

Participants' and Applicants' Privacy Notice for Global Study and Research Programs

全球学习及研究项目参与者及申请者隐私声明

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Who are we (Introduction)?

我们是谁（简介）？

Emeritus (together with its relevant subsidiaries, associates, and affiliated companies as listed in [Annexure-1](#) of this Participants' and Applicants' Privacy Notice for Global Study and Research Programs ("Notice"), collectively referred to as "Emeritus", "us", "we", or "the Company") is committed to protecting and securing the confidentiality of, and to lawfully handling and effectively managing the personal data we collect from and about our students, participants and applicants.

易睿拓思【连同本全球学习和研究项目参与者和申请人隐私声明（“声明”）附件-1 中所列的相关子公司、伙伴和关联公司，统称为“易睿拓思”、“我们（第三人称）”、“我们（第一人称）”或“公司”】致力于保护和确保我们从学生、参与者和申请人处收集的個人資料的保密性，并依法处理和有效管理这些数据。

All the references to "child" or "children" in this Notice shall refer to children (minors) under a certain age (age of majority) as defined and notified under the applicable laws, including the privacy laws, of the country of residence of the child or the country of origin their personal data, as applicable.

本声明中所有提及的“儿童”或“儿童”均指根据适用法律（包括儿童居住国或其个人资料来源国的隐私法律，如适用）定义和告知的未满一定年龄（成年年龄）的儿童（未成年人）。

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Our Vision and Mission Statement

我们的愿景和使命

(Global Data Protection Office at) Emeritus is committed to maintaining trust, meeting expectations, and upholding the rights of the individuals whose personal data we collect by efficiently protecting their personal data, diligently complying with the applicable privacy laws, persistently adhering to the privacy principles, and conscientiously following the privacy best practices. We understand the value of personal data and the significance of its processing in running our business, and we reinforce our pledge to remain bound to our obligations of fairness and transparency while handling personal data and related operations.

易睿拓思（全球数据保护办公室）致力于通过有效保护个人数据、勤勉地遵守适用的隐私法律、坚持不懈地恪守隐私原则并自觉遵守隐私最佳实践，来维护我们所收集的个人数据的信任、满足个人期望并维护个人权利。我们深知个人数据的价值以及处理个人数据对我们业务运营的重要意义，因此我们承诺在处理个人数据和相关业务时，将始终履行公平和透明的义务。

What is the purpose of this notice?

本声明的目的是什么？

This Notice outlines and describes how personal data or information of the global study and research program (“study trip”) applicants and participants is collected, managed, and processed by Emeritus. Emeritus is committed to handling the personal data of the participants and applicants with fairness and transparency, and in a lawful manner. This Notice covers the minimum controls and obligations that Emeritus is committed towards for ensuring that the personal data is collected, used, retained, and disclosed in a secure, lawful, transparent, and compliant manner.

本声明概述并描述了易睿拓思如何收集、管理和处理全球学习与研究项目（“研学项目”）申请人和参与者的个人数据或信息。易睿拓思致力于以公平、透明和合法的方式处理参与者和申请人的个人数据。本声明涵盖了易睿拓思为确保以安全、合法、透明和合规的方式收集、使用、保留和披露个人数据而承诺的最低控制和义务。

Whom is this notice directed to (Scope)?

本声明的对象（范围）是谁？

This Notice applies to enrolled participants or applicants to the study trips offered by Emeritus, and to their parents and legal guardians in case of child participants (collectively “you”, “your”) and is

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designed to inform you of the personal data that we collect, our purposes of processing that data and your rights in connection with it.

本声明适用于报名参加或申请参加由易睿拓思提供的研学项目的人员，以及儿童参与者的父母和法定监护人（统称为“您”、“您的”），旨在告知您我们收集的个人数据、我们处理这些数据的目的以及您与之相关的权利。

This Notice is dedicated only to the study trips that Emeritus organizes and offers and applies to all the personal data collected and processed as part of the planning, management, and execution of the study trips.

本声明仅适用于易睿拓思组织和提供的研学活动，并适用于在研学活动的规划、管理和执行过程中收集和处理的个人数据。

This Notice does not apply to personal data belonging to other categories of individuals like our marketing leads, faculty members, students and applicants for other programs and courses offered by Emeritus, vendors, employees, job applicants, or clients engaged with or by Emeritus. See our [Privacy Notices](#) page for more information. However, as more than one of the above notices may apply to you depending upon the context in which your personal data is collected and processed (e.g., an employee may also be a student), be sure to carefully read each applicable notice that we provide to you so that you are fully informed.

本声明不适用于属于其他类别个人的个人数据，如我们的营销线索、教职员工、学生和申请参加由易睿拓思提供的其他项目和课程的申请人、供应商、员工、求职者或与易睿拓思合作或由易睿拓思引入的客户。更多信息，请参阅我们的“隐私声明”页面。然而，根据您的个人数据被收集和处理的的具体情况（例如，员工也可能是学生），上述不止一项通知可能适用于您，因此，请务必仔细阅读我们向您提供的每项适用声明，以便您充分了解情况。

What are the categories/types of personal data we collect about you?

我们收集的您的个人数据包含哪些类别？

The personal data that we collect, and process may vary depending upon the study trip you select, the requirements of the university partner associated with that study trip, and obligations arising under the applicable laws. The personal data that we collect from you is stored within the electronic records/database stored on servers (including cloud servers) located in Singapore, Japan, Canada, U.S., India, P.R.China, or in another country (including third countries that are not covered by an adequacy decision of the European Commission), as well as within physical records/database.

