

## PRIVACY STATEMENT FOR EXAM CANDIDATES

### 适用于考生的隐私声明

#### 1. Introduction

##### 引言

This privacy statement is for you if you are a candidate taking an exam or an applicant registering for a qualification with Trinity College London International Limited<sup>1</sup> ('Trinity', 'us', 'our' or 'we') or our validated course providers or validated course and assessment providers, and for your parents and guardians (if applicable). This includes your involvement in any test or trial connected with Trinity's online assessment tools.

签字并盖章 Trinity College London International Limited (“Trinity”或“我们”) 或我们的验证课程提供商或验证课程和评估提供商参加考试的考生或注册认证的申请人, 则本隐私声明适用于您以及您的父母和监护人(如适用)。这包括您参加与 Trinity 在线评估工具相关的任何测试或试验。

Trinity is committed to protecting the privacy and security of your personal data. This privacy statement provides information about the different types of personal data that we collect during the exam process, the ways in which we use these and your data protection rights, including a right to object to some of the processing which we carry out.

Trinity 致力于保护您个人信息的隐私和安全。本隐私声明提供的信息涉及我们在考试过程中收集的不同类型的个人信息、我们使用这些信息的方式以及您的信息保护权利, 包括反对我们进行某些处理的权利。

You may also be subject to specific terms and conditions of booking for your exam which are for the protection of both you and us, so we advise that you please take the time to read them carefully. In addition, you are advised to read our [Data Protection Policy](#).

为了保护您也保护我们, 您参加考试可能还需要遵守具体的预订条款和条件, 因此我们建议您花点时间仔细阅读这些条款和条件。此外, 建议您阅读我们的[信息保护政策](#)。

#### 2. Our role

##### 我们的角色

Trinity is a data controller in respect of any personal information we collect about you.

对于我们收集的有关您的任何个人信息, Trinity 属于信息控制者。

Trinity is a company authorised by a leading international awarding organisation to host exams for providing regulated qualifications in the English language and in a range of disciplines in the performing arts. As a data controller, we are committed to protecting your privacy at all times in accordance with all applicable laws and regulations governing the use or processing of personal data, including without limitation (i) (where applicable) the General Data Protection Regulation (EU) 2016/679 ('GDPR') and the Data Protection Act 2018 (each as amended from time to time, and in the case of the GDPR, as incorporated into UK law, including by any legislation arising out of the withdrawal of the UK from the European Union) and any subsequent data protection legislation which is in force in the UK at the relevant time, and (ii) the Cybersecurity Law of the PRC, the Personal Information Protection Law of the PRC, the Data Security Law of the PRC and relevant implementation rules, specifications and national standards on data protection).

Trinity 是一家经领先的国际颁证组织授权的公司, 负责举办英语和一系列表演艺术学科的官方认可认证考试。作为信息控制者, 我们致力于根据所有适用的个人信息使用或处理方面的法律法规始终保护您的隐私, 包括但不限于 (i) (如适用) 2016/679《通用数据保护条例》(欧盟) (“GDPR”) 和 2018 年《数据保护法》(均以不时修订的版本为准, 对于 GDPR, 以纳入英国法律的版本为准, 包括通过英国退出欧盟所产生的任何立法) 以及英国在相关时间有效的任何后续信息保护立法, 及 (ii) 中国《网络安全法》、中国《个人信息保护法》、中国《数据安全法》以及有关信息保护的相关实施细则、规范和国家标准。

#### 3. When and what personal information do we collect?

##### 我们何时收集个人信息以及收集什么个人信息?

<sup>1</sup> Trinity College London International Limited is a limited company incorporated in England with company number 08219486 whose registered office is at Blue Fin Building, 110 Southwark Street, London, SE1 0TA, UK.

## Information you give to us directly

### 您直接提供给我们信息

We will collect certain personal data about you when you apply to take a qualification with Trinity.

