

上海嘉和公益基金会数据信息隐私政策

Shanghai K Charitable Foundation Data Privacy Policy

引言 Introduction

1. 本网站的所有者是上海嘉和公益基金会（以下简称“嘉和基金会”或“我们”）。我们希望通过《上海嘉和公益基金会数据信息隐私政策》（“本隐私政策”）向您说明我们在您使用我们的服务时如何收集、使用、保存、共享和转让这些信息，以及我们为您提供的访问、更新、删除和保护这些信息的方式。

The owner of this website is Shanghai K Charitable Foundation (hereinafter referred to as "Foundation" or "we"). We hope to explain to you through the "Shanghai K Charitable Foundation Data Privacy Policy" ("This privacy policy") how we collect, use, save, share and transfer the information when you use our services, as well as the ways we provide to access, update, delete and protect the information.

2. 您使用或在我们更新本隐私政策后（我们会及时提示您更新的情况）继续使用我们的服务，即意味着您同意本隐私政策(含更新版本)内容，并且同意我们按照本隐私政策收集、使用、保存和共享您的相关信息。

When you use or continue to use our services after we update this privacy policy (We will promptly give you the status of update), it means that you agree to the contents of this privacy policy (including updated versions), and agree that we collect, use, save and share your relevant information in accordance with this privacy policy.

3. 嘉和基金会承诺将在能力范围内采取一切可行且适当的措施保护您的个人隐私。尽管没有任何系统或技术是绝对安全的，嘉和基金会仍将尽一切可能采取各种安全技术及程序收集、储存及保护用户信息，防止和防护安全入侵事件的发生以降低本网站个人信息外泄的风险。

The Foundation promises to take all feasible and appropriate measures to protect your personal privacy within the scope of its capabilities. Although no system or technology is absolutely safe, The Foundation will adopt various security technologies and procedures to collect, store and protect user information, to prevent the occurrence of security intrusion events, and to reduce risk of the leakage of personal information on this website.

一、 我们如何收集和使用您的个人信息 **How we collect and use your information.**

(一) 我们根据合法、正当、必要的原则，仅收集实现产品功能所必要的信息。

According to the principles of lawfulness, legitimacy and necessity, we only collect the information necessary to realize the function of the product.

1. 本隐私政策中涉及的个人信息包括：基本信息（包括个人姓名、生日、性别、住址、个人电话号码、电子邮箱）；个人身份信息（包括身份证、军官证、护照、驾驶证等）；面部特征；网络身份标识信息（包括系统账号、IP 地址、邮箱地址及与前述有关的密码、口令、口令保护答案）；个人体征测量结果信息（包括：血压、血糖、血脂、体温等信息）；通讯录；个人上网记录（包括网站浏览记录、软件使用记录、点击记录）；个人常用设备信息（包括硬件型号、设备 MAC 地址、操作系统类型、软件列表唯一设备识别码（如 IMEI/android ID/IDFA/OPENUDID/GUID、SIM 卡 IMSI 信息等在内的描述个人常用设备基本情况的信息）；个人位置信息（包括行程信息、精准定位信息、住宿信息、经纬度等）；个人健康。

The personal information involved in this privacy policy includes: **basic information (including personal name, birthday, gender, address, personal phone number, e-mail address);** **personal identification information (including ID card, military officer certificate, passport, driver's license, etc.);** **Facial features;** **network identity information (including system account number, IP address, email address, and related passwords, passwords, password-protected answers);** **personal sign measurement results**

information (including: blood pressure, blood sugar, blood lipids, body temperature and other information) ; Address book; personal Internet records (including website browsing records, software usage records, click records); personal common device information (including hardware model, device MAC address, operating system type, software list unique device identification code (such as IMEI / android ID / IDFA / OPENUDID / GUID, SIM card IMSI information and other information describing the basic situation of personal common equipment); personal location information (including itinerary information, precise positioning information, accommodation information, latitude and longitude, etc.); personal health.