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我们收集和处理的个人数据可能会有所不同，这取决于您选择的研学项目、与该研学项目相关的大学合作伙伴的要求以及适用法律规定的义务。我们向您收集的个人信息存储在位于新加坡、日本、加拿大、美国、印度、中华人民共和国或其他国家（包括欧盟委员会所作的充分性决定未涵盖的第三国）的服务器（包括云服务器）上的电子记录/数据库中，以及物理记录/数据库中。

Emeritus collects personal data only to the extent it requires it for a particular purpose(s) to organize study trips, for example, to facilitate trip registration, arrange travel and accommodations, process payments, or provide study trip-related updates, and it may collect the following types of personal data from about you and your child:

易睿拓思仅在组织研学项目的特定目的范围内收集个人信息，例如，方便项目报名、安排出行和住宿、处理付款或提供与研学项目相关的最新信息：

Categories of personal data 个人数据类别	Examples of personal data attributes within each category 每个类别个人数据的示例
Identification/Identity data 身份识别/身份数据	Full name, alias, gender, country of residence, nationality, citizenship, location, online identifier, IP address, date of birth, age, photograph, biometric data (as part of any government-issued ID), relationship with the child participant 全名、别名、性别、居住国、国籍、公民身份、所在地、在线标识符、IP 地址、出生日期、年龄、照片、生物特征数据（作为政府颁发的任何身份证件的一部分）、与儿童参与人的关系
Contact details 联系方式	Home address, personal and/or official phone number(s), personal and/or official email address(es), emergency contact details 家庭住址、个人和/或官方电话号码、个人和/或官方电子邮件地址、紧急联系信息
Financial data 财务数据	Billing name and address, bank account information 账单名称和地址、银行账户信息
Electronic identification data	Login ID, password, IP data, website visit logs, browser details

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电子身份识别数据	登录 ID、密码、IP 数据、网站访问日志、浏览器详细信息
User-generated data 用户生成的数据	Attendance, absence records, projects and assignments submitted, evaluation remarks, peer and faculty feedback, performance data, audio and video recordings during online/offline sessions and webinars, responses to surveys, focus groups and quizzes, feedback, and suggestions, comments and testimonials, photographs, and videos taken during study trip 出勤情况、缺勤记录、提交的项目和作业、评估意见、同行和教师反馈、绩效数据、在线/离线会议和网络研讨会期间的录音和录像、对调查、焦点小组和测验的答复、反馈和建议、评论和推荐、照片以及研学项目期间拍摄的视频
Government-issued ID (including copy thereof) 政府颁发的身份证（包括复印件）	Passport, any other acceptable government document 护照、任何其他可接受的政府文件
Health information 健康信息	Disabilities and special accommodation needed, any other information necessary to safeguard a child participant's health, well-being, and safety during the study trip 残疾情况和所需的特殊便利，以及在研学项目期间保障儿童参与者的健康、福祉和安全所需的任何其他信息
Other personal details 其它个人信息	Personal references, language(s) proficiency 个人简历，语言能力
Logistical data 安排协调方面的数据	Visa status, airline ticket status, meal preference, accommodation details 签证状态、机票状态、用餐偏好、住宿详情

Emeritus does not handle your credit or debit card number when processing payment. Such data is collected and processed by third-party payment gateway service providers on our behalf as per our agreements with them and any other rules and regulations applicable to them.

在处理付款时，易睿拓思不会处理您的信用卡或借记卡号码。此类数据由第三方支付服务提供商根据我们与他们签订的协议以及适用于他们的任何其他规则 and 规定代表我们收集和处理的。

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Personal data of others provided by you

您提供的他人的个人信息

In certain situations, you may provide us with the personal data of others (for example, your friends, colleagues, family members, etc.), such as when providing emergency contact details.

在某些情况下，您可能会向我们提供他人（例如您的朋友、同事、家人等）的个人数据，例如提供紧急联系方式。

In such cases, you are responsible for informing the individual(s) and/or obtaining their authorization (where legally required) towards processing their personal data for the purposes communicated to you.

在这种情况下，您有责任通知有关个人和/或获得他们的授权（在法律要求的条件下），以便为了已向您告知的目的处理他们的个人数据。

How do we collect your personal data (Source)?

我们如何收集您的个人数据（来源）？

Personal data collected directly from you for study trip registration, enrollment, and onboarding

直接向您收集的个人信息，用于研学项目登记、注册和参与

Emeritus collects the personal data that we require in order to register the participant for the study trip and subsequently to enroll and onboard them to the program directly from you on the application page on our website.

易睿拓思在网站的申请页面上直接向您收集所需的个人信息，以便为参与者注册研学项目，并随后录取他们参加项目。

We will collect your contact details, financial details, and a copy of your or your participating child's government ID (for example, passport) during the application process. After successful payment for the study trip, we will collect other categories of personal data during the registration process.

在申请过程中，我们将收集您的详细联系信息、财务信息，以及您或您子女的政府身份证件（如护照）复印件。成功支付研学项目费用后，我们将在注册过程中收集其他类别的个人信息。

You are responsible for ensuring that all personal data you provide is accurate, complete, and up to date at the time of application and registration form submission. Inaccurate or outdated information may impact our ability to process your child's study trip application. Please notify us immediately of any changes to your (or the participating child's) personal data to avoid any disruption.

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您有责任确保在提交申请和注册表时，您提供的所有个人资料都是准确、完整和最新的。不准确或过时的信息可能会影响我们处理您子女研学项目申请。如果您（或参加研学项目的孩子）的个人资料有任何变动，请立即通知我们，以免造成任何影响。

Personal data generated during the study trip

研学项目期间生成的个人数据

During the study trip, we may collect some or all of the personal data listed under the category of "user-generated" personal data described above. There are other types of personal data that we may collect based on your or your child's special requirements during the study trip or such personal data that you or your child may voluntarily provide. This could include personal data such as information contained in the travel documents, health and medical information, and other information necessary to organize and manage the study trip experience.

在研学项目期间，我们可能会收集上述“用户生成”个人数据类别中所列的部分或全部个人数据。我们可能会根据您或您的孩子在研学项目期间的特殊要求或您或您的孩子自愿提供的个人数据收集其他类型的个人数据。这可能包括出行文件中包含的信息、健康和医疗信息等个人数据，以及组织和管理研学项目体验所需的其他信息。

Personal data provided by others

他人提供的个人数据

Our corporate clients (the B2B/enterprise clients who engage us for delivering one or more programs to their sponsored candidates) or individuals (like parents/guardians of our present or past participants, etc.) may also refer participants to us for enrolment in different study trips. To identify and, in some cases, register and onboard the participants referred to us, we may initially receive some personal data from the following categories from them:

我们的企业客户（委托我们为其赞助的候选人提供一个或多个项目的B2B/企业客户）或个人（如我们现在或过去参与者的父母/监护人等）也可能向我们推荐参与者参加不同的研学项目。为了识别并在某些情况下登记和接收转介给我们的参与者，我们可能会从他们那里初步接收以下类别的一些个人数据：

- Identification/Identity data
身份识别/身份数据
- Contact details
联系方式

If you have been referred to us, you may still be required to register through our program application page to complete the enrolment and onboarding process. You may be asked to again provide the personal data initially provided to us by your referrer, along with the additional information (personal data) required for the program (study trip) registration.

