

Schedule 1

附件一

Personal Data Protection Policy

个人信息保护政策

The School holds data and information about Parents, guardian and/or the Pupil including but not limited to contact details, financial information, exam results, biometric information and details of medical conditions ("**Information**"). This Information is kept electronically on the School's information management system or manually in indexed filing systems.

学校持有包括家长、监护人和/或学生的联系信息、财务信息、考试成绩、生物特征信息和医疗状况细节在内的数据和信息（“**信息**”）。以上信息由学校以电子信息形式记录在信息管理系统中或手写形式记录于文件索引系统中。

The School processes Information about Parents and the Pupil in order to safeguard and promote the Pupil's welfare, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with. Examples may include: the School keeping details of medical conditions from which the Pupil may suffer so that staff will be able to respond appropriately in the event of a medical emergency, and/or the School processing financial information obtained from the parents or from third parties such as credit reference agencies or the School using biometric information to allow pupils access in to School buildings or to record extras purchased.

学校处理家长和学生的相关信息是为了保护和提高学生的福利、提升学校的目标和利益、促进学校有效运营以及确保学校遵守相关法定义务。范例可包括：学校保存学生可能会出现医疗状况的细节以便职员在医疗紧急事故发生时，能做出适当的反应，和/或学校对来自家长或第三方如信用评级机构处获得的财务信息进行处理，或者学校使用生物识别信息准许学生进入校园范围或对额外购买进行记录。

This Personal Data Protection Policy ("**Policy**") will explain to You how the School collect and use Your and/or the Pupil information. Please ensure that You read and fully understand this Policy. If there are any doubts as to the content of this Policy, kindly inquire through the method set out under this Policy and the School will provide the necessary clarification. If You accept the offer letter or did not raise any query after the School updated the content of this Policy, You are deemed to have agreed to this Policy and agreed to the School collecting and using the Information in accordance with the terms of this Policy.

本《用户隐私政策》（“**本隐私政策**”）说明学校如何收集和使用您和学生的信息，请您认真阅读、充分理解本隐私政策。如果您对本隐私政策有疑问的，请通过本隐私政策约定的方式询问，学校将解释本隐私政策内容。您接受学校的录取同通知书或在学校更新本隐私政策后没有提出询问的，即意味着您已经同意本隐私政策，同意学校按照本隐私政策收集和使用您和/或学生的相关数据和信息。

1. Collection and Usage of Information

信息收集和使用

- (a) In order for the School to process the applications and manage the affairs of the Pupils, the School may need to process the Information for the purposes set out below:

为了使学校能够处理学生的入学申请和管理其相关事务，学校可能需要出于以下目的处理信息：

(i) Application for Admission Consultation

招生咨询申请

When submitting application for the School admission consultation sessions, You will need to provide the School with the name, gender, date of birth, nationality and enrollment year of the Pupil, Parents and/or guardian name, Parents and/or guardian-Pupil relationship, Parents and/or guardian mobile phone number, Parents and / or guardian email etc.

在提交申请参加学校招生咨询活动时，需要向学校提供学生姓名、学生性别、学生出生日期、学生国籍、学生入学年份、父母及/或监护人姓名、父母及/或监护人与学生的关系、父母及/或手机号码、父母及/或电子邮件等。

(ii) Submission of Application and Application Documents

入学申请和申请资料

When submitting application for admission, you will need to provide us with the name, gender, nationality, date of birth, passport information, Chinese visa information, enrollment year, education background, grades, awards and past school performance record of the Pupils; names, education background, date of birth and contact details of family members; name, date of birth, education background, contact details of the Pupil's referee, etc.

在提交入学申请时，需要向学校提供学生的姓名、性别、国籍、出生日期、护照信息、中国签证信息、入学年份、受教育背景、成绩、获奖情况和过往在校表现；家庭成员的姓名、受教育背景、生日、联系信息；学生推荐人的姓名、出生日期、受教育背景、联系信息等。

(iii) Fee Payment and Refund

费用支付与退还

The School may collect Your bank account information or third-party payment platform account information, transaction serial number, payment status and other

information from You in order for the School to collect the Pupil's application fee, tuition fee, school bus fees, extracurricular activities fees, pre-payment fees and other school-related fees from You and to make relevant refund to You.

