



深圳开立生物医疗科技股份有限公司

数据保护制度

SonoScape Medical Corp. Data Protection Protocol

2024 年 3 月 19 日

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1. 说明

Introduction

- 1.1 根据《中华人民共和国个人信息保护法》、《中华人民共和国网络安全法》、欧盟《一般数据保护条例》(GDPR) 以及其他适用法律、法规和其他规范性文件（合称**法律**）对个人数据、重要数据的处理和其他相关各方面的规定，深圳开立生物医疗科技股份有限公司及其分公司、子公司（合称**开立**）结合实际，制定本制度（**本制度**），对个人数据和重要数据的处理所必须遵循的原则和标准予以规定。

In accordance with the People's Republic of China Personal Data Protection Law, the People's Republic of China Cybersecurity Law, the European Union General Data Protection Regulation (GDPR), and other applicable laws, regulations, and normative documents (collectively referred to as "laws") regarding the processing of personal data, important data, and provisions concerning other related aspects, SonoScape Medical Corp. and its branches and subsidiaries (collectively referred to as "SonoScape") have developed this protocol ("Protocol"), in line with actual conditions, to stipulate the principles and standards that must be followed in the processing of personal and important data.

- 1.2 开立高度重视依法、正确地处理个人数据；开立严格保护开立雇员、客户和其他相关人员的个人敏感数据。

SonoScape places a high emphasis on the lawful and correct handling of personal data; SonoScape strictly protects the personal sensitive data of SonoScape employees, customers, and other related persons.

2. 目的

Purpose

- 2.1 本制度旨在确保：

The purpose of this Protocol is to ensure that:

- (A) 开立涉及处理个人数据的所有人充分知晓和遵守法律要求；

All individuals involved in the processing of personal data at SonoScape are fully aware of and comply with legal requirements;

- (B) 数据主体了解他们根据法律所享有的权利。

Data subjects are aware of their rights under the law.

- 2.2 开立现有的信息安全制度、其他信息相关制度和指南以及信息安全宣传须知等，合称**开立其他制度**与本制度同时适用。本制度与开立其他制度互为补充、共同适用，如开立其他制度与本制度存在任何不一致或矛盾的，以本制度规定为准。

SonoScape's existing information security systems, other information-related systems and guidelines, and information security awareness materials, collectively referred to as SonoScape's other systems, are applicable concurrently with this Protocol. This Protocol complements and is jointly applicable with SonoScape's other systems; in

case of any inconsistency or conflict between SonoScape's other systems and this Protocol, the provisions of this Protocol shall prevail.

3. 适用范围

Scope of Application

- 3.1 能够访问开立持有的个人数据，或代表开立处理个人数据的所有开立员工、顾问、合同方和其他授权第三方（合称开立成员），均应当遵守本制度。

All SonoScape employees, consultants, contractors, and other authorized third parties (collectively referred to as "SonoScape Members") who can access personal data held by SonoScape or process personal data on behalf of SonoScape, must comply with this Protocol.

4. 个人数据

Personal Data

- 4.1 个人数据：指如果开立成员持有某数据，通过该数据本身，或者通过该数据与“其他数据”结合，可以识别出某个自然人的个人身份。前述“其他数据”目前可能未被开立成员持有，只要开立成员有可能获得前述“其他数据”即可。

Personal data refers to any data held by SonoScape Members that, either by itself or in combination with other data, can identify a natural person. The aforementioned "other data" may not currently be held by SonoScape Members, but as long as SonoScape Members could potentially obtain the "other data", it is applicable.

例如，典型的个人事实信息（如姓名、地址和出生日期）是个人数据；与个人相关的活动和观点的记录（如开立成员保存的对某员工的评估、对某自然人互联网浏览的历史记录、对某自然人客户的评论等）也是个人数据。个人数据可能涉及（但不限于）个人的私生活或职业工作。

For example, typical personal factual information (such as name, address, and date of birth) is personal data; records of activities and opinions related to an individual (such as assessments of an employee saved by SonoScape Members, internet browsing history of a natural person, comments on a natural person customer, etc.) are also personal data. Personal data may involve (but is not limited to) an individual's private life or professional work.

- 4.2 个人敏感数据：指一旦泄露、非法提供或滥用，可能危害个人人身和财产安全，极易导致个人名誉、身心健康受到损害或歧视性待遇等的个人数据，具体可包括：

Personal Sensitive Data: Refers to personal data that, if leaked, illegally provided, or misused, could jeopardize an individual's physical and financial safety, and is highly likely to result in harm to an individual's reputation, mental and physical health, or lead to discriminatory treatment. This may specifically include:

- (A) 个人财产信息：包括银行帐号、鉴别信息（口令、密码）、存款信息（包括资金数额、支付收款记录等）、房产信息、信贷记录、征信信息、交易和消费记录、流水记录等，以及虚拟货币、虚拟交易、游戏类兑换码等虚拟财产信息；

Personal Financial Information: Including bank account numbers, identification information (passwords, PINs), deposit information (including amount of funds, payment and receipt records, etc.), real estate information, credit records, credit information, transaction and consumption records, account activities, as well as virtual currency, virtual transactions, game exchange codes, and other virtual property information;

