

## 第五十一条(确保个人信息处理活动合规的措施)

### (一)制定内部管理制度和操作规程

✔ 符合

隐私政策中明确提到“根据《个人信息保护法》《网络安全法》等法律法规制定本政策”，并参考了国家标准（如GB/T 35273-2020），隐含了内部管理制度的存在。但未直接提及“操作规程”，需进一步补充具体操作流程的说明。

### (二)对个人信息实行分类管理

✔ 符合

隐私政策详细列举了不同场景下收集的个人信息类型（如账号注册、简历、位置信息等），并区分了求职者和招聘者的个人信息处理方式，体现了分类管理原则。

### (三)采取加密、去标识化等安全技术措施

✔ 符合

- 提到“加密简历”“虚拟电话保护服务”“去标识化处理数据”等技术措施。
- 语音转文字功能中明确“实时转文字后删除原始语音”，符合去标识化要求。

### (四)合理确定操作权限并定期培训

⚠ 部分符合

- 操作权限:隐私政策提到“仅授权必要人员访问数据”，但未明确权限分级和管理机制。
- 安全教育和培训:仅提到“对员工进行安全教育”，但未明确“定期”培训的频率或制度，需补充具体说明。

### (五)制定并实施安全事件应急预案

✔ 符合

- 单设“九、个人信息安全事件应急响应”章节，明确事件处置流程（如通知用户、上报监管部门等），符合应急预案要求。

### (六)其他措施

✓ 符合

- 通过技术手段(如权限管理、数据加密)和用户控制选项(如关闭个性化推荐)覆盖了其他合规要求。

## 第五十二条(指定个人信息保护负责人)

✓ 符合

- 隐私政策末尾明确列出个人信息保护问题专线(客服电话)和邮箱(pip@kanzhun.com), 隐含了负责人联系方式的公开。
- 需进一步补充“个人信息保护负责人姓名”及“向履行职责的部门报送”的说明(如网信部门备案), 以完全满足条款要求。

## 第五十三条(境外处理者义务)

⚠ 不适用

- BOSS直聘为境内公司(注册地北京), 无需适用该条款。

## 第五十四条(定期合规审计)

✗ 不符合

- 隐私政策未明确提及“定期合规审计”或相关机制, 需补充说明审计频率及结果应用。

## 第五十五条(个人信息保护影响评估)

✓ 符合

- 敏感个人信息处理: 明确对敏感信息(如身份证号、人脸图像、位置信息)的收集和使用场景, 并要求用户单独授权。
- 自动化决策: 在个性化推荐功能中允许用户关闭, 隐含对自动化决策的控制。
- 数据共享/跨境传输: 列举了第三方共享场景(如支付机构、虚拟电话服务商), 并说明需用户授权, 符合评估要求。
- 记录要求: 隐私政策中未明确提及“评估记录”, 需补充说明评估过程和记录保存机制。

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## 总结与改进建议

### 1. 补充内容：

- 明确“个人信息保护负责人姓名”及向网信部门报送的说明。
- 增加“定期合规审计”的具体安排(如频率、范围)。
- 在隐私政策中补充“个人信息保护影响评估”的记录机制。

### 2. 优化表述：

- 在权限管理部分细化操作权限分级制度。
- 在安全培训部分明确“定期”培训的具体周期(如每年一次)。

### 3. 其他建议：

- 在“分类管理”部分进一步说明分类标准及对应的保护措施。
- 在“用户权利”章节中增加“拒绝评估影响”时的应对措施。

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通过以上改进，BOSS直聘的隐私政策可更全面地符合PIPL的要求。

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## 一、第五十一条合规性分析

### (一)制定内部管理制度和操作规程

- 合规情况：隐私政策提到“根据《个人信息保护法》等法律法规制定本政策”，但未明确说明是否已制定具体的内部管理制度和操作规程(如数据分类、权限管理、审计流程等)。
- 建议：需补充说明内部管理制度和操作规程的具体内容或制定依据。

### (二)对个人信息实行分类管理

- 合规情况：隐私政策区分了“必要个人信息”和“非必要个人信息”(如注册需手机号，附加功能可拒绝)，但未明确说明对个人信息的分类管理措施(如敏感信息与普通信息的分类处理)。
- 建议：需明确分类管理的具体标准和实施方式。