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如果您已被推荐给我们，您可能仍需通过我们的项目申请页面进行注册，以完成报名和参与流程。您可能被要求再次提供最初由您的推荐人提供给我们的个人数据，以及项目（研学）注册所需的其他信息（个人数据）。

Personal data of others provided by you

您提供的他人的个人信息

In situations where you provide us with the personal data of others, it becomes your responsibility to inform the individual(s) concerned about the processing of their personal data for the relevant purposes and to confirm to us that you have been authorized to submit such details with us for processing as necessary.

在您向我们提供他人个人数据的情况下，您有责任告知相关个人我们将出于相关目的处理他们的个人数据，并向我们确认您已被授权向我们提交此类详细信息，以便我们进行必要的处理。

Personal data collected via tracking technologies

通过跟踪技术收集的个人数据

When you visit our website or use our service, we and third parties may use cookies and other tracking technologies to collect personal data from you. This may include tracking your activities across time and third-party sites or services. For more information about this processing and your choices regarding it, see our [Cookie Notice](#).

当您访问我们的网站或使用我们的服务时，我们和第三方可能会使用 cookie 和其他跟踪技术来收集您的个人数据。这可能包括跨时间和第三方网站或服务跟踪您的活动。有关此类处理的更多信息以及您的相关选择，请参阅我们的 Cookie 通知。

Why do we collect your personal data?

我们为什么要收集您的个人数据？

Purpose(s) of processing

数据处理的目的

Emeritus uses the personal data that we collect for the following purposes:

易睿拓思将收集到的个人数据用于以下目的：

- i. Creating an account to apply and register for the study trip
创建账户以申请和注册研学项目
- ii. Group management and seat reservation for the study trip
研学项目的团队管理和席位预订
- iii. Fulfilling orders, processing payments, and preventing transactional fraud
履行订单、处理付款和防止交易欺诈

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- iv. Responding to your doubts, queries, and requests
答复您的疑问、询问和要求
- v. Verifying documentation related to identity and age
核实与身份和年龄有关的文件
- vi. Trip management, which includes planning and organizing travel logistics, accommodations, and educational activities
出行管理，包括规划和组织出行安排协调、住宿和教育活动
- vii. Communicating important trip details and sharing related materials
传达重要的出行细节并共享相关材料
- viii. Ensuring the safety and well-being of the participants during the study trip by managing medical needs, dietary restrictions, and emergencies
通过管理医疗需求、饮食限制和紧急情况，确保研学项目期间参与者的安全和待遇
- ix. Ensuring compliance with applicable child protection policies of the concerned university partner
确保遵守相关大学合作伙伴适用的儿童保护政策
- x. Monitoring and improving our services and internal operations related to study trips
监测和改进我们与研学项目相关的服务和内部运作
- xi. Training our workforce/employees on different processes related to study trips
对我们的工作人员/员工进行与研学项目相关的各种流程的培训
- xii. Conducting business analytics, marketing research, and data analysis for business planning, marketing, advertising, and sales efforts
为业务规划、营销、广告和销售工作进行业务分析、营销研究和数据分析
- xiii. Sending surveys for receiving feedback and suggestions for enhancing the overall quality of the study trip program
发送调查问卷，收集反馈意见和建议，以提高研学项目的整体质量
- xiv. Sanction checks/screening in compliance with applicable sanction laws across geographies and similar programs of the university partners (for example, sanctions list of the Office of Foreign Assets Control)
根据适用的跨地域制裁法律和大学合作伙伴的类似程序（例如，外国资产控制办公室的制裁清单）进行制裁检查/筛选
- xv. Investigating and addressing complaints and issues
调查和处理投诉和问题
- xvi. As required under the applicable law(s) to fulfill our legal or regulatory obligation
根据适用法律的要求，履行我们的法律或监管义务
- xvii. Any other purpose as disclosed to you at the point of collection
在收集信息时向您披露的任何其他目的

Lawful (legal) basis for processing

数据处理的合法（法律）依据

Privacy law of certain jurisdictions requires that one of the available lawful bases of processing, as prescribed by such privacy law, must be relied upon (satisfied) by Emeritus before processing your personal data for each of the purposes listed earlier. The lawful basis that Emeritus relies upon for a particular processing activity may differ from the lawful basis relied upon for another processing activity i.e., different lawful bases may be relied upon to lawfully conduct different processing activities.

某些司法管辖区的隐私法律规定，易睿拓思在处理您的个人数据用于前面列出的每个目的之前，必须依赖（满足）该隐私法律规定的适用的合法处理的依据之一。易睿拓思为某一特定数据处理活动所依据的法律依据可能不同于为另一数据处理活动所依据的法律依据，即可能依据不同的法律依据合法地进行不同的数据处理活动。

All or some of the following lawful bases of processing may be available under the privacy law of a particular jurisdiction (country):

根据特定司法管辖区（国家）的隐私法律，可以使用以下全部或部分数据合法处理的依据：

- 1. Consent:** You have given consent (explicit/express or deemed/implied, depending upon the privacy law applicable) to the processing of your personal data for one or more specific purposes.
同意：您已同意（明确/明示或视为/默示，取决于适用的隐私法律）为一个或多个特定目的的处理您的个人数据。
- 2. Performance of a contract:** Processing of your personal data is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
履行合同：为履行您作为一方当事人的合同，或在签订合同前应您的要求采取措施，有必要处理您的个人数据。
- 3. Compliance with legal obligation:** Processing is necessary for compliance with a legal obligation to which Emeritus is subject.
履行法律义务：为履行易睿拓思所承担的法律义务，有必要进行数据处理。
- 4. Protection of vital interests:** Processing is necessary in order to protect your vital interests or those of another natural person.
保护重要利益：为保护您或其他自然人的重要利益，有必要进行数据处理。
- 5. Public interest:** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
公共利益：为公共利益执行任务或行使赋予控制者的官方权力而必须进行处理。
- 6. Legitimate interest:** Processing is necessary for the purposes of the legitimate interests pursued by Emeritus or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms under applicable data protection laws.

