



SPGS
INTERNATIONAL

SPGS International School Chengdu Privacy Policy



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Privacy Policy

隐私政策

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1. Aims and Objectives 目标

1.1 This policy applies to staff (including temporary staff, agency workers, volunteers and all other people when working in or for the school), governors, current, past and prospective students and their parents, carers or guardians (referred to in this policy as “parents”). It also applies to visitors to the school who may supply us with their personal data (e.g., when attending events).

本政策适用于学校员工（包括临时员工、代理员工、志愿者以及所有在学校工作或为学校服务的其他人员）、董事会成员、现有学生、往届学生和潜在学生及其家长、照顾者或监护人（在本政策中统称为“家长”）。它也适用于可能向我们提供个人数据的学校访客（例如，参加学校活动时）。

1.2 This policy is intended to provide information about how we will use (or “process”) personal data about individuals. This information is provided because Data Protection Law (as detailed in **Paragraph 12** below) gives individuals rights to understand how their data is used. Staff and parents are encouraged to read this privacy notice and understand the school's obligations to its entire community. Students are supplied with a copy of the summary notice *How we use your Information*.

本政策旨在说明我们如何使用（或“处理”）个人数据。提供此政策是因为《数据保护法》（如下面第12段所述）赋予个人了解其数据如何被使用方式的权利。我们鼓励教职员工和家长们阅读此隐私政策，并了解学校在此方面对整个学校社区的义务。学生们会收到一份关于我们如何使用其信息的简要说明。

1.3 This policy applies alongside any other information we may provide about a particular use of personal data, for example when collecting data via an online or paper form.

本政策适用于我们关于个人数据特定使用目的的相关信息，例如通过在线或纸质表格收集的数据。

1.4 Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and other individuals providing a service) should also be aware of and comply with this policy and the Staff Confidentiality Agreement (where applicable).

任何为学校工作或代表学校行事的人（包括员工、志愿者、董事会成员和其他提供服务的个人）也应了解并遵守本政策以及《员工保密协议》（如适用）。

1.5 If you have any questions about this policy or on how we use your personal data, please contact the Principal.

如果您对本政策或我们如何使用您的个人数据有任何疑问，请联系校长。

2. Related policies 相关政策

2.1 This policy also applies in addition to the school's other relevant terms and conditions and policies, including:

- Terms and Conditions of the Parent Contract
- the school's record retention procedures
- the school's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the school's IT policies, including the School Acceptable Use policy

- Staff Supplement, and the Online Safety policy.
- Data Protection Policy for Staff
- CCTV policy
- Use of Images and Photographs of Students Policy

此政策还适用于学校的其他相关条款和条件以及政策，包括：

- 家长合同的条款和条件
- 学校的档案保存流程
- 学校的安全保障、德育、或健康与安全政策，包括如何处理和记录问题或事件
- 学校的 IT 政策，包括《学校可接受的使用政策》
- 员工补充材料和《在线安全政策》
- 《员工数据保护政策》
- 《闭路电视政策》
- 学生图像和照片使用政策

3. Purposes for which we process personal data 我们处理个人数据的目的

3.1 We process a wide range of personal data to support our operations as an independent school. Some of this activity is required to fulfil our legal rights, duties or obligations – including those under a contract with staff, or parents of our students. We also expect that use of personal data will be made in accordance with the school's 'legitimate interests,' provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data. The following processing is carried out to fulfil our obligations and we also expect these purposes to form our legitimate interests:

作为一所独立学校，在日常运营中我们会处理各种个人数据。其中一些数据是为了履行我们的法律权利、职责或义务——包括与员工或学生家长签订的合同下的权利、职责或义务。我们也期望个人数据的使用将符合学校的“合法利益”，前提是这些利益不会对他人造成过度影响，并且不涉及特殊或敏感类型的数据。为了履行我们的义务，也期望以此构成我们的合法利益，我们执行以下数据流程：

- Selection and admissions of students (and to confirm the identity of prospective students and their parents) including assessing eligibility for means tested bursary awards.
学生的选拔和录取（并确认潜在学生及其家长的身份），包括评估其是否符合基于经济状况的助学金资格。
- Providing educational services to our students including the provision of remote education, the administration of curricular and co-curricular activities, monitoring progress, processing entries for public examinations and other assessments, publishing those results and other student achievements, reporting and storing examination and assessment results, assessing educational needs. Reporting to parents on their child's progress.
向我们的学生提供教育服务，包括提供远程教育、管理课程和课外活动、监测学习进步、报名公共考试和其他测评、发布这些测评结果和学生的其它成就、报告和存储考试和评估结果、评估教育需求。向家长报告他们孩子的学习进展情况。
- Providing other services to students including higher education applications and providing careers advice, administering IT systems in accordance with our Online Safety and Acceptable Use policies, administering school trips, providing resources (library and online), giving and receiving references for current, past and prospective students.