2. 个人敏感信息是指一旦泄露、非法提供或滥用可能危害人身和财产安全，极易导致个人名誉、身心健康受到损害或歧视性待遇等的个人信息，本隐私政策中涉及的个人敏感信息包括：面部识别特征；个人身份信息（包括身份证、军官证、护照、驾驶证、户口本）；网络身份识别信息（包括账户名、账户昵称、邮箱地址及与前述有关的密码与密码保护问题和答案）；其他信息（包括通讯录、个人电话号码、手机号码、行程信息、网页浏览记录、住宿信息、精准定位信息）。

Personal sensitive information refers to personal information that once leaked, illegally provided or misused may endanger the safety of the person and property, easily lead to personal reputation, physical and mental health damage or discriminatory treatment. : Facial recognition features; personal identification information (including ID card, military card, passport, driver 's license, account book); network identification information (including account name, account nickname, email address, password and password protection issues related to the foregoing Answer); Other information (including address book, personal phone number, mobile phone number, itinerary information, web browsing history, accommodation information, precise location information).

- (二) 我们仅会出于以下目的，收集和使用您的个人信息：**We will only collect and use your personal information for the following purposes:**

1. 您须授权我们收集和使用您个人信息的情形 You must authorize us to collect and use your personal information

我们的服务包括一些核心功能，这些功能包含了改进我们的服务所必须的功能及保障交易安全所必须的功能。我们可能会收集、保存和使用下列与您有关的信息才能实现上述这些功能。如果您不提供相关信息，您将无法享受我们提供的服务。

Our services include some core functions, which include functions necessary to improve our services and functions necessary to ensure transaction security. We may collect, save and use the following information about you to achieve these functions. If you do not provide relevant information, you will not be able to enjoy the services we provide.

2. 您充分知晓，以下情形中，我们收集、使用个人信息无需征得您的授权同意：
You are fully aware that in the following circumstances, we do not need your authorization to collect and use personal information:

(1) 与国家安全、国防安全有关的；

Related to national security and national defense security;

(2) 与公共安全、公共卫生、重大公共利益有关的；

Related to public safety, public health, and major public interests;

(3) 与犯罪侦查、起诉、审判和判决执行等有关的；

Related to criminal investigation, prosecution, trial and execution of judgments, etc.;

(4) 出于维护个人信息主体或其他个人的生命、财产等重大合法权益但又很难得到本人同意的；

Out of the protection of major legal rights and interests of the personal information subject or other individuals' lives, property, etc., but it is difficult to obtain your consent;

- (5) 所收集的个人信息是个人信息主体自行向社会公众公开的；
The personal information collected is disclosed to the public by the subject of personal information;
- (6) 从合法公开披露的信息中收集的您的个人信息的，如合法的新闻报道、政府信息公开等渠道；
Your personal information collected from legally publicly disclosed information, such as legal news reports, government information disclosure and other channels;
- (7) 根据您的要求签订合同所必需的；
Necessary to sign a contract according to your requirements;
- (8) 用于维护所提供的服务的安全稳定运行所必需的，例如发现、处置服务的故障；
Necessary for maintaining the safe and stable operation of the services provided, such as finding and handling service failures;
- (9) 为合法的新闻报道所必需的；
Necessary for legal news reporting;
- (10) 学术研究机构基于公共利益开展统计或学术研究所必要，且对外提供学术研究或描述的结果时，对结果中所包含的个人信息进行去标识化处理的；
When it is necessary for academic research institutions to conduct statistics or academic research based on public interest, and to provide the results of academic research or descriptions externally, de-identify the personal information contained in the results;
- (11) 法律法规规定应当向特定主体公开的；
Where laws and regulations stipulate that it should be disclosed to specific subjects;

(12) 法律法规规定的其他情形。

Other circumstances stipulated by laws and regulations.

3. 我们从第三方获得您个人信息的情形 When we obtain your personal information from a third party

我们可能从第三方获取您授权共享的账户信息（头像、昵称），并在您同意本隐私政策后将您的第三方账户与您的嘉和基金会账户绑定，使您可以通过第三方账户直接登录并使用我们的服务。我们会将依据与第三方的约定、对个人信息来源的合法性进行确认后，在符合相关法律和法规规定的前提下，使用您的这些个人信息。

We may obtain account information (avatar, nickname) that you authorized to share from a third party, and bind your third-party account with your Shanghai K Charitable Foundation account after you agree to this privacy policy, so that you can directly use the third-party account Log in and use our services. We will use your personal information after confirming the legality of the source of personal information according to the agreement with a third party and in compliance with relevant laws and regulations.

4. 您个人信息使用的规则 Rules for the use of your personal information

(1) 我们会根据本隐私政策的约定并为实现我们的服务功能对所收集的个人信息进行使用。

We will use the collected personal information in accordance with the provisions of this privacy policy and to realize our service functions.

