

泰格医药全球隐私政策

Tigermmed Global Privacy Policy

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1. 引言 / Introduction

泰格医药（以下简称“泰格”、“我们”或“本公司”）深知个人信息的敏感性，并致力于保护个人的基本权利与自由，特别是个人信息受保护的权利。作为一家全球领先的合同研究组织（CRO），泰格在为制药、生物技术及医疗器械企业提供临床研究服务的过程中，可能处理各类个人的个人信息。

Tigermmed (hereinafter referred to as "Tigermmed," "we," "us," or "our") understands the sensitivity of personal information and is committed to protecting the fundamental rights and freedoms of individuals, notably the right to protection of personal information. As a leading global contract research organization (CRO), Tigermmed may process personal information of various individuals in the course of providing clinical research services to pharmaceutical, biotechnology, and medical device companies.

本全球隐私政策（以下简称“本政策”）阐述了泰格在全球范围内收集、使用、存储、共享和保护个人信息的原则与实践。本政策旨在向数据主体透明地说明我们如何处理其个人信息，以及数据主体可行使的权利。

This Global Privacy Policy (hereinafter referred to as the "Policy") sets out the principles and practices by which Tigermmed collects, uses, stores, shares, and protects personal information on a global scale. The Policy aims to provide data subjects with

transparent information about how we process their personal information and the rights they may exercise.

泰格致力于遵守其运营所在司法管辖区的适用数据保护法律法规，包括但不限于《中华人民共和国个人信息保护法》(PIPL)、《欧盟通用数据保护条例》(GDPR)、《英国通用数据保护条例》(UK GDPR)、美国《健康保险流通与责任法案》(HIPAA) 以及其他适用的当地法律。

Tigermed is committed to complying with applicable data protection laws and regulations in the jurisdictions where it operates, including but not limited to the Personal Information Protection Law of the People's Republic of China (PIPL), the EU General Data Protection Regulation (GDPR), the UK General Data Protection Regulation (UK GDPR), the U.S. Health Insurance Portability and Accountability Act (HIPAA), and other applicable local laws.

2. 适用范围 / Scope

本政策适用于泰格及其全球子公司和关联实体在业务运营中以电子或纸质形式处理的所有个人信息。本政策涵盖的个人信息可能涉及以下类别的个人：

This Policy applies to all personal information processed in electronic or paper form by Tigermed and its global subsidiaries and affiliated entities in the course of business operations. Personal information covered by this Policy may relate to the following categories of individuals:

- 临床试验参与者、患者及其家属、护理人员 / Clinical trial participants, patients and their family members, caregivers
- 研究者、研究中心工作人员及其他医疗保健专业人员 / Investigators, site staff, and other healthcare professionals
- 泰格员工、实习生、求职者及退休人员 / Tigermed employees, interns, job applicants, and retirees
- 客户、申办方及业务合作伙伴的联系人 / Contacts of clients, sponsors, and business partners

- 供应商、销售商及服务提供商的联系人 / **Contacts of suppliers, vendors, and service providers**
- 投资者、股东及公司治理相关人员 / **Investors, shareholders, and individuals related to corporate governance**
- 通过泰格网站、在线平台或社交媒体与我们互动的个人 / **Individuals who interact with us through Tigermed websites, online platforms, or social media**
- 自发报告不良事件或安全信息的个人 / **Individuals who spontaneously report adverse events or safety information**

本政策适用于泰格全体员工、管理人员、实习生以及代表泰格处理个人信息的授权第三方人员。

This Policy applies to all Tigermed employees, management personnel, interns, and authorized third-party personnel who process personal information on behalf of Tigermed.

在泰格作为客户或申办方的服务提供商（如 **CRO**）处理个人信息的情况下，客户或申办方通常负责向数据主体提供适当的隐私通知并在适用时获取必要的同意。泰格将按照客户的指示及双方合同约定处理个人信息。

Where Tigermed processes personal information as a service provider (e.g., CRO) for a client or sponsor, the client or sponsor is generally responsible for providing appropriate privacy notices to data subjects and obtaining any necessary consent where applicable. Tigermed will process personal information in accordance with the client's instructions and the contractual agreement between the parties.

3. 定义 / Definitions

在本政策中，下列术语具有如下含义：

In this Policy, the following terms shall have the meanings set forth below:

3.1 个人信息 / Personal Information

个人信息是指与已识别或可识别的自然人有关的任何信息或信息组合。可识别的自然人是指能够直接或间接（特别是通过与身份证号、定位数据、在线标识符等识别因素相结合）被识别的个人。

个人信息包括但不限于姓名、家庭住址、电话号码、电子邮件地址、身份证号、护照号、社会保障号、就业信息、财务信息以及健康信息。

Personal information means any information or set of information relating to an identified or identifiable natural person. 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 that person. Personal information includes but is not limited to names, home addresses, telephone numbers, email addresses, national identification numbers, passport numbers, social security numbers, employment information, financial information, and health information.

经过匿名化处理、无法识别特定自然人且不能复原的信息不属于个人信息。经过假名化处理的信息（如临床试验中的密钥编码数据）在仍可通过密钥重新识别个人的情况下，仍属于个人信息。

Information that has been anonymized such that it no longer relates to an identifiable natural person and cannot be re-identified is not personal information. Pseudonymized information (such as key-coded data in clinical trials) remains personal information where the individual can still be re-identified through the key.

3.2 敏感个人信息 / Sensitive Personal Information

敏感个人信息是指一旦泄露或非法使用，容易导致自然人的人格尊严受到侵害或者人身、财产安全受到危害的个人信息。泰格处理的敏感个人信息可能包括：

Sensitive personal information refers to personal information that, if leaked or unlawfully used, could easily result in infringement of an individual's personal dignity or harm to their personal or property safety. Sensitive personal information processed

by Tigermed may include:

- 健康数据、医疗记录、遗传数据及生物识别数据 / Health data, medical records, genetic data, and biometric data
- 临床试验参与者的受保护健康信息 (PHI) / Protected health information (PHI) of clinical trial participants
- 政府签发的身份证件号码 (身份证号、护照号、驾照号、社会保障号等) / Government-issued identification numbers (national ID, passport, driver's license, social security number, etc.)
- 金融账户信息 (银行账号、信用卡号等) / Financial account information (bank account numbers, credit card numbers, etc.)
- 揭示种族、民族、政治观点、宗教或哲学信仰、工会成员身份的信息 / Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership
- 与性生活或性取向有关的信息 / Information concerning an individual's sex life or sexual orientation
- 与犯罪行为有关的信息 / Information relating to criminal offenses
- 精确地理位置数据 / Precise geolocation data
- 不满十四周岁未成年人的个人信息 / Personal information of minors under the age of 14
- 适用数据保护法规定为敏感数据的其他类别信息 / Other categories of information defined as sensitive data under applicable data protection laws

3.3 处理 / Processing

处理是指对个人信息或个人信息集合进行的任何操作或一系列操作，无论是否通过自动化手段，包括收集、记录、组织、构建、存储、改编或更改、检索、查阅、使用、通过传输披露、传播或以其他方式提供、对齐或组合、限制、删除或销毁。

Processing means any operation or set of operations performed on personal information or sets of personal information, 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.

3.4 数据主体 / Data Subject

数据主体是指其个人信息被泰格处理的已识别或可识别的自然人。

Data subject means an identified or identifiable natural person whose personal information is processed by Tigermed.