我们会在您向 Trinity 申请认证时收集您的某些个人信息。

We may collect, store and use the following information from you:

我们可能会收集、存储和使用您的以下信息：

- your full name and contact details, including email address, postal address and telephone number;  
您的全名和联系方式，包括电子邮件地址、邮寄地址和电话号码；
- your unique candidate identifier and password (to access our online assessment tools);  
您（访问我们的在线评估工具）的唯一考生标识符和密码；
- your gender, date of birth and any special needs requests;  
您的性别、出生日期和任何特殊需求要求；
- information that we require to verify your identity, such as the details of your identity documentation and/or a photograph and/or copy of your passport, driving licence or other identity documentation;  
我们验证您身份所需的信息，比如您身份证件的详细信息和/或护照、驾照或其他身份证明的照片和/或副本；
- image, video and/or audio recordings, including of the exam you undertake;  
图像、视频和/或音频记录，包括您参加的考试的记录；
- information about your communication preferences;  
有关您的通讯偏好的信息；
- name and contact details of parent/guardian for candidates where applicable;  
考生的父母/监护人的姓名和联系方式（如适用）；
- other information about your application provided on your application form, information relating to your exam performance and assessment and your exam results; and/or  
您在申请表中提供的有关您的申请的其他信息，与您的考试成绩和评估以及考试结果相关的信息；及/或
- where exams are undertaken at home, we also process the contents of your screen that are shared with the invigilator, and any images, video and audio recordings of any chaperone that accompanied you during your exam.  
如果在家中考试，我们还会处理与监考人共享的屏幕内容，以及考试期间陪同的任何监护人的任何图像、视频和音频记录。

## Information we obtain indirectly

### 我们间接获得的信息

Your personal information (as listed above) may also be shared with us by third parties. For instance, we may receive it from your training provider, validated course provider or validated course and assessment provider, exam service provider, parent or guardian.

(上文所列的)您的个人信息也可能由第三方与我们共享。例如,我们可能会从您的培训提供商、验证课程提供商或验证课程和评估提供商、考试服务提供商、家长或监护人处收到这些信息。

## 4. Special categories of information

### 特殊类别信息

Certain categories of personal information are categorised as sensitive and require higher levels of protection. These categories of data include information about health and ethnicity.

某些类别的个人信息被归类为敏感信息,需要更高级别的保护。这些类别的信息包括关于健康和种族的信息。

We may collect and/or use special categories of data in connection with our qualifications and the provision of our services, for example, in order to make adjustments for any disabilities you may have. We may also collect race, nationality or ethnicity data from you (should you choose to provide it), to ensure meaningful equal opportunity monitoring, reporting and treatment.

我们可能会就我们的认证和服务收集和/或使用特殊类别的信息,例如,为了针对您可能存在的任何残疾进行调整。我们还可能收集您的种族、国籍或族裔信息(如果您选择提供的话),以确保落实平等机会监测、报告和待遇。

We will only process these special categories of data if there is a valid reason for doing so and where the applicable data protection laws allow us to do so.

只有在有正当理由且适用的信息保护法律允许的情况下,我们才会处理这些特殊类别的信息。

## 5. How do we use your personal information?

### 我们如何使用您的个人信息?

We may use your personal information for one or more of the following purposes:

我们可能将您的个人信息用于以下一个或多个目的:

- providing you with information and news about our exams;  
为您提供有关我们考试的信息和新闻;
- considering and processing your application for one of our qualifications and communicating with you in connection with your registration and exam results, including by providing you with a copy of your certificate where appropriate – this may also include updating your national learner record where relevant or necessary;  
考虑并处理您的认证申请,并就您的注册和考试结果与您沟通,包括在适当时向您提供证书——这可能还包括在相关或必要时更新您的国家学员记录;
- carrying out necessary checks to verify your identity, as may be necessary as part of our exam registration process;  
作为我们考试注册流程的一部分,进行必要的检查,以验证您的身份;
- retaining a record of incoming and outgoing communications (e.g., emails, telephone calls) – information in the email we receive and send will not be disclosed to any third party without the permission of the sender unless otherwise permitted in accordance with the applicable data protection laws;  
保留传入和传出通讯(例如电子邮件、电话)的记录——未经发件人允许,我们接收和发送的电子邮件中的信息不会披露给任何第三方,除非适用的信息保护法律另行允许;
- dealing with your enquiries and requests or those made on your behalf by anyone who booked your exam;  
处理您的查询和要求,或为您预订考试的任何人代表您提出的查询和要求;
- monitoring malpractice;  
监测不当行为;
- dealing with complaints and appeals;  
处理投诉和上诉;
- using exam audio and video recordings, assessment decisions, results and other personal data for research, educational resources and professional support materials, statistical, training (including training materials) and standardisation purposes and to combat exam malpractice;  
将考试音频和视频记录、评估决定、结果和其他个人信息用于研究、教育资源和专业支持材料、统计、培训(包括培训材料)和标准化目的,并打击考试舞弊行为;

