1. Who is responsible for data processing and who can I contact?
谁负责数据处理，我可以联系谁?

1.1. The respective Quality Austria international licensing partner (hereinafter referred to as the "**Licensing Partner**", "**we**", "**us**") is an independent certification, assessment or training organization authorized to apply the Quality Austria system, methods and trademarks on the basis of a license agreement with Quality Austria Holding GmbH. The Licensing Partner provides services such as training, certification, assessments and validations on the basis of internationally recognized accreditations and approvals.
相应的 Quality Austria 国际许可合作伙伴（以下简称"**许可合作伙伴**"或"**我们**"）是一家独立的认证、评估或培训机构，根据其与 Quality Austria Holding GmbH 签订的许可协议，获准使用 Quality Austria 的体系、方法和商标。许可合作伙伴基于国际公认的认可资格及批准，提供培训、认证、评估和审定等服务。

1.2 The Licensing Partner is the controller within the meaning of Article 4(7) of the General Data Protection Regulation ("**GDPR**").
许可合作伙伴是《通用数据保护条例》（"**GDPR**"）第 4 条第 7 项所指的数据控制者。

1.3 The Licensing Partner acts as controller within the meaning of Article 4(7) GDPR for processing activities for which it independently determines the purposes and means, in particular in relation to its own customer relationship, enquiries, offers, contract administration, billing, marketing activities, network partner management and legal claims. Quality Austria and other entities of the Quality Austria group may process personal data in connection with services provided under the Quality Austria system under their own responsibility, in particular for order management, certification, accreditation-related documentation, quality assurance, certificate management and the issuance of certificates. In such cases, Quality Austria and the Licensing Partner act as separate and independent controllers and do not jointly determine the purposes and means of the relevant processing. Where the Licensing Partner processes personal data exclusively on documented instructions of Quality Austria in the context of services provided under the Quality Austria system, it acts as processor within the meaning of Article 4(8) GDPR. Such processing is governed by a separate data processing agreement pursuant to Article 28 GDPR.
对于由许可合作伙伴独立决定处理目的和方式的数据处理活动，许可合作伙伴作为 GDPR 第 4 条第 7 项所指的数据控制者，尤其涉及其自身的客户关系、咨询、报价、合同管理、开票、营销活动、网络合作伙伴管理及法律请求。Quality Austria 及 Quality Austria 集团的其他实体可就 Quality Austria 体系下所提供服务涉及的个人数据，在其自身责任范围内进行处理，尤其用于订单管理、认证、认可相关文件记录、质量保证、证书管理及证书签发。在这些情况下，Quality Austria 与许可合作伙伴分别作为独立的数据控制者，不共同决定相关处理的目的和方式。若许可合作伙伴在提供 Quality Austria 体系下的服务时，仅根据 Quality Austria 的书面指示处理个人数据，则其作为 GDPR 第 4 条第 8 项所指的数据处理者。此类处理受依据 GDPR 第 28 条另行签订的数据处理协议约束。

1.4 You can reach us as follows:
您可以通过以下方式联系我们：

Shanghai OQS International (China) CO., LTD
6th Floor, No. 1921 Huqingping Highway, Qingpu District, Shanghai 201702, China
Phone: +86-21-33869888
E-Mail: office@oqs-ap.com
Shanghai OQS International (China) CO., LTD
地址：中国上海市青浦区沪青平公路 1921 号 6 楼，邮编 201702
电话：+86-21-33869888
电子邮箱：office@oqs-ap.com

1.5 takes the protection of your personal data very seriously. The controller therefore treats your personal data confidentially and in accordance with the applicable data protection regulations, in particular the GDPR and any applicable national data protection laws.
高度重视您的个人数据保护。因此，数据控制者会对您的个人数据保密，并按照适用的数据保护法规进行处理，尤其是 GDPR 及任何适用的国家数据保护法律。