合法利益：出于易睿拓思或第三方追求合法利益的目的，有必要进行数据处理，但根据适用的数据保护法，您的利益或基本权利和自由优先于此类利益的情形除外。

Where Emeritus wishes to use your personal data for a new purpose that has not been mentioned above, Emeritus will process your personal data, for such new purpose, as per the provisions of the applicable privacy law(s). Where required, Emeritus will notify you of the new purpose in accordance with the applicable law(s) and obtain your consent (or rely on any other lawful basis available with us) before processing your personal data for the new purpose.

如果易睿拓思希望将您的个人数据用于上述未提及的新目的，易睿拓思将根据适用隐私法律的规定，为该新目的处理您的个人数据。如有需要，易睿拓思将根据适用法律通知您新的目的，并在为新目的处理您的个人数据之前，征得您的同意（或依据我们现有的任何其他合法依据）。

Consent as the lawful (legal) basis for processing – additional information

同意作为数据处理的合法（法律）依据 - 补充信息

Where the collection and use of your personal data is based on your consent, you are entitled to withdraw that consent at any time by contacting us (please refer to the ‘Contact Us’ section of this Notice). Please note that your withdrawal of consent can have an adverse impact on our ability to engage with you and would not affect the lawfulness of processing that has already occurred based on your consent.

如果收集和使用您的个人数据是基于您的同意，您有权随时联系我们（请参阅本通知的“联系我们”部分）撤回同意。请注意，撤回同意可能会对我们与您的合作产生不利影响，且不会影响基于您的同意已经进行的数据处理的合法性。

With whom do we share your personal data (Disclosure)?

我们与谁共享您的个人数据（披露）？

Disclosure within the Emeritus group of companies (affiliates)

在易睿拓思集团（关联公司）内披露信息

Emeritus is a global company, and we may share your or your child’s personal data with other companies within the Emeritus group that act as affiliate service providers to facilitate study trip services you have registered for. This Notice also applies to the data processing activities of our affiliates, who may act as controllers of your personal data in such contexts. It is provided on behalf of these affiliates, including those listed in Annexure-1 of this Notice.

易睿拓思是一家全球性公司，我们可能会与易睿拓思集团内作为附属服务提供商的其他公司共享您或您子女的个人数据，以便为您注册的研学项目服务提供便利。本声明也适用于我们关联

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公司的数据处理活动，在这种情况下，关联公司可能成为您个人数据的控制者。本声明是代表这些关联公司（包括本通知附件-1 中列出的关联公司）提供的。

Disclosure to third-party service providers

向第三方服务提供商披露

Emeritus may share your or your participating child's personal data with the following third-party service providers. These third-party service providers will require access to your and your participating child's personal data to perform certain limited functions for Emeritus however, they may not generally use, for their own purposes, such personal data that they process:

易睿拓思可能会与以下第三方服务提供商共享您或您的子女的个人数据。这些第三方服务提供商需要访问您和您的参与子女的个人数据，以便为易睿拓思履行特定的职能，但是，他们一般不得将其处理的个人数据用于自己的目的：

- Technology service providers like network and IT security, internet services, video communications, customer support and communication, telecom services for running the business operation and protecting it from external and internal threats
技术服务提供商，如网络和 IT 安全、互联网服务、视频通信、客户支持和通信、电信服务等，以运行业务运营并保护其免受外部和内部威胁。
- Travel agents and visa processing agents
旅行社和签证办理机构
- Local transportation providers like cab service providers
当地交通服务提供商，如出租车服务提供商
- Service providers for travel and accommodation arrangements, trip planning, and managing the execution of various activities tailored to the study trip
提供旅行和住宿安排、行程规划以及管理为研学项目量身定制的各种活动的执行的服务提供商
- Service providers and platforms supporting our outreach initiatives and assisting us in establishing communication (with you) through various channels like email, text (SMS), WhatsApp, voice call, etc.
通过电子邮件、短信、WhatsApp、语音电话等各种渠道，支持我们的推广活动并协助我们与您建立联系的服务提供商和平台。
- Service providers providing the following services:
提供以下服务的服务提供商：
 - Business analytics
业务分析
 - Marketing research

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市场调研

- Data collection forms (e.g., Google Forms)
数据收集表（如谷歌表单）
 - Focus groups, surveys, and data analysis
焦点小组、调查和数据分析
 - Cloud services and data storage
云服务和数据存储
 - Credit facilities and payment processing
信贷机制和付款处理
 - Couriers
快递
- Social media platforms (for example, Facebook, LinkedIn) for assisting us with our social media marketing initiatives
社交媒体平台（如 Facebook、LinkedIn），用于协助我们开展社交媒体营销活动
 - Service providers conducting sanction checks and screening
进行制裁检查和筛选的服务提供者
 - Third-party service providers for establishing and implementing whistleblower program by setting-up and independently managing hotline and web portal for collecting whistleblower reports (anonymous or identified)
第三方服务提供商，通过设立和独立管理热线电话和门户网站来收集举报人的举报（匿名或身份确认），从而建立和实施举报人计划

We take reasonable steps, such as obtaining contractual commitments from our third-party service providers, to limit the use of and protect your and your participating child's personal data by our service providers. We take appropriate measures to ensure that the confidentiality of your or your child's personal data is maintained and it is used solely for authorized purposes.

我们会采取合理的措施，例如获得第三方服务提供商的合同承诺，以限制我们的服务提供商使用并保护您和您参与活动的子女的个人数据。我们会采取适当措施，确保您或您子女的个人数据保密，且仅用于授权目的。

Disclosure to other third parties

向其他第三方披露

Emeritus may share your personal data with the following (non-agent) third parties (list not exhaustive):

易睿拓思可能会与以下（非代理）第三方共享您的个人数据（列表未穷尽）：

- Professional advisors and consultants including law firms, tax consultants, business/management consultants, auditors etc. for running the operations efficiently and in a compliant manner

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专业顾问和咨询师，包括律师事务所、税务咨询师、商业/管理咨询师、审计师等，以便高效、合规地开展业务

- Regulators, government bodies, supervisory authorities, and law enforcement agencies in order to comply with applicable laws, rules and regulations including those related to audit and assessment of educational programs, licensing and approvals, and revenue and taxation

监管机构、政府机构、监督机构和执法机构，以遵守适用的法律、法规和规章，包括与教育项目的审计和评估、许可和审批以及税收相关的法律、法规和规章

- Hotels and airlines to make arrangements during the study trip
研学项目期间的酒店和航空公司安排
- Prospective (and actual) sellers or buyers and their advisers in connection with any financing, merger, acquisition or sale of any of our business or assets
与我们任何业务或资产的融资、合并、收购或出售有关的潜在（和实际）卖方或买方及其顾问
- Data collection forms (e.g., Google Forms) where Emeritus shall provide only your contact detail (generally only the email address) to trigger the notification and the link to the form. Personal data provided via the said form may be also available to the third-party providing the service and you are advised to read the privacy notice (policy) and terms & conditions of the third-party before entering any personal data into the form.