- to monitor the quality of assessments and to test, develop, receive feedback on and improve our assessment tools and products;

监测评估质量，测试、开发我们的评估工具和产品、接收相关反馈并予以改进；

- to create aggregate and statistical data (which cannot be used to identify you). For example, aggregate data may include data that describes the general demographics, usage or other characteristics of our exam candidates. We may use this aggregate and statistical data for marketing and publicity purposes or for educational resources, training and professional support materials;

创建汇总统计信息（不能用于识别您的身份）。例如，汇总信息可能包括描述考生的一般人口统计数据、使用或其他特征的信息。我们可能会将这些汇总统计信息用于营销和宣传目的，或用于教育资源、培训和专业支持材料；

- to satisfy legal obligations which are binding on us;

履行对我们有约束力的法律义务；

- for the prevention of fraud or misuse of service;

防止欺诈或滥用服务；

- to participate in marketing and academic surveys;

参与市场营销和学术调查；

- to verify and carry out financial transactions in relation to payments made by you; and/or

核实并执行与您支付的款项有关的金融交易；及/或

- to enforce compliance with our terms of use and other policies or otherwise in connection with the establishment, defence or enforcement of legal claims, compliance, regulatory and investigatory purposes as necessary (including disclosure of such personal information as is required in connection with legal process or litigation).

强制遵守我们的使用条款和其他政策，或在必要时用于确立、抗辩或执行法律索赔、合规、监管和调查目的（包括根据法律程序或诉讼所需披露该等个人信息）。

## 6. Lawful processing

### 合法处理

We are required to rely on a lawful ground to collect and use the personal information above, as follows:

我们必须依据合法理由收集和使用上述个人信息，具体如下：

**Consent** – Where you have provided your consent for our use of your personal information in a certain way. When we ask you for consent we will explain at that time the purpose for which we will use your personal information. For example, where we ask for your consent to send you our newsletter or information about our products, publications and programmes of events, or where we invite you to participate in marketing and academic surveys. Where applicable, we may require the consent of your parent or guardian.

**同意** - 您已同意我们以某种方式使用您的个人信息。当我们征求您同意时，我们会解释使用您个人信息的目的。例如，我们征求您同意向您发送有关我们产品、出版物和活动计划的简讯或信息，或我们邀请您参加营销和学术调查时。如适用，我们可能需要您的父母或监护人同意。

**Legal obligation** – Where the processing of your personal information is necessary for us to comply with a legal obligation. For example, to comply with our obligation to provide reasonable adjustments to candidates with a disability, or where we respond to requests by government, regulatory or law enforcement authorities conducting an investigation.

**法律义务** - 为遵守法律义务，我们需要处理您的个人信息。例如，为了遵守我们为残疾考生提供合理调整的义务，或者响应政府、监管或执法机构进行调查的要求。

**Legitimate interests** – We rely on this basis where applicable law allows us to collect and use personal information for our legitimate interests of delivering and monitoring our qualifications, and the use of your personal information is fair, balanced, and does not unduly impact your rights. For instance, it is in Trinity's legitimate interest to process personal data when Trinity makes video or audio recordings of our exams in order to monitor the quality of our assessments and/or for testing, feedback, research and training purposes. You can obtain information on our legitimate interest balancing tests by contacting us using the details set out later in this notice. For avoidance of doubt, where applicable law does not recognize "legitimate interests of data controllers" as a lawful basis for collecting and processing personal information, we rely on such other lawful bases described in this section or otherwise permitted under applicable law for the collecting and processing of your personal information.