3.5 数据控制者与数据处理者 / Controller and Processor

数据控制者是指单独或与他人共同决定个人信息处理目的和方式的自然人或法人、公共机构、代理机构或其他机构。数据处理者是指代表数据控制者处理个人信息的自然人或法人、公共机构、代理机构或其他机构。

Controller means 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 information. Processor means a natural or legal person, public authority, agency, or other body which processes personal information on behalf of the controller.

在不同业务场景下，泰格可能以数据控制者或数据处理者的身份处理个人信息。在泰格作为 CRO 为申办方提供服务时，泰格通常以数据处理者身份行事；在处理员工个人信息、业务联系人信息等场景下，泰格通常以数据控制者身份行事。

In different business scenarios, Tigermed may process personal information as a controller or a processor. When Tigermed provides services as a CRO for a sponsor, Tigermed typically acts as a processor; in scenarios such as processing employee personal information or business contact information, Tigermed typically acts as a controller.

3.6 密钥编码临床试验数据 / Key-Coded Clinical Trial Data

在临床试验中，泰格通常接收和处理密钥编码的临床试验参与者个人信息。此类信息由研究者使用特定代码进行假名化处理，仅研究者持有密钥代码（参与者识别码清单）。密钥编码数据连同不包含参与者姓名的临床研究信息将被传输至申办方和 CRO。尽管经过密钥编码，此类数据在仍可通过密钥重新识别个人的情况下仍属于个人信息。

In clinical trials, Tigermed typically receives and processes key-coded personal information of clinical trial participants. Such information is pseudonymized by the investigator using a specific code, and only the investigator holds the key code (subject identification code list). The key-coded data, together with clinical research information that does not identify participants by name, is transmitted to the sponsor and CRO. Despite being key-coded, such data remains personal information where the individual can still be re-identified through the key.

4. 我们处理的个人信息类别 / Categories of Personal Information We Process

泰格可能根据业务需要处理以下类别的个人信息：

Tigermed may process the following categories of personal information depending on business needs:

4.1 身份与联系信息 / Identity and Contact Information

姓名、头衔、家庭住址、工作地址、电话号码、手机号码、电子邮件地址、传真号码、公司名称及职位。

Name, title, home address, work address, telephone number, mobile number, email address, fax number, company name, and job title.

4.2 身份识别信息 / Identification Information

身份证号、护照号、社会保障号、纳税人识别号、员工编号、照片及其他政府签发的身份证件信

息。

National identification number, passport number, social security number, tax identification number, employee ID, photograph, and other government-issued identification document information.

4.3 健康与医疗信息 / Health and Medical Information

病史、诊断信息、治疗记录、用药信息、体格检查结果、实验室检查结果、医学影像、遗传数据、生命体征、不良事件信息以及临床试验中收集的健康数据。

Medical history, diagnostic information, treatment records, medication information, physical examination results, laboratory test results, medical imaging, genetic data, vital signs, adverse event information, and health data collected in clinical trials.

4.4 临床试验相关信息 / Clinical Trial-Related Information

参与者识别码、入组信息、随机化信息、研究中心信息、研究者信息、知情同意书签署记录、病例报告表（CRF）数据、电子数据采集（EDC）系统数据、研究药物分配信息以及研究合规相关信息。

Subject identification codes, enrollment information, randomization information, study site information, investigator information, informed consent form signing records, Case Report Form (CRF) data, Electronic Data Capture (EDC) system data, study drug dispensing information, and study compliance-related information.

4.5 人力资源信息 / Human Resources Information

简历、申请材料、学历与资格证明、雇佣合同、薪酬与福利信息、绩效评估、培训记录、考勤记录、税务信息、银行账户信息、紧急联系人信息、退休信息以及离职相关信息。

Resumes, application materials, education and qualification certificates, employment contracts, compensation and benefits information, performance evaluations, training records, attendance records, tax information, bank account information, emergency

contact information, retirement information, and termination-related information.

4.6 财务与交易信息 / Financial and Transaction Information

银行账户信息、信用卡信息、发票信息、付款记录、报销信息以及与商业合同履行相关的财务信息。

Bank account information, credit card information, invoice information, payment records, reimbursement information, and financial information related to the performance of commercial contracts.

4.7 业务与通信信息 / Business and Communication Information

与客户、供应商、业务伙伴的通信记录、会议记录、电子邮件、电话记录、客户服务记录、营销互动记录以及合同谈判与履行相关信息。

Communication records with clients, suppliers, and business partners, meeting minutes, emails, telephone records, customer service records, marketing interaction records, and information related to contract negotiation and performance.

4.8 在线与技术信息 / Online and Technical Information

IP 地址、Cookie 标识符、设备标识符、浏览器类型、操作系统、访问时间、浏览记录、点击流数据、应用使用数据以及通过泰格网站和在线平台收集的其他技术信息。

IP address, cookie identifiers, device identifiers, browser type, operating system, access time, browsing history, clickstream data, application usage data, and other technical information collected through Tigermed websites and online platforms.

4.9 投资者与公司治理信息 / Investor and Corporate Governance Information

股东信息、投资者联系方式、投资者沟通记录、董事及高管信息、公司治理相关个人信息。

Shareholder information, investor contact information, investor communication records, director and officer information, and personal information related to

corporate governance.

5. 处理目的与法律依据 / Purposes and Legal Bases for Processing

泰格仅为实现明确、合理且预先确定的目的处理个人信息。以下阐述了泰格处理个人信息的主要目的及相应的法律依据：

Tigermed processes personal information only for specified, explicit, and legitimate purposes predetermined in advance. The following describes the main purposes for which Tigermed processes personal information and the corresponding legal bases:

5.1 临床试验与医学研究服务 / Clinical Trials and Medical Research Services

作为 CRO，泰格的核心业务是为制药、生物技术和医疗器械企业提供临床试验及相关研究服务。在此过程中，泰格可能处理临床试验参与者、研究者、研究中心工作人员及其他相关人员的个人信息，用于：

As a CRO, Tigermed's core business is providing clinical trial and related research services to pharmaceutical, biotechnology, and medical device companies. In this process, Tigermed may process personal information of clinical trial participants, investigators, site staff, and other related individuals for the purpose of:

- 临床试验的启动、管理、监查和关闭 / Clinical trial start-up, management, monitoring, and close-out
- 临床数据的收集、录入、清理、管理和分析 / Collection, entry, cleaning, management, and analysis of clinical data
- 药物警戒与安全性报告 / Pharmacovigilance and safety reporting
- 医学编码与数据标准化 / Medical coding and data standardization
- 统计分析与研究报告撰写 / Statistical analysis and study report writing
- 法规申报与注册支持 / Regulatory submission and registration support
- 质量保证与稽查 / Quality assurance and auditing
- 真实世界研究与观察性研究 / Real-world research and observational studies

- 参与者招募与患者支持项目 / Participant recruitment and patient support programs

在此类场景下，泰格通常作为数据处理者代表申办方处理个人信息。处理的法律依据通常包括：为履行合同所必需、遵守法定义务（如 GCP 要求）、公共卫生领域的公共利益、以及数据主体的同意。

In such scenarios, Tigermed typically acts as a processor processing personal information on behalf of the sponsor. The legal bases for processing typically include: necessity for the performance of a contract, compliance with legal obligations (such as GCP requirements), public interest in the area of public health, and the data subject's consent.

泰格承诺在临床试验中严格保护参与者隐私。临床试验参与者的个人信息通常以密钥编码形式处理，仅在必要范围内访问，并采取严格的保密和安全措施。

Tigermed is committed to strictly protecting participant privacy in clinical trials. Personal information of clinical trial participants is typically processed in key-coded form, accessed only to the extent necessary, and subject to strict confidentiality and security measures.