(2) 在收集您的个人信息后，我们将通过技术手段对数据进行去标识化处理，去标识化处理的信息将无法识别主体。请您了解并同意，在此情况下我们有权使用已经去标识化的信息；并在不透露您个人信息的前提下，我们有权对用户数据库进行分析。

After collecting your personal information, we will de-identify the data through technical means, and the de-identified information will not be able

to identify the subject. Please understand and agree that in this case, we have the right to use the information that has been de-identified; and we have the right to analyze the user database without disclosing your personal information.

- (3) 请您注意，您在使用我们的服务时所提供的所有个人信息，除非您删除或通过系统设置拒绝我们收集，否则将在您使用我们的服务期间持续授权我们使用。在您注销账号时，我们将停止使用并删除您的个人信息。

Please note that all personal information you provide when using our services will continue to authorize us during your use of our services unless you delete or refuse to collect them through system settings. When you cancel your account, we will stop using and delete your personal information.

- (4) 我们会对我们的服务使用情况进行统计，并可能会与公众或第三方共享这些统计信息，以展示我们的服务的整体使用趋势。但这些统计信息不包含您的任何身份识别信息。

We will make statistics on the usage of our services and may share these statistics with the public or third parties to show the overall trend of our services. However, these statistics do not contain any identification information about you.

- (5) 当我们展示您的个人信息时，我们会采用包括内容替换、匿名处理方式对您的信息进行脱敏，以保护您的信息安全。

When we display your personal information, we will desensitize your information by including content replacement and anonymous processing to protect your information security.

- (6) 当我们要将您的个人信息用于本政策未载明的其它用途时，或基于特定目的收集而来的信息用于其他目的时，会通过您主动做出勾选的形式事先征求您的同意。

When we want to use your personal information for other purposes not specified in this policy, or when the information collected based on a specific purpose is used for other purposes, we will ask for your consent in advance through asking you to check in the checkbox.

二、 我们如何共享、转让、公开披露您的个人信息 **How we share, transfer, and publicly disclose your personal information**

(一) 共享 **To Share Personal Information**

1. 我们不会与嘉和基金会以外的任何公司、组织和个人共享您的个人信息，但以下情况除外： We will not share your personal information with any company, organization or individual other than the Foundation, except for the following:

(1) 事先获得您明确的同意或授权；

Obtain your explicit consent or authorization in advance;

(2) 根据适用的法律法规、法律程序的要求、强制性的行政或司法要求所必须的情况下进行提供；

Must provide in accordance with applicable laws and regulations, legal process requirements, mandatory administrative or judicial requirements when necessary;

(3) 在法律法规允许的范围内，为维护嘉和基金会、嘉和基金会的关联方或合作伙伴、您或其他嘉和基金会用户或社会公众利益、财产或安全免遭损害而有必要提供；

To the extent permitted by laws and regulations, it is necessary to provide protection for the interests of the Foundation, its affiliates or partners, you or other the Foundation users, or the general public, property or safety from damage;

(4) 只有共享您的信息，才能实现我们的服务的核心功能或提供您需要的服务；

Only by sharing your information can we achieve the core functions of our services or provide the services you need;

- (5) 应您需求为您处理您与他人的纠纷或争议；

To handle disputes or disputes between you and others according to your needs;

- (6) 符合与您签署的相关协议（包括在线签署的电子协议以及相应的平台规则）或其他的法律文件约定所提供；

To provide in accordance with relevant agreements signed with you (including electronic agreements signed online and corresponding platform rules) or other legal documents;

- (7) 基于学术研究而使用；

To use based on academic research;

- (8) 基于符合法律法规的社会公共利益而使用。

To use based on social and public interests in compliance with laws and regulations.

2. 我们可能会将您的个人信息与我们的关联方共享。但我们只会共享必要的个人信息，且受本隐私政策中所声明目的的约束。我们的关联方如要改变个人信息的处理目的，将再次征求您的授权同意。

We may share your personal information with our affiliates. However, we will only share the necessary personal information and are bound by the purpose stated in this privacy policy. If our affiliates want to change the purpose of processing personal information, they will seek your authorization and consent again.

