



CHINA'S PERSONAL INFORMATION PROTECTION LAW (PIPL) & ITS IMPACT ON MARKETING

中国的《个人信息保护法》(PIPL)
及其对市场营销的影响

An R3 Report

WHAT'S THE BOTTOM LINE ON PIPL?

PIPL 的关键是什么？

China's Personal Information Protection Law (PIPL) is a direct call for marketers and brands to implement first-party data strategies that are compliant with new regulations that protect consumer data. For marketers and advertisers, PIPL demands that companies be transparent in the way they collect, store, and use consumer data and encourages greater alignment for marketers and advertisers operating internationally.

A GDPR-like privacy protection has been long-awaited by China's consumers. Among all countries measured in an October 2021 survey by Cisco, consumers in China felt most positive toward privacy laws. Of those who were aware of the country's 2017 Cybersecurity Law, the vast majority (80%) felt it had a positive impact.

Thanks to PIPL, Chinese consumers will be better protected from potential manipulation by big tech information pushing and digital marketing. In particular, consumers will have the right to refuse decisions being made automatically by algorithms based on collected data. In addition, personal information handlers will not be able to use data mining to differentiate offers between consumers (i.e., charging different prices).

This report looks at what marketers need to do to meet the obligations of PIPL while ensuring overall compliance with China's data security and privacy laws. It also addresses the cost of non-compliance, and considerations for international companies operating within the PRC.

中国的《个人信息保护法》(PIPL)直接呼吁营销人员和品牌实施符合保护消费者数据的新法规的第一方数据战略。对于市场主和营销从业人员来说, PIPL要求公司在收集、储存和使用消费者数据的方式上保持透明, 并鼓励在跨市场国际品牌和提供相关服务的营销人员保持数据安全法实施的协调与一致。

中国的消费者一直在期待像GDPR那样的私隐保护法的出现。在Cisco 于2021年10月进行的调查中, 中国的消费者对私隐保护法的反馈相较于其他国家受采访者最为正面; 而需了解的是, 那些原本对2017年曾出台的网络安全法有所了解的受访者中, 大部份人(80%)觉得其带来了正面的影响。

PIPL的存在将令中国的消费者得到更好的保护, 免受一些大科技公司及数字营销潜在操纵。消费者将有权, 对平台算法从收集到的数据中为他们推送到眼前的选择说, 不。此外, 个人信息的处理者将不能使用数据挖掘为基础提供流动报价。(即对不同对象收取不同的价格)。

本报告将着重于, 市场主如何在在遵守PIPL义务的同时, 亦能确保全面遵守中国的数据安全和隐私法律。本报告还讨论了违规的代价, 以及在中国境内经营的国际公司的需要考量的注意事项

WHAT IS PIPL?

什么是 PIPL?

China's Personal Information Protection Law (PIPL) came into force on November 1st, 2021. The law establishes strict rules on handling the personal data of Chinese citizens and sets immediate compliance requirements.

The Personal Information Protection Law (PIPL) is China's first comprehensive legislation regulating the protection of personal information, and is modeled after the European Union's General Data Protection Regulation (GDPR).

But unlike the GDPR, it only protects consumers' data from the private sector—the government will still have full access.

The PIPL generally applies to all types of data activities (e.g., collection, storage, usage, reorganization, transmission, provision, disclosure and deletion) involving the personal information of data subjects in China, as well as activities outside China that are aimed at providing products or services to individuals in China or analyzing their behavior. Violations of the

PIPL could face penalties of up to RMB 50 million (~US\$7.78 million), 5% of a company's annual revenue and disgorgement of all illegal gains.