- (B) 个人生理和心理健康信息：包括个人因生病医治等产生的相关记录，如病症、住院单、医嘱单、检验报告、手术及麻醉记录、护理记录、用药记录、药物食物过敏信息、生育信息、过往病史、诊治情况、家族病史、现病史、传染病史等，以及与个人生理和心理健康状况产生的相关信息等；

Personal Health Information: Includes records related to personal medical treatment such as conditions, hospital stays, medical orders, test reports, records of surgery and anesthesia, nursing records, medication records, information on drug and food allergies, reproductive information, medical history, treatment details, family medical history, current illness history, infectious disease history, and other information related to an individual's physical and mental health condition;

- (C) 个人生物识别信息：个人基因、指纹、声纹、掌纹、耳廓、虹膜、面部识别特征等；

Personal Biometric Information: Personal genetic data, fingerprints, voiceprints, palm prints, ear shapes, iris patterns, facial recognition features, etc.;

- (D) 个人身份信息：身份证、军官证、护照、驾驶证、工作证、社保卡、居住证等；

Personal Identification Information: Identification card, military ID, passport, driving license, work permit, social security card, residence permit, etc.;

- (E) 网络身份标识信息：系统帐号、邮箱地址及前述有关的密码、口令、口令保护答案、用户个人数字证书等；

Online Identity Markers: System accounts, email addresses, and associated passwords, PINs, security question answers, personal digital certificates, etc.;

- (F) 其他信息：个人电话号码、性取向、婚史、宗教信仰、未公开的违法记录、通信记录和内容、行踪轨迹、网页浏览记录、住宿信息、精准定位信息等。

Other Information: Personal phone numbers, sexual orientation, marital history, religious beliefs, undisclosed criminal and legal records, communication records and contents, whereabouts, web browsing history, accommodation information, precise location data, etc.

个人数据包含（但不限于）个人敏感数据。

Personal data includes, but is not limited to, personal sensitive data.

- 4.3 **特殊类型的个人数据**：指种族、族裔、政治观点、宗教信仰、工会成员身份、基因数据、生物识别数据，有关健康、性生活或性取向的数据，以及有关刑事犯罪和违法记录的数据。

Special Categories of Personal Data: Refers to data on racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data,

biometric data, data concerning health, sex life or sexual orientation, and data relating to criminal convictions and offenses or related security measures.

- 4.4 **数据主体**: 指通过个人数据可识别的该个人数据相关联的自然人。

Data Subject: Refers to the natural person who can be identified by the associated personal data.

- 4.5 开立仅持有为开立的合法业务经营目的, 所必须收集及处理的个人数据。

SonoScape only holds personal data that is necessary for the lawful business purposes of SonoScape's operations, which must be collected and processed.

5. 处理个人数据

Processing Personal Data

- 5.1 **处理**: 指对个人数据进行的任何操作, 包括但不限于收集、存储、使用、披露、传输、转移或删除。某主体的数据如果可以被接收方访问到, 那么也视为数据**转移**到接收方。

Processing: Refers to any operation or set of operations performed on personal data, including but not limited to collecting, storing, using, disclosing, transmitting, transferring, or deleting. If the data of a subject can be accessed by the recipient, then the data is also considered transferred to the recipient.

- 5.2 开立仅为如下目的在必要的限度内处理个人数据:

SonoScape processes personal data only to the extent necessary for the following purposes:

- (A) 为履行与第三方 (包括但不限于开立的客户、合作方以及关联方) 的合同或其他约定安排; 或行使前述合同或其他约定安排项下的权利或义务;

To fulfill contracts or other agreed arrangements with third parties (including but not limited to SonoScape's customers, partners, and affiliates); or to exercise the rights or obligations under the aforementioned contracts or other agreed arrangements;

- (B) 为管理开立分、子公司, 按照深圳开立生物医疗科技股份有限公司与分子公司之间的合同;

To manage the branches and subsidiaries of SonoScape, in accordance with the contracts between SonoScape Medical Corp. and its subsidiaries;

- (C) 经营管理开立的业务及项目; 和

To operate and manage the business and projects of SonoScape; and

- (D) 履行法律规定的义务。

To fulfill obligations stipulated by law.

除上述目的之外, 任何开立成员不得处理个人数据。

Beyond the aforementioned purposes, no member of SonoScape shall process personal data.

- 5.3 开立可能为第 5.2 所述目的在开立内部共享个人数据。如果适用法律对此披露有其他要求（比如获得数据主体的明确同意），则开立在满足该法律条件之后，才能内部披露及共享个人数据。

SonoScape may share personal data within SonoScape for the purposes described in 5.2. If applicable laws impose additional requirements for such disclosure (e.g., obtaining explicit consent from the data subject), then SonoScape may only disclose and share personal data internally after fulfilling those legal conditions.

任何开立成员不得将个人数据披露给就该个人数据的处理目的而言无需知悉的其他开立成员。

No member of SonoScape shall disclose personal data to other members of SonoScape who do not need to know such personal data for the purpose of its processing.

6. 个人数据保护原则

Principles of Personal Data Protection

- 6.1 开立成员处理个人数据，必须遵守下述原则：

When processing personal data, SonoScape members must adhere to the following principles:

- (A) **合法、公平和透明。** 个人数据应得到公平、透明和合法的处理。除非有法律允许的理由（见第 7 条和第 8 条），否则不得处理任何个人数据。在向数据主体收集个人数据之前，应告知数据主体处理其个人数据的原因和方式。

Lawfulness, Fairness, and Transparency. Personal data must be processed in a manner that is fair, transparent, and lawful. Unless there is a legally permissible reason (see Sections 7 and 8), personal data must not be processed. Data subjects should be informed of the reasons and methods for processing their personal data before it is collected from them.