1.6 In this privacy policy you will find information on the data processing carried out. The terms laid down in the GDPR are used. For better comprehensibility, you will find below the most important terms according to their legal definition:
本隐私政策向您介绍所开展的数据处理活动。本政策采用 GDPR 中规定的术语。为便于理解，下文列出最重要术语的法律定义：

- **Personal data:** Any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
个人数据：与已识别或可识别的自然人（"**数据主体**"）有关的任何信息；可识别的自然人是指能够被直接或间接识别的自然人，尤其是通过姓名、身份识别号码、位置数据、在线标识符等标识，或通过该自然人在身体、生理、遗传、精神、经济、文化或社会身份方面的一个或多个特定因素而识别。

- **Processing:** Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
处理：无论是否采用自动化方式，对个人数据或个人数据集实施的任何操作或一系列操作，例如收集、记录、组织、结构化、存储、调整或变更、检索、查阅、使用、通过传输予以披露、传播或以其他方式提供、匹配或组合、限制、删除或销毁。

- **Data subject:** The person whose personal data is processed.
数据主体：其个人数据受到处理的个人。

- **Controller:** The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
数据控制者：单独或与他人共同决定个人数据处理目的和方式的自然人、法人、公共机关、机构或其他组织。

- **Processor:** The natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
数据处理者：代表数据控制者处理个人数据的自然人、法人、公共机关、机构或其他组织。

- **Consent (of the data subject):** Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
（数据主体的）同意：数据主体自由作出的、具体的、知情的且明确无歧义的意愿表示，其通过声明或明确的肯定行为，表示同意处理与其有关的个人数据。

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2. For what purposes and on what legal basis is your personal data processed?
基于哪些目的和法律依据处理您的个人数据?

The Licensing Partner is the controller for the data processing operations described below pursuant to Article 4(7) GDPR.
根据 GDPR 第 4 条第 7 项，许可合作伙伴是下述数据处理活动的数据控制者。

2.1 Operation of the website
网站运营

2.1.1 In order to make the website available to you and to be able to recognize, prevent and investigate attacks on our website, the Licensing Partner processes the following personal data on the basis of legitimate interests (Art 6 para 1 lit f GDPR): the URL called up; the date and time of the call; the IP address of the computer or mobile device; the name and version of the web browser; the browser type and settings data (screen resolution, color depth, time zone settings, browser extensions, fonts, language); the operating system; and the website (URL) from which you visit the website ("referrer").
为向您提供网站服务，并能够识别、防范及调查针对我们网站的攻击，许可合作伙伴基于合法利益（GDPR 第 6 条第 1 款(f)项），处理以下个人数据：所访问的 URL；访问日期和时间；计算机或移动设备的 IP 地址；网络浏览器的名称和版本；浏览器类型和设置数据（屏幕分辨率、色深、时区设置、浏览器扩展程序、字体、语言）；操作系统；以及您访问本网站之前所在网站的 URL（"来源网站"）。

2.2 Enquiry by website, email, post or telephone
通过网站、电子邮件、邮寄或电话提出咨询

2.2.1 If you send an enquiry on the website, by e-mail or by telephone to the Licensing Partner, the Licensing Partner processes the following personal data to answer the enquiry in order to fulfil pre-contractual measures or to fulfil the contract (Art 6 para 1 lit b GDPR) or on the basis of legitimate interests in being able to process your enquiry (Art 6 para 1 lit f GDPR): Name; e-mail address; address; telephone number; content of the enquiry; other information you provide to the Licensing Partner;
如果您通过网站、电子邮件或电话向许可合作伙伴提出咨询，许可合作伙伴将为答复咨询而处理以下个人数据，其依据是履行订立合同前的措施或履行合同（GDPR 第 6 条第 1 款(b)项），或能够处理您咨询的合法利益（GDPR 第 6 条第 1 款(f)项）：姓名；电子邮箱地址；地址；电话号码；咨询内容；以及您向许可合作伙伴提供的其他信息。