5.2 人力资源管理 / Human Resources Management

泰格处理员工、实习生、求职者及退休人员的个人信息，用于人力资源管理的全生命周期，包括但不限于：

Tigermed processes personal information of employees, interns, job applicants, and retirees for the full lifecycle of human resources management, including but not limited to:

- 招聘与选拔 / Recruitment and selection
- 入职与劳动合同管理 / Onboarding and employment contract management
- 薪酬、奖金、福利与股权激励管理 / Compensation, bonus, benefits, and equity

incentive management

- 绩效评估与职业发展 / Performance evaluation and career development
- 培训与能力发展 / Training and competency development
- 考勤、休假与差旅管理 / Attendance, leave, and travel management
- 员工关系与纪律管理 / Employee relations and disciplinary management
- 税务与社会保障管理 / Tax and social security management
- IT 系统访问与身份管理 / IT system access and identity management
- 退休与离职管理 / Retirement and termination management
- 紧急联系与员工安全 / Emergency contact and employee safety

此类处理的法律依据通常包括：履行劳动合同所必需、遵守法定义务（如劳动法、税法、社会保障法）、泰格的合法利益（如有效的人力资源管理）以及数据主体的同意（在适用情况下）。

The legal bases for such processing typically include: necessity for the performance of an employment contract, compliance with legal obligations (such as labor law, tax law, social security law), Tigermed's legitimate interests (such as effective human resources management), and the data subject's consent (where applicable).

5.3 客户与业务关系管理 / Client and Business Relationship Management

泰格处理客户、申办方及潜在客户的联系人个人信息，用于：

Tigermed processes personal information of contacts of clients, sponsors, and potential clients for the purpose of:

- 建立和维护客户关系 / Establishing and maintaining client relationships
- 商务洽谈、合同谈判与签署 / Business discussions, contract negotiation, and signing
- 项目交付与客户服务 / Project delivery and client services
- 客户沟通与关系维护 / Client communication and relationship maintenance
- 客户满意度调查与服务质量改进 / Client satisfaction surveys and service quality improvement

- 营销推广与业务发展（在适用法律允许的范围内） / **Marketing and business development (to the extent permitted by applicable law)**

此类处理的法律依据通常包括：履行合同所必需、泰格的合法利益（如发展和维护业务关系）以及数据主体的同意（在适用情况下，特别是营销活动）。

The legal bases for such processing typically include: necessity for the performance of a contract, Tigermed's legitimate interests (such as developing and maintaining business relationships), and the data subject's consent (where applicable, particularly for marketing activities).

5.4 医疗保健专业人员互动 / Healthcare Professional Engagement

泰格可能直接从医疗保健专业人员（HCP）、官方渠道和业务合作伙伴处收集有关 HCP 的信息，用于：

Tigermed may collect information about healthcare professionals (HCPs) directly from HCPs, official channels, and business partners for the purpose of:

- 研究者选择与管理 / **Investigator selection and management**
- 临床试验中心启动与管理 / **Clinical trial site initiation and management**
- 医学事务与科学交流 / **Medical affairs and scientific exchange**
- 真实世界研究与健康结果分析 / **Real-world research and health outcomes analysis**
- 市场调研与学术活动 / **Market research and academic events**
- 药物警戒与安全性信息处理 / **Pharmacovigilance and safety information processing**

此类处理的法律依据通常包括：履行合同所必需、遵守法定义务、公共卫生领域的公共利益以及泰格的合法利益。

The legal bases for such processing typically include: necessity for the performance of a contract, compliance with legal obligations, public interest in the area of public

health, and Tigermed's legitimate interests.

5.5 供应商与合作伙伴管理 / Supplier and Business Partner Management

泰格处理供应商、销售商、服务提供商及其他业务合作伙伴的联系人个人信息，用于：

Tigermed processes personal information of contacts of suppliers, vendors, service providers, and other business partners for the purpose of:

- 供应商评估与选择 / Supplier evaluation and selection
- 合同谈判与签署 / Contract negotiation and signing
- 采购订单与付款处理 / Purchase orders and payment processing
- 供应商绩效管理 / Supplier performance management
- 服务交付协调与质量控制 / Service delivery coordination and quality control
- 合规审查与尽职调查 / Compliance review and due diligence

此类处理的法律依据通常包括：履行合同所必需、遵守法定义务以及泰格的合法利益。

The legal bases for such processing typically include: necessity for the performance of a contract, compliance with legal obligations, and Tigermed's legitimate interests.

5.6 投资者关系与公司治理 / Investor Relations and Corporate Governance

泰格处理投资者、股东、分析师及其他资本市场参与者的个人信息，用于：

Tigermed processes personal information of investors, shareholders, analysts, and other capital market participants for the purpose of:

- 投资者沟通与关系管理 / Investor communication and relationship management
- 股东大会与公司治理 / Shareholder meetings and corporate governance
- 信息披露与监管合规 / Information disclosure and regulatory compliance
- 股东登记与权益管理 / Shareholder registration and rights management

此类处理的法律依据通常包括：遵守法定义务（如证券法、公司法）以及泰格的合法利益。

The legal bases for such processing typically include: compliance with legal obligations (such as securities law and company law) and Tigermed's legitimate interests.

5.7 法律合规与安全保障 / Legal Compliance and Security

泰格可能在以下情形下处理个人信息：

Tigermed may process personal information in the following circumstances:

- 遵守适用的法律法规、监管要求和法院命令 / Complying with applicable laws and regulations, regulatory requirements, and court orders
- 回应政府机关或监管机构的合法请求 / Responding to lawful requests from government authorities or regulatory bodies
- 建立、行使或抗辩法律主张 / Establishing, exercising, or defending legal claims
- 防止、调查和处理欺诈、安全事件和违法行为 / Preventing, investigating, and addressing fraud, security incidents, and illegal activities
- 保护泰格、员工、客户及公众的权利、财产和安全 / Protecting the rights, property, and safety of Tigermed, employees, clients, and the public
- IT 安全、网络安全与信息系统管理 / IT security, cybersecurity, and information system management
- 业务连续性与灾难恢复 / Business continuity and disaster recovery
- 审计、合规与风险管理 / Audit, compliance, and risk management

此类处理的法律依据通常包括：遵守法定义务、泰格的合法利益以及保护重大利益所必需。

The legal bases for such processing typically include: compliance with legal obligations, Tigermed's legitimate interests, and necessity for the protection of vital interests.

6. 敏感个人信息 / Sensitive Personal Information

泰格认识到敏感个人信息需要更高水平的保护。泰格仅在以下情况下处理敏感个人信息：

Tigermed recognizes that sensitive personal information requires a higher level of protection. Tigermed processes sensitive personal information only in the following circumstances:

- 获得数据主体的明示同意（在适用法律要求的情况下） / **Obtaining explicit consent from the data subject (where required by applicable law)**
- 为履行法律法规义务所必需，特别是在劳动法、社会保障法和公共卫生法领域 / **Necessary for compliance with legal and regulatory obligations, particularly in the areas of labor law, social security law, and public health law**
- 为公共卫生领域的公共利益所必需，如确保医疗产品和服务的高质量与安全标准 / **Necessary for reasons of public interest in the area of public health, such as ensuring high standards of quality and safety of medical products and services**
- 为医学或临床研究目的所必需，并在适当的保障措施下进行 / **Necessary for medical or clinical research purposes, subject to appropriate safeguards**
- 为建立、行使或抗辩法律主张所必需 / **Necessary for the establishment, exercise, or defense of legal claims**
- 涉及数据主体已明显公开的个人信息 / **Involving personal information that has been manifestly made public by the data subject**

在临床试验中，泰格处理的健康数据和受保护健康信息（PHI）属于敏感个人信息。泰格采取额外的安全措施保护此类信息，包括密钥编码、访问控制、加密传输和存储、严格的保密协议以及定期的安全审计。

In clinical trials, health data and protected health information (PHI) processed by Tigermed constitute sensitive personal information. Tigermed implements additional security measures to protect such information, including key-coding, access control, encrypted transmission and storage, strict confidentiality agreements, and regular security audits.