学校可能会向您收集您的银行账号信息或第三方支付平台账号信息、交易流水号、支付状态等信息，用于学校向您收取学生的申请费、学费、校车费、校外活动费、预交费用等学校相关费用和向您退回相关款项。

(iv) Medical Information

医疗信息

The School will collect the Pupil's medical information in order to understand the health and medical condition of the Pupils for the purpose of managing the Pupil's affairs. This information will involve the privacy of the Pupil, such as the Pupil's name, nickname, gender, date of birth, home address, phone number and other personal data, name of family members and their contact details, blood type, eating habits and dietary restrictions; history of illness (including psychological and physical), injury history and treatment condition, matters to be noted by teachers and nurses, allergies, medication and medical information; sports restrictions; vision and vision correction condition, vaccination, insurance information such as issuer, insurance policy number, designated hospitals, etc.

为了解学生的身体健康状况和对学生的就学事务进行管理，学校将会向您收集学生的医疗健康信息，这些信息将涉及学生的隐私，例如学生姓名、昵称、性别、生日、家庭住址、电话等个人身份信息；家庭成员及其联系信息；血型；饮食习惯和禁忌；患病（含心理和生理）史、受伤史及治疗情况；教学及看护注意事项；过敏原；用药和医疗信息；运动禁忌；视力及视力矫正情况；接种疫苗情况；保险公司、保险单号码、定点医院等医疗保险信息等。

(v) Other Application Forms

其他申请表

You will need to provide Yours and/or the Pupil's name and home address, Parents'/ guardian's contact information, dietary requirements, photo to the School or third party service providers, if You or the Pupil requires other services from the School, such as boarding, school bus services, catering services, school uniforms, School access identification badge etc.

如您需要学校提供其他服务，如住宿、校车、餐饮、校服、校园卡等，您需要向学校或第三方供应商提交您和/或学生姓名、家庭住址、家长联系信息、饮食偏好、照片等。

(vi) Daily Communication and Contact

日常沟通和联系

The School will contact the You or the Pupil via the contact details provided by You in order to communicate with the You with regard to information/ development of the School and Pupils.

学校将通过您提交的联系信息，与您或学生就学校和学生的相关情况进行沟通和联系。

(vii) Miscellaneous

其他

Where, in the professional opinion of the Head it is deemed necessary the School may share information with certain third parties.

校长以专业意见认为学校有必要与特定第三方共享信息。

- (b) If the School enters into a separate arrangement for the payment of fees, it may, in order to verify Parents' identity and so that it can assess and application for credit, search the files of any licensed credit reference agency who will keep a record of that search and details about an application. This record will be seen by other organisations which make searches about the Parents. Failure to supply information may result in a refusal of credit.

如果学校对费用的支付做了另行安排，为了验证家长的身份以便评估和申请贷款，学校可能会搜索任何一家有资质的信用评级机构的文档，以获取申请人的记录和细节。该记录会被搜索家长信息的其他机构看到。无法提供此类信息可能导致家长无法获得贷款。

- (c) The School, other schools in the Harrow International group and/or its management companies ("School Group") may use the personal information submitted by Pupils/Parents to the School or photos, videos, audios and other materials of Parents/Pupils participating in learning programmes, daily life and activities inside and outside the School for the purpose of marketing. The School Group will use the personal data submitted by You to send You news briefings, latest news and promotional materials. The School Group may also publish photos, videos, audios and other materials containing You

or Pupils in various online and offline marketing channels, such as the School's or the School Group's internal and external medias, websites, exhibitions, prints, visual displays, etc. If You would like to withdraw Your consent in relation to such use, kindly contact the School via the manner set out in paragraph 8 of this Policy.