向学生提供其他服务，包括大学申请和职业规划建议，按照我校《在线安全》和《可接受的使用政策》管理 IT 系统，组织学校旅行，提供资源（图书馆和在线资源），为在读、往届和潜在的学生提供和接收推荐信。

- **Safeguarding our students and providing pastoral support including recording concerns and incidences of bullying, monitoring use of the internet (and email if required) in accordance with our Online Safety Policy and Acceptable Use policies and keeping records of pastoral support given.**
安全保障和人文关怀，包括记录担忧和欺凌事件，包括记录欺凌相关的问题和事件、按照我校的《在线安全政策》和《可接受的使用政策》监控互联网（如有必要，也包括电子邮件）的使用，并保存人文关怀相关的记录。
- **Maintaining relationships with alumnae and the wider school community, including the our JS and SS Education Committee and Food Committee by communicating about school activities and fundraising.**
通过沟通学校活动和筹款，与校友和更广泛的学校社区（包括我们的幼小部和中学部教育委员会及食品委员会）保持联系。
- **For the purposes of management and operations such as processing data for planning and research including that required by law (such as tax, diversity or gender pay gap analysis and census returns), to enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate (e.g., recording accidents in accordance with our health and safety policies), keeping records for insurance purposes or to obtain appropriate professional advice, keeping financial information to process invoices, fee accounts and manage debtors, compiling information for inspection by the Independent schools Inspectorate, and for commercial operations or other charitable activities.**
通过沟通学校活动和筹款，与校友和更广泛的学校社区（包括我们的幼小部和中学部教育委员会及食品委员会）保持关系。
- **To ensure our premises are secure including operating CCTV around our site and recording details of our students, staff and visitors, including taking and storing photographic images.**
为了确保学校各场所的安全，包括在我校场地安装闭路电视，并记录我校学生、员工和访客的详细信息，包括拍摄和存储照片
- **To ensure compliance with legal and regulatory requirements.**
确保遵守法律和监管要求。
- **For the purposes of fulfilling our duties as an employer including for the recruitment of staff, volunteers and contractors, conducting appropriate safeguarding checks as required by law, payroll and pension processing, keeping records of other staff matters including those relating to grievances and disciplinaries, and providing and receiving references.**
为了履行我们作为雇主的职责，包括招聘员工、志愿者和供应商，依法进行安全背景调查，处理工资和养老金，记录员工其他事务，包括与投诉和纪律相关的事务，以及提供和接收推荐信。
- **Promoting the aims and achievements of the school through our website, publications, our**

social media platforms and sometimes in the media. This includes using images (and videos) of our students in accordance with our Taking, Storing and Using Images of Students Policy.

通过我们的网站、出版物、社交媒体平台，有时还通过媒体，宣传学校的目标和成就。这包括根据我校的《拍摄、存储和使用学生图像政策》使用我们学生的图像（和视频）。

3.2 Special category data. On occasion we will need to process special category personal data (concerning health, special educational needs, counseling records, ethnicity, religion, biometrics, or sexual life/orientation) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding and employment, or from time to time, by explicit consent where required. These reasons will include:

特殊类别数据。有时，我们需要处理特殊类别的个人数据（涉及健康、特殊教育需求、咨询记录、种族、宗教、生物识别或性生活/取向）或犯罪记录信息（例如在进行 DBS 调查时），以符合法律规定的权利或义务，包括与安全保障和就业相关的权利或义务，或在有必要时在征得明确同意后进行。这些原因将包括：

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so. For example, for medical advice, for social or public health protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs.
为了保障学生的福利并提供适当的人文关怀（如有必要，也包括医疗方面），并在紧急情况、事件或事故发生时采取适当的行动，包括在符合个人利益的情况下披露个人的医疗状况或其他相关信息。例如，为了获得医疗建议、社会或公共卫生保护、安全保障、以及与警方或社会服务部门的合作、保险目的，或为了让需要了解饮食或医疗需求的餐饮供应商或学校旅行组织者知晓相关信息。
- To provide educational services in the context of any special educational needs of a student.
在学生有特殊教育需求的背景下提供教育服务。
- To monitor the effectiveness of our equal opportunities policy.
监测我们平等机会政策的有效性。
- In connection with employment of our staff. For example, DBS checks, welfare, medical information, union membership or pension plans, biometrics.
与员工雇佣相关。例如，DBS 调查、福利、医疗信息、工会会员资格或养老金计划、生物识别。
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements.
作为任何涉及此类数据的学校的或外部的投诉、纪律或调查过程的一部分，例如如果涉及特殊教育需求、健康或安全保障因素。
- For legal and regulatory purposes (for example child protection, diversity monitoring, public health and health and safety) and to comply with our legal obligations and duties of care.

出于法律和监管目的（例如儿童保护、多样性监测、公共卫生以及健康和安全）并遵守我们的法律义务和照看责任。

4. Types of personal data which we process 我们处理的个人数据类型

4.1 This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- IP addresses, location data, and website statistics and analytics;
- website cookies;
- students' dates of birth, nationalities, and family details;
- admissions, academic, disciplinary and other education-related records, references, examination scripts and marks;
- images, audio and video recordings;
- employee and former employee data including recruitment, training, performance management, payroll, and other HR information;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g., about parents who pay fees to the school, to pay staff and other workers, and for the purposes of assessing means tested financial assistance;
- past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academic records, employment and safeguarding
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the school about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students;
- correspondence with and concerning staff, students and parents, past and present; and
- images of staff and students (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system.

4.1 包括:

- 姓名、地址、电话号码、电子邮箱以及其它联系方式;
- IP 地址、地点、网站数据统计和分析;
- 学生的出生日期、国籍和家庭信息;
- 录取、学术、纪律和其他与教育相关的记录、推荐信、考试试卷和成绩;
- 图像、音频和视频录音;
- 员工和前员工数据, 包括招聘、培训、绩效管理、薪资和其他人力资源信息;
- 汽车详情 (针对使用我们停车场设施的人员);
- 银行信息和其他财务信息, 例如, 关于支付学费的家长的信息, 用于支付员工和其他工人, 以及用于评估基于收入的经济援助;
- 过去、现在和未来的学生的学习、纪律、录取和出勤记录 (包括任何特殊需求的信息), 以及考试试卷和成绩;
- 人事档案, 包括与学术记录、就业和安全保障相关的档案
- 在适当的情况下, 提供有关个人健康和福利的信息, 以及其近亲属的联系方式;
- 学校关于学生的推荐信, 或由以前的教育机构和/或其他与学生合作的专业人士或组织提供的相关信息;
- 与过去和现在的员工、学生和家长的通信; 以及教职员工和学生 (有时还有其他人员) 参与学校活动时的图像, 以及学校监控系统捕捉到的图像。

5. How the school collects data 学校如何收集数据

5.1 In most cases the school receives personal data from the individual directly. Parents provide student information when they apply or join the school. Information may be collected via a form, or simply in the ordinary course of day-to-day interaction or communication (such as email, written assessments or by engaging in various activities).

