

## 个人信息保护政策

### Personal Data Protection Policy

#### 特别提示:

#### Important Note:

为方便用户(“您”)注册和使用上海哈罗外籍人员子女学校在线报名平台(网址: [harrowshanghai.openapply.cn](https://harrowshanghai.openapply.cn), “本网站”)的服务, 上海哈罗外籍人员子女学校(“学校”或“我们”, 注册地址为: 上海市浦东新区高西路 588 号。)可能会收集和使用您提供的您本人或相关学生、父母及/或监护人的相关数据和信息(统称“信息”或“用户信息”)。我们将通过《用户隐私政策》(“本隐私政策”或“本政策”)向您说明我们如何收集和使用您的信息, 请您在注册和使用本网站的服务之前认真阅读、充分理解本隐私政策, 尤其是**加粗**的内容。如果您对本隐私政策有疑问的, 请通过本隐私政策约定的方式询问, 我们将解释本隐私政策内容。您使用或在我们更新本隐私政策后继续使用本网站的服务, 即意味着您已经同意本隐私政策, 同意我们按照本隐私政策收集和使用您的相关数据和信息。

To facilitate users (“**You**”) in the process of registration and enjoyment of the services provided by Shanghai Harrow School For Children of Foreign Nationality online registration platform (website: <https://harrowshanghai.openapply.cn>) (this “**Website**”), Shanghai Harrow School For Children of Foreign Nationality (“**School**” or “**We**”/“**Us**”, with registered address at No.588 Gaoxi Road, Pudong New District, Shanghai) may collect or use the data and information of Yourself or the relevant student, parents and/or guardians provided by You (collectively, “**Information**” or “**User Information**”). We will explain to You how We collect and use Your information through the User Privacy Policy (this "**Privacy Policy**" or this "**Policy**"). Please ensure that You read and fully understand this Privacy Policy before registering and using the services provided by this Website, especially the content in **bold**. If there are any doubts as to the content of this Policy, kindly inquire through the method set out under this Policy and We will provide the necessary clarification. If you use or continue to use the services provided by this Website after We updated the content of this Privacy Policy, You are deemed to have agreed to this Privacy Policy and agreed to Us collecting and using your data and information in accordance with the terms of this Privacy Policy.

本政策将帮助您了解以下内容:

**This Policy will assist you to understand the following:**

1. 我们如何收集和使用您提供的信息  
**How We collect and use the Information provided by You**
2. 我们如何使用 Cookie 和同类技术  
**How We use Cookie and similar technologies**
3. 信息存储  
**Information storage**
4. 信息共享、转移、公开披露  
**Sharing, Transferring and Disclosing Information**
5. 我们如何保护您提供的信息  
**How We protect the Information provided by You**
6. 您的权利  
**Your Rights**
7. 我们如何处理儿童的个人信息  
**How We Deal with Personal Data belongs to Children**
8. 隐私政策的修订  
**Amendments to Privacy Policy**
9. 如何联系我们  
**Contact Us**

1. 我们如何收集和使用您提供的信息 **How We collect and use the Information provided by You**

- 1.1 基本业务功能 **Basic Operation Functions**

本网站的基本业务功能为供用户向学校提交入学申请，以及对已入学学生的就学事务进行管理。该等业务功能的运行需要您向我们提供或允许我们收集以下必要信息：

The basic operation functions of this Website provide access for Users to submit admission applications to the School and allow the School to manage the affairs of students who have been enrolled. The operation of such functions requires You to provide us or allow Us to collect the following necessary information:

- 1.1.1 用户注册 **Registering an Account**

您注册本网站账户时，需要提供真实、准确、完整、有效的注册信息和资料，包括您的姓名、您的性别、您的电子邮件、您的手机号码。

When registering an account on this Website, You will need to provide true, accurate, complete and effective information and data, including Your name, gender, email address and mobile number.