学校、哈罗国际集团内的其他学校和/或其管理公司（“学校集团”）可能会使用学生/家长向学校提交的个人信息，或家长/学生参与校内外学习、生活及活动的照片、视频、音频等素材，用于学校集团的市场宣传。学校集团将会使用您提交的个人信息，向您发送新闻简报、最新消息和宣传资料等信息。学校或学校集团也可能会在各线上线市场渠道，例如学校或学校集团内外媒体、网站、展会、印刷品、视觉陈列等发布包含您或学生的照片、视频、音频等素材。如果您想就上述使用撤回您的授权，请通过本政策第 8 段中规定的方式与学校联系。

2. **Storage of Information** **信息存储**

- (a) The information the School collect will be stored on servers located in the People's Republic of China (for the purpose of this Policy, excluding Hong Kong, Macau, and Taiwan) (“PRC”). At the same time, in order for the School to provide effective management and maintain the quality of education, the School may provide the data collected to headquarters of the School management company, Asia International School Limited (a company limited by shares incorporated under the Cayman Islands law with principal business address in Hong Kong), and store such data on the servers in the PRC and Hong Kong. If, due to business requirements, personal data needs to be transferred to foreign institution or individual, the School 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 law and regulation, provided such transfer is not prohibited by law.

学校收集的信息将保存在位于中华人民共和国境内（为本隐私政策之目的，不含香港、澳门、台湾地区）的服务器上。同时，出于为学校提供有效管理和维持教育质量的需要，学校或会将收集的信息提供给学校管理公司总部 Asia International School Limited（一家根据开曼群岛法律注册、主营业务地址在香港的有限公司），并将信息储存于中国境内和香港的服务器上。如在符合适用法律规定的情形下因业务需要向其他境外机构或个人传输个人信息的，学校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。

- (b) For the data collected, the retention period is the minimum time necessary to realize the operation functions of the School, and the

School will abide by the laws and relevant regulations strictly. 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, 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.

对于所收集的信息，学校的保存期限为实现学校运作所必需的最短时间，并严格遵守法律及相关法规规定。在保存期限届满、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，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。

3. Information Sharing, Transfer and Disclosure **信息共享、转移、公开披露**

(a) Information Sharing **信息共享**

The School will not share Information provided by You with any third parties without Your consent, except for the following:

未经您事先同意，学校不会与任何第三方共享您提供的信息，但以下情形除外：

(i) Share when obtained express consent: with Your prior consent, We will share Your Information with other parties;

在获取明确同意的情况下共享：经您事先明确同意，学校会与其他方共享您的信息；

(ii) Disclosing your Information to third party or administrative and judicial authorities in accordance with the relevant laws and regulations or the requirements of the administrative and judicial authorities.

根据相关法律法规的规定，或者行政、司法机关的要求，向第三方或者行政、司法机关披露您的信息。

(iii) Sharing with third-party suppliers: Some of the School's services will be provided by third-party suppliers where necessary. For example, school web design suppliers, school software design suppliers, marketing and public relations companies, catering suppliers and school uniform suppliers etc. The School will only share Your Information with third-party suppliers for specific and clear purposes based on legitimate,

proper and necessary principles, and the School will only share Information which is necessary to provide services. The School will request its suppliers to comply with this Policy and any other relevant confidentiality and security measures when processing Your Information.

与第三方供应商共享：为提供服务之需，学校的某些服务将由第三方供应商提供。例如，学校网页设计供应商、学校软件设计供应商、市场推广和公关公司、餐饮供应商和校服供应商等。学校仅会根据合法、正当、必要的原则，基于特定、明确的目的与第三方供应商共享您的用户信息，仅会共享提供服务所必要的用户信息，并要求供应商按照本隐私政策以及其他任何相关的保密和安全措施来处理您的信息。

- (iv) For the purpose of providing service to You, the School may need to disclose Your Information to its affiliates.

为向您提供服务之需，学校可能会向其关联方披露您的信息。

For external organisations and individuals with whom the School share Your Information, the School will include confidentiality clauses in the agreements with them and require them to strictly handle Your Information in accordance with relevant confidentiality and security measures.

对学校与之共享您的信息的外部组织和个人，学校会在与其签署的协议中加入保密条款，要求他们按相关的保密和安全措施严格处理您的信息。

- (b) Transfer of Information
信息转移

The School will not transfer Your personal data to any company, organisation and individual save for the following:

学校不会将您的个人信息转移给任何公司、组织和个人，但以下情况除外：

- (i) Transfer with explicit consent: Upon obtaining Your explicit consent, the School will transfer Your personal information to other parties;

在获取明确同意的情况下转让：获得您的明确同意后，学校会向其他方转移您的个人信息；

- (ii) When it involves mergers, acquisitions or bankruptcy liquidation, if it involves the transfer of personal information, the School will require the new entity holding Your Information to continue to be bound by this Policy, otherwise the School will request the said entity to obtain Your authorised consent again.