2.3 Offering services and products (incl. customer processing)
提供服务和产品（包括客户业务处理）

2.3.1 Within the scope of its own customer relationship and customer processing in connection with services provided under the Quality Austria system, the Licensing Partner processes: (i) personal data that you provide to the Licensing Partner, (ii) personal data that customers provide to the Licensing Partner as clients of services provided under the Quality Austria system and (iii) personal data that we collect ourselves in the course of providing services provided under the Quality Austria system. For the aforementioned purposes, we process name, address and other contact data, date and place of birth, legitimization data (including ID data, certificates, electronic signature) and other personal data in connection with the respective order (including audit documentation, event documentation, certificate data, billing data, bank

data). Without the processing of the aforementioned data, we cannot offer services provided under the Quality Austria system and cannot carry out ongoing customer processing. The legal basis for this processing is the implementation of pre-contractual measures or the fulfilment of the contract (Art 6 para 1 lit b GDPR) and, where relevant, the fulfilment of legal obligations (Art 6 para 1 lit c GDPR).Audit reports and audit documentation are generally stored for 12 years, unless there are longer normative or statutory retention obligations. Where necessary for the provision, documentation, review or certification of services provided under the Quality Austria system, the Licensing Partner may transmit personal data and audit or certification-related documentation to Quality Austria or other entities of the Quality Austria group. Quality Austria processes such data under its own responsibility where it determines the purposes and means of the relevant processing, in particular for certification, accreditation-related documentation, quality assurance, certificate management and the issuance of certificates. In such cases, the Licensing Partner and Quality Austria act as separate controllers. Where the Licensing Partner processes such data solely on documented instructions of Quality Austria, the Licensing Partner acts as processor under Article 28 GDPR.

在其自身客户关系范围内，以及处理与 Quality Austria 体系下所提供服务相关的客户业务时，许可合作伙伴会处理：(i) 您向许可合作伙伴提供的个人数据；(ii) 客户作为 Quality Austria 体系下服务的委托方而向许可合作伙伴提供的个人数据；以及 (iii) 我们在提供 Quality Austria 体系下的服务过程中自行收集的个人数据。为实现上述目的，我们会处理姓名、地址及其他联系方式、出生日期和出生地点、身份核验资料（包括身份证件资料、证明文件、电子签名），以及与相应订单有关的其他个人数据（包括审核文件、活动文件、证书数据、开票数据和银行资料）。如果不处理上述数据，我们将无法提供 Quality Austria 体系下的服务，也无法持续处理客户业务。此类处理的法律依据是履行订立合同前的措施或履行合同（GDPR 第 6 条第 1 款(b)项），以及在相关情况下履行法定义务（GDPR 第 6 条第 1 款(c)项）。审核报告及审核文件一般保存 12 年，除非规范性要求或法律规定了更长的保存期限。为提供、记录、评审或认证 Quality Austria 体系下的服务，如有必要，许可合作伙伴可将个人数据及审核或认证相关文件传输给 Quality Austria 或 Quality Austria 集团的其他实体。如果 Quality Austria 决定相关处理的目的和方式，则其在自身责任范围内处理此类数据，尤其用于认证、认可相关文件记录、质量保证、证书管理及证书签发。在这些情况下，许可合作伙伴与 Quality Austria 分别作为独立的数据控制者。若许可合作伙伴仅根据 Quality Austria 的书面指示处理此类数据，则许可合作伙伴作为 GDPR 第 28 条规定的数据处理者。

2.4 Advertising communication, newsletter, event participation
广告宣传、电子通讯及活动参与

2.4.1 We send our customers electronic mail (by email, SMS, MMS or Messenger) to advertise our products or services ("**promotional messages**"). For this purpose, we process your name, contact details and other information that you provide to us in connection with the receipt of promotional messages. The customer can object to the sending of promotional messages at any time by sending an email to the contact address specified in point 1.4. We will also give you the opportunity to opt out of receiving further promotional messages with each promotional message. The legal basis for sending advertising messages is the applicable telecommunications and data protection laws.