### 1.1.2 用户申请参加招生咨询 Application for Admission Consultation

您注册本网站账户后，可以申请参加学校招生咨询活动。您提交申请时，需要向我们提供**学生姓名、学生性别、学生出生日期、学生国籍、学生入学年份、父母及/或监护人姓名、父母及/或监护人与学生的关系、父母及/或手机号码、父母及/或电子邮件等。**

Upon registration of an account on this Website, You may apply for the School admission consultation sessions. When submitting Your application, You will need to provide Us with the **name, gender, date of birth, nationality and enrollment year of the student, parents and/or guardian name, parents and/or guardian-student relationship, parents and/or guardian mobile phone number, parents and / or guardian email etc.**

### 1.1.3 用户提交入学申请和申请资料 Submission of Application and Application Documents

您注册本网站账户后，可以按照本网站要求向学校提交学生入学申请。您提交入学申请时，需要向我们提供学生的姓名、性别、国籍、出生日期、护照信息、中国签证信息、入学年份、受教育背景、成绩、获奖情况和过往在校表现；家庭成员的姓名、受教育背景、生日、联系信息；学生推荐人的姓名、出生日期、受教育背景、联系信息等。

Upon registration of an account on this Website, You may submit admission application to the School in accordance with the requirements set out in this Website. When submitting Your application for admission, you will need to provide us with the **name, gender, nationality, date of birth, passport information, Chinese visa information, enrollment year, education background, grades, awards and past school performance record of the students; names, education background, date of birth and contact details of family members; name, date of birth, education background, contact details of the student's referee, etc.**

### 1.1.4 费用支付与退还 Fee Payment and Refund

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

Upon registration of an account on this Website, the School may collect **Your bank account information or third-party payment platform account information, transaction serial number, payment status and other**

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

#### 1.1.5 用户提供医疗信息 Medical Information

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

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

#### 1.1.6 用户填写校车表 School Bus Application

您注册本网站账户后，如您需要学校的校车服务，您需要向学校提交学生姓名、家庭住址、家长联系信息等。

**Upon registration of an account on this Website, You will need to provide student's name and home address, parents'/ guardian's contact information to the School, if you require school bus service.**

#### 1.1.7 日常沟通和联系 Daily Communication and Contact

您注册本网站账户后，学校将通过您提交的联系信息，与学生的家长就学校和学生的相关情况进行沟通和联系。

**Upon registration of an account on this Website, the School will contact the**

**students' parents via the contact details provided by You in order to communicate with the parents with regard to information/ development of the School and students.**

## 1.2 拓展业务功能 Marketing

学校可能会使用学生/家长向学校提交的个人信息,或家长/学生参与校内外学习、生活及活动的照片、视频、音频等素材,用于学校的市场宣传。学校将会使用您提交的个人信息,向您发送新闻简报、最新消息和宣传资料等信息。经您的同意后,学校也可能会在各线上线市场渠道,例如校内外媒体、网站、展会、印刷品、视觉陈列等发布包含您或学生的照片、视频、音频等素材。

**The School may use the personal information submitted by students/parents to the School or photos, videos, audios and other materials of parents/students participating in learning programmes, daily life and activities inside and outside the School for the purpose of marketing. The School will use the personal data submitted by You to send You news briefings, latest news and promotional materials. With Your consent, the School may also publish photos, videos, audios and other materials containing You or students in various online and offline marketing channels, such as the School's internal and external medias, websites, exhibitions, prints, visual displays, etc.**

## 2. 我们如何使用 Cookie 和同类技术 How We use Cookie and similar Technologies

### 2.1 Cookie

为确保网站正常运转,我们会在您的计算机或移动设备上存储名为 Cookie 的小数据文件。Cookie 通常包含标识符、站点名称以及一些号码和字符。借助于 Cookie,网站能够存储您的偏好或购物篮内的商品等数据。

**To ensure that this Website operates properly, We store small data files named cookies on your computer or mobile device. Cookies usually contain identifiers, site names, and some numbers and characters. With the help of cookies, this Website will be able to store data such as Your preferences or products in your shopping basket etc.**

我们不会将 Cookie 用于本政策所述目的之外的任何用途。您可根据自己的偏好管理或删除 Cookie。有关详情,请参见 [AboutCookies.org](http://AboutCookies.org)。您可以

清除计算机上保存的所有 Cookie，大部分网络浏览器都设有阻止 Cookie 的功能。但如果您这么做，则需要每一次访问我们的网站时亲自更改用户设置。如需详细了解如何更改浏览器设置，请访问以下链接：<Internet Explorer>、<Google Chrome>、<Mozilla Firefox>、<Safari> 和 <Opera>。