在大多数情况下，学校直接从个人那里获取个人数据。家长在申请或加入学校时提供学生信息。信息可以通过表格收集，或者在日常互动或沟通的过程中收集（例如电子邮件、书面评估或参与各种活动）。

5.2 In some cases, personal data will be supplied by third parties (e.g., another school or employer, or other professionals or authorities working with that individual); or collected from publicly available resources.

在某些情况下，个人数据将由第三方提供（例如，另一所学校或雇主，或与该个人合作的其他专业人士或当局）；或从公开可用的资源中收集。

5.3 In accordance with statutory recommendations, we use internet monitoring software for students to monitor access to unsuitable content. We do not routinely monitor email or staff internet use but may do so as part of an investigation. Please refer to our Acceptable Use and Online Safety policies.

根据法定建议，我们使用互联网监控软件来监控学生访问不当内容。我们不会定期监控电子邮件或员工的互联网使用，但在调查过程中可能会这样做。请参阅我们的《可接受使用和在线安全政策》。

5.4 We also collect data about you when:

- you have expressed an interest in having a student attend our school;
- you have registered to attend or have attended one of our events;
- you visit our website;
- you want to enroll as a parent or student;
- you sign up to receive email, our newsletter, or our prospectus;
- you have expressed in interest in working for or with us; or
- you are employed by us or an organisation with whom we have a business relationship.

我们还会在以下情况下收集您的数据：

- 您表示有兴趣让一名学生就读我校；
- 您已注册参加或已参加我们的其中一项活动；
- 您访问我校的网站；
- 你想以家长或学生的身份注册我校；
- 您注册同意接收电子邮件、我校的新闻通讯或宣传手册；
- 您表示有兴趣为我们工作或与我们合作；或者
- 您受雇于我们或与我们有业务关系的组织。

6. Who has access to personal data and who we share it with 谁可以访问个人数据以及我们与谁共享这些数据

6.1 For the most part, personal data collected by us will remain within the school and will be processed by appropriate individuals in accordance with access protocols. Particularly strict rules of access and sharing apply in the context of:

在大多数情况下，我们收集的个人信息将保留在学校内部，并由适当的人员根据访问协议进行处理。

在以下情况下，适用特别严格的访问和共享规则：

- medical records held and managed by appropriate medical staff, or otherwise in accordance with express consent. The school's medical team may disclose confidential information if it is considered to be in the student's best interest or necessary for the protection of other members of the school community. Images of students with serious medical conditions and allergies may be displayed in appropriate areas of the school, such as staff rooms, and are available on the staff portal; and 由适当的医疗人员持有和管理的医疗记录，或在明确同意的情况下进行处理。学校的医疗团队可以披露机密信息，如果认为这样做符合学生的最佳利益或有必要保护学校社区的其他成员。患有严重医疗状况和过敏反应的学生的照片可能会展示在学校的适当区域，例如教职员工休息室，并且可以在教职员工门户网站上查看；并且
- confidential pastoral or safeguarding records are held centrally on MyConcern. Access is tiered according to specific permission levels decided by the Director of Pastoral Care. 机密的人文关怀或安全保障记录集中保存在 MyConcern 上。访问权限根据人文关怀副校长决定的特定权限级别分层。

6.2 If required, this type of personal data will only be shared on a confidential 'need to know' basis (see below).

如果需要，这类个人数据将仅在保密的“需要知道”基础上共享（见下文）。

6.3 A certain amount of any SEN student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

在提供学生所需的必要照顾和教育的背景下，必须向更广泛的工作人员提供特殊教育需求学生的一部分信息。

6.4 The school will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g., lawyers, insurers, PR advisers and accountants)
- government authorities (e.g., Education Bureaus, Department of Foreign Affairs, police, the local authority or local health protection team)
- appropriate regulatory bodies e.g., Teaching Regulation Agency (TRA), the Independent Schools Inspectorate; and
- companies which organise activities on behalf of the school (e.g., school trip providers).

学校需要与第三方分享其成员的个人信息，例如：

- 专业顾问（例如，律师、保险公司、公共关系顾问和会计师）
- 政府部门（例如，教育局、外交部、警察、地方当局或地方卫生防护团队）
- 合理的监管机构，例如：教师监管局（TRA）、独立学校检查局；以及
- 代表学校组织活动的公司（例如，学校旅行的供应商）。

6.5 Data transferred to awarding bodies 数据已传输到颁奖机构

Student personal data will be shared with awarding bodies for the purpose of examining and awarding qualifications. Awarding bodies in turn may be required to provide our students' personal data to educational agencies such as UCAS, Cambridge International Education, GL Assessment, and other local agencies. This data may also be used for statistical and policy development purposes.

学生个人数据将与颁发机构共享，以便进行资格审查和授予。颁发机构可能需要将我们的学生个人数据提供给教育机构，例如 UCAS、剑桥国际教育、GL 评估以及其他本地机构。这些数据也可能用

于统计和政策发展目的。

6.6 Safeguarding 学生安全保障

Staff, students and parents are reminded that the school is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to us, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the education bureau or police. For further information about this, please read our Safeguarding (child protection) policy. We keep a record of safeguarding concerns that are reported even if they do not meet the statutory thresholds for reporting on a confidential basis.