如果开立向数据主体收集特殊类型的个人数据，则不仅要在收集之前告知数据主体处理其个人数据的原因和方式，还要获得数据主体的“明示”同意。

If SonoScape collects special categories of personal data from data subjects, it must not only inform the data subjects of the reasons and methods for processing their personal data prior to collection but also obtain the data subject's "explicit" consent.

- (B) **目的限制。** 仅可出于特定和合法目的处理个人数据；不得超出前述目的处理个人数据。

Purpose Limitation. Personal data can only be processed for specific and lawful purposes; it must not be processed beyond these purposes.

- (C) **数据最少化。** 为实现个人数据处理的目的，仅处理适当、相关且必要的最小范围的个人数据。

Data Minimization. Only the minimum amount of personal data necessary for the purposes of processing should be processed, ensuring it is adequate, relevant, and limited to what is necessary.

- (D) **准确性。** 个人数据应当准确且（如必要）保持更新。不准确的个人数据必须尽快纠正。

Accuracy. Personal data must be accurate and, where necessary, kept up to date. Any inaccurate personal data must be corrected without delay.

- (E) **数据保存。** 个人数据的保存期限不得长于为实现处理目的所需的必要期限。

Storage Limitation. The storage period for personal data must not exceed the necessary period required to fulfill the purposes of processing.

- (F) **数据主体权利。** 在处理个人数据时，应当尊重数据主体的权利。数据主体有权要求查看其个人数据的副本，纠正其个人数据存在的错误，拒绝和撤回对其个人数据的处理同意，要求开立成员删除其个人数据。

Rights of the Data Subject. The rights of data subjects must be respected in the processing of personal data. Data subjects have the right to request a copy of their personal data, correct any inaccuracies in their personal data, refuse and withdraw consent to the processing of their personal data, and request the deletion of their personal data by SonoScape members.

- (G) **安全性。** 个人数据应当采取适当的技术和组织措施，保护个人数据不受任何未经授权或非法的处理、意外丢失、损坏和毁损。

Security. Appropriate technical and organizational measures must be taken to protect personal data against any unauthorized or unlawful processing, accidental loss, destruction, or damage.

- (H) **数据跨境转移。** 个人数据和重要数据的跨境转移应当符合转出国、转入国的相关适用法律。对于来源于欧洲经济区的个人数据，原则上不得转移至欧洲经济区以外的国家或地区，除非该国家或地区对数据主体关于个人数据处理活动的权利和自由给予与欧盟同等的保护水平。开立成员在中国境内收集及获取的个人数据和重要数据，原则上应存储在境内；如因业务需要，确须向境外提供的，应当进行安全评估。

Cross-Border Data Transfer. The cross-border transfer of personal data and important data must comply with the relevant applicable laws of the country of origin and the receiving country. For personal data originating from the European Economic Area, in principle, it must not be transferred to countries or regions outside the European Economic Area unless the country or region provides a level of protection for the rights and freedoms of data subjects regarding the processing of personal data that is equivalent to that of the EU. Personal and important data collected and acquired by SonoScape members within China should, in principle, be stored domestically; if it is necessary for business purposes to provide it overseas, a security assessment must be conducted.

- (I) **责任。** 开立及开立成员受本制度约束，在收集和处理个人数据时必须遵守本制度的规定。

Accountability. SonoScape and its members are bound by this Protocol and must comply with its provisions when collecting and processing personal data.

7. 处理个人数据的依据

Basis for Processing Personal Data

- 7.1 开立成员可基于合法理由处理个人数据。本条列举了与开立及开立成员处理个人数据活动相关的、可以被援引的合法理由。

Members of SonoScape may process personal data based on lawful grounds. This clause enumerates the lawful grounds that can be invoked for the activities related to the processing of personal data by SonoScape and its members.

- 7.2 非特殊类型的个人数据

Non-Special Categories of Personal Data

所有不属于特殊类型的个人数据，下述任一理由可以作为处理这类数据的合法理由：

For all personal data that does not belong to special categories, any of the following reasons can serve as a lawful basis for processing such data:

- (A) 数据主体已就个人数据处理做出了同意，具体见第 8 条规定；

The data subject has given consent to the processing of their personal data, as specified in Section 8;

- (B) 处理活动符合开立成员的合法权益，且不会导致数据主体遭受不合理的损害；

The processing activity is in the legitimate interests of the SonoScape member and does not subject the data subject to unreasonable harm;

- (C) 处理活动是开立成员为了履行其与数据主体之间的合同所必须的，或是开立成员经数据主体请求、为订立前述合同所必须的；或

The processing activity is necessary for the performance of a contract to which the data subject is party, or in order to take steps at the request of the data subject prior to entering into a contract;

- (D) 依据法律要求进行的处理活动。

The processing is required by law.

