British Council China Mainland Version

Rules on the Processing of Personal Information of Minors Under the Age of Fourteen

Last Updated: 24 August 2026
Effective Date: 31 August 2026

The British Council (hereinafter referred to as the "British Council", the "Council", "we", "us", or "our") attaches great importance to the protection of the personal information of minors under the age of fourteen (hereinafter referred to as "children").

In accordance with the requirements of the Personal Information Protection Law of the People's Republic of China, the Law of the People's Republic of China on the Protection of Minors, the Provisions on the Cyber Protection of Children's Personal Information, and other applicable laws and regulations, these Rules are formulated to protect children's personal information rights and interests and regulate activities involving the processing of children's personal information.

Children's personal information constitutes sensitive personal information. We will adopt strict protection measures in accordance with the requirements of applicable laws and regulations.

These Rules supplement the **British Council China Mainland Privacy Policy** and apply where we process the personal information of minors under the age of fourteen. Matters not addressed herein shall be governed by the **British Council China Mainland Privacy Policy**.

Article 1. Special Statement

If you are a child under the age of fourteen, please read these Rules under the supervision of your guardian and access relevant services only after obtaining your guardian's consent.

If you are a child's guardian, in order to protect your child's lawful rights and interests, please carefully read and fully understand the contents of these Rules.

We only process children's personal information where we have obtained your consent or where another lawful basis prescribed by laws and regulations applies.

If you do not agree to the contents of these Rules or refuse to provide information necessary for the provision of relevant services, the relevant child may be unable to participate in examinations, programmes, activities, or use relevant digital platform services.

We recommend that you strengthen your guidance and supervision regarding the protection of your child's personal information. We encourage you to help your child enhance awareness of personal information protection and avoid providing personal information to others without your consent.

Article 2. Scope of Application

These Rules apply to activities involving the processing of children's personal information in the course of the British Council's business operations within the People's Republic of China, including examination services, educational programmes, cultural exchange activities, digital services, and other business scenarios.

Please note that most of the British Council's products and services are not specifically designed for children under the age of fourteen. However, in certain educational, examination, cultural exchange, and school partnership programmes, we may lawfully process children's personal information.

Unless otherwise specifically agreed, in most business scenarios we are unable to identify whether a user is a child and therefore process relevant personal information in accordance with the **British Council China Mainland Privacy Policy**. If we become aware that a relevant individual is a child, we will apply these Rules and adopt corresponding protective measures.

Article 3. Scope of Children's Personal Information

For the purposes of these Rules, children's personal information refers to all kinds of information relating to a child that is recorded electronically or by other means and that identifies or can identify a child, excluding information that has been anonymised.

As a child's guardian, please pay attention to protecting the child's personal information before and during any processing activities in order to avoid disclosing personal information beyond what is necessary.

Depending on the business scenario, the information we may collect, and process includes identity information, contact information, guardian information, examination and educational information, activity participation information, device and network usage information, and other related information.

Article 4. Purposes for Processing Children's Personal Information

We may process children's personal information for the following purposes:

- Providing examinations, education, cultural exchange and related services;
- Conducting identity verification, eligibility review and security management;
- Responding to enquiries, providing customer support and service notifications;
- Fulfilling obligations required by laws and regulations;
- Improving products and services, wherever possible through the use of anonymisation and de-identification measures.

Article 5. Guardian Consent

Where required by applicable law, we will obtain consent from the child's guardian.

We may collect additional information relating to the guardian, including identity information, proof of guardianship, contact details, or other information that can verify the guardian's intention. We will continue processing the child's personal information only where guardian consent has been obtained.

For circumstances requiring separate consent, including the processing of children's sensitive personal information, the provision of children's personal information to third parties, or the cross-border transfer of children's personal information, we will obtain the guardian's separate consent in accordance with the law.

Guardians have the right to withdraw their consent; however, such withdrawal may affect the provision of relevant services.

Where there are material changes to the purpose of processing, processing methods, categories of information processed, or recipients of the information, we will provide a new notice to the guardian and obtain the corresponding consent.

If we discover that we have collected a child's personal information without obtaining guardian consent, we will take appropriate measures in accordance with applicable laws and regulations, including ceasing the relevant processing activities and handling the relevant information as required under applicable law.

Article 6. Entrusted Processing and Sharing with Third Parties

We may entrust service providers to process children's personal information on our behalf or share children's personal information with third parties within the scope permitted by law, and we will require them to adopt strict protection measures.

Where separate consent is required by law, we will obtain the guardian's separate consent in accordance with applicable legal requirements.

Article 7. Cross-Border Transfer of Children's Personal Information

In principle, personal information collected and generated within the People's Republic of China will be stored within the territory of the People's Republic of China.

However, as an international cultural and educational organisation, we may provide children's personal information to overseas affiliated organisations, service providers, or partners where required for business purposes.

For any cross-border transfer of children's personal information, we will fulfil the relevant compliance obligations in accordance with applicable laws and obtain the guardian's separate consent where required by law.

Guardians have the right to be informed of the overseas recipient's name, contact details, purpose of processing, processing methods, and the means by which personal information rights may be exercised.

Article 8. Retention of Children's Personal Information

We will retain children's personal information only for the period necessary to fulfil the processing purposes and will delete or anonymise such information upon expiry of the applicable retention period in accordance with the law.

Exceptions apply where laws and regulations provide otherwise, or where continued retention is necessary for the performance of a contract, compliance with legal obligations, or the resolution of disputes.

Article 9. Security Protection Measures

Access to children's personal information is strictly controlled in accordance with the principles of "business necessity" and "least privilege".

The British Council will adopt technical and organisational measures appropriate to the sensitivity of children's personal information in accordance with applicable laws, regulations, and cybersecurity requirements.

Article 10. Handling of Security Incidents

Where a security incident involving, or potentially involving, the leakage, tampering, loss, or other compromise of children's personal information occurs, we will take response measures in accordance with applicable legal requirements and promptly notify affected children and their guardians.

Please refer to Section 5, "How We Protect Your Personal Information Security", of the **British Council China Mainland Privacy Policy** for detailed information about how we handle personal information security incidents.

Article 11. Rights of Children and Guardians

Guardians have the right to exercise relevant rights on behalf of children in accordance with the law.

Please refer to Section 6, "Your Rights", of the **British Council China Mainland Privacy Policy** for detailed information regarding how we respond to data subjects' personal information rights requests.

Article 12. Updates to These Rules

We may update these Rules where there are changes to applicable laws and regulations, business models, or activities involving the processing of children's personal information.

Where updates involve material changes to the purposes of processing, processing methods, categories of information processed, recipients of shared information, or other significant matters, we will provide a new notice to guardians and obtain the corresponding consent in accordance with applicable legal requirements.

Article 13. Contact Us

The British Council has designated a person responsible for personal information protection who oversees the protection of children's personal information and has established a dedicated management mechanism for children's personal information.

If a guardian has any questions, complaints, or wishes to exercise any relevant rights relating to the protection of a child's personal information, the guardian may contact us through the details below.

Email: CNDisclosures@britishcouncil.org