中国的《个人信息保护法》(PIPL) 于2021年11月1日开始执行。该法对处理中国公民的个人数据制定了严格的规则，并制定了即时的合规认证。

《个人信息保护法》(PIPL) 是中国首次为规范个人信息保护，并以欧盟《通用数据保护条例》为蓝本而全面订立的法规。

但与GDPR不同，它只保护消费者的数据不受经营实体的管辖，但中国政府仍然有绝对的权限。

PIPL通常适用于涉及中国境内数据主体个人信息的所有类型的数据活动(如收集、存储、使用、重组、传输、提供、披露和删除)，以及在中国境外旨在向中国个人提供产品或服务或分析其行为的活动。违反PIPL的行为可导致面临最高5000万元人民币(约778万美元)的处罚，以及公司年收入的5%和没收所有非法所得的资产。

Definitions 定义

Personal information is any data by which an individual can be identified, such as their name, appearance, email address, IP address, cookie ID, and so on. Personal data doesn't include anonymized data.

个人信息是指可以识别个人的任何数据，如他们的姓名、外表、电子邮件、IP地址、cookie ID等。个人数据不包括匿名数据。

Sensitive personal information includes biometrics, religion, medical and financial information, individual location tracking, as well as information relating to minors under the age of 14.

敏感的个人信息包括生物特征、宗教信仰、医疗及财务信息、个人位置追踪以及与14岁以下未成年人有关的信息。



HANDLING CONSUMER DATA? WHAT ARE YOUR OBLIGATIONS? 在处理消费者数据上您有什么义务?

Consent Requirements and Localization 征求同意及数据本地化

Before collecting or handling someone's personal information, a data handler must obtain the data subject's clear, voluntary and informed consent. Data handlers collecting or handling "sensitive personal information" — a category that includes the data subject's biometrics, religious beliefs, health, finances, geographical location and young children — must, in addition, show the specific purpose and necessity of the data collection and follow certain stringent data protection measures specified in the PIPL.

There are exemptions under the law where prior consent is not required, including:

- Performance of a contractual or statutory duty
- Responding to an emergency involving life and property
- News reporting on a matter of public concern
- Where the information is already found in the public domain

在收集或处理某人的个人信息之前，数据处理者必须获得数据主体的明确、自愿和知情的同意。收集或处理敏感个人信息（包括数据主体的生物特征、宗教信仰、健康、财务、地理位置和幼童等类别）的数据时，处理者必须说明收集数据的具体目的和必要性，并遵循PIPL中规定的某些严格的数据保护措施。

根据法律规定，以下为一些不需要事先同意的例外情况：

- 履行合同或法定义务
- 应对涉及生命和财产的紧急情况
- 对公众关注的问题进行新闻报道
- 信息在公共平台露出或展示

Data Deletion Requirements 对删除数据的要求

The PIPL provides that if the volume of personal information being handled by the data handler reaches certain thresholds, the data localization requirement may be triggered, and the data handler would also be required to appoint an information protection officer to supervise the proper handling and protection of the personal data collected.

Data handlers are required to delete the collected personal data when:

- The purpose of the collection has been achieved
- The information no longer serves its disclosed purposes
- The service is no longer being provided
- The retention period has expired
- The user rescinds consent

PIPL规定，如果数据处理者处理的个人信息量达到一定的水平，就可能触发数据本地化的规定，数据处理者还需要任命一名信息保护官员，确保所收集到的个人数据均能得到恰当处理和保护。

在以下情况下，数据处理者必须删除所收集到的个人数据：

- 收集目的已经达到
- 当信息不再能满足其披露的目的时
- 不再提供服务时
- 当保留期限已过时
- 用户撤回同意
- 当处理过程违反相关法律和法规时

HOW DOES PIPL RELATE TO OTHER DATA & SECURITY LEGISLATION?

PIPL与其他数据和安全法有何关系?

The Data Security Law (DSL) 数据安全法 (DSL)

The PIPL, as a law that specifically regulates the protection of personal information, is essentially an extension of the principles of the Data Security Law in the field of personal information protection.

The Data Security Law, which entered into force on 1 September 2021, is recognized as the general and basic law in the field of data protection in China. In terms of the regulated object, according to Article 3 of this law, "For the purpose of this Law, data shall refer to any record of information in electronic or other form".