我们向客户发送电子消息（通过电子邮件、短信、彩信或即时通讯工具），以宣传我们的产品或服务（"**推广消息**"）。为此，我们会处理您的姓名、联系方式，以及您在接收推广消息时向我们提供的其他信息。客户可随时向第 1.4 条所列联系邮箱发送电子邮件，反对接收推广消息。我们也会在每条推广消息中为您提供退订后续推广消息的机会。发送广告消息的法律依据是适用的电信及数据保护法律。

2.4.2 We send you postal letters with advertising communication on the basis of our legitimate interests in advertising products or services of interest to you (Art. 6 para. 1 lit. f GDPR). For this purpose, we process your name, contact details and other information that you provide to

us in connection with the receipt of advertising messages. You can exercise your right to object to postal advertising communication by sending an email to the email address listed in point 1.4.
我们基于向您宣传您可能感兴趣的产品或服务的合法利益（GDPR 第 6 条第 1 款(f)项），向您邮寄广告宣传信函。为此，我们会处理您的姓名、联系方式，以及您在接收广告消息时向我们提供的其他信息。您可向第 1.4 条所列电子邮箱地址发送邮件，行使反对接收邮寄广告宣传的权利。

2.4.3 If you, as a non-customer, voluntarily provide us with your contact details and other data provided by you for the purpose of sending newsletters, participating in events or other information transmissions, we will process your data on the basis of your consent (Art 6 para 1 lit a GDPR). You can revoke your consent at any time by sending an e-mail to the e-mail address listed in point 1.4.
如果您并非我们的客户，但为接收电子通讯、参加活动或接收其他信息，自愿向我们提供联系方式及其他数据，我们将基于您的同意（GDPR 第 6 条第 1 款(a)项）处理您的数据。您可随时向第 1.4 条所列电子邮箱地址发送邮件，撤回您的同意。

2.5 Certificate management
证书管理

2.5.1 The Licensing Partner makes it possible to check or query valid certifications that have been issued. For this purpose, personal data can also be processed, specifically name, academic title, certificate name, certificate title and certificate number. (for further details, see point 3.3 below). The legal basis for this is Art. 6 para. 1 lit c GDPR in conjunction with applicable accreditation rules and standards (in particular EN ISO/IEC 17021-1, EN ISO/IEC 17065, EN ISO/IEC 17029, EN ISO/IEC 17024 and relevant regulations of the accreditation bodies) and our legitimate interest pursuant to Art. 6 para. 1 lit f GDPR to carry out all activities related to certificate management.
许可合作伙伴提供对已签发且有效的认证进行核验或查询的功能。为此，也可能处理个人数据，具体包括姓名、学术头衔、证书名称、证书标题及证书编号（更多详情见下文第 3.3 条）。其法律依据是 GDPR 第 6 条第 1 款(c)项，并结合适用的认可规则和标准（尤其是 EN ISO/IEC 17021-1、EN ISO/IEC 17065、EN ISO/IEC 17029、EN ISO/IEC 17024 及认可机构的相关规定），以及我们根据 GDPR 第 6 条第 1 款(f)项开展所有证书管理相关活动的合法利益。

2.5.2 Due to normative requirements (in particular EN ISO/IEC 17021-1 and IAF MD 28), the Licensing Partner is obliged to make certain information about issued certifications available to the public. For this purpose, the following data is published: name/company and address of the certified organization, certificate number, certified locations, scope and applicable normative documents, status of the issued certification, date of issue and period of validity. Publication takes place via the certificate search on the website of the Licensing Partner. In the case of certifications according to IAF MD 28, the aforementioned information is also published in the IAF database. The legal basis for this data processing is Article 6(1)(c) GDPR in conjunction with the relevant standards and - where necessary - our legitimate interest pursuant to Article 6(1)(f) GDPR in ensuring the transparency and verifiability of the certifications issued.
根据规范性要求（尤其是 EN ISO/IEC 17021-1 及 IAF MD 28），许可合作伙伴有义务向公众提供已颁发认证的某些信息。为此，会公布以下数据：获证组织的名称 / 公司名称及地址、证书编号、获证场所、认证范围和适用的规范性文件、已颁发认证的状态、签发日期及有效期。上述信息通过许可合作伙伴网站的证书查询功能公布。对于依据 IAF MD 28 的认证，上述信息还会公布于 IAF 数据库。此类数据处理的法律依据是 GDPR 第 6 条第 1 款(c)项，并结合相关标准；必要时，还包括我们根据 GDPR 第 6 条第 1 款(f)项确保所颁发认证的透明性和可核验性的合法利益。