**We will not use cookies for any purpose other than those described in this Policy. You can manage or delete cookies according to Your preferences. Please refer to AboutCookies.org. for further details. You can clear all cookies saved on Your computer, and most web browsers have a function to block cookies. However, if You do so, You will need to change the user settings Yourself each time You visit our Website. To learn more about how to change Your browser settings, please visit the following links: <Internet Explorer>, <Google Chrome>, <Mozilla Firefox>, <Safari> and <Opera>.**

## 2.2 网站信标和像素标签 Web Beacons and Pixel Tags

除 Cookie 外，我们还会在网站上使用网站信标和像素标签等其他同类技术。例如，我们向您发送的电子邮件可能含有链接至我们网站内容的点击 URL。如果您点击该链接，我们则会跟踪此次点击，帮助我们了解您对产品或服务偏好并改善客户服务。网站信标通常是一种嵌入到网站或电子邮件中的透明图像。借助于电子邮件中的像素标签，我们能够获知电子邮件是否被打开。如果您不希望自己的活动以这种方式被追踪，则可以随时从我们的寄信名单中退订。

**In addition to cookies, We also use other similar technologies such as web beacons and pixel tags on our Websites. For example, the email We send You may contain an URL that links to the content of our Website. If You click on to the link, We will track such action to help Us understand your preference against products or services thereby improving our customer service. Web beacons are usually transparent images embedded in a website or email. With the help of pixel tags in emails, We will be able to know whether emails are opened. If You do not want Your activity to be tracked in such way, You can unsubscribe from our mailing list at any time.**

## 2.3 Do Not Track（请勿追踪）

很多网络浏览器均设有 Do Not Track 功能，该功能可向网站发布 Do Not Track 请求。目前，主要互联网标准组织尚未设立相关政策来规定网站应如何应对此类请求。但如果您的浏览器启用了 Do Not Track，那么我们的

所有网站都会尊重您的选择。

**Many web browsers are equipped with Do Not Track function, which can issue Do Not Track requests to websites. At present, major Internet standards organizations have not established policies to regulate how websites should respond to such requests. But if Do Not Track is enabled in your browser, then all of our websites will respect your choice.**

### 3. 信息存储 Information Storage

- 3.1 我们收集的信息将保存在位于中华人民共和国境内（为本隐私政策之目的，不含香港、澳门、台湾地区）的服务器上。同时，出于为学校提供有效管理和维持教育质量的需要，我们或会将收集的信息提供给学校管理公司总部 Asia International School Limited（一家根据开曼群岛法律注册、主营业务地址在香港的有限公司），并将信息储存于中国境内和香港的服务器上。如在符合适用法律规定的情形下因业务需要向其他境外机构或个人传输个人信息的，我们会事先征得您的同意，告知信息出境的目的、接收方等情况，并履行相关法律法规规定的程序。

**The information We collect will be stored on servers located in the People's Republic of China (for the purpose of this Privacy Policy, excluding Hong Kong, Macau, and Taiwan). At the same time, in order the School to provide effective management and maintain the quality of education, We may provide the data collected to headquarters of the School management company, Asia International School Limited (a company limited by shares incorporated under the Cayman Islands law with principal business address in Hong Kong), and store such data on the servers in China and Hong Kong.**

- 3.2 对于所收集的信息，我们的保存期限为实现本网站业务功能所必需的最短时间，并严格遵守法律及相关法规规定。在保存期限届满、您的信息已经不再需要用于实现本隐私政策规定的目的和用途、也无需根据相关法律法规的规定保存时，我们将采取合理步骤以安全的方式销毁个人信息或使其不可识别并不可被再次编辑、修改、使用。

**For the data collected, the retention period is the minimum time necessary to realize the operation functions of this Website, and We will abide by the laws and relevant regulations strictly. Upon the expiration of the retention period, or your information is no longer needed for the purposes of this Privacy Policy, or when it is not required to be retain in accordance with**

relevant laws and regulations, We will take reasonable steps and safe mode to remove personal information or make it unrecognizable and cannot be edited, modified or used again.

