

Structure Therapeutics —Data Privacy and Protection Policy
Structure Therapeutics — 数据隐私与保护政策

Policy Name 政策名称	Data Privacy and Protection Policy 数据隐私与保护政策	
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Company 公司	Structure Therapeutics Inc.	

1. Purpose 宗旨

Structure Therapeutics Inc. (together with its subsidiaries and affiliates, the “**Company**”) is entrusted with Personal Data from patients, employees, contractors, and other Data Subjects. The Company collects, stores, uses, and, where necessary, discloses such data to support its global operations, regulatory submissions (including FDA filings and drug approval processes), academic and clinical research, potential business collaborations, and other legitimate business needs. Maintaining the confidentiality, integrity, and availability of these data is essential to preserving trust and to the lawful conduct of the Company’s activities.

Structure Therapeutics Inc.（连同其子公司及关联公司，下称“**公司**”）受患者、员工、派遣工及其他数据主体委托，处理其个人数据。公司收集、存储、使用并在必要时披露此类数据，以满足其全球运营、注册申报（包括FDA备案及药物审批流程）、学术与临床研究、潜在业务合作以及其他合法业务需求。维护上述数据的机密性、完整性与可用性，对于维系信任及确保公司合法开展业务至关重要。

Protecting Personal Data, Human Genetic Resources (“**HGR**”), and Records is both a legal requirement and a core value for the Company. The Company has implemented this Data Privacy and Protection Policy (the “**Policy**”) for the purpose of ensuring compliance with all Applicable Law, including but not limited to Personal Information Protection Law of the PRC, the Data Security Law of the PRC, the Cybersecurity Law of the PRC, China HGR Regulation, the EU General Data Protection Regulation (GDPR), and other applicable national or regional data protection standards.

保护个人数据、人类遗传资源（“**HGR**”）及记录，既是公司的法定义务，也是公司恪守的核心价值观。公司实施本《数据隐私与保护政策》（下称“**政策**”），旨在确保遵守所有适用法律，包括但不限于《中华人民共和国个人信息保护法》、《中华人民共和国数据安全法》、《中华人民共和国网络安全法》、中国人类遗传资源法规、《欧盟通用数据保护条例》（GDPR）以及其他适用的国家或地区数据保护标准。

By following this Policy, the Company ensures that Personal Data, HGR, and Records are safeguarded, trust is maintained, and compliance obligations are met worldwide.

通过遵循本政策，公司可确保在全球范围内对个人数据、人类遗传资源及记录予以保护、维系信任并履行合规义务。

2. Applicability 适用范围

This Policy applies to the Company and all Company Personnel. Third parties who perform services for and on behalf of the Company, together with their staff or consultants, are expected to embrace standards of conduct consistent with this Policy.

本政策适用于公司及公司全体人员。为公司提供服务以及代表公司提供服务的第三方，连同其员工或顾问，均须遵循与本政策要求相一致的行为准则。

Company Personnel, business partners and consultants of the Company in Mainland China, as well as anyone who is or will be involved in activities related to the collection, preservation, utilization, and external provision of HGR Materials and/or HGR Data derived from participants in Mainland China, should review (i) **Section 5** of this Policy and (ii) the **China HGR Management Addendum** attached at the end of this Policy (Exhibit B) for additional information and guidance on the Company's HGR management.

在中国大陆境内的公司人员、业务伙伴、顾问，以及任何正在或将要参与采集、保藏、利用、对外提供源自中国大陆参与者的人类遗传资源材料和/或人类遗传资源信息相关活动的人员，均应仔细阅读（i）本政策**第5条**以及（ii）本政策末尾随附的《中国人类遗传资源管理附录》（附件B），获取关于公司人类遗传资源管理的更多信息和指导。

Where the most up-to-date Applicable Law imposes stricter requirements than this Policy, the Company and all Company Personnel shall comply with Applicable Law. This Policy reflects the Company's commitments and standards for handling Personal Data, HGR and Records and does not create contractual rights.

如果最新的适用法律的规定相较本政策更为严格，公司及所有公司人员均应遵循适用法律的规定。本政策旨在阐明公司处理个人数据、人类遗传资源及记录的承诺与标准，并不创设合同权利。

Company may, in accordance with Applicable Law, adopt and implement jurisdictional requirements set out in the Jurisdictional Addendum attached to this Policy in **Exhibit C**, which establish the specific obligations that apply to the Processing of Personal Data in those jurisdictions. If any provision of the main body of this Policy is inconsistent with a provision of the applicable Jurisdictional Addendum, the latter will prevail but the remaining provisions of the main body of this Policy shall continue to apply. 公司可以依据适用法律，采纳并实施本政策**附件C**中所附的司法管辖区附录中规定的司法管辖区要求，这些要求确立了在这些司法管辖区处理个人数据时适用的具体义务。如果本政策正文的任何要求与适用的司法管辖区附录的要求不一致，则以司法管辖区附录为准，但本政策正文的其余要求仍应适用。

3. Definitions and Abbreviation 定义和缩写

For the purposes of this Policy, the following definitions and abbreviations apply, unless otherwise defined in an applicable Jurisdictional Addendum.

本政策中适用以下定义和缩写，除非在适用的司法管辖区附录中有其他定义。

Terminology & Abbreviation 术语和缩写	Definition 定义
Applicable Law 适用法律	means all applicable laws, rules, orders, ordinances, regulations, statutes, requirements, codes and executive orders of any governmental or judicial authorities, each as amended, extended or re-enacted from time-to-time, which shall include but not limited to Personal Information Protection Law of the PRC, the Data Security Law of the PRC, the Cybersecurity Law of the PRC, China HGR Regulation, the EU General Data Protection Regulation (GDPR),

	and other applicable national or regional data protection standards. 指任何政府或司法机构颁布、不时修订、延长或重新颁布的所有适用法律、法规、法令、条例、规章、成文法、规定、法典及行政命令，包括但不限于《中华人民共和国个人信息保护法》、《中华人民共和国数据安全法》、《中华人民共和国网络安全法》、中国人类遗传资源法规、《欧盟通用数据保护条例》（GDPR）以及其他适用的国家或地区数据保护标准。
China HGR Regulation 中国人类遗传资源法规	means the Biosecurity Law of the PRC, Administrative Regulation on Human Genetic Resources of the PRC, Implementing Rules for the Administrative Regulation on Human Genetic Resources of the PRC, and any similar regulations on human genetic resources, each as promulgated, amended or re-enacted from time to time. 指《中华人民共和国生物安全法》、《中华人民共和国人类遗传资源管理条例》以及《中华人民共和国人类遗传资源管理条例实施细则》，以及任何其他关于人类遗传资源的类似法律法规，均包括其经不时颁布、修订或重新颁布的各个版本。
Chinese Entity 中方单位	means scientific research institutes, institutions of higher education, medical institutions or enterprises, without foreign elements (i.e. being established or controlled by foreign organizations or individuals). The organizations with actual control by Chinese capital established in Hong Kong/Macao shall be deemed as Chinese Entities. 指不含外资成分（即并非由外国组织或个人设立或控制）的科研机构、高等院校、医疗机构或企业。设立于香港/澳门、由中资实际控制的组织，应视为中方单位。
Company 公司	means Structure Therapeutics Inc., together with its subsidiaries and affiliates 指 Structure Therapeutics Inc. 及其子公司与关联公司。
Company Personnel 公司人员	means trustees, directors, officers, members of board committees, employees of the Company, trainees, volunteers, observers, contractors, temporary staff and any other persons who are formally associated with the Company for the purpose of overseeing or engaging in any activity, operation or undertaking of the Company or for or on behalf of the Company that involves the creation or use of Records. 指公司的理事、董事、高级管理人员、董事会委员会成员、雇员、实习生、志愿者、监察员、派遣工、临时工，以及任何其他与公司有正式关联、旨在监督或参与公司任何涉及记录创建或使用的活动的人员，或者为了公司或代表公司参与或监督任何涉及记录创建或使用的活动的人员。
Confidential Records 保密记录	means Records that for one or more reasons should only be disclosed to specific people or groups. 指由于一项或多项原因，仅可向特定个人或群体披露的记

	录。
CRO 合同研究组织	means Contract Research Organization, a third-party organization engaged by the Company to provide outsourced clinical research and development services and related services on a contract basis. 指合同研究组织，即公司以合同形式聘请的、按合同约定提供外包临床研发及相关服务的第三方组织。
Data Controller (Controller) 数据控制者（控制者）	means a natural or legal person, public authority, agency, or other body that, alone or jointly with others, determines the purposes and means of the processing of Personal Data. 指单独或与他人共同确定处理个人数据的目的和方式的自然人、法人、公共机关、机构或其他组织。
Data Processor (Processor) 数据处理者（处理者）	means a natural or legal person, public authority, agency, or other body which processes Personal Data on behalf of the Data Controller. 指代表数据控制者处理个人数据的自然人、法人、公共机关、机构或其他组织。
Data Subject(s) 数据主体	means a natural person who can be identified, directly or indirectly, 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 the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. 指通过姓名、身份证号、位置数据、在线标识符等识别信息，或通过身体、生理、遗传、心理、经济、文化或社会身份等一个或多个特定要素可以直接或间接识别的自然人。
Foreign Entity 外方单位	means organizations and institutions established or actually controlled by foreign organizations or individuals. 指由外国组织或个人设立或实际控制的组织和机构。 <i>Note: The subsidiaries of the Company, even established and registered in Mainland China, will also be regarded as Foreign Entities due to the foreign investor base.</i> 注：公司的子公司，即使在中国大陆境内设立并注册，因其外资投资背景，仍应视为外方单位。
HGR 人类遗传资源	means human genetic resources. 指人类遗传资源。
HGR Materials 人类遗传资源材料	means genetic materials such as organs, tissues and cells that contain hereditary substances such as human genomes and genes. 指含有人类基因组、基因等遗传物质的遗传材料，例如器官、组织、细胞等。 <i>Note: PRC Regulatory Authority may publish guidelines and FAQs from time to time to narrow or expand the covered materials. In case of doubt, please reach out to the Legal and Compliance Department.</i> 注：中国监管机构可能不定期发布指南或常见问题解答，对该材料的范围予以缩限或扩大。如有疑问，请咨询法律合规部门。 Pursuant to the PRC Regulatory Authority's FAQs as of the date of this Policy, examples of HGR Materials include all types of cells, whole blood, tissue/tissue sections, semen, cerebrospinal fluid, pleural effusion/ascites, blood/bone marrow smears, hair (with hair

