

## General Personal Information Collection Statement of Shanghai Ethypharm

### 爱的发个人信息收集声明

Shanghai Ethypharm Pharmaceuticals Co. Ltd. ("Ethypharm", "the Company" or "us") commits to comply with the Cybersecurity Law of the P.R.C., the Personal Information Protection Law of the P.R.C. and other applicable laws and regulations in relation to personal information protection, and takes all reasonable and practical measures to safeguard your personal information from unauthorized or illegal access, processing or use during collection, storage, use, processing, transfer, provision, disclosure and/or deletion, etc. (collectively referred to as "processing" or "process"). This Statement is intended to inform you of your and Ethypharm's rights and obligations in processing of your personal information, and to specify the purpose, method and scope of processing of such personal information.

上海爱的发制药有限公司（简称“爱的发”、“公司”或“我们”）致力于遵守《中华人民共和国网络安全法》、《中华人民共和国个人信息保护法》等与个人信息保护相关的适用法律法规的规定，采取必要合理措施，确保您的个人信息在被收集、存储、使用、加工、传输、提供、公开、删除等（以下统称“处理”）过程中，不会在未经授权的情况下或适用法律法规所规定的范围外被查阅、处理或作其他用途。本声明旨在告知您有关爱的发和您关于个人信息处理时的权利和义务，明示处理上述个人信息的目的、方式和范围。

Our processing scenarios may include sensitive personal information. **Sensitive personal information refers to the personal information that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used, including such information as biometric identification, religious belief, specific identity, medical health, financial account and whereabouts and tracks, as well as the personal information of minors under the age of 14.** We will process sensitive information only for a specific purpose and sufficient necessity, and when strict protection measures have been taken. The sensitive personal information covered by this privacy policy is marked in bold in Section 1 "Collection and Use of Your Personal Information" below. We will process sensitive personal information in the context of Section 1, and such processing will not have a significant adverse impact on your rights.

我们的处理场景可能包括敏感个人信息。**敏感个人信息**是一旦泄露或者非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满 14 周岁未成年人的个人信息。我们将在具有特定的目的和充分的必要性，并采取严格保护措施的情形下，处理您的敏感个人信息。我们在下文第 1 节“个人信息的收集与使用”中对所涉及的敏感个人信息进行加粗标记。我们将在第 1 节所述场景下处理敏感个人信息，该等处理不会对您的权益造成重大不利影响。

Ethypharm values the protection of personal information of minors and we have developed an independent Personal Information Protection Statement for Minors. Unless otherwise stipulated by relevant laws and regulations, Ethypharm will only process the information of minors under the age of 14 provided by you with your consent as a parent or guardian.

爱的发重视对未成年人个人信息的保护，我们制定了单独的《未成年人个人信息保护声明》。除非相关法律法规另有规定，爱的发仅在已取得您作为家长或监护人的有效授权同意的前提下，处理由您提供的 14 周岁以下的未成年人个人信息。

When you provide Ethypharm of personal information relating to other individuals, you are obligated to comply with its obligations arising from applicable data protection or privacy laws in force from time to time, including but not limited to (i) any obligation to ensure the personal information of others provided to us by you is legitimate and you have obtained all necessary consents from them in respect of such transfer to Ethypharm; (ii) any obligation for you to notify them of Ethypharm's processing of personal information as necessary to carry out our obligations under services and/or potential services of Ethypharm; and (iii) any obligation for you to safeguard their rights to access, correct, and delete their personal information, etc.