在涉及合并、收购或破产清算时，如涉及到个人信息转让，学校会要求新的持有您的信息的主体继续受此隐私政策的约束，否则学校将要求该主体重新向您征求授权同意。

(c) **Public Disclosure**

公开披露

The School will only disclose your Information under the following circumstances:

学校仅会在以下情况下，公开披露您的信息：

(i) **Upon obtaining your express consent;**

获得您明确同意后；

(ii) **Disclosure based on law: In the case of mandatory requirements by laws, legal procedures, lawsuits or government authorities, the School may disclose Your Information publicly.**

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，学校可能会公开披露您的信息。

4. Protection of Information

信息保护

(a) **The School will deploy an access control mechanism to ensure that only authorized personnel can access personal information; and the School will organize security and privacy protection training courses to enhance employees' awareness of the importance of protecting personal information.**

学校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；以及学校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。

(b) **The School will take all reasonable and feasible measures to ensure that irrelevant personal data is not collected. The School will only retain Your personal data for the period required to achieve the purpose stated in this Policy, unless the retention period needs to be extended or permitted by law.**

学校会采取一切合理可行的措施，确保未收集无关的个人信息。学校只会在达成本政策所述目的所需的期限内保留您的个人信息，除非需要延长保留期或受到法律的允许。

(c) **In the unfortunate event of the occurrence of a personal data security incident, the School will promptly inform You in accordance with**

the requirements of laws and regulations: the basic information and possible impact of such incident, the measures the School has taken or will take, suggestions You may adopt separately to prevent and reduce risks, remedies for You, etc. The School will promptly inform You about the incident by email, letter, phone, push notification, etc. If it is difficult to inform the owners of the personal data individually, the School will adopt a reasonable and effective method to publish such notification.

在不幸发生个人信息安全事件后，学校将按照法律法规的要求，及时向您告知：安全事件的基本情况、可能的影响、学校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。学校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，学校会采取合理、有效的方式发布公告。

- (d) At the same time, the School will proactively report the handling of personal data security incidents in accordance with the requirements of the regulatory authorities, such as network information department, telecommunications department and police.

同时，学校还将按照监管部门（如网信部门、电信部门、公安部门）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

- (a) Enquiry

查询

You can inquire and manage (including amending, deleting, changing or withdrawing the authorisation, etc.) the information You submitted to us by visiting the School in person. Please contact the School's admissions department for appointment.

您可以通过亲自到校方式查询、管理（包括变更、删除、改变或撤回授权同意等）您向学校提交的信息。预约时间请联络学校的招生部。

- (b) Amendment

变更

You should ensure that all information submitted to the School is accurate. If You find that the School have made errors in the collection and storage of the Information, You may request the School to correct the relevant Information in the manner set out in paragraph 5(a) above.

您应当确保向学校提交的所有信息均准确无误。如果您发现学校对信息收集、存储有错误，您可以通过上述第 5(a) 条列明的方式要求学校对相关信息予以

更正。

(c) Removal

删除

If You discovered that the School has not collected and used the Information in accordance with the provisions of laws and regulations or the provisions of this Policy, You may contact the School through the methods set out in paragraph 5(a) above to request for removal of the relevant Information.

若您发现学校未按照法律法规的规定或者本隐私政策约定收集和使用信息，您可以通过上述第 5(a)条列明的方式联系学校对相关信息进行删除。

(d) Amendment or Withdrawal of Authorisation

改变或撤回授权同意

For information collected for the purpose of marketing, You may amend or withdraw the authorisation previously provided by You. You may manage Your authorisation in the manner set out in paragraph 5(a) above. When You withdraw your authorisation, the School will no longer process Your corresponding Information. However, Your decision to withdraw Your authorisation will not affect the Information previously processed based on Your authorisation.

对于为了实现扩展业务功能之目的而收集的信息，您可以改变或撤回您的授权同意。您可以通过上述第 5(a)条列明的方式对您的授权进行管理。当您撤回同意后，学校将不再处理相应的信息。但您撤回同意的决定，不会影响此前基于您的授权而开展的信息处理活动。

(e) For security reason, You may need to provide a written request or prove your identity when you make inquiries or submit for changes or deletion of Your Information. The School may ask You to verify Your identity before processing Your request.