- 7.3 特殊类型的个人数据

Special Categories of Personal Data

特殊类型的个人数据的处理受限于更为严格的法律监管。下述理由可以作为处理这类数据的合法理由：

The processing of special categories of personal data is subject to stricter legal regulation. The following reasons can serve as lawful grounds for processing such data:

- (A) 数据主体已就个人数据处理做出了“明示的”同意，具体见第 8 条规定；

The data subject has given “explicit” consent to the processing of their personal data, as specified in Section 8;

- (B) 处理活动是经法律允许或依据依法签订的集体劳动合同规定，为保护数据主体基本权利和权益，开立或数据主体在劳动、社保相关法律项下履行义务或行使权利所必需的；

The processing is necessary for carrying out obligations or exercising specific rights of SonoScape or the data subject in the field of employment and social security and social protection law, in so far as it is authorized by law or a collective agreement providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

- (C) 依据法律规定或与健康医疗机构或人员的合同约定，为防治职业病、评估员工的工作能力、医疗诊断、提供和管理社保和医疗保险以及相关治疗的目的；

Processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment, or the management of health or social care systems and services on the basis of law or pursuant to contract with a health professional;

- (D) 为公平机会的目的，即有必要进行处理活动以识别并持续监督不同种族或人种是否得以享有公平的待遇和机遇，并促进或维持这种公平性；

Processing is necessary for the purposes of ensuring equality and diversity in the workplace with regard to racial or ethnic origin, to monitor equality of opportunity or treatment, and to promote or maintain equality and diversity;

- (E) 处理活动是为了实现法律程序、获得法律建议或确立、行使或维护法定权利而必须的。

Processing is necessary for the establishment, exercise, or defense of legal claims or whenever courts are acting in their judicial capacity.

8. 数据主体的同意

Consent of the Data Subject

- 8.1 如第 7.2(A)、7.3(A)所规定的，数据主体同意是一种重要的处理个人数据的合法理由。在援引数据主体同意作为处理个人数据的合法理由时，要确保数据主体的同意满足下述所有条件：

As stipulated in 7.2(A) and 7.3(A), the consent of the data subject is an important lawful basis for processing personal data. When invoking the consent of the data subject as the lawful basis for processing personal data, it is essential to ensure that the consent meets all of the following conditions:

- (A) 同意必须限于特定的处理活动；

Consent must be given for specific processing activities;

- (B) 开立成员已充分告知数据主体有关数据处理活动的细节，确保数据主体充分了解其所做出同意的具体内容；

The member of SonoScape must fully inform the data subject about the details of the processing activities, ensuring that the data subject fully understands the specifics of the consent given;

- (C) 同意必须是“自愿做出”的，即数据主体有权自由决定是否同意。如存在“严重权力失衡”的情形，即数据主体没有机会自由做出选择或如果不同意会受到重大不利的影响，则不是“自由做出”的同意；

Consent must be “freely given,” meaning the data subject has the right to make a free decision whether to consent. If there is a “significant imbalance of power,” meaning the data subject has no real freedom of choice or would suffer significant detriment if they do not consent, then the consent is not considered “freely given” ;

- (D) 不得把要求数据主体同意数据处理作为开立成员履行（和数据主体之间的）合同或（向数据主体）提供服务的前提条件，除非该数据处理是为履行前述合同或提供前述服务目的所必需进行的；

Requesting consent from the data subject for data processing cannot be a precondition for the performance of a contract with the data subject or for the provision of services to the data subject, unless the data processing is necessary for the performance of the said contract or the provision of the said services;

- (E) 同意应当由数据主体以清晰明确的声明或其他清晰、主动的方式做出，例如签署书面声明。不得通过数据主体的沉默或不作为推断其作出同意（例如，使用事先已勾选的同意方框）；

Consent must be made by the data subject through a clear and affirmative statement or other clear, proactive action, such as signing a written statement. Consent should not be inferred from silence or inactivity of the data subject (for example, using pre-checked consent boxes);

- (F) 开立成员要求数据主体针对个人数据处理所做出的同意，应当与要求数据主体做出同意的其他事项明确分离（例如，同意个人数据处理的条款不得隐藏于数据主体签署的其他涉及更为广泛内容的合同条款之中）。

Consent requested by a member of SonoScape for processing personal data should be clearly distinguished from other matters for which consent is sought (for example, terms for consent to process personal data should not be hidden within other contractual terms involving broader content that the data subject signs).

- 8.2 开立成员应当对数据主体对于处理其个人数据的同意进行记录，以便证明开立成员已获得数据主体的同意、有权处理数据主体的个人数据。

Members of SonoScape should keep records of the data subject’s consent to the processing of their personal data to demonstrate that consent was obtained, authorizing them to process the personal data of the data subject.

- 8.3 数据主体有权在任何时候撤回其同意，数据主体撤回同意的难度不得高于其一开始做出同意的难度。数据主体撤回其同意后，开立成员应：

The data subject has the right to withdraw their consent at any time, and the process for withdrawing consent should not be more difficult than the process for giving it. Upon the data subject's withdrawal of consent, the member of SonoScape should:

- (A) 立即或尽快停止处理个人数据;

Immediately or as soon as possible cease the processing of personal data;

- (B) 除非有法律另行允许的理由且经数据保护官同意, 尽快删除个人数据。

Unless there are other legally permissible reasons approved by the data protection officer, delete the personal data as soon as possible.

