

NANJING INTERNATIONAL SCHOOL PRIVACY STATEMENT

1. GENERAL STATEMENT

Nanjing International School ("NIS," "we" or "our") respects your privacy and we are committed to protecting it. This Privacy Statement explains our policies and practices regarding the information we collect from and about you. It is through this Privacy Statement that we intend to provide you with a level of comfort and confidence in how we collect, use, and safeguard personal and other information we collect and obtain, or that you provide through this website, and how you can contact us if you have any questions or concerns. It is our sincere hope that by explaining our data handling practices we will develop a trusting and long-lasting relationship with you. By using this website, you agree to the terms of this Privacy Statement.

2. INFORMATION ABOUT NIS AND THIS WEBSITE

This Privacy Statement applies to the website located at www.nischina.org, its related mobile website, and its applications (collectively, "Site"), which are owned and operated by Nanjing International School. NIS also manages certain micro-sites which may be administered by a third-party on our behalf, such as *share.nanjing-school.com*.

The purpose of the Site is to provide visitors with: (1) knowledge of NIS and the educational experience offered; (2) the option to apply for entrance into our educational programme; (3) the option to apply for employment at our school; and (4) the ability to update your contact information and communication preferences as an alumnus/alumna.

NIS makes every effort to ensure that information available through and functionality of the Site is consistent and accessible across all devices, however certain features that are available on the Site may not be available on the related mobile site, and vice versa.

INFORMATION WE COLLECT FROM AND ABOUT YOU

Information You Provide to NIS

For purposes of this Privacy Statement, "personally identifiable information" is information that identifies you as an individual, for example, your name, street address, phone number, or e-mail address.

Certain pages of this Site may allow you to fill in this information in order for us to collect information about our alumni families or connect you to a third-

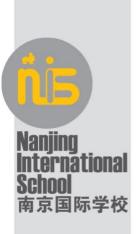


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party data processor to collect information for the purposes of applying to our school (for employment or enrolment). These will, in turn, ask for permission to collect, process and retain your data on our behalf.

Information NIS May Collect Automatically

This Site and its service providers may collect "non-personally identifiable information" from you. "Non-personally identifiable information" is information that does not identify you on an individual basis, but rather is collected and maintained on an aggregate or anonymous basis that includes all Site visitors. Non-personally identifiable information may include Site activity information that tracks the Site pages that are visited, the amount of time spent on our Site, clicks, mouse movements, scrolls, page views, events (which online features you interacted with), and anonymous information such as the zip codes where our visitors live. It also may include aggregate data provided by a third-party that surveys Site visitors on our behalf.

Tools We Use to Collect Non-Personally Identifiable Information

A "cookie" is a small text file that helps us to make your visit to our Site more enjoyable and meaningful to you. For example, cookies avoid you having to log in every time you come back to one of our websites. They also allow us to tailor a website or advertisement to better match your interests and preferences. There are a couple different types of cookies:

- A "session" cookie is stored only in your computer's working memory (RAM) and only lasts for your browsing session. When you close all your browser's windows, or when you shut down your computer, the session cookie disappears forever.
- A "persistent" cookie is stored on your computer's hard drive until a specified date, which could be tomorrow, next week, or 10 years from now. Persistent cookies stay on your computer until either a) they expire, b) they are overwritten with newer cookies, or c) you manually remove them.

Most browsers can be configured not to accept cookies, however, this may prevent you from having access to some Site functions or features.

This Site may use conversion pixels and tags which are site instrumentation tools that help us to determine, for instance, whether a page has been viewed or not and, if so, how many times. Emails or electronic newsletters we send may use tools (e.g., pixel tags or web beacons) to gather email metrics and information to improve the reader's experience such as how many of the emails are opened, if they were printed or forwarded, the type of device (e.g., mobile or PC) from which they were opened, and the city, state, and county associated with the applicable IP address. In general, any electronic image viewed as part of a webpage, including an ad banner, can act as a web beacon.



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This Site may generate a "session log" when you visit. We use session logs to help us determine how people travel through our Site. In this way, we can structure our pages so that the information most frequently visited is easier to find. By tracking page visits, we can also determine if the information we're providing is being used. The only data gathered is the Internet Protocol (IP) address from which you came (which contains no personal information), the website that referred you, the pages you visited and the date and time of those visits.

This Site may provide you with the opportunity to integrate with third-party social media sites, and this site may track on an aggregate level the number of items "Liked" on this site, or items on this site that you choose to share with a third-party social media site.

If you visit a related mobile site or app, or are directed to this site via a QR Code that you scanned, we collect additional non-personally identifiable information that may include the mobile device's service provider and operating system. We may also collect a unique device identifier assigned to your mobile device, geolocation data (including your precise location), or other transactional information for that device. If your mobile phone has the capability and the GPS feature on the mobile phone is turned on, you can utilize certain locator functionalities on the Site that may utilize your GPS data to determine your location in order to fulfill your request.

Users may be directed to this Site via banner ads, site links or QR Codes. Ads, site links or QR Codes may use tools such as cookies or web beacons to deliver metrics on the effectiveness of the ads or links. They do not collect personally identifiable information from the user.

Service Provider and Partner Collection of Information on the Site
This Site may use third party service providers to activate and/or deliver a
service, or deliver Site functionality such as fulfilling your request to purchase
a product or service, including items from our online store. In performing this
function the third party may place a persistent cookie on your computer or
have to gather personal information from you in order to activate and deliver
the service, or facilitate the processing of your purchase.