The connotation of "data" under this law includes personal information and all other types of information. In terms of regulatory content, the provisions of this law are macro and fundamental in nature and establish a number of basic systems for national data security management. Therefore, from the perspective of legislative intent, the Data Security Law is the basic law in the field of data in China.

作为专门规范个人信息保护的法律，PIPL本质上是在《数据安全法》的原则延伸而成的。

2021年9月1日生效的《数据安全法》被认为是中国数据保护领域的一般法律和基本法。就规范对象而言，根据该法第3条，“本法所称数据，是指任何以电子或者其他方式对信息的记录”。

本法规定的「数据」包括个人信息和所有其他类型的信息。从规范内容上看，这部法律的规定具有宏观性和基础性，并确立了若干国家数据安全管理的根本制度。因此，从立法原意上看，《数据安全法》可算是中国数据领域的基本法。

The Cybersecurity Law 网络安全法

The PIPL and Cybersecurity Laws have different, but complementary, objects of regulation and impose requirements on network security and information protection from different perspectives.

According to Article 76 of the Cybersecurity Law, "network data" is "all kinds of electronic data collected, stored, transmitted, processed and generated through the network", and its regulated object is limited to all electronic data generated in cyberspace, without distinguishing whether it has the attributes of personal information.

The PIPL breaks through the spatial limitation and expands the object of regulation to all data in all carriers and limits its attributes to the scope of personal information.

PIPL和网络安全法的监管对象虽不同但具有互补性，并从不同的角度对网络安全和信息保护订立了规则。

根据《网络安全法》第76条，「网络数据」是指「通过网络收集、存储、传输、处理和产生的各种电子数据」，其规范对象仅限于在网络空间产生的所有电子数据，但并没有清楚区分其属性是否包含个人信息。

PIPL突破了空间限制，将监管对象扩大至所有媒介涉及的全部数据，并将其属性限制在个人信息的范围内。

HOW PIPL COMPARES TO INTERNATIONAL PRIVACY LAW

PIPL与其他国际数据隐私法的对比

Provisions 法规	European Union's GDPR 欧盟的GDPR	California Privacy Rights Act 加州隐私权法	China's PIPL 中国的PIPL
Right to stop processing 限制权	Right to withdraw consent or otherwise stop processing of EU personal information 撤回同意或停止处理欧盟个人信息权利	Right to opt out of selling/sharing personal information; must include opt-out link on website 选择不出售/分享个人信息的权利；网站必须包含选择退出的链接	Right to limit or refuse processing of personal information, with some exceptions; right to withdraw consent 大部份情况下限制或拒绝处理个人信息的权利及撤销同意的权利
Right to stop automated decision-making 停止自动化决策的权利	Right to require a human to make decisions that have a legal effect 作出具有法律效力的决定时要求真人执行的权利	Regulations to govern access and opt-out rights for automated decision-making technology 法规包括监管自动决策技术的访问和确保选择退出权	Right to explanation and right to refuse solely automated decisions with significant impact 在有重大影响自动化决策上有要求解释和拒绝的权利
Right to stop third-party transfer 停止第三方转移的权利	Right to withdraw consent for data transfers involving second purposes of special categories of data 对于涉及特殊类别数据的第二目的的数据转移，有权撤回同意	Right to opt out of selling/sharing personal information to third parties 选择不向第三方出售/分享个人信息的权利	Requirement to obtain explicit consent before transfer to third parties 要求在向第三方转让之前必须获得明确同意
Right to equal services and price 享受平等服务和价格的权利	At most, implicitly required 最多只隐含地要求	Explicitly required 明确规定	Partial. Cannot refuse to provide goods and services if individual refuses to consent (unless necessary) 局部。如果个人拒绝同意，(如非必要)不能拒绝提供商品和服务
Regulator enforcement penalties 监管机构的执法处罚措施	Ceiling of 4% of global annual revenues 全球年收入的4%为上限	No ceiling—\$7,500 per violation 没有上限—每项违规行为罚款7,500美元	Ceiling of 5% of annual revenues or RMB 50m (\$7.8m), plus potentially unlimited penalties to businesses and individuals 最高罚款为年收入的5%或5000万元人民币(780万美元)，加上对企业 and 个人的潜在无限处罚

WHAT'S THE COST OF NON-COMPLIANCE?