数据收集表单（如谷歌表单），易睿拓思仅提供您的联系方式（一般仅提供电子邮件地址）以触发通知和表单链接。通过上述表格提供的个人数据也可能提供给提供服务的第三方，建议您在向表单输入任何个人数据之前，阅读第三方的隐私声明（政策）和条款。

In addition to the above, Emeritus also shares your and your participating child’s personal data, more specifically, as stated, with the following third parties:

除上述情况外，易睿拓思还与以下第三方共享您和您参与项目的子女的个人数据，详情如下：

Recipients 接收方	Categories of personal data 个人数据类别	Why we share (Purpose) 我们为何共享（目的）
University partners 大学合作伙伴		
University partner associated with the study trip you have enrolled for.	<ul style="list-style-type: none"> • Identification/Identity data 身份识别/身份数据 • Contact details 联系信息 • User-generated data 	<ul style="list-style-type: none"> • Planning, collaboration, and other academic activities related to the study trip

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<p>与您报名参加的研学项目相关的大学合作伙伴。</p> <p>Please note that since the university partners operate independently, their privacy notice/policy shall apply to their processing of your personal data.</p> <p>请注意，由于大学合作伙伴是独立运营的，他们的隐私声明/政策将适用于他们对您个人数据的处理。</p> <p>We recommend reviewing the university partner’s privacy notice for a clear understanding of how your data is collected, used, stored, and protected by them during the study trip.</p> <p>我们建议您查看大学合作伙伴的隐私声明，以清楚了解他们在研学项目期间如何收集、使用、存储和保护您的数据。</p>	<p>用户生成数据</p> <ul style="list-style-type: none"> • Other personal details 其它个人信息 	<p>与研学项目有关的计划、合作和其他学术活动</p> <ul style="list-style-type: none"> • Verifying documentation related to your identity 核实与您身份有关的文件 • Issuing and maintaining the credential(s), if applicable 发放和维护证书，如适用 • Regulatory reporting 监管报送 • Audit 审计
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We share your personal data with the (non-agent) third parties primarily for the performance of contract between you and Emeritus but may also rely upon one of the other lawful bases, listed under the section ‘Lawful (legal) basis for processing’, that may be legally available to us. Where required by the applicable privacy law(s), we will seek your consent before sharing your personal data with the parties. Third parties with whom your personal data has been shared may, in some cases, independently determine the purposes and uses of your personal data; in such cases, that third party recipient’s own privacy policy (notice) will govern their use of your personal data.

我们与（非代理）第三方共享您的个人数据，主要是为了履行您与易睿拓思之间的合同，但也可能依赖于“处理的合法（法律）依据”一节中所列的其他合法依据之一。在适用的隐私法律要求的情况下，我们将在与各方共享您的个人数据之前征得您的同意。在某些情况下，与我们共享您的个人数据的第三方可能会独立决定您的个人数据的目的和用途；在这种情况下，第三方接收方自己的隐私政策（通知）将对他们使用您的个人数据作出规定。

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Disclosure without notification

未经通知而披露

In some cases, or circumstances, we may disclose your or your participating child's personal data to third parties without notifying you. These circumstances could include:

在某些情况下，我们可能会在不通知您的情况下向第三方披露您或您参与项目的子女的个人资料。这些情况可能包括：

- Where Emeritus is required to do so as per applicable laws/rules/regulations, or by order of a court, tribunal, or any other regulatory authority, or other legal process or compulsion.
易睿拓思根据适用法律/规则/条例，或法院、法庭或任何其他监管机构的命令，或其他法律程序或强制要求必须这样做。
- Where Emeritus, in good faith, believes that such disclosure is reasonably necessary to comply with a legal obligation, process, order, or request.
易睿拓思基于诚实信用认为，为遵守法律义务、程序、命令或要求，披露信息是合理必要的。
- Where Emeritus is legally required to or believes in good faith that such disclosure is reasonably necessary to safeguard the rights, property or other interests of Emeritus, its employees, vendors, clients, customers of clients, third parties or the public as required and permitted by the applicable law(s).
法律要求或易睿拓思基于诚实信用认为，根据适用法律的要求和允许，为保护易睿拓思、其员工、供应商、客户、客户的客户、第三方或公众的权利、财产或其他利益，披露信息是合理必要的。
- Where provision of the information would be disproportionate or would result in the impossibility or serious impairment of achieving the objectives of processing.
已提供的信息与实际情况不相符，或导致无法实现或严重损害处理信息的目的。

International (cross-border) transfer of personal data

个人数据的国际（跨境）转移

Due to the global nature of our business, which comprises partnerships with various universities across the globe with international enrolments to the courses and programs offered, presence of several Emeritus group companies (affiliates) worldwide, vendors/service providers (processors) that are present in and operating out of different countries and facilitate and support our services, and other third parties (esp. those listed in the earlier section) established in an overseas location, your and your participating child's personal data may be shared, disclosed, or transferred to these parties in other countries where the privacy and data protection law(s) may differ from those in your country. These cross-border data transfers are necessary to facilitate the study trip. The cross-border transfer may

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include transfers to third countries (including onward transfers) that are not covered by the adequacy decision of the European Commission (Secretary of State in the case of the UK).