3. 对我们与之共享个人信息的公司、组织和个人，我们会与其签署严格的保密协定，要求他们按照我们的说明、本隐私政策以及其他任何相关的保密和安全措施来处理个人信息。在个人敏感数据使用上，我们要求第三方采用数据脱敏和加密技术，从而更好地保护用户数据。

For companies, organizations and individuals with whom we share personal information, we will be signed a strict confidentiality agreement, requiring them to process personal information in accordance with our instructions, this privacy policy and any other related confidentiality and security measures. In the use of personal sensitive data, we require third parties to use data desensitization and encryption technologies to better protect user data.

4. 为了遵守法律、执行或适用我们的使用条件和其他协议，或者为了保护嘉和基金会、您或其他嘉和基金会用户的权利及其财产或安全，比如为防止欺诈等违法活动和减少信用风险，而与其他公司和组织交换信息。不过,这并不包括违反本隐私政策中所作的承诺而为获利目的出售、出租、共享或以其它方式披露的个人信息。

To comply with laws, enforce or apply our terms of use and other agreements, or to protect the rights and property or safety of the Foundation, you or other the Foundation users exchange information with other companies and organizations, such as to prevent fraud and other illegal activities and reduce credit risk. However, this does not include personal information that is sold, rented, shared, or otherwise disclosed for profitable purposes in violation of the commitments made in this privacy policy.

(二) 转让 To Transfer Personal Information

我们不会将您的个人信息转让给任何公司、组织和个人，但以下情况除外：

We will not transfer your personal information to any company, organization or individual, except for the following:

1. 事先获得您明确的同意或授权；

Obtain your explicit consent or authorization in advance;

2. 根据适用的法律法规、法律程序的要求、强制性的行政或司法要求所必须的情况进行提供；

Must provide in accordance with applicable laws and regulations, legal process requirements, mandatory administrative or judicial requirements when necessary;

3. 符合与您签署的相关协议（包括在线签署的电子协议以及相应的平台规则）或其他的法律文件约定所提供；

To provide in accordance with relevant agreements signed with you (including electronic agreements signed online and corresponding platform rules) or other legal documents;

4. 在涉及合并、收购、资产转让或类似的交易时，如涉及到个人信息转让，我们会要求新的持有您个人信息的公司、组织继续受本隐私政策的约束，否则，我们将要求该公司、组织重新向您征求授权同意。

When involving mergers, acquisitions, asset transfers or similar transactions, if personal information transfer is involved, we will require new companies and organizations that hold your personal information to continue to be bound by this privacy policy, otherwise, we will require the company and organization will ask you for authorization again.

（三） 公开披露 **To Publicly Disclose Personal Information**

我们仅会在以下情况下，且采取符合业界标准的安全防护措施的前提下，才会公开披露您的个人信息：

Under the premise of adopting safety protection measures in line with industry standards, we will only publicly disclose your personal information if:

1. 根据您的需求，在您明确同意的披露方式下披露您所指定的个人信息；

According to your needs, to disclose the personal information you specify in the disclosure method that you explicitly agree to;

2. 根据法律、法规的要求、强制性的行政执法或司法要求所必须提供您个人信息的情况下，我们可能会依据所要求的个人信息类型和披露方式公开披露您的个人信息。在符合法律法规的前提下，当我们收到上述披

露信息的请求时，我们会要求必须出具与之相应的法律文件，如传票或调查函。我们坚信，对于要求我们提供的信息，应该在法律允许的范围内尽可能保持透明。我们对所有的请求都进行了慎重的审查，以确保其具备合法依据，且仅限于执法部门因特定调查目的且有合法权利获取的数据。在法律法规许可的前提下，我们披露的文件均在加密密钥的保护之下。

When it is necessary to provide your personal information in accordance with the requirements of laws and regulations, mandatory administrative law enforcement or judicial requirements, we may publicly disclose your personal information based on the type of personal information required and the method of disclosure. Under the premise of complying with laws and regulations, when we receive the above-mentioned request for information disclosure, we will request that a corresponding legal document, such as a subpoena or investigation letter, must be issued. We firmly believe that the information requested from us should be as transparent as possible within the scope permitted by law. We have carefully reviewed all requests to ensure that they have a legitimate basis and are limited to data obtained by law enforcement agencies for legitimate investigation purposes and legal rights. As permitted by laws and regulations, the documents we disclose are all protected by encryption keys.