当您向爱的发提供其他人的个人信息时，您需确保遵守不时适用的任何数据保护或隐私法律的规定，包括但不限于：(i) 您有义务确保就您向爱的发传输的其他人的个人信息是正当合法的。如果按照法律规定需要征得其他个人信息主体同意的，您应确保已依法取得个人信息主体的同意；(ii) 您有义务向个人信息主体告知爱的发将为履行爱的发的业务和/或潜在业务的义务时而处理其个人信息；以及 (iii) 您有义务保障个人查阅、更正、删除其个人信息等的权利。

## 1. Collection and Use of Your Personal Information 个人信息的收集与使用

To carry out our business and/or potential business, including delivery of services and/or products, preparation of proposals, provision of quotations, managing claims, client relationship management, conducting internal conflicts checks, recruitment, medical information communication, or adverse reaction assessment, etc., we may process the personal information of you, who may be the contact person of our current or prospective client/vendor/partner, users who visit our websites or other official channel, job applicant, healthcare professional or patient, etc. Failure to provide personal information may result in Ethypharm being unable to provide you with the services, conduct business/recruitment interaction or other matters permitted or required by you or laws and regulations.

为了执行我们的业务和/或潜在业务，包括提供服务及/或产品、准备方案、提供报价、管理申诉、管理客户关系、进行利益冲突内部检查、招聘、医学信息交流、不良反应评估等，您作为我们现有或潜在客户/供应商/合作伙伴的联系人、访问我们网站等官方渠道的用户、求职者、医疗卫生专业人士/专家或者患者等角色时，我们可能处理您的个人信息。未能提供个人信息可能导致我们无法为您提供服务、进行业务/招聘互动、或开展您或法律法规允许/要求的其他事项。

- When you reach out to us through the "Contact Us" section of our official website or other channels, to address your questions/complaint, the personal information we may collect from you includes names, occupation, email addresses, phone numbers, purpose and message. If you are inquiring about medical information, for the purpose of responding to your medical inquiry, based on your message information, we may further collect patient's age, **patient's health and physiological information (including symptoms, diagnosis and treatment, doctor's advice, medication records, health and physiological status after medication, and intended medication information)** from you, which may also be directly provided by you in your first message.

当您通过我们官网的“联系我们”栏目或其他渠道联系我们时，出于处理您的问题、投诉的目的，我们可能收集您的姓名、职业、邮箱地址、电话号码、联系目的与留言信息。如您涉及医学信息问询，出于回应您的医学问询的目的，基于您的留言信息，我们还将向您收集患者年龄、患者健康生理信息（包括病症、诊治情况、医嘱、用药记录、用药后的健康生理状况、拟服用的药品信息），此类信息亦可能直接由您在首次留言信息中主动提供。

- When you report adverse drug events to us, in accordance with law, we will collect your phone number, occupation, email address, **signature**, the name of the reporting organization (e.g. hospital),

- the name and phone number of the contact person of the reporting organization, reporting date, correlation evaluation, and the personal information of the patient, including name, gender, date of birth/age, ethnicity, weight, contact information, **disease, name of hospital visited, medical record number/outpatient service number, relevant key information (e.g., history of smoking, alcohol use, pregnancy, liver disease, kidney disease, allergies), past adverse drug reactions/events, family adverse drug reactions/events, medication information, current adverse reaction/event (including occurrence time, symptoms, vital signs, clinical tests, treatment), result of adverse reactions/events, symptom after withdrawal/reduction/reuse of the drug, impact on the disease.**

当您向我们反馈不良反应事件时，我们将依法收集您作为报告人的电话号码、职业、邮箱地址、**签名**、报告单位名称（例如医院名称）、报告单位联系人姓名与电话号码、报告日期、关联性评价，以及被报告人（即患者）的姓名、性别、出生日期或年龄、民族、体重、联系方式、原患疾病、就诊的医院名称、病历号/门诊号、相关重要信息（例如：吸烟史、饮酒史、妊娠期、肝病史、肾病史、过敏史）、既往药品不良反应/事件、家族药品不良反应/事件、用药信息、当前不良反应/事件（包括发生时间、症状、体征、临床检验、处理情况）、不良反应/事件的结果、停药/减量/再使用之后的症状变化、对原患疾病的影响。

- When you send your job application to us through the "Talent Development" section of our official website or other channels, for the purpose of processing your job application, evaluating your candidate qualifications and conditions, or conducting background checks, we may collect your name, phone number, email address, resume, and other information you provide.