	follicles), etc. 根据截至本政策发布之日中国监管机构公布的常见问题解答，人类遗传资源材料包括：各类细胞、全血、组织/组织切片、精液、脑脊液、胸腔积液/腹水、血液/骨髓涂片、毛发（带毛囊）等。
HGR Data 人类遗传资源信息	means information materials such as human genes and genome data generated from HGR Materials, excluding clinical data, image data, protein data and metabolic data to the extent it does not contain any genetic information (as would be expected). 指利用人类遗传资源材料产生的人类基因、基因组数据等信息资料，通常不包括临床数据、影像数据、蛋白质数据及代谢数据，除非上述四类数据中包含遗传信息。 <i>Note: Regulatory Authority may publish guidelines and FAQs from time to time to narrow or expand the covered data. In case of doubt, please reach out to the Legal and Compliance Department.</i> 注：监管机构可能不定期发布指南或常见问题解答，对该数据的范围予以缩限或扩大。如有疑问，请咨询法律合规部门。 Pursuant to the Regulatory Authority's FAQs as of the date of this Policy, examples of HGR Data include information relating to genes, genomes, transcriptomes, epigenomes, and ctDNA and other nucleic acid biomarkers, as well as associated disease or ethnographic indicators. 根据截至本政策发布之日监管机构公布的常见问题解答，人类遗传资源信息包括与基因、基因组、转录组、表观基因组、ctDNA及其他核酸生物标志物相关的信息，以及相关的疾病或人种志学的指标。
Investigation 调查	means (i) an investigation pertaining to Company or Company Personnel where their relationship to or activities at Company may bear on the investigation, which includes but is not limited to an investigation by or on behalf of: any government entity; any quasi-governmental agency; any regulatory or legal oversight authority; Company itself; or a private person or entity relating to Company or Company Personnel that could lead to Litigation or the filing of a complaint with Company, a government entity, quasi-governmental agency or regulatory or legal oversight authority; or (ii) any other investigation where Company or Company Personnel hold Records that are relevant to such Investigation. An Investigation includes not only an existing Investigation but also includes situations where Company or Company Personnel have notice, should know or reasonably can anticipate a future Investigation. 指（i）涉及公司或公司人员的调查，且其与公司的关系或在公司内的活动可能与调查有关，包括但不限于由以下主体进行或代表以下主体进行的调查：任何政府实体；任何准政府机构；任何监管或法律监督机构；公司自身；或与公司或公司人员相关、可能引发诉讼或向公司、政府实体、准政府机构、监管或法律监督机构提起投诉的私人或实体；或（ii）公司或公司人员持有相关记录的任何其他调查。调查不仅包括已存在的调查，还包括公司或公司人员已获通知、应当知道

	或能够合理预见将会引起调查的情形。
Legal Hold 法定数据留存指令	means a written (which may be by email or other electronic means) directive issued by the Company's Legal and Compliance Department directing the retention of Records related to an Investigation or Litigation. 指由公司法律合规部门签发的、指示保留某项调查或诉讼相关记录的书面（可能为电子邮件或其他电子形式）指令。
Litigation 诉讼	means (i) any legal proceeding to which Company or any Company Personnel in their capacity as Company Personnel is a party or a witness that is brought in any court, alternative dispute resolution forum or administrative agency; or (ii) any other legal proceeding where Company or Company Personnel hold Records that are relevant to such legal proceeding. Litigation includes not only existing Litigation but also includes situations where Company or Company Personnel have notice, should know or reasonably can anticipate future Litigation. 指（i）公司或任何公司人员以其公司人员身份作为一方当事人或证人、在任何法院、替代性纠纷解决机构或行政机关提起的法律程序；或（ii）公司或公司人员持有相关记录的任何其他法律程序。诉讼不仅包括已存在的诉讼，还包括公司或公司人员已获通知、应当知道或能够合理预见将会发生诉讼的情形。
Mainland China or PRC 中国大陆或中华人民共和国	means the territory of the People's Republic of China, for the sole purpose of this Policy, excluding the Hong Kong Special Administrative Region, the Macau Special Administrative Region, and Taiwan province. 就本政策而言，指中华人民共和国领土范围，不包括香港特别行政区、澳门特别行政区及台湾省。
Personal Data 个人数据	means any information relating to an identified or identifiable natural person (Data Subject). 指已识别或可识别的自然人（数据主体）的任何相关信息。
Processing / Processing Activity 处理/处理活动	means any operation performed on Personal Data, including collection, recording, storage, use, alteration, transmission, provision, disclosure, deletion, etc. 指对个人数据进行的任何操作，包括收集、记录、存储、使用、修改、传输、提供、披露、删除等。
Records 记录	means data, documentation and information, regardless of physical form or characteristic, generated or received by or on behalf of Company or Company Personnel in their capacity as Company Personnel. 指由公司、公司人员或其代表以公司人员身份生成或接收的以任何物理形式或特征存在的数据、文件及信息。
Site 研究中心	means any medical institution that meets the corresponding conditions and conducting clinical trials or other scientific research for drugs in accordance with relevant Good Clinical Practices and other Applicable Law or guidelines. 指符合相应条件、根据相关《药物临床试验质量管理规范》及其他适用法律或指南开展药物临床试验或其他科学研究的

	医疗机构。
Project Lead 项目负责人	means the team leader initiating the activities involving the collection, preservation, utilization, or external provision of HGRs, which should be the primary responsible person for HGR compliance as per the current HGR management framework. 指启动相应活动以采集、保藏、利用或对外提供人类遗传资源的团队负责人，根据现行人类遗传资源管理框架，该项目负责人应为人类遗传资源合规事宜的首要责任人。
Sensitive Personal Data 敏感个人数据	means any information that, if leaked or unlawfully used, is likely to (i) infringe the dignity of a Data Subject or (ii) cause material harm to that Data Subject's safety, rights or property. 指一旦泄露或者非法使用，可能（i）侵犯数据主体尊严或（ii）对数据主体的人身安全、权利或财产造成重大损害的任何信息。

All other terms used in this Policy shall have the meaning ascribed to them by Applicable Law as well as their potential modifications and interpretations.

本政策中使用的所有其他术语，均应具有适用法律及其后续修订与解释所赋予的含义。

4. Protecting Personal Data

保护个人数据

4.1. Basic Principles

基本原则

The Company's global privacy framework is built on six core principles. You are expected to follow these principles whenever you handle Personal Data to ensure it is processed legally, ethically, and responsibly. The six principles are:

公司的全球隐私框架以六项核心原则为基石构建。在处理个人数据时，您均应遵循该六项原则，以确保数据处理符合法律规定、道德规范及公司责任要求。该六项原则如下：

- Fairness;
公平；
- Transparency;
透明；
- Minimization;
最小必要；
- Security;
安全；
- Retention; and
保存限制；以及
- Integrity.
完整。

4.1.1. Fairness

公平

Process Personal Data in ways people would reasonably expect, and avoid actions that could cause undue or harmful impact. Use data only for specified and legitimate business purposes. Don't rely on dishonest, coercive, or improper means. If a proposed use could materially affect Data Subjects, escalate the matter to the Legal and Compliance Department so that risks and benefits can be

assessed and documented in line with the Applicable Law.

以公众合理预期的方式处理个人数据，并避免可能造成不当或有害影响的行为。仅将数据用于明确规定的合法业务目的。不得采取不诚实、胁迫或不正当的手段处理数据。如果拟定的数据使用方式可能对数据主体产生重大影响，应将该事项上报法律合规部门，以便依据适用法律对风险与收益进行评估并记录在案。

4.1.2. Transparency

透明

Be clear about what Personal Data is collected, why it is needed, how it will be used, how long it will be kept, whether it will be shared or transferred (including cross-border), and how Data Subjects can exercise their rights. Unless it is not required by Applicable Law, you should provide a privacy notice before collecting Personal Data—or as soon as practicable if prior notice is not possible. If providing notice could interfere with legal or ethical obligations (e.g., an Investigation), or if it is unclear whether notice is required by Applicable Law, consult the Legal and Compliance Department immediately and document the rationale.

必须明确告知所收集的个人数据内容、收集目的、使用方式、保存期限、是否会被共享或传输（包括跨境）以及数据主体行使权利的方式。除非适用法律不要求，在收集个人数据前应提供隐私声明；如果无法事先告知，应在可行时尽快告知。如果提供声明可能妨碍法律或道德义务的履行（例如，正在进行调查），或在无法确定适用法律是否要求隐私声明的情况下，应立即咨询法律合规部门并记录相关理由。

4.1.3. Minimization

最小必要

Collect and use only the Personal Data that is adequate, relevant, and necessary for the purpose at hand. Don't collect or use Personal Data without a specific business purpose. Don't share data with anyone who does not have a legitimate need to know. Where feasible, use de-identified, pseudonymized, or anonymized data. You are expected to review your access rights and data sets regularly and remove what is unnecessary.

仅收集和使用与处理目的直接相关、充分且必要的个人数据。不得在无具体业务目的的情况下收集或使用个人数据。不得与没有合法知悉需求的人员共享数据。尽可能使用去识别化、假名化或匿名化的数据。您必须定期审查自身的数据访问权限及数据集，并及时移除不必要的数据。

4.1.4. Security

安全

You are responsible for ensuring that Personal Data you handle is safe, protected, and stored properly, in line with Company's security policies and Applicable Law. Use appropriate safeguards (e.g., access controls, encryption, monitoring, secure systems, security training). Only access or change Personal Data if you are authorized and have a legitimate business need. Immediately report any suspected loss, unauthorized access, or security incident to the IT Department and Legal and Compliance Department.

您应根据公司安全政策及适用法律，确保所处理的个人数据安全、受保护并且存储妥善。采取适当的保障措施（例如，访问控制、加密、监控、安全防护系统、安全培训）。仅在获得授权且存在合法商业需要时，才可以访问或修改个人数据。如果出现任何疑似数据丢失、未经授权访问或安全事件，应立即向IT部门及法律合规部门报告。

4.1.5. Retention

保存限制

Personal Data should be kept only for as long as necessary for the stated purpose or as required by law. Follow the Company's records retention schedules, and securely delete or anonymize data when it is no longer needed. If a Legal Hold is in place, all relevant Records must be preserved and ordinary deletion paused until the Legal and Compliance Department confirms the Legal Hold

is lifted.

个人数据的保存期限应仅为实现所述目的必需的时间，或法律要求的期限。应遵循公司的记录保存时间表，当不再需要某些数据时，应安全地予以删除或匿名化。若已下达法定数据留存指令，则必须保存所有相关记录，并暂停常规删除程序，直至法律合规部门确认该法定数据留存指令已解除。

4.1.6. Integrity **完整**

Take reasonable steps to ensure that the Personal Data you handle is accurate, complete, and up to date. If you are aware of inaccurate data, correct or delete inaccurate data without undue delay following applicable Company systems and processes. Use Company systems and processes that support timely correction, deletion, or anonymization, and review data quality on a regular basis. 应采取合理措施，确保所处理的个人数据准确、完整并保持更新。如果你知道有不准确的数据，应遵循适用的公司系统和流程立即更正或删除不准确的数据，不得无故拖延。使用支持及时更正、删除或匿名化的公司系统与流程，并定期审查数据质量。

4.2. Data Privacy in Practice **数据隐私实践**

4.2.1. Collecting Personal Data **个人数据的收集**

- Collect Personal Data only for specific, explicit, and legitimate business purposes that have been documented in advance. Don't collect information if there is no clear and approved purpose.
仅可基于事先明示的具体、合法的业务目的收集个人数据。如果没有明确且经过批准的目的时，不得收集个人数据。
- Before collecting or using any Personal Data, make sure there is a valid legal basis (e.g., consent where required, performance of a contract, compliance with a legal obligation, or another lawful ground.) If you are unsure about the basis, check with the Legal and Compliance Department before proceeding.
在收集或使用任何个人数据前，确保存在有效的合法性基础（例如，已征得必要同意、为了履行合同、遵守法定义务或其他合法性基础）。如果对合法性基础存疑，请在收集前咨询法律合规部门。
- Unless it is not required by Applicable Law, provide Data Subjects with a clear, concise, and accessible privacy notice before collecting their Personal Data, or as soon as practicable if prior notice is not feasible. If providing such notice could interfere with legal or ethical obligations, for example in the context of an investigation, consult the Legal and Compliance Department immediately and record the justification.
除非适用法律不要求，在收集数据主体的个人数据前，应向其提供清晰、简明且易于获取的隐私声明；如果无法事先告知，应在可行时尽快告知。如果提供该等声明可能妨碍法律或道德义务的履行（例如，在调查程序中），应立即咨询法律合规部门并记录相关理由。
- If collection relies on consent, ensure that the consent is freely given, informed, and unambiguous. You should also provide a simple way for Data Subjects to withdraw their consent, in line with Applicable Law.
如果需要征得同意才能进行收集，请确保该同意是自愿给予、充分知情且明确无误的。同时，还应根据适用法律为数据主体提供简便的撤回同意途径。
- When handling Sensitive Personal Data or minors' data, be especially cautious. Collect and use such data only when it is strictly necessary, and always apply the safeguards required by Applicable Law. If in doubt, involve the Legal and Compliance Department to confirm

compliance before proceeding.