**合法利益** - 依赖这一依据的条件是适用法律允许我们收集和使用个人信息以实现我们的合法利益（即提供和监测我们的认证），并且对您个人信息的使用是公平、平衡的，不会对您的权利造成不当影响。例如，在 Trinity 为监测我们的评估质量和/或为测试、反馈、研究和培训目的对我们的考试进行视频或音频记录时，处理个人信息即属 Trinity 的合法利益。您可以使用本声明后面列出的详细信息联系我们，获取有关我们合法利益平衡测试的信息。为避免疑

义，如果适用法律不认可“信息控制者的合法利益”为收集和處理个人信息的合法依据，我们将依赖本条描述或适用法律允许的其他合法依据来收集和處理您的个人信息。

**Contractual relationship** – Where it is necessary for us to process your personal information in order to perform a contract to which you are a party, or to take steps at your request prior to entering a contract. For example, to provide our exam services to you, to provide you with support resources (where available) or to issue you with a qualification certificate where you successfully complete a qualification

**合同关系** - 我们需要處理您的个人信息，以履行您作为一方的合同，或在签订合同之前根据您的要求采取行动。例如，为您提供我们的考试服务，为您提供支持资源（如有），或在您成功完成认证时为您颁发认证证书。

## 7. Sharing your personal data

### 共享您的个人信息

We will not sell, rent or lease your personal information to others. We will only share personal information we collect from you with:

我们不会将您的个人信息出售、出租或出借给他人。我们将仅与以下对象共享我们向您收集的个人信息：

- the international awarding organisation that authorises us to host exams, our centres, exam service providers and local representatives who deliver information and services in relation to our exams in your locality;  
授权我们主办考试的国际颁证组织、我们的中心、考试服务提供商和在您所在地提供我们的考试相关信息和服务的当地代表；
- the schools, colleges, education centres, local authorities and any other entity that provides training courses preparing for a qualification awarded by us, to the extent necessary to provide them with information about your results;  
针对我们授予的认证提供培训课程的学校、学院、教育中心、地方机构和任何其他实体（在向它们提供有关您的结果的信息所需的范围内），；
- those persons or bodies contracted by us to carry out the roles of examiner, marker, advisor, moderator, proctor, tutor, consultant, steward, representative or other similar roles on our behalf in the context of our provision of qualifications and/or in the course of providing training, educational resources or other support materials to such persons or bodies;  
与我们签订合同，在我们提供认证的情况下代表我们担任考官、阅卷人、顾问、监督员、监考员、导师、咨询顾问、管理员、代表或其他类似角色的人员或机构，及/或在向该等人员或机构提供培训、教育资源或其他支持材料的过程中共享；
- other exam candidates in the context of relevant exams, such as exam candidates participating with you in the discussion component of an ESOL Skills for Life exam;  
相关考试的其他考生，比如与您一起参加 ESOL 生活技能考试讨论部分的考生；
- the service providers we engage to provide our online assessment tools, test and process results data and produce qualification certificates on our behalf;  
我们聘请的代表我们提供在线评估工具、测试和處理结果信息并出具认证证书的服务提供商；
- our marketing automation tool service providers, for the purpose of managing email lists and issuing communications on our behalf;  
我们的营销自动化工具服务提供商，以便代表我们管理电子邮件列表和发布通讯；
- other companies in our group, such as our parent company, affiliate companies and subsidiaries, where they are providing support services to us;  
我们集团的其他公司，比如我们的母公司、关联公司和子公司（在他们向我们提供支持服务的情况下）；
- your parents and/or guardians (of children under 18 years of age), where parents and/or guardians raise a specific request in relation to, or ask to view, your personal information or where we need to obtain consent from your parents and/or guardians (for children who are below the age of consent under applicable law of the jurisdiction of residence, for example, children under the age of 14 in mainland China) or where we have any concerns;  
您（如果不滿 18 周岁）的父母和/或监护人（如果父母和/或者监护人提出与您的个人信息相关的特定要求或要求查看您的个人信息，或我们需要获得您的父母和/或监护人同意（适用于未达到居住地适用法律规定的同意年龄的未成年人，例如中国大陆不滿 14 周岁的未成年人）或我们有任何顾虑）；
- our academic research partners, for monitoring assessment and the development of assessment tools and products; and/or  
我们的学术研究合作伙伴，以便监测评估和开发评估工具和产品；及/或
- as required by law to any law enforcement, regulatory or other government bodies, or to any relevant universities, schools, colleges, local authorities or other such entities to the extent required to progress your applications to such

entities – for example, we may share your personal data with a university for admission purposes or, where required, with the relative governmental departments for statistical purposes.

