

子女附属卡申请表

Application Form for Children Supplementary Card

一般须知 Note:

1.八周岁以下的会员子女可进行系统登记。

Children under the age of 8 may pre-register in the system.

2. 八至二十一周岁的会员子女可申办子女附属卡(人民币120元/年),同时阁下可为十二至二十一周岁的子女 开通下列北京香港马会会所有限公司设施的签账权。

Children aged from 8 to 21 may apply for child cards at an annual cost of RMB120. You may also grant signing rights to those between the age of 12 and 21 in designated facilities of Beijing Hong Kong Jockey Club Clubhouse Limited.

3.请呈交填写完整的申请表及以下文件副本:身份证件、回乡证、护照、出生证书及一张2寸白底高清证件照。 Please submit the completed application form with copies of the following required documents: ID Card, Mainland Travel Permit, Passport, Birth Certificate and a 2-inch certificate photo (high definition photo with white background).

子女资料 Children Information:			
申办项目 Application Item	适用年龄 Age Range	子女姓名 Name of Child	出生日期(日/月/年) Date of Birth (dd/mm/yyyy)
□ 仅登记 Pre-registration	0-8		
□ 申办子女附属卡 Child Card	8-21		
□ 申办子女附属卡并开通签账权 Child Card with Signing Rights	12-21		
□ 为子女附属卡持有人开通签账权 Apply Signing Rights for Child Cardho	older 12-21		

北京会所签账权益 Beijing Clubhouse Signing Rights:

餐饮设施 Dining Facilities	签账权(年龄)Signing Rights (age)
酒廊 The Lounge、 阅览室 The Library	12~21
康体设施 Recreation Facilities	
更衣室 Changing Rooms、按摩室 Massage Rooms、 游泳池 Swimming Pool、多用途运动室 Multi-purpose Studio、 桑拿及蒸汽浴室 Sauna, Steam、水力按摩池 Whirlpool	12~21
高尔夫球模拟室 Golf Simulator、健身中心 Gym	14~21

注意事项 Important Note:

*子女附属卡持有人签账权只适用于北京香港马会会所有限公司指定场所。享有签账权的子女附属卡持有人可单独使用 以上设施并签账,主卡会员须为其享有签账权之子女附属卡持有人在本会的消费负责。

Children Supplementary Cardholders' signing rights only apply to designated venues of Beijing Hong Kong Jockey Club Clubhouse Limited. Children Supplementary Cardholder with signing rights is able to use the above facilities and sign bill on his/her own. Principal Members are responsible for all charges incurred at the Club by their children holding Children Supplementary Card with signing rights.

*会员须对其子女附属卡持有人之行为负责,并为此承担连带法律责任。

Members are responsible for the conduct of their Children Supplementary Cardholders, and undertake joint and several liabilities for

*子女附属卡不可转让,仅供卡上所示名字及照片的持有人本人使用并需遵守会员设施规则。

Children Supplementary Card is non-transferrable and shall only be used by the person whose name and photo appear(s) on the card and who must observe the rules of the Club at all times in the same manner as a Supplementary Cardholder.

*使用本会设施时必须出示子女附属卡。

Children Supplementary Card must be presented when using Club's facilities.

*仅适用于子女附属卡持有人使用指定设施。不可携带来宾。

Access to eligible facilities is for Children Supplementary Cardholder only. No guests are allowed.

*不接受餐厅预订。Access to eligible restaurants is on walk-in basis only.

*只有父母为主卡会员或配偶附属卡持有人方可报名参加康体活动、教练课程及多用途运动室。

Enrollment for recreational programmes, coaching services and booking of multi-purpose studio can only be done through the parent who is the Principal Member or Spouse Supplementary Cardholder.

*须遵守个别餐饮及康体设施之年龄政策。

Age policy of respective dining venues and leisure facilities apply.

子女附属卡的申请仅适用于已签署并同意《个人信息处理规则》及《儿童个人信息处理规则及监护人须知同意函》

(如适用)的会员及 / 或会员子女。 Application for Children Supplementary Card only applies to Members and/or the Members' children who have signed and consented to the Personal Information Processing Rules and Children's Personal Information Processing Rules and Instructions to Guardians (if applicable).

子女姓名(印于会员卡,连空格在内最多可填写十七	haracters including spaces)
Name (will be printed on the membership card, up to 17 c	请贴照片
	Affix photo here
子女姓名(印于会员卡,连空格在内最多可填写十七 Name (will be printed on the membership card, up to 17 c	haracters including spaces) 请贴照片 Affix photo here
子女姓名(印于会员卡,连空格在内最多可填写十七 Name (will be printed on the membership card, up to 17 c	haracters including spaces) 请贴照片 Affix photo here
阁下提交此表格即视为了解及同意后附的《个人信息处理规则及《会员设施指南》内订明的规例所管辖,本人将承担子女的By submitting this form, you are deemed to have understood and understand that the use of Beijing Clubhouse facilities is governed be hereby accept full responsibility for all charges and liabilities incurred be	村属卡产生的所有费用及责任。 agreed to the details of Personal Information Processing Rules. I by Beijing Clubhouse Bye-Laws and Members' Facilities Directory, I
主卡会员姓名	主卡会员编号
Principal Member's Name	Principal Membership No
主卡会员签署	日期
Principal Member's Signature ————————————————————————————————————	— Date ————————————————————————————————————



儿童个人信息处理规则及监护人须知同意函

本人已阅读并充分理解《儿童个人信息处理规则及监护人须知》("处理规则")的全部内容与条款。本人在下方勾选及签署,表明本人同意北京香港马会会所有限公司为处理规则中所载明之目的、用途及方式等处理本人孩子的个人信息,包括:

- □ 北京香港马会会所有限公司按照处理规则的规定 将本人孩子的个人信息提供给第三方处理
- □ 北京香港马会会所有限公司按照处理规则的规定 处理本人孩子的敏感个人信息
- □ 北京香港马会会所有限公司按照处理规则的规定 将本人孩子的个人信息转移至境外处理

主卡持卡人代 14 岁以下子女签名

Signature of Principal Cardholder (on behalf of child aged 14 below)

Consent Form of Rules on Processing Children's Personal Information and Instructions to Guardians

I have read and fully understood all terms and conditions of *Children's Personal Information Processing Rules and Instructions to Guardians* ("Processing Rules"). By checking and signing below, I consent to the processing of my child's personal information by Beijing Hong Kong Jockey Club Clubhouse Limited for the purposes, uses and in the manner set forth in the Processing Rules, including:

- ☐ the provision of my child's personal information by Beijing Hong Kong Jockey Club Clubhouse Limited to a third party for processing in accordance with the Processing Rules
- ☐ the processing of my child's sensitive personal information by Beijing Hong Kong Jockey Club Clubhouse Limited in accordance with the Processing Rules
- ☐ the cross-border provision of my child's personal information by Beijing Hong Kong Jockey Club Clubhouse Limited for processing in accordance with the Processing Rules

日期

Date



个人信息处理规则同意函

本人已阅读并充分理解《个人信息处理规则》("处理规则")的全部内容与条款。本人在下方勾选及签署,表明本人同意北京香港马会会所有限公司为处理规则中所载明之目的、用途及方式等处理本人的个人信息,包括:

则中所载明之目的、用途及方式等处理本人的个人信息,包括:	of my personal information by Beijing Hong Kong Jockey Club Clubhouse Limited for the purposes, uses and in the manner set forth in the Processing Rules, including:
□ 北京香港马会会所有限公司按照处理规则的规定将本人的个人信息提供给第三方处理□ 北京香港马会会所有限公司按照处理规则的规定处理本人的敏感个人信息□ 北京香港马会会所有限公司按照处理规则的规定将本人的个人信息转移至境外处理	 □ the provision of my personal information by Beijing Hong Kong Jockey Club Clubhouse Limited to a third party for processing in accordance with the Processing Rules □ the processing of my sensitive personal information by Beijing Hong Kong Jockey Club Clubhouse Limited in accordance with the Processing Rules □ the cross-border provision of my personal information by Beijing Hong Kong Jockey Club Clubhouse Limited for processing in accordance with the Processing Rules
主卡持卡人代 14 周岁以上但不满 18 周岁的 子女附属卡持卡人签名 Signature of Principal Cardholder (on behalf of Dependant Cardholder aged 14 or above but under 18)	日期 Date
子女附属卡持卡人签名(18 周岁以上) Signature of Dependant Cardholder (Aged 18 or above)	日期 Date

Consent Form of Personal Information

Processing Rules

I have read and fully understood all terms and conditions of *Personal Information Processing Rules* ("Processing Rules").

By checking and signing below, I consent to the processing



儿童个人信息处理规则及监护人须知

最新版本日期: 2023年6月30日

欢迎阁下访问北京香港马会会所!