处理敏感个人数据或未成年人数据时，需要格外审慎。收集和使用该等数据必须遵守严格必要原则，并始终采取适用法律要求的保障措施。如果有疑问，请务必在继续操作之前，请先联系法律合规部门确认合规性。

4.2.2. Processing Personal Data

个人数据的处理

- **Process Personal Data only if you have a legitimate business need and for the purposes that have been disclosed. Access should always be limited to those with a need to know, and confidentiality obligations apply to everyone handling such data.**
只有在您有合法的业务需求且出于已披露的目的时，才可以处理个人数据。应仅限确有知悉需要的人员访问数据，且所有处理该等数据的人员均须承担保密义务。
- **Whenever possible, use de-identified, pseudonymized, or anonymized data. Review access rights and permissions regularly and remove anything unnecessary.**
尽可能使用去识别化、假名化或匿名化的数据。定期审查访问权限，并移除任何不必要的内容。
- **Do not use Personal Data for a new purpose unless this is permitted under Applicable Law after a compatibility assessment. If notice or consent is required, make sure it is updated before using the data in a new way.**
除非经过兼容性评估且适用法律允许，否则不得将个人数据用于新的目的。如果需要告知或征得同意，请确保在以新目的使用数据之前完成更新。
- **Take reasonable steps to keep Personal Data accurate, complete, and up to date. Correct or delete inaccuracies without undue delay.**
应采取合理措施确保个人数据准确、完整并保持更新。立即更正或删除不准确的数据，不得无故拖延。
- **Apply Privacy by design and default when you create or make material changes to products, services, or processes that handle Personal Data. Consult the Legal and Compliance Department where appropriate.**
在创建处理个人数据的产品、服务、流程或对其进行重大变更时，应遵循隐私设计与隐私默认保护原则。当适当时，应咨询法律合规部门。
- **Always apply technical and organizational measures that match the sensitivity and risks of the data. This includes access controls, encryption, monitoring, secure development and change management, and security training, in line with Company's security policies and Applicable Law.**
始终采取与数据敏感性及风险相匹配的技术和组织措施。包括但不限于：根据公司安全政策及适用法律，实施访问控制、加密、监控、安全开发与变更管理以及安全培训。
- **Report any suspected loss, unauthorized access, disclosure, or other incident involving Personal Data immediately through the Company's incident reporting channels and notify the Legal and Compliance Department.**
如果出现任何涉及个人数据的疑似丢失、未经授权访问、披露或其他事件，应立即通过公司事件报告渠道上报，并通知法律合规部门。
- **Never use Personal Data for personal gain or for purposes unrelated to your work for the Company.**
严禁为获取个人利益或为了与公司工作无关的目的使用个人数据。

4.2.3. Sharing Personal Data

个人数据的共享

- Internal sharing of Personal Data should be limited to recipients who have a legitimate business need, and it must take place only through Company-approved secure channels.
个人数据的内部共享应仅限于确有合法商业需要的接收方，并且必须通过公司批准的安全渠道进行共享。
- When sharing with vendors or other third parties, do so only under a binding written contract that includes appropriate data protection terms. These should cover processor instructions, confidentiality, security, and obligations to delete or return data. Complete all required security due diligence before sharing, and provide only the minimum amount of Personal Data necessary.
与供应商或其他第三方共享数据时，仅可按照包含适当数据保护条款且具有约束力的书面合同进行。该等条款应涵盖处理者指令、保密条款、安全要求以及数据删除或返还义务。在共享前应完成所有要求的安全尽职调查，并仅在实现目的所必需的最小范围内提供个人数据。
- In line with Applicable Law, Data Subjects should be informed that their data will be shared and the purposes for doing so. If a lawful ground is required, such as separate consent, it must be obtained before the sharing takes place.
依据适用法律，应告知数据主体其数据将被共享以及共享的目的。如果共享数据需要有合法性基础（例如，单独的同意），则必须在共享前获得该合法性基础。
- Cross-border transfers must always comply with Applicable Law, including any required transfer mechanisms, assessments, or approvals, and should use safeguards that ensure an adequate level of protection.
跨境传输必须始终遵守适用法律，包括任何要求的传输机制、评估或批准，并应采取保障措施，确保提供充分保护。
- The Company will maintain records of disclosures as required by law and will monitor vendor compliance. Vendors, in turn, are responsible for ensuring that their staff follow this Policy when Processing Personal Data for or on behalf of the Company.
公司将依法保存披露记录，并监督供应商的合规情况。相应地，供应商应负责确保其员工在为公司或代表公司处理个人数据时遵守本政策。

4.2.4. Securing Personal Data

个人数据的保护

- Personal Data should be kept only for as long as necessary to meet the stated purposes or as required by law, in line with the Company's records retention schedules.
个人数据的保存期限应仅为实现所述目的必需的时间，或法律要求的期限，并且应遵循公司的记录保存时间表。
- Do not save Personal Data to your local drive or device. Always use the secure access methods provided by the Company when Processing Personal Data.
不得将个人数据保存至本地驱动器或设备。处理个人数据时，应始终使用公司提供的安全访问方法。
- Avoid creating duplicate copies of Personal Data outside the designated database where the data is stored. If you need to collect such data temporarily to perform your role, secure it according to Company standards, apply the same lifecycle and management requirements, and destroy it securely once the temporary need is met.
避免在存储该数据的指定数据库之外创建个人数据的副本。如果因履行职责需要临时收集该等数据，应根据公司标准确保数据安全，适用相同的生命周期管理要求，并在满足临时性需求后安全销毁。

- Avoid making physical copies of Personal Data. If short-term use requires them, ensure they are securely destroyed once the need has passed.
避免制作个人数据的实体副本。如果因短期使用需要该等副本，应确保在使用完毕后安全销毁。
- When Personal Data is no longer needed, delete or anonymize it securely and completely. Where archiving is necessary, use secure repositories with restricted access that preserve the integrity and readability of the data.
当不再需要个人数据时，应安全、彻底地删除或匿名化处理。如果需要归档，应使用具有访问限制的安全存储库，以确保数据的完整性与可读性。

4.3. Individual's Data Rights

个人的数据权利

The Company maintains processes that allow Data Subjects to exercise the rights granted to them under Applicable Law. These rights must be respected in all circumstances, subject to legal requirements and any available exemptions. As part of your role, you may be asked to help ensure these requests are handled promptly and appropriately. If you receive a request from a Data Subject, please contact and consult the Legal and Compliance Department to ensure compliance.

公司建立相应流程，以便数据主体行使适用法律赋予他们的权利。在任何情况下均须尊重这些权利，但法律另有规定及适用豁免的情形除外。作为您职责的一部分，您可能被要求协助确保这些请求得到及时且妥善的处理。如果您收到数据主体的请求，请联系并咨询法律合规部门以确保合规。

- **Access and copy:** If a Data Subject asks whether the Company is Processing their Personal Data, or requests a copy, you should follow Company procedures to provide the information unless an exemption applies. Handle such requests promptly, generally within 15 days if required by law.
查阅和复制：如果数据主体询问公司是否正在处理其个人数据，或要求获取副本，除适用豁免的情形外，您应遵循公司程序提供该等信息。应及时处理该等请求，如果法律有要求，一般应在15日内处理。
- **Explanation:** If a Data Subject asks for an explanation of how their data is processed, be prepared to direct the request through the proper Company channels so that a clear response can be provided.
解释：如果数据主体请求对数据的处理方式进行解释，应通过合适的公司渠道转交该请求，以便提供明确答复。
- **Rectification and Completion:** If a Data Subject identifies inaccurate or incomplete Personal Data, you should help ensure that corrections are verified and implemented without undue delay.
更正与补充：如果数据主体发现其个人数据不准确或不完整，您应立刻协助确保修正措施已核实并得到实施。
- **Deletion:** If a Data Subject requests deletion of their Personal Data, confirm whether the conditions for deletion are met, such as the purpose being achieved, services no longer being provided, consent being withdrawn, or the data being unlawfully processed. Where deletion is not possible due to technical limits or retention obligations, stop further Processing other than storage and apply appropriate security measures.
删除：如果数据主体要求删除其个人数据，应核实其是否满足删除条件，如处理目的已实现、不再提供服务、同意被撤回或数据被非法处理等。如果因技术限制或保存义务而无法删除，须停止一切除存储外的进一步处理活动，并采取相应的安全措施。
- **Restriction or Limitation:** Be aware that Data Subjects may request restrictions on Processing. If such a request arises, follow Company processes and consult the Legal and Compliance Department to ensure compliance.

限制或约束： 请注意，数据主体可能会要求限制对其个人数据的处理。如果数据主体提出该等请求，应遵循公司既定流程并咨询法律合规部门，以确保合规。

- **Objection:** Data Subjects may object to certain types of Processing. Do not continue Processing in such cases unless there is a lawful basis to do so, confirmed with the Legal and Compliance Department.

拒绝： 数据主体可能会拒绝某些类型的处理活动。在此情况下，除非与法律合规部门确认存在继续处理的合法性基础，否则不得继续处理。

- **Portability and Transfer:** If a Data Subject asks to transfer their Personal Data to another Controller, escalate the request through the Company's designated process so that it can be facilitated appropriately.

可携性和传输： 如果数据主体要求将其个人数据传输给其他控制者，应通过公司指定流程上报该请求，以便妥善协助完成该请求。

- **Withdrawal of Consent:** Where Processing relies on consent, Data Subjects may withdraw consent at any time. Once you become aware of such withdrawal, ensure that Processing stops unless another lawful ground applies.