三、 我们如何保护和保存您的个人信息 **How we protect and preserve your personal information**

1. 您的个人信息将全被存储于中华人民共和国境内。如您使用跨境交易服务，且需要向境外传输您的个人信息完成交易的，我们会单独征得您的授权同意并要求接收方按照我们的说明、本隐私政策以及其他任何相关的保密和安全措施来处理这些个人信息。

All your personal information will be stored in the People's Republic of China. If you use cross-border transaction services and need to transfer your personal information overseas to complete the transaction, we will

separately obtain your authorized consent and require the recipient to follow our instructions, this privacy policy and any other related confidentiality and security Measures to process this personal information.

2. **如果我们终止服务或运营，我们会至少提前三十日向您通知，并在终止服务或运营后对您的个人信息进行删除或匿名化处理。**

If we terminate the service or operation, we will notify you at least thirty days in advance, and delete or anonymize your personal information after the service or operation is terminated.

四、 我们如何处理未成年人的个人信息 How we handle minor's personal information

1. 我们非常重视对未成年人个人信息的保护。

We attach great importance on protecting the minors' personal information.

2. 根据相关法律法规的规定，若您是 18 周岁以下的未成年人，在使用嘉和基金会的服务前，应事先取得您的家长或法定监护人的同意。

If you are under 18 years old, it is suggested before you use the foundation's service, you shall seek consent from your parents or guardians first.

五、 通知和修订 Amendments and updates of this policy

1. 为给您提供更好的服务以及随着嘉和基金会业务的发展，本隐私政策也会随之更新。但未经您明确同意，我们不会削减您依据本隐私政策所应享有的权利。我们会通过在嘉和基金会平台上发出更新版本并在生效前通过网站公告或以其他适当方式提醒您相关内容的更新，也请您访问嘉和基金会以便及时了解最新的隐私政策。

In order to provide you with better services and with the development of Jiahe Foundation's business, this privacy policy will be updated accordingly. However, without your explicit consent, we will not reduce your rights under this privacy policy. We will issue an updated version on the Jiahe Foundation platform and remind you of the update of relevant content through the

website announcement or other appropriate means before it becomes effective. Please also visit Jiahe Foundation to keep up with the latest privacy policy.

2. 对于重大变更，我们还会提供更为显著的通知（我们会通过包括但不限于邮件、短信或在浏览页面做特别提示等方式，说明隐私政策的具体变更内容）。

For major changes, we will also provide more prominent notices (we will include but not limited to emails, text messages, or special reminders on the page to explain the specific changes to the privacy policy).

本政策所指的重大变更包括但不限于：The major changes referred to in this policy include but are not limited to:

- (1) 我们的服务模式发生重大变化。如处理个人信息的目的、处理的个人信息类型、个人信息的使用方式等；

Our service model has undergone major changes. Such as the purpose of processing personal information, the type of personal information processed, and the use of personal information, etc .;

- (2) 我们在所有权结构、组织架构等方面发生重大变化。如业务调整等引起的所有者变更等；

We have undergone major changes in the ownership structure and organizational structure. Owner changes caused by business adjustments, etc .;

- (3) 个人信息共享、转让或公开披露的主要对象发生变化；

The change of main objects of personal information sharing, transfer or public disclosure;

- (4) 您参与个人信息处理方面的权利及其行使方式发生重大变化；

Significant changes in your right to participate in the processing of personal information and how you exercise it;

- (5) 我们负责处理个人信息安全的责任部门、联络方式及投诉渠道发生变化时；

When our responsible department dealing with personal information security, contact information and complaint channels change;

- (6) 个人信息安全影响评估报告表明存在高风险时。

When the personal information security impact assessment report indicates that there is a high risk.

六、 如何联系我们 **How to contact us**

1. 如您对本隐私政策或您个人信息的相关事宜有任何问题、意见或建议，请通过发送邮件至 info@shanghaik.org 或拨打我们的电话+86 021-61979500 与我们联系。

If you have any questions, comments or suggestions about this privacy policy or your personal information, please contact us by sending mail to info@shanghaik.org or calling us through phone number +86 021-61979500.

2. 一般情况下，我们将在三十天内回复。如果您对我们的回复不满意，特别是我们的个人信息处理行为损害了您的合法权益，您还可以向网信、电信、公安及工商等监管部门进行投诉或举报。

Under normal circumstances, we will reply within 30 days. If you are not satisfied with our response, especially if our personal information processing behavior damages your legitimate rights and interests, you can also file a complaint or report to the regulatory authorities for cyberspace Administration, telecommunications, public security, and market regulation.