北京香港马会会所由北京香港马会会所有限公司("马会")负责运营及管理、北京香港马会会所有限公司是一家根据中华人民共和国("中国"、为本规则之目的、不包括香港特别行政区、澳门特别行政区及台湾地区)法律成立的公司,其注册地址为北京市东城区金宝街 68 号。

马会致力于保护儿童(指未满 14 周岁的未成年人,下同)个人信息的机密和安全,因此,在《个人信息处理规则》的基础上,马会希望通过本《儿童个人信息处理规则及监护人须知》("本处理规则""本规则")说明马会在收集和使用儿童个人信息时对应的处理规则等相关事宜。

如果阁下是儿童,请与阁下的父母或监护人一起阅读《个人信息处理规则》以及本处理规则,并在向马会提供任何个人信息之前征得他们的同意,在他们的同意和指导下使用马会的设施,购买/使用马会的商品及服务。

如果阁下是父母或监护人,并希望向马会提供阁下所照顾的儿童的任何个人信息,请确保在此前阁下已仔细阅读、理解并同意《个人信息处理规则》以及本处理规则。阁下的理解和配合是马会保护阁下孩子的个人信息和隐私安全所必需的可以护阁下孩子的合法权益,马会希望阁下可以协助马会,确保阁下的孩子在阁下的同意和指导。马会将根据本规则采取特殊措施保护马会获得的阁下孩子的个人信息。如果阁下不同意本规则的内容,请阁下要求阁下的孩子立即停止使用马会的设施、购买/使用马会的商品/服务。

在阁下阅读完本处理规则后,如对本处理规则或与本处理规则相关的事宜有任何问题,可通过本处理规则载明的方式联系马会,马会会尽快为阁下作出解答。

本处理规则将帮助阁下了解以下内容:

- 1. 马会如何收集和使用儿童个人信息
- 2. 马会如何共享、转让、公开披露儿童个人信息
- 3. 马会如何存储和跨境转移儿童个人信息
- 4. 马会如何保护儿童个人信息
- 5. 如何管理儿童个人信息
- 6. 处理规则的更改
- 7. 如何联系马会
- 8. 适用语言

Children's Personal Information Processing Rules and Instructions to Guardians

Latest version: 30 June, 2023

Welcome to the Beijing Hong Kong Jockey Club Clubhouse!

Beijing Hong Kong Jockey Club Clubhouse is operated and managed by Beijing Hong Kong Jockey Club Clubhouse Limited, a company incorporated under the laws of the People's Republic of China ("the PRC", for the purpose of the Rules only, excluding Hong Kong Special Administrative Region, Macau Special Administrative Region and Taiwan), with its registered address at No. 68 Jinbao Street, Dongcheng District, Beijing ("the Club", "we", "us" or "our").

The Club is committed to ensuring the security and privacy of the children's personal information (i.e. minors under the age of 14, same hereinafter). Therefore, on the basis of the *Personal Information Processing Rules*, the Club would like to, through this *Children's Personal Information Processing Rules and Instructions to Guardians* ("the Processing Rules" or "the Rules"), explain the handling rules that the Club applies to collect and use children's personal information and other relevant matters.

If you are a child, please read the *Personal Information Processing Rules* and the Rules with your parents or guardians and obtain their consent before providing any personal information to the Club. In addition, you shall use the facilities, purchase/use the goods/services provided by the Club with their consent and guidance.

If you are a parent or guardian and wishes to provide the Club with any personal information about a child in your custody, please ensure that you have previously read and fully understand the Personal Information Processing Rules and the Rules and agree to all terms herein. Your understanding and cooperation are necessary for us to protect the personal information and privacy of your children. In order to safeguard the legitimate rights and interests of your children, we hope that you can assist us to ensure that your children's use of the facilities, purchase/use of goods and services are all within your consent and guidance. We will take special measures to protect the personal information of your children obtained by us according to the Rules. If you do not agree to the Rules, please ask your children to immediately stop using the Club's facilities or purchasing/using the Club's goods/services.

If you have any questions about the Rules or any other relevant matters after you have read it, you may contact the Club through the means provided in the Rules and the Club will provide you with an answer as soon as possible.

The Processing Rules will help you understand the following:

- 1. How we collect and use children's personal information
- 2. How we share, transfer, and publicly disclose children's personal information
- 3. How we store and transfer children's personal information across border
- 4. How we protect children's personal information
- 5. How we deal with children's personal information
- 6. Updates to the Processing Rules
- 7. How to contact us
- 8. Languages
- 1. How we collect and use children's personal information
 - 1.1 Please understand that under certain circumstances, the Club is unable to identify and determine whether the

- 1. 马会如何收集和使用儿童个人信息
 - 1.1 请阁下理解,马会在特定情形下无法识别且无 法判断所处理的个人信息是否属于儿童个人 信息,在该等情况下,马会将严格按照《个 人信息处理规则》的规定处理该等个人信息。
 - 1.2 马会将基于以下目的处理儿童个人信息,为了使马会能够实现这些目的并提供相应的产品和服务,以下列出的个人信息(包括敏感个人信息)是必要的,如果这些个人信息无法提供或不准确,马会可能无法提供相应的产品或服务:

处理目的	马会可能收集的个人信息
(附属卡) 会籍申请及 (附属卡) 会籍管理	姓名、性别、出生日期、国籍、 电邮地址、邮寄地址、住宅地址、 电话号码、国内居住年限、身份 证件类型、身份证件(例如护照、 身份证、回乡证、台胞证、港澳 台身份证)、照片
参加线上/线下(会员) 活动	姓名、年龄、身份证号、护照、 饮食要求或喜好、紧急联系人信 息、个人作品、相片或录影等
处理保险理赔和付款	身份证明文件、银行账号、医疗 记录、支付凭证、账单信息
数据分析	国籍、出生日期、性别

- 1.3 马会为向阁下或者阁下的孩子提供相应的设施、商品及服务之目的,可能还会收集和使用其他儿童个人信息。与此有关的具体使用目的、收集的儿童个人信息的范围请阁下查阅《个人信息处理规则》"马会如何收集和使用阁下的个人信息"章节进行详细了解。
- 2. 马会如何共享、转让、公开披露儿童个人信息
 - 2.1 马会仅在符合适用法律法规和经明确授权同意的情况下共享、转让、公开披露儿童个人信息, 具体请参见《个人信息处理规则》"马会如何 共享、转让、公开披露阁下的个人信息"章节。
 - 2.2 如果需要将儿童个人信息共享至第三方, 马会将评估该第三方收集儿童个人信息的合法性、正当性、必要性。此外, 马会将要求第三方对儿童个人信息采取保护措施, 并且严格遵守相关法律法规与监管要求。 马会会要求接收儿童个人信息的第三方遵守严格的保密义务及采取有效的保密措施, 禁止其将这些儿童个人信息用于未经授权的用途, 并要求第三方依法履行以下义务:
 - (1) 按照法律、行政法规的规定和马会的要求 处理儿童个人信息;
 - (2) 协助马会回应监护人提出的申请及问询;

- personal information processed falls under the scope of children's personal information, in such case, the Club will process such personal information in strict accordance with the Personal Information Processing Rules.
- 1.2 The Club will process children's personal information for the following purposes and the personal information listed below (including sensitive personal information) is necessary to enable the Club to achieve the purposes, and if such personal information is unavailable or inaccurate, the Club may not be able to provide the corresponding products or services:

Purpose of processing	Personal information we may collect
(Supplementary card) membership application and (Supplementary card) membership management	Name, gender, date of birth, nationality, email address, mailing address, residential address, telephone number, lengths of residence in the PRC, types of identity, ID certificates (e.g. passport, ID card, home-visit certificate, Taiwan Compatriot Pass, Hong Kong, Macau and Taiwan ID card), photo
To participate in online/offline (membership) activities	Name, age, ID number, passport, dietary requirements or preferences, emergency contact information, personal artwork, photos or videos, etc.
To process insurance claims and payments	ID documents, bank account, medical records, payment vouchers, billing information
Data analysis	Nationality, date of birth, gender

- 1.3 The Club may collect and use other personal information of your children for the purpose of providing you or your children with the relevant facilities, goods and services. For the specific purposes for such use or scope of the said children's personal information collected for such purposes, please refer to the section titled "How we collect and use your personal information" in the Personal Information Processing Rules.
- 2. How we share, transfer, and publicly disclose children's personal information
 - 2.1 The Club may only share, transfer and publicly disclose children's personal information in compliance with applicable laws and regulations and under your explicit authorisation and consent. You may refer to the section titled "How we share, transfer, and publicly disclose your personal information" in the *Personal Information Processing Rules* for more information.
 - 2.2 If it is necessary to share children's personal information with a third party, the Club will evaluate the legality, legitimacy and necessity of the collection of children's personal information by the third party. In addition, the Club shall require the third party to take measures to protect the children's personal information and strictly abide by the relevant laws and regulations and supervision requirements. The Club will require the third party receiving the children's personal information to comply with strict confidentiality obligations and take effective confidentiality measures so as to prohibit the third party from using the children's personal information for unauthorized purposes, and to require the third parties to comply with the following obligations in accordance with the law:

- (3) 采取严格措施保障信息安全,并在发生儿童个人信息泄露安全事件时,及时向马会反馈;
- (4) 合作关系或委托关系解除时及时删除或匿 名化儿童个人信息;
- (5) 非经履行相应法定义务,不得转委托或再次对外共享、转移、公开披露儿童个人信息;
- (6) 其他依法应当履行的儿童个人信息保护义务。
- 3. 马会如何存储和跨境转移儿童个人信息
 - 3.1 儿童个人信息的保存

马会依据适用的个人信息保护法律和法规,以 及达成本规则所述的目的所需的期限内存储儿 童的个人信息,当相应的儿童个人信息不再相 关时以及在适用法律规定的存储期到期后的任 何情况下,马会会根据适用法律的要求删除儿 童个人信息,或匿名化处理,除非在更长的时 期内需要处理相应信息。具体请参见《个人信 息处理规则》"马会如何存储和跨境转移阁下 的个人信息"章节。

3.2 跨境转移

原则上, 马会将根据本处理规则列出的处理目 的在中国境内处理儿童个人信息。然而,由于 马会通过跨境的资源和服务器提供产品和服 务, 马会可能必须对儿童个人信息进行跨境转 移才能完成订单、处理资料或提供相应产品和 服务,因此,马会可能需要将部分儿童个人信 息提供给境外接收方进行处理(详情请参阅《个 人信息处理规则》附件之《第三方信息共享清 单》)。在前述情况下,相关儿童个人信息可 能会被转移到阁下或阁下孩子使用产品和服务 所在国家的境外管辖区,或者受到来自这些管 辖区的访问。相关境外管辖区为香港特别行政 区,该地区已制定了个人信息保护法律。除了 获得单独同意及完成相应的跨境传输的条件 外, 马会还将采取一切合理必要的步骤, 以确 保相关儿童个人信息得到安全处理,得到在中 国境内足够同等的保护。

如需进行超出本处理规则规定的范围进行跨境 转移及/或境外再转移,马会将会单独征得阁 下或阁下父母或监护人的授权同意并根据个人 信息保护相关法律法规的要求完成跨境转移及 再转移的前提条件。

4. 马会如何保护儿童个人信息

马会非常重视儿童个人信息的隐私及安全并采取一切合理可行措施以保护阁下或阁下孩子的个人信息。马会将从物理、技术及组织管理三方面采取各种措施,保护或者协助保护儿童个人信息,防止儿童个人信息在未获授权或意外情况下被查

- To process children's personal information in accordance with laws and regulations and the requirements of the Club;
- (2) To assist the Club in responding to applications and inquiries from guardians;
- (3) To take strict measures to safeguard information security and provide timely feedback to the Club whenever there is a security breach;
- (4) To delete or anonymize children's personal information in a timely manner when the partnership or engagement relationship is terminated;
- (5) Not to subcontract or re-share, transfer or publicly disclose children's personal information without fulfilling the corresponding legal obligations;
- (6) Any other obligations to protect children's personal information as required by law.
- 3. How we store and transfer children's personal information across border
 - 3.1 Retention of children's personal information

The Club will store children's personal Information in accordance with applicable personal Information protection laws and regulations as well as within the period necessary to achieve the purposes described in the Rules, and when the corresponding children's personal information is no longer relevant and in any case after the expiration of the retention period under applicable law, the Club will delete or anonymize the children's personal information asrequired by the applicable laws, unless a longer period of time is required to process the relevant information. You may refer to the section titled "How we store and transfer personal information across borders" in the *Personal Information Processing Rules* for more information.

3.2 Cross-border transfer of children's personal information

In principle, the Club will process children's personal information in the territory of the PRC in accordance with the processing purposes set out in the Rules. However, as the Club provides goods and services through crossborder resources and servers, the Club may have to make cross-border transmission of your children's information in order to complete the relevant orders, process the relevant information or provide the relevant products and services. Therefore, the Club may need to provide some of the children's personal information to recipients outside of the PRC for processing (You may refer to the attachment titled The Third Party List of Information Sharing in the Personal Information Processing Rules for more information). In such cases, the relevant children's personal information may be transferred to, or be accessed by jurisdictions outside of the country in which you or your children use the products and services. The aforementioned jurisdiction is the Hong Kong Special Administrative Region, which has enacted personal information protection laws. In addition to obtaining separate consent and completing the appropriate conditions for cross-border transfers, the Club will take all steps reasonably necessary to ensure that the relevant children's personal information is processed securely and is under sufficiently equivalent protection to the same extent as it is in the territory of the PRC.

In the event of a cross-border transfer and/or furthertransfer outside of the PRC beyond the scope of the Rules, the Club will separately obtain your or your parent's or guardian's authorized consent and complete the prerequisites for the cross-border transfer and further transfer in accordance with the requirements of the relevant laws and regulations. 阅、处理、删除或作其他用途。如阁下希望了解 更多关于马会采取的保护儿童个人信息的措施, 请参见《个人信息处理规则》"马会如何保护阁下 的个人信息安全"章节。

5. 如何管理儿童个人信息

《个人信息处理规则》之"阁下如何行使个人信息 权利"章节适用于阁下作为儿童的父母或监护人, 可以代其行使其中规定的相应个人信息权利的情 形。

6. 处理规则的更新

阁下知悉并同意,马会将不时在网站 https://www.beijingclubhouse.com/zh-CN/privacystatement.aspx 公布其对本处理规则的更新,马会将标注本处理规则最近更新的日期,并经公示后生效。未经明确同意,马会不会削减阁下及阁下孩子按照本处理规则所应享有的权利。对于重大变更,马会还会提供更为显著的通知(包括对于某些儿童个人信息处理事项的变更,马会将通过电子邮件、短信、信函或其他联络方式向阁下发送通知说明具体变更内容并取得阁下的单独同意(如涉及))。烦请阁下经常回访本处理规则,以阅读最新版本。

7. 如何联系马会

如果阁下对本处理规则有任何疑问、顾虑或建议, 可联系马会的保障资料私隐主任。马会保留收取 合理的费用权利以处理阁下访问或更正阁下及阁 下孩子的个人信息的请求。

阁下可致函以下人士提出上述要求:

中华人民共和国北京市东城区金宝街 68 号邮编 100005

保障资料私隐主任

联系电话: (86 10) 5911 8888

8. 适用语言

本文件以简体中文书就,若其他语言文字的翻译版本(如英文)与简体中文版存在不一致之处,以简体中文版为准。

4. How we protect children's personal information

The Club attaches great importance to the privacy and security of children's personal information, and will take all reasonable and feasible measures to protect your or your children's personal information. The Club shall take physical, technical and organizational measures to protect or assist in protecting children's personal information from unauthorized or accidental access, processing, deletion or other use. If you wish to know more about the measures taken by the Club to protect the children's personal information, please refer to the section titled "How we protect the security of your personal information" in the *Personal Information Processing Rules* for more information.

5. How we deal with children's personal information

The section titled "Your personal information rights" in the *Personal Information Processing Rules* shall apply to circumstances where you, as the children's parent or guardian, may exercise the corresponding personal information rights set forth therein on behalf of the children.

6. Updates to the Processing Rules

You acknowledge and agree that we may post on the website at https://www.beijingclubhouse.com/en-US/privacystatement.aspx changes to the Rules from time to time, we shall mark the latest update date of the Processing Rules and such rules shall come into effect after being published. Without explicit consent, we will not reduce your and your children's rights under the Processing Rules. For major changes to the Rules, we will provide prominent notifications (including changes of certain children's personal information processing matters, in which circumstance we may send a notice to you by email, SMS, letter or other contact means explaining the specific changes and obtaining your separate consent (if required)). You are kindly requested to read the latest version of the Processing Rules.

7. How to contact us

If you have any questions, concerns or suggestions regarding the Rules, you may contact our Data Privacy Compliance Officer. We reserve the right to charge a reasonable fee for the processing of requests for access or revision of your and your child's personal information.

You may direct your request in writing to:

Data Privacy Compliance Officer

No.68 Jinbao Street, Dongcheng District Beijing, 100005, P.R.C.

Tel: (86 10) 5911 8888

8. Languages

This document is written in simplified Chinese. In case there is any inconsistency between the simplified Chinese version and the translated versions in other languages (e.g. English) of this document, the simplified Chinese version shall prevail.



个人信息处理规则

最新版更新日期: 2023年6月30日

欢迎阁下访问北京香港马会会所!