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2.6 Legal prosecution
法律维权

2.6.1 If an administrative or judicial dispute arises, the data necessary for the appropriate legal prosecution will be processed and, if necessary, transmitted to legal representatives, courts and administrative authorities. In this context, your contact details (first and last name, academic title, address) and other data in connection with the legal dispute in question will be processed. The aforementioned personal data is processed on the basis of our legitimate legal interests in legal prosecution pursuant to Art. 6 para. 1 lit f GDPR and pursuant to Art. 9 para. 2 lit f GDPR.
如果发生行政或司法争议，将处理为适当依法维权所必需的数据，并在必要时将其传输给法律代理人、法院及行政机关。在此过程中，将处理您的联系方式（名字和姓氏、学术头衔、地址），以及与相关法律争议有关的其他数据。上述个人数据的处理基于我们依法维权的合法利益，其依据为 GDPR 第 6 条第 1 款(f)项及第 9 条第 2 款(f)项。

2.7 Data processing in the context of network partners
与网络合作伙伴有关的数据处理

2.7.1 We process personal data of auditors, assessors, inspectors, technical experts, validators, verifiers and observers (hereinafter referred to as "**network partners**") who work within the framework of services provided under the Quality Austria system by the Licensing Partner (in particular audits, inspections, assessments and comparable activities).
我们会处理由许可合作伙伴提供的 Quality Austria 体系下服务（尤其是审核、检查、评估及类似活动）中所使用的审核员、评估员、检查员、技术专家、审定员、核查员及观察员（以下统称"**网络合作伙伴**"）的个人数据。

2.7.2 Due to normative requirements for certification bodies (in particular ISO/IEC 17021-1, ISO/IEC 17065, ISO/IEC 17029, ISO/IEC 17024), we are obliged to keep records of the qualifications, training, experience, professional affiliation, professional status, competence and known conflicts of interest of the network partners and to monitor their competence on an ongoing basis. We process the following personal data for this purpose: Proof of qualifications and training, information on professional experience, information on professional status, documentation on training, information on conflicts of interest, competence assessments and other information collected in the course of the collaboration.
根据适用于认证机构的规范性要求（尤其是 ISO/IEC 17021-1、ISO/IEC 17065、ISO/IEC 17029、ISO/IEC 17024），我们有义务记录网络合作伙伴的资格、培训、经验、专业隶属关系、职业状态、能力及已知利益冲突，并持续监控其能力。为此，我们会处理以下个人数据：资格及培训证明、专业工作经历信息、职业状态信息、培训记录、利益冲突信息、能力评价，以及合作过程中收集的其他信息。

2.7.3 The processing of this data is necessary for the appointment as a network partner and for the implementation of services provided under the Quality Austria system. The legal basis for this processing is the fulfilment of the contract or the implementation of pre-contractual measures (Art 6 para 1 lit b GDPR).
处理这些数据，是委任网络合作伙伴及实施 Quality Austria 体系下服务所必需的。此类处理的法律依据是履行合同或履行订立合同前的措施（GDPR 第 6 条第 1 款(b)项）。

2.7.4 To the extent necessary for submitting offers and obtaining orders, CVs of network partners, including information on qualifications and competences, may be transmitted to potential client organizations. This may also include transfer to countries outside the EU/EEA, including third countries without an adequate level of data protection. The legal basis for this processing is the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR, as the Licensing Partner and the