### (三)采取加密、去标识化等安全技术措施

- 合规情况：
  - 提到“加密简历”“虚拟电话”“数据加密存储”等技术措施；
  - 对通话录音、敏感信息(如身份证号)采取了删除或匿名化处理。
- 结论：符合要求。

### (四)合理确定操作权限并定期培训

- 合规情况:
  - 提到“对员工进行安全培训”，但未明确“定期”培训的频率或记录；
  - 未说明员工权限分配的具体规则(如最小权限原则)。
- 建议:需补充权限管理制度及定期培训的证明(如培训记录)。

#### (五)制定并实施应急预案

- 合规情况:
  - 明确描述了安全事件的应急预案(如通知用户、上报主管部门、补救措施等)；
  - 提到“网络安全事件应急预案”和“安全事件响应流程”。
- 结论:符合要求。

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## 二、第五十二条合规性分析

#### 指定个人信息保护负责人

- 合规情况:
  - 提供了个人信息保护专职部门的邮箱(pip@kanzhun.com)和专线电话，但未明确披露负责人的姓名；
  - 未说明是否已将负责人信息报送履行个人信息保护职责的部门(如网信办)。
- 建议:需公开负责人姓名，并补充报送相关部门的说明。

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## 三、第五十三条合规性分析

#### 境外处理者要求

- 适用性:BOSS直聘为境内公司，不涉及境外处理者义务，无需检查。

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## 四、第五十四条合规性分析

#### 定期合规审计

- 合规情况:隐私政策未明确提及“定期合规审计”或相关审计结果。
  - 建议:需补充定期审计的实施情况或相关制度。
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## 五、第五十五条合规性分析

### 个人信息保护影响评估

- 合规情况：
  - 在处理敏感信息(如位置、通讯录)时, 要求用户“事前同意”, 但未明确说明是否进行了影响评估及记录;
  - 对自动化决策(如个性化推荐)未提及评估流程。
- 建议: 需补充说明对敏感信息处理、自动化决策等场景的影响评估记录。

## 总结与合规结论

### 符合项:

1. 加密与去标识化(第三项);
2. 应急预案(第五项);
3. 部分安全措施(如权限管理、第三方合作规范)。

### 需改进项:

1. 内部管理制度: 需明确制度文件和操作规程;
2. 分类管理: 需细化个人信息分类标准;
3. 定期培训与权限管理: 需补充定期培训记录及权限分配规则;
4. 负责人信息公示: 需披露负责人姓名并说明报送情况;
5. 合规审计: 需补充定期审计的实施说明;
6. 影响评估: 需明确对敏感信息、自动化决策等场景的评估记录。

## 建议整改方向

1. 在隐私政策中补充以下内容：
  - 内部管理制度和操作规程的制定依据;
  - 个人信息分类管理的具体标准;
  - 员工权限分配规则及定期培训记录;
  - 个人信息保护负责人的姓名及报送信息;
  - 定期合规审计的实施情况;
  - 敏感信息处理、自动化决策的影响评估说明。
2. 定期更新隐私政策, 确保与最新法规要求一致。

以上分析基于隐私政策文本内容, 实际合规性需结合企业内部制度文件进一步验证。

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To verify whether the given parts of the **BOSS直聘 (BOSS Zhipin)** privacy policy comply with the **PIPL (Personal Information Protection Law)** regulations listed, we will analyze each relevant regulation and check if the privacy policy addresses the requirements. Below is the compliance verification:

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## Regulation 第五十一条 (Article 51)

### Requirements:

Personal information processors must take measures to ensure compliance with laws and regulations, prevent unauthorized access, and protect against leakage, tampering, or loss of personal information. Specific measures include:

1. **Internal management systems and operating procedures.**
2. **Categorized management of personal information.**
3. **Encryption, de-identification, and other security measures.**
4. **Reasonable access control and regular employee training.**
5. **Emergency response plans for personal information security incidents.**
6. **Other measures required by laws and regulations.**

### Compliance Check:

- The privacy policy mentions **internal management systems** and **operating procedures** (e.g., security measures like SSL encryption, HTTPS protocol, and access control mechanisms).
- It discusses **categorized management** of personal information (e.g., separating sensitive and non-sensitive data, and handling different types of information based on their purpose).
- **Encryption and de-identification** are explicitly mentioned (e.g., encryption of data during transmission, anonymization of data for statistical analysis).
- **Access control** is implemented (e.g., only authorized personnel can access personal information).
- The policy outlines **employee training** (e.g., security training courses for employees).
- It mentions **emergency response plans** (e.g., cybersecurity incident response and notification procedures).