根据法律要求与任何执法、监管或其他政府机构共享，或与任何相关大学、学校、学院、地方机构或其他此类实体共享，前提是为推进您向该等实体提出的申请所需 - 例如，我们可能出于录取目的与大学共享您的个人信息，或在需要时为统计目的与相关政府部门共享。

We may disclose your personal data to our exam service providers who provide administrative services in relation to our exams. We may also disclose your personal information to selected third party processors (such as agents and our suppliers) but only in connection with our own processing purposes, as outlined above in paragraph 5. Any such third party will be required to use any personal data they receive from us in accordance with our instructions and the applicable data protection laws.

我们可能会将您的个人信息披露给我们的考试服务提供商，他们为我们的考试提供管理服务。我们也可能向选定的第三方处理者（比如代理商和我们的供应商）披露您的个人信息，但仅限于上文第 5 条所述的我们自己的处理目的。任何该等第三方均需根据我们的指示和适用的信息保护法律使用他们从我们这里收到的任何个人信息。

We reserve the right to disclose your personal information to third parties:

我们保留在下述情况下向第三方披露您个人信息的权利：

- if we buy or sell any business or assets or if most of our assets are acquired by a third party, in which case we will disclose your personal information to the prospective buyer or seller of such business or assets;

如果我们购买或出售任何业务或资产，或我们的大部分资产被第三方收购，在此情况下，我们将向该等业务或资产的潜在买方或卖方披露您的个人信息；

- for auditing purposes, for example where we employ chartered accountants;

出于审计目的，例如在我们雇佣特许会计师的情况下；

- if we or our authorising organisation are under any legal or regulatory obligation to do so (for example as required by our regulators or our authorising organisation's regulators, e.g., the Office of Qualifications and Examinations Regulation (Ofqual) or the Information Commissioner's Office ('ICO')); and/or

如果我们或我们的授权组织有任何法律或监管义务这么做（例如，我们的监管机构或我们授权组织的监管机构要求，例如资格认证和考试监管办公室（Ofqual）或信息专员办公室（“ICO”））；及/或

- in connection with any legal proceedings or prospective legal proceedings, in order to establish, exercise or defend our legal rights.

与任何法律诉讼或预期的法律诉讼有关，以便确立、行使或捍卫我们的法律权利。

## 8. International data transfers

### 国际信息传输

Where we transfer personal information we adopt all relevant measures required by the data protection laws. As we sometimes use third parties to process personal information, it is possible that personal information we collect from you will be transferred to and stored in a country that has a lower standard of protection for personal information, including lower security protections.

如果我们传输个人信息，我们将采取信息保护法律要求的所有相关措施。由于我们有时使用第三方来处理个人信息，我们向您收集的个人信息可能会传输到并存储在个人信息保护标准较低（包括安全保护水平较低）的国家。

Where your personal information is transferred, stored, and/or otherwise processed in a country which does not offer an equivalent standard of protection, we will put in place appropriate transfer mechanisms as required under the relevant data protection laws and take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information.

如果您的个人信息在未提供同等保护标准的国家传输、存储和/或以其他方式处理，我们将按照相关信息保护法律的要求落实适当的传输机制，并采取一切必要的合理步骤，确保接收方实施适当的保护措施保护您的个人信息。

If you have any questions about the transfer of your personal information, please contact us.

如果您对您的个人信息的传输有任何疑问，请联系我们。

## 9. Your rights

### 你的权利

Where we rely on your consent to use your personal information, you have the right to withdraw your consent at any time. Under certain circumstances, you have the right to:

如果我们需要您同意才能使用您的个人信息，您有权随时撤回同意。在某些情况下，您有权：

- a) **Request access** to your personal information (by a 'data subject access request'). This enables you to receive a confirmation from us as to whether we process any of your personal information or not, and if this is the case, to

receive a copy of such personal information and to check that we are lawfully processing it. For further details please refer to the [Data Subject Access Request Policy](#).

