

# Veolia China - Guidelines on Personal Information Protection Policy

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Veolia in China strongly believes that the respect of privacy and the protection of personal data are a cause of great concern and a means to create trust.

In that perspective, Veolia in China adopts guidelines to provide practical recommendations to comply with key requirements of PRC laws and regulations (such as Cyber Security Law, Data Security Law, and Personal Information Protection Law (“PIPL”), etc.), and Veolia Group policies (such as Personal Data Privacy Policy).

These guidelines must be implemented in all the entities established in the People’s Republic of China (“PRC” or “China”, for the sole purpose of these guidelines, not including Hong Kong SAR, Macau SAR and Taiwan Province) and controlled<sup>1</sup> by Veolia (hereinafter “Veolia China”) in order to set some common rules for the protection of personal data (the “Guidelines”).

## Scope

Each entity controlled by Veolia in PRC shall establish a Personal Information Protection Policy, which must follow the common standard set up below.

## Data Protection Officer and Data Protection Manager for Personal Data

Veolia in China set up the following organisation responsible for the proper implementation and compliance with these Guidelines:

- ❖ the Data Protection Officer for Asia Zone (Asia DPO);
- ❖ the Data Protection Manager for Personal Data for PRC (China DPM), acting as the person in charge of personal information protection matters in China, is the Asia DPO’s contact on all issues related to personal information, and monitors the PRC country BU compliance with these Guidelines;
- ❖ the General Manager of each entity is China DPM’s contact on all issues related to personal data, and monitors compliance with these Guidelines within its entity; and
- ❖ It is the responsibility of all employees who process Personal Data for or on behalf of Veolia China to comply with this Guidelines and Policy in their daily job.

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<sup>1</sup> “control” means the possession, directly or indirectly, of the power to direct or cause the direction of the management of such entities, whether through the ownership of voting securities, by contract or otherwise.

**VEOLIA CHINA PERSONAL INFORMATION PROTECTION POLICY**

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## 1. Definition

“**Personal Information / Personal Data**” refers to any kind of information, in electronic form or other forms, that is related to identified or identifiable natural persons (“**Data Subjects**”), including but not limited to name, birth date, identification number, telephone number, email address, correspondence address, residential address, account information, credit information, biometric information, health information, financial information, and location data.

An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, psychological, biometric, economic, cultural or social identity of that natural person.

*Note: fully anonymized data is not Personal Information as long as such data is unable to identify any Data Subject and such anonymization cannot be recovered.*

“**Sensitive Personal Information**” refers to the personal information that, once leaked or illegally used, is likely to result in damage to the personal dignity of the Data Subjects or damage to his or her personal or property safety, including biometric identification, religious belief, specific identity, medical health, financial account, whereabouts and tracks, the personal information of minors under the age of 14, etc.

“**Critical Information Infrastructure(CII)**” refer to the important network facilities and information systems in important industries and fields such as public telecommunications, information services, energy, transportation, water conservancy, finance, public services, e-government and national defense science, technology and industry, as well as other important network facilities and information systems which, in case of destruction, loss of function or leak of data, may result in serious damage to national security, the national economy and the people's livelihood and public interests, subject to the identification of the relevant authorities according to the identification rules of CII.

Please refer to **Appendix 1** for further detailed definitions and examples.

## 2. Processing of Personal Information

The processing of Personal Information includes the collection, storage, use, processing, transmission, provision, disclosure and deletion, etc. of personal information.

Personal Information processor is an organization or individual that can autonomously determine the purposes and methods of data processing.

If Veolia China is identified as a **CII operator**, Veolia China will be subject to enhanced obligations to process Personal Information, e.g. data localization, as well as technical protection measures and other necessary measures to be taken in order to guarantee the safe and stable operation of CII.

- ❖ Personal Information shall be processed following the principles of legality, legitimacy, necessity and good faith

The Guidelines aim to ensure that the processing of Personal Information is in line with the above principles and without adversely affecting the rights of the Data Subject.

- ❖ Personal Information shall be processed for a minimized purpose

The processing of Personal Information shall be for a definite and reasonable purpose, be directly related to the purpose of processing and shall be conducted in a way that minimizes the impact on personal rights and interests.

- ❖ Legal basis for processing of Personal Information

Veolia China will process Personal Information only when it has a valid and appropriate legal basis, including:

- where the consent of Data Subject concerned is obtained;
- where it is necessary to conclude or perform a contract to which the individual concerned is a party;
- where it is necessary to implement human resources management in accordance with the lawfully formulated labor rules or the lawfully concluded collective contract;
- where it is necessary to perform the statutory duties or statutory obligations;
- where it is necessary to tackle public health emergencies or to protect natural persons' life, health or property;
- process within a reasonable scope in accordance with the PIPL the Personal Information that is published by the individual concerned or otherwise lawfully published;
- process Personal Information within a reasonable scope in order to carry out news reporting and public opinions supervision for public interests; **or**
- Otherwise provided by laws and administrative regulations.

The above consent, if relied upon as the legal basis of processing, should be given by the Data Subject concerned voluntarily and clearly after being fully informed. Where a "separate consent" is required under applicable data protection laws, such consent should be obtained in a separate manner as opposed to "bundled" consent. The Data Subject should be entitled to withdraw his/her consent. Veolia China will provide a convenient method for the Data Subject to withdraw his/her consent.

Where the purpose or method of processing Personal Information or the type of Personal Information to be processed changes, the consent of the Data Subject concerned shall be obtained again.

❖ Personal Information will be processed in a transparent manner

Regardless of the legal basis of processing, Veolia China (as Personal Information processor) should, prior to the processing, truthfully, accurately and completely inform Data subjects of the following matters in a conspicuous manner and in clear and understandable language– the name and contact information of the Personal Information processor, the purposes and methods of processing, the categories and retention period of the Personal Information, the method and procedure for Data Subjects to exercise their rights under the PIPL, etc. – unless otherwise exempted by applicable data protection laws.

❖ Personal Information will be processed in line with the rights of Data Subjects under the PIPL.

Data Subjects should at least have the following rights:

- Right to know and decide the processing of their Personal Information;
- Right to access and copy their Personal Information held by Veolia China;
- Right to object to or restrict the processing of their Personal Information;
- Right to ask for the rectification of inaccurate Personal Information and the supplement of incomplete Personal Information;
- Right to ask for the deletion of the Personal Information in any of the following circumstances: (i) if the Data Subject discovers that Veolia China collects or uses their personal information in violation of the PRC laws or the agreements, (ii) the purpose of processing has been achieved, or it is impossible to achieve such purpose, or it is no longer necessary to achieve such purpose, (iii) Veolia China ceases to provide products or services for the Data Subject or the retention period has expired, (iv) the Data Subject concerned withdraws his/her consent, or (v) otherwise provided by laws and administrative regulations;
- Right to request Veolia China to transfer their Personal Information to another Personal Information processor designated by the Data Subject;
- Right to request Veolia China to explain its rules for processing Personal Information;
- Right to file a complaint to competent authorities or courts if the processing activities infringe the Personal Information rights and interests; and
- Other rights as provided by applicable data protection laws.

❖ Processing of Sensitive Personal Information

Veolia China will process Sensitive Personal Information only for a specific purpose and with sufficient necessity, and take strict protection measures. Employees will make increased efforts to protect such Sensitive Personal Information and ensure that such

Sensitive Personal Information is not disclosed or misused. When Sensitive Personal Information is being processed, the following specific conditions are required:

- Legal basis: A separate consent of the Data Subject or another applicable legal basis must be secured. If separate consent is applicable, it should be secured according to the template set forth in Appendix 7;
- Data subjects shall be additionally informed of the necessity of processing Sensitive Personal Information and the impacts on personal rights and interests, unless otherwise exempted by applicable data protection laws;
- To process the Personal Information of a minor under the age of 14, Veolia China shall obtain the consent of the minor’s parents or other guardians and formulate specialized rules for processing such Personal Information.
- Veolia China shall conduct the impact assessment on **personal information protection** (“PIA”) in accordance with **Appendix 8**.

**PRACTICAL RECOMMENDATIONS**, considering the above requirements,

- ❖ **Notice and Consent Letter for Processing Employee Personal Data.** This is requested to circulate the **Notice and Consent Letter for Processing Employee Personal Data** (enclosed in **Appendix 2**) to employees, and obtain employees’ consent to this Notice (e.g., signed version from the employees).
  1. For the existing employees, this is advised to send the notice via email and collect employee’s electronic confirmation; and
  2. For newly joined employees, this Notice will be included in the on-boarding documents for signature.
- ❖ **Record of Processing.** Veolia China should create and keep a record of processing of Personal Information. The record should include the purposes and methods of processing, the categories of Personal Information, the retention period, the provision and transfer of Personal Information to other data recipients (including Veolia entities and unaffiliated third parties, onshore or offshore, if any).

### **3. Sharing & Transferring of Personal Information**

Data sharing means that one legal entity provides data to any organizations (including Veolia China affiliates and unaffiliated third parties) or individuals other than this legal entity itself and its employees. If data sharing involves cross-border data transfer outside of China, please also refer to the following section “**4. Cross-border Transfer of Personal Information**”.

A data sharing contract must be properly signed which includes the purpose, retention period, method of processing, the type of Personal Information, protection measures, as well as the rights and obligations of both parties, etc

Personal Information sharing and transferring to third parties:

- Before sharing and transferring to third parties, Veolia China will conduct a **PIA** in accordance with **Appendix 8**;
- Personal Information must not be transferred to third parties without a separate consent from the Data Subject (See **Appendix 7 for a template of separate consent letter**) or another applicable legal basis, and an agreement between Veolia China and the third party.
- Where Veolia China provides Personal Information to third parties, the Data Subject shall be informed of the recipient's name, contact information, processing purposes, processing method and the type of Personal Information involved.
- Accessing, sharing, and disclosing records or files containing Personal Information must be limited to those persons who are reasonably required to know such information in order to accomplish Veolia China's business purposes or to enable Veolia China to comply with legal requirements. When designing a database, it should be ensured that sensible user access controls are in place in order that users may only access Personal Information where this is necessary for their roles.

Personal Information sharing and transfer to Veolia China:

- When Personal Information is shared or transferred by a third party to Veolia China, the employee responsible shall ensure that the third party has committed in writing that it has secured proper separate consent from the Data Subject or another applicable legal basis and have informed the Data Subject of Veolia China's name, contact information, processing purposes, processing method and the type of Personal Information involved.
- Veolia China will make reasonable efforts to verify the lawfulness of data source from the third party.
- Veolia China, as a data recipient, shall obtain the separate consent of the Data Subject anew in case of changes in the agreed original purpose and method of processing. See Appendix 7 for a template separate consent letter.

#### **4. Cross-border Transfer of Personal Information**

Cross-border Transfer includes the following situations:

- (1) the Personal Information processor transfers or stores the data collected and generated during its operation within the PRC to or in somewhere outside the PRC;
- (2) the Personal Information processor stores within the PRC the data it collects and generates but allows any overseas entity, organization or individual to access, inquire, retrieve, download or export such data; or
- (3) other activities as prescribed by the Cyberspace Administration of China ("CAC").

Practical examples include but are not limited to the following scenarios:

- Veolia China directly shares with or transfers Personal Information to institutions, organizations or individuals outside the territory of the PRC through the network or through other means (such as physical transfer);
- Veolia China makes Personal Information collected or generated within the territory of the PRC available (e.g. visit, read, remote access) to a third party located outside the territory of the PRC; or
- Veolia China stores Personal Information collected or generated within the territory of the PRC via a cloud with server located outside the territory of the PRC.