9. 高风险处理活动

High-Risk Processing Activities

- 9.1 当个人数据的处理活动可能对数据主体产生“高风险”时, 开立成员在进行处理活动之前, 应将拟进行的数据处理活动提交数据保护官, 对数据主体的权利和自由所可能产生的影响开展评估。

When the processing of personal data is likely to result in a "high risk" to the data subjects, members of SonoScape should, before proceeding with the processing activities, submit the planned data processing activities to the Data Protection Officer for an assessment of the potential impacts on the rights and freedoms of data subjects.

- 9.2 “高风险”的数据处理活动指将严重侵犯数据主体隐私的处理活动: 如对数据主体的监控和用户画像、大规模处理个人敏感数据、大规模处理特殊类型的个人数据、涉及监控个人线上线下位置或行为的数据处理、使用新技术或使用自动决策机制做出对个人具有重大影响的决定等情形。

"High risk" data processing activities refer to those processing activities that may severely infringe upon the privacy of data subjects, such as monitoring and profiling of data subjects, large-scale processing of sensitive personal data, large-scale processing of special categories of personal data, processing involving monitoring personal locations or behaviors online and offline, the use of new technologies, or making significant decisions about individuals through automated decision-making mechanisms.

10. 公平处理信息

Fair Processing Information

- 10.1 任何收集个人数据的文件(无论是纸质或电子形式), 均应当包含相关说明, 解释所收集的个人信息将如何使用、将披露给谁。

Any document collecting personal data, whether in paper or electronic form, should include relevant explanations on how the collected personal data will be used and to whom it will be disclosed.

- 10.2 无论是从数据主体还是从第三方处获取的数据主体的个人信息, 数据主体都应该获得与拟处理其个人信息有关的信息。如果个人信息是从数据主体处获得的, 开立成员应该在获取前, 告知数据主体与拟处理其个人信息有关的信息; 如果个人信息是从第三方处获

得的，则在获得后的合理时间内、或在同数据主体进行首次联络时（以较早者为准），开立成员应告知数据主体与处理其个人数据有关的信息。

Data subjects should be informed about information related to the processing of their personal data, regardless of whether the personal data is obtained from the data subject or a third party. If personal data is obtained directly from the data subject, members of SonoScape should inform the data subject about information related to the processing of their personal data before it is collected; if personal data is obtained from a third party, then members of SonoScape should inform the data subject about information related to the processing of their personal data within a reasonable period after obtaining the data, or at the time of the first contact with the data subject, whichever is earlier.

10.3 开立成员为处理个人数据目的，向数据主体提供的信息应当包括下述内容：

The information provided by SonoScape members to data subjects for the purpose of processing personal data should include the following content:

(A) 开立成员主体信息以及联络信息；

The identity and contact details of the SonoScape member;

(B) 开立成员收集的个人数据的类别；

The categories of personal data collected by the SonoScape member;

(C) 个人数据来源的第三方信息；

Information about third parties from whom the personal data is sourced;

(D) 处理个人数据的目的、处理活动的依据（第7条）；

The purpose of processing personal data, the basis for the processing activities (as per Article 7);

(1) 如果依据的是“合法权益”，应具体说明哪种合法权益；

If the basis is "legitimate interests," the specific legitimate interests should be detailed;

(2) 如果依据的是数据主体的同意，应当向数据主体说明，数据主体享有在任何时间撤回同意的权利；

If the basis is the consent of the data subject, it should be explained to the data subject that they have the right to withdraw their consent at any time;

(3) 如果依据的是为履行开立成员和数据主体之间的合同所必须，告知数据主体提供个人数据的必须性，以及如果不提供、可能产生的后果。

If the basis is the necessity for the performance of a contract between the SonoScape member and the data subject, the necessity of providing personal data and the potential consequences of not providing it should be communicated to the data subject.

- (E) 可能向第三方披露的个人数据类别、披露的原因；

The categories of personal data that may be disclosed to third parties, and the reasons for such disclosure;

- (F) 将个人数据转移至其他国家或地区的意向（包括将来源于欧洲经济区的个人数据转移至欧洲经济区以外区域），被转移的个人数据在接收国家或地区的保护水平，是否满足数据跨境转移相关法律要求；

The intention to transfer personal data to other countries or regions (including transferring personal data originating from the European Economic Area to outside the European Economic Area), the level of protection of personal data in the receiving country or region, and whether it meets the legal requirements for cross-border transfer of data;

- (G) 是否存在针对这些个人数据进行自动决策（例如用户画像），如果有，自动决策所遵循的规则、及对于数据主体可能产生的影响；

Whether there is any automated decision-making regarding such personal data (e.g., profiling), and if so, the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject;

- (H) 个人数据的保存期限；如果不能明确期限，则应说明用于确定期限的标准；

The retention period for personal data; if a specific period cannot be provided, the criteria used to determine that period should be explained;

- (I) 开立成员保护个人数据保密性和安全性的制度及实践的一般性说明；

A general description of the measures and practices for ensuring the confidentiality and security of personal data by SonoScape members;

- (J) 数据主体的权利；和

The rights of the data subject; and

- (K) 为保证个人数据处理公平性所必需的任何其他信息。

Any other information necessary to ensure the fairness of the processing of personal data.

- 10.4 上述信息的提供方式必须准确、透明、可理解且易于获取，使用清晰、易懂的用语，确保数据主体能够充分理解。

The method of providing the above information must be accurate, transparent, understandable, and easily accessible, using clear and plain language to ensure that data subjects can fully comprehend it.

