

Jiangsu FTZ Data-Export Negative List (2025)

DCC working English reference — measures and list scope. 中国（江苏）自由贸易试验区数据出境管理清单（负面清单）（2025版）

DCC working translation — not official; not legal advice. This English rendering is prepared by Data Compliance China for the convenience of overseas counsel. Where it diverges from the published Chinese text, **the Chinese original controls**. The list's field-level detail is summarised for scope rather than reproduced in full — consult the Chinese original (downloadable alongside this file) for the authoritative text.

REGION	Jiangsu 江苏 — Free Trade Zone
VERSION	2025 edition
ISSUED	August 13, 2025
ISSUERS	Jiangsu CAC · Provincial Commerce Dept · Provincial Data Administration
LEGAL BASIS	Cybersecurity Law · Data Security Law · Personal Information Protection Law · Network Data Security Management Regulation · Provisions on Promoting and Regulating Cross-Border Data Flows (2024)
SCALE	Biopharmaceutical sector
MODEL	Pre-export filing

Part A — Administrative Measures (Trial)

Full title: Measures for the Administration of the Data-Export Negative List of the China (Jiangsu) Pilot Free Trade Zone (Trial) — 中国（江苏）自由贸易试验区数据出境负面清单管理办法（试行）. Seven chapters, twenty-five articles. The Measures also carry an annex — the **Jiangsu FTZ Data Classification-and-Grading Reference Rule** — which is translated separately in Part B.

Chapter I — General Provisions (第一章 总则)

Article 1 (purpose and basis). These Measures are formulated to safeguard national data security, protect the rights and interests in personal information, and further promote and regulate the lawful and orderly export of data (数据出境); and to build a first-mover zone for open-economy development and a demonstration zone for the innovative development of the real economy and for industrial transformation and upgrading. They are made in accordance with the relevant requirements of the **Data Security Law of the PRC**, the **Network Data Security Management Regulation** (网络安全安全管理条例), the **Provisions on Promoting and Regulating Cross-Border Data Flows** (促进和规范数据跨境流动规定; the “CBDF Provisions”) and other laws, administrative regulations and rules, and in light of the actual circumstances of the China (Jiangsu) Pilot Free Trade Zone — which comprises the **Nanjing Area, the Suzhou Area and the Lianyungang Area** (hereinafter the “Jiangsu Pilot FTZ”).

Article 2 (scope). These Measures apply to data-export activities carried out within the Jiangsu Pilot FTZ, and to the related facilitation, safeguarding and supervision work. Where laws, administrative regulations or rules provide otherwise, those provisions apply.

Article 3 (principles). Adhering to the coordination of development and security, and following the principles of promoting regulated development and of inclusive and prudent supervision, a data-security-compliant export mechanism that **combines a negative list with operating guidelines** (负面清单和操作指引相结合) shall be established and implemented in the Jiangsu Pilot FTZ.

Article 4 (definition; handler duties). For the purposes of these Measures, a **data handler** (数据处理者) means an enterprise, public institution, organisation, group or other organisation that is registered in the Jiangsu Pilot FTZ and carries out cross-border data flow and related activities. A data handler shall identify and declare important data in accordance with the relevant provisions, carry out data-export activities in accordance with laws and regulations, and cooperate with the relevant administrative authorities in tracking, verification, supervision and inspection.

Chapter II — Working Mechanism and Responsibilities (第二章 工作机制与职责)

Article 5 (division of labour). In accordance with the requirements of the national data-export transmission security management system, the **Jiangsu Provincial Cyberspace Administration (CAC)**, the **Jiangsu Provincial Department of Commerce (Provincial Pilot Free Trade Zone Work Office)**, the **Jiangsu Provincial Data Administration**, the **Jiangsu Provincial Department of Public Security** and the **Jiangsu Provincial Department of State Security** are collectively the **provincial-level administrative authorities** (省级管理部门). They are responsible for establishing the data-export negative-list management system for the Jiangsu Pilot FTZ and for overall coordination of related matters, and — together with the provincial industry regulators and relevant functional departments — jointly guide and supervise the Zone’s data-export activities.