由于我们的业务具有全球性，包括与全球多所大学合作，提供国际注册课程和项目，在全球范围内拥有多家易睿拓思集团公司（关联公司），在不同国家开展业务并为我们的服务提供便利和支持的供应商/服务提供商（处理商），以及在海外设立的其他第三方（尤其是上一节列出的第三方）。您和您参与项目的子女的个人数据可能会被共享、披露或传输给其他国家的第三方，而这些国家的隐私和数据保护法律可能与您所在的国家不同。这些跨境数据传输对于推进研学项目是必要的。跨境转移可能包括向第三国的转移（包括继续转移），这些转移不在欧盟委员会（英国为国务大臣）的充分性决定范围内。

The cross-border transfer of your personal data shall be done in compliance with the concerned provisions and requirements of the privacy law(s) applicable to your personal data, which may include providing for appropriate safeguards in the form of Standard Contractual Clauses (SCCs) signed with the recipient of your personal data.

由于我们的业务具有全球性，包括与全球多所大学合作，提供国际注册课程和项目，在全球范围内拥有多家易睿拓思集团公司（关联公司），在不同国家开展业务并为我们的服务提供便利和支持的供应商/服务提供商（处理商），以及在海外设立的其他第三方（尤其是上一节列出的第三方）。您和您参与项目的子女的个人数据可能会被共享、披露或传输给其他国家的第三方，而这些国家的隐私和数据保护法律可能与您所在的国家不同。这些跨境数据传输对于推进研学项目是必要的。跨境转移可能包括向第三国的转移（包括继续转移），这些转移不在欧盟委员会（英国为国务大臣）的充分性决定范围内。

How long do we retain your personal data?

我们会将您的个人数据保留多长时间？

Emeritus will retain your and your participating child's personal data for as long as necessary for the purpose(s) for which it has been collected, in accordance with the applicable law(s) and as set out in our retention policy and/or schedule. The duration for which we retain your and your child's personal data may differ depending upon the purpose(s) for which it's being processed.

易睿拓思将根据适用法律以及我们的保留政策和/或附表中规定的时间，在收集目的所需的时间内保留您和您参与儿童的个人数据。我们保留您和您孩子个人数据的期限可能因处理目的而异。

We determine the appropriate retention period for personal data by considering several factors, including the amount, nature, and sensitivity of the data, the risk of harm from unauthorized use or disclosure, the purposes and means for which the data is processed, and applicable legal requirements.

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我们通过考虑多个因素来确定个人数据的适当保留期限，包括数据的数量、性质和敏感性、未经授权使用或披露造成的损害风险、处理数据的目的和方式以及适用的法律要求。

We will retain and use your and your participating child's personal data to the extent necessary to comply with our legal obligations, for example, to comply with statutory audits, resolve disputes, comply with orders or requests issued by the competent court(s), and enforce our legal agreements and policies.

我们将在履行我们的法律义务所需的范围内保留和使用您和您的参与儿童的个人数据，例如，遵守法定审计、解决争议、遵守主管法院发布的命令或要求，以及执行我们的法律性质的协议和政策。

In some circumstances we may anonymize your personal data so that it can no longer be associated with you or your child, in which case we may use such information without further notice to you.

在某些情况下，我们可能会对您的个人数据进行匿名化处理，使其不再与您或您的孩子相关联，在这种情况下，我们可能会使用此类信息，恕不另行通知。

How do we protect your personal data (Data Security)?

我们如何保护您的个人数据（数据安全）？

Emeritus implements appropriate technical and organizational measures to ensure the security of your and your child's personal data and to ensure the ongoing confidentiality, integrity, availability, and resilience of processing systems and services. These measures are designed to prevent accidental or unlawful destruction, loss, alteration, or unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed by us.

易睿拓思将实施适当的技术和组织措施，以确保您和您孩子的个人数据的安全，并确保处理系统和服务的持续机密性、完整性、可用性和弹性。这些措施旨在防止我们传输、存储或以其他方式处理的个人数据发生意外或非法破坏、丢失、更改或未经授权的披露或访问。

We make every reasonable effort to ensure the safety and security of your and your participating child's personal data in accordance with the applicable law(s) and industry standards while considering the state of the art, the costs of implementation, and the nature, scope, context, and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons. In addition, we limit access to your or your participating child's personal data to those employees, agents, contractors who have a business need to access such personal data. They will only process your or your participating child's personal data on our instructions, and they are subject to a duty of confidentiality.

我们会根据适用法律和行业标准，尽一切合理努力确保您和您参与的儿童的个人数据的安全，同时考虑技术水平、实施成本、处理的性质、范围、背景和目的，以及自然人的权利和自由面临

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不同可能性和严重性的风险。此外，我们仅允许因业务需要访问您或您参与儿童的员工的个人数据、代理人、承包商访问此类个人数据。他们只会按照我们的指示处理您或您参与活动的儿童的个人信息，并且他们有保密义务。

In the unlikely event of a personal data breach, we will assess and investigate the event and take necessary actions, including those related to notification to the relevant supervisory authority and to the individuals impacted, in compliance with the applicable law(s) within the timelines prescribed.

万一发生个人信息泄露事件，我们将根据适用法律，在规定的时间内评估和调查事件，并采取必要措施，包括通知相关监管机构和受影响的个人。

What are your rights with respect to your personal data?

您在个人信息方面有哪些权利？

Privacy laws in some jurisdictions, especially those in the European Economic Area (EEA) and the United Kingdom (UK), and in some U.S. states, provide individuals with certain rights in relation to the processing of their personal data (subject to conditions and exceptions provided in such laws). These rights are jurisdiction-specific and may not be available to all.

某些司法管辖区的隐私法律，尤其是欧洲经济区（EEA）和英国（UK）以及美国某些州的隐私法律为个人提供了与处理其个人信息相关的某些权利（受此类法律规定的条件和例外情况的约束）。这些权利因司法管辖区而异，可能并非适用于所有人。

- **Right of access:** to obtain from us a confirmation as to whether or not personal data concerning you are being processed.
访问权：要求我们确认是否正在处理与您有关的个人信息。
- **Right to rectification:** to get the inaccurate personal data corrected or rectified, and incomplete personal data completed.
更正权：更正或纠正不准确的个人信息，并补充不完整的个人信息。
- **Right to erasure:** to have the personal data deleted (this is not an absolute right and is subject to exemptions available under the applicable privacy law).
删除权：删除个人信息（这不是绝对权利，受适用隐私法律规定的豁免约束）。
- **Right to restriction of processing:** to obtain restriction of processing.
限制处理权：获得处理限制。
- **Right to data portability:** to receive the personal data concerning you, which you have provided to us, in a structured, commonly used, and machine-readable format and have it transmitted to another controller.
数据转移权：以结构化、常用和机器可读的格式接收您提供给我们的有关您的个人信息，并将其传输给另一个控制者。