违规的代价是什么？

Sanctions for non-compliance with the PIPL depends on whether a company is local or foreign.

For local firms, sanctions include:

- Correction orders, confiscation of unlawful income, provisional suspension, or termination of service.
- CNY 1,000,000 (USD150,000) in personal administrative fines on the person responsible.
- An additional fine of no more than CNY 1,000,000 if correction orders are refused. CNY 50,000,000 (about USD 775,000) in administrative fines or up to 5% of the organization's annual business revenue.

Overseas companies that don't fall into line with the PIPL or harm the national security of China may be:

- Placed on a blacklist.
- Banned from handling the personal information of Chinese citizens.
- The Cyberspace Administration of China (CAC) is responsible for creating and updating the blacklist.

如何制裁违反PIPL守则的公司取决于他们是本土或外资企业。

如果是本土企业，制裁包括：

- 责令改正、没收非法收入、暂时停业，或终止服务
- 对责任人处以100万元人民币 (15万美元) 的个人行政罚款
- 如拒绝改正，可被追加不超过人民币100万元的罚款。另外可被收取50,000,000元人民币 (约775,000美元) 的行政罚款或不超过该组织年营业收入的5%。

不符合PIPL规定或损害中国国家安全的的外资企业可能会被：

- 列入封锁名单
- 禁止处理中国公民的个人信息
- 中国网络空间管理局 (CAC) 负责创建和更新封锁名单。



WHAT PIPL MEANS FOR MARKETERS IN CHINA

PIPL对中国的市场营销人员意味着什么？

1 CONSUMER DATA STORAGE PRACTICES IN CHINA

中国消费者数据储存的实践

With the passage of the Data Security Law and the PIPL, multinational companies with operations in China would be well advised to assess and, if necessary, reconfigure their information technology systems to ensure compliance with PRC law, and to seek the advice of local PRC counsel before exporting data that was initially gathered in China or that is currently stored in China.

随着《数据安全法》和《个人信息保护法》的通过，在中国开展业务的跨国公司最好进行评估并在必要时重新配置其信息技术系统，以确保其符合中国的法律，并在输出在中国收集的数据或目前储存在中国的数据之前，征求中国当地律师的意见。

2 CONSUMER DATA USE AND PROCESS OF CONSENT

消费者数据的使用和获得同意的过程

The PIPL regulates the use of algorithms and other automated systems that have the effect of discriminating against certain classes of consumers. Consent is also required in most circumstances. Multinational companies seeking to market their products and services to prospective Chinese customers using personal data would be prudent to seek legal advice before undertaking such marketing activities.

Brands will also have to reassess the use of third-party data. Platforms and providers will face stricter supervision as to how they obtain and process personal information. Currently, brands and marketers draw on big tech platforms like Alibaba and Tencent with access to a wealth of customer data, which in turn allows them to develop more specific content and products. Brands need to think about whether those activities are legal under the new law or whether it will be associated with unnecessary items in the future.

PIPL对具有歧视某类别消费者的算法和其他自动算法的使用进行监管，在大部份情况下需得到同意。跨国企业如果想利用个人数据向潜在的中国客户推广其产品和服务，最好在在进行此类营销活动之前征询法律意见。

品牌也应该重新评估对第三方数据的使用。毕竟各个平台和供应商在如何获得和处理个人信息方面将面临更严格的监督。目前，品牌和营销人员利用阿里巴巴和腾讯等大型科技平台获得了大量客户数据，这也反哺了产品研发和内容营销的方向。品牌需要考虑这些营销战役在新的法律下是否合法，或者它是否会在未来引起不必要的麻烦。

3 CONSUMER DATA TRANSFER OUTSIDE OF CHINA 中国消费者数据的输出

A particular pain point for brands will be a restriction on data transfer outside the country. Western brands have generally analyzed data collected in China in their U.S. and EU headquarters. The PIPL makes data transfers subject to security assessments and certification by Chinese cyberspace authorities, an interaction that brands will want to avoid, says Omer Tene, chief knowledge officer at the International Association of Privacy Professional (IAPP).