The following conditions must all be satisfied before the Cross-border Transfer of Personal Information:

- Veolia China should inform Data Subject in advance of the name and contact information of data recipient, the purpose and method of processing, the type of Personal Information involved, and the method and procedure for Data Subject to exercise the rights under the PIPL. A separate consent of the Data Subject (see **Appendix 7** for a template) or another applicable legal basis (if applicable) shall be obtained.
- Veolia China should conduct a PIA in accordance with **Appendix 3** (if Security Assessment is not applicable) or **Appendix 9** (if Security Assessment is applicable) prior to the Cross-border Transfer.
- Veolia China should satisfy one of the following lawful mechanisms:
  - (1) apply for the security assessment on Cross-border Transfer (“Security Assessment”), and obtain the CAC’s approval for such transfer;
    - the CAC Security Assessment is mandatory in any of the following circumstances – if a Veolia China entity (as data provider):
      - a) is deemed as a CII operator;
      - b) processes the Personal Information of more than one million individuals;
      - c) has provided abroad the Personal Information of 100,000 individuals or the Sensitive Personal Information of 10,000 individuals in total since January 1 of the previous year; or
      - d) otherwise stipulated by the CAC.
  - (2) conclude a contract with the overseas data recipient in accordance with the standard contract formulated by the CAC;
  - (3) obtain a certification by a specialized agency for Personal Information protection; or
  - (4) otherwise provided by laws and administrative regulations or other conditions stipulated by the CAC.
- If any data (including but not limited to Personal Information will be provided to any overseas judicial or law enforcement authorities, then in addition to the above process, the approval of PRC competent authorities is also required.



- If Veolia China is notified by competent authorities as operating CII, then Veolia China is required to store within the China the personal information collected and generated within China.

**PRACTICAL RECOMMENDATIONS**, in light of the above requirements,

- ❖ It is recommended to store the Personal Information collected and generated within PRC. Personal Information stored electronically will be processed and stored through a platform hosted by a server/web server located in PRC. This is to be handled in close liaison with the IS/IT and Security Department.
- ❖ In case of Cross-border Transfer of data that is potentially Personal Information, the process will be:
  1. Business/Operation to request for Cross-border Transfer, and describe the category, content and scope of the data involved, and the business necessity for such transfer;
  2. China DPM to conduct a brief review on whether the data involved may qualify as Personal Information, and check whether it is necessary to transfer such data abroad; and, if there is necessary Cross-border Transfer of Personal Information, then:
  3. If Security Assessment is **not triggered**, China DPM will ask Business/Operation to fill in the PIA form in **Appendix 3**; or if Security Assessment is **triggered**, China DPM will ask Business/Operation to fill in the Risk Self-Assessment Report on Cross-border Data Transfer (“Report”, enclosed in **Appendix 9**);
  4. China DPM (with the support of the Legal/Compliance Department) will assess the potential risks and fill in the legal/compliance-related parts of the said PIA form or Report;
  5. China DPM (with the support of the Legal/Compliance Department) will negotiate a legally-binding instrument (such as an agreement) to be entered into with the overseas recipient to ensure the obligations and liabilities on data security and protection;
  6. China DPM will duly inform the Data Subjects involved in a proper way, and obtain their separate consent or satisfy another legal basis (if applicable);
  7. If Security Assessment is **triggered**, China DPM will prepare other required materials, and submit an application to the CAC for the Security Assessment. The approval of the CAC is required before any Cross-border Transfer of Personal Information;
  8. If any data (including but not limited to Personal Information) will be provided to any overseas judicial or law enforcement authorities, then in addition to the above process, the approval of PRC competent authorities is also required.

## 5. Retention & Archive

❖ Personal Information must be accurate and, where necessary, kept up to date

If an Employee becomes aware that the organisation holds any inaccurate, irrelevant or out-of-date Personal Information, he/she shall notify the China DPM and provide any necessary corrections and/or updates to the information. Inaccurate or out-of-date data will be destroyed.

❖ Personal Information shall not be kept longer than necessary for the collection and processing purposes

Personal Information will be destroyed or erased from Veolia China's IT systems once the purpose specified and consented to by the Data Subject has been realized, unless there is a proper reason to extend the retention period or it is protected under the law.

Paper documents containing Personal Information will be stored in a locked or otherwise secured desk, filing cabinet, office, or controlled area when unattended. Personal Information stored electronically on laptops or other portable devices will be protected via access controls and stored in accordance with the relevant internal policies.

## 6. Personal Information Protection Impact Assessment ("PIA")

Under the following circumstances, PIA shall be conducted in accordance with **Appendix 8** (if transferring cross-border, refer to "**4. Cross-border Transferring of Personal Information**"):

- (1) processing Sensitive Personal Information;
- (2) making use of Personal Information to make automated decision-making;
- (3) entrusting others to process Personal Information;
- (4) providing other Personal Information processors with Personal Information (e.g., providing the Personal Information of employees to a third party for social insurance and payroll related purposes);
- (5) publicizing Personal Information;
- (6) providing Personal Information to overseas parties; and
- (7) other processing activities of Personal Information that has significant impacts on personal rights and interests.

PIA shall include the following contents:

- (1) whether the purposes and methods of processing personal information are lawful, legitimate and necessary;
- (2) the impacts on personal rights and interests and the security risks; and
- (3) whether the protection measures taken are lawful, effective and appropriate to the degree of risks.

The PIA report and the records of relevant processing shall be kept for at least three years.

In case of any risks identified during the Personal Information Protection Impact Assessment, remedial actions shall be made and taken by the Personal Information processor, which shall be further monitored by the Data protection manager or the General Manager of the entity.

After passing the PIA, the processing of personal information shall be carried out in accordance with the facts and measures stated in the PIA. If the processing of personal information, the above-mentioned contents of PIA, and/or the relevant laws and regulations applicable to the PIA change, then the PIA shall be re-conducted.

## **7. Security & Alert**

### **❖ Security measures**

Veolia China shall ensure that appropriate technical and organisational measures are taken against unlawful or unauthorised processing of Personal Information to prevent it from being distorted or damaged and to prevent unauthorised access by third parties.

- Veolia China shall implement local procedures and technologies to maintain the security of all retained Personal Information, which means maintaining their confidentiality, integrity, traceability and availability, as defined below:
  - Confidentiality means that only authorised people will access the Personal Information.
  - Integrity means that Personal Information will be accurate, relevant and necessary.
  - Traceability means the ability to identify and track any user action history to access, modify or destroy the Personal Information.
  - Availability means that authorised users will be able to access the Personal Information if they need it for authorised purposes.
  
- Security rules include notably:
  - Access controls. Any stranger seen in access-controlled areas without appropriate identification will be reported.
  - Secure lockable desks and cupboards. Desks and cupboards will be kept locked if they hold Personal Information.
  - Methods of paper disposal. Confidential paper documents will be disposed of securely.
  - Shredder or any system able to destroy the confidential documents.
  
- In line with the IT Systems security group policy:
  - Access to electronic Personal Information will be protected by passwords or any other appropriate security measures.
  - Personal information users shall ensure that individual monitors do not show

Personal Information to passers-by and that they lock their computer when it is left unattended.

- Veolia China shall fulfil the obligations of security protection according to the requirements of the classified protection system for cyber security to ensure that the network is free from interference, damage or unauthorized access, and prevent network data from being divulged, stolen or falsified.

❖ Security Incident Response

Any security incident on Personal Information, including where the Personal Information has been or may be divulged, tampered with or lost must be immediately reported to the China DPM and the Security Department, and also reported to the relevant authorities and individuals if so required by applicable data protection laws.

The report shall include the type of Personal Information involved, the cause and potential damages, the remedial measures taken by Veolia China, measures that the Data Subject may take to mitigate the damages, and contact information of Veolia China.

Veolia China shall create and maintain a tool for recording and monitoring alerts in the event of exposure or breaches of personal information protection.

**ADDITIONAL SPECIFIC RECOMMENDATIONS**

❖ Notice on Website and Platform in PRC

It is requested to insert the **Privacy Notice** (enclosed in **Appendix 4**) and **Cookies Policy** (enclosed in **Appendix 5**) with provided cookies options on the login page of the websites or any platforms where Veolia China collects data from third parties (customers, etc.)

❖ Contract involving Personal Information

It is requested to insert the recommended clauses (enclosed in **Appendix 6**) in the contracts.

**8. Personal Information Protection Training**

Veolia China will organize Personal Information protection security education and training as it deems appropriate to help its employees to understand the significance of Personal Information protection and the legal and regulatory requirements of Personal Information processing. The training shall be organized by Compliance Department, and if necessary, external specialized data experts will be introduced. The China DPM and the General Manager of each entity in China shall attend the training and they may designate other specific employee(s) to attend the trainings.

**Appendix 1**  
**Veolia China**  
**Definition and Notes**

Please refer to the below definitions and examples of the important terms when you filling in the Assessment Forms.

- **“Personal Information / Personal Data”** refers to any kind of information, in electronic form or other forms, that is related to identified or identifiable natural persons (**“Data Subjects”**), including but not limited to name, birth date, identification number, correspondence address, telephone number, email address, residential address, account information, credit information, biometric information, health information, financial information, and location data.

An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, psychological, biometric, economic, cultural or social identity of that natural person.

**Note:** fully anonymized data is not Personal Information as long as such data is unable to identify any Data Subject and such anonymization cannot be recovered. **“Being anonymized”** or **“anonymization”** refers to the process in which Personal Information is processed so that it is impossible to identify a natural person and it cannot be recovered.

By Contrast, **“de-identification”** refers to the process in which Personal Information is processed so that it cannot identify certain natural persons without the aid of additional information. However, de-identified information still belongs to Personal Information since the data subject is still identifiable with the combination of other information.

- **“Critical Information Infrastructure(CII)”** refer to the important network facilities and information systems in important industries and fields such as public telecommunications, information services, energy, transportation, water conservancy, finance, public services, e-government and national defense science, technology and industry, as well as other important network facilities and information systems which, in case of destruction, loss of function or leak of data, may result in serious damage to national security, the national economy and the people's livelihood and public interests, subject to the identification of the relevant authorities according to the identification rules of CII.

**Examples of Personal Information (including Sensitive Personal Information)**

<b>Category</b>	<b>Example</b>
Personal identification information	Name, date of birth, gender, nationality, ethnic group, residential address, telephone number, email, etc.
National IDs and identifier	ID card, military officer certificate, passport, Hong Kong and Macao pass, driver license, workpermit, access card, social security card, residential card, etc.
Personal biometric ID data	Genetic data, fingerprint, voice fingerprint, palm print, auricle shape, iris scan, facial features, etc.
Network identification data	System account number, IP address, email address and log in details, token, token protection answer, user digital certificate, etc.
Personal health, medical care data	Medical record in relation to illness and diagnostics and treatment, e.g., illness, hospitalization, prescription, test report, surgery and anesthesia record, nursing record, dosage, drug and food allergy information, birth information, medical history, diagnosis and treatment plan, family disease history, present illness, history of previous infectious disease, as well as information in relation to personal wellbeing and weight, height, lung, etc.
Education and professional data	Employment details, job title, employer, education, qualification, degree, diploma, career, training record, transcript, etc.
Economic and financial information	Bank account number, authentication information (token), account balance (including amount of funds, record of payment and receipt, etc.), property information, credit history, credit information, transaction and consumption record, water bill, as well as virtual property information, e.g. virtual currency, in-app purchase, game Cd Key, etc.
Communication and correspondence	Correspondence and content, SMS, MMS, email, wechat message, and data describing personal communication (usually called metadata), etc.
Contact information	Contact, friend list, group list, email list, etc.
Browsing history	Tracking usage data of user stored by logging, including website browsing history, history of use of software, clicking history, etc.
Device identifier	Data describing the basic information of personal device, e.g. serial number of a hardware, device MAC address, software list, Unique Device Identifier (IMEI/android ID/IDFA/OPENUDID/GUID, IMSI information in SIM card), etc.
Location data	Location data, history of hotels check-in, latitude and longitude, and data that is able to precisely pinpoint a Data Subject, etc.
Other data	Marital history, religion, sexual orientation, unpublished criminal record, etc.

- **“Sensitive Personal Information”** refers to the personal information that, once leaked or illegally used, is likely to result in damage to the personal dignity of the Data Subjects or damage to his or her personal or property safety, including biometric identification, religious belief, specific identity, medical health, financial account, whereabouts and tracks, the personal information of minors under the age of 14, etc.

