

TOL

To verify whether the **privacy policy** of BOSS直聘 complies with the selected **PIPL regulations** provided, the following points have been checked against Articles 23 to 27 of the **PIPL** regulations. I've broken this into an analysis for compliance for each regulation article you provided:

Regulation: 第二十三条

Key point:

The handler of personal information must **notify individuals** and obtain **separate consent** before sharing personal information with other handlers. The receiving party must adhere to the notified scope for the information's purpose, methods, and types. If the purpose or methods are changed, the receiving party must obtain consent again.

Compliance Check:

- The policy specifies that before sharing personal information with third-party partners (e.g., 附件简历, login using external APIs, third-party SDKs), **user consent is required**. For sharing with platforms like "店长直聘," the policy explicitly mentions "单独授权" (separate consent) is necessary.
- The policy states that any deviations from the original use of information will require prior user consent.

 **Compliant.**

Regulation: 第二十四条

Key point 1:

Automated decision-making must ensure **transparency, fairness, and non-discriminatory outcomes** and must not subject people to unreasonable differential treatment in terms of prices or other conditions.

Key point 2:

When using automatic decision-making for targeted advertising or commercial marketing, individuals must have the option **not to be targeted** or a way to **refuse easily**.

Compliance Check:

- The privacy policy specifies individuals can disable **personalized recommendations**, including ads and marketing, via clear settings paths (e.g., 个性化推荐 options under 隐私保护).
- Transparency of algorithm recommendations is addressed, explaining its limitations and inviting user feedback in case of dissatisfaction (e.g., feedback for 对算法推荐不满).

- There is no evidence or mention of any unfair price discrimination based on automated decisions.

✅ ****Compliant.****

****Regulation: 第二十五条****

Key point:

Personal information must not be publicly disclosed without ****separate consent****.

Compliance Check:

- The policy explicitly states that personal information will not be disclosed or processed beyond stated purposes unless ****单独同意**** (explicit consent) has been obtained, e.g., the user's BOSS直聘简历 or contact details not being shared unless the user initiates sharing with a招聘者.
- Elements related to user-generated content or 社区信息 are covered under explicit warnings (users are required to confirm sharing intentions when information is publicly posted).

✅ ****Compliant.****

****Regulation: 第二十六条****

Key point:

Video and image collection in public places must be ****necessary for public safety****, installed following ****state regulations****, with clear signage, and used solely for their stated purpose unless otherwise consented.

Compliance Check:

- The privacy policy does not reference the collection of ****public video capture**** data or the installation of public surveillance equipment. This regulation does not appear relevant to the privacy policy's scope.

⚠️ ****Not Applicable.****

****Regulation: 第二十七条****

Key point:

Handlers may process self-disclosed or legally public personal information within reasonable limits unless the individual objects. For such data impacting rights significantly, further consent is required.

Compliance Check:

- The policy states that information shared on "有了社区" or posted publicly is entirely at the user's discretion, meaning users **voluntarily consent** to the processing of public information for that purpose.
- Users are explicitly informed of their option to limit visibility or disable related personalization features via settings. Consent for impactful further processing is also ensured.

 **Compliant.**

Final Assessment

Based on just the specified regulations (Articles 23–27 of PIPL), **the privacy policy of BOSS直聘 is compliant** with the requirements outlined. No major violations or areas of non-compliance have been identified in relation to these provisions.

If additional elements or regulations need verification, feel free to specify!

NEU

Based on the regulations provided and the Privacy Policy disclosed for BOSS直聘, I have carefully reviewed compliance against each PIPL regulation as outlined. Here are the observations:

1. 第二十三条: 向其他个人信息处理者提供个人信息

- **Requirement**: Personal information controllers must inform the individual about the recipient's name, contact information, purpose, manner of processing, and category of personal information before obtaining separate consent.

