

A Guide to Privacy Protection for Chinese Test Takers

The Chinese testing service website www.chinesetest.cn (hereinafter referred to as the "Website") is a website operated by CTI Co., Ltd. (hereinafter referred to as "CTI"). It provides users with various services including online information browsing and online test taker registration. Chinese test centers are the official test centers authorized by CTI to provide Chinese testing services around the world. CTI attaches great importance to protecting the privacy of test takers of Chinese tests. This Guide will brief you on how the Website collects, uses and stores your personal information as well as informing you of your rights.

1. Information Collection

In the course of registration and during the Chinese tests, we will collect test takers information in the following ways:

1.1 When you register for services on the Website, we will collect your name, gender, age, nationality, mother tongue, email address, phone number, type of ID, ID number, photograph, occupation, the number of years you have been learning Chinese, the reasons for you to learn Chinese and how you came to know about the Chinese tests. Your email address, phone number, type of ID, ID number and photograph are all sensitive information and are collected in order to meet the requirements on Internet real-name registration and test registration, as stipulated by relevant laws and regulations. Your refusal to provide such information may result in your inability to access our services.

1.2 The online payment service on the Website is provided by China Pay (for test takers from the Chinese mainland) and VISA, MasterCard, JCB (for some overseas test takers). When you activate the payment service on the Website, the third-party online payment company will collect your name, your ID number or your other legal ID document number, as well as the type, number and expiry date of your bank card and your phone number as recorded by your bank; when you make a payment on the Website, the third-party online payment company will also collect your payment record for your ease of reference. The above is sensitive information. Your refusal to provide such information may result in your inability to access the online payment service on the Website, but other services offered on the Website will still be available to you.

1.3 After the tests we will collect your test answers from the Chinese test centers for scoring. Test answers include answer sheets for paper tests, input for online tests and recordings for oral tests.

1.4 Your scores will be released on the Website at a stipulated date after the test.

1.5 Personal information which you have authorized to share may be obtained from the third-party Chinese test centers and, with your consent, this information may be transferred to CTI for their purposes, including test taker registration and score handling. For example, should you register for the tests offline at a third-party Chinese test center, we will check the legitimacy of the source of your personal information based on our agreements with the third party before using your personal information in accordance with relevant laws and regulations.

1.6 In the situations above, we may need to collect sensitive information from you or from the third-party Chinese test centers, including:

At the Chinese test centers we will collect your biometric samples, such as your photograph, voice and writing samples, in accordance with the law. We may collect audio and video recordings at the Chinese test centers (including from the monitoring equipment on the premise).

In all circumstances, we will only collect and use these types of personal information within the boundaries of the law and for CTI's legitimate business purposes (such as maintaining the security of the tests).

1.7 As the Chinese tests continue to be updated and developed, if a certain service has been omitted from the above passages and which results in your information being collected, we will notify you of the content, scope and purpose of the information collected by means of web page notices, interactive processes, web announcements, etc., in order to solicit your approval.

2. Information Storage

2.1 Place for Data Storage

In principle, personal information collected and produced in the territory of the Peoples Republic of China (PRC) is stored in the PRC.。

Information collected by third-party Chinese test centers for test taker registration purposes in the country where tests are organized is stored by the local Chinese test centers in that country in accordance with local laws and regulations; information needed for score handling and issuing of certificates will be uploaded on the Website and stored in the territory of the PRC.

2.2 Period for Data Storage

Generally speaking, we will only retain your information for as long as it is needed for relevant purposes, such as:

Phone number and email address: If you request the services on the Website, we need to keep your phone number and email address for you to access the services. We will remove the relevant information upon receiving your request to close your Website account.

Test answers: These are retained for two years only.

Scores: These are stored long term for ease of reference.

In the event of the test services ceasing operation, we will notify you in the form of notices, announcements, etc., and have your personal information removed or anonymised within a reasonable time frame.

3. Information Security

We strive to safeguard the security of test taker information in order to prevent any loss, misuse, unauthorized access to or disclosure of the information. These safeguard measures encompass various aspects such as physical, technical and administrative procedures.

During registration, the Website will request that you select a password to help protect your information. This password will help us verify your identity before granting access or making corrections to your personal information. Please never disclose your password to anyone. CTI shall never request that you disclose your password during an unsolicited phone call or in an email. If you believe that your password or your account has been hacked, please contact us as soon as possible.

We will take every safeguarding measure within reasonable levels of security to protect your information. For example, we will use encryption technology, anonymization and other means to protect your personal information.

We have established specialized management systems, procedures and institutions to guarantee information security. For example, we strictly limit the scope of people who have access to your information and request that they stay committed to their confidentiality obligations while conducting audits.

In the event of a leak of data or other security breaches, we will take emergency response measures to prevent further damage and notify you in the form of notices or announcements.

At present, the assessment and filing of the Website for National Cybersecurity Protection (Grade II) have been completed.

4. Information Usage

Personal information, test answers and scores are mainly used for test taker registration, the production of test admission tickets, entry checks of test takers at test halls, score inquiry, the creation of score reports, etc.

We may conduct general data analysis on the tests and share this with the public or a third party in order to demonstrate general trends and carry out studies related to the Chinese tests. However, these statistical data will not include any information that could compromise your identity.

When we present your personal information, we will ensure it is de-identified by means of content replacement and anonymization to guarantee the security of your personal information.

If we intend to use your personal information for purposes beyond what we claimed to use it for at the time of information collection or beyond the scope of direct or reasonable correlation to the claimed purposes, we will once again inform you and request your explicit consent before actually using it.

5. Sharing, Transfer and Disclosure of Information

5.1 Sharing

We will not share your personal information with any company, organization or individual other than CTI, except in the following circumstances:

1. Sharing with explicit consent: Upon your explicit consent, we will share your personal information with other parties. If required by law, we will inform you and obtain your explicit consent before sharing any sensitive information.