- 10.5 如果上述任何信息在提供给数据主体之后发生变更，开立成员应当向数据主体发送信息更新后的版本。

Should any of the aforementioned information change after being provided to the data subjects, members of SonoScape must send the data subjects the updated version of the information.

11. 数据披露

Data Disclosure

- 11.1 开立成员必须确保个人数据不会披露给未经授权的第三方。在向第三方披露任何个人数据时，所有开立成员应当审慎处理。

Members of SonoScape must ensure that personal data is not disclosed to unauthorized third parties. All members of SonoScape should exercise caution when disclosing any personal data to third parties.

- 11.2 未经数据保护官同意，不得以口头或书面形式将个人数据披露给任何第三方。

Personal data must not be disclosed to any third party, either verbally or in writing, without the consent of the Data Protection Officer.

- 11.3 法律允许在特定情形下，未事先获得数据主体同意仍然可以向第三方披露个人数据。这些特定情形包括：

The law allows for the disclosure of personal data to third parties in specific situations without prior consent from the data subject. These specific situations include:

- (A) 为保护国家安全所必需；

Where it is necessary for national security;

- (B) 为防止或侦察犯罪目的，若征求数据主体同意将阻碍上述目的实现；

For the purposes of preventing or investigating crimes, if seeking consent from the data subject would impede these objectives;

- (C) 为司法管理或应对司法诉讼行为所必需；

Where it is necessary for judicial administration or responding to judicial proceedings;

- (D) 为遵守法律所必需；

Where compliance with the law is necessary;

- (E) 为保护数据主体的重要利益（仅指严重威胁人身安全的情形）所必需的，但仅在无法获得数据主体同意的情况下适用。

Where it is necessary to protect the vital interests of the data subject (only applicable in situations of serious threat to the physical integrity of a person), but only when the consent of the data subject cannot be obtained.

- 11.4 第三方如要求从开立获得个人数据，应提供数据主体同意的相关文件，或者存在法定的允许披露情形。

Third parties requesting personal data from SonoScape must provide documentation of the data subject's consent or demonstrate that there is a legal basis for disclosure.

12. 数据的跨境转移

Cross-Border Transfer of Data

- 12.1 开立成员如果将个人数据和重要数据跨境转移，应当遵守数据转出国与转入国、地区的数据保护法律，确保个人数据、重要数据及数据主体的权利得到充分保护。**跨境转移**包括开立成员自身进行的，或者聘用数据处理者进行的，将数据从一个国家或地区发送到另一国家或地区，或允许另一国家或地区的接收方远程访问该数据。

Members of SonoScape who transfer personal and critical data across borders must comply with the data protection laws of both the exporting and importing countries or regions, ensuring that personal data, critical data, and the rights of data subjects are fully protected. Cross-border transfer includes transfers conducted by SonoScape members themselves or by engaging data processors, sending data from one country or region to another, or allowing remote access to the data by recipients in another country or region.

- 12.2 开立成员在中国境内收集及获取的个人数据和重要数据，原则上应存储在中国境内。如因业务需要，确须向境外提供的，应当进行安全评估。重要数据的范围和安全评估的要求，按照开立《跨境数据转移指南》执行。

Personal and critical data collected and acquired by SonoScape members within China should, in principle, be stored within China. If it is necessary to provide the data overseas for business needs, a security assessment must be conducted. The scope of critical data and the requirements for security assessment shall follow the "Cross-Border Data Transfer Guidelines" issued by SonoScape.

- 12.3 开立成员将来自欧洲经济区的个人数据向欧洲经济区以外的区域转移的，应遵循GDPR的以下特定法律要求，确保接收国家或地区能够使数据主体的权利和自由受到同等水平的充分保护：

When SonoScape members transfer personal data from the European Economic Area (EEA) to regions outside the EEA, they must follow the specific legal requirements of the GDPR to ensure that the receiving country or region can offer data subjects a level of protection that is essentially equivalent to that guaranteed within the EEA:

- (A) 接收国家/地区已获得欧盟委员会的“同等保护”认定；

The receiving country/region has been deemed to provide an "adequate level of protection" by the European Commission;

- (B) 开立成员与欧洲经济区以外的数据接收方签署跨境数据转移协议，该协议包含由欧盟委员会核准的标准合同条款；或

SonoScape members have signed cross-border data transfer agreements with the data recipients outside the EEA, which include standard contractual clauses approved by the European Commission; or

- (C) 接收方位于美国并已获得“欧盟-美国隐私避风港计划”认证。

The recipient is in the United States and has been certified under the "EU-US Privacy Shield Framework.

12.4 任何开立成员在跨境转移数据之前，应确保符合 12.1-12.3 条中规定的法律要求。

Any member of SonoScape, before transferring data across borders, must ensure compliance with the legal requirements set out in sections 12.1-12.3.

13. 数据保存与处置

Data Retention and Disposal

13.1 个人数据的保存时间不得长于为实现数据处理目的所需的必要时间。开立成员处理的各类个人数据必须依据其处理目的和合法依据，设定合理的保存期限。开立成员应当检测个人数据保存期限，在期限结束后删除或匿名化处理个人数据，从而确保无法通过该数据识别相关的数据主体。

The retention period of personal data must not exceed the necessary duration required to achieve the purpose of data processing. SonoScape members must set reasonable retention periods for the various types of personal data they process, based on the processing purposes and legal bases. SonoScape members should monitor the retention periods for personal data and delete or anonymize the personal data after the end of the period, thereby ensuring that the related data subjects cannot be identified through that data.