敏感个人信息的处理目的须经泰格管理层或其指定人员及数据保护官（DPO）批准。泰格不会将敏感个人信息用于本政策未载明的目的，除非获得数据主体的明示同意或适用法律另有要求。

The purposes for processing sensitive personal information must be approved by Tigermed management or their designees and the Data Protection Officer (DPO). Tigermed will not use sensitive personal information for purposes not described in this Policy unless explicit consent is obtained from the data subject or otherwise required by applicable law.

7. 个人信息的共享与披露 / Sharing and Disclosure of Personal Information

泰格重视个人信息的保密，不会随意共享或披露个人信息。泰格仅在以下情况下共享或披露个人信息：

Tigermed values the confidentiality of personal information and will not share or disclose personal information indiscriminately. Tigermed shares or discloses personal information only in the following circumstances:

7.1 经数据主体同意 / With the Data Subject's Consent

在获得数据主体明确同意的情况下，泰格可能向第三方共享或披露个人信息。数据主体有权随时撤回同意，但撤回同意不影响撤回前基于同意已进行的处理活动的合法性。

With the explicit consent of the data subject, Tigermed may share or disclose personal information to third parties. The data subject has the right to withdraw consent at any time, but the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

7.2 向关联公司共享 / Sharing with Affiliated Companies

泰格可能向其全球子公司、关联实体和母公司共享个人信息，用于本政策所述的处理目的。此类共享受泰格内部数据保护政策和约束性公司规则（如适用）的约束，确保所有关联实体提供同等水平的个人信息保护。

Tigermed may share personal information with its global subsidiaries, affiliated

entities, and parent company for the processing purposes described in this Policy. Such sharing is subject to Tigermed's internal data protection policies and binding corporate rules (where applicable), ensuring that all affiliated entities provide an equivalent level of personal information protection.

7.3 向服务提供商和供应商共享 / Sharing with Service Providers and Suppliers

泰格可能委托第三方服务提供商和供应商代表泰格处理个人信息，以支持泰格的业务运营。此类第三方可能包括：

Tigermed may engage third-party service providers and suppliers to process personal information on behalf of Tigermed to support its business operations. Such third parties may include:

- IT 服务提供商（云服务、数据托管、软件服务等） / IT service providers (cloud services, data hosting, software services, etc.)
- 数据管理与统计分析服务商 / Data management and statistical analysis service providers
- 薪酬与福利管理服务商 / Compensation and benefits management service providers
- 差旅与费用管理服务商 / Travel and expense management service providers
- 法律咨询、审计与专业服务提供商 / Legal, audit, and professional service providers
- 营销与沟通服务提供商 / Marketing and communication service providers
- 翻译与本地化服务提供商 / Translation and localization service providers

泰格要求所有第三方服务提供商和供应商签署数据处理协议或保密协议，明确其个人信息保护义务，确保其仅按照泰格的指示处理个人信息，并采取适当的安全措施。

Tigermed requires all third-party service providers and suppliers to sign data processing agreements or confidentiality agreements that specify their personal information protection obligations, ensure that they process personal information only in accordance with Tigermed's instructions, and implement appropriate security

measures.

7.4 临床试验相关共享 / Clinical Trial-Related Sharing

在临床试验中，泰格可能按照适用法律法规、GCP 要求、研究方案和合同约定，与以下各方共享临床试验相关个人信息：

In clinical trials, Tigermed may share clinical trial-related personal information with the following parties in accordance with applicable laws and regulations, GCP requirements, study protocols, and contractual agreements:

- 申办方及其关联公司 / The sponsor and its affiliated companies
- 研究者和研究中心 / Investigators and study sites
- 伦理委员会和监管机构 / Ethics committees and regulatory authorities
- 中心实验室、影像评估中心和其他专业服务提供商 / Central laboratories, imaging core laboratories, and other specialized service providers
- 数据安全监查委员会（DSMB）和独立数据监查委员会 / Data Safety Monitoring Boards (DSMB) and independent data monitoring committees

在临床试验中共享的个人信息通常以密钥编码或去标识化形式进行，以最大程度保护试验参与者隐私。直接标识符（如姓名、身份证号）通常由研究者持有，不传输给申办方或 CRO。

Personal information shared in clinical trials is typically conducted in key-coded or de-identified form to maximize participant privacy protection. Direct identifiers (such as names, national ID numbers) are typically held by the investigator and not transmitted to the sponsor or CRO.

7.5 法律要求与监管披露 / Legal Requirements and Regulatory Disclosure

在以下情况下，泰格可能被要求披露个人信息：

Tigermed may be required to disclose personal information in the following circumstances:

- 遵守适用的法律法规、法院命令或法律程序 / **Complying with applicable laws and regulations, court orders, or legal proceedings**
- 回应政府机关、监管机构或执法部门的合法请求，包括满足国家安全或执法要求 / **Responding to lawful requests from government authorities, regulatory bodies, or law enforcement, including meeting national security or law enforcement requirements**
- 在诉讼或仲裁中作为证据提交 / **Submitting as evidence in litigation or arbitration**
- 执行泰格的政策、合同或协议 / **Enforcing Tigermed's policies, contracts, or agreements**
- 收取欠付款项 / **Collecting amounts owed to Tigermed**
- 防止人身伤害、财产损失或调查、起诉疑似或实际的非法活动 / **Preventing personal injury, property loss, or investigating and prosecuting suspected or actual illegal activities**

在法律允许的范围内，泰格将在披露前通知数据主体，并采取措施确保披露范围最小化。

To the extent permitted by law, Tigermed will notify the data subject before disclosure and take measures to ensure the scope of disclosure is minimized.

7.6 企业交易 / Business Transactions

在发生或拟发生涉及泰格业务运营、资产或股份的重大交易（如合并、收购、重组、资产出售、合资或破产）时，泰格可能转让个人信息作为交易的一部分。在此类情况下，泰格将要求受让方以符合本政策的方式使用和保护个人信息，并在适用法律要求的范围内通知数据主体。

In the event of a proposed or actual significant transaction involving Tigermed's business operations, assets, or shares (such as a merger, acquisition, reorganization, asset sale, joint venture, or bankruptcy), Tigermed may transfer personal information as part of the transaction. In such cases, Tigermed will require the transferee to use and protect personal information in a manner consistent with this Policy and notify data subjects to the extent required by applicable law.

7.7 向前传输责任 / Onward Transfer Accountability

泰格对其向第三方传输的个人信息负责。泰格将采取合理措施确保接收个人信息的第三方提供与本政策和适用法律要求同等水平的保护。如果泰格得知第三方正在以违反本政策的方式使用或披露个人信息，泰格将采取合理措施防止或停止该使用或披露。对于向前传输，在泰格责任范围内，如果第三方以不符合本政策和适用法律的方式处理个人信息，泰格仍应承担责任。

Tigermed is accountable for personal information it transfers to third parties. Tigermed will take reasonable steps to ensure that third parties receiving personal information provide an equivalent level of protection as required by this Policy and applicable law. If Tigermed learns that a third party is using or disclosing personal information in a manner contrary to this Policy, Tigermed will take reasonable steps to prevent or stop such use or disclosure. For onward transfers, within the scope of Tigermed's responsibility, Tigermed remains liable if a third party processes personal information in a manner inconsistent with this Policy and applicable law.

