

## 隐私政策 / PRIVACY POLICY

更新时间: 2026 年 1 月 5 日

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### 引言 / Introduction

欢迎您使用蓝海跨境智投中心!

蓝海跨境智投中心由上海无界智投网络科技有限公司(以下简称“我们”或“公司”)建设运营。/ Blue Sea Global Marketing Center is operated by BLUE SEA GLOBAL MARKETING LIMITED (hereinafter referred to as “We” or “Company”).

我们非常重视保护您(使用蓝海跨境智投中心产品的中国境内企业用户)的个人信息和隐私,您可以通过《蓝海跨境智投中心隐私政策》(以下简称“本隐私政策”)了解我们收集,使用,存储用户个人信息的情况,以及您所享有的相关权利。在您开始使用蓝海跨境智投中心产品前,请您务必先仔细阅读和理解本政策,特别应重点阅读我们以粗体标识的条款,确保您充分理解和同意之后再开始使用。/ We highly value the protection of your (enterprise users using Blue Sea Global Marketing Center products within China) personal information and privacy. You can learn about how we collect, use, and store user personal information, as well as your related rights, through this Privacy Policy (hereinafter referred to as “this Policy”). Before you start using Blue Sea Global Marketing Center products, please be sure to carefully read and understand this Policy, especially the clauses we have highlighted in bold, to ensure you fully understand and agree before you start using.

请知悉,如拒绝提供非必要个人信息或附加功能所需信息时,您仍然能够使用蓝海跨境智投中心产品基本功能。/ Please note that if you refuse to provide non-essential personal information or additional function-required information, you can still use the basic functions of Blue Sea Global Marketing Center products.

本政策将帮助您了解以下内容: / This Policy will help you understand the following:

1. 我们如何收集和使用您的个人信息 / How we collect and use your personal information
2. 我们如何委托处理,共享,转让,公开披露您的个人信息 / How we entrust processing, share, transfer, and publicly disclose your personal information
3. 我们如何使用 Cookie 和同类技术 / How we use Cookies and similar technologies
4. 我们如何存储您的个人信息 / How we store your personal information
5. 我们如何保护您的个人信息 / How we protect your personal information
6. 您如何管理您的个人信息 / How you can manage your personal information
7. 未成年人信息收集与使用 / Information collection and use regarding minors
8. 本政策如何更新 / How this Policy is updated
9. 如何联系我们 / How to contact us

### 一、我们如何收集和使用您的个人信息 / How We Collect and Use Your Personal Information

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。/ Personal information refers to various information recorded electronically or otherwise related to an identified or identifiable natural person, excluding anonymized information.

敏感个人信息是指一旦泄露或者非法使用,容易导致自然人的尊严受到侵害或者人身,财产安全受到危害的个人信息,包括生物识别,宗教信仰,特定身份,医疗健康,金融账户,行踪轨迹等信息,以及不满十四周岁未成年人的个人信息。/ Sensitive personal information refers to personal information that, once leaked or illegally used, is likely to cause harm to the dignity of natural persons or personal property safety, including biometric information, religious beliefs, specific identity, medical health, financial accounts, location tracking information, and personal information of minors under 14 years old.

您在使用蓝海跨境智投中心提供的服务时,我们会根据合法正当,必要,透明的原则,基于本政策所述的目的,收集和使用您的个人信息。/ When you use the services provided by Blue Sea Global Marketing Center, we will collect and use your personal information based on the principles of legality, legitimacy, necessity, and transparency, and for the purposes stated in this Policy.

#### (一)注册,登录场景 / (1) Registration and Login Scenario

当您注册,登录蓝海跨境智投中心产品时,我们需要收集您的手机号,邮箱,邀请码,公司名称信息。如您拒绝提供前述信息,您将无法注册登录。/ When you register and log in to Blue Sea Global Marketing Center products, we need to collect your phone number, email, invitation code, and company name. If you refuse to provide the aforementioned information, you will not be able to register or log in.

#### (二)服务使用场景 / (2) Service Usage Scenario

我们基于数据分析模型技术向您提供对话及互动服务。您可以通过对话框向我们发送文字,视频,图片,文件等内容,我们自动接收上述信息以便于向您提供数据分析,广告管理服务。/ We provide services to you based on data analysis model technology. You can send text, video, images, files, and other content to us through the dialogue box, and we automatically receive the above information to provide you with data analysis and advertising management services.