#### 4. 信息共享、转移、公开披露 Sharing, Transferring and Disclosing Information

##### 4.1 共享 Information Sharing

未经您事先同意，我们不会与任何第三方共享您提供的信息，但以下情形除外：

**We will not share Information provided by You with any third parties without your consent, except for the following:**

- (1) 在获取明确同意的情况下共享：经您事先明确同意，我们会与其他方共享您的信息；

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

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

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

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

**Sharing with third-party suppliers: Some of our services will be provided by third-party suppliers where necessary. For example, school web design suppliers, school software design suppliers, marketing and public relations companies, catering suppliers and school uniform suppliers etc. We will only share Your Information with third-party suppliers for specific and clear purposes based on legitimate, proper and necessary principles, and We will only share User Information which is necessary to provide services. We will request our suppliers to comply with this Privacy Policy and any other**



**relevant confidentiality and security measures when processing Your Information.**

- (4) 为向您提供服务之需，我们可能会向集团内的其他学校或关联方披露您的信息。

**For the purpose of providing service to You, We may need to disclose Your Information to our Affiliated Schools or Group's affiliates.**

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

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

#### 4.2 转移 Transfer of Information

我们不会将您的个人信息转移给任何公司、组织和个人，但以下情况除外：

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

- (1) 在获取明确同意的情况下转让：获得您的明确同意后，我们会向其他方转移您的个人信息；

**Transfer with explicit consent: Upon obtaining Your explicit consent, We will transfer Your personal information to other parties;**

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

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

#### 4.3 公开披露 Public Disclosure

我们仅会在以下情况下，公开披露您的信息：

**We will only disclose your Information under the following circumstances:**

- (1) 获得您明确同意后；

**Upon obtaining your express consent;**

- (2) **基于法律的披露：**在法律、法律程序、诉讼或政府主管部门强制性要求的情况下，我们可能会公开披露您的信息。

**Disclosure based on law: In the case of mandatory requirements by laws, legal procedures, law suits or government authorities, We may disclose Your Information publicly.**

**5. 我们如何保护您提供的信息 How do We Protect Your Information**

**5.1 我们对用户信息的保护 Protection of User Information**

- (1) 我们已使用符合业界标准的安全防护措施保护您提供的个人信息，防止数据遭到未经授权访问、公开披露、使用、修改、损坏或丢失。我们会采取一切合理可行的措施，保护您提供的信息。例如，在您的浏览器与“服务”之间交换数据（如信用卡信息）时受 SSL 加密保护；我们同时对本网站提供 https 安全浏览方式；我们会使用加密技术确保数据的保密性；我们会使用受信赖的保护机制防止数据遭到恶意攻击；我们会部署访问控制机制，确保只有授权人员才可访问个人信息；以及我们会举办安全和隐私保护培训课程，加强员工对于保护个人信息重要性的认识。

We have used security safeguards that meet industry standards to protect the personal information You provide and prevent data from unauthorized access, public disclosure, use, modification, damage or loss. We will take all reasonable and feasible measures to protect the information You provide. For example, when exchanging data (such as credit card information) between your browser and the "service", it is protected by SSL encryption; We also provide https secure browsing to this Website; We will use encryption technology to ensure the confidentiality of data; We will use a trusted protection mechanism to prevent data from malicious attacks; We will deploy an access control mechanism to ensure that only authorized personnel can access personal information; and We will organize security and privacy protection training courses to enhance employees' awareness of the importance of protecting personal information.

- (2) 我们已经取得了 SSL 认证，设置流量加密、强哈希密码、开启防火墙，用于检测可疑行为，阻止恶意企图获取访问权限或破坏服务（例

如 DDOS 攻击), 并设置安全性访问策略, 审核日志和机密性协议。

We have obtained SSL certification, We have also set traffic encryption, strong harsh passwords and open firewalls in order to detect suspicious behavior, prevent malicious attempts to gain access or damage services (such as DDOS attacks), and set security access policies, audit logs and confidentiality agreement.

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

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

- (4) 互联网并非绝对安全的环境, 而且电子邮件、即时通讯、及与其他非学校平台用户的交流方式并未加密, 我们强烈建议您不要通过此类方式发送个人信息。请使用复杂密码, 协助我们保证您的账号安全。

**The Internet is not an absolutely safe environment. Email, instant messaging and communication channels with other non-school platform users are not encrypted. We strongly recommend that You do not send personal information through such methods. Please use a complex password to help Us to keep your account safe.**

- (5) 我们将定期更新并公开安全风险、个人信息安全影响评估等报告的有关内容。

We will regularly update and publish the relevant contents of the reports on security risks, personal data security impact assessment, etc.