8. 跨境数据传输 / Cross-Border Data Transfers

作为一家全球化运营的 CRO，泰格可能需要将个人信息传输至数据主体所在国家或地区以外的国家或地区。此类跨境传输可能发生在以下情形：

As a globally operating CRO, Tigermed may need to transfer personal information to countries or regions outside the country or region where the data subject is located. Such cross-border transfers may occur in the following circumstances:

- 跨国临床试验的数据收集、管理和分析 / Data collection, management, and analysis for multinational clinical trials
- 向位于其他国家的申办方传输临床试验数据 / Transfer of clinical trial data to sponsors located in other countries
- 泰格全球子公司和关联实体之间的数据共享 / Data sharing among Tigermed's global subsidiaries and affiliated entities
- 使用位于其他国家的云服务和 IT 基础设施 / Use of cloud services and IT infrastructure

located in other countries

- 向位于其他国家的服务提供商和供应商传输数据 / **Transfer of data to service providers and suppliers located in other countries**

泰格承诺在进行跨境数据传输时遵守适用的法律法规，确保个人信息得到充分保护。泰格采取以下措施保障跨境数据传输的合法性和安全性：

Tigermed is committed to complying with applicable laws and regulations when conducting cross-border data transfers and ensuring that personal information is adequately protected. Tigermed takes the following measures to safeguard the legality and security of cross-border data transfers:

8.1 充分性评估 / Adequacy Assessment

在向第三国传输个人信息前，泰格将评估接收国的个人信息保护水平，确认其是否能够提供充分的保护。如适用，泰格将依赖欧盟委员会的充分性认定或其他司法管辖区的等效机制。

Before transferring personal information to a third country, Tigermed will assess the level of personal information protection in the receiving country to confirm whether it can provide adequate protection. Where applicable, Tigermed will rely on the European Commission's adequacy decisions or equivalent mechanisms in other jurisdictions.

8.2 适当保障措施 / Appropriate Safeguards

在不存在充分性认定的情况下，泰格将采取适当的保障措施，确保跨境数据传输符合适用法律。

此类保障措施可能包括：

In the absence of an adequacy decision, Tigermed will implement appropriate safeguards to ensure that cross-border data transfers comply with applicable law. Such safeguards may include:

- 签署欧盟委员会批准的标准合同条款（SCC） / **Signing Standard Contractual Clauses**

(SCCs) approved by the European Commission

- 签署中国国家互联网信息办公室发布的《个人信息出境标准合同》 / Signing the Standard Contract for Personal Information Cross-Border Transfer issued by the Cyberspace Administration of China
- 签署具有约束力的公司规则（BCR） / Adopting Binding Corporate Rules (BCRs)
- 签署经批准的行为准则或认证机制 / Adhering to approved codes of conduct or certification mechanisms
- 签署数据传输协议（DTA），包含明确的数据保护义务 / Signing Data Transfer Agreements (DTAs) containing explicit data protection obligations

8.3 传输影响评估 / Transfer Impact Assessment

在向第三国传输个人信息前，泰格将在必要时进行传输影响评估，评估接收国的法律和实践对个人信息保护的影响，并采取必要的补充措施（如加密、假名化、额外的合同条款等）以确保个人信息得到充分保护。

Before transferring personal information to a third country, Tigermed will, where necessary, conduct a transfer impact assessment to evaluate the impact of the receiving country's laws and practices on personal information protection and take necessary supplementary measures (such as encryption, pseudonymization, additional contractual clauses, etc.) to ensure adequate protection of personal information.

8.4 数据主体告知 / Data Subject Notification

在进行跨境数据传输时，泰格将按照适用法律的要求向数据主体告知跨境传输的情况，包括接收方所在国家或地区、传输目的、接收方身份以及数据主体可行使的权利。

When conducting cross-border data transfers, Tigermed will inform data subjects of the cross-border transfer as required by applicable law, including the country or region of the recipient, the purpose of the transfer, the identity of the recipient, and the rights the data subject may exercise.

8.5 中国出境特殊要求 / Special Requirements for Outbound Transfers from China

从中国境内向境外传输个人信息时，泰格将遵守《中华人民共和国个人信息保护法》《数据出境安全评估办法》《个人信息出境标准合同办法》等相关法律法规的要求，包括但不限于：

When transferring personal information from within China to overseas, Tigermed will comply with the requirements of relevant laws and regulations such as the Personal Information Protection Law of the People's Republic of China, the Measures for Security Assessment of Data Outbound Transfers, and the Measures for Standard Contracts for Personal Information Cross-Border Transfers, including but not limited to:

- 在达到法定阈值时向国家互联网信息办公室申报数据出境安全评估 / Declaring data outbound security assessment to the Cyberspace Administration of China when statutory thresholds are met
- 签署并备案个人信息出境标准合同 / Signing and filing standard contracts for personal information cross-border transfer
- 通过个人信息保护认证 / Obtaining personal information protection certification
- 向数据主体告知出境情况并取得单独同意（在适用情况下） / Informing data subjects of the outbound transfer and obtaining separate consent (where applicable)
- 开展个人信息保护影响评估（PIA） / Conducting Personal Information Protection Impact Assessment (PIA)

8.6 临床试验数据跨境传输 / Cross-Border Transfer of Clinical Trial Data

在临床试验中，从中国向其他国家传输试验参与者个人信息，以及从欧盟向中国传输个人信息，将受到严格限制，除非该传输已获得相关监管机构的通知和批准（如适用），或符合适用法律规定的其他传输方式。临床试验数据的电子传输方式应由申办方在合同中明确规定；如申办方未规定，应与申办方协商确定并以书面形式记录。

In clinical trials, the transfer of participant personal information from China to other

countries, as well as from the EU to China, including to any foreign entities or individuals, shall be strictly limited unless the transfer has been notified to and approved by the competent regulatory authorities (where applicable), or other transfer methods are available under applicable legislation. The method of electronic transfer of clinical trial data shall be specified by the sponsor in the contract; if not specified by the sponsor, it shall be determined through discussion with the sponsor and documented in writing.

9. 数据安全 / Data Security

泰格高度重视个人信息安全，承诺采取合理且适当的技术、组织和物理安全措施，保护其持有的个人信息免受丢失、误用、未经授权的访问、披露、更改和销毁，无论此类个人信息是以电子形式还是纸质形式存在。

Tigermed attaches great importance to personal information security and is committed to implementing reasonable and appropriate technical, organizational, and physical security measures to protect personal information in its possession from loss, misuse, unauthorized access, disclosure, alteration, and destruction, whether such personal information exists in electronic or paper form.