The **Administrative Committees of the Nanjing, Suzhou and Lianyungang Areas** (片区管委会; the “Area Administrative Committees”) are responsible for organising and guiding data handlers within their respective areas to use the negative list in carrying out data-export activities, and for continuously conducting ex ante, ongoing and ex post management.

Article 6 (Joint Conference). The provincial-level administrative authorities shall establish a **Joint Conference** system for data-export work in the Jiangsu Pilot FTZ (联席会议), principally responsible for improving the Zone’s data-export negative-list management system, coordinating and advancing the classified and graded protection of data, strengthening information sharing and work exchange, and coordinating the resolution of major problems encountered by data handlers. The Area Administrative Committees, the provincial industry regulators and the relevant functional departments shall, according to their respective duties, implement the Joint Conference’s arrangements, formulate and implement **operating guidelines** (操作指引) for using the data-export negative list in their areas and industry sectors, strengthen guidance and management, promptly report progress and problems, and continuously improve the convenience and security of data export.

Chapter III — Formulation and Management of the Negative List (第三章 负面清单制定及管理)

Article 7 (formulation workflow). Formulation of the negative list mainly comprises the following steps:

- 1. Needs research (需求调研).** Based on the Zone’s industrial development and data handlers’ actual needs, the Area Administrative Committees organise research focused on key industries and sectors, investigating and grasping the data-export situation from the angles of business scenario, category, volume and data field, as the basis for the list.
- 2. Important-data identification (重要数据识别).** Under the overall coordination of the Jiangsu provincial data-security work coordination mechanism, the provincial-level administrative authorities — in accordance with the Data Security Law and related laws, regulations and provisions — define important-data identification criteria, classify and grade data, drive the formation of an **important-data catalogue** for the Zone, and file it with the office of the national data-security work coordination mechanism per procedure. Where an industry regulator has publicly issued (or issued within the industry) data classification-and-grading standards for its sector, important data is identified under those standards on a priority basis; where no clear determination criteria exist, important data is identified under the **Jiangsu FTZ Data Classification-and-Grading Reference Rule** (see Part B).
- 3. Business-scenario analysis (业务场景分析).** Combining the research with the identification results, the Area Administrative Committees select scenarios with strong industry characteristics and frequent data export, analyse

the scale, scope and frequency of export, and set reasonable data items and volume tiers for scenarios in which export risk is controllable.

4. **Demonstration and consultation** (论证与征求意见). The Area Administrative Committees invite experts in industry, law and data security to review and validate, solicit the views of provincial industry regulators and relevant functional departments where necessary, and further refine the list.
5. **Approval and filing** (履行审批报备流程). The Area Administrative Committees study and propose additions or adjustments to the list; via the Joint Conference these are submitted to the Jiangsu provincial data-security work coordination mechanism for review. Once passed, they are submitted to the **Jiangsu Provincial Party Committee Commission for Cybersecurity and Informatization** for approval, and are then jointly filed by the Jiangsu Provincial CAC, Department of Commerce and Data Administration with the **national cyberspace authority and the national data administration**.

Article 8 (the two tiers the list must contain). The negative list shall contain at least the following two parts:

1. **Data requiring a data-export security assessment** (数据出境安全评估), mainly: (1) a **critical information infrastructure operator (CIIO)** providing personal information or important data to overseas recipients; and (2) a data handler other than a CIIO providing **important data** to overseas recipients, or providing personal information that reaches the negative-list threshold for declaring a security assessment.
2. **Data to be exported via personal information standard-contract filing or personal information protection certification**, mainly: a data handler other than a CIIO providing personal information that reaches the negative-list threshold for concluding a **personal information standard contract** (个人信息出境标准合同) or obtaining **personal information protection certification** (个人信息保护认证).