当您通过我们官网的“人才发展”栏目或其他渠道向我们投递简历时，出于处理您的工作申请、评估您的候选人资格和条件或进行背景调查的目的，我们可能收集您的姓名、电话、邮箱地址、简历以及您主动提供的其他信息。

- When you visit our office or factory as an external visitor, for security and reception purposes, we may collect your name, workplace, phone number, car plate number (if any), and entry/exit time of the factory. When you enter our video surveillance area, our video surveillance system may collect your **images and video information.**

当您作为我们的外部访客访问我们的办公室或工厂时，出于安保与接待的目的，我们可能收集您的姓名、工作单位、电话号码、车牌号码（如有）、进出工厂时间。当您进入我们的视频监控区域时，我们的视频监控系统将可能收集您的**图像与视频信息**。

- When you cooperate and communicate with us as a healthcare professional/expert, for the purpose of medical information exchange or hiring you as our consultant (including payment of remuneration, tax declaration purpose), we may collect your name, gender, workplace, job position, work department, name of the activity you take part in, contact information (such as telephone number, email address, WeChat ID or other social media account), **copy of ID card (PRC citizen)/passport number (foreigner), bank card information, and remuneration.** In the course of inviting you to participate in offline activities, we may also collect your home address information, public transportation information (**whereabouts**), and **lodging information (hotel stays)** for the purpose of picking you up and dropping you off. If you participate in our clinical trial research projects, for research project management purposes, we may also collect your curriculum vitae, training records (mainly GCP training records), **authorized signature form (signature/seal sample)**, information on doctors' professional certificates, nurses' registration certificates and practice information, pharmacists' professional information and certificates, and GCP certificate information.

当您作为医疗卫生专业人士/专家与我们开展合作、交流时，出于医学信息交流、聘请您作为我们的咨询顾问（含支付报酬、税务申报）的目的，我们可能收集您的姓名、性别、工作单位、职位、所在部门/科室、所参与的活动名称、联系方式（例如电话号码、邮箱地址、微信号等社交媒体账号）、**身份证复印件（中国籍）/护照号（外籍）、银行卡信息和报酬**。在邀请您参与线下活动的过程中，出于接送的目的，我们还可能收集您的家庭住址信息、公共交通信息（**行踪轨迹**）、**住宿信息（入住酒店）**。如您参与我们的临床试验研究项目，出于研究项目管理的目的，我们还可能收集您的简历、培训记录（主要是**GCP培训记录**）、**授权签字表（签字样章）**、医生职业证书信息、护士注册证书和执业信息、药师的职业信息和证书信息、GCP证书信息。

- When you are the contact person of our clients/vendors/partners/other third parties, for the purpose of business communication and relationship management, we may collect your name, gender, phone number, email address, fax number (if any), workplace, work department, and job position.

当您作为我们客户/供应商/合作伙伴/其他第三方的联系人时，出于业务交流、业务关系管理的目的，我们可能收集您的姓名、性别、电话号码、邮箱地址、传真号码（如有）、工作单位、所在部门、职位。

- When you are the medical representative of our contract sales organizations, for the purpose of fulfilling the legal obligation on the filing of medical representatives, we will collect your name, gender, **ID card number**, education degree and major before you engage in the information transmission, communication and feedback for our drugs.

当您作为我们的合同销售外包服务商的医药代表时，在您从事爱的发药品信息的传递、沟通、反馈事务前，出于履行法律法规关于医药代表备案的义务，我们将收集您的姓名、性别、**身份证件号码**、学历、专业。

We may also collect your personal information from third parties, such as your employer, your service/product providers. Such third parties will inform you, obtain your consent or fulfill other legal obligations according to applicable laws.