9.1 技术安全措施 / Technical Security Measures

泰格实施以下技术安全措施保护个人信息：

Tigermed implements the following technical security measures to protect personal information:

- 访问控制：基于角色的访问控制（RBAC），最小权限原则，多因素认证 / Access control: role-based access control (RBAC), principle of least privilege, multi-factor authentication
- 加密：传输中加密（TLS/SSL）和静态加密（AES-256），敏感数据加密存储 / Encryption: encryption in transit (TLS/SSL) and encryption at rest (AES-256), encrypted storage of sensitive data

- 网络安全：防火墙、入侵检测/防御系统、安全网关、网络分段 / **Network security:** firewalls, intrusion detection/prevention systems, secure gateways, network segmentation
- 终端安全：端点保护、设备加密、移动设备管理 / **Endpoint security:** endpoint protection, device encryption, mobile device management
- 数据备份与恢复：定期备份、异地备份、灾难恢复计划 / **Data backup and recovery:** regular backups, off-site backups, disaster recovery plans
- 安全监控与日志：安全事件监控、日志记录与审计、异常检测 / **Security monitoring and logging:** security event monitoring, log recording and auditing, anomaly detection
- 漏洞管理：定期安全扫描、渗透测试、补丁管理 / **Vulnerability management:** regular security scanning, penetration testing, patch management

9.2 组织安全措施 / Organizational Security Measures

泰格实施以下组织安全措施保护个人信息：

Tigermed implements the following organizational security measures to protect personal information:

- 信息安全治理：设立信息安全委员会，明确安全职责与问责机制 / **Information security governance:** establishing an information security committee, clarifying security responsibilities and accountability mechanisms
- 安全策略与规程：制定并维护全面的信息安全策略、标准和操作规程 / **Security policies and procedures:** developing and maintaining comprehensive information security policies, standards, and operating procedures
- 人员安全：入职背景调查、保密协议签署、安全意识培训、离职权限回收 / **Personnel security:** pre-employment background checks, confidentiality agreement signing, security awareness training, access revocation upon termination
- 第三方安全管理：供应商安全评估、合同安全条款、定期审计 / **Third-party security management:** supplier security assessment, contractual security clauses, regular audits
- 物理安全：数据中心访问控制、监控摄像、门禁系统、安全区域管理 / **Physical security:** data center access control, CCTV, access control systems, secure area

management

- 业务连续性：业务连续性计划、应急响应预案、定期演练 / Business continuity: business continuity plans, emergency response plans, regular drills

9.3 敏感数据特殊保护 / Special Protection for Sensitive Data

对于离开或可能离开泰格或可信第三方场所的电子敏感个人信息（如备份、笔记本电脑、可移动存储设备、电子邮件、通过公共或非可信网络传输），必须进行加密。对于不离开泰格或可信第三方场所的电子敏感个人信息，应在技术升级提供加密能力时逐步实施加密。

Any electronic sensitive personal information that leaves, or may leave, Tigermed or Trusted Third Party premises (e.g., backups, laptops, removable storage devices, email, and transfer over public or non-trusted networks) must be encrypted. For electronic sensitive personal information that does not leave Tigermed or Trusted Third Party premises, encryption must be implemented prospectively as technology upgrades provide encryption capabilities.

纸质敏感个人信息必须存放在上锁的文件柜中，仅授权人员可访问。携带个人信息离开公司场所须有合理依据并获得适当批准。

Paper-based sensitive personal information must be stored in locked file cabinets with access granted only to authorized personnel. Carrying personal information off company premises must have a reasonable basis and obtain appropriate approval.

9.4 数据泄露响应 / Data Breach Response

泰格制定了个人数据泄露响应计划，旨在及时响应和上报所有与隐私相关的问题、投诉和顾虑，包括任何潜在的隐私或安全事件。在发生或疑似发生个人信息泄露时，泰格将按照以下原则处理：

Tigermed has established a personal data breach response plan designed to promptly respond to and report all privacy-related issues, complaints, and concerns, including any potential privacy or security incidents. In the event of a suspected or

actual personal information breach, Tigermed will handle it in accordance with the following principles:

- 及时发现与报告：员工发现或疑似数据泄露应立即报告 / **Timely detection and reporting: employees should immediately report suspected or actual data breaches**
- 快速响应与遏制：立即采取措施遏制泄露，防止进一步扩散 / **Rapid response and containment: immediately take measures to contain the breach and prevent further spread**
- 调查与评估：调查泄露原因、范围和影响，评估风险 / **Investigation and assessment: investigate the cause, scope, and impact of the breach, assess risks**
- 通知与报告：按照适用法律要求的时限通知数据控制者（当泰格作为数据处理者时），监管机构和数据主体 / **Notification and reporting: notify controller (when Tigermed acts as processor), regulatory authorities and data subjects within the timeframes required by applicable law**
- 补救与恢复：采取补救措施，恢复系统和数据安全 / **Remediation and recovery: take remedial measures to restore system and data security**
- 复盘与改进：分析根本原因，改进安全措施，防止类似事件再次发生 / **Review and improvement: analyze root causes, improve security measures, prevent recurrence**

在适用法律要求的情况下，泰格将在知悉个人信息泄露后及时（在 GDPR 下通常为 72 小时内）通知监管机构，并在泄露可能对数据主体的权利和自由造成高风险时通知数据主体。

Where required by applicable law, Tigermed will notify the regulatory authority without undue delay (generally within 72 hours under GDPR) after becoming aware of a personal information breach, and will notify data subjects where the breach is likely to result in a high risk to their rights and freedoms.

10. 数据保留 / Data Retention

泰格仅在实现处理目的所必需的期限内保留个人信息，或在适用法律要求或许可的期限内保留。超过保留期限的个人信息将被安全删除或匿名化处理。

Tigermed retains personal information only for as long as necessary to fulfill the purposes for which it was processed, or for as long as required or permitted by applicable law. Personal information that exceeds the retention period will be securely deleted or anonymized.

10.1 保留期限确定标准 / Criteria for Determining Retention Periods

泰格在确定个人信息保留期限时考虑以下因素：

Tigermed considers the following factors when determining personal information retention periods:

- 处理目的的需要：包括提供服务、履行合同、维护业务关系的需要 / The needs of the processing purpose: including the need to provide services, perform contracts, and maintain business relationships
- 法律义务：适用法律法规要求的最低保留期限（如税法、劳动法、GCP、药品监管法规等） / Legal obligations: minimum retention periods required by applicable laws and regulations (such as tax law, labor law, GCP, pharmaceutical regulatory laws, etc.)
- 诉讼时效：潜在法律主张的诉讼时效 / Statute of limitations: the limitation period for potential legal claims
- 行业标准与惯例：CRO 和临床研究行业的标准保留期限 / Industry standards and practices: standard retention periods in the CRO and clinical research industry
- 数据主体同意：数据主体同意的保留期限 / Data subject consent: the retention period consented to by the data subject

10.2 临床试验数据保留 / Clinical Trial Data Retention

临床试验相关个人信息的保留期限将根据适用的 GCP 要求、药品监管法规、研究方案和合同约定确定。通常，临床试验数据需在研究结束后保留一定期限（如至少 25 年或适用法律要求的更长期限），以满足监管要求和可能的稽查需要。

The retention period for clinical trial-related personal information will be determined in accordance with applicable GCP requirements, pharmaceutical regulatory laws,

study protocols, and contractual agreements. Typically, clinical trial data must be retained for a certain period after study completion (such as at least 25 years or a longer period required by applicable law) to meet regulatory requirements and potential audit needs.

在保留期限届满后，泰格将按照适用法律和合同约定安全删除或匿名化临床试验数据，除非数据主体明确同意继续保留或保留为履行法定义务所必需。

After the retention period expires, Tigermed will securely delete or anonymize clinical trial data in accordance with applicable law and contractual agreements, unless the data subject has explicitly consented to continued retention or retention is necessary for compliance with legal obligations.