提醒教职员工、学生和家，学校有法律和法定指导方针（包括《保护儿童教育安全》）规定的职责，记录或报告发生或汇报给我校的事件和问题，在某些情况下，无论这些事件是否被证明，只要它们在性质或频率上达到一定的严重性阈值。这可能包括对人员或保护文件的记录，在某些情况下，还可能会向相关部门如教育局或警方进行报告。有关更多信息，请阅读我们的儿童保护政策。我们会记录所有涉及安全保障的问题，即使它们未达到法定报告标准，也会以保密的方式进行记录。

6.7 Processing by third parties 由第三方进行

Some of our processing activity is carried out on our behalf by third parties such as database providers, web developers and data storage providers. This is subject to contractual assurances that personal data will be kept securely and only in accordance with the school's agreement and/or specific direction. A third party may also pass on, or contract with, a sub-processor. This would only be with our prior authorisation and under a written contract. Please also refer to Paragraph 11 below for the transfer of personal data to other countries.

我们的一些理活动处是由第三方代表我们进行的，例如数据库提供商、网页开发人员、和数据存储提供商。依据与第三方的合同保证，确保个人数据将被安全保存，并且仅按照学校的协议和/或具体指示进行处理。第三方也可能将数据转交给或与子处理器签订合同。这仅在我们事先授权并签订书面合同的情况下进行。请参阅下面的第 11 章有关将个人数据转移到其他国家的信息。

7. How long we keep personal data 我们保留个人数据多久

7.1 The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

学校将安全地保留个人数据，并仅在出于合法和正当理由所需的时间内保留。

7.2 If you have any specific queries about how long we keep records or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Principal at the school (see contact details below). Please bear in mind that we will often have lawful and necessary reasons to hold on to some personal data even following such request.

如果您对我们保存记录的时间有任何具体疑问，或希望请求删除您认为不再相关的个人数据，请联系学校校长（见下方联系方式）。请注意，即使在收到此类请求后，我们通常也会有合法和必要的理由保留某些个人数据。

7.3 A reasonable amount of information will be kept for the school's historical archive.

合理数量的信息将被保留在学校的历史档案中。

8. Keeping in touch and supporting the school 保持联系并支持学校

8.1 We will use the contact details of parents, alumnae and other members of the school community to keep them updated about the activities of the school (including fundraising initiatives) and alumnae and parent events of interest, including by sending updates and newsletters by email and by post.

我们将使用家长、校友和其他学校社区成员的联系方式，向他们通报学校的活动（包括筹款活动）以及校友和家长感兴趣的活动，包括通过电子邮件和邮寄发送更新和通讯。

9. Your rights 您的权利

9.1 Access 访问数据

Individuals have the right to access and understand personal data held about them, and in some cases ask for it to be erased or amended or have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations. If you wish to access or transfer data to another person or organisation, or you have another objection to how your personal data is used, please put your request in writing to the Principal.

个人有权访问和了解关于他们个人的数据，并在某些情况下要求删除或修改这些数据，或将其转移给他人，或要求学校停止处理这些数据——但须遵循某些例外和限制。如果您希望访问或将数据转移给其他人或组织，或者您对个人数据的使用有其他异议，请以书面形式向校长提出请求。

We will aim to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits which is usually one month in the case of requests for access to information.

Fulfilling more complex or multiple requests e.g., those involving third party information may take longer.

We will make you aware if that is the case.

我们将尽力在合理可行的情况下尽快回应任何此类书面请求，并且在任何情况下都将在法定时限内回应，通常情况下，获取信息的请求的法定时限为一个月。满足更复杂或多个请求，例如涉及第三方信息的请求，可能需要更长时间。如果是这种情况，我们会通知您。

The school will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, we may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

学校将能够更快地响应较小、针对性的信息请求。如果信息请求明显过多或类似于之前的请求，我们可能会要求您重新考虑，或收取相应的费用（但仅在数据保护法允许的情况下）。

9.2 Accuracy 准确性

We will aim to keep information we hold about you up to date and as accurate as possible. You can ask us to erase or correct any out of date, irrelevant or inaccurate information we hold about you (subject to certain limitations and exemptions under Data Protection Law). Please contact the appropriate department at the school if you want to amend your personal information. This will usually be the Admissions office for parents and student personal details, HR for staff personal details and the finance office for financial details.

我们将尽力保持我们所持有的关于您的信息是最新的且尽可能准确。您可以要求我们删除或更正我们持有的任何过时、不相关或不准确的信息（受数据保护法下某些限制和豁免的约束）。如果您想修改您的个人信息，请联系学校的相关部门。这通常是招生办公室负责家长和学生个人信息，人力资源部负责员工个人信息，财务办公室负责财务信息。

You should note that the school will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all

parties' viewpoints.

请注意，学校不一定会仅仅根据对账户有异议的个人的请求删除或修改观点、意见、笔记或记录，尽管我们可能会保留所有相关方的观点记录。

9.3 Requests that cannot be fulfilled 无法满足的请求

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (parents need to be aware this may include their own children, in certain limited situations – please see further below and students and alumnae need to be aware that this may include their parents/guardians), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

您应当注意，访问权仅限于您自己的个人数据，并且某些数据不在访问权范围内。这将包括能识别出其他人的信息（家长需要注意，这可能包括他们自己的孩子，在某些有限的情况下——请见下文，学生和校友需要注意，这可能包括他们的家长/监护人），或受法律特权保护的信息（例如，学校提供或寻求的法律建议，或与法律诉讼相关的文件）。

The school is also not required to disclose any student examination scripts (or other information consisting solely of student test answers – although markers' comments may still be disclosable if they constitute personal data); provide examination or other test marks ahead of their ordinary publication date; nor share any confidential reference held by the school that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

学校也不需要披露任何学生考试试卷（或仅由学生测试答案组成的信息——但如果评分者的评论构成个人数据，仍然可以披露）；提前提供考试或其他测试成绩；也不需要分享学校持有的任何机密推荐信，这些推荐信是（或将会）用于任何个人的教育、培训、任命或雇佣目的。

You may have heard of the “right to be forgotten.” However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this policy. All such requests will be considered on their own merits.