北京香港马会会所由北京香港马会会所有限公司("马会")负责运营及管理、北京香港马会会所有限公司是一家根据中华人民共和国("中国"、为本规则之目的、不包括香港特别行政区、澳门特别行政区及台湾地区)法律成立的公司,其注册地址为北京市东城区金宝街 68 号。

马会致力于确保其所管理个人信息的机密及安全。马会深知个人信息对阁下的重要性,因此,马会非常重视保护阁下的个人信息和私隐,并会尽全力保护阁下的个人信息安全可靠。马会将按照适用法律法规要求,并通过本《个人信息处理规则》("本处理规则""本规则")让阁下清楚地了解马会会如何集及使用阁下的个人信息,阁下拥有的管理个人信息的各种选择以及马会保护阁下个人信息的决心与会致力于维持阁下对马会的信任,恪守以下原则、保护阁下的个人信息:权责一致原则、确保安全原则、选择同意原则、最小必要原则、确保安全原则、连体参与原则、公开透明原则等。同时,马会承诺,马会将按广受业界认可的安全标准,采取相应的安全保护措施来保护阁下的个人信息。

马会提请阁下特别注意本处理规则的适用范围:

- (1) 本处理规则适用于马会向阁下提供的所有产品和服务,包括(a) 马会通过社交媒体、在线沟通等线上渠道向阁下提供的产品和服务;以及(b) 马会通过阁下到访马会场所,或通过其他线下互动方式向阁下提供的设施、商品和服务等。
- (2) 如果马会的关联公司提供的产品和服务中使用了 马会提供的产品和服务但未设独立的个人信息处 理规则的,则该部分产品和服务同样适用本处理 规则;如果马会的关联公司已设置独立的个人信 息保护规则的,则独立的个人信息保护规则优先 适用,该等独立的个人信息保护规则中未提及而 本处理规则有约定的内容,适用本处理规则。
- (3) 本处理规则不适用于马会提供的产品和服务中包含的第三方提供的产品和服务,该等产品和服务由第三方负责运营或提供,马会对该等第三方处理阁下个人信息的方式并无控制权,也不对其内容或者处理方式予以认可。阁下须阅览该等第三方的相关个人信息处理规则或类似规定,以了解其可能会以何种方式使用阁下的个人信息。

Personal Information Processing Rules

Latest version: 30 June, 2023

Welcome to the Beijing Hong Kong Jockey Club Clubhouse!

Beijing Hong Kong Jockey Club Clubhouse is operated and managed by Beijing Hong Kong Jockey Club Clubhouse Limited, a company incorporated under the laws of the People's Republic of China ("the PRC", for the purpose of the Rules only, excluding Hong Kong Special Administrative Region, Macau Special Administrative Region and Taiwan), with its registered address at No. 68 Jinbao Street, Dongcheng District, Beijing ("the Club", "we", "us" or "our").

The Club is committed to ensuring the confidentiality and security of the personal information managed by the Club. The Club is well aware of the importance you attach to your personal information, therefore, the Club attaches great importance to the protection of your personal information and privacy, and will make every effort to protect the safety and reliability of your personal information. The Club will, pursuant to applicable laws and regulations and through this Personal Information Processing Rules ("the Processing Rules" or "the Rules") let you understand how the Club may collect and use your personal information, your options for managing your personal information and the Club's determination to protect your personal information. The Club is committed to maintaining your trust in us and be bound by the following principles in protecting your personal information: parity of power and responsibility, explicitly setting out the purposes, consent based, data minimisation, ensuring safety, subject participation, and openness and transparency, etc. At the same time, the Club promises to protect your personal information by taking measures in line with widely recognised security standards within the industry.

The Club wishes to draw your particular attention to the scope of application of the Rules:

- (1) The Rules apply to all products and services provided by the Club to you, including (a) products and services provided by the Club to you through online channels such as social media and online communications; and (b) facilities, goods and services provided by the Club to you through your visit to the Club, or through other offline interactions, etc.
- (2) If affiliates of the Club provide products and services without developing independent personal information processing rules and such products and service has utilised products and services provided by the Club, the Rules shall apply equally to such portion of the products and services. If affiliates of the Club have developed independent personal information protection rules, the independent rules shall prevail. However, for the contents that are not mentioned in such independent rules but are agreed upon in the Rules, the Rules shall apply.
- (3) The Rules shall not apply to the products and services provided by third parties that are included in the products and services provided by the Club. Such products and services are operated or provided by third parties. The Club has no control over the processing of your personal information by such third parties nor shall the Club approve the contents or the method of processing thereof. You shall consult with such third parties for their relevant personal information processing rules or similar provisions to find out how your personal information may be used by such third parties.

本处理规则将帮助阁下了解以下内容:

- 1. 马会如何收集和使用阁下的个人信息
- 2. 马会如何共享、转让和公开披露阁下的个人信息
- 3. 马会如何保护阁下的个人信息安全
- 4. 马会如何存储和跨境传输阁下的个人信息
- 5. 马会如何保护未成年人的个人信息安全
- 6. 阁下如何行使个人信息权利
- 7. 本处理规则的修订和通知
- 8. 如何联系马会
- 9. 适用语言

请在使用马会的产品和服务前仔细阅读并了解本处理规则,希望阁下在使用马会的产品和服务前确认阁下已经充分理解本处理规则所载明的内容,并让阁下可以按照本处理规则的指引做出阁下认为适当的选择。如果阁下勾选同意相关选项,即意味着阁下完全理解本处理规则的全部内容,并同意马会根据本处理规则收集、存储、使用、加工、传输、提供、公开及/或删除有关阁下的个人信息。若阁下不同意本处理规则的任何一部分,马会可能无法向阁下提供产品和服务。

1. 马会如何收集和使用阁下的个人信息

1.1 在阁下允许或根据适用的法律法规之情况下, 马会可能向阁下直接及/或从其他来源包括但 不限于马会的关联公司及/或马会的服务提供 方、合作伙伴及/或其他第三方收集阁下的个 人信息。马会将要求第三方提供其个人信息来 源合法的确认,并在阁下授权的范围内使用相 关信息。

在向马会提供阁下以外的任何人(例如阁下的家庭成员)的任何个人信息前,阁下应确保并保证该人士(或该人士的父母或法定监护人(视情况而定))已仔细阅读、理解并同意本处理规则,尤其应告知该人士(或该人士的父母或法定监护人(视情况而定))马会如何收集和处理该人士的个人信息并征得该人士(或该人士的父母或法定监护人(视情况而定))所有必要的同意。如经马会要求,阁下应向马会提供任何必要的支持文件以证明该等行动。

马会将基于以下目的处理阁下的个人信息,为了使马会能够实现这些目的并向阁下提供相应的产品和服务,以下列出的个人信息(包括敏感个人信息)是必要的,如果这些个人信息无法提供或不准确,马会可能无法向阁下提供相应的产品和服务:

The Processing Rules will help you understand the following:

- 1. How we collect and use your personal information
- 2. How we share, transfer, and publicly disclose your personal information
- 3. How we protect the security of your personal information
- 4. How we store and transfer your personal information across border
- 5. How we protect minors' personal information
- 6. Your personal information rights
- 7. Updates and notifications of the Processing Rules
- 8. How to contact us
- 9. Languages

Please read and understand the Processing Rules carefully before using in any manner the products and services of the Club. You are expected to confirm that you have completely understood the contents of the Rules before using the products and services of the Club and shall be guided by the Rules to make appropriate decisions. If you tick the relevant checkbox(es), it means that you fully understand the Rules and agree that the Club may collect, store, use, process, transmit, provide, publicise, and/or delete your personal information in accordance with the Rules. If you do not agree to any part of the Rules, the Club may not be able to provide products and services to you.

1. How we collect and use your personal information

1.1 The Club may collect your personal information directly from you and/or from other sources including, but not limited to, the Club's affiliated companies and/or the Club's service providers, partners and/or other third parties, as permitted by you or in accordance with applicable laws and regulations. The Club will require third parties to provide confirmation of the lawfulness of the source of their personal information and to use such information within the scope of your authorization.

Before providing any personal information of any person other than you (e.g. a member of your family) to the Club, you shall ensure and warrant that such person (or such person's parent or guardian, as the case may be) has carefully read, understood and agreed to the Rules and, in particular, shall inform such person (or such person's parent or guardian, as the case may be) of how the Club collects and processes personal information and obtain all necessary consents from that person (or that person's parent or guardian, as the case may be). If requested by the Club, you shall provide the Club with any necessary supporting documentation to prove such action.