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potential client organizations have a legitimate interest in proving the qualifications of the auditors used. Further details on third-country transfers can be found under point 3.4.
在提交报价及取得订单所必需的范围内，可向潜在客户组织传输网络合作伙伴的简历，包括其资格及能力信息。这也可能包括向欧盟 / 欧洲经济区（EU/EEA）以外的国家传输数据，其中包括不具备充分数据保护水平的第三国。此类处理的法律依据为 GDPR 第 6 条第 1 款(f)项所规定的合法利益，因为许可合作伙伴及潜在客户组织在证明所使用审核员的资格方面均具有合法利益。关于向第三国传输数据的更多详情，见第 3.4 条。

2.7.5 For the purpose of audit planning, information on the competences of network partners may also be made available to other network partners and lead auditors. The legal basis is the legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR, as the Licensing Partner has a legitimate interest in efficient and standard-compliant audit planning.
为开展审核策划，也可向其他网络合作伙伴及审核组长提供网络合作伙伴的能力信息。其法律依据为 GDPR 第 6 条第 1 款(f)项所规定的合法利益，因为许可合作伙伴在高效且符合标准要求的审核策划方面具有合法利益。

2.7.6 If a network partner accepts an order for the provision of services provided under the Quality Austria system, we process personal data about the network partner for the purpose of contract fulfilment, in particular for the preparation of audit and examination documentation. For this purpose, the data may also be transmitted to the commissioning organization and to the respective competent accreditation or licensing body. The legal basis is the fulfilment of the contract (Art 6 para 1 lit b GDPR). You can find more information on the recipients of this data under point 3.
如果网络合作伙伴接受提供 Quality Austria 体系下服务的订单，我们会为履行合同而处理该网络合作伙伴的个人数据，尤其用于编制审核和考核文件。为此，也可将数据传输给委托组织及相应的主管认可或许可机构。其法律依据是履行合同（GDPR 第 6 条第 1 款(b)项）。关于这些数据接收方的更多信息，见第 3 条。

3. To which recipients will your personal data be transmitted?
您的个人数据将传输给哪些接收方?

3.1 We transmit your personal data to our cooperation partners of the relevant services provided under the Quality Austria system to the extent necessary to process your enquiry or to provide the desired services provided under the Quality Austria system. When booking co-operation products that are identified as such, the personal data will be passed on to the respective partners. For the purposes of services provided under the Quality Austria system, personal data may also be transmitted to Quality Austria or other entities of the Quality Austria group where this is necessary for order management, certification, accreditation-related documentation, quality assurance, certificate management or the issuance of certificates. Quality Austria or the respective entity of the Quality Austria group processes such data as a separate controller, unless the Licensing Partner processes personal data on documented instructions of Quality Austria as processor.
我们会在处理您的咨询或提供您所需的 Quality Austria 体系下服务所必需的范围内，将您的个人数据传输给相关服务的合作伙伴。在预订明确标识为合作产品的产品时，个人数据将提供给相应合作伙伴。为提供 Quality Austria 体系下的服务，如果订单管理、认证、认可相关文件记录、质量保证、证书管理或证书签发确有需要，个人数据也可传输给 Quality Austria 或 Quality Austria 集团的其他实体。Quality Austria 或 Quality Austria 集团的相应实体作为独立的数据控制者处理此类数据，但许可合作伙伴作为数据处理者根据 Quality Austria 的书面指示处理个人数据的情况除外。