**请求查阅**您的个人信息（通过“**信息主体查阅请求**”进行）。通过行使该权利，您可以收到关于我们是否处理您的任何个人信息的确认，并在我们处理您的个人信息的情况下，收到该等个人信息的副本并检查我们的处理是否合法。如需进一步的详细信息，请参阅[信息主体查阅请求政策](#)。

- b) **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**请求更正**我们持有的有关您的个人信息。通过行使该权利，您可以更正我们持有的关于您的任何不完整或不准确的信息。

- c) **Request erasure** of your personal information (often referred to as ‘the right to be forgotten’). This enables you to ask us to delete or remove personal information where there is no appropriate reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**请求删除**您的个人信息（通常称为“被遗忘权”）。通过行使该权利，您可以要求我们在没有适当理由继续处理个人信息的情况下删除或移除个人信息。您也有权要求我们在您已行使反对处理权（见下文）的情况下删除或移除您的个人信息。

- d) **Object to the processing** of your personal information where we are relying on a legitimate interest (ours or those of a third party) and there is something about your particular situation which causes you to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes.

**反对处理**您的个人信息，前提是我们依赖（我们或第三方的）合法利益而您的特定情况导致您反对基于该理由进行处理。如果我们出于直接营销目的处理您的个人信息，您也有权反对。

- e) **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example, if you want us to establish its accuracy or the reason for processing it.

**请求限制处理**您的个人信息。通过行使该权利，您可以要求我们暂停处理您的个人信息，例如，如果您希望我们确定其准确性或处理原因。

- f) **Request the transfer of** your personal information to another party.

**请求**将您的个人信息**转移**至另一方。

Parents and/or guardians may be able to exercise some of these rights on behalf of their child (who is under the age of 18 years) in connection with their child’s personal information, though, depending on the circumstances, we may need to keep the child informed of such exercise of their rights by a parent and/or guardian.

父母和/或监护人可能可以代表其（不满 18 周岁的）子女就子女的个人信息进行其中一些权利，但根据情况，我们可能需要让子女了解父母和/或监护人行使其权利的情况。

Your rights described above may be limited in some instances where statutory exemptions apply, such as where they would infringe the rights of a third party or our rights or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. For example, under data protection laws, Trinity is not required to provide personal data comprising information recorded by candidates during exams and/or in circumstances where its release would adversely affect our rights in the intellectual property and confidentiality of our exams or reveal the personal data of another data subject. We will inform you of the relevant exemptions we rely upon when responding to any request you make.

在适用法定豁免的某些情况下，您的上述权利可能会受到限制，比如，如果这些权利会侵犯第三方的权利或我们的权利，或者如果您要求我们删除法律要求我们保留或我们有令人信服的合法利益予以保留的信息。例如，根据信息保护法律，如果个人信息包含考生在考试期间记录的信息和/或若发布会对我们的知识产权和我们考试的保密性产生不利影响，或会泄露其他信息主体的个人信息，则 Trinity 无需提供该等个人信息。我们将在回应您的任何请求时向您告知我们依赖的相关豁免情形。

To exercise any of these rights or to obtain other information, such as a copy of a legitimate interests balancing test, you can get in touch with us by contacting our Data Protection Officer using the details set out at the end of this document. If you have unresolved concerns, you have the right to complain to a data protection authority where you are based or where you believe a breach may have occurred.

为了行使这些权利或获取其他信息，比如合法利益平衡测试的副本，您可以使用本文件末尾所述的详细信息联系我们的信息保护官，与我们联系。如果您有未解决的问题，您有权向您所在地或您认为可能已发生违规之地的信息保护机构投诉。

## 10. Marketing communications and your rights

### 营销通讯和您的权利

Except in relation to individuals who have already signed-up for an exam, event or other service or good from us, Trinity operates a strict ‘opt-in’ policy for individuals. That means that where you have already signed-up for an exam, event or other good or service from Trinity, we may send you news and information of similar exams, events, goods or services that we provide until we are informed that this communication is no longer required. We will give you an opportunity to ‘opt-out’ of receiving such communications at the time that we collect your personal information and every time after that when we

contact you with such communications. In all other cases, we will not send you any information unless you have requested to receive email/text/social media message updates from us.

