

# 中兴通讯隐私政策

## ZTE Privacy Policy

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### 引言 Introduction

中兴通讯股份有限公司及其子公司（统称为“中兴通讯”，“我们”）尊重您的隐私，并非常重视个人信息的安全性。您在使用我们的产品与/或服务时，基于您的同意、您和我们之间的合同关系或者合法利益等适用的法律依据，我们可能会收集和使用您的相关个人信息。我们遵循以下隐私保护原则，为您提供更加安全、可靠的服务：

ZTE Corporation and its subsidiaries (collectively, "ZTE", "us", "we", or "our") respect your privacy. The security of your personal data is important to us. We may collect and use your personal data when you use our products and/or services based on applicable legal basis, including your consent, contractual relationship, and legitimate interests. We abide by the following privacy protection principles to provide secure and reliable services:

- 合理必要：为了向您提供相关产品或服务，我们仅限于实现处理目的的最小范围收集必要的信息。
- 安全可靠：我们竭尽全力通过合理有效的信息安全技术及管理流程，保障您的个人信息的安全。
- 公开透明：我们努力使用通俗易懂的语言，使您清晰地了解我们处理您的个人信息的目的、方式和范围。
- 将隐私保护融入产品设计：我们在产品和服务研发、运营的各个环节，融入隐私保护的设计。
- 自主选择：我们为您提供便利的信息管理选项，以便您做出合适的选择，管理您的个人信息。
- Reasonable and necessary: To provide products or services, ZTE only collects necessary personal data within the minimum scope for the purpose of providing the products or services.

- **Secure and reliable:** ZTE will make every effort to ensure the security of your personal data through reasonable and effective information security technologies and management processes.
- **Open and transparent:** ZTE uses concise and plain language for you to clearly understand the purposes, methods, and scope of our processing of your personal data.
- **Integrating privacy protection into product design:** ZTE integrates privacy protection into every procedure of R&D and operation of products and services.
- **Freedom of choice:** ZTE provides convenient information management options, so that you can properly manage your personal data.

中兴通讯隐私政策（以下简称“本隐私政策”）向您说明我们如何收集、使用、存储、共享和转让您的个人信息，以及我们为您提供的访问、更新、删除和保护您的个人信息的方式。

ZTE Privacy Policy (hereinafter referred to as "this Policy") describes how the company collects, uses, stores, shares, and transfers your personal data, and how you can access, update, delete, and protect such data.

在您向中兴通讯提交个人信息之前，请仔细阅读并理解本隐私政策。

Please take a moment to familiarize with this Policy before providing personal data to ZTE.

本隐私政策有助于您了解以下内容：

This Policy helps you understand the following:

1. 我们处理的个人信息
2. 我们处理个人信息的目的和依据
3. 我们如何保护和存储个人信息
4. 我们如何共享、转让、披露您的个人信息
5. 您所享有的权利
6. 我们如何使用 Cookies 和类似技术

7. 您的个人信息如何跨境转移
8. 我们如何保护儿童的个人信息
9. 本隐私政策如何更新
10. 如何联系我们
1. Personal Data We Process
2. Our Purposes and Legal Basis for Processing Your Personal Data
3. How We Protect and Retain Your Personal Data
4. How We Share, Transfer, and Disclose Your Personal Data
5. Your Rights
6. How We Use Cookies and Similar Technologies
7. Cross-Border Transfer of Your Personal Data
8. How We Protect Children's Personal Data
9. Updates to This Policy
10. Contact Us

由于中兴通讯提供众多的产品和服务，本隐私政策可能并不能完全涵盖所有产品和服务项下所有可能的个人信息处理场景。相关产品和服务有其特定的隐私政策，该特定隐私政策将更具体地说明我们在该产品和服务中如何处理您的个人信息。如本隐私政策与特定产品和服务的隐私政策有不一致之处，请以特定的隐私政策为准。

**ZTE provides a large variety of products and services, and this Policy may not address all possible data processing scenarios. ZTE may inform you of data processing scenarios related to specific products and services through corresponding privacy policies. Such privacy policies describe in detail how we process your data when you use these products or services. If there is any conflict between this Policy and the**

**privacy policy for a specific product or service, the specific privacy policy shall prevail.**

如对本隐私政策有任何问题，可以按照本隐私政策第 10 条提供的联系方式联系我们。

For any questions about this Policy, please contact us through the channel provided in Article 10 of this Policy.