为保障安全，您申请查询、变更或删除您的信息时，可能需要提供书面请求，或以其他方式证明您的身份。学校可能会先要求您验证自己的身份，然后再处理您的请求。

6. Personal Data belongs to Children

儿童的个人信息

The School understand that the personal data of the Pupils it collects and uses may be minors under the age of 14 ("**Children**"). The School places great importance to the protection of Children's personal data. The School will comply with the relevant laws and regulations strictly and fulfill its

responsibility in protection of Children's personal data. The School agrees to the following:

学校了解，学校所收集、使用的学生的个人信息可能不满 14 周岁的未成年人（“儿童”）。学校非常重视对儿童个人信息的保护，学校将严格按照相关法律法规规定，落实儿童个人信息保护责任，并作出如下承诺：

- (a) Children shall not set up his or her own online account with the School without the consent of his/her parents or guardian.

未经父母或监护人同意，儿童不得创建自己的学校网上账户。

- (b) Before collecting Children's personal data, the School will remind parents or guardians of the Child to read this Policy and inform them about the collection, storage, use, transfer and disclosure of Children's personal data in accordance with relevant laws and regulations.

在收集儿童个人信息前，学校将提醒儿童的父母或监护人阅读本隐私政策，按照相关法律法规规定向其告知学校收集、存储、使用、转移、披露儿童个人信息的有关事项。

- (c) The School will only collect and use Children's personal data in strict compliance with the relevant laws and regulations and this Policy provided that authorization and consent of the Child's parent or guardian has been obtained. The School will not collect Children's personal data unrelated to the operation of the School.

学校将仅在获取儿童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、使用儿童个人信息，学校不会收集与学校运营无关的儿童个人信息。

- (d) The School will store Children's personal data in the manner and within the time limit specified in paragraph 2 of this Policy. The School will not store Children's personal data beyond the time limit necessary for the purpose of collection and use.

学校将按照本政策第 2 条规定的方式和期限存储儿童个人信息，学校存储儿童个人信息不会超过实现收集、使用目的所必需的期限。

- (e) The School will not use Children's personal data in violation of the relevant laws and regulations or the agreed purpose and scope. If it is necessary to use the data beyond the agreed purpose and scope to facilitate School operation, the School will obtain the consent of the Child's parent or guardian again.

学校不会违反相关法律法规规定或约定的目的、范围使用儿童个人信息。如因学校运营需要，确需超出约定的目的、范围使用的，学校会再次征得儿

童父母或监护人的同意。

- (f) The School will set up strict data access authority and control the scope of Children 's personal information based on the principle of minimum authorisation.

学校将以最小授权为原则，严格设定信息访问权限，控制儿童个人信息知悉范围。

- (g) Children and their parents or guardians enjoy the rights as specified in paragraph 5 of this Policy.

儿童及其父母或监护人同样享有本隐私政策第 5 条规定的权利。

- (h) The School will designate an officer to be responsible for the protection of Children 's personal data. If You have any questions, You may contact the School in accordance with the provisions of paragraph 8 of this Policy.

学校会指定专人负责儿童个人信息保护事宜，如有相关疑问可以按照本隐私政策第 8 条规定的方式与学校联系。

7. Amendment of Policy

隐私政策的修订

The School may revise this Policy from time to time to comply with the changes in the relevant laws, regulations and regulatory policies. The revised Policy will be published on the School's website or sent to your email account. If You did not raise any queries after the publication or upon receiving the revised Policy, You are deemed to have fully read, understood and accepted the revised Policy.

学校可能会并根据相关法律法规及监管政策变化的要求适时修订本隐私政策，修订后的本隐私政策将公布于学校网站或以电邮方式通知您。如您在本政策修订后没有提出疑问，即表示您已充分阅读、理解并接受更新后的隐私政策约束。

8. How to Contact the School

如何联系学校

If You have any questions, comments, suggestions or complaints relating to this Policy or Your information, You may contact the School by contacting the School's Admissions Department. Contact details are available on the School's website.

如您对本隐私政策或您的信息的相关事宜有任何问题、意见、建议或申诉，您可直接联络学校招生部。联络方式见学校网站。