-border transfer of his/her Personal Information, or de-identify the Personal Information before the cross-border transfer occurs.

## **8. Online privacy policy**

8.1 China NAO recognizes and appreciates the importance of responsible handling of Personal Information collected through electronic means. This section outlines the way China NAO handles Personal Information collected when an individual uses China NAO website under the domain name <https://www.onlinerecordbook.org>.

### **8.1.1 Collection of Personal Information**

8.1.1.1 An individual may visit the website without providing any Personal Information. If an individual emails China NAO through the website, the email may contain Personal Information about that individual (such as their name, mailing address or email address, etc). Except as specifically provided below, China NAO will treat Personal Information collected on the website in accordance with the general Personal Information management practices as set out in this privacy

policy.

#### 8.1.2 Disclosure of Personal Information

8.1.2.1 China NAO outsources the development, maintenance and hosting of the website to third party service providers. China NAO may disclose Personal Information collected on the website to its third party service providers so that they can effectively provide these services.

#### 8.1.3 Links

8.1.3.1 China NAO may, from time to time, include links on the website to the websites of other organisations. China NAO is not responsible for the privacy practices of these websites.

#### 8.1.4 Website security

8.1.4.1 As with any internet transaction, the transmission of data over the internet is not completely secure. China NAO will take reasonable steps to protect all the Personal Information in its possession that it has collected via the website in accordance with its general Personal Information management practices. In case the Personal Information submitted over the internet is accessed, modified, or damaged without authorization by circumventing China NAO's security protection measure, and as a result, the Individual's rights and interests are compromised, China NAO will take responsibilities to the extent as required under applicable laws and regulations.

8.1.4.2 When the Individual visits our website we may gather information, such as which pages the Individual visits or how long the Individual spends reading a particular page. This data helps us to improve visitors' online experience, for example by adding new features, or removing elements that make the website difficult to use. We may also use data and insights to help inform the choice of words and images that appear on the site, in order to improve visitors' response to our campaigns.

#### 8.1.5 Social media

8.1.5.1 Depending on the Individual's settings or the privacy policies for social media and messaging services like WeChat, the Individual might give us permission to access information from those accounts or services.

### **9. Children's Personal Information**

9.1 China NAO will protect Personal Information of children who are under 14 years old ("Children's Personal Information") in compliance with applicable laws and regulations, and will appoint designated personnel to be in charge of protection of Children's Personal Information.

9.2 Children's Personal Information shall be stored with encryption. Access to Children's Personal Information will be strictly limited to a need-to-know basis. Access to Children's Personal Information shall be approved by the personnel in charge of Children's Personal Information, and such access shall be duly recorded. In addition, technical measures will be implemented to prevent

unauthorized downloading of Children's Personal Information.

9.3 Transfer of Children's Personal Information shall be subject to security assessment conducted by China NAO or a designated third party.

9.4 China NAO will not disclose Children's Personal Information unless required by applicable laws and regulations or agreed with the relevant children's guardians.

9.5 China NAO will implement the emergency plan when it is discovered that Children's Personal Information has been or may be disclosed without authorization, damaged or lost. In case of a severe damage or a possible severe damage, China NAO will immediately report to the regulating authority, and notify the affected children and their guardians via email, letters, phone calls, website notifications, or other notifications if applicable.

9.6 In case China NAO ceases operation, we will immediately cease collection of Children's Personal Information, delete the Children's Personal Information we possess, and notify the children's guardians of such cessation in a timely manner.

9.7 A security assessment should be conducted in case China NAO entrusts any Licensees to process Children's Personal Information in order to administer, manage or coordinate the Award in mainland China.

9.8 The Licensees shall i) process the Children's Personal Information in accordance with applicable laws and regulations; ii) assist China NAO to respond to requests brought by the children's guardians; iii) implement technical and organizational security measures and report to China NAO of any breach of Children's Personal Information in a timely manner; iv) delete the Children's Personal Information in a timely manner upon the cessation of the license between the Licensee and China NAO; v) not transfer such obligation to any third party; and vi) perform any other obligations as China NAO deems necessary and proper to protect Children's Personal Information.

## **10. Update of the privacy policy**

10.1 This privacy policy may be modified and updated from time to time. Without the Individual's notified consent, China NAO will not reduce any rights of the Individual as set out in this privacy policy. Any updates about this privacy policy will be published at the same webpage.

10.2 Under certain circumstances and subject to China NAO's sole discretion, China NAO will but is not obliged to provide notification about material updates of this privacy policy to the Individuals, such as by sending emails to explain the updated contents.

## **11. Complaints**

11.1 Any Individual who believes that China NAO has not complied with this privacy policy with respect to the handling of their Personal Information should write to China NAO using the contact details below. The letter should describe in detail the nature of the enquiry or the ways in which



NO: NAOPP1



the Individual believes that this policy has not been complied with. Please also send proof of identity (passport, ID card or driving licence) and proof of address (for example a utility bill).

11.2 The Individual also has the right to lodge a complaint to the regulating authority, i.e., the Cyber Administration of China or its local counterpart (where applicable), with its official website at <http://www.cac.gov.cn/>, for resolution of any disputes.

## **12. Contact details**

12.1 Any Individual who has a question or complaint about how China NAO handles their Personal Information or who wishes to access or correct their Personal Information that China NAO holds about them should contact [ceo@intawardchina.cn](mailto:ceo@intawardchina.cn) or

The Duke of Edinburgh's International Award China  
Room 2126,  
NO 37, Maizidian Street,  
Chaoyang District, Beijing  
China