## **1. 我们处理的个人信息 Personal Data We Process**

个人信息是指以电子或者其他方式记录的与已识别或者可识别的自然人有关的各种信息，不包括匿名化处理后的信息。个人信息会在您使用我们的产品、服务或网站，或与我们发生信息交互时直接或间接地被我们收集。我们根据法律法规的要求，遵循合法、正当、必要和诚信的原则，仅收集实现产品功能所必要的个人信息，且仅将收集的信息用于明示的用途。我们处理的个人信息主要包括：

Personal data refers to any data that, either recorded electronically or otherwise, relates to an identified or identifiable natural person, and does not include anonymized data. ZTE may directly or indirectly collect such data when you use our products, services or websites, or when you interact with us. In accordance with the requirements of laws and regulations, we follow the principles of lawfulness, legitimacy, necessity, and integrity, collect only the personal data necessary for the implementation of product functions, and use the collected personal data for the explicit purposes only. The personal data that we process includes the following:

### **1.1 您在使用我们的服务时主动提供的信息**

1.1.1. 您在注册或使用我们的产品或服务时，主动填写或上传的昵称、手机号码、Email 等账号信息；

1.1.2. 您在使用我们的客服或售后服务时所提交的姓名、电话、Email、设备信息、故障描述等信息；

我们一些特定的服务可能需要您提供特定的个人信息来实现相关功能。若您选择不提供该类信息，将不会影响您使用产品或服务中的其他功能。

### **1.1 Personal data you provide when using our services**

1.1.1 Account data such as the nickname, mobile phone number, email address and other personal data you provide when registering or using our products or services;

1.1.2 The name, telephone number, email address, device-related data, fault descriptions and other personal data that you submit when using our customer services or after-sales services;

To implement related functions of some of services, you may need to provide specific personal data. If you opt not to provide such personal data, other functions of the product or service will not be affected.

## 1.2 我们在您使用服务时获取的信息

### 1.2.1 日志信息

我们有些产品或服务仅针对特定设备型号（如某些型号的手机）或应用程序提供，在您开通和使用我们产品或服务过程中，为识别账号异常状态、设备异常状态以及了解和优化产品适配性，我们可能会收集您的相关设备信息、软件信息和服务日志信息，从而为您提供相关服务。

### 1.2.2 位置信息

当您使用与位置有关的产品或服务时（如亲情定位、手机找回），我们可能会在必要范围内收集您的终端设备实际所在位置的信息，以确定您的行踪轨迹并提供相关定位功能；若您不提供这类信息，您可能无法正常使用我们的定位功能。

### 1.2.3 其他相关信息

为了帮助您更好地使用我们的产品或服务，经您的明确授权我们可能会收集相关信息。例如，在您开启部分个性化产品或服务时，我们还会通过产品或网站的信息收集功能记录您访问中兴相关产品或服务时的一些个人信息，以为您提供该等个性化产品或服务；若您不提供这类信息，您可能无法正常使用我们的相关个性化产品或服务。

## 1.2 Data obtained when you use our products or services

### 1.2.1 Log data

Some of our products or services are only designated for specific device models (such as mobile phones of specific models) or applications. To identify abnormal account status, abnormal device status, and to learn and optimize

product adaptation, ZTE may collect related device data, software data, and service log data to provide related services.

### 1.2.2 Location data

When you use Location Based Services (LBS) (for example, use our service or product to locate family members or find your mobile phone), within the necessary scope, ZTE may collect the data of the actual location of your mobile device to track your whereabouts and provide the related function. If you do not provide such data, the function may not work properly.

### 1.2.3 Other related data

To provide better experience when using our products or services, ZTE may collect relevant personal data with your explicit consent. For example, when you enable some customized products or services, we will record some of your personal data when you access ZTE products or services through the information collection function of the products or websites. If you do not provide such data, the customized products or services may not be provided properly.