Article 9 (dynamic management). The negative list is subject to **dynamic management**. For any list already issued, the provincial-level administrative authorities track and assess implementation and security risk and, in light of the actual needs of the relevant industries and the Area Administrative Committees' recommendations, coordinate revision of the list, continuously improving the Zone's cross-border data flow policy system.

Chapter IV — Implementation of the Negative List (第四章 负面清单实施)

Article 10 (exemption effect). Where the data a handler provides overseas falls within an industry sector for which a negative list has been published, data **outside** the list may be exempted from declaring a data-export security assessment, concluding a personal information standard contract, or obtaining personal information protection certification.

Article 11 (guidelines; precedence). Where the relevant Area Administrative Committee or industry sector has issued operating guidelines, a handler may act under them. Where the guidelines are inconsistent with the negative list, **the negative list prevails**. Where laws, regulations or rules provide otherwise for data export, those provisions apply.

Article 12 (reporting; safeguards; 24-hour incident report). A handler using the negative list shall promptly report its data-export situation to its Area Administrative Committee, including but not limited to the export business scenario, the catalogue of exported data, the scale of exported data, and the overseas recipient. When transmitting important data and personal information overseas, a handler shall comply with laws and regulations, perform data-security protection obligations, and take technical and other necessary measures to safeguard export security. If a data-export security incident occurs or the risk is found to be increasing, it shall take remedial measures and promptly report to its Area Administrative Committee; **where national security or the public interest is endangered, it shall report to its Area Administrative Committee and the provincial-level administrative authorities within 24 hours**.

Article 13 (provincial guidance and monitoring). The provincial-level administrative authorities shall strictly implement national and Jiangsu data-security requirements, strengthen guidance and supervision of the Zone's data-

export activities, and establish a mechanism for risk assessment of data-export activities and for the discovery and notification of security incidents.

Article 14 (consistency spot-checks; penalties). The Area Administrative Committees and the relevant provincial industry regulators and functional departments shall have professional bodies conduct **consistency spot-checks** between the actual data export and the filing materials. Where a handler fails to strictly honour its commitments, or engages in concealment, false reporting, or intentionally causing the actually exported data to diverge from the filed data, **it may be ordered to suspend data-export activities and to rectify within a set period**; where circumstances are serious, its data-export activities are **terminated**, it is placed under key monitoring, and the situation is promptly reported to the provincial-level administrative authorities.

Article 15 (inspection; escalation to the list; referral). The provincial-level administrative authorities shall, with the relevant provincial industry regulators and functional departments and by means such as periodic inspections and “double-random” spot checks, inspect and assess implementation of the list and handlers’ export activities, and build provincial capacity to monitor and detect unlawful and non-compliant export. Where an activity presents a relatively high security risk, remedial measures are taken immediately to remove the hazard; exported data that affects or may affect national security is promptly brought into negative-list management per procedure. Leads suggesting suspected illegality or crime are promptly reported to the Jiangsu Provincial Departments of Public Security and State Security.

Article 16 (tiered, semi-annual supervision). The Area Administrative Committees and the relevant provincial industry regulators and functional departments shall track implementation of the list and the export situation in their areas and sectors, strengthen ex ante, ongoing and ex post supervision, and enhance the capacity to discover and give early warning of export security risks. They shall **report implementation of the list and the export situation to the provincial-level administrative authorities every six months**, and report significant situations promptly.

Chapter V — Data-Export Facilitation Measures (第五章 数据出境促进措施)

Article 17 (no unilateral important-data burden). A handler shall identify and declare important data per the relevant provisions. **Where data has not been notified as — or publicly published as — important data** by the provincial-level administrative authorities, the provincial industry regulators, the relevant functional departments or the Area Administrative Committees, the handler need not declare a data-export security assessment for it as important data. For classification-and-grading reference rules of sectors not covered by the list or guidelines, the relevant provisions and standards apply.