**Conclusion:** The privacy policy complies with Article 51.

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## Regulation 第五十二条 (Article 52)

### Requirements:

If the volume of personal information processed reaches a threshold set by the Cyberspace Administration of China (CAC), the processor must designate a **personal information protection officer** responsible for supervising processing activities and protection measures. The officer's contact information must be publicly disclosed and reported to the relevant authorities.

### Compliance Check:

- The privacy policy does **not explicitly mention** the appointment of a **personal information protection officer** or the disclosure of their contact information.

**Conclusion:** The privacy policy **does not fully comply** with Article 52, as it lacks explicit mention of a designated officer and their contact details.

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## Regulation 第五十三条 (Article 53)

### Requirements:

Overseas personal information processors must establish a **dedicated entity or representative within China** to handle personal information protection matters. The entity/representative's name and contact information must be reported to the relevant authorities.

### Compliance Check:

- The privacy policy does **not explicitly mention** the establishment of a dedicated entity or representative within China for overseas processing.

**Conclusion:** The privacy policy **does not fully comply** with Article 53, as it lacks explicit mention of a dedicated entity or representative for overseas processing.

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## Regulation 第五十四条 (Article 54)

### Requirements:

Personal information processors must conduct **regular compliance audits** to ensure adherence to laws and regulations.

### Compliance Check:

- The privacy policy does **not explicitly mention** regular compliance audits.

**Conclusion:** The privacy policy **does not fully comply** with Article 54, as it lacks explicit mention of regular compliance audits.

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## Regulation 第五十五条 (Article 55)

### Requirements:

Personal information processors must conduct a **personal information protection impact assessment** and maintain records in the following cases:

1. Processing sensitive personal information.
2. Using personal information for automated decision-making.
3. Entrusting or sharing personal information with other processors, or publicly disclosing personal information.
4. Transferring personal information overseas.
5. Other activities that significantly impact personal rights and interests.

### Compliance Check:

- The privacy policy mentions **sensitive personal information** (e.g., biometric data, ID numbers) and states that such data is processed with additional safeguards.
- It discusses **automated decision-making** (e.g., personalized recommendations based on user data) but does not explicitly mention an impact assessment.
- It mentions **entrusting or sharing personal information** with third parties (e.g., third-party SDKs, service providers) but does not explicitly mention an impact assessment.
- It discusses **overseas data transfers** (e.g., sharing data with overseas entities) but does not explicitly mention an impact assessment.

**Conclusion:** The privacy policy **partially complies** with Article 55, as it addresses the scenarios requiring impact assessments but does not explicitly mention conducting or recording such assessments.

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### Overall Compliance Summary:

1. **Complies with Article 51:** The policy outlines measures for internal management, categorization, encryption, access control, employee training, and emergency response.
  2. **Does not comply with Article 52:** No mention of a designated personal information protection officer.
  3. **Does not comply with Article 53:** No mention of a dedicated entity or representative for overseas processing.
  4. **Does not comply with Article 54:** No mention of regular compliance audits.
  5. **Partially complies with Article 55:** Addresses scenarios requiring impact assessments but does not explicitly mention conducting or recording them.
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## Recommendations:

- **Appoint a Personal Information Protection Officer** and disclose their contact information in the privacy policy.
- **Establish a dedicated entity or representative** within China for overseas processing and disclose their details.
- **Conduct and document regular compliance audits** and mention this in the privacy policy.
- **Explicitly state** that personal information protection impact assessments are conducted for the scenarios listed in Article 55 and maintain records of these assessments.

By addressing these gaps, the privacy policy can achieve full compliance with the listed PIPL regulations.