One solution is to build a local data management platform and work out how to keep and analyze data in the country. Brands are lagging behind in preparation. There has been a long observation period for brands, with a lot of focus on GDPR and on the California Consumer Privacy Act, but there has been absolutely no focus on China.

对于部分品牌将面临国际数据迁移的难题。西方品牌的总部，通常在其美国或欧盟，并在此处理分析在中国收集到的营销数据。国际隐私专业协会 (IAPP) 的首席知识官 Omer Tene 说，PIPL 的出现令数据传输必须经过中国网络空间当局的安全评估和认证，而这是各品牌均希望避免的。

其中一个解决方案是建立一个本地数据管理平台，并研究如何在国内保存和分析数据。各品牌的准备工作已滞后 – 他们对 GDPR 和加州消费者隐私法案已观察了一段不短的时间。

4 LOCAL EXPERTISE AS A LEGAL IMPERATIVE 咨询当地的专家意见亦是法律上的义务

In the past, subject to state secrecy and data privacy screening by qualified Chinese lawyers, multinational companies with operations in China were able to respond to foreign regulators' subpoenas and requests for information directly, without first obtaining the approval of the Chinese authorities, even if the requested data concerned Chinese individuals or the multinational companies' China-based operations.

Similarly, in connection with foreign litigation proceedings, multinational companies were able to collect responsive documents in China and produce them to opposing counsel in discovery without the PRC authorities' prior approval.

This is no longer the case under the newly enacted DSL and PIPL. Together with other laws that the PRC authorities enacted since 2018 – for example, the Criminal Judicial Assistance Law and Article 177 of the Chinese Securities Law – companies seeking

to comply with U.S. and other foreign regulators' information requests, or fulfill their discovery obligations in ongoing U.S. litigation, should consult Chinese counsel before transmitting such information overseas.

过去，受到中国职业律师就国家保密和数据隐私条款的审查下，在中国开展业务的跨国企业能够直接回应外国监管机构的传票和信息请求，即使所请求的数据涉及中国个人或跨国公司在中国的业务，亦无需先获得中国当局的批准。同样，在国外的诉讼程序中，跨国企业能够在中国收集相应的文件，并在发现问题时向对方律师提供这些文件，而不需要中国当局的事先批准。

在新颁布的 DSL 和 PIPL 下做法和以前大不相同。加上中国当局自 2018 年以来颁布的其他法律，例如《刑事司法协助法》和《中国证券法》第 177 条 – 公司若想遵守美国和其他外国监管机构的信息要求，或在正在进行的美国诉讼中履行其证据披露义务，应在向海外传送此类信息之前咨询中国律师。

5 AN OPPORTUNITY TO BUILD CONSUMER RELATIONSHIPS 与消费者建立关系的机遇

In a survey published by the Luxury Institute in June 2020, affluent Chinese consumers showed a greater propensity than Americans to share data, especially in exchange for more personalized services. A new data relationship between brand and consumer will emerge: millennials and Gen-Zs are ready and willing to share their info but they are fully aware of the value of their personal data to companies.

在美国奢侈品协会2020年6月发布的一项调查中，富裕的中国消费者比美国人更倾向于分享数据，尤其是为了换取更多的个性化服务。品牌和消费者之间的数据关系将会由此开展：千禧一代和Z世代十分愿意分享他们的信息，但他们亦充分意识到他们的个人数据对品牌的价值。

CASE STUDY

Case study 案例研究

Max Mara & BMW

MaxMara
STUDIO

In a recent case, brands including Max Mara and BMW were criticised for their use of facial recognition tech. BMW said Chinese dealers using the technology are not controlled by the company, while Max Mara said the cameras were used to monitor customer flow in stores and did not collect personal information, the AP News reported. According to a 2019 survey, a large majority of Chinese consumers are worried about facial recognition data being leaked and say they prefer traditional ID methods. They also consider consumer information confidentiality and data protection as important facets of brands' corporate social responsibility – even more so than Indian and Australian peers.