撤回同意： 如果处理数据需要征得同意，数据主体可以随时撤回其同意。一旦知悉同意被撤回，您必须确保停止处理活动，除非存在其他适用的合法性基础。

5. Human Genetic Resources and Related Data

人类遗传资源及相关数据

According to the China HGR Regulation, China imposes strict controls on activities involving utilization of HGRs. For any Company-sponsored or Company-conducted activity that enrolls participants from Mainland China, the Company shall comply with Applicable Law governing HGR. This includes all activities related to the collection, preservation, utilization, and external provision of HGR Materials and/or HGR Data derived from such participants.

根据中国关于人类遗传资源的相关法规，中国对涉及人类遗传资源利用的活动实施了严格管制。对于任何由公司申办或开展并招募中国大陆参与者的活动，公司均应遵守关于人类遗传资源的适用法律。包括与采集、保藏、利用或对外提供源自该等参与者的人类遗传资源材料和/或人类遗传资源信息相关的活动。

Please refer to **China Human Genetic Resources Management Addendum** appended to this Policy for additional information and detailed guidance on the Company's HGR management and your obligations (as applicable).

有关公司人类遗传资源管理及您的相关义务（如适用）的更多信息与详细指引，请参阅本政策随附的《中国人类遗传资源管理附录》。

6. International Transfers

跨境传输

The Company operates globally, which means that Personal Data may be transferred across national borders to countries where affiliates, processors, or third-party partners are located. Particularly, Company Personnel's Personal Data may be processed on servers located outside of the country where such Company Personnel live. All such transfers shall comply with Applicable Law.

公司在全球范围内运营，这意味着公司可能会将个人数据跨境传输至关联公司、处理者或第三方合作伙伴所在的国家/地区。特别是，公司人员的个人数据可能会在位于该人员居住国家/地区之外的服务器上进行处理。所有该等传输均应遵守适用法律。

Before any cross-border transfer takes place, you should make sure the transfer is lawful, necessary for the relevant business purpose, and carried out through approved Company processes. Appropriate technical, organizational, and contractual measures must be in place to ensure that the recipient provides a level of protection for Personal Data that is adequate and consistent with legal requirements.

在进行任何跨境传输前，您应确保该传输合法、为相关业务目的所必需，并且应通过经批准的公司流程进行。必须落实适当的技术、组织及合同措施，以确保接收方为个人数据提供充分且符合法律要求的保护。

Additionally, if you need to transfer HGR Data outside of China, you should review (i) **Section 5** of this Policy and (ii) the **China HGR Management Addendum** attached at the end of this Policy for additional information and guidance on the Company's HGR management.

此外，如您需要将人类遗传资源信息传输至中国境外，请仔细阅读（i）本政策**第5条**以及（ii）本政策末尾随附的《中国人类遗传资源管理附录》，以获取关于公司人类遗传资源管理的更多信息和指导。

7. Data, Information and Document Retention

数据、信息和文件留存

The Company is committed to managing and retaining data, documentation, and other information, whether in paper, electronic, or other formats (collectively, “**Records**”), in accordance with Applicable Law and sound business practices. The frameworks in this Section prioritize the retention of data, information or document critical to scientific, financial, and regulatory purposes while protecting Personal Data through timely, secure, and efficient disposal processes.

公司承诺依据适用法律及良好的商业惯例，对纸质、电子或其他格式的数据、文件及其他信息（统称“**记录**”）进行管理和留存。本条中的框架优先保留对科学、财务及监管目的至关重要的数据、信息或文件，同时通过及时、安全、高效的处置流程保护个人数据。

Based on the classification and intended use of Records, the Company implements proportionate controls, processes, and technologies to prevent unauthorized access. These measures protect the Company and its stakeholders and safeguard the privacy of Data Subjects, including patients, employees, healthcare professionals, and business partners, thereby maintaining stakeholder trust and regulatory compliance.

公司按照记录的类别及预期用途，实施了相应的控制措施、流程及技术，以防止未经授权的访问。这些措施旨在保护公司及其利益相关方，并保障数据主体（包括患者、员工、医疗卫生专业人士及业务伙伴）的隐私，从而维系利益相关方的信任并确保合规。

7.1 Governance and Responsibilities

治理与职责

In accordance with our commitment to maintaining compliant document management practices, the Company endeavors to meet the following requirements by adopting governance accountabilities and responsibilities and implementing risk management processes:

为践行合规文件管理实践的承诺，公司致力于通过明确治理职责以及实施风险管理流程，满足下列要求：

- Establish and operate appropriate resources to deliver on responsibilities and ensure compliance.
建立并运作适当的资源体系以履行职责并确保合规。
- Identify, approve, and record Confidential Records.
识别、批准并登记保密记录。
- Identify and record the physical location of Confidential Records.
识别并登记保密记录的物理存放位置。
- Assign Records owners with agreed accountabilities to Confidential Records. Records owners are responsible for ensuring the accuracy, integrity, and security of the Records under their purview.

为保密记录指定记录责任人，并约定其职责。记录责任人应负责确保其管辖范围内记录的准确性、完整性及安全性。

- Develop and implement a risk-based plan to mitigate identified risks and improve governance maturity.
制定并实施基于风险的计划，以缓解已识别的风险并提升治理成熟度。
- Manage Confidential Records in accordance with applicable retention requirements while recognizing any Legal Hold.
依据适用的留存要求管理保密记录，同时遵循任何法定数据留存指令。

To effectively govern our Records, the individual responsible for the relevant Department (“**Department Head**”) should ensure good document retention practices within the span of control of the department, and meet the requirements above. The Department Head is tasked with the critical responsibility of nominating qualified individuals to retain and maintain the Records, or otherwise supervising the retention and maintenance of the Records in compliance with the requirements above, thereby facilitating effective document governance across the organization. Additionally, the Department Head must actively engage in overseeing these document retention practices and is accountable for maintaining overall compliance within their respective department. Unless otherwise arranged (subject to the approval by the Chief Compliance Officer), the Company’s IT department should be responsible for establishing and maintaining a platform for saving electronic Records. The electronic Records of each department should be kept in such electronic document storage platform designated by the Company’s IT department.

为有效管理公司记录，各相关部门负责人（“**部门主管**”）应确保在其管辖范围内遵循良好的文件留存惯例，并满足上述要求。部门主管承担着提名合格人员来保存和维护记录的关键职责，以此推动全组织的有效文件管理，或以其他方式监督记录的保留和维护，以符合上述要求。此外，部门主管必须积极参与监督此等文件留存实践，并负责维护其各自职能范围内的整体合规性。除非另有安排（须经首席合规官批准），公司IT部门应负责建立并维护用于保存电子记录的平台。各部门的电子记录应保存在由公司IT部门指定的电子文档存储平台中。

7.2 Retention, Archive, and Disposal

留存、存档和处置

The Department Head shall be responsible for supervising and coordinating the retention, archive, management, and destruction of Records within the span of control of the department, specifically:
部门主管应负责监督并协调其管辖范围内记录的留存、归档、管理及销毁事宜，具体包括：

- All Records are managed to ensure accuracy, integrity, security, readability, and accessibility over the defined lifetime of the Records.
对所有记录进行管理，以确保记录在其既定保存期限内的准确性、完整性、安全性、可读性及可访问性。
- Records shall be stored in a safe and accessible manner. Confidential Records shall be protected with strengthened security measures.
以安全且便于获取的方式存储记录。采取经过强化的安全措施保护保密记录。
- Records must be archived, as necessary, in secure archives with restricted access. Archiving should be performed in a manner that maintains the integrity and readability of the Records and ensures that they can be easily retrieved if needed.
必要时须在限制访问的安全归档库中归档记录。归档操作应能维持记录的完整性及可读性，并确保在需要时可轻松检索。
- Transfer of Records between media or formats must be controlled and validated.
记录在不同介质或格式间的传输必须受控并经过验证。

- When Records are scheduled for disposal, the method of disposal should be appropriate to the nature and sensitivity of the Records concerned and in compliance with Applicable Law. 当计划处置记录时，处置方法应契合相关记录的性质与敏感度，并符合适用法律。
- Legal Holds issued by the Company's Legal and Compliance Department override ordinary retention and deletion; Records subject to a Legal Hold shall be preserved until the Company's Legal and Compliance Department formally lifts the hold. 公司法律合规部门下达的法定数据留存指令优先于常规的保存与删除规定；受法定数据留存指令约束的记录必须保存至法律合规部门正式解除该指令为止。

7.3 Legal Hold

法定数据留存指令

From time to time, the Company's Legal and Compliance Department may issue a "Legal Hold," suspending the disposal of any documents due to pending, threatened, or otherwise reasonably foreseeable Litigation, Investigation, or similar proceedings. If and when Company Personnel are informed of this, they shall not discard, revise or conceal any documents relevant to the subject matter of the Litigation, Investigation, or proceedings. Company Personnel will be informed of the specific types of documents that are relevant and must be retained for these purposes by the Legal and Compliance Department. Company Personnel shall not discard, revise or conceal any document that may be relevant without the written approval of the Legal and Compliance Department. In case of any doubt, Company Personnel should save the document.

因未决、似将发生或可合理预见的诉讼、调查或类似法律程序，公司法律合规部门可能不时下达“法定数据留存指令”，从而暂停任何相关文件的处置。公司人员一旦获悉该指令，不得丢弃、修改或隐藏与上述诉讼、调查或法律程序标的相关的任何文件。法律合规部门将告知公司人员需为此等目的留存的相关文件的具体类型。未经法律合规部门书面批准，公司人员不得丢弃、修改或隐藏任何可能相关的文件。如有任何疑问，公司人员应保存该文件。

Specifically,
具体而言，

- **Company Personnel must immediately notify the Legal and Compliance Department** if they: (a) become aware that any Litigation or Investigation has been initiated; (b) receive notice of actual or potential Litigation or an Investigation; or (c) know, should know, or can reasonably anticipate that Litigation or an Investigation may be initiated. 如果存在以下情形，公司人员必须立即通知法律合规部门：（a）公司人员知悉任何诉讼或调查已启动；（b）公司人员收到实际发生或可能发生诉讼、调查的通知；或（c）公司人员知道、应当知道或能够合理预见可能启动诉讼或调查。
- The Company's Legal and Compliance Department will determine whether to initiate a Legal Hold with respect to Records relating to Litigation or an Investigation. Records subject to a Legal Hold must be retained while the Legal Hold is in effect, irrespective of the otherwise applicable retention period. 公司法律合规部门将决定是否就与诉讼或调查相关的记录下达法定数据留存指令。受法定数据留存指令约束的记录，在法定数据留存指令生效期间必须予以留存，无论其原本适用的保存期限如何。
- Where a Legal Hold is initiated, the Legal and Compliance Department will notify the Company Personnel it believes need to be aware of the Legal Hold and will specify the Records subject to retention while the Legal Hold is in effect and may issue special instructions relating to such Records. Such Company Personnel are required to follow special instructions. In addition, such Company Personnel should immediately advise the Legal and Compliance Department of others who may need to know about the Legal Hold. 如果下达法定数据留存指令，法律合规部门将通知其认为需要知悉该指令的公司人员，明确指令生效期间需要留存的记录，并且可能就该等记录发出特别指示。相关

公司人员必须遵循该等特别指示。此外，相关公司人员应立即将其他可能需要知悉该法定数据留存指令的人员告知法律合规部门。

- A Legal Hold remains in effect until the Legal and Compliance Department formally terminates the Legal Hold by written notice.
法定数据留存指令的效力持续至法律合规部门通过书面通知正式终止该指令为止。

8. Questions Concerning this Policy

关于本政策的问题

Any questions, comments, or concerns regarding this Policy should be directed to the Legal and Compliance Department.