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- **Right to object** on grounds relating to your particular situation especially where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
反对权： 基于与您的特定情况相关的理由，特别是当我们依赖合法利益（或第三方的合法利益）时，并且您的特定情况使您想要反对基于此理由的数据处理。
- **Right to object to automated decision making and profiling:** to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you.
反对自动决策和分析的权利： 不受会对您产生法律影响的仅基于自动处理（包括分析）的决定的约束。

We will process your request to exercise the above rights in accordance with the law(s) applicable in relation to the rights exercised by you. As permitted by applicable law, we may refuse requests that are unreasonably repetitive, require disproportionate technical effort, risk the privacy of others, may compromise an ongoing investigation, or are impractical. We do not discriminate against you for exercising any of your rights in a manner that would violate applicable law.

我们将根据与您行使的权利相关的适用法律处理您行使上述权利的请求。在适用法律允许的情况下，我们可能会拒绝不合理重复、需要不成比例的技术努力、危及他人隐私、可能影响正在进行的调查或不切实际的请求。我们不会因您以违反适用法律的方式行使您的任何权利而歧视您。

To exercise a data subject right or make an inquiry about your personal data, please write to us at privacy@emeritus.org. We may need to verify and confirm your identity before we process and fulfill your request. This is another appropriate security measure to protect your and your child's personal data.

要行使数据主体权利或查询您的个人数据，请写信给我们 privacy@emeritus.org。在处理 and 满足您的请求之前，我们可能需要验证和确认您的身份。这是保护您和您孩子个人数据的另一种适当安全措施。

Right to complain: You may have the right to lodge a complaint with your local data protection authority about our processing of your personal data. For more information, please contact your local data protection authority. We would, however, welcome the opportunity to discuss, address, and resolve your concerns before you reach out to your local data protection authority. So, please contact us in the first instance at privacy@emeritus.org.

投诉权： 您有权就我们处理您的个人数据向当地数据保护机构提出投诉。有关更多信息，请联系您当地的数据保护机构。但是，我们希望有机会在您联系当地的数据保护机构之前讨论、触达和解决您的问题。因此，请首先通过 privacy@emeritus.org 与我们联系。

Children's privacy

儿童隐私

We are committed to protecting children's personal data and privacy in all our study trip programs. Personal data collected from children is handled in compliance with applicable data protection laws, ensuring it is used solely for organizing and managing study trips. We take special precautions to safeguard this data, including obtaining parental or guardian consent where required and implementing strict security measures to prevent unauthorized access or misuse.

我们致力于在所有研学项目中保护儿童的个人信息和隐私。从儿童那里收集的个人信息将按照适用的数据保护法进行处理，确保其仅用于组织和管理研学项目。我们采取特别预防措施来保护这些数据，包括在需要时获得父母或监护人的同意，并实施严格的安全措施以防止未经授权的访问或滥用。

We understand that our study trip services can be availed by children (as described earlier in this Notice) and need special safeguards and privacy protection; we do not knowingly permit a child to provide us with personal data without obtaining a parent's or guardian's verifiable consent, except where (as applicable under the relevant laws):

我们理解，儿童可以使用我们的研学项目服务（如本声明前面所述），并且需要特殊的保护和隐私保护；我们不会在未获得父母或监护人可证实的同意的前提下故意允许儿童向我们提供个人信息，除非（根据相关法律适用）：

- The sole purpose of collecting the name or contact information of a parent/guardian or a child is to provide a notice and obtain parental consent
收集父母/监护人或儿童姓名或联系信息的唯一目的是提供通知并征得父母同意
- the sole purpose of collecting personal data from a child is to respond directly, on a one-time basis, to a specific request from the child and where such information is not used to re-contact the child or for any other purpose, is not disclosed, and is deleted by us promptly after responding to the child's request during the study trip
收集儿童个人资料的唯一目的是直接、一次性地回应儿童提出的具体要求，且此类信息不会用于再次联系儿童或用于任何其他目的，不会被披露，并在回应儿童在研学项目期间提出的要求后立即被我们删除
- the purpose of collecting a child's and a parent's name and contact information, is to protect the safety of a child, and where such information is not used or disclosed for any purpose unrelated to the child's safety
收集儿童及家长姓名和联系信息的目的是保护儿童的安全，且此类信息不会用于或披露于与儿童安全无关的任何目的
- otherwise permitted or required by law
法律允许或要求的其他情况

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We adopt stringent measures to safeguard children's data, restricting access to authorized personnel and regularly reviewing our security protocols. Parental or guardian consent is obtained wherever required by law, and we ensure transparency regarding how the data will be used in accordance with this Notice.

我们采取严格的措施保护儿童数据，限制授权人员访问，并定期审查我们的安全协议。在法律要求的情况下，我们会征得家长或监护人的同意，并确保根据本通知使用数据的透明度。

Parental consent and control

父母的同意和控制

For children, we obtain verifiable parental consent before collecting personal data. Parents/guardians can:

对于儿童，我们在收集个人数据前会先征得家长的同意。家长/监护人可以

- Review the personal data collected about their child
查看所收集的有关其子女的个人资料
- Request deletion of their child's data
要求删除子女的数据
- Refuse to further collect or process of your child's personal data by contacting us at privacy@emeritus.org
拒绝进一步收集或处理您孩子的个人数据，请联系我们：privacy@emeritus.org

Contact us

联系我们

Any questions, concerns, or complaints about the operation of this Notice can be addressed to the Data Protection Officer at privacy@emeritus.org. In addition, you may submit your concerns or complaints about our privacy practices to our Data Protection Officer at privacy@emeritus.org or at the following address:

如对本通知的操作有任何问题、疑虑或投诉，请发送电子邮件至 privacy@emeritus.org 与数据保护官联系。此外，您也可以通过 privacy@emeritus.org 或以下地址向我们的数据保护官提交您对我们隐私保护措施的疑虑或投诉：

Emeritus Institute of Management
78 Shenton Way,
#20-02 Singapore-079120

Whenever we receive a formal complaint, we attempt to contact the complainant individually and resolve his/her grievances and/or concerns truthfully and with utmost transparency.