- (6) 互联网环境并非百分之百安全, 我们将尽力确保或担保您发送给我们的任何信息的安全性。如果您发现我们的物理、技术、或管理防护设施遭到破坏, 导致信息被非授权访问、公开披露、篡改、或毁坏, 或导致您的合法权益受损的, 请您及时和我们联系。

**The Internet environment is not 100% secure. We will do our best to ensure or ensure the security of any information You send to Us. If You discovered Our physical, technical or management protection facilities are damaged, resulting in unauthorised access to information, public disclosure, tampering or destruction, or resulting in damage to Your legitimate rights and interests, kindly contact Us immediately.**

- (7) 在不幸发生个人信息安全事件后, 我们将按照法律法规的要求, 及时

向您告知：安全事件的基本情况和可能的影响、我们已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。我们将及时将事件相关情况以邮件、信函、电话、推送通知等方式告知您，难以逐一告知个人信息主体时，我们会采取合理、有效的方式发布公告。

**In the unfortunate event of the occurrence of a personal data security incident, We will promptly inform You in accordance with the requirements of laws and regulations: the basic information and possible impact of such incident, the measures We have taken or will take, suggestions You may adopt separately to prevent and reduce risks, remedies for You, etc. We will promptly inform You about the incident by email, letter, phone, push notification, etc. If it is difficult to inform the owners of the personal data individually, We will adopt a reasonable and effective method to publish such notification.**

同时，我们还将按照监管部门（如网信部门、电信部门、公安部门）要求，主动上报个人信息安全事件的处置情况。

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

## 5.2 用户对信息的保管 Protection of Personal Data by the Users

尽管有前述安全措施，但请您妥善保管您的账号、密码及其他信息，避免您的信息泄露。如果您发现您的账号、密码或其他信息被他人非法使用或有使用异常的情况的，应当及时通知我们，我们将采取相应安全保障措施。

**Despite the aforementioned security measures, please keep Your account password and other information safe to avoid leakage of Your Information. If You discover that your account number, password or other information has been illegally used by others or there is an unusual use of account, You should notify Us promptly and We will take corresponding security measures.**

## 6. 您的权利 Your Rights

### 6.1 查询 Enquiry

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

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

## 6.2 变更 Amendments

您应当确保向我们提交的所有信息均准确无误。如果您发现我们对您的信息收集、存储有错误，您可以通过上述第 6.1 条列明的方式要求我们对相关信息予以更正。

**You should ensure that all information submitted to Us is accurate.** If You find that we have made errors in the collection and storage of Your Information, You may request Us to correct the relevant Information in the manner set out in paragraph 6.1 above.

## 6.3 删除 Removal

若您发现我们未按照法律法规的规定或者本隐私政策约定收集和使用您的信息，您可以通过上述第 6.1 条列明的方式联系我们对相关信息进行删除。

If You discovered that We have not collected and used Your Information in accordance with the provisions of laws and regulations or the provisions of this Privacy Policy, You may contact Us through the methods set out in paragraph 6.1 above to request for removal of the relevant Information.

## 6.4 改变或撤回授权同意 Amend or Withdraw Authorisation

每个基本业务功能需要一些基本的个人信息才能得以完成。对于为了实现扩展业务功能之目的而收集的信息，您可以改变或撤回您的授权同意。您可以通过上述第 6.1 条列明的方式对您的授权进行管理。**当您撤回同意后，我们将不再处理相应的信息。但您撤回同意的决定，不会影响此前基于您的授权而开展的信息处理活动。**

Each basic business function requires some basic personal information to be completed. For information collected for the purpose of marketing, You may amend or withdraw the authorisation previously provided by You. You may manage Your authorisation in the manner set out in paragraph 6.1 above. **When You withdraw your authorisation, We will no longer process Your corresponding Information. However, Your decision to withdraw Your authorisation will not affect the Information previously processed based on Your authorisation.**

## 6.5 注销账户 Deregistration

您可以通过上述第 6.1 条列明的方式要求注销账户。

You can request to deregister the account via the method set out in paragraph 6.1 above.