## 二、我们如何委托处理,共享,转让,公开披露您的个人信息 / How We Entrust Process, Share, Transfer, and Publicly Disclose Your Personal Information

### (一)委托处理 / (1) Entrusted Processing

基于履行本平台服务的需要,我们可能会委托华为云等第三方服务提供者代表我们处理您的信息,以便第三方服务提供者代表我们为您提供某些服务。对我们委托的第三方,我们将会根据法律法规的要求与其签署书面协议约定委托处理的目的,期限,处理方式,个人信息的种类,保护措施以及双方的权利和义务等,并对其个人信息处理活动进行监督,要求他们按照我们的要求,本政策中所声明的约束及其他任何相关书面协议和安全措施处理您的个人信息,禁止其将受托处

理的信息用于委托处理目的之外的用途。 / Based on the need to fulfill the platform's services, we may entrust Huawei Cloud and other third-party service providers to process your information on our behalf so that third-party service providers can provide you with certain services on our behalf. For third parties we entrust, we will, in accordance with the requirements of laws and regulations, sign written agreements with them regarding the purpose, duration, processing methods, types of personal information, protective measures, and the rights and obligations of both parties, and supervise their personal information processing activities, requiring them to process your personal information according to our requirements, the constraints declared in this Policy, and any other relevant written agreements and security measures, prohibiting them from using the entrusted information for purposes other than the entrusted processing purpose.

## (二) 共享 / (2) Sharing

我们不会与我们以外的任何公司, 组织和个人共享您的个人信息, 但以下情况除外: / We will not share your personal information with any company, organization, or individual outside of us, except in the following circumstances:

1. 在获取单独同意的情况下共享: 获得您的单独同意后, 我们会与其他方共享您的个人信息。 / Sharing upon obtaining separate consent: After obtaining your separate consent, we will share your personal information with other parties.
2. 我们可能会根据法律法规规定, 或按政府主管部门的强制性要求, 对外共享您的个人信息。 / We may share your personal information externally in accordance with laws and regulations or upon mandatory requirements from government authorities.

## (三) 转让 / (3) Transfer

我们不会将您的个人信息转让给任何公司, 组织和个人, 但以下情况除外: / We will not transfer your personal information to any company, organization, or individual, except in the following circumstances:

1. 在获取同意的情况下转让: 获得您的同意后, 我们会向其他方转让您的个人信息; / Transfer upon obtaining consent: After obtaining your consent, we will transfer your personal information to other parties;
2. 在我们发生合并, 分立, 解散或被宣告破产清算情形, 或其他涉及合并, 分立, 解散或被宣告破产清算情形时, 如涉及到个人信息转让, 我们会要求新的持有您个人信息的公司, 组织继续受本隐私权政策的约束, 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。 / When we undergo merger, division, dissolution, or bankruptcy liquidation, or other situations involving merger, division, dissolution, or bankruptcy liquidation, and personal information transfer is involved, we will require the new company or organization holding your personal information to continue to be bound by this Privacy Policy, otherwise we will require that company, organization, or individual to re-obtain your authorization consent.

## (四) 公开披露 / (4) Public Disclosure

我们仅会在以下情况下, 公开披露您的个人信息: / We will only publicly disclose your personal information under the following circumstances:

1. 获得您单独同意后; / After obtaining your separate consent;
2. 基于法律的披露: 在法律, 法律程序, 诉讼或政府主管部门强制性要求的情况下, 我们可能会公开披露您的个人信息。 / Disclosure based on law: We may publicly disclose your personal information in cases required by laws, legal procedures, litigation, or mandatory requirements from government authorities.

(五) 共享, 转让, 公开披露个人信息时事先征得同意的例外 / (5) Exceptions to Prior Consent for Sharing, Transferring, or Publicly Disclosing Personal Information

根据法律法规, 以下情形中, 我们共享, 转让, 公开披露个人信息不必事先征得您的授权同意: / According to laws and regulations, in the following circumstances, we may share, transfer, or publicly disclose personal information without obtaining your prior consent:

1. 与我们履行法律法规规定的义务相关的; / When related to fulfilling our obligations under laws and regulations;
2. 与国家安全, 国防安全直接相关的; / Directly related to national security and national defense security;
3. 与公共安全, 公共卫生, 重大公共利益直接相关的; / Directly related to public security, public health, or major public interests;
4. 与刑事侦查, 起诉, 审判和判决执行等直接相关的; / Directly related to criminal investigation, prosecution, trial, and judgment execution;
5. 出于维护您或其他个人的生命, 财产等重大合法权益但又很难得到本人授权同意的; / Difficult to obtain the individual's consent while necessary to protect the vital legitimate rights and interests of the individual or others;
6. 您自行向社会公众公开的个人信息; / Personal information voluntarily disclosed to the public by the individual;
7. 从合法公开披露的信息中收集个人信息的, 如合法的新闻报道, 政府信息公开等渠道; / Collecting personal information from lawfully publicly disclosed information, such as legitimate news reports and government information disclosure channels;
8. 法律法规规定的其他情形。 / Other circumstances stipulated by laws and regulations.

### 三、我们如何使用 Cookie 和同类技术 / How We Use Cookies and Similar Technologies

为确保本平台正常运转, 我们会在您的计算机或移动设备上存储名为 Cookie 的小数据文件。Cookie 通常包含标识符, 站点名称以及一些号码和字符。Cookie 主要的功能是便于您使用本平台服务, 以及帮助网站统计独立访客数量等。 / To ensure the platform operates normally, we will store a small data file called Cookie on your computer or mobile device. Cookies typically contain identifiers, site names, and some numbers and characters. The main functions of Cookies are to facilitate your use of the platform services and help websites count independent visitors.