任何有关本政策的疑问、意见或疑虑，均应发送至法律合规部门。

Exhibit A Data Privacy and Protection Policy Acknowledgment
附件 A 数据隐私与保护政策确认书

I, _____, hereby acknowledge that I have received, read, understood and agree to adhere strictly to the Structure Therapeutics, Inc.'s Data Privacy and Protection Policy (including the China Human Genetic Resources Management Addendum and Jurisdictional Addendum, the "Policy").
本人_____, 特此确认已收到、阅读、理解并同意严格遵守Structure Therapeutics, Inc.的《数据隐私与保护政策》(包括《中国人类遗传资源管理附录》《司法辖区附录》, 下称“政策”)。

By signing this acknowledgement, I further confirm that I understand and agree to the following:
通过签署本确认书, 本人进一步确认理解并同意以下内容:

- ☐ I confirm that the Company can Process my Personal Data, including transfers to Structure Therapeutics, Inc. or any of its subsidiaries that are located outside my country of residence, for the purpose of fulfilling my contractual relationship with the Company and/or for human resources management.

本人确认, 公司为履行与本人的合同关系和/或进行人力资源管理之目的, 可以处理本人的个人数据, 包括将其传输至Structure Therapeutics, Inc.或其位于本人居住国以外的任何子公司。

- ☐ I confirm that I have read and understood the sections of this Policy concerning Human Genetic Resources materials and data management (including China Human Genetic Resources Management Addendum and Jurisdictional Addendum) and I will remain in strict compliance with these provisions (including seeking and obtaining appropriate internal approvals before transferring any HGR Materials or HGR Data (i) outside of Mainland China and/or (ii) to any third parties that may potentially transfer them outside of Mainland China (as applicable)).

本人确认, 本人已阅读并理解本政策中关于人类遗传资源材料与数据管理的条款(包括《中国人类遗传资源管理附录》《司法辖区附录》), 并将严格遵守该等规定, 包括在将任何人类遗传资源材料或人类遗传资源信息(i)传输至中国大陆境外, 和/或(ii)提供给任何可能将其传输至中国大陆境外的第三方(如适用)之前, 寻求并获得相应的内部批准。

Signature: _____
签名: _____

Date: _____
日期: _____

Exhibit B China Human Genetic Resources Management Addendum

附件 B 中国人类遗传资源管理附录

1. Purpose

宗旨

To ensure the Company's strict compliance with the China HGR Regulations, and to support the effective conduct of related clinical trials, scientific research, and/or other projects, this China Human Genetic Resources Management Addendum (the "**Addendum**") sets out the requirements and procedures in relation to handling HGRs in Mainland China. It guides the Company's Processing of HGR Materials and/or HGR Data for their intended purposes.

为确保公司严格遵守中国关于人类遗传资源的相关法规，并支持相关临床试验、科学研究和/或其他项目的有效开展，本《中国人类遗传资源管理附录》（下称“**附录**”）规定了在中国大陆境内处理人类遗传资源的相关要求与程序。本附录旨在指导公司为实现预期目的而对人类遗传资源材料和/或人类遗传资源信息进行处理。

2. Applicability

适用范围

This Addendum applies to any activities sponsored or conducted by the Company, regardless of whether sponsored or conducted through a Chinese subsidiary or not, which are related to the collection, preservation, utilization, and external provision of HGR Materials and/or HGR Data derived from participants in Mainland China.

本附录适用于公司申办或开展的、与采集、保藏、利用或对外提供源自中国大陆参与者的人类遗传资源材料和/或人类遗传资源信息相关的任何活动，无论该等活动是否通过中国子公司申办或开展。

3. General Requirements

一般要求

3.1 The Company is a "Foreign Entity"

公司属于“外方单位”

It should be aware that the Company, as a Nasdaq - listed company with broad foreign investor base, **will be regarded as a "Foreign Entity" under the China HGR Regulation.** Foreign Entities as well as overseas individuals shall not collect or preserve China's HGRs within Mainland China, nor shall they provide China's HGRs to overseas entities or individuals.

须知，作为一家在纳斯达克上市并拥有广泛外资背景的公司，**根据中国关于人类遗传资源的相关法规，本公司将被视为“外方单位”**。外方单位及境外个人不得在中国大陆境内采集、保藏中国人类遗传资源，亦不得向境外实体或个人提供中国人类遗传资源。

Due to the above legal restriction, any activities concerning HGRs shall be conducted in collaboration with at least one Chinese Entity, with proper approval or filing being obtained (please refer to Section 3.3 of this Addendum). It is highly sensitive to process HGRs solely by the Company without the involvement of Chinese Entities, especially those Processing activities related to sending HGR Materials or HGR Data outside Mainland China.

鉴于上述法律限制，任何涉及人类遗传资源的活动均须与至少一家中方单位合作开展，并且必须事先获得相应的许可或完成备案（请参阅本附录第 3.3 条）。如果仅由公司单独处理人类遗传资源而没有中方单位参与，将具有高度敏感性，尤其是涉及将人类遗传资源材料或信息发送到中国大陆境外的处理活动。

3.2 Basic Principles 基本原则

The Company's HGR compliance management framework is built upon some basic principles to ensure HGR-related activities are carried out legally, ethically, and responsibly. The Processing of HGRs by the Company shall:

公司的人类遗传资源合规管理框架以若干基本原则为基石建立，旨在确保人类遗传资源相关活动的开展符合法律规定、道德规范及公司责任要求。公司处理人类遗传资源时应做到：

- not endanger the public health, state security and public interests;
不危害公众健康、国家安全和社会公共利益；
- comply with China HGR Regulation, the ethical principles and the privacy rights of HGR providers;
遵守中国关于人类遗传资源的相关法规、伦理原则并尊重人类遗传资源提供者的隐私权；
- not purchase or sell Mainland China's HGRs, unless the payment or charge is the reasonable cost for the provision or use of HGRs for scientific research; and
不得买卖中国大陆的人类遗传资源，但为科学研究目的提供或使用人类遗传资源并支付或收取合理成本费用的除外；以及
- have specific and legitimate purposes and a reasonable plan, and pass the ethical review.
具有明确、合法的目的与合理的方案，并通过伦理审查。

3.3 Regulatory Framework of HGR Administration 人类遗传资源管理监管框架

Under the China HGR Regulation, any Processing of HGRs conducted by a Foreign Entity is subject to certain approvals/filings by competent authorities. Please find below a summary of the regulatory framework of HGR administration under the China HGR Regulation. If this is in conflict with the most up-to-date Applicable Law, the Applicable Law should prevail.

根据中国关于人类遗传资源的相关法规，由外方单位实施的任何人类遗传资源处理活动，均须获得主管机关的许可或完成备案。以下为中国关于人类遗传资源的相关法规规定的人类遗传资源管理监管框架的概要。如果此概要与最新的适用法律相冲突，应以适用法律为准。

- **Competent authority:** National Health Commission (国家卫生健康委员会, "NHC") is the competent authority administrating matters related to HGRs. All materials of application for relevant approval or filing should be submitted to China National Center for Biotechnology Development (中国生物技术发展中心) under the NHC, which is the successor to Human Genetic Resource Administration of China (中国人类遗传资源管理办公室, "HGRAC").

主管机关：国家卫生健康委员会（下称“**国家卫健委**”）为负责管理人类遗传资源相关事务的主管机关。申请相关许可或备案需要的所有材料均应提交至国家卫健委下属的中国生物技术发展中心，其前身是中国人类遗传资源管理办公室（下称“**遗传办**”）。

Note:**注:**

- Although HGRAC ceased operations in 2023 and was succeeded by China National Center for Biotechnology Development, given that the name of “HGRAC” is more widely recognized, we will continue to use HGRAC to refer to China National Center for Biotechnology Development and its subsequent successor in this Addendum.

尽管遗传办已于 2023 年停止运营，并且由中国生物技术发展中心承继，但鉴于“遗传办”这一名称更为业界所熟知，本附录中将继续使用“遗传办”指代中国生物技术发展中心及其后续承继机构。

- Project team may refer to this website (only a Chinese version is available) https://www.nhc.gov.cn/qjjys/rlyczygl/new_list.shtml or the updated website for currently latest official guidelines.

项目团队可以访问网址 https://www.nhc.gov.cn/qjjys/rlyczygl/new_list.shtml（仅提供中文版本）或其更新网址，以获取当前最新的官方指南。

- **Process required:** The approvals or filings required for conducting activities involving HGRs are as follows:

所需流程: 开展涉及人类遗传资源的活动所需许可或备案的流程如下:

Activity 活动	Example 示例	Involvement by the Company 公司参与形式	Process Required 所需流程	Further Action 后续行动
Collection, preservation, or export of HGRs 采集、保藏、利用或对外提供人类遗传资源	- Collection of HGRs of more than 3,000 individuals by public hospitals for large-scale population studies 公立医院开展的用于大规模人群研究且人数大于 3,000 例的人类遗传资源采集活动 - Hunan Children’s Hospital Biobank 湖南省儿童医院样本库 - Export of blood samples to overseas research partners 向境外研究合作伙伴提供血液样本	Not Allowed. 不允许公司参与。 The Company, as a Foreign Entity, cannot collect, preserve, or export HGRs on its own to overseas entities or individuals. 公司作为外方单位，不得自行采集、保藏或向境外实体、个人提供人类遗传资源。	N/A 不适用	N/A 不适用
International cooperative scientific research 国际合作科学研究	- Investigator-initiated trials conducted by a Chinese public hospital with the support of a US pharmaceutical company 中国公立医院在美国制药公司支持下开展的研究者发起的临床研究 - Phase II clinical trials sponsored by a US pharmaceutical company 美国制药公司申办的 II 期临床试验 <i>Note: A simpler “filing” procedure (see below) could be adopted, rather than a full</i>	The Company could receive HGRs from Chinese Entities during such activities. 在该等活动中，公司可以从中方单位接收人类遗传资源。 This refers to the international cooperative scientific research conducted by Foreign Entities and Chinese Entities. 此特指由外方单位与中方单位共同开展的国际合作科学研究。	Approval 许可	Application is required for change of Projects and extension of approvals. 项目变更及许可延期均需申请。 Reporting to the HGRAC is required after the Project completion. 项目完成