The Club will process personal information for the following purposes and the personal information listed below (including sensitive personal information) is necessary to enable the Club to achieve the purposes, and if such personal information is unavailable or inaccurate, the Club may not be able to provide the corresponding products and services:

处理目的	马会可能收集的个人信息
会籍申请及会籍管理	 身份信息,包括姓名、性别、出生日期、国籍、国内居住年限、婚姻状况、结婚证书、身份证件类型、身份证件(例如护照、身份证、回乡证、合胞证、港澳台身份证)、照片、会员编号 联系信息,包括电邮地址、邮寄地址、住宅地址、电话号码、传真号码 教育及职业背景,包括教育背景、公司地址、公司电话、在职证明、相关资料财务信息、包括收入、个人信用报告、收入或纳税证明 其他信息,包括电影会会员的关系、社会服务信息、个人过往不良记录信息 第三方信息,包括配偶及子女的姓名、性别、出生日期、国籍、公司地址、公司电话、电邮地址、邮寄地址、住宅地址、电话号码、传真号码、照片、结婚证书、婚姻状况、国内居住年限、在职证明、任职机构、收入、任职年限、专业资格、相关就业背景信息、身份证件类型、身份证件、工作签证及其他相关资料
参加线上/线下 会员活动	 身份信息,包括姓名、性别、出生日期、照片、国籍、联络方式(例如电邮地址、邮寄地址及住宅地址、电话号码及传真号码)、会员编号、身份信息(例如身份证、护照、港澳通行证、回乡证及其他相关资料)、社交网络ID 教育背景/工作信息,包括单位名称、职位、公司地址、公司电话等车辆信息,包括银行账户或银行卡信息、账单资料、发票信息及支付收款记录 财务信息,包括银行账户或银行卡信息、账单资料、发票信息及支付收款记录 对局信息,包括活动日期/时间、活动照片或录影、客房房间号、行程接送安排等 子女信息,包括姓名、年龄、身份证号、护照、饮食要求或相片或录影等人信息、包括健康状况、通讯记录、活动问卷调查反馈
订购商品及订购 商品、节日礼品 的配送、商品维 修	姓名会员编号邮寄地址联系电话电子邮件地址

Purpose of processing	Personal information we may collect
Membership application and membership administration	Identification information, including name, gender, date of birth, nationality, lengths of residence in the PRC, marital status, marriage certificate, types of identity, identity certificates (e.g. passport, ID card, home-visit certificate, Taiwan Compatriot Pass, Hong Kong, Macau and Taiwan ID card), photo, membership number Contact information, including email address, mailing address, residential address, mailing address, residential address, telephone number, fax number Education and employment background, including education background, including education background, eompany address, company phone number, proof of employment, employer, lengths of employment, employer, lengths of employment, professional qualifications, relevant employment background information, work visa and other relevant information Financial information, including income, personal credit report, proof of income or tax payment Other information, including relationship with members of the Club, social service information, adverse personal record Third party information, including spouse's and children's name, gender, date of birth, nationality, company address, company telephone number, email address, mailing address, residential address, telephone number, fax number, photo, marriage certificate, marital status, lengths of residence in the PRC, proof of employment, employer, income, lengths of employment, professional qualifications, relevant employment background information, types of identity, identity certificates, work visa and other related documents
To participate in online/offline membership activities	Identification information, including name, gender, date of birth, photo, nationality, contact information (e.g. email address, mailing and home address, phone number and fax number), membership number, identification information (e.g. ID card, passport, mainland travel permit for Hong Kong and Macau residents, home return permits and other related information), social media IDs Education background and job information, including the name of employer, position, company address, company phone number, etc. Vehicle information, including license plate number, driving license, driver's license Financial information, including bank account or bank card information, billing information, invoice information and payment or receipt records Activity information, including activity date/time, activity photos or videos, room number, pick-up and drop-off arrangements, etc. Child information, including name, age, ID number, passport, dietary requirements or preference, emergency contact information, personal artwork, photos or videos, etc.

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	• 购买商品的详细情况 爱好
设施 / 系统的日 常运营及维护	姓名会员编号联系方式使用会所设施记录
现场连接服务, 例如WiFi、电视、 阅览室和娱乐 系统	 入住房号 会员编号 设备 MAC 地址 URL 网站地址 IP 地址
预订、预约、注 册、领别,是 一种,是 一种,是 一种,是 一种,是 一种,是 一种,是 一种,是 一种	 身份信息、包括姓名、性别、出生日期、民族、国籍、照片、身份证件号码、身份证件类型、身份证明文件、婚姻状况、结婚纪念日等 联系信息、包括手机号码、电子邮件地址、住宅地址、邮寄地址、住宅电话、公司地址、公司电话、传真号码会员信息、包括会员编号、会员生效/到期日期、会员账户交易/使用记录/购买记录等信息、会员反馈信息 预定信息,包括入住天数、入住/退房日期/离店日期、房号、订房编号、预定号码、行程信息等 阁下选择提供的任何其他信息,例如爱好、使用会所设施的详细情况、使用会所设施记录、购买商品的详细情况
支付服务	会员编号 财务信息,包括银行账号、信用卡号、 账单资料、发票信息、支付记录、支 付信息等
向 马 会 提 出 要 求、查询、咨询、 评论和投诉,以 及向马会发送信 息、留言	身份信息,包括姓名、手机号码、电子邮件地址、社交网络 ID 会员编号 预订号码 发票信息 留言及咨询内容
处理保险理赔和 付款	身份证明文件银行账号医疗记录支付凭证账单信息
填写调查问卷	• 调研问卷填答内容、意见
改善现有设施、 商品、系统(包括测试分,或者 等系统),或者 设计、开发新设 施、开发新统, 以提高会所设施 服务体验	 身份信息、包括姓名、会员编号 偏好信息、包括使用会所设施的记录 / 使用会所设施的详细情况、购物记录 / 购买商品的详细情况、喜爱商品的类 别、服务的偏好、爱好、语言

	Preference information, including accommodation preferences, dining preferences, etc. Other information, including health status, communication records, feedback of activity questionnaire survey
To order goods and delivery of ordered goods and holiday gifts and to provide repair services for the goods	 Name Membership number Mailing address Contact number E-mail address Details of purchases Hobbies
Daily operation and maintenance of facilities/systems	 Name Membership number Contact Information Record of using the Club's facilities
On-site connectivity services, such as WiFi, television, library amenities and entertainment systems	 Room number Membership number Device MAC address URL Website address IP address
To reserve, book, register, and use the dining, accommodation, conferencing, shopping and entertainment facilities or other services of the Club and its affiliates as well as partners	Identification information, including name, gender, date of birth, ethnicity, nationality, photo, ID number, ID type, ID certificates, marital status, wedding anniversary, etc. Contact information, including phone number, email address, residential address, mailing address, residential phone number, company address, company phone number, fax number Membership information, including membership information, including membership number, membership account transaction/use record/purchase record, etc., member feedback information Reservation information, including check-in/check-out dates, room number, reservation code, reservation number, itinerary information, etc. Any other information you choose to provide, such as hobbies, details of using the Club's facilities, records of using the Club's facilities, details of purchases
Payment services	Membership number Financial information, including bank account or credit card information, billing information, invoice information payment records and payment information, etc.
To submit requests, inquiries, comments and complaints to the Club, and send information and messages to the Club	Identification information, including name, phone number, email address, social media IDs Membership number Booking number Invoice information Message and inquiry content
To process insurance claims and payments	 ID certificates Bank account Medical records Payment vouchers Billing information
To fill out the questionnaire	The content and opinions of the survey questionnaire

间接用户特征分析、数据分析(例如分析趋势、使用和其他用户数据为制度的形式,使用的商业开发。	 身份信息,包括姓名、会员编号、会籍申请表编号、推荐人姓名、国籍、出生日期、性别、婚姻状况、结婚纪念日 教育及职业信息,包括教育程度、任职情况、任职机构、专业资格 会员账户信息,包括会员账户交易信息、账单资料、消费记录、购物记录、性房/餐饮/购物/休闲消费情况、支付方式 会员活动信息,包括订餐信息、预定信息、订座信息、购买商品的详细情况、使用会所设施的详细情况、参加活动情况、住房使用设施情况 偏好信息,包括爱好、喜爱商品的类别、服务的偏好、爱好(餐饮/休闲/购买习惯) 其他信息,包括回复情况/特殊事件/不良行为历史、问卷答复
财务数据分析并编制合并报表	 身份信息,包括姓名、出生日期、性别、婚姻状况、身份证件号码 联系信息,包括住宅地址、公司地址、联系电话、公司电话、电子邮件地址 会员信息,包括会员编号、会员生效/到期日期、会员账户交易记录、会员特权到期日期
为提供个性化服 务或进行调查分 析之目的,发送 营销信息	会员姓名 社交网络 ID 会员编号 电子邮件地址 联系电话 即时通讯号码 邮寄地址 使用会所设施的详细情况及记录 购买商品的详细情况及购物记录 爱好
通过内刊杂志刊载会员采访	 会员姓名 会员编号 任职信息、职业经历 婚姻状况 使用会所设施的详细情况及记录 购买商品的详细情况及购物记录 爱好

- 1.2 为遵守和履行马会在下述任一项法律法规、协议或相关法律程序的要求或义务,马会将根据相关法律法规、协议或法律程序的要求处理阁下的个人信息:
 - (1) 为履行(强制或自愿的)任何义务、规定或安排,或者建立、行使或捍卫马会合法权利,或者与以下所列或与其中任何一项相关的要求:
 - (a) 中国境内或境外目前及将来的任何法