## 1.3 其他情况获取的信息

在法律允许的情况下，经您的授权，我们可能会获取您在使用第三方合作伙伴服务时所产生或分享的信息。例如，当您使用第三方（如 Facebook、Twitter、微信）账号登录中兴通讯的业务平台时，我们将从第三方处获取到您的前述身份验证信息。我们的服务器也会保管第三方平台授予的访问令牌，在您使用的各个具体产品和服务间共享，避免您反复登录第三方服务器。

**在我们的任何产品或服务中，如果我们收集敏感个人信息，我们会按照适用的法律要求进行处理，例如事先征求您的明示同意。**

### 1.3 Data obtained from third parties

To the extent permitted by law, with your prior consent, ZTE may obtain the data that you generate or share when using the services of a third-party partner. For example, when you use a third-party account (such as Facebook, Twitter, or WeChat account) to log in to a service platform of ZTE, we will obtain the above authentication data from the third party. Your access tokens provided by third parties will be saved on our servers, and such access tokens

can be shared among various services that you use to avoid logging in to third-party servers repeatedly.

**For any of our products or services, if ZTE collects sensitive personal data, the company will process the data in accordance with the applicable laws and regulations, for example, by asking your explicit consent in advance.**

## **2. 我们处理个人信息的目的和依据 Our Purposes and Legal Basis for Processing Your Personal Data**

2.1 中兴通讯为特定目的处理您的个人信息，且仅处理与实现该目的特定的相关的个人信息。根据我们与您的关系以及我们提供的产品和服务，我们可能将您的个人信息用于以下目的：

2.1 ZTE processes your personal data only for specific purposes, and only processes the personal data that is necessary for fulfilling such purposes. Based on your cooperation with ZTE, and the products and services we provide, we may process your personal data for the following purposes:

- 1) 向您提供服务；
- 2) 满足您的个性化需求；
- 3) 为您提供安全保障；
- 4) 邀请您参加关于我们服务的调查；
- 5) 为了让您有更好的用户体验改善我们的服务；
- 6) 经您同意的其他用途。

- 1) Provide services;
- 2) Meet your customized requirements;
- 3) Guarantee your safety;
- 4) Invite you to participate in the survey on our services;
- 5) Improve our services to provide better user experience;
- 6) Other purposes with your consent.

随着业务的发展，我们提供的产品和服务可能会有调整 and 变化，当我们要将您的个人信息用于不同于您事先同意的目的时，我们的产品或服务会事先征求您的同意，由您选择是否同意这种变更。

With the development of business, the products and services ZTE provides may be adjusted or changed. When we need to use your personal data for purposes other than those you consented to, we will seek your consent in advance when you use such products or services. You may decide whether to give consent to such changes.

2.2 根据相关法律法规，以下情形中，我们可能会收集和您的相关个人信息而无需征求您的授权同意：

2.2 Pursuant to relevant laws and regulations, ZTE may collect and use your personal data without obtaining prior consent in the following situations:

- 1) 为我们履行法定义务或法定职责所必需；
- 2) 为订立、履行您作为一方当事人的合同所必需；
- 3) 为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需；
- 4) 依法在合理的范围内处理您自行公开或者其他已经合法公开的个人信息；
- 5) 法律法规规定的其他情形。

1) Such collection and use are necessary for us to fulfill legal obligations or responsibilities;

2) Such collection and use are necessary for the conclusion and performance of your contract as a party;

3) To deal with public health emergencies, or, in case of emergency, to protect the health of natural persons and the safety of their property.

4) Processing of personal data that is publicly disclosed by you or other personal data that is already legally and publicly disclosed within a reasonable scope in accordance with the laws.

5) Other situations in which data processing is required by the applicable laws and regulations.



### 3. 我们如何保护和存储您的个人信息 How We Protect and Retain Your Personal Data

中兴通讯严格遵循个人信息保护“存储限制原则”、“最小化原则”和“准确性原则”。对于个人信息存储，中兴通讯采取适当的安全措施对个人信息进行安全存储。

ZTE strictly abides by the "storage limitation", "data minimization", and "accuracy" principles for personal data protection. For the retention of personal data, ZTE takes appropriate security measures to retain your personal data in a secure manner.