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3.2 We use processors who perform services on our behalf. The processors may only process the data provided to them in accordance with our instructions and to the extent necessary to perform services for us. We contractually oblige these processors to guarantee the confidentiality and security of the personal data processed within the scope of the order. For the purpose of providing services under the Quality Austria system, the Licensing Partner may forward personal data to external auditors, trainers, assessors, inspectors, validators, verifiers and technical experts engaged by the Licensing Partner. To the extent these persons process personal data for processing activities for which the Licensing Partner acts as controller, they may act as processors of the Licensing Partner. Where the Licensing Partner itself processes personal data on behalf of Quality Austria and uses a freelance external auditor or other service provider for such processing, that service provider acts as a sub-processor and must be engaged in accordance with Article 28(2) and (4) GDPR and the applicable data processing agreement with Quality Austria. Employees of the Licensing Partner act under the authority of the Licensing Partner and are not separate processors merely by reason of carrying out such activities. In addition, the Licensing Partner uses external IT service providers.
我们使用代表我们提供服务的数据处理者。这些数据处理者仅可根据我们的指示，并在为我们提供服务所必需的范围内，处理向其提供的数据。我们通过合同要求这些数据处理者保证受托处理的个人数据的保密性和安全性。为提供 Quality Austria 体系下的服务，许可合作伙伴可向其聘用的外部审核员、培训师、评估员、检查员、审定员、核查员及技术专家提供个人数据。如果这些人员所处理的个人数据涉及许可合作伙伴作为数据控制者的处理活动，则这些人员可作为许可合作伙伴的数据处理者。若许可合作伙伴本身代表 Quality Austria 处理个人数据，并为此使用自由职业的外部审核员或其他服务提供方，则该服务提供方作为次级数据处理者，必须按照 GDPR 第 28 条第 2 款及第 4 款，以及与 Quality Austria 签订的适用数据处理协议予以聘用。许可合作伙伴的员工在许可合作伙伴的授权下工作，不会仅因开展这些活动而成为独立的数据处理者。此外，许可合作伙伴还使用外部 IT 服务提供方。

3.3 Due to normative requirements, the Licensing Partner is obliged to provide the accreditation and licensing bodies with information on services provided under the Quality Austria system and/or to grant them access to such information upon their request. The accreditation and licensing bodies may also participate in on-site audits. In the course of this, personal data may also be passed on to the accreditation and licensing bodies. In addition, the Licensing Partner may transmit personal data to other recipients (such as authorities) in order to fulfil legal reporting obligations.
根据规范性要求，许可合作伙伴有义务向认可及许可机构提供 Quality Austria 体系下服务的相关信息，和/或应其要求允许其查阅此类信息。认可及许可机构也可参加现场审核。在此过程中，个人数据也可能提供给认可及许可机构。此外，许可合作伙伴还可为履行法定报告义务，向其他接收方（例如主管机关）传输个人数据。

3.4 The level of data protection in other countries outside the EEA may not correspond to that within the EEA. However, we only transfer your personal data to countries for which the European Commission has decided that they have an adequate level of data protection, or we take measures in accordance with Chapter V GDPR to ensure that all recipients in third countries guarantee an adequate level of data protection. For example, we conclude the standard contractual clauses issued by the European Commission with these recipients.
欧洲经济区（EEA）以外其他国家的数据保护水平可能与欧洲经济区内的水平不同。但是，我们仅向欧洲委员会已认定具备充分数据保护水平的国家传输您的个人数据，或者按照 GDPR 第五章采取措施，确保第三国的所有接收方均能保证充分的数据保护水平。例如，我们会与这些接收方签订由欧洲委员会发布的标准合同条款。

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4. How long will your personal data be stored?
您的个人数据将保存多久?

4.1 In principle, your personal data will only be stored for as long as is necessary to fulfil the respective purpose.
原则上，您的个人数据仅保存至实现相应目的所必需的期限。

4.2 Notwithstanding point 4.1, the Licensing Partner will store your data for longer if and insofar as this is necessary to fulfil statutory retention obligations under applicable law or to pursue or defend legal claims (generally for a maximum period of 3 years), whereby in the case of imminent or ongoing proceedings, the data will be processed until the conclusion of the proceedings.
尽管有第 4.1 条的规定，如果且在履行适用法律规定的法定保存义务，或提出法律请求或进行抗辩（一般最长期限为 3 年）所必需的范围内，许可合作伙伴将延长保存您的数据；如存在即将开始或正在进行的程序，数据将处理至该程序结束。