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To improve existing facilities, merchandise, systems (including testing and upgrading such systems), or to design and develop new facilities, merchandise and systems to enhance the service/facility experience	Identification information, including name, membership number Preference information, including records/details of using the Club's facilities, records/details of purchases, favourite categories of products, preferences for services, hobbies, languages
Indirect user profiling, data analysis (e.g. analysis of trends, usage and other user behaviour) and commercial development of big data applications	Identification information, including name, membership number, membership application form number, referrer's name, nationality, date of birth, gender, marital status, wedding anniversary Education and employment information, including education degree, employment status, employer, professional qualifications Membership account information, including membership account transaction information, billing information, consumption records, shopping records, housing/dining/shopping/leisure consumption, payment methods Member activity information, including ordering information, booking information, reservation information, details of purchase of goods, details of use of the Club's facilities, participation in activities, use of accommodation facilities Preference information, including hobbies, favorite product categories, service preferences, hobbies (dining/leisure/purchasing habits) Other information, including response status/special events/bad behavior history, questionnaire responses
Analysis of financial data and preparation of consolidated statements	Identification information, including name, date of birth, gender, marital status, ID number Contact information, including residential address, company address, contact phone number, company phone number, email address Membership information, including membership number, membership effective/expiration date, membership account transactionrecord, membership privilege expiration date
To send marketing messages for the purpose of providing personalized services or conducting research and analysis	Member name Social media IDs Membership number Email address Contact phone number Instant messaging number Mailing address Details and records of using the Club's facilities Details and records of purchases Hobbies
Publication of member interviews through internal magazines	Member name Membership number Employment information, career experience Marital status Details and records of using the Club's facilities Details and records of purchases Hobbies

- 1.2 The Club may process your personal information if required by the following relevant laws and regulations, agreements, or related legal procedures in order to comply with such requirements or obligations:
 - (1) Meeting any obligations, requirements or arrangements

- 律、法规、判决、法令及制裁制度;
- (b) 中国境内或境外任何法律、监管、政府、 税务、执法或其他机构作出及发出的任 何指引、指示、指令或要求;
- (c) 马会的规章、政策或程序; 或
- (d) 马会与阁下之间的任何协议。
- (2) 根据遵守相关制裁或预防或侦测洗钱、恐怖分子融资活动或其他非法活动的任何计划需要,履行与共享马会资料及资讯及/或以其他方式使用资料及资讯相关的任何义务、要求、政策、程序、措施或安排。
- (3) 预防、发现或调查异常现象,预防欺诈行为或其他可能被禁止或非法的活动和/或对欺诈行为或其他可能被禁止或非法的活动进行救济,或者以其他方式保护马会及其关联公司的廉洁性。
- (4) 回应或参与法律程序,包括为此寻求法律 意见。
- 1.3 根据适用的法律法规,在大多数情况下,马会处理阁下的个人信息的法律依据是征得阁下的同意,在中国适用的个人信息保护法律法规要求的特定情况下,马会将在征得阁下的单独同意后处理阁下的个人信息。除此之外,阁下认可并同意在以下情况,马会无需获得阁下的同意即可处理阁下的个人信息:
 - (1) 为订立、履行阁下作为一方当事人的合同 所必需,或者按照依法制定的劳动规章制 度和依法签订的集体合同实施人力资源管 理所必需;
 - (2) 为履行法定职责或者法定义务所必需;
 - (3) 为应对突发公共卫生事件,或者紧急情况下为保护自然人的生命健康和财产安全所必需;
 - (4) 为公共利益实施新闻报道、舆论监督等行为,在合理的范围内处理个人信息;
 - (5) 依照法律规定在合理的范围内处理个人自 行公开或者其他已经合法公开的个人信息;
 - (6) 法律、行政法规规定的其他情形。
- 2. 马会如何共享、转让和公开披露阁下的个人信息

2.1. 共享

为实现本处理规则第1条规定的目的,马会可能会向关联公司、合作伙伴、供应商等第三方共享阁下的个人信息(包括敏感个人信息),以保障向阁下提供产品以及为阁下提供的服务顺利完成。但马会仅会出于合法、正当、

- (whether compulsory or voluntary), or establishing, exercising or defending any legal rights of the Club, in connection with:
- a) Any existing or future law, regulation, judgment, court order, sanctions regime, within or outside the PRC;
- b) Any guidelines, directions, demands or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities within or outside the PRC;
- c) Any of the Club's bye-laws, policies and procedures;
- d) Any agreements between you and the Club.
- (2) Complying with any obligations, requirements, policies, procedures, measures or arrangements to share information and news of the Club and/or to use such information and news in other ways in accordance with relevant programmes for sanctions compliance or prevention or detection of money laundering, terrorist financing or other unlawful activities;
- (3) Preventing, detecting or investigating anomalies and preventing and/or remediating fraud or other potentially prohibited or illegal activities or otherwise protecting the integrity of the Club and its affiliated companies;
- (4) Responding or taking part in legal proceedings, including seeking professional advice.
- 1.3 In accordance with applicable laws and regulations, in most cases, the legal basis for the Club to process your personal information is to obtain your consent, and in certain circumstances required by applicable PRC personal information protection laws and regulations, the Club will process your personal information with your separate consent. In addition, you acknowledge and agree that the Club does not need to obtain your consent to process your personal information in the following circumstances:
 - (1) where it is necessary for the conclusion or performance of a contract to which you are a party, or for the implementation of human resources management in accordance with the labor rules and regulations formulated in accordance with the law and the collective contract concluded in accordance with the law;
 - (2) where it is necessary for the performance of statutory duties or statutory obligations;
 - (3) where it is necessary for the response to a public health emergency or for the protection of the life, health and property safety of a natural person;
 - (4) where processing your personal information is for the purpose of news reporting or carrying out supervision by media in public interest and is within a reasonable scope;
 - (5) where the personal information processed has been disclosed by you or otherwise legally disclosed and such processing is within a reasonable scope as required by law;
 - (6) Other circumstances prescribed by laws and administrative regulations.
- 2. How we share, transfer, and publicly disclose your personal information

2.1 Share

We may share your personal information (including sensitive personal information) with third parties such as 必要、特定、明确的目的共享阁下的个人信息, 以保障和优化马会向阁下提供的产品和服务。 这些第三方(包含中国境内和中国境外实体) 包括:

- (1) 关联公司:为了保障向阁下提供产品、为 阁下提供的服务顺利完成以及实现集团的 统一化管理,马会可能会与关联公司共享 阁下的个人信息。马会的关联公司将采取 不低于本处理规则且同等严格的保护措施。
- (2) 合作伙伴: 仅为实现本处理规则第1条规 定的目的, 马会的某些服务将由合作伙伴 提供,或由马会与合作伙伴共同提供,例如: 当阁下进行支付、申请退款时, 马会需要 将阁下的订单信息与金融机构或第三方支 付机构(包括微信支付及银联等支付通道) 共享以实现阁下的支付指令并完成支付; 当马会申请保险赔付(包括公共责任险赔 付)时,马会会与保险机构共享身份证明 文件、医疗记录、支付凭证、账单信息等。 其他合作伙伴还包括提供物流服务、支付 处理、订单履行、信息技术和相关基础设施、 会员服务、电子邮件传送、市场营销、技 术服务和咨询服务的公司、发送新闻邮件、 营销材料和促销资讯的公司、发送调查问 卷、进行市场营销分析的咨询公司、提供 咨询服务(律师、会计师和审计师)的个人、 公司、协会或专业人员等。
- (3) 除此之外, 马会可能会基于本处理规则第 1.2 条及第 1.3 条的规定共享阁下的个人信 息。

请阁下知悉,马会仅会出于合法、正当、必要、特定、诚信、明确的目的共享阁下的个人信息。马会将评估第三方收集阁下的个人信息的合法性、正当性、必要性,同时,要求第三方在阁下的授权同意范围内处理阁下的个人信息,采取必要的信息管理措施与技术手段,防止阁下的个人信息发生泄露、损毁、丢失、篡改等后果。第三方无权将所共享的阁下的处理目的、处理方式的,将重新取得阁下的授权同意。

关于该等数据接收方的更多信息,请参阅本 处理规则之附件《第三方信息共享清单》。

2.2. 转让

马会不会将阁下的个人信息转让给任何公司、 组织和个人,但以下情况除外:

- (1) 获得阁下的明确同意或授权;
- (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;

our affiliated companies, business partners or suppliers to facilitate the provision of products and services to you for the purposes set forth in Article 1 of the Rules. However, we will only share the personal information for purposes that are legitimate, proper, necessary, specific and clear and only to the extent necessary in order to safeguard and optimize the products and services provided to you by the Club. Such third parties may be entities within or outside of the PRC, including:

- (1) Affiliated companies: in order to ensure the successful provision of the products and services to you and to achieve uniformity in the management of our group, the Club may share your personal information with our affiliated companies. The Club's affiliated companies will adopt no less stringent protection measures than those set out herein.
- (2) Business partners: only for the purposes set forth in Article 1 of the Rules, certain services of the Club will be provided by partners or jointly provided by the Club and partners. For example, when you make a payment or apply for a refund, the Club needs to share your order information with financial institutions or third-party payment institutions (including payment channels such as WeChat Pay and UnionPay) to fulfil your payment instructions and complete the payment; when the Club applies for insurance claims (including public liability insurance claims), the Club may share identification documents, medical records, payment vouchers, billing information, etc. with insurance institutions. Such other business partners include companies that provide courier services, payment processing, order fulfilment, information technology and related infrastructure, membership services, email transmission, marketing, technical services and consulting services, companies that send newsletters, marketing materials and promotional information, consulting firms that send surveys, conduct marketing analysis, individuals, companies, associations or professionals that provide consulting services (lawyers, accountants and auditors), etc.
- (3) In addition, the Club may share your personal information in accordance with the provisions of Articles 1.2 and 1.3 of the Rules.