**Examples of Sensitive Personal Information**

<b>Category</b>	<b>Example</b>
Economic and financial information	Bank account number, authentication information (token), account balance (including amount of funds, record of payment and receipt, etc.), property information, loan history, credit information, transaction and consumption record, transaction history, as well as virtual property information, e.g., virtual currency, in-app purchase, game Cd Key.
Personal health and medical caredata	Medical record in relation to illness and diagnostics and treatment, e.g., illness, hospitalization, prescription, test report, surgery and anesthesia record, nursing record, dosage, drug and food allergy information, birth information, medical history, diagnosis and treatment plan, family disease history, present illness, history of previous infectious disease, as well as information in relation to personal wellbeing.
Biometric data	Genetic data, fingerprint, voice fingerprint, palm print, auricle shape, irisscan, facial features, etc.
National IDs and identifier	ID card, military officer certificate, passport, driver license, work permit, social security card, residential card, etc.
Network identification data	System account number, token, token protection answer, user personal digital certificate, etc.
Other data	sexual orientation, marital history, religion, unpublished criminal record, communication record and content, contact list, friends list, group list, location, website browsing history, history of hotels check-in and data that is able to precisely pinpoint a Data Subject, etc.

- **“Processing”** means collection, storage, use, processing, transmission, provision, disclosure and deletion, etc. of personal information.
- **“Cross-border Transfer”** includes the following situations:
  - (1) the Personal Information processor transfers or stores any data collected and generated in its operation within the territory of PRC to or in an overseas recipient;
  - (2) the Personal Information processor stores within the territory of PRC any data it collects and generates but allows any overseas entity, organization or individual to inquire, retrieve, download or export such data; **or**
  - (3) other behaviors of outbound data transfer prescribed by the Cyberspace

Administration of China (“CAC”).

Cross-border Transfer can be a one-off activity, such as copying Personal Information in the thumb drive and courier to an international organization, or a continuing activity, such as granting remote access to an information system that is used and hosted in China to a legal entity outside China. It is not a Cross-border Transfer if Personal Information that is collected outside China passes through or transit in China by way of routing through data center in China to a third country to the extent permitted by the applicable law.

- For the avoidance of doubt, the Data Subject includes minors who are below 14.



## Appendix 2

### Veolia China

#### Notice and Consent Letter for Processing Employee Personal Data

1. This **Notice and Consent Letter for Processing Employee Personal Data** (“**Consent Letter**”) is to inform the employees of Veolia Group in China (“**Employees**” or each an “**Employee**”) on how [company name of the Veolia entity] (“**Company**”) collects, stores, uses, processes, transmits, transfers, provides, discloses and deletes (collectively referred to as “**Process**”, “**Processed**” or “**Processing**”) Personal Data (as defined below) of Employees.
2. From time to time during the existence of the employment relationship between the Company and the Employee, the Company may, for the purposes of concluding and performing the employment contract and conducting human resources management in accordance with corporate policies, Process personal data (including **sensitive personal data** as highlighted in bold, collectively the “**Personal Data**”), collected from Employees:
  - a. General Personal Data includes but is not limited to an Employee’s name, political party, ethnic group, ID number, passport number (if applicable), mobile number, personal email address, date of birth, marital status, nationality, registered household (*Hu Kou*), social security details, record of qualification or disqualification (to the extent necessary for Employees to perform the duties under employment), working experience, educational qualifications, performance data, appraisal data, etc. Employee understands that the above data is necessary for the conclusion or performance of the employment contract to which he/she is a party, or for human resources management in accordance with the employee handbook formulated by the Company.
  - b. “Sensitive Personal Data” includes **biometrics** (such as **fingerprints, iris, hand shape, and other human biometrics**), **religious beliefs, specific identities, financial accounts, whereabouts, personal healthcare information like sick leave materials** submitted by the Employee in order to take sick leave (including **patient registration slips, medical records, diagnosis certificates/sick leave certificates, medical bills, etc.**), and/or any updates on such Personal Data provided by the Employee to the Company, etc.

Employee understands that the Company may need to Process Sensitive Personal Data which relates to the most private areas of the Employee or his/her life from time to time for his/her best interests, and if the Company intends to Process such data, it must obtain his/her separate consent, unless otherwise permitted by applicable laws of China. Therefore, the Employee hereby acknowledges and agrees that in order for the Company to effectively achieve the maximum purpose of Processing his/her Personal Data, so that he/she can enjoy the rights under the employment contract or under the Company’s rules and policies.

3. Employee understands and agrees that, to the extent permitted by applicable laws of China, the Company may Process Personal Data without the consent from the Employee in the following cases:
  - where it is necessary to conclude or perform a contract to which the individual concerned is a party;

- where it is necessary to implement human resources management in accordance with the lawfully formulated labor rules or the lawfully concluded collective contract;
  - where it is necessary to perform the statutory duties or statutory obligations;
  - where it is necessary to tackle public health emergencies or to protect natural persons' life, health or property;
  - process within a reasonable scope in accordance with the Personal Information Protection Law ("PIPL") the Personal Data that is published by the individual concerned or otherwise lawfully published;
  - process Personal Information within a reasonable scope in order to carry out news reporting and public opinions supervision for public interests; **or**
  - Otherwise provided by laws and administrative regulations.
4. Employee understands that, in addition to collecting the abovementioned Personal Data, the Company may collect and obtain his/her Personal Data through the following devices or systems, including but not limited to networks and communication equipment (*e.g.*, desktop computers, laptops, mobile phones, iPads, etc.) provided by the Company to the Employee for work purposes, video surveillance equipment installed by the Company at the workplace for security purposes, and access control system for the Employee's access to the Company's building or office floor.
5. Employee understands and agrees that the Company, its parent companies, subsidiaries and other affiliates within Veolia Group (located within or outside China) (collectively the "**Veolia Group**") have the right to, where necessary, reasonably Process inside or outside China the Personal Data of Employees, for one or more of the following purposes:
- a. Maintaining and keeping Employee's Personal Data and employment records to fulfill the requirements of relevant laws, regulations or audits;
  - b. Administering and/or managing Employee's employment, salary or benefits related matters, administering immigration related matters and/or employment pass, permit, or license to work matters;
  - c. Facilitating communication with Employee or his/her designated emergency contact in case of emergency;
  - d. Monitoring the Company's premises and property by surveillance cameras legally installed at explicitly identified locations in workplace (*e.g.*, in reception or critical areas of the premises);
  - e. Administering, monitoring, supervising and/or managing Employee's use of various devices, networks, Company email accounts and infrastructures (door access and security system);
  - f. Managing or terminating/expiring Employee's employment relationship and employment contract with the Company, including recruitment and training, employment benefits and

- payroll administration, performance review, personal and career development, or disciplinary actions;
- g. Investigating any alleged or actual violation of professional ethics or the Company's rules and policies or breach of the law during the performance of Employee's duties under his/her employment based on information obtained through various channels, including information reported by whistleblowers via the Group's reporting platforms and systems;
  - h. Carrying out due diligence or other monitoring, screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by the Company;
  - i. Responding to orders or requests from public and governmental or regulatory authorities, or judicial bodies;
  - j. Screening and dealing with conflict of interests;
  - k. Responding (if necessary), to requests for verification of letters of recommendation and background checks of any departed Employee from any organizations or institutions, including the Employee's prospective employers or their agents, provided that such request is not against the law or regulation, is reasonable, or is consistent with business/market practices;
  - l. Retaining the Personal Data for the purpose of compliance with the applicable laws and regulations; or
  - m. Other purposes relating to any of the above, or other purposes that are necessary for the furtherance of employment administration or management.

(collectively the "**Purposes**")

- 6. The Company will protect the Employee's Personal Data from any unauthorized Processing. Employees further acknowledge and agree that Employee's Personal Data may be transmitted (including transferred), disclosed or provided for any of the Purposes to the following parties (located in or outside China), subject to the law: affiliated companies or member companies of Veolia Group, governmental agencies, judicial authorities and/or industry associations, or to a third party appointed as an advisor or service provider, including without limitation to third party administrative payroll and IT services providers, insurance brokers, insurers, bankers, medical practitioners providing medical services to the Employees, any actual or potential purchaser of all or part of the business of the Company or, in the case of any merger, acquisition or public offering, the purchaser or subscriber for shares in the Company and their advisors. As for the specific names of the up-to-date data recipients, the Employees can contact the Human Resource Department for further information. For any cross-border transfer of Employees' Personal Data outside of China, the Company will comply with the applicable requirements under the PIPL, including obtaining Employees' separate consent to such cross-border transfer, unless otherwise permitted by applicable laws of China. Where the member company of the Veolia Group or any of the other parties mentioned above is located outside China, the Company will require such companies to protect Employee's Personal Data in

accordance with the applicable Personal Data protection laws of that country and ensure the level of protection for the Processed Personal Data is at least comparable to the Personal Data protection offered under applicable laws of China.

7. The Company's Human Resource Department is responsible for retaining the Personal Data submitted by Employees. The contact information of the person in charge of the Human Resource Department is as follows: **[Insert name and contact information.]**

All Personal Data will be retained for as long as necessary to achieve the Purpose of Processing.

Employees understand the importance of keeping their Personal Data updated in the record of the Company and undertake to inform the Human Resource Department in a timely manner after such Personal Data is updated. If any Employee fails to inform the Company in a timely manner, he/she shall bear the corresponding legal consequences.

8. Should any Employee intend to exercise any of the below rights (including after the cross-border transfer of Personal Data), he/she should notify the Human Resource Department in writing:
- a. Right to be informed of, and to request explanation of the rules of, the Company's processing of his/her Personal Data;
  - b. Right to decide, restrict or refuse the Company's Processing of his/her Personal Data;
  - c. Right to access or copy his/her Personal Data;
  - d. Right to request the Company to update, correct or supplement his/her Personal Data;
  - e. Right to request for transfer of his/her Personal Data to his/her designated data processor; or
  - f. Right to request deletion of his/her Personal Data, but only under limited circumstances as specified by the PIPL;
  - g. Right to file a complaint to competent authorities or courts if the processing activities infringe the Personal Data rights and interests
  - h. Any other statutory rights conferred under the laws of China.

Employees acknowledge that where it is permitted by the laws of China, if the Company is unable to satisfy Employee's request in relation to the above for justified reasons, it is entitled to refuse Employee's request in whole or in part.

9. If the Purpose or method of Processing Personal Data or the type of Personal Data to be Processed changes, the consent of the Employees concerned will be obtained again, unless otherwise permitted by applicable laws of China.

10. The Employee has the right to withdraw consent. However, the Employee declares and understands that if he/she, for personal reasons, refuses or is unable to provide Personal Data as reasonably requested by the Company, causing the Company to be unable to Process Personal Data, the Company may not be able to proceed to relevant human resource management for such Employees, including but not limited to Employee management, payment of salary and bonus, and provision of insurance and other benefits. If any adverse consequences are caused thereby, the Employee shall bear the corresponding responsibilities, which are irrelevant to the Company.

In addition, the withdrawal of an Employee's consent will not affect the validity of the Company's Personal Data Processing activities based on his/her consent prior to such withdrawal.

(Signature Page)

I hereby acknowledge and confirm that I have read and understood the contents of the above Consent Letter, and that I have voluntarily, knowingly and expressly given my consent and full authorization to the Company to collect, store, use, transmit, transfer, provide, disclose, delete or otherwise Process my Personal Data as set forth in the Consent Letter.

**In addition, by checking the box(es) below, I separately consent to the Company's following Processing as set forth in the Consent Letter:**

- Processing my Sensitive Personal Data**
- Providing my Personal Data to Veolia affiliates and other third parties within China**
- Transferring my Personal Data to Veolia affiliates and other third parties outside of China**

Name of Employee: [To be inserted]

(Block Letters)

Signature of Employee:

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Date:

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Appendix 3

Veolia China

Impact Assessment on Personal Information Protection (“PIA”) for Cross-border Transfer of Personal Information

**Company:** [please insert name of legal entity that would transfer Personal Information outside China] (“Veolia”)

Before filling information in the below table, please read the important notes and definition in the **Appendix 1: Definition and Notes**.

If you are not sure how to fill in “Response” to any of the questions, please contact [XXX] at [XXX].

