

# Privacy Policy of Yale Center Beijing

Effective Date: [●]

This Privacy Policy of Yale Center Beijing (the “**Policy**”) applies to the collection and processing of your personal information by Yale Center Beijing (“**YCB**”, “**we**” or “**us**”).

YCB is committed to respecting your privacy and protecting your personal information. This Policy describes how we collect, use, share or otherwise process your personal information, when you communicate and interact with us directly, including participate in our programs and activities in person or via online channels, visit [www.centerbeijing.yale.edu](http://www.centerbeijing.yale.edu), subscribe to our WeChat official account, follow us on Weibo, or other sites displaying this Policy (collectively, “**Websites**”).

## 1. Collection and Use of Your Personal Information

When you interact with us, we may collect and use your personal information for the following purposes:

### A. Account Registration

When you register an account with us, you need to provide us with your [first name, last name, email address and profile photo] and we will verify whether your identity is valid by sending an email to your email account, otherwise you will not be able to register an account.

In order to improve your account information, you may also provide us with your address, city, province/city, postal code, country/region, industry and title, which will allow us to provide you with more personalized services. If you choose not to provide such information, it will not affect your use of the basic services we provide.

If you choose to log into our Websites through a third party account (such as your Apple account or WeChat account), we will collect your WeChat profile photo, nickname and region.

### B. Sign up for our programs and activities

We may collect your first name, last name, phone number, email address, company name and title, school name and grade, questions for relevant programs and activities when you sign up for our programs and activities.

### C. Participation of our programs and activities

We may collect name, date of birth, gender, address, personal phone number, email address, network identification information (including IP address), personal internet access records (including website browsing records, software usage records), affiliation, position title, location and profession when you participate in our online programs and activities.

Please note that your presentations, videos, photos, audios, conversations, resume, and other materials provided by you may also be collected if you act as the speakers of our programs and activities.

**D. Payment for participation of our programs and activities**

When you make a payment to participate in our programs and activities, we can collect your payment information (including your names, bank card numbers, transaction information) directly for certain programs, or you can choose any of the third-party payment providers we work with (including Yoopay, GlueUp, WeChat Pay, UnionPay and Alipay; hereinafter referred to as “**Payment Providers**”). We need to share your order number and transaction amount with these Payment Providers in order for them to confirm your payment instructions and complete the payment.

**E. Interact with us or our programs or services through social networks**

In order to provide you with browsing services within our WeChat official account, we may collect your nickname and the message you left in our backstage.

In order to provide you with browsing and livestreaming services within our WeChat video account, we may collect your nickname and the message you left in our backstage.

**2. Sharing of Your Personal Information with Third Parties**

We will not provide your personal information to third parties in violation of PRC laws (such as without your consent, where consent is required). For the purposes stated in this Policy, we may share your personal information with the following third parties or our affiliated entities:

- A.** In order to accomplish the purposes listed in this Policy, only to the extent necessary and lawful, we may share your personal information within our affiliated entities.
- B.** We may share your personal information with third party service providers or authorized partners for the purpose of providing you with services and enhancing user experiences.

Please refer to below for more details of the sharing of your personal information.

Name	Contact Information	Type of Shared Personal Information	Purpose of the Sharing
[Name of Delivery company]	[●]	[Names, cellphone numbers, addresses]	[Product delivery]
[Name of Payment Provider]	[●]	[Names, bank card numbers, transaction information]	[To process payment for participating in programs and activities]

We may also share your personal information with regulators, to comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental authorities.

### 3. Entrusted Processing of Your Personal Information

We may retain other companies and individuals to perform services on our behalf to provide relevant operation and service support, in which process your personal information will be processed by the following types of companies in relation to the purposes mentioned in this Policy, including:

- Data analysis companies;
- Information technology service providers; and
- Website/system server hosting companies.

These third parties may be provided with access to personal information which is necessary to perform their functions, but they will not use such data other than on our behalf or subject to contracts that protect the confidentiality and security of personal information.

### 4. Transfer and Storage of Your Personal Information

In principle, the personal information collected and generated in the PRC will be stored in the PRC. Normally, we will not export your personal information out of China unless upon your separate consent and satisfy requisite conditions required by Chinese laws and regulations and the provision of sufficient protection for your personal information pursuant to this Policy.

### 5. Protection of Your Personal Information

We have implemented measures designed to secure your personal information from accidental loss or unauthorized access, use, alteration, and disclosure. However, the transmission of

information via the Internet is not completely secure. Although we use industry-standard efforts to protect your personal information, we cannot guarantee the security of the information transmitted through our Websites. In case a security incident occurs, we will take remedial actions immediately and notify relevant government agencies and affected individuals, when required by applicable Chinese laws.

## **6. Retention of Your Personal Information**

We only keep Personal Data for as long as it is necessary to accomplish the purposes for which it was collected, except where applicable laws and administrative regulations stipulate otherwise.

## **7. Your Rights**

You may exercise the following rights regarding your personal information that YCB collects and processes:

- Right to access and obtain a copy of your personal information. You have the right to access and request a copy of your personal information that YCB collects and processes.
- Right to rectification. If you find your personal information is inaccurate or incomplete, you have the right to request that YCB correct or supplement the personal information.
- Right to portability. You have the right to request that we provide you with means to transfer your personal information to a specific entity designated by you, to the extent that your request is allowed under applicable Chinese laws.
- Right to object to and restrict processing. Unless otherwise provided by applicable Chinese laws, you have the right to restrict or object to us processing your personal information. If you exercise the above right, you may not be able to use certain services provided by YCB. In addition, you have the right to object at any time where your personal information is processed for direct marketing purposes.
- Right to erasure. Under the following circumstances, if YCB has not deleted your personal information, you have the right to request that we delete your personal information (i) if the purpose of processing has been achieved, is impossible to be achieved, or it is no longer necessary to achieve such purpose of processing; (ii) if YCB ceases to provide services to you, or the retention period for personal information has expired; (iii) if you withdraw your consent (if consent is the basis of processing); (iv) if YCB processes your personal information in violation of applicable Chinese laws, administrative regulations or the agreement with you.

- Right to request explanation. You are entitled to request that we explain the processing rules for your personal information.
- Right to withdraw consent. You have the right to withdraw your consent to the use of your personal information. If you exercise such right, you may not be able to use certain services provided by YCB.

## **8. Children's Personal Information**

We will not offer services to minors under 14 years old, without consent from his/her parents or other legal guardian. We will treat minors' personal information as sensitive personal information and comply with relevant rules on sensitive personal information under PRC laws.

## **9. Updates to This Policy**

We may change our Privacy from time to time. If we do so, the updated policy will be posted on this page and, where appropriate, notified to you by email. Please check back regularly to keep informed of updates or changes to this Policy.

## **10. How to Contact Us**

If you wish to exercise any of the afore-mentioned rights or if you have any questions regarding this Policy, you may direct your request to [yalecenterbeijing@yale.edu](mailto:yalecenterbeijing@yale.edu).

Your request or complaint will be processed, and we will respond to you within 15 working days after receiving your request. We may need to verify your identity if you are requesting information about yourself or a close relative.