Please be aware that the Club will only share your personal information for lawful, legitimate, necessary, specific, integrity and explicit purposes. The Club will assess the legality, legitimacy and necessity of the third party's collection of your personal information, and will require the third party to process your personal information within the scope of your authorization and consent, as well as to take necessary measures and technical means to prevent the leakage, destruction, loss and falsification of your personal information. The third party has no right to use your personal information shared for other purposes, and it shall obtain your additional consent anew in case of changes in the purpose and method of processing your personal information.

You may refer to the attachment titled *the Third Party List* of *Information Sharing* in the Rules for more information of the recipients.

2.2 Transfer

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

- (1) Such transfer is with your explicit consent or under your authorisation;
- (2) Such transfer is in accordance with applicable laws

(3) 在涉及合并、分立、清算或破产时,如涉及到个人信息转让,马会会要求新的持有阁下个人信息的公司、组织继续受本处理规则的约束,否则,马会将要求该公司、组织重新向阁下征求授权同意。

2.3. 公开披露

马会仅会在以下情形下,公开披露阁下的个 人信息:

- (1) 获得阁下的明确同意;
- (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, 马会可能会依据所要求的个人信息类型和 披露方式公开披露阁下的个人信息。

3. 马会如何保护阁下的个人信息安全

- 3.1. 马会致力于保障阁下个人信息的安全。马会将 从物理、技术及组织管理三方面采取各种措 施,保护或者协助保护阁下的个人信息,防 止个人信息在未获授权或意外情况下被查阅、 处理、删除或作其他用途。马会从个人信息 的生命周期角度出发, 在收集、存储、显示、 使用、删除等各个环节建立了安全防护措施, 根据信息敏感程度的级别采取不同的控制措 施,包括但不限于访问控制、加密传输或加 密算法进行加密存储等。马会还对可能解除 到个人信息的员工采取了严格管理,对于数 据访问、内外部传输使用、脱敏、解密等重 要操作建立了审批机制,并与上述员工签署 保密协议等。与此同时,马会还定期对员工 进行信息安全培训, 要求员工在日常工作中 形成良好操作习惯,提升数据保护意识。
- 3.2. 通过网络或移动互联网传输信息并不完全安全。上述安全措施并不排除马会遭受欺诈、网络攻击(例如黑客、间谍软件和病毒等网络攻击)的可能性,并且马会无法保证服务器或网络完全不受此类攻击。尽管马会将采取安全措施保护阁下的个人信息,但马会不能保证通过网络或移动互联网传输的数据的绝对安全性。阁下同意,对于因任何传输相关的风险而引起的任何损失或损害,马会不承担任何责任。
- 3.3. 为了应对个人信息安全事件, 马会将按照法律 法规的要求 , 依法履行汇报及通知义务, 包括: 安全事件的基本情况和可能的影响、马会已采取或将要采取的措施、阁下可自主防 范和降低风险的建议、对阁下的补救措施等。 在适用的前提下, 马会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阁下。难以逐一告知个人信息主体时, 马会会采取合理、有效的方式发布公告。同时, 马会还将按照监管部门要求, 主动上报个人信息安全事件的处置情况。

- and regulations, the requirements of legal procedures, mandatory administrative or judicial requirements;
- (3) In the event of a merger, division, liquidation or bankruptcy, we will require the new company or organisation that will obtain your personal information to remain bound by the Processing Rules or to otherwise obtain your consent separately.

2.3 Public disclosure

We will only publicly disclose your personal information under the following circumstances:

- (1) Such disclosure is with your explicit consent;
- (2) we may publicly disclose your personal information in accordance with the type of personal information requested and the manner of disclosure when such disclosure is required by law, legal procedures, litigation, or compulsorily by government authorities.
- 3. How we protect the security of your personal information
 - 3.1 We are committed to protecting the security of your personal information. We will use a variety of physical, technological and organisational measures to help protect your personal information from unauthorised or accidental access, processing, deletion or other use. From the perspective of the lifecycle of personal information, the Club has established safety protection measures in various aspects such as collection, storage, display, use and deletion, and adopted different control measures according to the level of information sensitivity, including but not limited to access control, encrypted transmission or encrypted storage by encryption algorithms. The Club also adopts strict management of employees who may have access to personal information, and establishes approval mechanisms for important operations such as data access, internal and external transmission and use, desensitization and decryption, as well as signing confidentiality agreements with these employees, etc. At the same time, the Club also regularly conducts information security trainings for employees, requiring them to form good operating habits in their daily work and enhance their awareness of data protection.
 - 3.2 The transmission of information via the internet or mobile network is not completely secure. The security measures described above do not preclude us from the possibility of fraud, cyber-attacks, such as hacking, spyware and viruses, and we do not guarantee that our servers or network will be immune from such attacks. Although we will implement security measures to protect your personal information, we cannot guarantee security of the data transmitted via internet or mobile network. You agree that the Club shall not be liable for any loss or damage arising from risks relating to any transmission.
 - 3.3 In order to respond to personal information security incidents, we will comply with reporting and notification obligations required by laws and regulations, the scope of the notification may include: the basic description and possible impact of the security incident, the measures we have taken or will take, suggestions for you to prevent and reduce risks, remedial measures for you, etc. Where applicable, we will promptly inform you of the relevant circumstances of the incident by email, letter, telephone call, push notification, etc. If it is difficult to inform the individuals affected one by one, we will take a reasonable and effective way to publish an announcement. Meanwhile, we will also proactively report the handling of personal information security incidents in accordance with the requirements of the regulatory authorities.
- 4. How we store and transfer your personal information across border

4. 马会如何存储和跨境转移阁下的个人信息

4.1. 个人信息的保存

马会依据适用的个人信息保护法律和法规, 以及达成本规则所述的目的所需的期限内存储阁下的个人信息,当相应的个人信息不再 相关时以及在适用法律规定的存储期到期后 的任何情况下,马会会根据适用法律的要求 删除阁下的个人信息,或匿名化处理,除非 在更长的时期内需要处理有关个人信息。

在评估个人信息的存储期限时,马会主要参考 以下标准并以其中较长者为准:

- (1) 完成与阁下相关的交易目的、维护相应交易记录,应对阁下可能的查询、投诉或司法程序;
- (3) 阁下同意的更长的留存期间;
- (4) 是否存在保留期限的其他特别约定或法律 法规规定。

此外,马会将充分考虑个人信息的数量、性质和敏感性,个人信息在未经授权的情况下遭到使用或披露后造成危害的潜在风险,处理个人信息的目的并且能否通过其他方式达成这些目的以及适用的法律规定等因素。

4.2. 跨境转移

原则上, 马会将根据本处理规则列出的处理 目的在中国境内处理阁下的个人信息。然而, 由于马会通过跨境的资源和服务器向阁下提 供产品和服务, 马会可能必须对阁下的个人 信息进行跨境转移才能完成阁下的订单、处 理阁下的资料或提供相应产品和服务,因此, 马会可能需要将阁下的部分个人信息提供给 境外接收方进行处理(详情请参阅本规则附件 之《第三方信息共享清单》)。在前述情况下, 阁下的个人信息可能会被转移到阁下使用产 品和服务所在国家的境外管辖区,或者受到 来自这些管辖区的访问。相关境外管辖区为 香港特别行政区,该地区已制定了个人信息 保护法律。除了获得单独同意及完成相应的 跨境传输的条件外, 马会还将采取一切合理 必要的步骤,以确保阁下的个人信息得到安 全处理,得到在中国境内足够同等的保护。

如需进行超出本处理规则规定的范围进行跨境转移及/或境外再转移,马会将会单独征得阁下的授权同意并根据个人信息保护相关法律法规的要求完成跨境转移及再转移的前提条件。

4.1 Retention of personal information

The Club will store your personal information in accordance with applicable personal information protection laws and regulations and within the period necessary to achieve the purposes described in the Rules, and when the corresponding personal information is no longer relevant and in any case after the expiration of the retention period under applicable law, the Club will delete your personal information or anonymize it in accordance with the requirements of applicable law, unless a longer period of time is required to process the relevant personal information

When assessing the retention period of personal information, the Club will primarily refer to the following criteria whichever is longer:

- To fulfil the purpose of the relevant transaction with you, to maintain the corresponding transaction records and to respond to your possible inquiries, complaints or judicial proceedings;
- (2) To ensure the safety and quality of the products and services provided by the Club to you;
- (3) A longer retention period agreed by you;
- (4) Whether there are other special agreements or legal requirements for retention periods.