在最近的一个案例中，包括Max Mara和BMW在内的品牌因使用面部识别技术而受到批评。美联社新闻报道说，BMW公司表示，使用该技术的中国经销商并不受他们控制；而Max Mara则表示，这些摄影镜头是用来监控商店里的顾客流量，并没有收集个人信息。根据2019年的一项调查，绝大多数中国消费者担心面部识别数据被泄漏，并表示他们更喜欢传统的身份识别方法。在消费者信息保密和数据保护方面，中国的消费者比印度和澳大利亚的消费者更为重视 – 他们认为这是品牌作为企业应尽的社会责任。

WHAT PIPL MEANS FOR PLATFORMS IN CHINA?

PIPL对中国的平台来说意味着什么?

A Change in User Active Rate Privacy Clauses 用户活跃率隐私条款的变化

All instant messaging apps in China installed more than 100 million times have updated their privacy clauses since 2020.

自2020年以来，中国所有下载次数超过1亿次的即时通讯应用程序都更新了其隐私条款。

Algorithms Might Be Affected 演算法可能会受到影响

Algorithms 算法		Logic 逻辑	Application 应用	Pros 好处	Cons 坏处
Social relationship based 以社交关系为基础		Based on social networks such as mutual acquaintances, one-way followers, and common followers of a certain tag, the similarity between users is calculated to make recommendations. 以社交网络为基础，如相互认识的人、单向追随者和某一标签的共同追随者，计算出用户之间的相似度来进行推荐。	WeChat video channel: friend likes recommendation, fission 微信视频号：朋友圈推荐，裂变	Increase trust 增加信任度 Solve cold start problems 解决冷启动的问题	Relatively low accuracy 准确度相对较低 Easy to touch the user privacy boundary 容易触及用户隐私边界
User attributes based 以用户属性为基础		Calculate the similarity between users, such as age, gender and other basic characteristics, and recommend what user A likes to user B. 计算用户之间的相似度，如年龄、性别和其他基本特征，并将用户A喜欢的东西推荐给用户B	Lookalike enlarges the audience 类似特征扩大了受众者范围	No dependence on user behavior 不依赖用户行为 No cold start issues 没有冷启动问题	Relatively low accuracy 准确度相对较低
Historical user preference data based 以用户的历史偏好数据为基础	Similarity of user content preferences based 以用户内容偏好的相似度为基础	Based on the data of users' historical preferences, we calculate the similarity between users and recommend items liked by similar users to each other. 以用户的历史偏好数据为基础，我们计算出用户之间的相似度，并将相似用户喜欢的物品推荐给他们	Guess what you like, the user who bought this item also bought 您可能会喜欢...；购买此商品的还购买了	Discover the potential interests of users to recommend personalization 发掘用户的潜在兴趣，推荐个性化服务 Ability to handle more complex scenarios 有能力处理更复杂的情况	Cold start problems 冷启动问题 Too much reliance on historical user preference data 过分依赖用户历史偏好的数据 Poor quality of initial recommendations 首次建议的质量不高
	Similarity of user preferences based 以用户物品偏好的相似性为基础	Based on the data of users' historical preferences, we calculate the similarity between items and recommend similar items based on users' historical preferences. 以用户的历史偏好数据为基础我们计算物品之间的相似度，并根据用户的偏好历史推荐相似物品			
Popularity based 以受欢迎程度为基础		Based on the interaction data of the content, we calculate the most popular content and recommend it to users. 根据内容的互动数据，计算出最受欢迎的内容并推荐给用户	Hotlist, Douban list, Weibo real-time hot search 热搜、豆瓣排行榜、微博实时热搜	Application of Crowd Psychology 应用群众心理学 Solve the cold start problem 解决冷启动问题 Improve retention of new users 提高新用户的留存率 Maintain the activity of old users 保持老用户的活跃度	Difficult to guarantee the quality of content 难以保证内容的质量 Inability to meet individual needs 无法满足个人需求
Content tags based 以内容标签为基础		Recommend different items under the same tag to users by typing the corresponding tags according to the attribute characteristics of the content 根据内容的属性特征，通过输入相应的标签，向用户推荐同一标签下的不同项目	Social media platforms recommend similar users based on their preferences and tags 社交媒体平台根据用户的喜好和标签推荐类似的用户	Solve the cold start problem 解决冷启动问题 New content can also be recommended 可以推荐新的内容	Content quality relies on the accuracy of tags 内容质量取决于标签的准确性 Content tagging lacks feedback from users 内容标签缺乏来自用户的反馈
Association rule based 以关联规则为基础		Mining association rules from historical data to make recommendations based on the relevance of content to content. 从历史数据中挖掘关联规则，根据内容与内容的关联性进行推荐	E-commerce platforms recommend soccer to users who buy soccer shoes 电商平台向购买足球鞋的用户推荐足球	High conversion rate 高转换率 Discover new points of interest for users 发现用户的新兴趣点	Cold start problems 冷启动问题 Hot items over recommended 过度建议热门项目
Situational awareness based 以态势感知为基础		Recommendations based on the time, place, date, mood and other contexts in which the user enters the system. 基于用户进入系统的时间、地点、日期、心情和其他背景作出推荐	E-commerce platforms recommend clothes based on season 电子商务平台根据季节推荐服装	Real Time 实时性 Time Diversity 时间分集	The recommendation range is relatively narrow 推荐范围相对较窄 Multi-dimensional contexts are complicated to calculate 多维语境的计算较复杂