Activity 活动	Example 示例	Involvement by the Company 公司参与形式	Process Required 所需流程	Further Action 后续行动
	<i>approval, for clinical trials for the purpose of obtaining marketing license for medical products in Mainland China if no HGR Materials are provided to Foreign Entities</i> 注：如果临床试验的目的是为药品获得中国大陆的上市许可，且不向外方单位提供人类遗传资源材料，则该临床试验可以适用更为简易的“备案”程序（见下文），而非完整的许可审批流程。	The application shall be initiated by both the Chinese Entity and the Foreign Entity. 申请应当由中方单位和外方单位共同提出。		后，需要向遗传办提交报告。
International cooperative clinical trials 国际合作临床试验	Phase II clinical trials sponsored by a US pharmaceutical company, provided that these trials are for the purpose of obtaining marketing license for medical products in Mainland China, and no HGR Materials are provided to Foreign Entities 美国制药公司申办的 II 期临床试验（但是该等试验目的只能是为药品获得中国大陆的上市许可，且不向外方单位提供人类遗传资源材料）	The Company could receive HGRs from Chinese Entities during such activities. 在该等活动中，公司可以从中方单位接收人类遗传资源。 This refers to the international cooperative clinical trials conducted by Foreign Entities and Chinese Entities for the purpose of obtaining marketing license for medical products in Mainland China (only applicable when NO HGR Material will be provided to Foreign Entities, otherwise the “Approval” procedure of “International cooperative scientific research” as mentioned above will apply). 此特指为药品获得中国大陆的上市许可而由外方单位与中方单位共同开展的国际合作临床试验（仅适用于不向外方单位提供人类遗传资源材料的情形，否则应适用上述“国际合作科学研究”的“许可”程序）。 The application shall be initiated by both the Chinese Entity and the Foreign Entity. 申请应当由中方单位和外方单位共同提出。	Filing 备案	Application is required for change of Projects and extension of approvals. 项目变更及许可延期均需申请。 Reporting to the HGRAC is required after the Project completion. 项目完成后，需要向遗传办提交报告。

Activity 活动	Example 示例	Involvement by the Company 公司参与形式	Process Required 所需流程	Further Action 后续行动
Provision of HGR Data or access to HGR Data to Foreign Entities 向外方单位提供人类遗传资源信息或信息访问权限	Sharing DNA sequencing data (HGR Data) with the overseas research partners for joint analysis 与境外研究合作伙伴共享DNA测序数据（人类遗传资源信息）以进行联合分析	The Company could receive HGRs from Chinese Entities during such activities. 在该等活动中，公司可以从中方单位接收人类遗传资源。 This refers to providing HGR Data (not HGR Materials) or the access to HGR Data by Chinese Entities to Foreign Entities. 此特指中方单位向外方单位提供人类遗传资源信息（非人类遗传资源材料）或开放对该信息的访问权限。 The application shall be initiated by the Chinese Entity (as mentioned above, Foreign Entities cannot collect, preserve or export HGRs, so the Company cannot be the applicant). 申请应由中方单位提出（如上文所述，外方单位不得采集、保藏或向境外提供人类遗传资源，因此公司不能作为申请人）。	Prior reporting and submission of backup copies of HGR Data 须完成事前申报并提交人类遗传资源信息备份。 <i>Note: The requirement s mentioned in Section 6 of the Policy (International Transfer) shall also be met if applicable</i> 注：如果适用，还应满足本政策第6条（跨境传输）规定的要求。	Reporting is required for change of matters already reported. 已报告事项发生变更时需另行报告。

- Exception of the above processes:** Collecting and preserving human substances such as organs, tissues and cells and carrying out related activities for the purposes of clinical diagnosis and treatment, blood collecting and supplying services, crime investigation, doping detection and funeral and interment are not subject to the above processes (Please note that other laws may apply).
上述流程的例外情形：为临床诊疗、采供血服务、侦查犯罪、兴奋剂检测和殡葬等目的，采集、保藏人体器官、组织、细胞等人体物质及开展相关活动，不适用上述流程（请注意，可能适用其他法律）。
- Patent ownership:** The China HGR Regulations request to adopt a specific patent ownership mechanism in certain scenarios, so the Company shall ensure to use the standard contract template or clause approved or guidance given by the Legal and Compliance Department of the Company.
专利权归属：中国关于人类遗传资源的相关法规要求在某些情形下适用特定的专利权归属机制，因此，公司应确保使用其法律合规部门批准的标准合同模板或条款，或遵循其提供的指引。

4. Legal Implications for Violation of China HGR Regulation

违反中国关于人类遗传资源的相关法规的法律后果

Violations of China HGR regulations may result in administrative penalties for the Company and the responsible individual. In serious cases, criminal liabilities may also apply; for example, persons exporting HGR Materials to the overseas without approvals may be charged with crime of smuggling. Therefore, the Project team should place high priority on HGR compliance issues.

违反中国关于人类遗传资源的相关法规可能导致公司及相关责任人员受到行政处罚。情节严重的，还可能追究刑事责任；例如，未经许可将人类遗传资源材料出境至境外的人员，可能构成走私罪。因此，项目团队应高度重视人类遗传资源合规事宜。

5. External Third-Party Management

外部第三方管理

When the Company sponsors or conducts any activities involving the collection, preservation, utilization, or external provision of HGRs, it must, prior to commencement, confirm with all cooperating external third parties the relevant requirements under the China HGR Regulation. The Company shall ensure that such external third parties provide HGRs strictly in compliance with the China HGR Regulation, and shall require their cooperation in assisting the Company in completing all filings, approvals, and related procedures necessary under the China HGR Regulation (where applicable to the Company).

当公司申办或开展任何涉及人类遗传资源采集、保藏、利用或对外提供的活动时，必须在活动开始前，与所有合作的外部第三方确认中国关于人类遗传资源的相关法规项下的相关要求。公司应确保该等外部第三方严格依照中国关于人类遗传资源的相关法规提供人类遗传资源，并要求其协助公司完成该法规要求的所有备案、许可及相关程序（如果适用于公司）。

6. Responsibilities

职责

The Project Lead for each activity involving the collection, preservation, utilization, or external provision of HGRs shall serve as the primary person responsible for HGR compliance for the relevant project. This responsibility includes ensuring that all activities, including those performed by external third parties, including Sites, CROs, vendors, and other external partners, are conducted in full compliance with the Applicable Law and this Policy. The Project Lead must consider HGR compliance matters at all key project milestones and proactively oversee all external third parties by conducting due diligence on their HGR compliance frameworks, ensuring contracts explicitly mandate adherence and grant audit rights, and verifying that their personnel are appropriately trained.

涉及人类遗传资源采集、保藏、利用或对外提供的各项活动的项目负责人，应作为相关项目中人类遗传资源合规的首要责任人。其具体职责包括确保所有活动（包括由研究中心、合同研究组织、供应商及其他外部合作伙伴等外部第三方执行的活动）完全按照适用法律及本政策开展。项目负责人必须在所有关键项目里程碑考量人类遗传资源合规事宜，并通过以下方式主动监督所有外部第三方：对其人类遗传资源合规框架进行尽职调查；确保合同明确要求对方遵守规定并授予审计权；以及核实其相关人员已接受适当培训。

HGR compliance must be integrated into the project lifecycle. The Project Lead and the project team are responsible for confirming all necessary HGR procedures are initiated at the following project milestones (as set out in Section 7 of the Addendum). The associated considerations in Section 7 hereunder serve as a mandatory reference guide.

人类遗传资源合规必须融入项目生命周期。项目负责人及项目团队应负责在以下项目关键里程碑（参见本附录第7条）确认已启动所有必要的人类遗传资源程序。下文第7条中的相关考量事项应作为强制性参考指南。

Project Lead refers to the team leader initiating the activities involving the collection, preservation, utilization, or external provision of HGRs, which should be primary responsible person for HGR compliance as per the current HGR management framework.

项目负责人指启动涉及采集、保藏、利用或对外提供人类遗传资源的活动的团队负责人，根据现行人类遗传资源管理框架，该项目负责人应为人类遗传资源合规事宜的首要责任人。

To facilitate this process, which is a pre-condition for any HGR-related activity, the Project Lead must engage with Sites, CROs, and other external consultants from the project's inception to understand and initiate the required compliance process for every single activity, particularly those operating on a tight schedule. For any aspect that is unclear, the Project Lead shall consult with the Company's Legal and Compliance Department.

为确保此项流程顺利推进，并满足开展任何人类遗传资源相关活动的前提，项目负责人必须从项目启动之初便与研究中心、合同研究组织及其他外部顾问进行接洽，以明确并启动每项具体活动所需的合规流程，特别是那些时间紧迫的活动。如果有任何不明确之处，项目负责人应咨询公司法律合规部门。

Note: For example, in a clinical trial, the Site would be familiar with such processes and has strong influence over the same; therefore, the Project Lead (or the CROs engaged by the Company) should consult with the Site in advance as early as possible and provide necessary support to ensure that the HGR-related process will move forward smoothly.

注：例如，在临床试验中，研究中心通常会熟悉该等流程并可以对这类流程产生重要影响；因此，项目负责人（或公司聘用的合同研究组织）应尽早提前与研究中心进行磋商，并提供必要支持，以确保人类遗传资源相关流程顺利推进。

7. Key Project Milestones and Procedure

关键项目里程碑和流程

To ensure compliance with the China HGR Regulation, the project team of the Company shall remember to consider whether any HGR-related procedures need to be processed at the following key timing points (with some key considerations as a reference):

为确保遵守中国关于人类遗传资源的相关法规，公司项目团队应谨记在下列关键时间点，考量是否需要办理任何人类遗传资源相关程序（以下列出的关键考量事项可以作为参考）：

Project Initiation 项目启动	Project Change 项目变更	Upcoming Approval Expiry 许可即将到期	Project Completion 项目完成
- Whether any HGR is involved? 项目是否涉及任何人类遗传资源？ - Can the Company participate in the Project? 公司能否参与该项目？ - Who is the Chinese Entity, and who is the Foreign Entity? 中方单位与外方单位分别是谁？ - Which HGR-related process applies to the Project? 项目适用哪种人类遗传资源相关流程？	- What is changed in the Project? 项目发生了哪些变更？ - Will this trigger new application (some minor changes might be exempted from new application)? 该变更是否会触发新的申请（某些轻微变更是否可以豁免申请）？	- When should the parties apply for extension of the approval? 相关方应在何时申请许可延期？ - Who should initiate the HGR-related process? 应由谁启动人类遗传资源相关流程？	- Whether reporting to the HGRAC is required for the Project completion? 项目完成后是否需要向遗传办提交报告？ - How to dispose of the HGR processed by the Company during the Project? 项目期间由公司处理的人类遗传资源如何处置？

Project Initiation 项目启动	Project Change 项目变更	Upcoming Approval Expiry 许可即将到期	Project Completion 项目完成
Who should initiate the HGR-related process? 应由谁启动人类遗传资源相关流程?	Who should initiate the HGR-related process? 应由谁启动人类遗传资源相关流程?		Who should initiate the HGR-related process? 应由谁启动人类遗传资源相关流程?

Exhibit C Jurisdictional Addendum 附件 C 司法管辖区附录

I. EU/EEA 欧盟/欧洲经济区

1. Purpose 宗旨

This EU/EEA Jurisdictional Addendum (“**Addendum**”) explains how Structure Therapeutics Inc. and its affiliates (hereafter “**Company**”) should manage any Processing of Personal Data in a responsible manner, taking into account the fundamental principles of Data Protection Law and meeting all of its applicable obligations.