我们不会将 Cookie 用于本政策所述目的之外的任何用途。您可根据自己的偏好管理或删除

Cookie。您可以清除计算机上保存的所有 Cookie, 大部分网络浏览器都设有阻止 Cookie 的功能。但如果您这么做, 则需要在每一次访问我们的网站时亲自更改用户设置。但您可能因为该等修改, 无法登录或使用依赖于 Cookie 的我们提供的服务或功能。/ We will not use Cookies for any purpose other than those stated in this Policy. You can manage or delete Cookies according to your preferences. You can clear all Cookies saved on your computer. Most web browsers have functions to block Cookies. However, if you do so, you will need to manually change user settings every time you visit our website. However, due to such modifications, you may not be able to log in or use our services or functions that depend on Cookies.

#### 四、我们如何存储您的个人信息 / How We Store Your Personal Information

基于公司业务实际需要, 我们会将您的上述个人信息存储于香港。我们仅在安全, 合法的情况下, 将您的个人信息转移至中国境外。我们将采取措施以确保第三方遵守本隐私政策的承诺, 例如, 审查第三方的隐私和安全标准, 签署适当的合同等。/ Based on the Company's business actual needs consideration, we will store your aforementioned personal information in Hong Kong. We will only transfer your personal information to outside China in a safe and legal manner. We will take measures to ensure third parties comply with the commitments in this Privacy Policy, such as reviewing third parties' privacy and security standards and signing appropriate contracts.

我们承诺, 您的个人信息的存储时间将处于实现您授权使用的目的所必需的最短时间, 我们判断个人信息的存储期限主要依据以下标准: / We promise that the storage time of your personal information will be the shortest time necessary to achieve the purpose for which you authorized use. We determine the storage period of personal information mainly based on the following criteria:

1. 为您提供相关的服务目的, 维护相应服务记录, 以应对您可能的查询, 继续合作或相关投诉; / Providing relevant service purposes, maintaining corresponding service records to address your possible queries, continued cooperation, or related complaints;
2. 您是否同意更长的留存期间; / Whether you agree to a longer retention period;
3. 根据诉讼时效的相关需要; / Based on relevant needs of statute of limitations;
4. 是否存在关于存储期限的其他特别约定或法律法规规定。/ Whether there are other special agreements or legal provisions regarding storage period.

在超出存储期限后, 我们会根据适用法律的要求删除或匿名化处理您的个人信息。/ After the storage period expires, we will delete or anonymize your personal information in accordance with applicable laws.

#### 五、我们如何保护您的个人信息 / How We Protect Your Personal Information

我们非常重视个人信息安全, 并采取一切合理可行的措施, 保护您的个人信息: / We highly value personal information security and take all reasonable and feasible measures to protect your personal information:

1. 我们采取了行业通行的数据保护技术与管理措施,以防止其遭到未经授权的访问,披露,篡改,丢失或毁坏。/ We have adopted industry-standard data protection technologies and management measures to prevent unauthorized access, disclosure, modification, loss, or damage.
2. 我们建立了严格的数据安全管理制度。/ We have established a strict data security management system.
3. 我们对个人信息实行分类管理,采取相应的安全技术措施。/ We implement classified management of personal information and adopt corresponding technical security measures.

## 六、您如何管理您的个人信息 / How You Can Manage Your Personal Information

根据法律法规,您对自己的个人信息享有以下权利:/ According to laws and regulations, you have the following rights regarding your personal information:

1. 查阅权:您有权查阅您的个人信息。/ Right of access: You have the right to access your personal information.
2. 更正权:当您发现我们处理的关于您的个人信息有错误时,您有权要求我们作出更正。/ Right of correction: When you find that the personal information we process about you is incorrect, you have the right to request us to make corrections.
3. 删除权:在某些情况下,您有权要求我们删除您的个人信息。/ Right of deletion: Under certain circumstances, you have the right to request us to delete your personal information.
4. 注销权:您有权注销您的账号。/ Right of cancellation: You have the right to cancel your account.

## 七、未成年人信息收集与使用 / Information Collection and Use Regarding Minors

我们的服务主要面向企业用户,不直接面向未成年人。如果我们发现收集了未成年人的个人信息,我们将采取措施尽快删除相关信息。/ Our services are mainly for enterprise users and are not directly targeted at minors. If we discover that we have collected personal information of minors, we will take measures to delete the relevant information as soon as possible.

## 八、本政策如何更新 / How This Policy Is Updated

我们可能会根据业务需要对本政策进行修改。修改后的政策将在公司网站公布。如您继续使用本服务,则视为接受修改后的政策。/ We may modify this Policy based on business needs. The modified Policy will be published on the Company's website. If you continue to use this service, you shall be deemed to have accepted the modified Policy.

## 九、如何联系我们 / How to Contact Us

如您对本政策有任何疑问,或需要行使您的权利,请联系:client@blueseaglobal.cn / If you have any questions about this Policy, or need to exercise your rights, please contact: client@blueseaglobal.cn

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