- 6.6 为保障安全，您申请查询、变更、删除您的信息或注销账户时，可能需要提供书面请求，或以其他方式证明您的身份。我们可能会先要求您验证自己的身份，然后再处理您的请求。

**For security reason, You may need to provide a written request or prove your identity when you make inquiries or submit for changes, deletion of Your Information or deregistration of Your account. We may ask You to verify Your identity before processing Your request.**

## 7. 我们如何处理儿童的个人信息 How We Deal with Personal Data belongs to Children

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

**We understand that the personal data of the students We collect and use may be minors ("Children") under the age of 14. We place great importance to the protection of Children's personal data. We will follow the relevant laws and regulations strictly and fulfill our responsibility in protection of Children's personal data. We agree to the following:**

- 7.1 未经父母或监护人同意，儿童不得创建自己的用户账户。

**Children shall not set up its own User account without the consent of his/her parents or guardian.**

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

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

- 7.3 我们将仅在获取儿童父母或监护人授权同意的前提下、严格按照相关法律法规和本隐私政策的规定收集、使用儿童个人信息，我们不会收集与所提供无关的儿童个人信息。

**We will only collect and use children's personal data in strict compliance with the relevant laws and regulations and this Privacy Policy on the premise of obtaining the authorised consent of the Child's parent or guardian. We will not collect Children's personal data unrelated to the services provided.**

- 7.4 我们将按照本政策第 3 条规定的方式和期限存储儿童个人信息，我们存储儿童个人信息不会超过实现收集、使用目的所必需的期限。

**We will store Children's personal data in the manner and within the time limit specified in paragraph 3 of this Policy. We will not store Children's personal data beyond the time limit necessary for the purpose of collection and use.**

- 7.5 我们将采取加密等措施存储儿童个人信息，确保信息安全。

**We will adopt encryption and other measures to store Children's personal data to ensure the data is secure.**

- 7.6 我们不会违反相关法律法规规定或约定的目的、范围使用儿童个人信息。如果因服务需要，确需超出约定的目的、范围使用的，我们会再次征得儿童父母或监护人的同意。

**We will not use Children's personal data in violation of the relevant laws and regulations or the purpose and scope of the agreement. If it is necessary to use the data beyond the agreed purpose and scope for the purpose of provision of the service, We will obtain the consent of the Child's parent or guardian again.**

- 7.7 我们将以最小授权为原则，严格设定信息访问权限，控制儿童个人信息知悉范围。

**We will set up strict data access authority and control the scope of children's personal information based on the principle of minimum authorization.**

- 7.8 儿童及其父母或监护人同样享有本隐私政策第 6 条规定的权利。

**Children and their parents or guardians enjoy the rights as specified in paragraph 6 of this Privacy Policy.**

- 7.9 我们会指定专人负责儿童个人信息保护事宜，如有相关疑问可以按照本隐

私政策第 9 条规定的方式与我们联系。

**We will designate an officer to be responsible for the protection of Children 's personal data. If there is any questions, You may contact Us in accordance with the provisions of paragraph 9 of this Privacy Policy.**

## 8. 隐私政策的修订 **Amendment of Privacy Policy**

- 8.1 基于为您提供更好的服务的目的，并根据相关法律法规及监管政策变化的要求，我们可能会适时修订本隐私政策，修订后的本隐私政策将公布于本网站，我们将以在本网站发布公告的方式来通知您。如您在本政策修订后继续使用本网站的服务，即表示您已充分阅读、理解并接受更新后的隐私政策约束。

**For the purpose of providing You with a better service, and to comply with the requirements of the changes in relevant laws, regulations and regulatory policies, We may revise this Privacy Policy in due course. The revised Policy will be published on this Website. If You continue to use the services provided by this Website after the revision of this Policy, You are deemed to have fully read, understood and accepted the revised Privacy Policy.**

## 9. 如何联系我们 **How to Contact Us**

- 9.1 如您对本隐私政策或您的信息的相关事宜有任何问题、意见、建议或申诉，您可以通过电邮招生部（电子邮件地址：[admission@harrowshanghai.cn](mailto:admission@harrowshanghai.cn)）的方式与我们取得联系。

If You have any questions, comments, suggestions or complaints relating to this Privacy Policy or Your information, You may contact us by sending email to our Admissions Department at [admission@harrowshanghai.cn](mailto:admission@harrowshanghai.cn).

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