Question	Response	Assessment / Feedbacks
<p><b>1. Description of business process that requires the Cross-border Transfer of Personal Information or the reason.</b></p> <p><i>Describe here the business process or the reason why the Cross-border Transfer of Personal Information is required. Please include a general description of the business process or the reason, the adverse consequence if the Personal Information cannot be transferred to the overseas entity or individual, whether this is a one-off transfer or a continuing transfer.</i></p>		
<p><b>2. Describe the method of the Cross-border Transfer</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Granting remote access to information systems in China in ordinary course of business</li> <li><input type="checkbox"/> Migration of database to a backup outside China in ordinary course of business</li> <li><input type="checkbox"/> Change of cloud services provider which results in the data backup being hosted outside China</li> </ul>	

	<ul style="list-style-type: none"> <li><input type="checkbox"/> Copy the data in portable storage and provide to the data receiving entity outside China</li> <li><input type="checkbox"/> Provision of documents and data at the request or order of foreign government or court by emailing or courier</li> <li><input type="checkbox"/> Other – please specify:</li> </ul>	
<p><b>3. Whether any previous assessment has been done for similar Cross-border Transfer of Personal Information? If yes, please provide a copy of the previous assessment report.</b></p>		
<p><b>4. Please provide details of the entity, organization, or institution that will receive the Personal Information and the country where the receiving entity is located.</b></p> <p><i>Please provide the identity of the receiving entity, including but not limited to the name, address and contact details of the receiving entity.</i></p> <p><i>Please also specify the background, business, scale, financial performance, reputation and cyber security capability in general about the receiving entity.</i></p> <p><i>Please indicate whether the receiving entity has previous records of infringement of any individual’s Personal Information or any data incidents.</i></p> <p><i>Please indicate whether the receiving entity is judicial or law enforcement authorities.</i></p>		
<p><b>5. Data Subjects whose Personal Information will be transferred outside China.</b></p> <p><i>Describe here the individuals whose Personal Information will be transferred outside China.</i></p> <p><i>Describe here if any individuals whose Personal Information will be transferred outside China are below the age of 14.</i></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Employees</li> <li><input type="checkbox"/> Customers / Prospective Customer</li> <li><input type="checkbox"/> Consumers</li> <li><input type="checkbox"/> Vendors (suppliers of products or services)</li> </ul>	



	<input type="checkbox"/> Others – please specify:	
<p><b>6. Separate Consent of the Data Subject to the Cross-border Transfer of his/her Personal Information</b></p> <p><i>Data Subject’s separate consent is a prerequisite for the Cross-border Transfer of Personal Information when consent is relied upon as the legal basis of processing. Please check how the Data Subject’s separate consent (if applicable) was obtained in the first place and how it was documented.</i></p>	<input type="checkbox"/> Yes, please specify how the separate consent was obtained and documented and provide the relevant document (if any) <input type="checkbox"/> No <input type="checkbox"/> Not applicable. Please specify the applicable legal basis: _____	
<p><b>7. Category of Personal Information that is proposed to be transferred or processed overseas.</b></p> <p><i>Explain here the types of Personal Information that is proposed to be transferred or processed overseas. Please select the correct category of Personal Information.</i></p> <p><i>Please refer to <b>Appendix 1: Definition and Notes</b> if you are not sure how to determine or categorize Personal Information.</i></p>	<input type="checkbox"/> Identification data (name, address (private and professional), telephone number, email address) <input type="checkbox"/> Electronic identification data (IP addresses, device identifier, cookies) <input type="checkbox"/> Financial characteristics (account number, credit/debit card details, earnings) <input type="checkbox"/> Personal characteristics (age, gender, civil status, date of birth, place of birth, nationality) <input type="checkbox"/> Lifestyle data (consumption of alcohol/tobacco), consumption of goods and services, information about travel, social contacts, etc.) <input type="checkbox"/> Psychological data (personality, character) <input type="checkbox"/> Leisure activities and interests (hobbies, sports, other interest) <input type="checkbox"/> Affiliates (charities, volunteering, clubs, but excluding political affiliations)	

	<ul style="list-style-type: none"> <li><input type="checkbox"/> Education and training (educational history, professional qualification and experience, professional organizations, publications)</li> <li><input type="checkbox"/> Profession and job (employment details, employer job title, recruitment details, career, attendance and discipline, occupational health, salary, company assets held, evaluation, training)</li> <li><input type="checkbox"/> Personal Device Identifier (serial number of a hardware, device MAC address, IMEI/android ID/IDFA/OPENUDID/GUID , IMSI information in SIM card)</li> </ul> <p><b>Please provide details / justification of your answer:</b></p>	
<p><b>8. Whether any sensitive personal information is involved in the Cross-border Transfer of Personal Information? If yes, please specify if the Cross-border Transfer of Personal Information is for a specific purpose and with sufficient necessity, if strict protection measures have been taken, if separate consent has been secured from the Data Subjects and if personal information protection impact assessment has been conducted.</b></p> <p><i>Explain here the types of Sensitive Personal Information that is proposed to be transferred or processed overseas. Please select the correct category of Sensitive Personal Information.</i></p> <p><i>Please refer to <b>Appendix 1: Definition and Notes</b> if you are not sure how to determine or</i></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Economic and financial information</li> <li><input type="checkbox"/> Present and future health status</li> <li><input type="checkbox"/> National IDs and identifier</li> <li><input type="checkbox"/> Network identification data</li> <li><input type="checkbox"/> Genetic information</li> <li><input type="checkbox"/> Biometric data</li> <li><input type="checkbox"/> Religious</li> <li><input type="checkbox"/> Philosophical and moral beliefs</li> <li><input type="checkbox"/> Political views</li> <li><input type="checkbox"/> Sexual preference or sex life</li> </ul>	

<p><i>categorize Sensitive Personal Information.</i></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Location data of Data Subject</li> <li><input type="checkbox"/> Household composition (marital status and details, spouse/partner details, number of children, household/family members)</li> <li><input type="checkbox"/> Personal contact and message (contact, friend list, email list, message, SMS, any data that reflects the personal correspondences)</li> <li><input type="checkbox"/> Online tracking usage data, website browsing history, history of use of software</li> <li><input type="checkbox"/> History of hotels check-in and data that is able to precisely pinpoint a Data Subject</li> <li><input type="checkbox"/> Unpublished criminal record</li> <li><input type="checkbox"/> Personal Information of minor who are below the age of 14</li> </ul>	
<p><b>9. Sources of the Personal Information to be transferred or processed overseas.</b></p> <p><i>Describe here the sources of the Personal Information that will be transferred or processed overseas. For example, whether the Personal Information has been collected from the Data Subjects themselves or whether it was supplied by third parties. If supplied by third parties, which third parties? Whether Veolia is allowed to transfer any Personal Information supplied by third parties abroad? Please provide the relevant documents (e.g. contract with such third parties) which prove that Veolia is authorized to do so.</i></p>		

<p><b>10. Number of Data Subjects whose Personal Information is proposed to be transferred or processed overseas.</b></p> <p><i>Please provide the number of the Data Subjects affected. If a remote access to an information system is concerned, please provide the number of the existing Data Subjects whose Personal Information is stored on such information system.</i></p>		
<p><b>11. Amount of the Personal Information /Sensitive Personal Information that is proposed to be transferred or processed overseas.</b></p> <p><i>Explain the volume of the Personal Information/Sensitive Personal Information provided abroad, or other information relevant to the amount of the Personal Information/Sensitive Information.</i></p>		
<p><b>12. The minimum category of Personal Information and/or Sensitive Personal Information that is required to be transferred overseas for the purpose of fulfilling the purpose or is required for the Processing that will take place overseas.</b></p> <p><i>Please indicate whether the Processing that will take place overseas or requires Cross-border Transfer of the Personal Information necessarily needs to collect and process all of the Personal Information identified above, or whether it could operate effectively by processing lesser Personal Information.</i></p>		
<p><b>13. How will the Personal Information be processed?</b></p> <p><i>Describe how the Personal Information will be processed, i.e. on what assets (hardware, software, networks), by whom (people/team/title), whether electronically or in paper form and how the Personal Information will be stored and transmitted.</i></p>		

<p><b>14. Who will assist with the data Processing?</b></p> <p><i>Describe here which parties will be involved in the data Processing, in particular identifying any third parties that may be engaged to conduct the data Processing (e.g. third-party vendors) that will take place overseas and the specific role(s) they will perform, Including any other group entities that may be involved in the Processing.</i></p>		
<p><b>15. Will the Personal Information be disclosed to anyone else in the country where the receiving entity is located? If yes, please provide the details about such third party, the categories of Personal Information to be disclosed and the retention period by such third party.</b></p> <p><i>Please explain whether the Personal Information collected and processed will be shared with any other person, company or organization other than the receiving entity. If yes, please explain whether the Data Subjects have been informed of the identity and nationality of the third party, purpose of the onward transfer, type of the personal information and retention period by the third party, and whether the Data Subjects' consent has been properly obtained for the onwardtransfer.</i></p>		
<p><b>16. Would the Personal Information be transferred by the receiving entity to another country (ies)? If yes, please provide the details about such third party, the categories of Personal Information to be disclosed and the retention period by such third party.</b></p> <p><i>Please explain whether the Personal Information collected and processed will be transferred again by the receiving entity to another country (ies).</i></p>		

<p><b>17. How would the receiving entity assist Veolia in facilitating the exercise of Data Subject's rights to control the use of their Personal Information?</b></p> <p><i>An indicative list of Data Subject's rights which could apply are the rights to:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>Right to know and decide the processing of Personal Information;</i></li> <li><input type="checkbox"/> <i>Right to access and copy Personal Information;</i></li> <li><input type="checkbox"/> <i>Right to object to or restrict the processing of Personal Information;</i></li> <li><input type="checkbox"/> <i>Right to ask for the rectification of inaccurate Personal Information and the supplement of incomplete Personal Information;</i></li> <li><input type="checkbox"/> <i>Right to request the deletion of the Personal Information;</i></li> <li><input type="checkbox"/> <i>Right to request transfer of Personal Information to another Personal Information processor;</i></li> <li><input type="checkbox"/> <i>Right to request explanation of rules for processing Personal Information;</i></li> <li><input type="checkbox"/> <i>Right to file a complaint to competent authorities or courts if the processing activities infringe the Personal Information rights and interests.</i></li> </ul>		
<p><b>18. For how long will Personal Information be Processed and stored overseas?</b></p> <p><i>Please explain for how long the Personal Information will be processed and stored outside of China.</i></p> <p><i>Please also describe how your department/business function proposes to request the receiving entity to delete the Personal Information when the Processing that will take place overseas is completed.</i></p>		

<p><b>19. Measures to monitor the Processing of Personal Information once it is transferred outside China.</b></p> <p><i>Please describe the measures to monitor the receiving entity on its protection of Personal Information that is transferred by Veolia, such as commitment to Veolia’s privacy audit, or having in place a data breach or cyber incident response plan.</i></p>		
<p><b>20. Is de-identification ( e . g . , pseudonymization, encryption, etc.) implemented in a manner proportionate to the sensitivity of the Personal Information and the nature and scope of the Processing?</b></p> <p><i>Please describe if any of the de-identification, pseudonymization, encryption or other security measures is implemented by Veolia before Cross-border Transfer of Personal Information.</i></p> <p><b>Note:</b> <i>“Pseudonymization” means the Processing of Personal Information in such a manner that the Personal Information can no longer be attributed to a specific Data Subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the Personal Information are not attributed to an identified or identifiable natural person.</i></p>		

<p><b>21. What organization measures, technical measures, contractual liabilities, and other protection measures that the receiving entity will take to protect the Personal Information?</b></p> <p><i>Please explain here what measures have been implemented by the receiving entity to protect the Personal Information. For these purposes, please explain technical security controls, organizational controls (e.g., policies, processes, escalation paths etc.), physical security controls (e.g., locked cabinets, secure server rooms), relevant obligations and liabilities under contracts, etc.</i></p>		
<p><b>22. Please specify the lawful mechanism for cross-border transfer of personal information:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Conclude a standard contract (issued by the CAC) with the overseas data recipient;</li> <li><input type="checkbox"/> Obtain a certification by a specialized agency for Personal Information protection.</li> </ul>		
<p><b>23. Whether any personal information protection impact assessment has been done for similar Cross-border Transfer of Personal Information? If yes, please provide a copy of the previous assessment report and ensure the impact assessment report will be kept for record for at least 3 years.</b></p>		
<p><b>24. Whether Veolia China has informed the Data Subject of the name of the overseas recipient, contact information, purpose and method of processing, type of personal information and the method and procedure for the Data Subject to exercise his/her rights against the overseas recipient ? If yes, please provide a copy of the notification.</b></p>		



<p><b>25. Is the country/region where the receiving entity is located generally considered as affording good protection of Personal Information at a level no less than the level of protection that Chinese laws would afford to the Personal Information? Will the Personal Information protection laws and policies of such country/region adversely affect the receiving party's fulfillment of its obligations and liabilities under the Standard Contract or other relevant legal documents between Veolia China and the receiving party?</b></p> <p><i>You may conduct internet search and provide result to complete such question. If the receiving entity is exempted from local data protection laws given the size of such receiving entity, please provide description accordingly.</i></p> <p><i>Please indicate whether the receiving entity is judicial or law enforcement authorities.</i></p>		
<p><b>26. Given the abovementioned scope of Personal Information and Processing activities, and the protection measures taken or to be taken, what is the risk of Personal Information being leaked, destroyed, tampered with, abused, etc., and the risk to the Data Subjects involved?</b></p>		
<p><b>27. Please provide other information if you think that is relevant for such assessment.</b></p>		
<p><b>Conclusion:</b></p>		
<p><b>Assessed by:</b></p>		

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## Appendix 4

### Veolia China

### Privacy Notice

Last updated: [\*]

[Full company name of Veolia] and its subsidiaries and affiliates in China (collectively “Veolia” or “we”) respect your right to privacy and protect your personal information. This Privacy Notice explains how we collect, share and use your personal information, and how you can exercise your data subject rights, when you use our website [www.veolia.cn](http://www.veolia.cn), visit our WeChat ([to insert the name of the WeChat account]) and/or Weibo public accounts ([to insert the name of the Weibo account]), or otherwise interact with us (together referred to as “Services”).