This Site may use a third-party click tracking analytics tool (such as Google Analytics and the Salesforce Marketing Cloud) to capture clickthrough statistics.

3. HOW NIS USES YOUR INFORMATION

NIS may use the personally identifiable and non-personally identifiable information collected from and about you to:

- Fulfill Site user requests (e.g., create log in credentials, send application or promotional materials including e-mails, change newsletter preferences, etc.)
- Create an online directory of Nanjing International School alumni



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- Respond to your comments or requests for information
- Contact you about promotional offers, marketing programs, or communications from NIS
- Track, measure and analyze your use of and activity relating to the Site, and your engagement with NIS in order to enhance NIS's and relationships with you
- Fulfill a request for or to develop new products or services
- Generate analytics that improve our Site layout, content, and services
- Make inferences and predictions about your potential areas of interest
- · Comply with legal requirements
- Compile aggregate and statistical data to help in website design and to identify popular features
- Measure site activity to allow us to update our Site to better meet user wants and needs

4. SHARING YOUR PERSONALLY IDENTIFIABLE INFORMATION

Site data is the property of Nanjing International School, which has final authority over decisions about the sharing of information.

NIS does not share, sell, or rent personally identifiable information with unaffiliated entities for their own use without providing you a choice.

Personally identifiable information that you provide to us in the course of using Site features or requesting a product or service through this Site may be stored in one or more of our databases. We may share personally identifiable information that we collect about you with other entities within Nanjing International School.

Service providers, contractors or subcontractors that have access to your personally identifiable information in connection with providing services for this Site are required to keep your information confidential and are not permitted to use this information for any other purpose than to fulfill the services they are performing for NIS or this Site.

NIS will disclose your personally identifiable information, without notice, only if has a good faith belief that such use or disclosure is necessary in order to: (i) protect, enforce, or defend the legal rights, privacy, safety, or property of NIS, our affiliates or their employees, agents and contractors (including enforcement of our agreements and our terms of use); (ii) protect the safety, privacy, and security of users of the Site or members of the public; (iii) protect against fraud or for risk management purposes; (iv) comply with the law or legal process; or (v) respond to requests from public and government authorities.



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5. ACCESS TO AND CONTROL OVER YOUR PERSONALLY IDENTIFIABLE INFORMATION

To correct, update or delete your personally identifiable information maintained by NIS you may contact us through any of the options listed in Section 10 below. Please supply your name and address and specify what information you would like to correct, update or suppress so that we may be able to process your request. We will try to comply with your request as soon as reasonably practicable.

The scope of access available for this request is for information stored in the database that holds the data for this Site. Any personally identifiable information that has been collected from you on other Nanjing International School websites and services will not be accessible or changeable through the processing of this request.

6. SECURITY OF YOUR INFORMATION

Safeguarding information of visitors to our Site is important to us. We use reasonable administrative, technical, personnel and physical steps to maintain accuracy of information and to protect information from loss, unauthorized use or alteration.

7. CONSENT TO PROCESSING

This Site is hosted in and managed from the People's Republic of China. By visiting this site and by providing your personally identifiable information to us, you understand and consent to the collection, use, processing, transfer, and disclosure of your personally identifiable and non-personally identifiable information globally — including to the People's Republic of China – in accordance with this Privacy Statement. Therefore, by visiting this site and by providing such information, you consent to the transfer of such information across country borders, and to the use, processing, and disclosure of such information in global locations. Your consent shall be deemed to include your consent to transfer of the personally identifiable or non-personally identifiable information to locations that may have different levels of privacy protection than in your own country.

8. LINKS TO OTHER SITES

This Site provides links to other websites. We encourage you to review the privacy statements of all sites which you visit, including those whose links are provided on this Site, so that you can understand how those sites collect, use and share your information. This Site is not responsible for the privacy statements, content or data handling practices on other websites.



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If you use available mapping functionality on this website, you agree to be bound by the mapping service's terms and conditions/privacy policy. For example, if you use the Google Street View or Mapping functionality of NIS's websites, you agree to be bound by <u>Google's Terms of Use and Google's Privacy Policy.</u> In addition, if you are on an associated mobile site and the GPS feature on the mobile phone is turned on (if it has such capability), the GPS data may be utilized by the mapping service to determine your location in order to fulfill your request for location services.

9. CONTACTING US

If you have any questions, comments or concerns about this Privacy Statement, this Site's privacy practices, or have any questions regarding the contents of this Site please contact us at:

Mail address:

Nanjing International School

Xue Heng Lu 8

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Qi Xia District, Nanjing P.R. China 210046

Telephone: +86 25 8589 9111

E-mail: <u>it-help@nanjing-school.com</u> (Put "GDPR" in subject heading)

We are committed to working with you to obtain a fair and rapid resolution of any complaints or disputes about privacy and the handling of your data. We will be happy to respond to your questions and comments.

10. REVISIONS TO THIS PRIVACY STATEMENT

Occasionally we may update this Privacy Statement in order to reflect any changes to the Site or our privacy practices. If we make any updates, the new Privacy Statement will be posted to the website ten (10) days prior to the changes taking effect.

The effective date of this Privacy Statement is 25 May 2018.



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