10.3 删除与销毁 / Deletion and Destruction

当个人信息不再需要保留时，泰格将采取安全的方式删除或销毁个人信息，包括：

When personal information no longer needs to be retained, Tigermed will delete or destroy it in a secure manner, including:

- 电子数据：安全擦除、物理销毁存储介质、加密销毁 / Electronic data: secure erasure, physical destruction of storage media, cryptographic destruction
- 纸质文件：粉碎、焚烧或其他安全销毁方式 / Paper documents: shredding, incineration, or other secure destruction methods
- 记录保存：记录删除的人员、时间和原因 / Record keeping: documenting who deleted the personal information, when, and why

11. 数据主体权利 / Your Privacy Rights

根据数据主体所在司法管辖区的适用法律，数据主体可能享有与个人信息处理相关的以下权利。

泰格尊重并保障数据主体依法行使这些权利。

Depending on the applicable law in the data subject's jurisdiction, data subjects may

have the following rights related to the processing of their personal information. Tigermed respects and safeguards data subjects' exercise of these rights in accordance with the law.

11.1 知情权与访问权 / Right to Be Informed and Right of Access

数据主体有权确认泰格是否正在处理其个人信息，并在处理时获取访问权及以下信息：处理目的、涉及的个人信息类别、接收方或接收方类别、预期存储期限或确定存储期限的标准、数据主体权利的存在、向监管机构投诉的权利、个人信息来源（如非直接收集）、自动化决策的存在及相关逻辑信息。如个人信息被传输至第三国或国际组织，数据主体还有权获知与传输相关的适当保障措施。

Data subjects have the right to obtain confirmation from Tigermed as to whether or not personal information concerning them is being processed, and where that is the case, access to the personal information and the following information: the purposes of the processing, the categories of personal information concerned, the recipients or categories of recipients, the envisaged storage period or criteria used to determine that period, the existence of data subject rights, the right to lodge a complaint with a supervisory authority, the source of the personal information (where not collected directly), and the existence of automated decision-making and related logic information. Where personal information is transferred to a third country or international organization, data subjects also have the right to be informed of appropriate safeguards relating to the transfer.

11.2 更正权 / Right to Rectification

数据主体有权要求泰格更正关于其的不准确或不完整的个人信息。考虑到处理目的，数据主体有权通过补充声明等方式完善不完整的个人信息。

Data subjects have the right to request Tigermed to rectify inaccurate or incomplete personal information concerning them. Taking into account the purposes of the processing, data subjects have the right to have incomplete personal information

completed, including by means of providing a supplementary statement.

11.3 删除权（被遗忘权） / Right to Erasure (Right to Be Forgotten)

在以下情形下，数据主体有权要求泰格删除其个人信息：个人信息对于收集或处理的目的已不再必要；数据主体撤回同意且处理无其他法律依据；数据主体反对处理且泰格无压倒性的合法理由；处理非法；删除为履行法定义务所必需。但在以下情况下，泰格可能无法满足删除请求：删除为行使言论自由权或信息自由权所必需；为遵守法定义务或为公共卫生、科学或历史研究目的所必需；为建立、行使或抗辩法律主张所必需。

In the following circumstances, data subjects have the right to request Tigermed to erase their personal information: the personal information is no longer necessary for the purposes for which it was collected or processed; the data subject withdraws consent and there is no other legal basis for processing; the data subject objects to processing and Tigermed has no overriding legitimate grounds; the processing is unlawful; erasure is necessary for compliance with a legal obligation. However, Tigermed may not be able to fulfill erasure requests in the following cases: erasure is necessary for the exercise of the right to freedom of expression and information; for compliance with a legal obligation or for reasons of public interest in public health, scientific or historical research; or for the establishment, exercise, or defense of legal claims.

11.4 限制处理权 / Right to Restriction of Processing

在以下情形下，数据主体有权要求泰格限制处理其个人信息：个人信息的准确性受到质疑（限制期限应为泰格核实准确性所需的合理期限）；处理非法且数据主体反对删除而要求限制使用；泰格不再需要个人信息用于处理目的，但数据主体需要用于建立、行使或抗辩法律主张；数据主体对处理提出反对，在泰格的合法理由是否凌驾于数据主体的理由之上的核实期间。

In the following circumstances, data subjects have the right to request Tigermed to restrict the processing of their personal information: the accuracy of the personal

information is contested (for a period enabling Tigermed to verify the accuracy); the processing is unlawful and the data subject opposes erasure and requests restriction of use instead; Tigermed no longer needs the personal information for the purposes of processing, but the data subject requires it for the establishment, exercise, or defense of legal claims; the data subject has objected to processing, pending verification of whether Tigermed's legitimate grounds override those of the data subject.

11.5 数据可携带权 / Right to Data Portability

在处理基于同意或合同且通过自动化方式进行的情况下，数据主体有权以结构化、通用和机器可读的格式接收其个人信息，并有权将该信息传输给另一控制者而不受泰格阻碍（在技术可行的情况下）。

Where processing is based on consent or a contract and is carried out by automated means, data subjects have the right to receive their personal information in a structured, commonly used, and machine-readable format and have the right to transmit that information to another controller without hindrance from Tigermed (where technically feasible).

11.6 反对权 / Right to Object

数据主体有权在任何时候基于其特定情况，反对基于泰格或第三方合法利益的个人信息处理，包括画像。泰格将不再处理该个人信息，除非泰格能够证明存在压倒性的合法理由进行处理，或处理为建立、行使或抗辩法律主张所必需。数据主体还有权反对泰格为直接营销目的处理其个人信息，包括与该营销相关的画像。

Data subjects have the right to object at any time, on grounds relating to their particular situation, to the processing of their personal information which is based on the legitimate interests of Tigermed or a third party, including profiling. Tigermed will no longer process the personal information unless Tigermed can demonstrate compelling legitimate grounds for the processing that override the interests and

rights of the data subject, or the processing is for the establishment, exercise, or defense of legal claims. Data subjects also have the right to object to the processing of their personal information by Tigermed for direct marketing purposes, including profiling related to such marketing.

11.7 撤回同意权 / Right to Withdraw Consent

在处理基于数据主体同意的情况下，数据主体有权随时撤回同意。撤回同意不影响撤回前基于同意已进行的处理活动的合法性。

Where processing is based on the data subject's consent, data subjects have the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

11.8 自动化决策相关权利 / Rights Related to Automated Decision-Making

在存在自动化决策（包括画像）且对数据主体产生法律效力或类似重大影响的情况下，数据主体有权要求泰格说明决策逻辑，并有权对决策提出异议和要求人工干预。泰格不会仅基于自动化处理作出对数据主体产生法律效力或类似重大影响的决策，除非适用法律另有规定或数据主体明确授权。

Where automated decision-making (including profiling) exists and produces legal effects concerning the data subject or similarly significantly affects them, data subjects have the right to request Tigermed to explain the decision logic and have the right to contest the decision and request human intervention. Tigermed will not make decisions based solely on automated processing that produce legal effects concerning the data subject or similarly significantly affect them, unless otherwise provided by applicable law or explicitly authorized by the data subject.

11.9 拒绝营销权 / Right to Opt Out of Marketing

数据主体有权拒绝泰格为营销目的处理其个人信息。数据主体可以通过以下方式行使该权利：点击营销电子邮件中的“退订”链接、回复“STOP”至营销短信、或通过本政策“联系方式”部分提供的渠

道联系泰格。

Data subjects have the right to opt out of the processing of their personal information for marketing purposes by Tigermed. Data subjects may exercise this right by: clicking the "unsubscribe" link in marketing emails, replying "STOP" to marketing text messages, or contacting Tigermed through the channels provided in the "Contact Information" section of this Policy.