我们也可能从第三方收集您的个人信息，如您的雇主、您的服务/产品提供商。此类第三方将依法通知您、征得您的同意或履行其他法律义务。

## 2. **Disclosure of Your Personal Information 个人信息的披露**

Personal information provided by you to Ethypharm will generally be kept confidential but you hereby consent and authorize Ethypharm to provide or disclose such personal information to the necessary extent to the entities below:

您提供给爱的发的个人信息，爱的发将严格保密，但您同意并授权爱的发在必要的范围内向以下主体提供或披露您提供的个人信息：

- any person to whom Ethypharm is compelled or required to do so under law or in response to a competent or government agency;

基于法律规定，或依主管或政府机关的强制要求或指示，而应当向其揭露的对象；



- Ethypharm's agents or service providers;  
爱的发的代理或服务提供商;
- other members of the Ethypharm Group  
其他爱的发集团成员;
- government agencies and industry regulators;  
政府部门和行业监管机构;
- Ethypharm's auditors, accountants, lawyers or other financial or professional advisers;  
爱的发的审计员、会计师、律师或其他财务及专业技术人员;
- other persons as you may instruct or require.  
您可能指示或要求的其他人员。

### 3. **Cross-border Transfer of Your Personal Information** 个人信息的跨境传输

The overseas data recipient is our French headquarter, Ethypharm SAS (contact information: <https://www.ethypharm.com/contact/>), whose physical address is 194 Bureaux de la Colline, Bâtiment D – 12ème étage, 92213 Saint-Cloud Cedex, France. And its phone number is +33 (0)1 41 12 17 20. Currently, our cross-border data transfer scenarios include:

境外数据接收方为我们的法国总部爱的发集团 Ethypharm SAS (联系方式参见: <https://www.ethypharm.com/contact/>), 地址为: 法国圣克鲁市, 194 号, 高林纳办公室, D 栋 12 层, 邮政编码 92213。联系电话: +33 (0)1 41 12 17 20。目前, 我们的跨境传输场景包括:

- If you provide feedback on adverse drug event related with our global products to us, for the purpose of Group unified management and integrating global resources for drug safety risk assessment, we may transfer your occupation, the name of the reporting organization (e.g. when a hospital is the reporting organization), and the personal information of the patient, including designated code number, gender, age, ethnicity, weight, disease, past adverse drug reactions/events, family adverse drug reactions/events, current adverse reaction/event (including symptoms, vital signs, clinical tests).  
  
如您向我们反馈因服用我们全球性的药品而发生的不良反应事件, 出于集团统一管理以及整合全球资源进行药物安全风险评估的目的, 我们可能跨境传输您作为报告人的职业、报告单位名称 (例如医院作为报告人), 以及被报告人 (即患者) 的编号代码、性别、年龄、民族、体重、原患疾病、既往药品不良反应/事件、家族药品不良反应/事件、当前不良反应/事件 (包括症状、体征、临床检验)。
- If you are a healthcare professional/expert related to our project, for purposes of communication with overseas Group (For example, if you attend a meeting organized/requested by our overseas Group with us), we may transfer your name, workplace, department, job position, gender, and email address.

如您是跟我们项目相关的医疗卫生专业人士/专家，出于与境外总部沟通（例如您与我们一同参加境外总部的会议）的目的，我们可能跨境传输您的姓名、工作单位、所在部门/科室、职位、性别、邮箱地址。

- If you are our supplier or partner's contact person, for the purpose of daily reporting to the Group, we may transfer your name, gender, email address, fax number (if any), workplace, and job position.

如您是我们的供应商或合作伙伴的联系人，出于向法国总部进行日常汇报的目的，我们可能跨境传输您的姓名、性别、邮箱地址、传真号码（如有）、工作单位、职位。

According to the requirements of applicable laws and regulations, as well as the contractual agreements between us and overseas recipients (if applicable), you may become a third-party beneficiary under the contract of cross-border transfer of personal information between us and overseas recipients, and enjoy the rights as a third-party beneficiary.

根据适用法律法规的要求以及我们与境外接收方之间的合同约定（如适用），您可能成为我们与境外接收方之间的个人信息跨境传输合同下的第三方受益人，并享有第三方受益人的权利。

Before we provide your personal information outside the territory of China (for the purposes of this Statement only, excluding Hong Kong SAR, Macao SAR, and Taiwan), we will meet the applicable requirements of laws and regulations of the P.R.C. on cross-border transfer of personal information and will require overseas recipients to protect your personal information at the levels not lower than those required by applicable laws and regulations of the P.R.C. Before exercising your personal information rights to overseas recipients, it is recommended to contact us first through the contact information in section 6 below.