我们通过加强个人信息在物理、管理和技术方面的安全保障措施，比如门禁系统、监控系统、加密、匿名或假名化、员工培训等措施，努力保护您的个人信息不被未经授权地访问、使用、披露、修改、损坏或丢失及其它形式的非法处理。我们有专门的业务连续性计划，以保证我们可以连续地向我们的客户提供服务；我们的信息安全政策和程序严格按照国际标准进行设计，并会定期进行审核和更新，并通过第三方来检验我们的安全措施，以满足我们的业务需求、技术变更和监管要求。中兴通讯的中国总部及部分子公司已经通过了 ISO 27001 信息安全认证，以保证您的个人信息的安全性。中兴通讯终端产品、5G 产品、核心网产品、数字技术产品以及人力资源体系已经成功获得 ISO 27701 认证。其中，中兴通讯 5G 产品是全球首个获得 ISO 27701 认证的 5G 产品，我们可以为全球客户提供更加安全、可靠、合规的 5G 产品及方案，交付更高标准的 5G 网络。

ZTE takes appropriate physical, management, and technical measures, such as the establishment of the access control system and monitoring system, encryption, anonymization or pseudonymization, and employee training to protect your personal data against unauthorized access, use, disclosure, modification, damage, loss, or other forms of illegal processing. We have also developed a Business Continuity Plan (BCM) system to ensure business continuity. Our information security policies and procedures are designed in strict accordance with the international standards, and are reviewed and updated regularly. In addition, we invite third-parties to inspect our security measures to ensure that they meet the requirements for our business, technical changes, and supervision. ZTE headquarters in China and some of its subsidiaries have passed the ISO 27001 information security certification, and can effectively protect your personal data. ZTE terminal products, 5G

products, core network products, digital technology products and human resource system have passed the ISO 27701 certification. As the world's first 5G products that pass the ISO 27701 certification, our 5G products indicate that ZTE is capable of providing global customers with secure and reliable 5G products and solutions that comply with relevant requirements, and delivering high-quality 5G networks.

一般情况下，我们仅在为实现目的所必需的最短时间内保留您的个人信息，并在相关业务完成时，在不违反适用的法律法规情况下，及时删除您的个人信息。因为不同的场景和产品及服务不同，数据的存储期可能会有所不同。我们用于确定存留期的标准包括：

ZTE retains your personal data only for the shortest time necessary for realizing the purposes stated in this Policy, and delete your personal data in a timely manner without violating the applicable laws and regulations upon completion of the relevant business. The data retention period may vary in different scenarios, and for different products and services. ZTE uses the following standards to determine the retention period:

- 1) 所在特定领域相关法律法规的特殊要求；
- 2) 业务活动中实现数据处理目的所需的时间；
- 3) 实际开展业务需要或与数据主体之间关系的周期；
- 4) 提供的产品和服务；
- 5) 维护相应的交易及业务记录；
- 6) 为执行相关服务协议或本隐私政策；
- 7) 维护社会公共利益；以及

8) 为保护我们的客户或我们的关联公司、其他用户或雇员的人身财产安全或其他合法权益所合理必需的用途。

- 1) Special requirements of the relevant laws and regulations in a specific field;
- 2) The time required to achieve data processing purposes in business activities;

- 3) The needs to carry out business activities or the duration of the cooperation between ZTE and the data subjects;
- 4) The products and services being provided;
- 5) Maintenance of the corresponding transaction and business records;
- 6) Implementation of related service agreements or this Policy;
- 7) Safeguarding of public interests;
- 8) Guarantee of personal or property safety or other legal rights of our customers, affiliates, other users, and employees.

我们会按照适用的法律法规的规定对您的个人信息进行妥善存储，并采取适当的数据安全保障措施。

ZTE stores your personal information properly in accordance with the requirements of the applicable laws and regulations, and take proper measures to ensure the data security.

#### **4. 我们如何共享、转让、披露您的个人信息 How We Share, Transfer, and Disclose Your Personal Data**

4.1 作为跨国公司，如果业务必要，我们可能在中兴通讯内部共享您的个人信息，以便为您提供及时的服务；我们不会与中兴通讯以外的公司、组织和个人共享您的个人信息，但以下情况除外：

- 1) 为我们履行法定义务或法定职责所必需；
- 2) 为订立、履行您作为一方当事人的合同所必需；
- 3) 为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需。

4.1 As a global company, ZTE may share your personal data inside the company if it is necessary to provide services in a timely manner. We will not share your personal data with other companies, organizations or individuals, except in the following cases:

- 1) Such sharing is necessary for us to fulfill legal obligations or responsibilities;

2) Such sharing is necessary for the conclusion and performance of your contract as a party;

3) Such sharing is intended to protect the health of natural persons and the safety of their property in case of public health emergencies, or other emergencies.