您可能听说过“被遗忘权”。然而，我们有时会有充分的理由拒绝特定请求，例如修改、删除或停止处理您（或您孩子的）个人数据：例如，法律要求，或属于本政策中确定的合法利益。所有此类请求将依据情况酌情考虑。

9.4 Student requests 学生请求

Students can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making (see the subsection *Whose rights?* below). A student of any age may ask a parent or other representative to make a subject access request on their behalf.

学生可以请求访问他们自己的个人数据，前提是学校合理认为他们具备足够的成熟度来理解他们所提出的请求（见下文“谁的权利？”小节）。任何年龄的学生都可以要求家长或其他代表代其提出主体访问请求。

9.5 Parental requests 家长请求

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about students without their consent. The school may consider there are lawful grounds for sharing with or without reference to that student.

应明确理解，关于主体访问的规则并不是处理信息请求的唯一依据。家长可能没有法定的信息权利，但他们和其他人通常会对在未征得学生同意的情况下接收某些关于学生的信息有合法的兴趣或期要求。学校因此可能会认为有合法的理由，在有或没有该学生知情的情况下与家长共享信息。

Parents will in general receive educational and pastoral updates about their children in accordance with the school's assessment and reporting procedures.

家长通常会根据学校的评估和报告流程，收到关于他们孩子的教育和德育方面的信息。

All information requests from, on behalf of, or concerning students – whether made under subject access or simply as an incidental request which falls outside the routine provision of information to parents – will therefore be considered on a case-by-case basis.

因此，所有来自学生、代表学生或与学生有关的信息请求——无论是常规访问请求，还是作为偶然请求，即使超出了向家长提供常规信息的范围——都将被酌情考虑。

9.6 Consent 同意

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please refer to the Parent Contract for details on how to do this. Examples where we do rely on consent are for the use of certain images and certain types of fundraising. Please be aware, however, that the school may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

当学校依赖征得同意作为处理个人数据的手段时，任何人可随时撤回其许可（须遵循上述类似的年龄考虑）。请参阅家长合同以获取如何执行此操作的详细信息。我们依赖征得许可的例子包括使用某些图像和某些类型的筹款活动。请注意，然而某些情况下，学校可能并不依赖于征得许可，而是有其他合法理由在没有您同意的情况下处理相关个人数据。

That reason will usually have been asserted under this policy or may otherwise exist under some form of contract or agreement with the individual (e.g., an employment or parent contract, or because a purchase of goods, services or membership).

这种情况通常会在本政策下被提出，或者以某种形式存在于与个人的合同或协议中（例如，雇佣合同或家长合同，或因购买商品、服务或会员资格）

9.7 Whose rights? 谁的权利

The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority for the necessary ways it processes personal data relating to students – for example, under the parent contract, or via a form. Parents and students should be aware that this is not necessarily the same as the school relying on strict consent (see section on *Consent* above).

根据数据保护法，数据保护的权力属于数据相关的个人。然而，学校通常会依赖家长的授权来处理与学生相关的个人数据，例如通过家长合同或表格。家长和学生应当意识到，这不一定等同于学校依赖严格的同意（见上文关于同意的部分）。

Where consent is required, it will usually be appropriate, given the nature of the processing in question, and the student's age and understanding, to seek the student's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

在需要同意的情况下，通常来说，鉴于处理的性质以及学生的年龄和理解能力，寻求学生的同意是合适的。家长应当意识到，在这种情况下，他们可能不会被通知，这取决于孩子的利益、家长在法律或合同下的权利以及所有相关情况。

The school will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g., for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the school's opinion, there is a good reason to do otherwise.

学校将假定，普通情况下不需要学生同意即可向其家长披露学生的个人数据，例如，为了让家长了解学生的活动、进展和行为，并且为了学生的利益。也就是说，除非学校认为有充分理由需要另行处理。

However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school may be under an obligation to maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example, where the school believes disclosure will be in the best interests of the student or other students, or if required by law.

然而，如果学生希望秘密地与教职员提出其担忧，并明确不同意将其个人数据透露给家长，学校可能有义务为其保持保密，除非学校认为有充分理由这样做；例如，学校认为披露信息将符合学生或其他学生的最佳利益，或法律要求披露。

10. Transfer of personal data to other countries 将个人数据转移到其他国家

10.1 We may need to send personal data to other countries (e.g., for school trips or to store your information on cloud-based storage based overseas). In cases where the school needs to share personal data outside of China, the school will only do so subject to contractual assurances that personal data will be kept securely and only in accordance with the school's agreement and/or specific direction (see Appendix B).

我们可能需要将个人数据发送到其他国家（例如，学校旅行或将您的信息存储在海外的云存储中）。在学校需要将个人数据共享到中国以外的国家的情况下，学校只会在有合同保证的前提下进行共享，确保个人数据将被安全保存，并且仅按照学校的协议和/或具体指示进行（见附录 B）。

10.2 If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK. We will take steps to ensure that your privacy rights continue to be protected.