我们在向中国（仅为本声明之目的，不包括香港特别行政区、澳门特别行政区和台湾地区）境外提供您的个人信息前，会满足中国法律法规关于个人信息跨境传输的相关要求，并会要求境外的接收方按照不低于中国法律法规规定的保护水平保护您的个人信息。在向境外接收方行使您的个人信息权利时，建议先通过下文第 6 部分的联系方式来联系我们。

#### **4. Protection of Your Personal Information 个人信息的保护**

We will implement the appropriate administrative and security safeguards and procedures in accordance with the applicable laws and regulations to ensure personal information security, to prevent the unauthorized or unlawful processing of personal information and the accidental loss or destruction of, or damage to, personal information.

我们将依据相关法律法规执行适当的行政管理及安全防护措施与程序以保障个人信息安全，以防止个人信息被未经授权或不法处理，以及避免个人信息遭受意外损失、毁坏或损害。

#### **5. Retention Period of Your Personal Information 个人信息的保存期限**

We may retain your personal information for the necessary period required to achieve the purposes stated herein in accordance with the laws and regulations, unless the retention period may be extended in accordance with laws or your requirements. The retention period may vary based on the purpose of processing and the nature of services. We will delete or anonymize the personal information if the retention period expires. If deletion is technically difficult to achieve, we will stop processing activities other than storage and necessary safety protection measures.

我们将会在达成本声明所述目的所需的必要期限内依法保留您的个人信息，除非按照法律要求或您的要求需要延长保留期。保留期可能基于处理的目的以及相关服务而不同。保留期届满后，我们将删除或匿名化处理个人信息。如果删除从技术上难以实现的，我们会停止除存储和采取必要的安全保护措施之外的处理活动。

## 6. **Methods and Procedures for Exercising Your Personal Information Rights 个人信息权利行使的方式与程序**

You as data subject are entitled to exercise the rights in accordance with the law, including:

您有权依法行使个人信息主体的权利，包括：

- check whether Ethypharm holds or uses your personal information and request access to or copy of such data;

查询爱的发是否保管或利用您提供的个人信息，以及要求查阅或复制该数据；

- request Ethypharm to correct or supplement any of your personal information that is inaccurate, incomplete or out-of-date;

要求更正、补充个人信息（如果您提供的个人信息不正确、不完全或已过时）；

- request Ethypharm to specify or explain its policies and procedures in relation to keeping personal information;

要求爱的发说明或解释爱的发保管个人信息政策与程序；

- communicate to Ethypharm your decision, restriction or objection to the processing of your personal information;

决定、限制或拒绝爱的发对您个人信息的处理；

- request Ethypharm to delete your personal information; However, if deleting such your personal information is technically difficult to achieve, Ethypharm will stop processing in addition to storing such your personal information by taking necessary security measures;

要求爱的发删除个人信息，但如删除该个人信息从技术上难以实现的，爱的发将停止除存储和采取必要的安全保护措施之外的处理；

- request Ethypharm to transmit your personal information to a designated personal information processor; and

要求爱的发将个人信息转移至您指定的个人信息处理者；及

- withdraw, in full or in part, your consent given previously.

撤回已给予的同意（全部或部分）。

In each case, you are subject to any applicable legal restrictions, contractual conditions, reasonable internal policies/procedures, a reasonable time period (in accordance with applicable laws). In the case

of a request raised by you as mentioned above, a reasonable fee may be charged (where permitted under applicable laws and as Ethypharm may notify you in writing upon receipt of your request).

前述各项权利的行使应受相关法律、合同约定、合理内部政策/程序及合理期间（依照所适用的法律）之限制。如果您作出上述请求，爱的发可能会收取合理费用（在所适用法律允许的情况下，爱的发可能会在收到您的查询请求后以书面形式通知您）。

If you provide personal information to us because your employer has a business relationship with us (e.g. you are the contact person of our vendor/client/partner), we advise you to contact your company or organization/your employer first before exercising the rights above, and ask the relevant personnel of your company or organization/your employer to contact us.