4.3 Application documents, audit and assessment reports as well as other documents related to certification are generally stored for a period of 12 years in accordance with applicable accreditation requirements, unless normative or legal requirements require longer storage. For the pursuit or defense of legal claims, the aforementioned documents are generally processed for a maximum of 3 years, whereby longer processing of the data may be necessary in the event of imminent or specific proceedings.
申请文件、审核及评估报告，以及其他与认证有关的文件，通常按照适用的认可要求保存 12 年，除非规范性要求或法律要求保存更长时间。为提出法律请求或进行抗辩，上述文件一般最多处理 3 年；如存在即将开始或具体的程序，则可能需要更长时间处理相关数据。

4.4 If the data processing is based on your consent, the Licensing Partner will process your data until revoked, unless the purpose of processing has already been achieved. In this case, the data will be deleted once it is no longer necessary to fulfil the purpose. You can withdraw your consent at any time by sending an e-mail to the e-mail address given in point 1.3. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
如果数据处理基于您的同意，许可合作伙伴将处理您的数据直至您撤回同意，除非处理目的已提前实现。在这种情况下，数据将在不再需要用于实现该目的后删除。您可随时向第 1.3 条所列电子邮箱地址发送邮件，撤回您的同意。撤回同意不影响撤回前基于同意进行处理的合法性。

5. What rights do you have?
您享有哪些权利?

5.1 You have the right of access under Art 15 GDPR, the right to rectification under Art 16 GDPR, the right to erasure under Art 17 GDPR, the right to restriction of processing under Art 18 GDPR, the right to object under Art 21 GDPR, the right not to be subject to automated individual decision-making, including profiling, under Art 22 GDPR and the right to data portability under Art 20 GDPR. You also have the right to lodge a complaint with a competent data protection supervisory authority in accordance with Art 77 GDPR. You can find more information about your rights at [www.cac.gov.cn]
您享有 GDPR 第 15 条规定的查阅权、第 16 条规定的更正权、第 17 条规定的删除权、第 18 条规定的限制处理权、第 21 条规定的反对权、第 22 条规定的不受自动化个人决策（包括画像分析）约束的权利，以及第

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20 条规定的数据可携带权。您还有权依据 GDPR 第 77 条向有管辖权的数据保护监督机关提出投诉。有关您所享有权利的更多信息，请参见 [www.cac.gov.cn]。

5.2 The competent supervisory authority is [Cyberspace Administration of China (CAC)]
主管监督机关为 [国家互联网信息办公室（CAC）]。

5.3 If you have any questions in connection with the processing of your personal data or wish to assert any rights under the GDPR, such as your right to cancellation or your right to information, please contact **the Licensing Partner** as described above in point 1.4.
如果您对个人数据处理有任何疑问，或希望行使 GDPR 规定的任何权利，例如删除权或知情权，请按照上文第 1.4 条所述方式联系**许可合作伙伴**。

6. Role allocation between the Licensing Partner and Quality Austria
许可合作伙伴与 Quality Austria 之间的角色分工

6.1 Unless expressly agreed otherwise for a specific processing activity, the Licensing Partner and Quality Austria do not act as joint controllers within the meaning of Article 26 GDPR. Each party acts as an independent controller for processing activities for which it independently determines the purposes and means. Where the Licensing Partner processes personal data exclusively on documented instructions of Quality Austria, it acts as processor pursuant to Article 28 GDPR.
除非就某项具体处理活动另有明确约定，许可合作伙伴与 Quality Austria 不作为 GDPR 第 26 条所指的共同数据控制者。对于由各方独立决定处理目的和方式的处理活动，各方分别作为独立的数据控制者。若许可合作伙伴仅根据 Quality Austria 的书面指示处理个人数据，则其作为 GDPR 第 28 条规定的数据处理者。

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