如果我们发送的关于您的信息到另一个国家而这个国家不在名单上，或者不是欧洲经济区（即欧盟、列支敦士登、挪威和冰岛）内的国家，那么该国对个人信息的保护级别可能不如英国。我们将采取措施确保您的隐私权继续受到保护。

11. Review and legal framework 审查和法律框架

11.1 We will review and update this policy from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

我们会时不时审查和更新本政策。任何影响您权利的重大变更，将在合理可行的范围内直接通知给您。

11.2 Various laws in China underpin this policy and are as follows:

- Personal Information Protection Law of the People's Republic of China (Effective November 1, 2021)
- Data Security Law of the People's Republic of China (Effective September 1, 2021)
- Cybersecurity Law of the People's Republic of China (Effective June 1, 2017)

- Measures for Security Assessment of Cross-Border Data Transfers (Effective September 1, 2022)
- Measures on Standard Contracts for Cross-Border Personal Information Transfers (Effective June 1, 2023)

中国的各种法律为我校这一政策提供相应支持，具体如下：

- 中华人民共和国个人信息保护法（自 2021 年 11 月 1 日起生效）
- 中华人民共和国数据安全法（2021 年 9 月 1 日生效）
- 中华人民共和国网络安全法（2017 年 6 月 1 日生效）
- 跨境数据传输安全评估办法（自 2022 年 9 月 1 日起生效）
- 个人信息出境标准合同办法（自 2023 年 6 月 1 日起生效）

11.3 The legal framework below provides additional guidance and serves to inform the contents of this policy.

- The UK General Data Protection Regulation (from 1 January 2021)
- The Data Protection Act 2018 and related legislation (from 25 May 2018 and as amended on 1 January 2021)
- The Privacy and Electronic Communications Regulations 2011 (PECR) and the Privacy and Electronic Communications (Amendment) Regulations 2018
- The Protection of Freedoms Act 2012 (biometrics and CCTV)

以下法律框架提供了额外的指导，并有助于您掌握本政策的内容。

- 英国通用数据保护条例（自 2021 年 1 月 1 日起）
- 2018 年数据保护法及相关立法（自 2018 年 5 月 25 日起生效，并于 2021 年 1 月 1 日修订）
- 2011 年隐私和电子通信条例（PECR）和隐私
- 电子通信（修订）条例 2018
- 2012 年自由保护法（生物识别技术和闭路电视）

12. Queries and complaints 疑问和投诉

12.1 Any comments or queries about this policy should be directed to the Principal using the contact details below. Any complaint will be handled as soon as possible, however if it is received during the school holidays, response times may be longer. A response to a complaint will be given in writing and you may be asked to provide additional details, or to attend a meeting with a senior member of the school. If you remain unsatisfied with the outcome of your complaint, you may refer the matter to the Clerk to the Governors sabrina.li@spgs-shengbo.com for consideration by a member of the school's Governing Board.

关于本政策的任何意见或查询应使用以下联系方式直接联系校长。任何投诉将尽快处理，但如果在学校假期期间收到，学校的响应时间可能会更长。对投诉的回应将以书面形式提供，您可能被要求提供更多细节，或与学校的高层领导面谈。如果您对投诉的结果仍然不满意，您可以将此事提交给校董会助理 sabrina.li@spgs-shengbo.com，由校董会成员进行审议。

13. Contacts 联系方式

No.6-8 Shengxing Alley, High-tech Zone, Chengdu | 成都市高新区盛兴街 6-8 号

Principal: seniorschooloffice@spgs-shengbo.com （校长）

Clerk to the Governors: sabrina.li@spgs-shengbo.com （校董会助理）

Appendix A – Personal Information Collection Statement 个人信息收集声明

1. This is a personal data collection statement made under applicable data privacy laws.

这是根据适用的数据隐私法律所做的个人数据收集声明。

2. Personal data provided by you to SPGS International School Chengdu will be used for the school to perform its administrative, education, academic and research functions, and for the directly related purposes.

您提供给成都晟珀学校的个人数据将用于学校执行其行政、教育、学术和研究职能，以及与之直接相关的目的。

3. Unless otherwise specified, the provision of personal data is voluntary. However, failure to provide the relevant personal data will render the school unable to perform the relevant functions, e.g. unable to consider your application or to provide relevant consultations.

除非另有说明，提供个人数据是自愿的。然而，如果未能提供相关的个人数据，学校将无法履行相关职能，例如无法考虑您的申请或提供相关咨询。

4. If you are under the age of 18, we strongly encourage you to consult your parent or guardian before providing your personal data or ask your parent or guardian to fill in the relevant form on your behalf.

如果您未满 18 岁，我们强烈建议您在提供个人数据之前咨询您的家长或监护人，或请您的家长或监护人代您填写相关表格。

5. The information we collect are mainly as follows: 我们收集的信息主要如下：

- a. Personal details of pupils and students, and parents: name of child, date of birth, gender, place of birth, private address, private telephone number, email address, parents name and contact details, date of birth, emergency contact, days of absence, bank account details of parents, needs reports, recording of medical data and incidents, special educational needs records and dietary requirements;

学生和家长的个人信息：孩子的姓名、出生日期、性别、出生地点、家庭住址、家庭电话号码、电子邮件地址、家长的姓名和联系方式、出生日期、紧急联系人、缺勤天数、家长的银行账户信息、需求报告、医疗数据和事件记录、特殊教育需求记录和饮食要求；

- b. Educational information; prep school and university attendance, tuition and extra-curricular accounts, attendance and non-attendance records, exam details and results, curricular activities; performance and educational needs reports, incident reports involving pupils or students;

教育信息：学校和大学的出勤情况、学费和课外活动账户、出勤和缺勤记录、考试详情和结果、课程活动；表现和教育需求报告、涉及学生的事件报告；

- c. Achievements; sports teams and positions of responsibility;

各项成就：参与的体育队和责任职位；

- d. Membership of any clubs and societies within the school; and

在学校内任何俱乐部和社团的成员资格；以及

- e. Event attendance and work experience placements.

