

China NAO Data Security and Personal Information Protection Policy

1. The Duke of Edinburgh's International Award China (hereinafter referred to as the "Award") is an international award granted by the Duke of Edinburgh's International Award Foundation (hereinafter referred to as the "Foundation"). Shanghai Enshaw Technology Group Co., Ltd. is the official agency of the Duke of Edinburgh's International Award in mainland China (excluding Hong Kong Special Administrative Region, Macau Special Administrative Region, and Taiwan, hereinafter the same) and has obtained an exclusive, transferable license for the relevant intellectual property rights from the Duke of Edinburgh's International Award Foundation to sublicense the relevant intellectual property rights to carry out its business. In this policy, Shanghai Enshaw Technology Group Co., Ltd., Beijing Intaward International Culture Development Co., Ltd., and their affiliated companies are collectively referred to as "China NAO".
2. China NAO requires all licensed award delivery partners in mainland China (hereinafter referred to as "award delivery partners," including but not limited to National Award Centers (NACs), Award Centers (ACs), Open Award Centers (OACs), and Recognized Activity Providers (RAPs) to comply with and implement this policy.
3. Definitions. Data refers to any recording of information by electronic or other means. Data processing includes the collection, storage, use, processing, transmission, provision, and disclosure of data, etc. Personal information refers to various information related to an identified or identifiable natural person recorded electronically or otherwise, excluding information that has been anonymized. Personal information processing includes the collection, storage, use, processing, transmission, provision, disclosure, and deletion, etc. of personal information.
4. Award delivery partners should ensure that the use and processing of data and personal information obtained from the Foundation (including all systems or platforms of the Foundation) and China NAO comply with Chinese laws and regulations and the requirements of this policy.
5. The personal information and other related data of Award participants are directly obtained and used by the award delivery partners from the Foundation. In this process, award delivery partners should comply with and implement the Foundation's "Privacy Policy" [original: <https://intaward.org/key-resources/policies/>; Chinese version: <https://www.intawardchina.cn/Policies/index.aspx>] and independently assume corresponding legal responsibilities. China NAO is not responsible for providing any such data to the award delivery partners and only assists in supervising and managing the above-mentioned actions of the award delivery partners based on the authorization of the Foundation (if any).
6. If an award delivery partner needs to provide any data and personal information it has obtained to China NAO to fulfill relevant agreements and cooperation, it should inform China NAO in advance of the type, scope, and compliance requirements of the data and personal information to be provided and obtain China NAO's consent. No data or personal information should be provided directly to China NAO without its consent.
7. Award delivery partners should process data and personal information in accordance with the principles of lawfulness, legitimacy, necessity and good faith, and directly bear legal responsibility to the Foundation and personal information subjects for their relevant data and personal information processing actions.
8. The processing of data and personal information by award delivery partners should only be for the purpose of

fulfilling relevant agreements between the parties and achieving the content of cooperation and should be directly related to the processing purpose, adopting in a way that minimizes the impact on personal rights and interests.

9. Award delivery partners should ensure the quality of data and personal information processed and avoid adverse effects caused by inaccurate or incomplete data or personal information.
10. Award delivery partners should independently assume responsibility for their personal information processing activities and take necessary measures to ensure the security of the data and personal information processed.
11. Award delivery partners should store the data and information obtained from the Foundation (including all systems or platforms of the Foundation) and China NAO within the territory of China, and the storage time should not exceed the time necessary for the processing purpose. If it is necessary to provide any data or personal information to overseas parties, the award delivery partner should obtain the consent of China NAO in advance and ensure compliance with relevant Chinese laws.
12. Award delivery partners should adopt reasonable technical or organizational measures to ensure the security of data and personal information.
13. If an award delivery partner needs to provide any data or personal information to a third party, it should notify China NAO in advance and take reasonable measures to ensure that the third party's protection of data and personal information is no less than the level required by this policy.
14. In the event of or potential for data or personal information leakage, tampering, or loss, award delivery partners should immediately take remedial measures, notify China NAO, and report immediately in accordance with legal requirements (if applicable).