HOW R3 CAN HELP



Establish a Personal Information Playbook 建立个人信息手册

For long-term, cost-effective compliance, establish dedicated roles and responsibilities, detailed privacy management policies and procedures, a playbook for personal information protection impact assessments and an audit program – all supported by technology solutions.

为了长期、合规及高成本效益高的，建立明确的专有职能和职责、详细的隐私管理政策和程序，清晰的隐私管理政策和程序、个人信息保护影响评估和审计程序——所有这些都由技术解决方案支持。



Conduct Impact Assessments 进行影响评估

Perform and document personal information protection impact assessments as mandated for high-risk activities, including but not limited to cross-border data transfers. Given existing ambiguities, err on the side of too many rather than too few assessments.

照规定对高风险活动进行个人信息保护影响评估，包括但不限于跨境数据传输。考虑到现有的模糊性，多进行评估较为保险。



Identify Exposure 辨识暴露的风险

Are you handling Chinese residents' personal information? If so, assess and document these activities. Cover the full data-use life cycle, note your legal basis for these activities and locate relevant documents. Determine whether you may be deemed a critical information infrastructure operator (CIIO) or if you process large enough volumes of data to face potential additional compliance requirements.

您是否正在处理中国公民的个人信息？如果是，请评估并记录这些活动 – 需涵盖整个数据使用周期，注意您这些营销活动的法律依据，并找到相关文件。确定您是否可能被视为关键信息基础设施运营商 (CIIO)，或者您处理的数据量是否足以令您面临潜在的额外合规要求。



Assess the Gaps 漏洞评估

Assess compliance protocols in light of new rules, then identify risks and potential penalties to set priorities for remediation. Pay special attention to your workforce, as the new regulations and the potential penalties for individuals have led to shortages in trained data protection officers.

根据最新的规则评估合规协议，确定风险和潜在的处分，以确定补救的优先次序。同时请多加留意您的员工，新的法规和对个人的潜在惩罚已经造成不少训练有素的数据保护官员的流失。



Remediate and Enhance 补救及加强

As you close current compliance gaps in line with risk-based priorities, act to prevent future shortfalls, too. Enhance management practices, workforce capabilities and technology tools for personal information handling. Where ambiguities remain, consider both government intent and global leading practices.