活动出席和工作经验实习

6. The purposes and use of the personal data collected are elaborated as follows:

收集的个人数据的目的和使用如下所述：

- a. As a basis for selection for admission and communication admission-related matters; 作为录取选择的依据、和沟通与录取相关事宜；
- b. For awarding scholarships; 为颁发奖学金；
- c. As evidence for verification of your identity, your qualifications and academic records in relevant schools in China or other places, and other information provided in the forms or documents; 作为验证您身份、资格、和在中国或其他地方相关学校的学术记录以及在表格或文件中提供的其他信息的证据；
- d. Identify possible multiple applications and records of your previous and existing studies at this school or other schools (if applicable); 确定您在本校或其他学校（如适用）之前和现有学习的多个申请和记录；
- e. For all purposes relating to studies at, activities conducted by, and facilities, services and benefits provided by the school (in particular those governed by the relevant school regulations, policies and procedures). Personal data and photo images of students may also be used by the school for the production of membership cards and conduct of activities; 为了与学校的学习、学校开展的活动以及学校提供的设施、服务和福利（特别是那些受相关学校规章、政策和程序管理的）相关的所有目的。学生的个人数据和照片也可能被学校用于制作会员卡和开展活动；
- f. Maintaining contact, updating the latest developments of the school, and provision of information; and 维持联系，更新学校的最新动态，并提供信息；以及
- g. Subject to your consent, we, our affiliated schools and companies may use your personal data (including name, gender, telephone number, fax number, location, postal address, email address, month and year of birth, as well as the information relating to academic results) for education related marketing purposes. We may dispatch to you the promotional information via direct marketing telephone calls, email, e-message, facsimile, direct mailings etc.

在您同意的情况下，我们、我们的附属学校和公司可能会使用您的个人数据（包括姓名、性别、电话号码、传真号码、地点、邮政地址、电子邮件地址、出生月份和年份，以及与学术成绩相关的信息）用于教育相关的宣传目的。我们可能通过电话宣传、电子邮件、电子信息、传真、直接邮寄等方式向您发送宣传信息。

7. Personal data will be kept confidential and handled by the school's staff members. Nonetheless, we may disclose and transfer (whether in China or overseas) your personal data to the following parties to use, disclose, process or retain your personal data for the purposes mentioned above and/or to undertake some of the school's academic, research and administrative functions, and for other purposes as shall be agreed between you and us or required by law from time to time:

个人数据将被保密，并由学校工作人员处理。尽管如此，我们可能会向以下各方披露和转移（无论是在中国还是海外）您的个人数据，以使用、披露、处理或保留您的个

人数据，目的如上所述和/或承担学校的一些学术、研究和行政职能，以及其它经您和我们同意或法律不时要求的目的：

- a. Our agents and contractors and service providers (e.g. processing of student visa, arrangement of activities such as exchanges, internships, placements and field trips, granting of scholarships and financial aids); 我们的代理商、承包商和服务提供商（例如，处理学生签证、安排交流、实习、实习和实地考察等活动、提供奖学金和助学金）；
 - b. Our affiliated schools and companies; 我们的附属学校和公司；
 - c. Bank, financial institutions and credit providers; 银行、金融机构和信贷提供者；
 - d. Debt collection agencies, credit reference agencies and security agencies; 债务催收机构、信用参考机构和安全机构；
 - e. Regulatory bodies, law enforcement agencies and courts; and 监管机构、执法机构和法院；以及
 - f. Our professional advisers. 我们的专业顾问。
8. In case of application for admission to a programme jointly offered or collaborated by the school and its partner institution(s) or organisation(s), your personal data provided to the school may be transferred to the partner institution(s) or organisation(s) concerned for the purposes as stated in Paragraph 6 above.

如果申请入读由学校与其合作院校或组织共同提供或合作的课程，您提供给学校的个人数据可能会根据上述第六段的目的转移给相关的合作院校或组织。

9. If you are admitted as a student of the school, your personal data provided during the application process will be transferred to the student record system of the school, together with your personal data (including the photo image) provided during registration, to become part of your official student records.

如果您被学校录取，您在申请过程中提供的个人数据将与您在注册时提供的个人数据（包括照片）一起转入学校的学生信息管理系统，成为您官方学生记录的一部分。

10. The school may from time to time include photographs or images of students in the school's promotional material such as prospectuses and websites. The school will not disclose the full name or home address of a student without the parent's consent.

学校可能会时不时在学校的宣传材料中（如招生简章和网站）包含学生的照片或图像。学校在未经家长同意的情况下，不会披露学生的全名或家庭地址。

11. Personal data of the students of the school (including study records) will be used by the school during their studies at and after they leave the school for conducting statistical analysis, research, survey, review and audit.

学校将使用学生的个人数据（包括学习记录），在他们在校期间及离校后进行统计分析、研究、调查、审查和审计。

12. If at any time in the future you do not wish to receive marketing promotional information from us with respect to the school or our affiliated organisations, or do not wish us to disclose, transfer or use your personal data for the aforesaid marketing purposes, please contact the school's Marketing and Admissions

Department to update your instruction.

如果您在未来的任何时候不希望收到我们关于学校或我们附属机构的市场宣传信息，或者不希望我们披露、转让或使用您的个人数据用于上述宣传目的，请联系学校的市场和招生部以更新您的请求。

13. You have the right to request the school to ascertain whether they hold your personal data, to be given a copy, and to apply for correction of the data, if deemed incorrect. Applications for access to and correction of personal data should be made by making a request and on payment of a handling fee. Request for correction of personal data should be made in writing with supporting documentation. Please address such applications and request to the school's Marketing and Admissions Department.