In addition, the Club will give sufficient consideration to factors such as the volume, nature and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes of processing the personal information and whether those purposes can be achieved by other means, and applicable legal requirements.

4.2 Cross-border transfer of personal information

In principle, the Club will process your personal information in the territory of the PRC in accordance with the processing purposes set out in the Rules. However, as the Club provides products and services through crossborder resources and servers, the Club may have to make cross-border transfer of your personal information in order to complete the relevant orders, process the relevant information or provide the relevant products and services, therefore, the Club may need to provide some of your personal information to recipients outside of the PRC for processing (you may refer to the attachment titled the Third Party List of Information Sharing in the Rules for more information). In such cases, your personal information may be transferred to, or be accessed by jurisdictions outside of the country in which you use the products and services. The aforementioned jurisdiction is the Hong Kong Special Administrative Region, which has enacted personal information protection laws. In addition to obtaining separate consent and completing the appropriate conditions for cross-border transfers, the Club will take all steps reasonably necessary to ensure that your personal information is processed securely and receives sufficiently equivalent protection to the same extent as it is in the territory of the PRC.

In the event of a cross-border transfer and/or further transfer outside of the PRC beyond the scope of the Rules, the Club will separately obtain your authorized consent and complete the prerequisites for the cross-border transfer and further transfer in accordance with the requirements of the relevant laws and regulations.

5. How we protect minors' personal information

5.1 We attach great importance to the protection of the minors' personal information (minors refer to natural persons under the age of 18; however, minors at the age

- 5. 马会如何保护未成年人的个人信息安全
 - 5.1. 马会非常重视对未成年人(指不满 18 周岁的自然人;但 16 周岁以上的未成年人,以自己的劳动收入为主要生活来源的,视为完全民事行为能力人)个人信息的保护。如阁下为未成年人,则只有在阁下的父母或监护人明确同意根据本处理规则提供阁下个人信息的情况下,阁下才应向马会提供阁下的个人信息及使用马会的产品和服务。

 - 5.3. 马会无意处理未成年的个人信息,除非征得其 父母或监护人的同意。对于经父母或监护人同 意而收集未成年人个人信息的情况,马会仅 在法律法规允许、父母或监护人同意或保护未 成年人所必要的情况下处理此类个人信息。

6. 阁下如何行使个人信息权利

6.1. 查询、复制、更改、补充、删除阁下的个人 信息

阁下有权查询、复制、更改、补充、删除阁下的个人信息,但法律法规规定的例外情况除外。符合法律规定的前提下,阁下还有请求转移个人信息的权利。要行使前述权利或要求马会解释说明,请通过本规则第8条所载的联系方式联系马会进行操作。

6.2. 撤销同意和更改同意的范围

- (1) 马会基于阁下的同意处理阁下的个人信息。 阁下可以随时通过本规则第8条所载的联 系方式联系马会来撤销阁下的同意,同时 说明阁下要撤销哪一项同意。除法律另有 规定外,当阁下撤销同意后,马会将不再 处理相应的个人信息。但该决定不会影响 此前基于阁下的授权而开展的个人信息处 理。
- (2) 对于阁下选择提交的信息的收集和使用, 阁下可以根据第8条所载的联系方式,与 马会联系更改阁下的授权同意范围。

- of 16 or above whose main source of support is the income from his own labour is deemed as a person with full capacity for performing civil juristic acts). If you are a minor, you shall only provide your personal information and use the products and services of the Club only if your parent or guardian has expressly consented to the provision of your personal information in accordance with the Rules.
- 5.2 The Club also attaches great importance to the protection of personal information of children (refer to minors under the age of 14). If you are under the age of 14, you shall ensure that your parent or guardian has read and consented to Children's Personal Information Processing Rules and Instructions to Guardians which is specially established by the Club before providing personal information to the Club and using the Club's products and services under the guidance and consent of your parent or guardian. If your parents or guardians subsequently withdraw the consent for you relating to the provision of your personal information to us, you should immediately cease the provision of such personal information, refrain from using the services, facilities and membership of the Club and/or cease in purchasing any goods from the Club, and notify us of such withdrawal without delay so as to allow us to take appropriate actions.
- 5.3 The Club does not intend to process minors' personal information unless we obtain the consent of their parents or guardians. In cases where the Club collects personal information from minors with the consent of their parents or guardians, the Club will only process such personal information as permitted by law or regulation, as agreed by their parents or guardians, or as reasonably necessary to protect the minors.

6. Your personal information rights

6.1 Access, reproduce, revise, add and delete your personal information

You have the right to access, reproduce, revise, add and delete your personal information, subject to the exceptions provided by laws and regulations. You also have the right to request the transmission of personal information, provided that it complies with the law. To exercise the aforesaid rights or require us to provide an explanation, please contact us via the contact information set out in Article 8 of the Rules.

- 6.2 Withdraw consent and change the scope of consent
 - (1) We process your personal information on the basis of your consent. You may withdraw your consent at any time by contacting us via the contact information set out in Article 8 of the Rules below, whereupon you should specify the consent you would like to withdraw. Unless otherwise permitted by law, upon withdrawal of your consent, we will no longer process your personal information. This decision will not affect the personal information processing activities conducted based on your authorisation before such withdrawal.
 - (2) By contacting us via the contact information set out in Article 8 below, you may change the scope in your consent with respect to the collection and use of the information you provide.
- 6.3 De-registrate your membership account
 - (1) You may contact us via the contact information set out in Article 8 of the Rules at any time to de-registrate your membership account, and we will respond to your deregistration request within 15 working days.
 - (2) Upon the de-registration of your membership account, the Club will cease to provide you with goods or

6.3. 注销阁下的会员账户

- (1) 阁下可以随时通过本规则第8条所载的联系方式联系马会进行操作以注销阁下的会员账户,马会将在15个工作日内回复阁下的注销请求。
- (2) 在注销账户之后,马会将停止为阁下提供基于该账户的商品或服务,并依据阁下的要求,删除或匿名化阁下的个人信息,但法律法规另有规定的除外。

7. 本处理规则的修订和通知

阁下知悉并同意,马会将不时在网站 https://www.beijingclubhouse.com/zh-CN/privacystatement.aspx 公布其对本处理规则的更新,马会将标注本处理规则最近更新的日期,并经公示后生效。未经阁下明确同意,马会不会削减阁下按照本处理规则所应享有的权利。对于重大变更,马会还会提供更为显著的通知(包括对于某些个人信息处理事项的变更,马会将通过电子邮件、短信、信函或其他联络方式向阁下发送通知说明具体变更内容并取得阁下的单独同意(如涉及))。烦请阁下经常回访本处理规则,以阅读最新版本。

8. 如何联系马会

如果阁下对本处理规则有任何疑问、顾虑或建议, 可联系马会的保障资料私隐主任。马会保留收取 合理的费用权利以处理阁下访问或更正阁下的个 人信息的请求。

阁下可致函以下人士提出上述要求:

中华人民共和国北京市东城区金宝街 68 号邮编 100005

保障资料私隐主任

联系电话: (86 10) 5911 8888

9. 适用语言

本文件以简体中文书就,若其他语言文字的翻译版本(如英文)与简体中文版存在不一致之处,以简体中文版为准。

services based on your account and will delete or anonymise your personal information at your request, except as otherwise required by laws or regulations.

7. Updates and notifications of the Processing Rules

You acknowledge and agree that we will post on the website at https://www.beijingclubhouse.com/en-US/privacystatement. aspx changes to the Processing Rules from time to time, we shall mark the latest update date of the Processing Rules and such updated Rules shall come into effect after being publicised. Without your explicit consent, we will not reduce your rights under the Processing Rules. For major changes to the Processing Rules, we will provide prominent notifications (including changes of certain personal information processing matters, in which circumstance we will send a notice to you by email, SMS, letter or other contact means explaining the specific changes and obtaining your separate consent (if required)). You are kindly requested to read the latest version of the Processing Rules.

8. How to contact us

If you have any questions, concerns or suggestions regarding the Processing Rules, you may contact our Data Privacy Compliance Officer. We reserve the right to charge a reasonable fee for the processing of requests for access or revision of your personal information.

You may direct your request in writing to:

Data Privacy Compliance Officer

No.68 Jinbao Street, Dongcheng District Beijing, 100005, P.R.C. Tel: (86 10) 5911 8888

9. Languages

This document is written in simplified Chinese. In case there is any inconsistency between the simplified Chinese version and the translated versions in other languages (e.g. English) of this document, the simplified Chinese version shall prevail.