除与已注册我们的考试、活动或其他服务或商品的个人相关的情况外，Trinity 对个人实行严格的“选择加入”政策。这意味着如果您已经注册 Trinity 的考试、活动或其他商品或服务，我们可能会向您发送我们提供的类似考试、活动、商品或服务的新闻和信息，直到您告知我们不再希望接收该等通讯。在我们收集您的个人信息时，以及之后每次通过该等通讯与您联系时，我们将为您提供“选择退出”接收该等通讯的机会。在所有其他情况下，我们不会向您发送任何信息，除非您要求接收我们的电子邮件/文本/社交媒体消息更新。

You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by clicking on the unsubscribe link in the relevant email or message, or by emailing us at [unsubscribe@trinitycollege.com](mailto:unsubscribe@trinitycollege.com). Once this information is received we will remove you from our direct marketing database. We may require the consent of a parent or guardian where a child who is below the age of consent under applicable law of the jurisdiction of residence wishes to ‘opt-in’ to receive such updates from us.

您享有绝对权利随时选择退出直接营销或我们为直接营销进行的画像分析。您可以通过点击相关电子邮件或消息中的退订链接，或发送电子邮件至 [unsubscribe@trinitycollege.com](mailto:unsubscribe@trinitycollege.com) 退出。一旦收到此信息，我们会从直接营销数据库中将其删除。如果根据居住地的适用法律不赞同意年龄的未成年人希望“选择加入”以接收我们的更新讯息，我们可能需要父母或监护人同意。

## 11. Security of your data

### 信息安全

Trinity takes its security obligations under the data protection laws seriously. We will endeavour to take all reasonable steps to protect your personal information in order to prevent unauthorised access to or alteration or destruction of personal data in our possession. All the personal information we collect is stored securely on servers and we use secure internet protocols and secure networks to protect data collection and processing.

Trinity 非常重视信息保护法律规定的安全义务。我们将尽力采取一切合理措施保护您的个人信息，以防止未经授权而访问、篡改或销毁我们持有的个人信息。我们收集的所有个人信息都安全地存储在服务器上，我们使用安全的互联网协议和安全的网络来保护信息收集和处理。

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

我们已制定程序来处理任何可疑的数据泄露，并将在法律要求的情况下，向您和任何适用的监管机构告知可疑的数据泄露。

## 12. How long do we keep your personal information for?

### 我们会保存您的个人信息多久？

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In determining the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Information which is necessary to verify or confirm exam results may be kept by us indefinitely. For more details please contact us using the details set out in paragraph 13.

我们将只在为实现我们收集信息的目的（包括为了满足任何法律、会计或报告要求）而必要的期限内保留您的个人信息。在确定您个人信息的适当保留期时，我们会考虑个人信息的数量、性质和敏感性，未经授权而使用或披露您个人信息的潜在危害风险，我们处理您个人信息的目的，我们是否可以通过其他方式实现这些目的，以及适用的法律要求。我们可能会无限期保留验证或确认考试结果所需的信息。如需了解更多详情，请使用第 13 条所载的详细信息与我们联系。



### 13. Contact us or the ICO

#### 联系我们或 ICO

We have appointed a Data Protection Officer ('DPO') to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, or if you wish to make a complaint, please contact the DPO at [dpo@trinitycollege.com](mailto:dpo@trinitycollege.com)

我们已任命一名信息保护官（“DPO”）来监督对本隐私声明的遵守情况。如果您对本隐私声明或我们如何处理您的个人信息有任何疑问，或者希望提出投诉，请通过 [dpo@trinitycollege.com](mailto:dpo@trinitycollege.com) 联系 DPO。

You can also contact or make a complaint at any time to the ICO on 00 44 (0)303 123 1113.

您也可以随时通过 00 44 (0) 303 123 1113 联系 ICO 或向 ICO 投诉。

### 14. Changes to this privacy statement

#### 本隐私声明的变更

We may update this privacy statement from time to time. When we do, we will publish the updated version on our website. If material changes are made to this privacy statement we will notify you by email or by placing a prominent notice on the website.

我们可能会不时更新本隐私声明。届时，我们将在我们的网站上发布更新版本。如果本隐私声明发生重大变更，我们将通过电子邮件或在网站的显眼位置发布告知通知您。

#### *Document owner and approval*

##### *文件负责人和批准*

*The Data Protection Officer is the owner of this document and is responsible for ensuring that this document is reviewed in line with the review requirements.*

信息保护官是本文件的负责人，负责确保按照审核要求审核本文件。

*Effective date:*

*01 January 2025*

生效日期

*Date of next review:*

*01 January 2026*

下次审核日期

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