#### 1. What personal information does Veolia process and why?

We may process the following personal information from you, when you use our Services:

- Personal information that you provide to us voluntarily

If you contact us for any enquiries or for any other purposes via the contact information listed on our website or our social media accounts, or submit any enquiry to us via the “contact us” section in the website, we may collect your name, phone number, home address, your social media account, the email address, the postal address, and the company you work for and other information about you that you provide to us, so that we are able to understand and respond to your enquiries or any other requests.

- Personal information of minors

Our products and services are not targeted at minors, and we usually do not collect the personal information of minors. If you are minors under 18 but above 14, please read and consent to this Privacy Notice under the guidance of your parents or other guardians. If you find us collecting and processing (unintentionally) the personal information of minors under 14 without the consent of their parents or other guardians, please contact us as stated in “10. How to contact us” below and we will delete such information in a timely manner.

If we plan to collect and process the personal information of minors under 14 in certain scenarios, we will at that time fully notify, and obtain consent (unless another legal basis exists) from, the minors and their parents or guardians.

- Information that we collect automatically

When you visit our website, we may use cookies and similar technology to collect certain information about you automatically from you and the devices you use to improve the quality and relevance of our website to our visitors.

Specifically, the information we collect automatically may include your IP address, device type, unique device identification numbers (device ID), browser-type, general geographic location (e.g. country or city-level location), and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.

This information may be collected using cookies and similar tracking technology, as explained further under our “Cookies Policy”.

- **Sensitive personal information (highlighted in bold)**

**Sensitive personal information includes biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal information of minors under the age of 14, etc.**

We do not target your sensitive personal information. However, in case we do collect or process your sensitive personal information from time to time for purposes of providing Services to you, we will inform you of the necessity of processing your sensitive personal information and the impact on your personal rights and interests, except for the circumstances that may be exempted from informing the individual of such information in accordance with the law and obtain your separate consent (if applicable). We will process your sensitive personal information only for a specific purpose and sufficient necessity, and provided that strict protection measures have been taken.

**In general, we will process the personal information we collect from you as mentioned above only for the purposes of providing Services to you or others described in this Privacy Notice or for purposes that we explain to you at the time we are seeking for your separate consent.**

## 2. Under which circumstances can Veolia process your personal information?

We will only process your personal information under one of the following circumstances:

- (1) With your prior consent;
- (2) it is necessary for Veolia to conclude or preform a contract to which you are a party;
- (3) it is necessary for Veolia to perform the statutory duties or statutory obligations;
- (4) it is necessary for Veolia to respond to a public health emergency or to protect the life, health and property safety of any individual;
- (5) such acts as news reporting and supervision by public opinions are carried out for the public interest, and the processing of personal information is within a reasonable scope;
- (6) it is necessary to process the personal information disclosed by you or other personal information that has been legally disclosed within a reasonable scope in accordance with the laws; and
- (7) Other circumstances prescribed by laws and administrative regulations.

The processing of personal information should be subject to your consent in accordance with relevant laws, however, your consent is not required under the circumstances set forth in Items (2) to (7) of the preceding paragraph.

## 3. Whom does Veolia share your personal information with?

We may disclose your personal information to the following categories of third-party data recipients only under necessary circumstances:

- to our **group companies that will process your personal information for purpose of [insert purposes]** according to this Privacy Notice;
- to our **third party services providers and business partners** who provide products and/or services to us (for example, third parties that host the website or that are involved in managing the content or other matters of the website), or who otherwise process personal information for purposes that are described in this Privacy Notice. Unless for purposes of providing products and/or services to us or otherwise provided in

this Privacy Notice, our third-party services providers and business partners are not allowed to retain, use or disclose your personal information.

As we may from time to time choose and change different service providers and business partners, if you are interested to know further details of such third parties, please contact us as stated in “10. How to contact us?” below.

- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we are required to comply with any applicable law or regulation, enforcement orders or other compulsory obligations. We may conduct such disclosures with or without obtaining your consent, subject to the authorities’ approval;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to **any other person with your separate consent to the disclosure** for the purpose that we will inform you before disclosure.

#### 4. How does Veolia keep your personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

#### 5. How does Veolia store and how long does Veolia store your personal information?

We will store the personal information that we collect from you in accordance with applicable Chinese laws and regulations. Unless otherwise required by applicable laws and regulations, we will store your personal information for a period of time as below:

- (1) We will retain the personal information we collect from you where we have an ongoing legitimate reasons to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).
- (2) When we have no ongoing legitimate business need to process your personal information or the statutory retention period under Chinese laws and regulations expires, we will either delete or anonymize it.

In spite of the above, we will store your personal information for the minimum period necessary for achieving the purpose of processing.

We will delete your personal information under the following circumstances:

- (1) the purpose of processing has been achieved, or it is impossible to achieve such purpose, or it is no longer necessary to achieve such purpose;
- (2) Veolia ceases to provide Services for you, or the retention period has expired;
- (3) you withdraw your consent;
- (4) Veolia processes your personal information in violation of laws and regulations;
- (5) other circumstances stipulated by laws and administrative regulations.

If (i) the retention period as stipulated by laws and administrative regulations does not expire,

or (ii) the deletion of personal information is difficult to be realized technically, Veolia will stop the processing other than storage and necessary security protection measures.

## 6. Cross-border transfer of your personal information

For the purposes of this Privacy Notice (please refer to “3. Whom does Veolia share your personal information with?” for details), Veolia may transfer some of your personal information to our affiliates or third parties that may be located in other countries or regions outside China in accordance with the requirements and procedures under applicable Chinese laws and regulations.

We will require such data recipients to take appropriate measures to protect your personal information at a level that is equivalent to the personal protection afforded by Chinese laws and regulations, and to process your personal information pursuant to this Privacy Notice.

## 7. Your Rights

You are entitled to any statutory data subject rights provided under Chinese laws.

- **You have the right to know and make decisions on what type of and how your personal information will be processed, and the right to restrict or refuse other (including Veolia) to process your personal information.**
- **You also have the right to access, check and make a copy of your personal information stored or processed by Veolia.**
- **You can request Veolia to correct or supplement your personal information stored by us when you find your personal information processed by Veolia is not correct or complete.**
- **You also have the right to ask us to transfer your personal information we have collected and stored to other personal information processors.**
- **You can request Veolia to delete your personal information in the abovementioned circumstances (in section 5).**
- You may get more details on the content of your rights and how to exercise your rights as mentioned above by contacting us using the contact details provided in the section “How to contact us”, and request us to explain the rules for processing your personal information. We respond to all requests we receive from individuals in accordance with the required time period and other requirements under applicable data protection laws.
- You also have the **right to withdraw your consent** anytime. You understand that your withdrawal of your consent may affect your use of Services afterwards as the processing of some types of your personal information is essential for us to provide Services to you.
- You can **file a complaint to competent authorities or courts** if you believe our processing activities infringe your personal information rights and interests.

## 8. Updates of this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technology or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

## 9. Direct marketing and Links to other websites

You may receive marketing communications from us and you have the right to **opt-out of any marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us?” section below.

If you use our websites or mobile applications, there may be advertisements or hyperlinks linking to another website. If you click on any of these advertisements or hyperlinks, you will leave our websites or mobile applications for another location. At any other website or mobile application, the protection of your personal information is not our responsibility and you are advised to refer to the privacy policy of that other location (if any).

## 10. How to contact us?

If you have any questions or concerns about our use of your personal information or regarding this Privacy Notice, please contact us using the following details:

[Full company name of Veolia]

Company Address: [company address of the Veolia entity]

Contact: [contact information of the Veolia entity]

You may also reach out to our Data Protection Manager for Personal information for PRC (other than Hong Kong, Macau and Taiwan) (China DPM). The contact information of our China DPM are as follows:

Name: [\*]

Tel: [\*]

E-mail: [\*]

We will try to respond to your requests as soon as possible within 15 working days after verifying your identity. We may not respond to your request if it is ungrounded, unreasonable, malicious or illegal, or if we are otherwise permitted or required by relevant laws and regulations.

I have read and fully understood this Veolia China Privacy Notice, and hereby give my voluntary and specific consent for Veolia China to process my personal information in accordance with this Privacy Notice.

Among others, by checking the following box(es), I give my separate consent for Veolia China to the corresponding processing of my personal information in accordance with this Privacy Notice.

- The processing of my **sensitive personal information**.
- The **provision** of my personal information **to Veolia affiliates and third parties**.
- The **cross-border transfer** of my personal information outside of China.

<b>I Consent</b>
------------------

## Appendix 5

### Veolia China

### Cookies Policy

Last updated: [\*]

The aim of this Cookies Policy is to inform visitors of our website about the nature, function and use of cookies, and to assist them in their choice of computer settings. For more about how we collect and use your personal information and how you can exercise your statutory data subject rights please refer to our privacy notice [please add a link to the Veolia privacy notice].

#### What is a cookie?

Cookies are small files installed on the hard disk of an internet user's computer when he or she visits a website.

They are randomly allocated alphanumeric characters identifying a visitor so that the website manager can see whether that visitor has already browsed the website, and track the frequency of those visits and the visitor's preferences. Cookies can also keep you connected, remember your preferences and provide you with relevant local information. Cookies do not introduce viruses. Once allocated, they do not search the internet user's equipment for personal information.

#### How are cookies used?

Our website uses the following cookies that may collect and use personal information about you:

**Functional Cookies:** These cookies are necessary (like session identifiers) for the smooth and secure browsing of our website and the use of its main functionalities. Once disabled, some browsing functionalities of this website might be impaired.

**Analytic/performance cookies:** These cookies are used to enhance and analyze the performance of our website but are non-essential to its use. These cookies may collect information that is used either in aggregate form to help us understand how our website is being used, the effectiveness of our marketing campaigns, or to help us customize our website for you. Your rejection of these cookies will not affect the quality of the browsing experience.

**Shared or third party cookies:** These third party cookies allow you to share content from our website contain links for sharing on social networks. To find out more about third party cookies, you can consult the information given on the third parties' websites about the installation of their cookies and their rules on data protection; we remind you, however, that Veolia cannot interfere with such cookies in any way. Your rejection of these cookies will not affect the quality of the



browsingexperience.

### **Managing your cookies**

The visitor has various options when it comes to managing, accepting or rejecting cookies, and can express his or her choice at any time by using the following methods. Besides the cookies options we offered in this page, you may also block the necessary cookies by changing your browser settings. As the means by which you can refuse cookies through your web browser controls vary from browser to browser, you should visit your browser's help menu for more information. Please note that when you turn off the Cookies or turn on "Do-Not-Track" function on your browser, the Cookies would not continue to collect your personal information and accordingly certain features of the Website that were designed to give you a good experience in browsing our Website might be disabled.