如您是因为您所在企业与我们发生业务关系而向我们提供个人信息的（例如您是我们供应商/客户/合作伙伴的联系人），那么您在行使上述权利时，建议先联系您所在的企业或组织/您的雇主，请您所在企业或组织/您的雇主的相关人员与我们联系。

If you want to access personal information, correct or delete personal information, etc., please contact: [pipofficer.china@ethypharm.com.cn](mailto:pipofficer.china@ethypharm.com.cn). The contact address of the Company is Room 1804-1806, Ciro's Plaza, No. 388 Nanjing West Road, Huangpu District, Shanghai. If there is any change in contact address, please see <https://www.ethypharm.com.cn/contact/>. In general, we will review the issue as soon as possible and respond within 15 working days after verifying your identity.

如您要求查阅个人信息或更正及/或删除个人信息等时，请联系：[pipofficer.china@ethypharm.com.cn](mailto:pipofficer.china@ethypharm.com.cn)。公司联系地址为：上海市黄浦区南京西路388号仙乐斯广场1804-1806室，联系地址如有变更请以<https://www.ethypharm.com.cn/contact/>所示为准。一般情况下，我们将尽快审核所涉问题，并在核实您的身份后在15个工作日内予以回复。

## 7. **Changes to this Statement 本声明的变更**

We may update this Personal Information Collection Statement from time to time in response to changes in our business practices or legal obligations. You may click the “privacy policy” button at the bottom of <https://www.ethypharm.com.cn/> to read this Statement.

为响应业务实践或法律义务的变化，我们可能不时更新此个人信息收集声明并发布于我们的官网。您可以点击<https://www.ethypharm.com.cn/>底部的“隐私政策”进行阅读。



## Personal Information Protection Statement for Minors

### 未成年人个人信息保护声明

Shanghai Ethypharm Pharmaceuticals Co. Ltd. ("Ethypharm", "the Company" or "us") understand the importance of protecting the personal information of minors. We recognize that the personal information of minors is confidential and sensitive, and we promise to protect their privacy. This Statement outlines our commitment to protecting the personal information of minors in accordance with applicable laws and regulations. **This Statement applies to the processing of personal information for minors under the age of fourteen, whose personal information is sensitive personal information.** If there is any inconsistency between this Statement and the provisions of the Personal Information Protection Management Policy (apply and available to you when you are our employee), General Personal Information Collection Statement, and Personal Information Collection Statement for Employees (apply and available to you when you are our employee), this Statement shall prevail. For matters not covered in this Statement, the provisions of the Personal Information Protection Management Policy, General Personal Information Collection Statement, and Personal Information Collection Statement for Employees shall apply.

上海爱的发制药有限公司（简称“爱的发”、“公司”或“我们”）深知保护未成年人个人信息的重要性。我们认识到未成年人的个人信息是机密和敏感的，我们承诺保护其隐私。本声明阐明了我们根据适用法律法规保护未成年人个人信息的承诺。**本声明适用于不满十四周岁的未成年人的个人信息处理。不满十四周岁的未成年人的个人信息均为敏感个人信息。**如本声明与《个人信息保护管理政策》（将在您成为我们的员工后向您提供并适用于您）、《个人信息收集声明》、《员工个人信息收集声明》（将在您成为我们的员工后向您提供并适用于您）的条款规定存在不一致的，以本声明为准。本声明未涉及之处，则将参照适用《个人信息保护管理政策》、《个人信息收集声明》、《员工个人信息收集声明》之规定。

### **Instructions for Guardians 未成年人监护人特别说明**

Before providing us with your minor's personal information directly or via any third parties, please make sure you have acknowledged and consented to our collection, storage, use, transfer and disclosure of your minor's personal information in accordance with the Personal Information Protection Management Policy, General Personal Information Collection Statement, Personal Information Collection Statement for Employees, this Statement and applicable laws. We only collect the minor's personal information for the purpose of providing you and the minor with products/services or processing other matters required by you or laws and regulations, and to the extent necessary. If you do not agree with the content of this Statement, we cannot provide products or services properly. If you find that the minor has provided us any personal information without your consent, please notify us to delete via the contact information under Article 6 of this Statement.