4.2 我们可能会和授权业务伙伴共享最少且必要的信息，以便为您提供服务。我们会要求其严格遵守我们关于数据隐私保护的措施与要求，保障您的隐私安全，如果授权合作伙伴将您的信息用于我们未委托的用途，其将单独征得您的同意。

4.2 ZTE may also share necessary personal data with our business partners in accordance with the principle of minimization to provide the related services. We will require our business partners to strictly comply with our measures and requirements for data privacy protection to ensure your privacy security. If an authorized partner needs to use your personal data for an unauthorized purpose, it will seek your prior consent.

4.3 在涉及合并、分立、收购等情形时，如涉及到个人信息转让，我们会要求持有您个人信息的新公司、组织或个人继续受本隐私政策的约束，并及时告知您接收方的身份与联系方式。否则我们将要求该公司、组织和个人重新向您征求授权同意。

4.3 If personal data transfer is involved in a merger, acquisition, bankruptcy liquidation, asset transfer, and other similar transactions, ZTE will require the new companies, organizations, or individuals that will hold your personal data to continue complying with the requirements of this Policy, and inform you of the identity and the contact information of the recipient in a timely manner. If any new company, organization, or individual refuses to observe the requirements, we will require these companies or organizations to seek your prior consent.

对我们与之共享个人信息的公司、组织和个人，我们会与其签署严格的数据处理协议，要求他们按照我们的安全标准、本政策的要求及相关的保密和安全措施来处理个人信息。如果我们共享、转让或披露个人信息的公司、组织和个人所在的国家没有实施与您所在国家呈同等程度保护个人信息的适用法律时，比如从欧洲经济区转移到没有实施适当的个人信息保护法律的国家时，我们会按照本隐私政策的第 7 条进行处理，以保证数据转移的合法性以及保证您的个人信息的安全性。

ZTE signs strict data processing agreements with the companies, organizations, and individuals with which we share personal data, and requires them to process your personal data in accordance with our security standards, this Policy, and other relevant confidentiality and security measures. If the country where the companies, organizations, and individuals with which we share, transfer or disclose your personal data are located does not have the data protection laws that have the same level of protection as the ones in the country where you are located (for instance, your personal data is transferred from the European Economic Area to a country that has no applicable data protection law), we will handle the related issues in accordance with Article 7 of this Policy to guarantee the legitimate transfer and security of your personal data.

## 5. 您所享有的权利 Your rights

关于我们所处理的您的个人信息，您拥有多种法律权利。这些权利可能在不同的国家或地区有所区别，但主要包含以下几项：

You have various legal rights regarding the personal data ZTE processes. These rights may vary in different countries or regions, but mainly include the following:

- 1) 您有权了解您个人信息如何处理，有权访问我们所存储的您的个人信息；
- 2) 您有权在特定情况下拒绝或限制我们处理您的个人信息。提请您注意，在法律有明确规定的情况下，即使您提出拒绝或限制我们处理您的个人信息的请求，我们仍有义务继续处理您的个人信息，从而拒绝您的请求；
- 3) 您有权纠正我们所存储的关于您的不完整或不准确的信息；
- 4) 您有权查阅、复制您的个人信息；
- 5) 您有权删除您的个人信息。提请您注意，在法律要求我们保留的情况下，即使您要求我们删除您的个人信息，我们仍有义务保留相关信息；
- 6) 在某些情况下，您有权获取一些结构化、通用的、机器可读格式的个人信息，和/或要求我们将这些数据传递给技术上可行的第三方。提请您注意，此项权利仅适用于您提供给我们个人信息；

7) 如果您对我们所进行的个人信息处理活动及本隐私政策有任何异议，您有权向有关监管机构投诉。

- 1) Know how ZTE processes your personal data and accesses the personal data we store;
- 2) Object to or restrict our processing of your personal data in special cases. Even if you object to or restrict our processing of your personal data, ZTE is still obliged to continue processing your personal data and reject your request where it is explicitly required under the applicable laws and regulations;
- 3) Correct the incomplete or inaccurate personal data about you that ZTE stores;
- 4) Query or copy your personal data;
- 5) Delete your personal data. Please note that where it is required by laws, ZTE is obliged to retain your personal data even if you require us to delete it;
- 6) In some cases, obtain your personal data in a structured, generic, machine-readable format and/or require us to transfer the data to a technically feasible third party. This right is only applicable to the personal data you provide.
- 7) Lodge complaints to the related regulators if there is any objection to our personal data processing activities or this Policy.