You may also contact us to change your cookies settings via the contact information contained in our privacy notice [[please add a link to the Veolia privacy notice](#)].

**Appendix 6**  
**Veolia China**  
**Personal Information Protection Clauses**

Personal Information Protection Clauses

- 1.1. The Parties undertake to process all personal information collected, used or otherwise processed in connection with the products and services under this Agreement ("Personal Information") in accordance with the clauses of this Agreement and the applicable data protection laws and regulations in China. The providing Party has satisfied the statutory requirements on the provision of Personal Information to the receiving Party, including but not limited to obtaining proper separate consent from the data subject or another proper legal basis, and informing the data subject on the name and contact information of the recipient, the purpose and method of processing and the type of Personal Information.
- 1.2. The receiving party shall process the Personal Information only for the purpose of providing the products and services under this Agreement. [To specify the categories of personal information, and the purposes and manners of processing Personal Information.] The receiving party shall not use, transmit, share or otherwise process the Personal Information beyond the scope of this Agreement or for purposes other than those specified in this Agreement. If the receiving party intends to process Personal Information beyond the scope of this Agreement or for other purposes, it shall separately obtain the written consent of the subject of personal information ("Data Subject") and shall be solely responsible for such processing of Personal Information.
- 1.3. After the expiration of this Agreement, except for separately obtaining the written consent of the Data Subject in accordance with applicable data protection laws or otherwise permitted by relevant laws and regulations, the receiving party shall immediately stop processing the Personal Information and delete or anonymize the Personal Information on its own or upon request of the providing party.
- 1.4. Unless otherwise specified in this Agreement or authorized by the providing party in writing, and complying with the relevant requirements under applicable data protection laws, the receiving party shall not transmit, disclose or share Personal Information or other information to any third party.
- 1.5. For Personal Information processed in accordance with this Agreement, when any Data Subject submits a request for his/her right related to Personal Information to either party, or when it is needed to handle a Data Subject dispute resolution, or when any party faces the investigation or order from competent regulatory authority, law enforcement agency or court of law, as requested by such party, the other party shall provide reasonable cooperation.
- 1.6. Both Parties shall ensure that their employees, authorized subcontractors or other third parties employed for the purposes of this Agreement process Personal Information in accordance with this Agreement.

**Appendix 7**  
**Veolia China**  
**Template Separate Consent Letter**

This Separate Consent Letter is to secure separate consent from individuals (“**Data Subject**”) on how [company name of the Veolia entity] (hereinafter referred to as the “**Company**”) collects, uses, discloses, transfers, or otherwise processes the Data Subject’s personal information.

The Data Subject may exercise his/her rights according to the relevant Privacy Notice of Veolia China.

**Category of Data Subject:**

- Employee of [company name of the Veolia entity]
- Website user
- Consumer
- Other, please specify \_\_\_\_\_

**The processing activity to be consented:**

- To enable the Company to process sensitive personal information**

Please specify the categories of sensitive personal information: [     ]

Please specify the purpose and method of processing sensitive personal information: [     ]

Please specify whether and which strict protection measures have been taken: [     ]

Please specify why the processing of the Data Subject’s sensitive personal information is necessary: [     ]

Please specify the impact on the Data Subject’s personal rights and interests if his/her sensitive personal information is processed: [     ]

We will only retain the above sensitive personal information for the minimum period 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 data. We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We confirm that we have implemented the appropriate administrative and security safeguards and procedures in accordance with the applicable laws and regulations to prevent the unauthorized or unlawful processing of your sensitive personal information and the accidental loss or destruction of, or damage to, your sensitive personal information.

**To enable the company to transfer the Data Subject’s personal information to other Personal Information processors within China**

Please specify the name and contact information of the recipient: [     ]

Please specify the purpose and method of processing: [     ]

Please specify the type of personal information: [     ]

**To enable the Company to make public the personal information of the Data Subject**

Please specify the purpose and method of processing: [     ]

Please specify the type of personal information: [     ]

**To enable the company to carry out cross-border transfer of the Data Subject’s personal information**

Please specify name of the overseas recipient: [     ]

Please specify contact information of overseas recipient: [     ]

Please specify purpose and method of processing: [     ]

Please specify type of personal information: [     ]

The above is agreed and acknowledged by the Data Subject:

**Please Read the Following Carefully before Giving Your Consent by Signing.**

I hereby acknowledge that I have read and understand the content of the above separate consent letter and agree that the Company may process my Personal Information in accordance with this separate consent letter.

Signature of Data Subject

\_\_\_\_\_

Signature Date

\_\_\_\_\_

**Appendix 8**  
**Veolia China**  
**Impact Assessment on Personal Information Protection (“PIA”)**

No.: \_\_\_\_\_

Date: \_\_\_\_\_

Pursuant to the *Personal Information Protection Law* and other laws and regulations of China in relation to personal information protection, Veolia China has carried out a personal information protection impact assessment (“**Assessment**”) on personal information processing activities involved in the [Project Name] (“**Project**”), and has formulated and archived this Report accordingly.

**I. Factual Information of Personal Information Processing Activities**

1. Cause(s) for initiating the Assessment (please check the box): the Project involves

<input type="checkbox"/>	processing of sensitive personal information
<input type="checkbox"/>	automated decision-making by utilizing personal information
<input type="checkbox"/>	entrustment of personal information processing
<input type="checkbox"/>	sharing personal information with other processor(s)
<input type="checkbox"/>	public disclosure of personal information
<input type="checkbox"/>	cross-border transfer of personal information (then please refer to Appendix 3 or Appendix 9 for PIA)
<input type="checkbox"/>	other personal information processing activities that have material impacts on personal rights and interests (please specify): _____

2. Personal information involved in the Project (please fill out the form with separate rows for different scenarios)

Category of Personal Information (please asterisk (*) sensitive personal information)	Number of Individuals Involved	Source of Personal Information	Legal Basis for Processing

3. Business needs of the Project, and the purposes and manners of processing personal information (please specify)

<b>Business Needs of the Project and Corresponding Department</b>	
<b>Purposes of Processing Personal Information</b>	
<b>Manners of Processing Personal Information</b>	

4. Information of third parties involved in the Project (please fill out the form with separate rows for different third parties)

Third Party's Name	Third Party's Role and Function in Personal Information Processing	Third Party's Credentials, Reputation, Personal Information Protection Capabilities and Risks

5. Protection measures already taken or to be taken for the Project (please specify)

	Within Company	Data Subjects	Third Parties
<b>Managerial Measures</b>			
<b>Technical Measures</b>			
<b>Other Measures</b>			

**II. Compliance Assessment on Personal Information Processing**

1. Whether the purposes and manners of processing personal information involved in the Project is lawful, legitimate and necessary (please specify)

--

2. The impacts on personal rights and interests and the security risks brought by the Project (please specify)

--

3. Whether the protection measures adopted in the Project is lawful, effective, and appropriate to the risk level (please specify)

--

4. Compliance risks and compliance recommendations of the Project (please specify)

No.	Compliance Risks	Compliance Recommendations

5. Overall assessment conclusion for the Project (please check the box)

<input type="checkbox"/>	No material compliance risk is identified or the risk is low. This Project is approved, subject to the implementation of above compliance recommendations (if any).
<input type="checkbox"/>	Medium compliance risk is identified. The Project is recommended to re-submit to PIA after the implementation of above compliance recommendations.
<input type="checkbox"/>	Relatively high compliance risk is identified. This Project is not recommended to proceed.



**Appendix 9**  
**Veolia China**  
**Risk Self-Assessment Report on Cross-border Data Transfer**

## 数据出境风险自评估报告（模板）

# Risk Self-Assessment of Outbound Data Transfer (Template)

数据处理者名称： 【】

Name of the data processor:

（盖章）

(seal)

【】年【】月【】日

[DD/MM/YYYY]

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(四) 数据出境中和出境后遭到篡改、破坏、泄露、丢失、转移或者被非法获取、非法利用等的风险，个人信息权益维护的渠道是否通畅等	28
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(五) 与境外接收方拟订立的数据出境相关合同或者其他具有法律效力的文件等，是否充分约定了数据安全保护责任义务	29
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## 一、自评估工作简述

### I. Brief Description of Self-Assessment

#### (一) 自评估工作开展情况

#### A. Implementation of Self-Assessment

(自评估工作开展情况，包括起止时间、组织情况、实施过程、实施方式等内容。)

*(Information of the implementation of self-assessment, including the starting and ending dates, the organization, the implementation processes, the implementation methods, etc.)*

1. 起止时间 Starting and Ending Dates	
2. 组织情况 Organization	
3. 实施过程、实 施方式 Processes and Methods of Implementation	

## (二) 第三方机构参与自评估情况

### B. Participation of Third-Party Agencies in Self-Assessment

(第三方机构参与自评估, 须在自评估报告中说明第三方机构的基本情况及其参与评估的情况, 并在相关内容页上加盖第三方机构公章。)

*(If any third-party agency has participated in the self-assessment, then the basic information of such third-party agency and its participation in the self-assessment shall be clarified in this report, with the official seal of such third-party agency affixed on relevant page(s).)*

1. 是否有第三方参与评估  Whether any Third-Party Agency is Involved in the Self-Assessment	
2. 第三方机构的名称与基本情况  Name and Basic Information of the Third-Party Agency	【第三方机构名称与基本情况】 [Name and Basic Information of the Third-Party Institution]  【(公章)】 [(Official Seal)]
3. 第三方机构参与评估的情况  Participation of the Third-Party Agency in the Self-Assessment	

## 二、出境活动整体情况

### II. Overall Information of the Outbound Transfer Activities

(详细说明数据处理者基本情况、数据出境涉及的业务和信息系统、出境数据情况、数据处理者安全保障能力情况、境外接收方情况、法律文件约定情况等。)

*(A detailed description shall be given concerning the basic information of the data processor, the business and information systems involved in the outbound data transfer, the information about the data to be transferred abroad, the security protection capability of the data processor, the information of the overseas recipient, the agreements in legal documents, etc.)*

#### (一) 数据处理者基本情况

##### A. Basic Information of the Data Processor

##### 1. 组织或者个人基本信息

###### Basics of the Organization or Individual

单位名称 Name		单位性质 Nature	
单位注册地 Registered Location		办公所在地 Office Location	
有效期 Validity Period		邮政编码 Postal Code	
注册资金 Registered Capital		员工数量 Number of Employees	
主营业务			

Principal Business	
统一社会信用代码 Unified Social Credit Code	

## 2. 股权结构和实际控制人信息

### Equity Structure and Actual Controller

序号 No.	股东姓名/名称 Name of Shareholder	持股比例 Shareholding Percentage	股东性质 Nature of Shareholder
(1)			境内/境外 Domestic/Overseas 法人/自然人 Legal/Natural Person
(2)			

序号 No.	实际控制人姓名/名称 Name of Actual Controller	持股比例 Shareholding Percentage	控制方式 Controlling Method
(1)			

## 3. 组织架构信息

### Organizational Structure

【组织架构图】



[Organization Structure Chart]

#### 4. 数据安全管理机构信息

##### Data Security Management Department

数据安全负责人和管理机构信息 Information of the Person in Charge and the Management Department for Data Security	姓名 Name		职务/国籍 Position/Nationality	
	联系电话 Contact Number		电子邮箱 E-mail	
	证件类型 Type of ID Document		证件号码 ID Number	
	机构名称 Name of Department		机构人数 Number of Personnel in the Department	

#### 5. 整体业务与数据情况

##### Overall Information of Business and Data

整体业务情况 Overall Information of Business	主营业务 Principal Businesses			
整体数据情况 Overall Information of	数据类型 Data Types		敏感程度（如为个人信息） Sensitivity (If Personal)	

Data			Information is Involved)	
	涉及自然人数 量  Number of Natural Persons Involved		涉及重要数据 数量  Amount of Important Data Involved	

## 6. 境内外投资情况

### Domestic and Overseas Investment

序号 No.	境内/境外 Domestic/Overseas	被投资企业名称 Name of the Investee	注册资本 Registered Capital	持股比例 Shareholding Percentage
(1)				
(2)				