11.10 向监管机构投诉权 / Right to Lodge a Complaint with a Supervisory Authority

数据主体有权向其所在国家或地区的数据保护监管机构投诉泰格的个人信息处理活动，特别是在数据主体的惯常居住地、工作地或涉嫌侵权行为发生地的监管机构。

Data subjects have the right to lodge a complaint with the data protection supervisory authority in their country or region regarding Tigermed's personal information processing activities, particularly with the supervisory authority in the place of their habitual residence, place of work, or place of the alleged infringement.

11.11 权利行使方式 / How to Exercise Your Rights

数据主体可以通过以下方式行使上述权利：

Data subjects may exercise the above rights through the following means:

- 通过泰格官方网站提交请求: [合规疑虑](#) / Submitting a request through Tigermed's official website: [Compliance Concern](#)
- 发送电子邮件至数据保护官邮箱: DPO@tigermedgrp.com / Sending an email to the Data Protection Officer at: DPO@tigermedgrp.com
- 联系泰格相关人员或发送正式信函 / Contacting relevant Tigermed personnel or sending a formal letter

数据主体也可以指定授权代理人代表其提交请求。如需指定代理人，应同时向泰格提供经数据主体和代理人签字的书面授权文件或授权委托书。

Data subjects may also designate an authorized agent to submit requests on their behalf. To designate an agent, a written authorization document or power of attorney signed by both the data subject and the agent should be provided to Tigermed.

在响应请求前，泰格可能需要验证数据主体的身份，以防止未经授权访问个人信息。泰格将要求数据主体提供足够的信息以合理验证其身份。

Before responding to a request, Tigermed may need to verify the data subject's identity to prevent unauthorized access to personal information. Tigermed will require the data subject to provide sufficient information to reasonably verify their identity.

泰格将在收到请求后的合理期限内（通常为 15 个工作日内，或适用法律要求的更短期限内）响应数据主体的请求。如请求复杂或数量较多，泰格可在适用法律允许的范围内适当延长响应时间，并将及时通知数据主体延期原因。

Tigermed will respond to data subject requests within a reasonable period after receipt (typically within 15 working days, or a shorter period required by applicable law). If requests are complex or numerous, Tigermed may extend the response time as permitted by applicable law and will promptly notify the data subject of the reasons for the extension.

泰格将对所有数据主体请求进行记录，包括请求性质、采取的行动以及处理时间。泰格通常免费响应数据主体的权利请求，但对于明显无根据、过度或重复的请求，泰格可在适用法律允许的范围内收取合理的管理费用或拒绝响应。

Tigermed will maintain records of all data subject requests, including the nature of the request, actions taken, and processing time. Tigermed typically responds to data subject rights requests free of charge, but for manifestly unfounded, excessive, or repetitive requests, Tigermed may charge a reasonable administrative fee or refuse to respond as permitted by applicable law.

11.12 临床试验参与者权利的特殊限制 / Special Restrictions on Rights of Clinical Trial Participants

在泰格的正常业务中，除非获得申办方授权且当地法律法规允许，否则禁止直接与试验参与者联系。泰格仅持有与临床试验参与者相关的密钥编码个人信息。如临床试验参与者提出访问请求，该请求应转交持有密钥的相关研究者。此类请求应明确说明联系的具体目的，且应清晰、有限并以书面形式提出。

In Tigermed's normal business, direct contact with participants is forbidden unless authorized by a sponsor and permissible by local laws and regulations. Tigermed retains only key-coded personal information relating to a clinical trial participant. In the case of a participant making an access request, the request should be referred to the relevant investigator(s) who holds the key. Such requests shall indicate the specific purpose of the contact, be clearly determined, limited, and in writing.

12. 儿童隐私 / Children's Privacy

保护儿童的隐私尤为重要。泰格的网站和在线服务不面向不满十四周岁的未成年人（或适用法律规定的其他年龄阈值），泰格不会故意收集此类未成年人的个人信息。

Protecting the privacy of children is particularly important. Tigermed's websites and online services are not directed at minors under the age of 14 (or other age thresholds specified by applicable law), and Tigermed does not knowingly collect personal information from such minors.

在临床试验中，可能涉及未成年人作为试验参与者。在此情况下，泰格将严格遵守适用的法律法规和 GCP 要求，确保获得未成年人的法定监护人的知情同意，并在适当情况下获得未成年人本人的同意。涉及未成年人的个人信息将受到额外的保护措施。

In clinical trials, minors may be involved as participants. In such cases, Tigermed will strictly comply with applicable laws and regulations and GCP requirements, ensuring that informed consent is obtained from the minor's legal guardian and, where

appropriate, assent from the minor themselves. Personal information involving minors will be subject to additional protective measures.

如果您得知您的孩子在未经您同意的情况下向泰格提供了个人信息，请通过本政策“联系方式”部分提供的渠道联系我们。如果泰格得知在未经适当同意的情况下收集了未成年人的个人信息，泰格将立即采取措施删除此类信息。

If you become aware that your child has provided personal information to Tigermed without your consent, please contact us through the channels provided in the "Contact Information" section of this Policy. If Tigermed becomes aware that personal information of a minor has been collected without appropriate consent, Tigermed will immediately take steps to delete such information.

13. 本政策的更新 / Updates to This Policy

泰格可能不时更新本政策，以反映法律法规的变化、业务实践的调整或技术发展。泰格将在其网站上发布本政策的更新版本，并注明修订日期。

Tigermed may update this Policy from time to time to reflect changes in laws and regulations, adjustments in business practices, or technological developments. Tigermed will post updated versions of this Policy on its website and indicate the revision date.

对于重大变更，泰格将按照适用法律的要求以显著方式通知数据主体，包括通过电子邮件（如适用）或在网站上发布显著通知。在变更生效后继续使用泰格的服务或向泰格提供个人信息，即表示您同意更新后的政策。

For material changes, Tigermed will notify data subjects in a prominent manner as required by applicable law, including by email (where applicable) or by posting a prominent notice on the website. Continued use of Tigermed's services or provision of personal information to Tigermed after the changes take effect constitutes your agreement to the updated Policy.

泰格建议您定期查阅本政策，以了解泰格的个人信息保护实践。

Tigermed recommends that you review this Policy periodically to stay informed about Tigermed's personal information protection practices.

14. 联系方式 / Contact Information

如您对本政策或泰格的个人信息处理活动有任何问题、意见、顾虑或投诉，或希望行使您的数据主体权利，请通过以下方式联系泰格数据保护官：

If you have any questions, comments, concerns, or complaints about this Policy or Tigermed's personal information processing activities, or wish to exercise your data subject rights, please contact Tigermed's Data Protection Officer through the following means:

数据保护官 / Data Protection Officer (DPO)

电子邮件 / Email: DPO@tigermedgrp.com

公司地址 / Company Address:

浙江省杭州市滨江区浦沿街道陆家潭街 508 号 5 楼 - 6 楼

5F-6F, No. 508, Lujiatan Street, Puyan Street, Binjiang District, Hangzhou City, Zhejiang Province

欧盟代表 / EU Representative:

公司名/Name: Tigermed SRL

地址/Address: Cozia 10 Str, Timisoara, Romania

泰格将尽合理努力调查和尝试解决与个人信息使用和披露有关的投诉和争议。如您对泰格的回复不满意，您有权向您所在司法管辖区的数据保护监管机构投诉。

Tigermed will use reasonable efforts to investigate and attempt to resolve complaints and disputes related to the use and disclosure of personal information. If you are not satisfied with Tigermed's response, you have the right to lodge a complaint with the data protection supervisory authority in your jurisdiction.

15. 生效日期 / Effective Date

本政策自 2026 年 8 月 25 日起生效。

This Policy is effective as of August 25, 2026.