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每当我们收到正式投诉时，我们都会尝试单独联系投诉人，以最大的透明度如实解决他/她的不满和/或关切。

In addition to contacting us, in certain countries you have the right to lodge a complaint with your local data protection authority if you so choose.

除了联系我们之外，在某些国家，如果您愿意，还有权向当地数据保护机构投诉。

In case you are located in the European Union (EU) or United Kingdom (UK), you may contact our representative in the EU or UK:

如果您位于欧盟（EU）或英国（UK），您可以联系我们在欧盟或英国的代表：

Global Alumni (for the EU)

全球校友会（欧盟）

- by emailing 通过电子邮件: EURep@Emeritus.org
- by writing to Global Alumni at Calle Acanto, 11, 28045, Madrid, Spain 请致函全球校友会（地址： Calle Acanto, 11, 28045, Madrid, Spain）

EIM Learning UK Ltd. (for UK 英国)

- by emailing 通过电子邮件: UKRep@Emeritus.org
- by writing to EIM Learning UK Ltd. at WeWork, 10 York Road, London, England, SE1 7ND 请致函 EIM Learning UK Ltd.（地址： WeWork, 10 York Road, London, England, SE1 7ND）

Definitions

定义

In this Notice, the following terms (whether or not capitalized) shall have the meanings set out below and cognate terms shall be construed accordingly:

在本声明中，以下术语（无论是否大写）具有如下含义，同义术语应相应解释：

Personal data means any data related to an identified or identifiable living natural person, provided, however, that if an applicable law has a different definition of personal data (or a similar term referring to information relating to an individual), such definition shall be applied to the extent applicable.

个人数据是指与已识别或可识别的在世自然人有关的任何数据，但如果适用法律对个人数据（或与个人相关信息的类似术语）有不同的定义，则应在适用范围内适用该定义。

Sensitive personal data (SPD) means personal data which is more significantly related to the notion of a reasonable expectation of privacy. However, data may be considered more or less sensitive depending on context or jurisdiction.

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敏感个人数据 (SPD) 是指与合理的隐私期望概念有较大关系的个人数据。不过，根据具体情况或司法管辖区的不同，数据的敏感程度也有高有低。

Process and Processing means (1) any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, accessing, consultation, interpretation, assessment, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction; and (2) any other action that may be taken with respect to personal data.

处理和加工是指：（1）对个人数据进行的任何操作或一系列操作，无论是否采用自动方式，例如收集、记录、组织、存储、改编或更改、检索、访问、咨询、解释、评估、使用、通过传输、传播或以其他方式提供而披露、排列或组合、阻止、删除或销毁；（2）可能对个人数据采取的任何其他行动。

(Data) Controller means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data.

（数据）控制者是指单独或与他人共同决定处理个人数据的目的和方式的自然人或法人、公共当局、机构或任何其他机构。

(Data) Processor means a natural or legal person (other than an employee of the controller), public authority, agency or other body which processes personal data on behalf of the controller.

（数据）处理者是指代表控制者处理个人数据的自然人或法人（控制者的雇员除外）、公共当局、机构或其他团体。

Global study and research programs or study trips are the tailored programs organized by Emeritus which include components such as company visits, theme courses, interactive seminars with speakers, guest lectures, cultural immersions, and activity-based excursions.

全球学习和研究项目或研学项目是由易睿拓思组织的定制项目，包括公司参观、主题课程、与演讲者的互动研讨会、客座讲座、文化浸润和基于活动的游览等内容。

Child and Children means individuals (minors) under a certain age (age of majority) as defined and notified under the applicable laws, including the privacy laws, of the country of residence of the child or the country of origin their personal data, as applicable.

儿童和儿童们指根据适用法律（包括儿童居住国或其个人数据来源国的隐私法律）定义和声明的未满一定年龄（成年年龄）的个人（未成年人）。

Adequacy decision means a formal decision made by the European Union (EU) which recognises that another country, territory, sector or international organisation provides an equivalent level of protection for personal data as the EU does.

充分性决定是指欧盟（EU）做出的正式决定，承认另一个国家、地区、部门或国际组织为个人数据提供了与欧盟同等水平的保护。

Onward transfer means a transfer of personal data to a fourth party or beyond. For instance, the first party is the data subject (you), the second party is the controller (Emeritus), the third party is the processor, and the fourth party is a sub-contractor of the processor.

转发是指将个人数据转发给第四方或更多方。例如，第一方是数据主体（您），第二方是控制方（易睿拓思），第三方是处理方，第四方是处理方的分包商。

Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

个人数据泄露是指违反安全规定，导致传输、存储或以其他方式处理的个人数据被意外或非法破坏、丢失、更改、未经授权披露或访问。

University partners mean the universities on whose behalf we deliver and manage the respective educational programs including the study trips.

大学合作伙伴是指我们代表其提供和管理相应教育项目（包括研学项目）的大学。

Annexure-1 附件-1

List of Affiliates

关联公司清单

Name 公司名称	Jurisdiction 所在地	Organizational ID 组织机构代码
Eruditus Learning Solutions Pte Ltd	Singapore 新加坡	201230726W
Eruditus Executive Education FZ-LLC	UAE 阿拉伯联合酋长国	91917

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EIM Learning S.C.	Mexico 墨西哥	ELE2103084DA
Emeritus Institute of Management, Inc.	USA 美国	6959273
Emeritus Institute of Management Pte. Ltd.	Singapore 新加坡	201510637C
Erulearning Solutions Pvt. Ltd.	India 印度	U80904MH2016PTC288248
Emeritus Enterprise, Inc.	USA 美国	6595607
Emeritus Institute of Management DO Brasil Ltda	Brazil 巴西	46.284.205/0001-47
EIM Learning UK Ltd.	UK 英国	11617490
Eruditus Education Technology (Shanghai) Co., Ltd. 哲藤教育科技（上海）有限公司	P.R.China 中华人民共和国	91310000MA1FYJ5YXB
Shanghai Zeteng Education Technology Co., Ltd. 上海择藤教育科技有限公司	P.R.China 中华人民共和国	91310106MA1FYJQL7L
Wuhan Emeritus Education Technology Company Limited 武汉易睿拓思教育科技有限公司	P.R.China 中华人民共和国	91420100MABPU91E9G