13.2 例如，绝大部分开立保存的员工信息是为了管理开立与该员工的雇佣关系（例如为了支付工资需要保存员工的银行账户信息），在员工离开开立之后，

For instance, the majority of the employee information retained by SonoScape is for managing the employment relationship with that employee (e.g., to pay wages, it is necessary to retain the employee's bank account information). After an employee leaves SonoScape:

(A) 开立不应再保存与该员工有关的所有信息；应删除那些为了履行雇佣关系所必需的个人数据；

SonoScape should no longer retain all information related to that employee; it should delete those personal data necessary to fulfill the employment relationship;

(B) 某些该员工的个人数据可能可以基于合法理由（比如为了公司履行某些法定义务所必需）而延长保存期限；

Some personal data of the employee may be retained for an extended period based on lawful grounds (e.g., for the company to fulfill certain legal obligations);

(C) 对于应该删除的个人数据，开立应永久删除，例如进行粉碎处理、作为保密垃圾销毁，将电子数据永久删除。该员工曾经使用的计算机硬盘应当清空和格式化处理。

For personal data that should be deleted, SonoScape should permanently delete it, for example, by shredding, disposing of as confidential waste, or permanently deleting electronic data. Hard drives of computers used by the employee should be wiped and formatted.

14. 数据保护与数据安全

Data Protection and Security

14.1 开立采用充分的技术和制度方法保护其持有和保存的个人数据。

SonoScape employs sufficient technical and organizational methods to protect the personal data it holds and maintains.

14.2 开立在处理个人数据时应遵守下述规定：

When processing personal data, SonoScape must adhere to the following regulations:

- (A) 无论保存方式（电子还是纸质），开立成员必须始终安全保存个人数据。开立成员应当确保采取充分的技术和组织安全措施，确保在处理个人数据时（包括但不限于在数据保存或传输中），不受未经授权或意外的访问、使用、披露、丢失或损坏的影响。

Regardless of the storage method (electronic or paper), SonoScape members must always securely store personal data. SonoScape members must ensure that adequate technical and organizational security measures are taken to protect personal data during its processing (including, but not limited to, storage or transmission), from unauthorized or accidental access, use, disclosure, loss, or damage.

前述技术措施包括但不限于使用加密工具保护电子形式保存的个人数据。前述组织安全措施包括但不限于将包含个人数据的纸质记录储存于上锁的柜子中。

The aforementioned technical measures include, but are not limited to, the use of encryption tools to protect electronically stored personal data. The aforementioned organizational security measures include, but are not limited to, storing paper records containing personal data in locked cabinets.

- (B) 如果出现个人数据丢失、损坏、泄露、滥用、被盗，或被未经授权处理的情况，开立成员应当立即将该情况报告数据保护官。

In the event of personal data being lost, damaged, leaked, misused, stolen, or processed without authorization, SonoScape members must immediately report the incident to the Data Protection Officer.

- (C) 根据第 14 条的规定，采用充分的安全措施保存、删除和处置个人数据。

Adequate security measures must be adopted for storing, deleting, and disposing of personal data, in accordance with Article 14.

- (D) 除根据第 11 条、第 12 条披露个人数据的情形以外，不得披露任何个人数据。

Any personal data must not be disclosed, except in the situations outlined in Articles 11 and 12.

- (E) 开立其他相关制度。

Other relevant SonoScape policies.

15. 第三方服务供应商

- 15.1 开立指示第三方（**数据处理者**）代表开立处理个人数据的，第三方必须与开立订立书面协议，且协议中应包含如下事项：

When SonoScape instructs a third party (data processor) to process personal data on behalf of SonoScape, a written agreement must be entered into with the third party, which should include the following:

- (A) 列明数据处理者根据开立指示处理的个人数据的详细信息；

Detailed information about the personal data that the data processor will be processing on SonoScape's instructions;

- (B) 要求第三方仅可根据开立的书面指示处理个人数据，且仅限于第三方为履行其根据上述协议向开立承担的义务所需的范围；

A requirement that the third party may only process personal data based on SonoScape's written instructions, and only to the extent necessary for the third party to fulfill its obligations under the said agreement to SonoScape;

- (C) 要求第三方采取适当的技术、组织和控制措施，确保个人数据的保密性和安全性；

A requirement for the third party to adopt appropriate technical, organizational, and control measures to ensure the confidentiality and security of personal data;

- (D) 规定法律所要求的其他数据处理义务。

Any other data processing obligations required by law.

- 15.2 在将任何个人数据传输至数据处理者之前，应当签署经公司法务部门及使用部门、项目运营组核准的数据处理协议。

Before any personal data is transferred to the data processor, a data processing agreement approved by the company's legal department and the using department/project operation group must be signed.

- 15.3 开立应当在与数据处理者确立合作关系时、以及合作关系持续期间，定期对数据处理者进行适当的尽职调查，确保数据处理者能够且切实遵守 15.1 (B) 项至 (D) 项所规定的要求。

SonoScape should conduct appropriate due diligence on the data processor at the time of establishing the cooperative relationship and periodically throughout the duration of the relationship, to ensure that the data processor is capable of and actually complies with the requirements set out in sections 15.1(B) to (D).