您行使权利的方式会根据您使用的具体产品或服务有所区别。另外，您可以通过点击[数据主体权利联系入口](#)直接与公司数据保护合规部联系，我们会确保您行权过程中的个人信息安全。

The way in which you exercise rights depends on the specific product or service you use. In addition, you may contact the Data Protection Compliance Dept. directly by visiting the [Data subject rights response](#) notice page. ZTE will ensure the security of your personal data when you exercise the rights.

在您要求以上权利时，我们可能需要您提供书面的请求并核实您的身份以保证个人信息的安全性。一般情况下，我们将不收取您的任何费用，除非这种请求

超出了常规的要求。如果您在行使您的权利时有任何疑问，可以按照本隐私政策第 10 条联系我们。

When you request the exercise of the above rights, ZTE may need you to file a written request and verify your identity to ensure the security of your personal data. We do not charge for requests, except for extra requirements. For any questions about accessing and managing personal data, please contact us through the channels provided in Article 10 of this Policy.

## 6. 我们如何使用 Cookies 和类似技术 **How We Use Cookies and Similar Technologies**

我们的网页和特定产品或服务会使用 Cookies、网站信标和像素标签等同类技术，以便为您提供良好的体验，并允许我们改进我们的产品或服务。关于我们使用 Cookies 和同类技术的信息，我们的网页和特定产品有单独制定的 Cookies 政策。若您希望了解更多 Cookie 的安全性等信息，请参见 [Cookies 政策](#)。

Our web pages and specific products or services use cookies, website beacons, and other similar technologies to provide better experience and to improve our products or services. Separate cookie policies are formulated for our websites and specific products. If you want to learn more about information such as security of cookies, please refer to the [Cookies Policy](#).

## 7. 您的个人信息如何跨境转移 **Cross-Border Transfer of Your Personal Data**

中兴通讯是一家全球化的跨国公司，一般情况下，我们将在您使用产品或服务的所在国家/地区处理您的个人信息，但也可能将您的个人信息转移到收集这些信息之外的国家/地区，这些国家/地区的个人信息保护法可能不同。

无论在哪里处理这些个人信息，我们将采取一切合理必要的措施保证您的数据安全，依法及时告知您传输的目的地、接受者等信息，并采取措施落实适用的法律法规的要求，比如事先获得您的同意或与接收方签订必要的数据转移合同。

ZTE is a global company. We usually process your personal data in the country or region where we provide you with our products or services. However, we may also transfer your personal data to other countries or regions that have different laws on the protection of personal data.

Wherever ZTE may transfer your personal data, we will, pursuant to applicable laws, take every reasonable and necessary measure to ensure your data security, inform you of the destination, recipient, and other related information in a timely manner, and take appropriate measures to comply with this Policy and applicable local laws. For instance, to transfer your personal data, we will seek prior consent or sign a necessary data transfer contract with the receiver.

## 8. 我们如何保护儿童的个人信息 **How We Protect Children's Personal Data**

我们非常重视对未成年人个人信息的保护。根据相关法律法规的规定，若您 是 18 周岁以下的未成年人，在使用我们的服务或产品前，应事先取得您的家长或法定监护人的同意；若您 是 14 周岁以下的儿童，在使用相关的产品或服务前，应当按照注册、使用流程，事先取得您的家长或法定监护人的同意，并由您的家长或法定监护人帮助您完成产品或服务注册流程，以便您能使用我们提供的产品或服务。

对于未年满 14 周岁的儿童，未经儿童的父母或监护人的同意，中兴通讯不会有意向儿童收集个人信息。对于经父母或监护人同意而收集的儿童个人信息，我们只会在符合当地法律要求，且在其父母或监护人明确同意的情况下，收集和使用相关数据。如果中兴通讯发现了未事先获得同意而收集的儿童个人信息，我们将尽快删除这些信息。

ZTE attaches great importance to the protection of minors' personal data. In accordance with relevant laws and regulations, if you are a minor under the age of 18, you shall obtain the consent of your parents or legal guardians before using our services or products. If you are a child under the age of 14, you shall obtain the consent of your parents or legal guardians before using related products or services, and complete the product or service registration process under the help of your parents or legal guardians, so that you may use the products or services provided by ZTE.