在您将未成年人个人信息直接或通过第三方提供给我们前，请确保您认可并同意我们根据《个人信息保护管理政策》、《个人信息收集声明》、《员工个人信息收集声明》、本声明和适用法律收集、存储、使用、转移以及披露未成年人个人信息。我们仅会出于向您和未成年人提供产品或服务或处理您或法律法规要求的其他事项的目的并在必要范围内，收集未成年人个人信息。如果您不同意本声明的内容，将可能导致我们的无法正常提供产品/服务。如果您发现未成年人未经您同意向我们提供了个人信息，请通过本声明第6条联系信息中的联系方式通知我们进行删除。

### **Instructions for Minors: 未成年人特别说明**

Please inform your parent or Guardian to read this Statement and obtain his/her consent before providing any personal information to us. DO NOT provide any personal information to us until you have obtained your Guardian's consent.

请在向我们提供个人信息前告知您的父母或监护人阅读本声明并征求他/她的同意。在未经您的监护人同意之前，请不要向我们提供任何个人信息。

### **1. Collection and Use of Personal Information of Minors 未成年人个人信息的收集和使用**

When minors contact us through the "Contact Us" section of our official website or other channel, the personal information we may collect from minors includes names, email addresses, phone numbers, purpose and message. When you, as our employee, accept our benefits (e.g. commercial insurance, travel booking) for employees' children, we may collect personal information about your minor children, including name, ID card number. When minors are reported as individuals with adverse reactions to our drugs, we will collect information on adverse drug reactions of minors in accordance with the law, including name, gender, ethnicity, age, disease, adverse reaction situation, and other necessary information required by the authorities. We will only use the personal information of minors for the purpose stated when collecting information, such as answering inquiries, offer benefit for employee's minor children, reporting adverse reactions in accordance with the law, or other purposes required or permitted by laws and regulations.

当未成年人主动通过官网“联系我们”栏目或其他渠道联系我们时，我们可能收集的未成年人个人信息包括姓名、电子邮件地址、电话号码、联系目的与留言信息。当您作为我们的员工接受我们为员工子女提供的商业保险、旅游预订等福利时，我们可能收集提供福利所必需的信息，包括您未成年人子女的姓名、身份证号码。当未成年人作为我们药物不良反应的被申请人时，我们将依法收集未成年人的药物不良反应信息，包括姓名、性别、民族、年龄、疾病、不良反应情况以及监管机关要求我们收集的信息。我们只会在收集时明示的目的下使用未成年人个人信息，如回答询问、为员工子女提供福利、依法进行不良反应报告、或法律法规要求或允许的其他目的。

### **2. Protection of Personal Information of Minors 未成年人个人信息的保护**

We take reasonable measures to protect personal information of minors against loss or theft, as well as unauthorized access, disclosure, copying or modification. Personal information of minors is stored on secure servers in a controlled and monitored environment. We also require our staff and service providers to maintain the confidentiality and security of personal information of minors.

我们采取合理的措施来保护未成年人个人信息免受损失、盗窃或者未经授权的访问、披露、复制或修改。未成年人个人信息将在受控和监控的环境中存储在安全服务器上。我们还要求我们的员工和服务提供商保持未成年人个人信息的机密性和安全性。

### **3. Disclosure and Cross-border Transfer of Personal Information of Minors 未成年人个人信息的披露与跨境传输**

Unless required by law or with the explicit consent of the guardian, we will not disclose personal information of minors to any third party. For the purpose of collecting information, such as processing welfare treatments, reporting adverse reactions, we may need to disclose personal information of minors to service providers or partners/regulatory authorities. We require our service providers or partners to maintain the confidentiality and security of personal information of minors and disclose it only for the purpose of collecting personal information.