当您根据风险的优先事项弥补当前的合规性差距时，也要采取行动防止未来发生的状况。加强对个人信息处理的管理实践、劳动力能力和技术工具。如果仍然存在模糊不清的地方，请考虑政府的意图和参考全球良策。

ABOUT R3

OUR REASON FOR BEING

In a word, we are about transformation. R3 was established in 2002 in response to an increasing need from marketers to enhance their return on marketing, media and agency investments, and to improve efficiency and effectiveness.

We want to help CMOs make marketing accountable.

OUR BACKGROUND

We've worked with more than one hundred companies on global, regional and local assignments to drive efficiency and effectiveness.

We have talent based in the US, Asia Pacific and Europe and partners in LATAM and Africa.

Through global work for Samsung, Coca-Cola, Johnson & Johnson, Visa, Unilever, and others, we have developed robust benchmarks and process targets for more than 70 countries.



WHAT WE DO

We are an independent transformation consultancy hired by CMOs to make their marketing more measurable and accountable to business impact.



HOW WE DO IT

- We invest in the best talent, bringing in senior leaders from marketing, agency and analytic backgrounds.
- We're independent. Because we're not your marketing team or agencies, we're empowered to be honest and transparent.
- We use external benchmarks. We have proprietary data pools to inform our in-depth analysis.
- Since 2002, we've interviewed more than 2,000 marketers about their agency relations.
- Since 2006, we've spoken to more than 80,000 consumers in China's top-twenty cities and continue to do so every three months.
- We have co-developed software to measure agency and media performance.
- Each month, we exclusively track over 500 agency new business wins, as well as 100's of deals in the marketing M&A space.
- We have insight into global best practice. We work with companies who want to do best-in-class marketing across diverse categories and geographies.
- We authored the book "Global CMO" about marketers leading Digital Transformation around the world.
- We maintain an ongoing database of media costs for key markets.

DRIVING TRANSFORMATION FOR MARKETERS AND THEIR AGENCIES

RETURN ON AGENCIES

We help marketers find, pay and keep the best possible agency relationships – covering Creative, Media, PR, Digital, Social, Performance, Event, Promotions and CRM.

We take the lead on improving the Integration process through proprietary software and consulting.

RETURN ON MEDIA

We offer professional analysis of the media process, planning and buying with proprietary benchmarks and tools to set and measure performance.

We conduct financial audits to validate and benchmark transparency.

RETURN ON INVESTMENT

Using a bespoke and proprietary methodology, we help benchmark and provide insights into how your digital strategies perform in your category and across categories.

CONTACT US

NORTH AMERICA

New York

79 Madison Ave
8th Floor
New York, NY 10016
T +1 646 416 8088

LATIN AMERICA

São Paulo

Rua Jerônimo da Veiga
428 – conjunto 21
São Paulo, Brazil
T +55 11 3071 0678

EUROPE

London

68-80 Hanbury St, London
E1 5JLT
T +44 20 7998 9588

Madrid

Calle Goya, 59
Madrid 28001
T +34 91 702 1113

ASIA PACIFIC

Beijing

A1906, Chaowai SOHO
No.6B Chaowai Street
Chaoyang District
Beijing 100020, China
T +8610 5900 4733
F +8610 5900 4732

Shanghai

2E, Apollo Building
1440 Yan'an Road
Jing An District
Shanghai 200040, China
T +8621 6212 2310

Hong Kong

23/F, One Island East
18 Westlands Road
Hong Kong
T +852 3750 7980

Singapore

1 Keong Saik Road
Singapore 089109
T +65 6805 4050

Sydney

Level 26, 1 Bligh Street
Sydney, NSW 2000

SOCIAL MEDIA

 www.rthree.com
Website

 weibo.com/r3china
Weibo

 twitter.com/R3WW
Twitter

 facebook.com/r3worldwide
Facebook

 linkedin.com/company/r3
LinkedIn





www.rthree.com