本欧盟/欧洲经济区司法辖区附录（下称“**附录**”）旨在规范Structure Therapeutics Inc. 及其关联公司（以下合称“**公司**”）处理任何个人数据的行为，确保其以负责任的方式进行管理，同时遵循数据保护法的基本原则并履行所有相关义务。

As part of its activities, Company is committed to:

对于作为其经营活动组成部分的个人数据处理活动，公司承诺：

- conduct business in compliance with the applicable Data Protection Law and any national laws that supplement them;
在开展业务时遵守适用的数据保护法及补充性国内法；
- protect and enforce Data Subjects’ rights;
保护并落实数据主体的权利；
- take all steps and actions necessary to protect Data Subjects from the risks of a Data Breach.
采取一切必要措施与行动，保护数据主体免受数据泄露风险。

This Addendum demonstrates the accountability principle described in the Data Protection Law.
本附录体现了数据保护法所规定的问责原则。

2. Applicability 适用范围

This Addendum only applies to Company data processing activities related to following Data Protection and Privacy Law applicable to Company:

本附录仅适用于公司根据其适用的以下数据保护与隐私法律开展的数据处理活动：

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data and repealing Directive 95/46/EC: the General Data Protection Regulation (“GDPR”);
欧洲议会和欧盟理事会于2016年4月27日颁布的关于在个人数据处理方面保护自然人以及此类数据的自由流动并废除第95/46/EC号指令的欧盟第2016/679 号条例（即《通用数据保护条例》（“GDPR”））；
- any additional Applicable Laws.
任何其他适用法律。

This Addendum applies to any and all activities involving the processing of Personal Data (including Personal Data made public by the Data Subject) by or on behalf of Company, and in any format, whether electronic or paper, regardless of storage location and means (e.g., smartphone, laptop, cloud, etc.)

公司或其代表实施的一切个人数据（包括数据主体自行公开的个人数据）处理活动，不受数据载体（电子或纸质）、存储位置与存储方式（如智能手机、笔记本电脑、云端存储等）所限，均适用本附录。

This Addendum does not apply to data of deceased persons (unless otherwise applicable by national law) or anonymous data.

但已故人员的数据（除国内法另有规定外）或匿名化数据，不适用本附录。

All Company Personnel are expected to adhere to this Addendum.

所有公司人员均须遵守本附录规定。

3. Key Roles and Responsibilities 主要角色和职责

Role 角色	Responsibility 职责
Company Personnel 公司人员	Have read and understand this Addendum and comply with its terms. 阅读并理解本附录，遵守附录规定。 Ensure that Personal Data is treated confidentially. 确保个人数据受到保密处理。
Data Protection Officer (DPO) 数据保护官（DPO）	Provides advice regarding Company's obligations and monitors compliance with the Applicable Data Protection Law. 就公司履行数据保护义务提供建议。 Acts as point of contact for Data Subject Requests, Data Breach reporting, and Data Protection Authority (DPA) inquiries. 充当数据主体请求、数据泄露报告及数据保护机构（DPA）问询的联系人。
Data Protection Representative (DPR) 数据保护代表（DPR）	Facilitates enforcement of Applicable Data Protection Law applicable in the relevant region and oversees communication with DPAs and Data Subjects (where relevant). 推动相关区域内对适用数据保护法的实施工作，并监督与数据保护机构及数据主体的沟通工作（如涉及）。 Ensures records of Processing activities are available to DPAs upon request. 确保按照数据保护机构的要求提供数据处理活动的相关记录。
Department Head 部门负责人	Are responsible for implementing the Addendum within their business areas and ensuring strict adherence by their employees or subordinates. 在其业务范围内负责本附录的落地实施，确保其员工或下属严格遵守本附录。

4. Definitions and Abbreviations 定义和缩写

Terminology & Abbreviation 术语和缩写	Definition 定义
Data Protection Authorities (DPAs) 数据保护机构 (DPA)	means supervisory authorities appointed by the Member States that implement and enforce Applicable Data Protection Law. 指由成员国指定负责实施并强制执行适用数据保护法的监管机构。
Data Protection Impact Assessment (DPIA) 数据保护影响评估 (DPIA)	means assessment of the impact of data processing operations identifying and minimizing risks regarding the rights and the freedoms of Data Subjects. 指对数据处理操作的影响进行的评估, 旨在识别并最小化对数据主体的权利和自由产生的风险。
Applicable Data Protection Law 适用数据保护法	means law (either national laws and/or local regulations) in force that apply to the Processing of Personal Data by Company. 指公司处理个人数据时适用的现行法律 (包括国家法律和/或地方性法规)。
Data Protection Officer (DPO) 数据保护官 (DPO)	means a person with expert knowledge of relevant Data Protection Law and practices advising and assisting the Data Controller or Data Processor and monitoring internal compliance with said legislation. 指具备相关数据保护法与实践专业知识的人员, 负责为数据控制者或数据处理者提供咨询与协助, 并监督其内部对该等法律的遵守情况。
Data Protection Representative (DPR) 数据保护代表 (DPR)	means the Data Protection Representative in the EU (or other applicable jurisdiction(s)) explicitly designated by a written mandate of Company to act on its behalf regarding its obligations under the Applicable Data Protection Law. 指公司通过书面授权明确指定的欧盟地区 (或其他适用的法域) 的数据保护代表, 负责代表其履行适用数据保护法规定的义务。
Data Subject Request (DSR) 数据主体请求 (DSR)	means a request sent by the Data Subject(s) to exercise one or more of their rights. 指数据主体为行使其享有的一项或多项权利而提出的请求。
Personal Data Breach 个人数据泄露	means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored, or otherwise processed. 指导致处于传输、存储或其他处理阶段的个人数据被意外

	或非法销毁、丢失、篡改、未经授权披露或访问的安全事件。
Privacy Notice 隐私声明	means a document that sets out all the information regarding the processing of Personal Data in order to make the processing of Personal Data transparent for the Data Subject. 指载明关于个人数据处理的全部信息的文件，其目的在于向数据主体披露个人数据处理情况。
Sensitive Personal Data 敏感个人数据	means sensitive Personal Data (or special categories of Personal Data) are Personal Data that require a higher level of protection under Applicable Data Protection Law. 敏感个人数据（或特殊类别的个人数据）指根据适用数据保护法的规定需要更高保护层级的个人数据。 <i>i.e.</i> Personal Data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; and the processing of genetic or biometric data to identify a natural person uniquely, data concerning health; or data concerning a natural person's sex life and sexual orientation; and data relating to criminal convictions and offenses. //揭示种族或民族出身、政治观点、宗教或哲学信仰、工会成员资格的个人数据；为唯一识别自然人而处理的基因或生物识别数据、健康相关数据、有关自然人性生活或性取向的数据，以及与刑事定罪和犯罪相关的数据

All other terms used in this Addendum shall have the meaning ascribed to them by Data Protection Law as well as their potential modifications and interpretations.

本附录中使用的所有其他术语，均应具有数据保护法及其后续修订与解释所赋予的含义。

5. Protecting Personal Data **保护个人数据**

5.1. Compliance with Data Protection Principles **遵守数据保护原则**

Company Personnel shall process Personal Data fully respecting the following principles:
公司人员处理个人数据时，应严格遵循下列原则：

5.1.1. Accountability **问责原则**

Ensuring it is possible to demonstrate compliance with Applicable Data Protection Law at any time.

确保能够随时证明其遵守适用数据保护法的要求。

5.1.2. Lawfulness, fairness, and transparency **合法、公平、透明原则**

Personal Data must be processed lawfully, fairly, and transparently about the Data Subjects.
处理个人数据时必须遵循合法、公平、透明原则对待数据主体。

- Company must have a valid legal basis to process Personal Data. The Data Controller chooses the lawful basis based on the applicable Data Protection Law and as relevant to the purpose

of each Data Processing activity.

公司必须具有处理个人数据的有效法律依据。数据控制者应依据适用数据保护法，并根据每项数据处理活动的目的选择法律依据。

- Company will document the selected legal basis in the records of Processing activities.
公司应在处理活动记录中载明所选择的法律依据。
- The complete information about the Processing of relevant Personal Data shall be made readily available to Data Subjects (Privacy Notice), as appropriate, unless exemptions are allowed by the Applicable Data Protection Law.
有关个人数据处理的完整信息，应通过隐私声明等方式随时向数据主体提供，适用数据保护法允许豁免的除外。

5.1.3. Purpose limitation

目的限制原则

Personal Data may only be collected by Company Personnel for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those initial purposes.

公司人员仅可为明确规定的具体且合法的目的收集个人数据，不得采用与该等目的不相符的方式进行处理。

5.1.4. Data minimization

数据的最小必要原则

Personal Data processed by Company Personnel must be adequate, relevant, and limited to what is necessary for the purposes for which those Personal Data are processed.

公司人员对个人数据的处理应当与其目的充分相关且必要，且应限制在实现该目的所需的范围内。

5.1.5. Accuracy

准确性原则

Personal Data must be accurate and, where necessary, kept up to date by Company Personnel. Company. Company Personnel will take every reasonable step to ensure that inaccurate Personal Data are either erased or rectified without undue delay.

个人数据必须准确，并在必要时由公司人员保持更新。公司人员应采取一切合理措施，确保不准确的个人数据得到及时删除或更正。

5.1.6. Storage Limitation

存储期限限制原则

Personal Data that enables identification of Data Subjects must be kept for no longer than is necessary for the purpose for which the Personal Data is being processed and as required by other legislation specifically applicable to each Processing activity. This personal data includes but not limited to the legislation applicable to the development and commercialization of medicinal products.

对于能够识别数据主体身份的个人数据，其保存期限不得超过实现处理目的所必需的时间，且应符合各项处理活动具体适用的其他法律规定期限。前述个人数据所涉法律包括但不限于适用于药品研发和商业化的法律法规。

The detailed data retention and data removal requirements will be specified in the respective Company procedures. These procedures will set out how Company commits itself to comply with the retention periods defined by the Data Protection Law, where applicable and describe Company's good practices regarding actions to take when destroying paper and/or electronic Personal Data.

数据保留和数据删除的具体要求将在公司相关制度中予以明确。这些制度将阐明公司遵守数据保护法（如适用）规定留存期限的承诺，并阐述公司在销毁纸质和/或电子版个人数据时采取的合规行动实践。

Company will ensure applicable retention periods are kept up to date in the records of Processing activities.

公司将确保在处理活动记录中及时更新适用的留存期限。

5.1.7. Data security

数据安全原则

Personal Data must be processed using appropriate security measures for those Data, including protection against unauthorized or unlawful Processing and against accidental loss, destruction, or damage, using appropriate technical and organizational measures.

处理个人数据时必须采取适当的安全防护措施，包括通过相应的技术和组织措施防止数据遭受未经授权或非法处理，以及防止数据意外丢失、毁损或损坏。

5.1.8. Data Subject rights

数据主体权利

Applicable Data Protection Law grant Data Subjects specific rights.

适用数据保护法赋予了数据主体特定权利。

The nature and details related to the exercise of these rights will be described in the Company procedure, which will detail the Controller's required actions within the timelines stated in the applicable Data Protection Law.