你有权要求学校确认他们是否持有你的个人数据，索取副本，并在数据被认为不正确的情况下申请更正。申请访问和更正个人数据应通过提出请求并支付处理费用来进行。请求更正个人数据应以书面形式提出，并附上相关文件。请将此类申请和请求提交给学校的市场与招生部。

Appendix B – Cross-Border Transfer of Personal Information: Core Legal Provisions

个人信息出境相关法律法规

1. Personal Information Protection Law of the People's Republic of China (Effective November 1, 2021) 《中华人民共和国个人信息保护法》，2021 年 11 月 1 日起实施

Chapter III: Rules on Cross-Border Provision of Personal Information 第三章：个人信息跨境提供的规则

Article 38: Personal information handlers providing personal information overseas must meet one of the following conditions:

- Pass a security assessment organized by the national cyberspace administration;
- Obtain personal information protection certification from a qualified professional institution;
- Enter into a standard contract with the overseas recipient (filing required);
- Other conditions specified by laws, regulations, or the national cyberspace administration.

第三十八条 个人信息处理者因业务等需要，确需向中华人民共和国境外提供个人信息的，应当具备下列条件之一：

- （一）依照本法第四十条的规定通过国家网信部门组织的安全评估；
- （二）按照国家网信部门的规定经专业机构进行个人信息保护认证；
- （三）按照国家网信部门制定的标准合同与境外接收方订立合同，约定双方的权利和义务；
- （四）法律、行政法规或者国家网信部门规定的其他条件。

Article 40: Critical Information Infrastructure Operators (CIIO) and personal information handlers processing personal information exceeding thresholds specified by the national cyberspace administration must store personal information domestically. Cross-border transfers are permitted only after passing a security assessment where truly necessary.

第四十条 关键信息基础设施运营者和处理个人信息达到国家网信部门规定数量的个人信息处理者，应当将在中华人民共和国境内收集和产生的个人信息存储在境内。确需向境外提供的，应当通过国家网信部门组织的安全评估。

Article 55 & 56: A Personal Information Protection Impact Assessment (PIA) must be conducted before cross-border transfers. Assessment reports shall be retained for at least 3 years.

第五十五条和五十六条：个人信息处理者应当事前进行个人信息保护影响评估。个人信息保护影响评估报告和处理情况记录应当至少保存三年。

2. Data Security Law of the People's Republic of China (Effective September 1, 2021) 《中华人民共和国数据安全法》，2021 年 9 月 1 日起实施

Article 31: Security management for cross-border transfers of important data shall follow the Cybersecurity Law, requiring a security assessment.

第三十一条：关键信息基础设施的运营者在中华人民共和国境内运营中收集和产生的重要数据的出境安全管理，适用《中华人民共和国网络安全法》的规定。

Article 36: Data stored domestically shall not be provided to foreign judicial or law enforcement agencies without approval from competent authorities.

第三十六条：非经中华人民共和国主管机关批准，境内的组织、个人不得向外国司法或者执法机构提供存储于中华人民共和国境内的数据。

3. Cybersecurity Law of the People's Republic of China (Effective June 1, 2017) 《中华人民共和国网络安全法》

Article 37: CIIOs collecting personal information and important data during domestic operations must store such data domestically. Cross-border transfers require a security assessment where truly necessary.

第三十七条 关键信息基础设施的运营者在中华人民共和国境内运营中收集和产生的个人信息和重要数据应当在境内存储。因业务需要，确需向境外提供的，应当按照国家网信部门会同国务院有关部门制定的办法进行安全评估。

II. Administrative Regulations and Departmental Rules

1. Measures for Security Assessment of Cross-Border Data Transfers (Effective September 1, 2022)

跨境信息传输安全评估（自 2022 年 9 月 1 日起实施）

Scope of Application: 使用范围

- Cross-border transfers of important data; 数据处理者向境外提供重要数据;
- Cross-border transfers of personal information by handlers processing ≥ 1 million individuals; 处理 100 万人以上个人信息的数据处理者向境外提供个人信息
- Cumulative cross-border transfers since January 1 of the previous year: 自上年 1 月 1 日起累计
 - $\geq 100,000$ individuals' personal information; 累计向境外提供 10 万人个人信息
 - $\geq 10,000$ individuals' sensitive personal information. 累计向境外提供 1 万人敏感个人信息的数据处理者

Assessment Process: 评估流程

- Application Materials: 申报材料
 - Self-assessment report on risks of cross-border data transfer; 数据出境风险自评估报告
 - Legal documents (e.g., contracts). 数据处理者与境外接收方拟订立的法律文件;
- Approval Timeline 评估期限: 45 working days from acceptance (extendable). 自发出书面受理通知书之日起 45 个工作日内
- Validity Period 有效期: Assessment results are valid for 2 years; reapplication is required upon expiration. 有效期为 2 年; 过期重新申报评估。

2. Measures on Standard Contracts for Cross-Border Personal Information Transfers (Effective June 1, 2023)

《个人信息出境标准合同办法》2023 年 6 月 1 日起实施

Applicability 适用情形:

- Non-CIIOs; 非关键信息基础设施运营者
- Process personal information of fewer than 1 million individuals; 处理个人信息不满 100 万人的
- Cumulative cross-border transfers since January 1 of the previous year: 自上年 1 月 1 日起累计
 - $< 100,000$ individuals' personal information; 累计向境外提供个人信息不满 10 万人的
 - $< 10,000$ individuals' sensitive personal information. 累计向境外提供敏感个人信息不满 1 万人的

Filing Requirements: File the signed standard contract with provincial cyberspace administrations within 10 working days. 合同备案: 个人信息处理者应当在标准合同生效之日起 10 个工作日内向所在地省级网信部门备案。