### (二) 数据出境涉及业务和信息系统情况

## B. Information of the Business and the Information Systems Involved in the Outbound Data Transfer

### 1. 数据出境涉及业务的基本情况

#### Basics of the Business Involved in the Outbound Data Transfer

序号 No.	数据出境业务描述 Description of the Business Involved in the Outbound Data Transfer	数据出境的目的 Purpose of Outbound Data Transfer	数据出境的方式 Manner of Outbound Data Transfer

序号 No.	数据出境业务描述 Description of the Business Involved in the Outbound Data Transfer	数据出境的目的 Purpose of Outbound Data Transfer	数据出境的方式 Manner of Outbound Data Transfer
(1)	【应与法律文件中涉及的业务名称一致】 [the name of the business shall be described in consistent with the description in the legal documents]	【如开展业务合作、技术研究、经营管理等】 [e.g., business cooperation, technological development, operation management, etc.]	【如公共互联网传输、专线传输等】 [e.g., transmission through public internet, dedicated line, etc.]
(2)			

## 2. 数据出境涉及业务的数据资产情况

### Data Assets Involved in the Outbound Data Transfer

【2.1. 不同的数据出境业务场景可分表描述，序号应当与二（二）1的序号一致】

[2.1. Different business scenarios of outbound data transfer may be described in separate tables, and the sequence shall be consistent with that under II. B. 1]

序号 No.	数据类型 Data Types	敏感程度 Sensitivity	涉及自然人/重要数据的数量 Number of Natural Persons/Amount of Important Data Involved	数据规模 Data Size	涉及行业/领域 Industry/Sector or Involved
(1)		【个人信息/敏感个人信息/重要数据】 [Personal Information/Sensitive Information/Important Data]		MB/GB/TB	

序号 No.	数据类型 Data Types	敏感程度 Sensitivity	涉及自然人/重要数据的数量 Number of Natural Persons/Amount of Important Data Involved	数据规模 Data Size	涉及行业/领域 Industry/Sector or Involved
		Personal Information/[Important Data]			
(2)					

### 3. 数据出境涉及业务的信息系统情况

#### Information Systems for the Business Involved in the Outbound Data Transfer

【3.1. 不同的数据出境业务场景可分表描述，序号应当与二（二）1的序号一致】

[3.1. Different business scenarios of outbound data transfer may be described in separate tables, and the sequence shall be consistent with that under II. B. 1]

序号 No.	信息系统名称 Name of the Information System	主要业务功能 Major Business Function	服务器所在位置 Location of Server	所涉数据类型 Data Type Involved
(1)			【国家】 [Country]	
(2)				

### 4. 数据出境涉及的数据中心（包含云服务）情况

#### Data Centers (Including Cloud Services) Involved in the Outbound Data Transfer

序号 No.	境内/境外 Domestic/Overseas	数据中心名称 Name of Data Center	部署方式 Deployment Method	服务器所在位置 Location of Server
(1)	【境内/境外】 [Domestic/Overseas]		【自建机房/公有云/私有云/...】 [Self-established machine room/public cloud/private cloud/...]	【国家】 [Country]
(2)				

## 5. 数据出境链路相关情况

### Data Links for the Outbound Data Transfer

数据出境的方式 Manner of Outbound Data Transfer	【如公共互联网传输、专线传输等】 [e.g., transmission through public internet, dedicated line, etc.]	
数据出境的链路 Data Link for Outbound Data Transfer	链路提供商 Data Link Provider	
	链路数量与带宽 Number and Bandwidth of Data Link	
	境内落地数据中心名称及机房物理位置 Name of Domestic Data Center and Physical	

	Location of Machine Room	
	境外落地数据中心名称及机房物理位置 Name of Overseas Data Center and Physical Location of Machine Room	
	IP地址 IP Address	

(三) 拟出境数据情况

**C. Information of the Data to be Transferred Abroad**

1. 说明数据出境及境外接收方处理数据的目的、范围、方式，及其合法性、正当性、必要性

**Please State the Purpose, Scope, Manner, and the Lawfulness, Legitimacy and Necessity of the Outbound Data Transfer and the Data Processing by the Overseas Recipient**

【1.1. 不同的数据出境业务场景可分表描述，序号应当与二（二）1的序号一致】

[1.1. Different business scenarios of outbound data transfer may be described in separate tables, and the sequence shall be consistent with that under II. B. 1]

序号 No.	目的、范围、方式 Purpose, Scope and Manner	合法性 Lawfulness	正当性 Legitimacy	必要性 Necessity
(1)				
(2)				

2. 说明出境数据的规模、范围、种类、敏感程度

**Please State the Scale, Scope, Type and Sensitivity of the Data to be Transferred Abroad**

【2.1. 不同的数据出境业务场景可分表描述，序号应当与二（二）1的序号一致】

[2.1. Different business scenarios of outbound data transfer may be described in separate tables, and the sequence shall be consistent with that under II. B. 1]

序号 No.	数据类型 Data Types	敏感程度 Sensitivity	涉及自然人/重要数据的数量 Number of Natural Persons/Amount of Important Data Involved	数据规模 Data Size
(1)		【个人信息/敏感个人信息/重要数据】 [Personal Information/Sensitive Personal Information/Important Data]		MB/GB/TB MB/GB/TB
(2)				

3. 拟出境数据在境内存储的系统平台、数据中心等情况，计划出境后存储的系统平台、数据中心等

**Please State the Information of the Domestic System Platform and Data Center Storing the Data to be Transferred Abroad, and the Planned System Platform and Data Center for Storage After the Data is Transferred Abroad**

序号 No.	数据出境业务场景 Business Scenarios of Outbound Data Transfer	境内/境外 Domestic/Overseas	系统平台名称 Name of System Platform	数据中心名称 Name of Data Center

序号 No.	数据出境业务场景 Business Scenarios of Outbound Data Transfer	境内/境外 Domestic/Overseas	系统平台名称 Name of System Platform	数据中心名称 Name of Data Center
(1)				
(2)				

#### 4. 数据出境后向境外其他接收方提供的情况（再转移）

##### Provision (Onward Transfer) of the Transferred Data to Other Overseas Recipients

【4.1. 不同的数据出境业务场景可分表描述，序号应当与二（二）1的序号一致】

[4.1. Different business scenarios of outbound data transfer may be described in separate tables, and the sequence shall be consistent with that under II. B. 1]

序号 No.	再转移的数据接收方 Recipient of the Onward Transfer	再转移的数据类型 Type of Data in Onward Transfer	再转移的处理目的与方式 Purpose and Manner of Onward Transfer
(1)			
(2)			

#### （四）数据处理者数据安全保障能力情况

##### D. Data Processor's Capability for Ensuring Data Security

1. 数据安全能力，包括管理组织体系和制度建设情况，全流程管理、分类分级、应急处置、风险评估、个人信息权益保护等制度及落实情况

**Data Security Management Capability, including the Construction of Management Organization System and Policies, and the Policies and Implementation of Whole-Process Management, Classification and Grading, Emergency Response, Risk Evaluation, and**



## Protection of Personal Information Rights and Interests

### 【数据安全能力的总结】

[Summary of Data Security Management Capability]

<p>管理组织体系 Management Organization System</p>	<p>(1) 数据安全负责人： Persons responsible for data security:</p> <p>(2) 数据安全管理机构： Data security management department:</p>
<p>制度建设与落实 Construction and Implementation of Relevant Regimes</p>	<p>(1) 全流程管理： Whole-process management:</p> <p>(2) 分类分级： Classification and grading:</p> <p>(3) 应急处置： Emergency response:</p> <p>(4) 风险评估： Risk evaluation:</p> <p>(5) 个人信息权益保护： Protection of personal information rights and interests:</p> <p>(6) 第三方管理： Third party management:</p>

2. 数据安全技术能力，包括数据收集、存储、使用、加工、传输、提供、公开、删除等全流程所采取的安全技术措施等

**Data Security Technical Capability, Including Technical Security Measures Adopted for the Whole Process of Data Collection, Storage, Use, Processing, Transmission, Provision, Publication, Deletion, etc.**

【数据安全技术能力的总结】

[Summary of Data Security Technical Capability]

序号 No.	处理环节 Processing Activities	安全技术措施 Technical Security Measures
(1)	收集 Collection	
(2)	存储 Storage	
(3)	使用/加工 Use/Process ing	
(4)	传输/提供 Transmissio n/Provision	
(5)	公开 Publication	
(6)	删除 Deletion	

3. 数据安全保障措施有效性证明，例如开展的数据安全风险评估、数据安全能力认证、数据安全检查测评、数据安全合规审计、网络安全等级保护测评等情况

**Certification of the Effectiveness of Data Security Measures, such as Data Security Risk Assessment, Data Security Capability Certification, Data Security Inspection and Assessment,**

**Data Security Compliance Audit, Cybersecurity Classified Protection Assessment, etc.**

序号 No.	证明名称 Name of Certification	证明机构 Certification Institution	证明时间 Time of Certification
(1)	【名称+证书编号（如有）】 [Name + Certification No. (if any)]		
(2)			

**4. 遵守数据和网络安全相关法律法规的情况**

**Compliance with Relevant Laws and Regulations for Data and Cybersecurity**

序号 No.	类型 Type	行政/司法机构 Administrative/Judicial Authorities	时间 Time	主要情况 Main Information
(1)	行政执法程序 Administrative enforcement	【无】 [None]	【无】 [None]	【（在近2年中，）本公司在数据与网络安全方面并未遭遇行政处罚、调查等情形】 [(Over the past two years,) the Company has not been subject to any administrative penalties, investigations or other enforcement with respect to data and cybersecurity]
(2)	司法程序 Judicial proceedings	【无】 [None]	【无】 [None]	【（在近2年中，）本公司在数据与网络安全方面并未遭遇司法程序】 [(Over the past two years,) the Company has not been subject to any judicial proceedings with respect to data and cybersecurity]

(五) 境外接收方情况

**E. Information of the Overseas Recipient**

1. 境外接收方基本情况

**Basics of the Overseas Recipient**

序号 No.	名称 Name	性质 Nature	主营业务 Principal Business	注册地/办公地 Registered/Office Location
(1)		<b>【关联公司/第三方供应商/执法机构/司法机构/...】</b> [Affiliates / Third-party vendors / Law enforcement authorities / Judicial authorities / ...]		
(2)				

2. 境外接收方处理数据的用途、方式等

**Purpose and Manner of Data Processing by the Overseas Recipient**

**【2.1.不同的数据接收方可分表表述，序号应当与二（五）1的序号一致】**

[2.1. The information about different data recipients may be described in separate tables, and the sequence shall be consistent with that under II. E. 1]

序号 No.	业务场景 Business Scenario	数据类型 Data Type	处理目的与方式 Purpose and Manner of Processing
(1)			
(2)			

### 3. 境外接收方的数据安全保障能力

#### Data Security Protection Capability of the Overseas Recipient

【3.1.不同的数据接收方可分表表述，序号应当与二（五）1的序号一致】

[3.1. The information about different data recipients may be described in separate tables, and the sequence shall be consistent with that under II. E. 1]

【数据安全保障能力的总结】

[Summary of data security protection capability]

序号 No.	类型 Type	具体描述 Description
(1)	<p>【组织/管理/技术/认证】</p> <p>[Organizational/Management/Technical Measures/Certification]</p>	<p>【组织/管理/技术措施的具体描述】</p> <p>[Detailed description of organization/management/technical measures]</p> <p>【认证的名称+证书编号（如有），认证机构、认证时间】</p> <p>[Name of certification + certificate number (if any), certification institution and time of certification]</p>
(2)		

### 4. 境外接收方所在国家或地区数据安全保护政策法规和网络安全环境情况

## The Policies and Regulations and the Cybersecurity Environment of the Country or Region Where the Overseas Recipient is Located

### 【4.1.不同的国家和地区可分表表述】

[4.1. The information about different countries and regions may be described in separate tables]

### 【整体情况的总结】

[Summary of overall information]

1. 立法情况 Legislation	
2. 执法和司法机构 Law Enforcement and Judicial Authorities	
3. 网络安全环境 Cybersecurity Environment	

## 5. 境外接收方处理数据的全流程过程描述

### Description of the Whole Process of Data Processing by the Overseas Recipient

### 【5.1.不同的数据接收方可分表表述，序号应当与二（五）1的序号一致】

[5.1. The information about different data recipients may be described in separate tables, and the sequence shall be consistent with that under II. E. 1]

序号 No.	业务场景 Business Scenario	数据类型 Data Type	处理过程描述 Description of Data Processing
(1)			
(2)			

(六) 法律文件约定数据安全保护责任义务的情况

**F. Liabilities and Obligations of Data Security Protection Agreed in Legal Documents**

【不同的数据接收方可分表表述，序号应当与二（五）1的序号一致】

[The information about different data recipients may be described in separate tables, and the sequence shall be consistent with that under II. E. 1]

【总结：已与境外接收方签署《【法律文件名称】》，全面约定数据安全保护责任义务。】

[Summary: The Company has entered into the [Name of the legal document] with the overseas recipient, which comprehensively agrees on the liabilities and obligations of data security protection.]