2. Sharing in legal situations: We may share your personal information when required by laws and regulations, litigation and dispute resolution needs, or under the legal orders of administrative and judicial authorities.

3. Sharing with authorized partners: Some of our services will be provided by us together with our authorized partners for the sole purpose of conducting the Chinese tests. We may share some of your personal information with our partners so as to provide better Chinese testing services—for example, your registered information. We will share your personal information for legitimate, justified, necessary, specific and definite purposes only, and will only share the personal information that is necessary for the delivery of services. Our partners are not authorized to use the shared personal information for other purposes unrelated to our products or services.

Currently, we have the following types of authorized partners:

(1) Chinese test centers: Official test centers authorized by CTI to provide Chinese testing services around the world.

(2) Suppliers, service providers and other partners: For example, we share information with printing houses that support our business to produce score reports for test takers.

5.2 Transfer

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

1. Transfer upon explicit consent: Upon your explicit consent, we will transfer your personal information to other parties. If required by law, we will inform you and obtain your explicit consent before transferring sensitive information.

2. In the event of the merger, acquisition or liquidation of service providers or other circumstances involving a merger, acquisition or liquidation and where personal information transfer is involved, we will require that the new company or organization holding your personal information be bound by this policy as well. Otherwise, we will require that the company, organization or individual solicit your authorization and consent.

5.3 Disclosure

We will disclose your personal information only in the following circumstances:

1. We may disclose your personal information upon your explicit consent or according to your own volition.

2. In cases in which your personal information must be provided in accordance with the requirements of laws and regulations and mandatory requirements made by the administrative, law enforcement or judicial authorities, we may disclose your personal information based on the type of personal information and the method of disclosure required. Under the condition of compliance with the laws and regulations, upon receiving the above mentioned requests for information disclosure, we shall require the presentation of corresponding legal documents, such as summons or investigation letters. We firmly believe that the information that we are required to provide should be kept as transparent as possible to the extent permitted by law. All requests have been discreetly reviewed for legality and are limited to data that is needed and may be rightfully acquired by the law enforcement department for specific investigation purposes only.

5.4 Exceptions to Obtaining Authorization Before Sharing, Transferring or Disclosing Personal Information

In the following circumstances, there is no need to obtain your authorization before sharing, transferring or disclosing your personal information:

1. Where national security and national defense are concerned.
2. Where public safety, public health and major public interest are concerned.
3. Where criminal investigation, prosecution, trial and execution of legal judgments are concerned.
4. Where the purpose is to protect your or other individuals' material and licit rights, such as life and property, and it is difficult to obtain the consent of the individuals themselves.
5. Where you disclose your personal information to the public of your own volition.
6. Where personal information is collected from legally disclosed information, such as legal news reports, open government information, etc.

In accordance with the law, sharing and transferring de-identified personal information on the condition that the recipient cannot restore that personal information for re-identification, does not constitute sharing, transfer and disclosure of personal information. Sharing and transfer of such data does not require your knowledge or consent.

6. Your Rights and Options

6.1 We respect your right to legitimately access and update your personal information. If you need to update your account information on the Website, you may log on to your account and update your information (with the exception of your registered email) at any time. If you wish to update your registered information for the tests, please refer to the regulations on the Chinese tests at <http://www.chinesetest.cn/regulation>.

6.2 We provide you with certain options on the Website so as to guarantee your right to close your account. You may also contact us on kaoshi@chinesetest.cn to have your personal information removed. We will have to verify your identity before we meet your request.

6.3. After you successfully register for a test, you will receive an email with test details. Upon your consent (or in the absence of your objection), we may send you emails related to CTI services, such as surveys or promotions. You may opt not to receive these emails by clicking the "Unsubscribe" link at the bottom of the email. However, please note that you cannot unsubscribe to emails regarding test details in order to ensure the successful completion of the tests by the test takers.

7. Amendment

We may make timely amendments to this Guide. In the case of any changes to the terms of the Guide, we will present the revised version to you in the form of push notifications and pop-up windows when you log on to the Website. Please note that we will collect, use and store your personal information based on the revised version of the Guide only if you click on the "I Agree" button in the pop-up window.

8. Transfer of Personal Information of International Users

The Website and its servers are located in China. Therefore, your information (including personal information) will be transferred from your location to China. We will, however, protect your information in accordance with the terms of the Guide.

9. Information about Cookies and Other Data Collection Technologies

When you visit our Website, we will not collect any of your information by automated means based on cookies, such as pixel tags, web analytics tools, server logs and web beacons.

10. Protection of Minors

10.1 In most circumstances, we will not use the Website to collect personal information directly from minors under the age of 16. Parents and schools may use our Website to create accounts for children—for instance, to help them register for tests. We encourage parents and teachers to accompany and supervise children in the course of online activities. If you believe that your child has created an account on our Website in the absence of guardianship, please contact us on kaoshi@chinesetest.cn to have the account removed.

10.2 When underage children register for tests, we may collect their information, such as their names and ages. During the tests, we collect their answers to test questions and take note of the time it takes for them to give their answers. We record their voices during oral tests. We will not collect any personal information beyond the items listed in Article 1.1–1.5 of the Guide and will not use cookies or other data collection technologies.

10.3 CTI will have the information anonymized when it is used for research purposes. CTI does not retain the identifiable data of children, and children cannot make their own data publicly available via the Website. CTI will not (nor will it permit any third party to) associate identifying information with research data.

11. Contact Us

If you have any questions, suggestions or complaints on the above contents, please contact us on kaoshi@chinesetest.cn. We will review the concerns raised as quickly as possible and reply to you within thirty days of verifying your user identity.