该等权利的性质与具体行权细则均将在公司制度中载明，且其将详细规定数据控制者须在适用数据保护法规定的时限内采取的行动。

5.2. Obligations

义务

5.2.1. Data Protection by Design and by Default

数据保护设计和数据默认保护

- Company has put in place and maintains up to date legal (i.e. contracts), organizational (i.e. policies, procedures, templates, guidelines, etc), and technical (i.e. IT security settings and protocols, etc) measures that ensure that data protection and privacy matters are considered throughout the entire life cycle of any (new) product, system, project or process that involved the Processing of Personal Data, starting from the planning phase and ending with destruction or anonymization of the Personal Data.

公司已制定并持续更新法律（如合同）、组织（如附录、程序、模板、指南等）以及技术（如信息技术安全设置与协议等）措施，确保在涉及个人数据处理的任何（新）产品、系统、项目或流程的完整生命周期（从规划阶段开始至个人数据销毁或匿名化处理为止）持续贯彻数据保护与隐私考量。

- Measures shall consider the nature of data processed. Sensitive Personal Data and data of children shall rely on the more secure protection rules.

采取措施时应充分考虑所处理数据的性质。敏感个人数据与儿童相关数据应遵循更严格的安全保护规则。

- “Privacy by default” implies that once a (new) product, system, project, or process has been released, the strictest privacy settings should apply by default.

“数据默认保护”要求（新）产品、系统、项目或流程一经发布，即应默认采用最严格的隐私设置。

5.2.2. Data Protection Awareness and Training

数据保护意识和培训

Company ensures that all its Personnel receive training on this Addendum and the Applicable Data Protection Law relevant to their function. The purpose of this training is to encourage a culture of Data Protection throughout the whole Company organization and to make individuals aware of their responsibilities in managing Personal Data, that they know where the risks lie when they

process Personal Data and that they must strictly follow this Addendum.

公司应确保按照具体职责为全体人员安排相应的本附录以及适用数据保护法培训。该项培训的目的是在全公司范围内培育数据保护文化，使员工充分认识其在管理个人数据过程中应承担的责任，明确个人数据处理活动的风险所在，并严格遵守本附录规定。

5.2.3. Data Protection Officer

数据保护官

Company has appointed the DPO to act as the first point of contact for any Data Protection matters. Specifically, the advice of the DPO shall be requested in the scope of and for in relation to:

公司已任命数据保护官作为处理所有数据保护事宜的首要联系人。特别是在以下事项范围内，应征求数据保护官的意见：

- review of data protection and privacy wording included in any information to be provided to Data Subjects before its finalization (including, but not limited to the patient information);
在最终定稿前，审阅拟提供给数据主体的任何信息（包括但不限于患者信息）中包含的数据保护与隐私条款；
- review of data protection and privacy wording included in any contract, agreement, terms of use, or any other contractual arrangement;
审阅任何合同、协议、使用条款或其他合约安排中包含的数据保护与隐私条款；
- review of the records of processing activities;
审阅数据处理活动记录；
- evaluation and reporting of the Data Breaches;
评估并报告数据泄露事件；
- drafting of the DPIA;
起草数据保护影响评估；
- (where appropriate) be prior consulted in the case of the DPIA revealing that the processing operation still presents a high risk to the data subject's personality or fundamental rights;
（在适当情况下）如果数据保护影响评估（DPIA）显示该处理操作仍然对数据主体的人格或基本权利构成高风险，应事先进行咨询；
- (where appropriate) take part in the regulation of the processing activities;
（在适当情况下）参与对处理活动的规范管理；
- consideration and handling of Data Subject Requests.
审议并处理数据主体请求。

The DPO can be contacted at: structuretherapeutics.dpo@mydata-trust.info

数据保护官的联系方式: structuretherapeutics.dpo@mydata-trust.info

5.2.4. Appointment of Data Protection Representative

数据保护代表的任命

As Company is established outside of the relevant region/country or countries), it has appointed a Data Protection Representative in the EU.

由于公司设立在欧盟境外的相关地区/国家，因此公司在欧盟境内任命了数据保护代表。

The name and contacts of the Data Protection Representative are:

Name: MyData-Trust France

Address: Rue de Rennes, 140b, 75006 Paris (FRANCE)

Contact: structuretherapeutics.dpr.eu@mydata-trust.info

有关数据保护代表的姓名与联系信息，请参见：

姓名: MyData-Trust France

地址: Rue de Rennes, 140b, 75006 Paris (FRANCE)

联系方式: structuretherapeutics.dpr.eu@mydata-trust.info

5.2.5. Appointment of Processors

处理者的指定

Company will only use Processors which guarantee that their systems and practices meet the requirements of the Applicable Data Protection Law. Company appoints its Processors using a Data Processing Agreement that complies with the requirements of the Applicable Data Protection Law and any existing contractual obligations (i.e., upstream agreement). If they do not contradict the Applicable Data Protection Law.

公司仅使用能够保证系统与实践符合适用数据保护法要求的数据处理者。公司应通过签订符合适用数据保护法要求和任何现有合同义务（即上游协议）的数据处理协议，指定数据处理者。处理者不得违反适用数据保护法的规定。

5.2.6. Records of Processing Activities

处理活动记录

Company will maintain records of processing activities in accordance with Applicable Data Protection Law.

公司应按照适用数据保护法的规定维护处理活动记录。

These records will be disclosed to DPAs upon request.

该等记录应在数据保护机构要求时予以披露。

5.2.7. Cooperation with the DPAs

与数据保护机构的协作

Company, all its Personnel, and its DPR, will cooperate, on request, with DPAs in the performance of their tasks and in case of any inspection.

公司、其全体人员及其数据保护代表，应在数据保护机构执行职务或开展检查时按照数据保护机构的要求履行协作义务。

5.2.8. Security of Processing

处理的安全性

Company has implemented appropriate technical and organizational measures to protect any Personal Data against accidental or unlawful destruction or loss, alteration, unauthorized disclosure, or access.

公司已实施适当的技术措施与组织措施，以保护个人数据免遭意外或非法破坏或丢失、篡改、未经授权的披露或访问。

These implemented measures are dependent on the nature of the Processing and Personal Data (i.e., Sensitive Personal Data) and are listed in the records of processing activities.

所实施的具体措施应取决于处理活动及个人数据的性质（如涉及敏感个人数据），并在处理活动记录中列明。

5.2.9. Data Breaches and Notifications

数据泄露和通知

Where Personal Data Breach occurs, Company will identify, and evaluate the risk to the rights and freedoms of Data Subjects and, where applicable, report the Breach to the DPAs within 72 hours and notify the affected Data Subjects without undue delay. This Breach analysis and reporting will be managed by Company's relevant procedures. All Personal Data Breaches will be recorded in the Data Breach log.

如果发生个人数据泄露事件，公司应及时识别并评估对数据主体权利与自由造成的风险，并视情况在72小时内向数据保护机构报告，同时立即通知受影响的数据主体。关于此类泄露事件的分析与报告工作将依照公司相关制度进行管理。所有个人数据泄露事件均须记录在数据泄露日志中。

5.2.10. Data Protection Impact Assessment

数据保护影响评估

As Data Controller, and where, in the absence of appropriate safeguards, the processing activities are likely to result in a high risk to the rights and freedoms of Data Subjects (especially where new technologies will be used), Company will conduct a DPIA. The DPIA shall be performed before initiating concerned Processing activities and shall be regularly and at least every three years reviewed and updated to reflect any changes.

作为数据控制者，在缺乏适当保障措施的情况下，开展数据处理活动可能会对数据主体的权利与自由造成高风险（特别是在采用新技术的场景下），因此，公司应开展数据保护影响评估。该数据保护影响评估应在相关处理活动启动前开展，并定期（至少每三年）进行审查更新，以及时反映任何变更情况。

5.2.11. Personal Data Transfer and Disclosures

个人数据传输和披露

Company is accountable for and ensures the privacy protection for Personal Data when they are transferred to other organizations and specifically across country borders, in accordance with Data Protection Law.

根据数据保护法的规定，公司应负责并确保在将个人数据传输至其他组织（特别是跨境传输）的情况下保护个人数据的隐私。

5.3. Scientific Research

科学研究

- Where specifically allowed by the Applicable Data Protection Law, exemptions, including Data Subject's rights, may apply to scientific research.
在适用数据保护法明确允许的情况下，科学研究可以适用包括数据主体权利在内的豁免条款。
- Personal Data may be stored for an extended period if the Personal Data will be processed solely for the scientific purpose in accordance with applicable legislation and subject to appropriate safeguards. If the Personal Data is no longer required to meet the original purpose of the processing, it will either be deleted (unless it would be impossible or involve disproportionate effort) or made anonymous.
如果仅出于科学研究目的处理个人数据，且符合适用法律规定并采取了适当保障措施，可以延长个人数据的存储期限。如果不再需要个人数据来满足原处理目的，应将个人数据予以删除（除非删除在客观上不可行或需付出不成比例的努力），或进行匿名化处理。
- Company may use sets of Data previously collected (i.e., for other projects) only where permitted by Applicable Data Protection Law.
公司仅在适用数据保护法允许的情况下，方可使用既往收集的数据集（例如，其他项目的数据集）。
- In general, any re-use of datasets for research projects different from those for which the Personal Data was initially collected or received shall be considered an independent Data Processing activity and can only occur where compatible with initial purposes.
原则上，将数据集用于与初始收集或接收该个人数据时目的不同的研究项目，均应视为独立的数据处理活动，且仅在与初始目的相符时方能使用。
- Further processing for scientific purposes performed according to applicable legislation is not considered incompatible with the initial purposes.
为科学目的进行且符合适用法律的后续处理活动，不视为与初始目的相抵触。

6. Enforcement

附录执行

All Company Personnel are expected to know, respect, and apply this Addendum when Processing Personal Data.

全体公司人员在处理个人数据时，均应知悉、遵守并执行本附录。

The Company's Legal and Compliance Department is responsible for providing the necessary guidance, training, and assistance to support all Company Personnel in meeting their obligations under this Addendum.

公司的法律合规部承担提供必要指导、培训与协助，以支持全体公司人员履行本附录规定的责任。

All Company Personnel must participate in periodic Data Protection training.

全体公司人员必须定期参加数据保护培训。

Company monitors compliance with this Addendum by performing internal Data Protection Audits and monitoring the reported non-compliance.

公司通过开展内部数据保护审计及监控已报告的不合规情况，监督本附录的遵守情况。

Corrective and preventive action plans will be developed and implemented to address deviations and nonconformities observed by any audit.

如果在审计工作中发现偏差与不合规项，应制定并落实纠正与预防措施计划。

Company will hold Company Personnel accountable for violations of this Addendum and any supporting standards and procedures. Violations of this Addendum and any supporting standards and procedures may result in disciplinary action, including termination of employment or contract.

如果公司发现公司人员违反本附录及相关配套标准与程序，将追究其责任。违反本附录及相关配套标准与程序，可能招致纪律处分，包括终止雇佣关系或劳动合同。

7. References and related documents

参考及相关文件

The EU General Data Protection Regulation (GDPR), Regulation (EU) 2016/679;
欧盟《通用数据保护条例》(GDPR)，即欧盟第 2016/679 号条例；

Other Data Privacy Law.
其他数据隐私法律。