- **Analysis**:

- The Privacy Policy discusses scenarios where information is shared with partners such as communication operators, third-party platforms (e.g., WeChat, Alipay), and SDK providers, stating they will obtain the user's **explicit consent**. It also mentions visibility into third-party sharing and processing details through links (e.g., third-party sharing lists).

- Key compliance measures: Obtaining explicit consent and informing the scope of data shared are outlined. However, specific **recipient details** like company names/contact information are mentioned indirectly (via viewing the lists), which could be seen as insufficient transparency per PIPL's strict requirements.

 **Partial compliance**: Clarify recipient details more prominently to achieve full compliance.

2. 第二十四条: 自动化决策

- **Requirement**: Decisions using personal data for automated purposes must be transparent, fair, and offer non-tailored alternatives or opt-out features for targeted recommendations/marketing.

- **Analysis**:

- BOSS直聘 offers *toggle options* to disable personalized recommendations via settings (e.g., “关闭个性化推荐” and community-related recommendations). Thus, users can decline automated targeted actions.

- Transparency on algorithm precision, limitations in recommendation fairness, and complaint options are mentioned for resolving dissatisfaction.

✅ Full compliance.

3. 第二十五条: 公开披露个人信息

- **Requirement**: Personal information controllers cannot publicly disclose the user's personal information without obtaining separate explicit consent.

- **Analysis**:

- BOSS直聘 specifies public disclosure scenarios in the “有了”社区 section, where users can opt to share voluntarily. Explicit warnings on risks of publishing others' personal information are provided, with clear user controls over “hide/show” options for visibility.

✅ Full compliance.

4. 第二十六条: 公共场所安装图像或身份识别设备

- **Requirement**: In public spaces, installation of image/data-collection devices must be necessary for public safety, must display clear signage, and use the collected data only for public security purposes unless separate consent is obtained.

- **Analysis**:

- The Privacy Policy does not highlight any practices related to *publicly installed surveillance/image collection* systems (e.g., public safety cameras). If BOSS直聘 were to engage in such practices, clarity on usage scope, signage compliance, and restricted use purposes would need explicit documentation.

⚠️ Non-applicable unless implemented in such contexts.

5. 第二十七条: 合理范围处理已公开个人信息

- **Requirement**: Publicly disclosed personal information can be processed reasonably unless the individual explicitly refuses. For cases significantly impacting personal rights, individual consent must be obtained.

- **Analysis**:

- The Privacy Policy mentions community and openly shared profiles as data subjects themselves disclose these voluntarily (e.g., “有了” Community details). Explicit opt-out controls are provided throughout privacy settings, allowing individuals to restrict visibility. Consent for significant impacts on rights (e.g., data analysis for public trends or AI modeling) is enforced.

✓ Full compliance.

Overall Compliance Evaluation

- **Fully Compliant** with: 第二十四条 (Automated decisions), 第二十五条 (Public disclosures), 第二十七条 (Processing public data).

- **Partially Compliant** with 第二十三条 (Data sharing recipient transparency).

Recommendations include providing direct and clearer details of third-party recipients' names and contacts upfront.

- **Not Applicable** to 第二十六条 unless public camera/surveillance systems are in scope.

Let me know if you need further refinements or documentation reviews.

AGG

根据提供的**《中华人民共和国个人信息保护法》(PIPL) 相关条款**和BOSS直聘的隐私政策内容，我将逐条分析是否存在这些PIPL条款的违反情况。

《个人信息保护法》第二十三条

- **要求**: 若向其他个人信息处理者提供个人信息，应告知接收方名称、联系方式、处理目的、处理方式和个人信息的种类，并取得用户单独同意。接收方处理个人信息需遵循规定的范围，若变更处理目的或方式，应重新取得用户同意。

- **隐私政策分析**:

- BOSS直聘提到信息共享场景，如：

- 与关联应用(如店长直聘)共享数据;
- 向第三方服务提供者(如虚拟电话号码服务商)分享数据。
- 声称会在共享前取得用户单独同意,并公开了[第三方共享清单](未提供具体内容查看)。
- 问题:隐私政策中没有充分说明**接收方的具体名称或联系方式**,如提到“第三方支付机构”和“虚拟电话服务商”,但未详列具体信息,可能不符合第二十三条中的“向个人告知接收方名称或联系方式”的要求。
- **结论**:存疑,潜在违规。

《个人信息保护法》第二十四条

- **要求**:利用个人信息进行自动化决策时,需保证透明性、结果公平公正,**不得在交易价格等交易条件上实行不合理差别待遇**。通过自动化决策方式进行商业营销时,需提供非个性化选项/便捷拒绝方式。重大决策影响权益时,用户有权要求解释或拒绝自动化决策。
- **隐私政策分析**:
 - 提到个性化推荐和算法推荐,包括职位匹配及求职建议。但:
 - BOSS直聘允许用户关闭个性化推荐,明确了拒绝方式。【合规】
 - 隐私政策未说明是否针对用户个体特征差异化设定**交易价格或条件**的情况(如增值会员服务)。【缺项待明确】
 - 对于重大权益影响(如推荐匹配与应聘失败的关系),未详述如何提供解释或人工干预决策的选项。【疑似违规】
 - **结论**:部分条款合规,但未完全清晰,需补充说明重大权益决策处理。

《个人信息保护法》第二十五条

- **要求**:未经个人单独同意,不得公开处理的个人信息。
- **隐私政策分析**:
 - 规定用户可通过设置调整信息隐私范围,例如简历隐藏功能和联系方式保护功能,这些机制保护个人隐私权。【合规】
 - 除有明确用户授权(如主动发布信息或接受邀请)外,未有迹象表明BOSS直聘对第三方公开用户个人信息。
 - **结论**:无明显违规。

《个人信息保护法》第二十六条

- **要求**:在公共场所安装图像采集、个人身份识别设备时,应出于公共安全需要且需显著标识,收集的信息仅能用于维护公共安全。
- **隐私政策分析**:
 - BOSS直聘的隐私政策没有提及使用图像采集设备收集公众数据的行为,涉及图像识别的部分仅限招聘者实名认证环节,并明确“核验后即删除”。【基本合规】
 - **结论**:未发现与此条相关的违规行为。

《个人信息保护法》第二十七条

- **要求**: 对于个人自行公开或合法公开的信息可在合理范围内处理, 但需尊重个人拒绝权, 且若处理已公开信息对个人权益有重大影响, 应重新取得同意。
- **隐私政策分析**:
 - 提到“有了”社区中, 用户可以主动公开信息(如昵称、职业经历、教育信息等), 并提醒用户在公开他人信息时须取得同意。【合规】
 - 未明确说明: BOSS直聘是否对公开信息造成重大影响重新取得明确授权。这部分需要补充解释。
- **结论**: 潜在的合规性不足, 需更明确说明重大影响时如何处理权限。

总结表

以下是给定法规条款的合规性判断:

法规条款	初步结论	违规/疑点原因
第二十三条	存疑	未提供所有信息接收方的具体名称和联系方式, 可能未完全满足“通知接收方”的要求。
第二十四条	部分合规, 有不足	未明确说明是否差别定价或影响交易条件, 缺少对重大权益自动化决策的解释和拒绝机制描述。
第二十五条	合规	数据公开需经个人单独授权, 已有保护机制(如设置隐藏简历及隐私联系方式)。
第二十六条	合规	未涉及公共场所图像采集和识别的相关行为。
第二十七条	部分合规, 有不足	对“重大影响”的公开个人信息, 未明确说明如何判断及重新获取用户同意。

最终判断

- BOSS直聘隐私政策在符合《个人信息保护法》方面总体较为完善, 但仍有部分条款(如第二十三条、第二十四条、第二十七条)存在潜在问题或表述不够明确, 大部分不足集中在实践适用性和告知细节上。
- 若公司未能补充相关说明或证明实际操作已完全合规, 则可能存在一定的法律风险。