除非法律要求或得到监护人的明确同意，我们不会披露未成年人个人信息给任何第三方。为了执行收集信息的目的，如处理福利待遇、不良反应报告，我们可能需要将未成年人个人信息披露给服务提供商/合作伙伴/监管部门。我们要求我们的服务提供商或合作伙伴保持未成年人个人信息的机密性和安全性，并仅出于收集个人信息的目的披露。

In principle, we will store personal information within China. If we transmit relevant personal information collected domestically to overseas institutions, we will fulfill relevant legal obligations and provide protection for the personal information of minors.

原则上，我们将把个人信息存储在中国境内。如我们需要向境外机构传输境内收集的相关个人信息的，我们会履行相应的法律义务并为未成年人个人信息提供保护。

#### **4. Methods and Procedures for Exercising Personal Information Rights 个人信息权利行使的方式与程序**

Minor users and guardians can exercise their rights in accordance with the laws, e.g. access, correct and delete the personal information of minors held by us by contacting us to raise such request. We will respond in accordance with the provisions of Article 6 of this Statement.

未成年人用户和监护人有权依法行使个人信息主体权利，包括访问、更正和删除我们持有的未成年人个人信息等等。未成年人用户和监护人可以通过联系我们来提出访问、更正和删除等请求。我们会将按照本声明第 6 条中的规定予以回复。

However, please note that if a minor user or guardian requests us to delete or revoke authorization for certain specific personal information of minor, it may result in the minor user being unable to continue using our products and services or certain specific business functions in the products and services. The decision to revoke authorization will not affect the information processing previously conducted based on the authorization of the guardian and minor. If the guardians find that the minors have provided us with their personal information without their consent, please contact us promptly and we will delete the relevant data as soon as possible.

但请注意，若未成年人用户或监护人要求我们删除或撤回授权某些特定未成年人个人信息，可能导致该未成年人用户无法继续使用我们的产品和服务或产品和服务中的某些具体业务功能。撤回授权的决定不会影响此前基于监护人和未成年人的授权而开展的信息处理。如监护人发现未成年人在未经监护人同意的情况下向我们提供了未成年人个人信息，请及时联系我们，我们会及时尽快删除相关数据。

#### **5. Retention Period of Personal Information of Minors 未成年人个人信息的保存期限**

We retain personal information of minors for only as long as necessary to fulfill the purposes for which it was collected or as required by law. Personal information of minors will be securely deleted or destroyed when it is no longer needed or its legal retention period is expired. If deletion is technically difficult to achieve, we will stop processing activities other than storage and necessary safety protection measures.

我们仅在实现收集个人信息时的相应目的所必需的时限或法律规定的时间限制内保留未成年人个人信息。当未成年人个人信息不再需要或法律规定的保留期届满时，我们会安全地删除或销毁它。如果删除从技术上难以实现的，我们会停止除存储和采取必要的安全保护措施之外的处理活动。



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## **6. Contact Information 联系信息**

If you have any questions or concerns about this Statement, or if you would like to access, correct or delete any personal information of minors, etc, please contact our personal information protection specialist at [pipofficer.china@ethypharm.com.cn](mailto:pipofficer.china@ethypharm.com.cn). The contact address of the Company is Room 1804-1806, Ciro's Plaza, No. 388 Nanjing West Road, Huangpu District, Shanghai. If there is any change in contact address, please see <https://www.ethypharm.com.cn/contact/>. In general, we will review the issue as soon as possible and respond within 15 working days after verifying your identity (including the guardianship relationship between the guardian and the minor).

如果您对本声明有任何疑问或担忧，或者您想要访问、更正或删除有关未成年人个人信息等时，请联系我们的个人信息保护专员（[pipofficer.china@ethypharm.com.cn](mailto:pipofficer.china@ethypharm.com.cn)）。公司的联系地址为：上海市黄浦区南京西路 388 号仙乐斯广场 1804-1806 室，联系地址如有变更请以 <https://www.ethypharm.com.cn/contact/> 所示为准。一般情况下，我们将尽快审核所涉问题，并在核实您的身份（包含监护人与未成年人之间的监护关系）后在 15 个工作日内予以回复。