评估项 Item to be Assessed	法律文件的约定情况 Agreement in Legal Document
1. 数据出境的目的、方式和数据范围，境外接收方处理数据的用途、方式等  The purpose, manner and scope of outbound data transfer; the purpose and manner of data processing by the overseas recipient	已约定，详见《【法律文件名称】》第【】条（第【】页）【可酌情摘录重点内容】  Already agreed.  Please refer to Article [] (page []) of the [Name of legal documents] [excerpt of the key contents may be included]
2. 数据在境外保存地点、期限，以及达到保存期限、完成约定目的或者法律	

<p>文件终止后出境数据的处理措施</p> <p>The location and duration for the overseas storage of the data; the measures to process the data transferred abroad upon the expiry of the storage period, the achievement of the agreed purpose, or the termination of the legal document</p>	
<p>3. 对于境外接收方将出境数据再转移给其他组织、个人的约束性要求</p> <p>Restrictions on the overseas recipient's onward transfer of the data transferred abroad to other organizations or individuals</p>	
<p>4. 境外接收方在实际控制权或者经营范围发生实质性变化，或者所在国家、地区数据安全保护政策法规和网络安全环境发生变化以及发生其他不可抗力情形导致难以保障数据安全时，应当采取的安全措施</p> <p>Security measures to be taken by the overseas recipient in case of a material change to the actual control or business scope of the overseas recipient, or in case of a change to the data security protection policies or regulations or cybersecurity environment of the country or region where the overseas recipient is located, or in case of other force majeure events, which renders it difficult to ensure data security</p>	
<p>5. 违反法律文件约定的数据安全保护义务的补救措施、违约责任和争议解决方式</p> <p>Remedies, liabilities for breach of contract, and dispute resolutions for violating data security protection</p>	



obligations as agreed in the legal document	
<p>6. 出境数据遭到篡改、破坏、泄露、丢失、转移或者被非法获取、非法利用等风险时，妥善开展应急处置的要求和保障个人维护其个人信息权益的途径和方式</p> <p>Requirements on properly responding to a data security incident and ensuring the channels and methods for individuals to safeguard their personal information rights, when the data transferred abroad undergoes the risk to be tampered with, destroyed, leaked, lost, transferred, illegally obtained, illegally used, etc.</p>	

(七) 数据处理者认为需要说明的其他情况

**G. Other Information that the Data Processor Considers Necessary to be Explained**

【 (无) 】

[(None)]

### 三、拟出境活动的风险评估情况

#### III. Risk Assessment of the Planned Outbound Data Transfer Activities

(就下列事项逐项说明风险评估情况，重点说明评估发现的问题和风险隐患，以及相应采取的整改措施及整改效果。)

*(The risk assessment shall be described item by item as follows, with a focus on the identified issues and potential risks in the assessment, and the corresponding rectification measures taken and the rectification effects.)*

#### 【总结】

[Summary]

(一) 数据出境和境外接收方处理数据的目的、范围、方式等的合法性、正当性、必要性

#### A. The Lawfulness, Legitimacy and Necessity of the Purpose, Scope and Manner of the Outbound Data Transfer and the Data Processing by the Overseas Recipient

1. 事实情况概述  A Brief Description of Facts	【概述，可引至前文相应章节】  [Brief description, which may refer to relevant sections above]
2. 合规评估  Compliance Assessment	【如首次评估并未发现风险、无需整改，则一并说明该等情况，并作出类似“5. 整改后再评估”的最终结论】  [If no risk is identified in the initial assessment, and no rectification is required, then such situation shall be described, and a conclusion similar to “5. Re-Assessment after Rectification” shall be stated.]
3. 主要合规风险  Major Compliance Risks	

<p>4. 整改措施及效果</p> <p>Rectification Measures and Effects</p>	
<p>5. 整改后再评估</p> <p>Re-Assessment after Rectification</p>	<p>数据出境和境外接收方处理数据的目的、范围、方式等<b>依法具备</b>合法性、正当性、必要性，<b>风险整体可控，整改后并无遗留风险。</b></p> <p>The purpose, scope and manner of the outbound data transfer and the data processing by the overseas recipient are lawful, legitimate and necessary <b><u>in accordance with laws. The risk is overall under control, and no remaining risk after rectification is identified.</u></b></p>

(二) 出境数据的规模、范围、种类、敏感程度，数据出境可能对国家安全、公共利益、个人或者组织合法权益带来的风险

**B. The Scale, Scope, Type and Sensitivity of the Data Transferred Abroad, and the Risks to National Security, Public Interests, and the Legitimate Rights and Interests of Individuals or Organizations Arising out of the Outbound Data Transfer**

<p>1. 事实情况概述</p> <p>A Brief Description of Facts</p>	<p>【概述，可引至前文相应章节】</p> <p>[Brief description, which may refer to relevant sections above]</p>
<p>2. 合规评估</p> <p>Compliance Assessment</p>	<p>【如首次评估并未发现风险、无需整改，则一并说明该等情况，并作出类似“5. 整改后再评估”的最终结论】</p> <p>[If no risk is identified in the initial assessment, and no rectification is required, then such situation shall be described, and a conclusion similar to “5. Re-Assessment after Rectification” shall be stated.]</p>
<p>3. 主要合规风险</p> <p>Major Compliance</p>	

Risks	
4. 整改措施及效果  Rectification Measures and Effects	
5. 整改后再评估  Re-Assessment after Rectification	<p>综合考虑出境数据的规模、范围、种类、敏感程度，数据出境可能对国家安全、公共利益、个人或者组织合法权益带来的<u>风险整体可控，整改后无遗留风险。</u></p> <p>Taking into account the scale, scope, type, and sensitivity of the outbound data transfer, <b><u>the risk that may be brought by outbound data transfer to national security, public interests, and the legitimate rights and interests of individuals or organizations is overall under control, and no remaining risk after rectification is identified.</u></b></p>

(三) 境外接收方承诺承担的责任义务，以及履行责任义务的管理和技术措施、能力等能否保障出境数据的安全

**C. The Liabilities and Obligations Undertaken by the Overseas Recipient, and Whether the Management and Technical Measures and Capabilities of the Overseas Recipient for Such Undertakings can Ensure the Security of Data Transferred Abroad**

1. 事实情况概述  A Brief Description of Facts	<p><b>【概述，可引至前文相应章节】</b></p> <p>[Brief description, which may refer to relevant sections above]</p>
2. 合规评估  Compliance Assessment	<p><b>【如首次评估并未发现风险、无需整改，则一并说明该等情况，并作出类似“5. 整改后再评估”的最终结论】</b></p> <p>[If no risk is identified in the initial assessment, and no rectification is required, then such situation shall be described, and a conclusion similar to “5. Re-Assessment after Rectification” shall be stated.]</p>
3. 主要合规风	

<p>险</p> <p>Major Compliance Risks</p>	
<p>4. 整改措施及效果</p> <p>Rectification Measures and Effects</p>	
<p>5. 整改后再评估</p> <p>Re-Assessment after Rectification</p>	<p>综合考虑境外接收方承诺承担的责任义务、以及履行责任义务的管理和技术措施、能力等，境外接收方<u>可以保障</u>出境数据的安全，<u>风险整体可控，整改后无遗留风险</u>。</p> <p>Taking into account the liabilities and obligations undertaken by the overseas recipient, and the management and technical measures and capabilities of the overseas recipient for such undertakings, the overseas recipient <b>is able to ensure</b> the security of data transferred abroad. <b><u>The risk is overall under control, and no remaining risk after rectification is identified.</u></b></p>

(四) 数据出境中和出境后遭到篡改、破坏、泄露、丢失、转移或者被非法获取、非法利用等的风险，个人信息权益维护的渠道是否通畅等

**D. Risks of Data Being Tampered with, Destroyed, Leaked, Lost, Transferred, Illegally Obtained or Illegally Used During and After the Outbound Data Transfer, and Whether the Channel for Individuals to Exercise Their Personal Information Rights and Interests Is Smooth**

<p>1. 事实情况概述</p> <p>A Brief Description of Facts</p>	<p>【概述，可引至前文相应章节】</p> <p>[Brief description, which may refer to relevant sections above]</p>
<p>2. 合规评估</p> <p>Compliance Assessment</p>	<p>【如首次评估并未发现风险、无需整改，则一并说明该等情况，并作出类似“5. 整改后再评估”的最终结论】</p> <p>[If no risk is identified in the initial assessment, and no rectification is required, then such situation shall be described, and a conclusion similar to</p>

	“5. Re-Assessment after Rectification” shall be stated.]
3. 主要合规风险  Major Compliance Risks	
4. 整改措施及效果  Rectification Measures and Effects	
5. 整改后再评估  Re-Assessment after Rectification	<p>综合考虑出境数据、处理活动、境外接收方等方面的情况，数据出境中和出境后遭到篡改、破坏、泄露、丢失、转移或者被非法获取、非法利用等的<u>风险整体可控</u>，个人信息权益维护的渠道畅通，<u>整改后无遗留风险</u>。</p> <p>Taking into account the conditions of the data to be transferred abroad, the processing activities and the overseas recipient, <b><u>the risk of the data being tampered with, destroyed, leaked, lost, transferred, illegally obtained or illegally used during and after the outbound data transfer is overall under control</u></b>, the channel for individuals to exercise their personal information rights and interests is smooth, and <b><u>no remaining risk after rectification is identified</u></b>.</p>

(五) 与境外接收方拟订立的数据出境相关合同或者其他具有法律效力的文件等，是否充分约定了数据安全保护责任义务

**E. Whether the Liabilities and Obligations for Data Security Protection Has Been Fully Agreed upon in the Contract or Other Legally-Binding Documents related to Outbound Data Transfer to be Concluded with the Overseas Recipient**

1. 事实情况概述  A Brief Description of Facts	<p>【概述，可引至前文相应章节】</p> <p>[Brief description, which may refer to relevant sections above]</p>
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<p>2. 合规评估 Compliance Assessment</p>	<p>【如首次评估并未发现风险、无需整改，则一并说明该等情况，并作出类似“5. 整改后再评估”的最终结论】</p> <p>[If no risk is identified in the initial assessment, and no rectification is required, then such situation shall be described, and a conclusion similar to “5. Re-Assessment after Rectification” shall be stated.]</p>
<p>3. 主要合规风险 Major Compliance Risks</p>	
<p>4. 整改措施及效果 Rectification Measures and Effects</p>	
<p>5. 整改后再评估 Re-Assessment after Rectification</p>	<p>与境外接收方拟订立的【数据出境相关合同/其他具有法律效力的文件】充分约定了数据安全保护责任义务，<u>风险整体可控，整改后无遗留风险。</u></p> <p>[The relevant contract/other legally-binding documents related to outbound data transfer] to be entered into with the overseas recipient has fully specified the liabilities and obligations for data security protection, <b><u>the risk is overall under control, and no remaining risk after rectification is identified.</u></b></p>

(六) 其他可能影响数据出境安全的事项

**F. Other Matters That May Affect the Security of Outbound Data Transfer**

【(无)】

[(None)]

#### 四、出境活动风险自评估结论

#### **IV. Conclusion of the Risk Self-Assessment of Outbound Data Transfer Activities**

（综合上述风险评估情况和相应整改情况，对拟申报的数据出境活动作出客观的风险自评估结论，充分说明得出自评估结论的理由和论据。）

*(An objective risk self-assessment conclusion shall be made concerning the outbound data transfer activities to be filed on the basis of the abovementioned information and rectification. The reasons and arguments supporting the assessment conclusion shall be fully specified.)*

（完）

(The End)