ZTE will not collect personal data from children under the age of 14 without the prior consent of their parents or guardians. If children's personal data is collected with the prior consent of their parents or guardians, we will



only use or disclose such data as permitted by laws, and with the explicit consent of the children's parents or guardians. If we accidentally collect a child's personal data without the prior consent from the child's parents or guardians, the data will be deleted as soon as possible.

## 9. 本隐私政策如何更新 Updates to This Policy

随着可适用法律法规的逐步完善以及业务的不断调整,我们可能会不定时更新本隐私政策。如果本隐私政策发生修订,我们会及时在官网显著位置发布最新版本,对于重大变更,我们还会提供更为显著的通知。特定产品和服务的隐私政策有关个人信息的处理目的、处理方式和处理的个人信息种类发生变更的,会重新取得您的同意。

With the gradual improvement of applicable laws and regulations and the continuous adjustment of business, ZTE may update this Policy from time to time. If this Policy is revised, we will release the latest version in a timely manner, and publish it in a noticeable place on our official website. For major changes, we will also provide more noticeable notifications. For any changes to the purposes, methods, and types of personal data to be processed for specific products and services, we will seek your consent again prior to processing your data.

本隐私政策所指的重大变更包括但不限于:

Major changes mentioned in this Policy include but are not limited to the following situations:

- 1) 我们的服务模式发生重大变化,如处理的个人信息的目的、信息类型、使用方式等发生重大变化;
- 2) 我们在所有权结构、组织架构等方面发生重大变化,如业务调整、破产并购等引起的所有者变更等;
- 3) 个人信息共享、转让或公开披露的主要对象发生变化;
- 4) 您参与个人信息处理方面的权利及其行使方式发生重大变化;
- 5) 我们负责处理个人信息安全的责任部门、联络方式及投诉渠道发生变化;

6) 个人信息安全影响评估报告表明存在高风险时。

- 1) Major changes take place in our service model, such as in the purpose of processing personal data, the type of processed personal data, and the mode of using personal data;
- 2) Major changes take place in ownership structure and organizational structure, such as in owners caused by business adjustment, bankruptcy, or mergers and acquisitions;
- 3) Changes take place in the major parties with which personal data is shared, and to which personal data is transferred or disclosed;
- 4) Changes take place in your rights to participate in processing personal data and the way you exercise rights;
- 5) Changes take place in our department responsible for personal data security, our contacts, or the channel to lodge a complaint;
- 6) A major risk is indicated in the data security impact assessment report.

## 10. 如何联系我们 **Contact Us**

如果您对本隐私政策有任何意见、建议或疑问，或者有有关您的个人信息请求与咨询，您可以通过发送邮件至 [Privacy@zte.com.cn](mailto:Privacy@zte.com.cn) 或以下方式和我们联系：中兴通讯股份有限公司数据保护合规部，地址：深圳市南山区科技南路 55 号，邮编：518057。

如您处于欧洲经济区，您也可以按如下方式联系我们欧洲经济区的数据保护官 Marco Costantini：电话：+39 3701296535，E-mail: [marco.costantini@zte.com.cn](mailto:marco.costantini@zte.com.cn)，对于您的任何请求或咨询，我们将在 30 天内答复。

If you have any questions about this Policy, or have any requests or inquiries about your personal data, contact us at [privacy@zte.com.cn](mailto:privacy@zte.com.cn) or mail us through the following address: Data Protection Compliance Dept. of ZTE Corporation, No. 55, Hi-Tech Road South, Shenzhen, P.R. China (postcode: 518057).

If you are in the European Economic Area (EEA), contact our Data Protection Officer Marco Costantini either by calling +39 3701296535 or by

sending an email to [marco.costantini@zte.com.cn](mailto:marco.costantini@zte.com.cn). We will respond to your request or inquiry within 30 days.