16. **数据主体权利**

Rights of the Data Subject

- 16.1 数据主体有权行使其对个人数据的权利，包括：

Data subjects have the right to exercise their rights regarding their personal data, including:

- (A) 获取其个人数据有关的信息；

To be informed about their personal data;

(B) 访问开立所持有（或他人代表开立成员持有）的其个人数据；

To access their personal data held by SonoScape (or on behalf of SonoScape by others)

(C) 获取开立持有的其个人数据副本；

To obtain a copy of their personal data held by SonoScape;

(D) 要求开立更正不准确或不完整的个人数据；

To request SonoScape to correct inaccurate or incomplete personal data;

(E) 在特定情形下，请求开立删除其个人数据。包括（但不限于）下述情形：

In certain circumstances, to request SonoScape to delete their personal data. This includes (but is not limited to) situations where:

(1) 开立无需为收集个人数据时的原因而继续保存该个人数据的；

The personal data is no longer necessary for the reasons it was collected for by SonoScape;

(2) 开立仅有权在获得数据主体同意的情况下处理其个人数据（即不适用处理个人数据的其他合法理由），而数据主体撤回其同意的；

SonoScape's right to process the personal data was based solely on the data subject's consent (i.e., no other lawful basis applies), and the data subject withdraws that consent;

(F) 向数据保护官投诉开立侵犯其个人数据相关权利。

To lodge a complaint with the Data Protection Officer if they believe SonoScape has infringed their rights concerning their personal data.

16.2 开立成员应将收到的数据主体关于上述权利的请求立即递交数据保护官，由数据保护官审核并安排具体部门人员，处理数据主体的请求，处理结果由数据保护官审核并统一回复数据主体。

Members of SonoScape should forward any requests received from data subjects regarding the above rights immediately to the Data Protection Officer. The Data Protection Officer will review and assign specific department personnel to address the data subject's request. The Data Protection Officer will review the outcomes and respond to the data subject collectively.

17. 保存记录

Record Keeping

17.1 开立必须准确记录其进行的主要数据处理活动，并定期更新。这些记录应包括：

17.1 SonoScape must accurately document and routinely update its main data processing activities. These records should encompass:

(A) 数据处理的目的；

The purposes of the data processing;

(B) 数据主体的类别；

The categories of data subjects;

(C) 个人数据接收方的类别；

The categories of recipients of the personal data;

(D) 将个人数据传输至数据产生地以外的其他国家/地区；

Transfers of personal data to countries or regions outside of the data's origin

(E) 个人数据的预计保存期限；

The expected retention periods for the personal data;

(F) 开立的相关技术和组织安全措施。

The relevant technical and organizational security measures employed by SonoScape.

17.2 数据保护主管部门应当就开立的个人数据处理活动进行监督。开立成员进行任何新的数据处理活动、或对现有处理活动做的重大变更，必须立即通知数据保护主管部门。

The Data Protection Department within SonoScape should monitor the organization's personal data processing activities. Any new data processing activities or significant changes to existing processing activities undertaken by SonoScape members must be promptly reported to the internal Data Protection Department.

18. 职责与责任

Responsibilities and Liabilities

18.1 开立数据主管部门，负责：

The Data Protection Department of SonoScape is responsible for:

(A) 确保开立各董事会了解公司的数据保护责任、风险和重大问题；

Ensuring that all members of the board of directors are informed of the company's data protection responsibilities, risks, and significant issues;

(B) 审核所有数据保护制度和流程；

Reviewing all data protection policies and procedures;

(C) 为员工安排个人数据保护培训和咨询；

Arranging data protection training and advice for employees;

(D) 处理员工的个人数据保护问询;

Handling employees' inquiries about data protection;

(E) 处理数据主体的访问和其他权利请求;

Processing data subjects' requests for access and other rights;

(F) 审批开立与数据处理商的协议;

Approving agreements with data processors for SonoScape;

(G) 确保用于存储个人数据的所有系统、服务和设备符合适当的安全标准要求，并定期检查;

Ensuring that all systems, services, and equipment used for storing personal data meet the appropriate security standards and are regularly inspected;

(H) 评估开立拟采购的存储或处理个人数据的第三方服务。

Assessing third-party services for storing or processing personal data that SonoScape intends to procure.

19. 数据保护主管机关

Data Protection Supervisory Authority

19.1 按照当地法律法规的要求，开立成员应当向所在地数据保护主管机关及时、足额支付当地法律规定的行政费用（如适用），并依据适用法律和实际业务需要，与数据保护主管机关保持联系沟通。

In accordance with local laws and regulations, members of SonoScape shall timely and fully pay the administrative fees stipulated by local laws (if applicable) and maintain communication with the data protection supervisory authority as required by applicable laws and actual business needs.

20. 附则

Supplementary Provisions

20.1 本制度自发布之日起生效，由开立法律与合规部负责解释。开立后续将制定及发布数据保护的配套实施办法及指引。

This regulation shall take effect from the date of issuance and be interpreted by the Legal and Compliance Department of SonoScape. SonoScape will subsequently develop and publish implementation methods and guidelines for data protection.