Article 18 (international treaties). Where a handler carries out data-export activities in the Zone and an international treaty or agreement China has concluded or acceded to differs from domestic law, that treaty or agreement applies, **except for provisions on which China has declared a reservation.**

Article 19 (infrastructure; green channel). Area Administrative Committees are supported in building a data-export functional platform with declaration-service and security-supervision functions. The provincial-level administrative authorities and Area Administrative Committees coordinate cross-border data-flow infrastructure, strengthen the alignment of cross-border data-flow rules, and actively advance measures such as two-way compliance and a **data-export security-assessment “green channel”**, to promote efficient and convenient data flow.

Chapter VI — Supervision and Administration (第六章 监督管理)

Article 20 (legal liability). Violations of these Measures and other relevant provisions are pursued for legal liability by the competent authorities under the relevant provisions of the **Cybersecurity Law**, the **Data Security Law**, the **Personal Information Protection Law** and other laws.

Article 21 (confidentiality of officials). Personnel involved in negative-list management shall keep confidential, per law, any state secrets, personal privacy, personal information, trade secrets, confidential business information and

other data learned in performing their duties, and shall not disclose, unlawfully provide to others, or unlawfully use it. Violators are punished under the relevant laws and regulations.

Chapter VII — Supplementary Provisions (第七章 附则)

Article 22 (national core data excluded). Data bearing on national security, the lifelines of the national economy, important aspects of people's livelihood and major public interests constitutes **national core data** (国家核心数据), which is subject to a stricter management system and is **not brought into negative-list management**.

Article 23 (export-control carve-out). Within the sectors covered by the list and guidelines, where export involves technical materials relating to controlled items under the **Export Control Law**, or technology-export management matters under the **Foreign Trade Law**, the **Export Control Law**, the **Foreign Trade Law** and other laws, regulations and rules apply.

Article 24 (residual regime; cross-reference to other FTZs). For data in sectors not covered by the list and guidelines, the **Network Data Security Management Regulation**, the **Measures for the Security Assessment of Data Export**, the **Measures on the Standard Contract for Personal Information Export**, the **CBDF Provisions** and other relevant laws, regulations and rules apply. Data-export negative lists formally issued by other pilot free trade zones may be applied by reference in the **Jiangsu Pilot FTZ**.

Article 25 (interpretation; effect; trial period). These Measures are interpreted by the **Jiangsu Provincial CAC**, **Department of Commerce and Data Administration**. They **take effect on the date of issuance, with a two-year trial period**. (The Measures are a trial first edition; the text repeals no prior version.)

Part B — Important-Data / Classification Annex

The Measures carry an annex — the **Jiangsu FTZ Data Classification-and-Grading Reference Rule** (中国 (江苏) 自由贸易试验区数据分类分级参考规则) — used to identify important data where an industry regulator has set no criteria (Art. 7(2)). It opens with a **Unified Important-Data Identification Reference Rule** and then a thirteen-category catalogue.

Unified Important-Data Identification Reference Rule (重要数据统一识别参考规则)

1. This reference rule applies to **non-classified (non-state-secret) data**; classified data is handled under the relevant provisions.
2. Personal information of **more than 10 million persons** (excluding sensitive personal information) held by a Zone enterprise; **sensitive personal information of more than 1 million persons**; or **sensitive personal information of more than 100,000 persons** that includes personal bank accounts, personal insurance accounts, personal registered accounts, personal diagnosis-and-treatment data, and the like.
3. Personal information of **more than 100,000 persons** held by an operator recognised by the State as **critical information infrastructure**.
4. **High-value sensitive data** related to industry competitiveness and industrial production safety, collected and generated by a Zone enterprise during R&D/design, manufacturing and business-management; and enterprise **supply-chain data involving national security**.
5. **Automatic-control-system parameters** and control, operation-and-maintenance, and testing data in fields bearing on the national economy and people's livelihood, held by a Zone enterprise.

Important-Data Catalogue (thirteen categories, forty sub-categories)

Representative examples only; the identification rule notes that several industrial and telecom sub-categories are identified by reference to national guides (《工业领域重要数据识别指南》YD/T 4981-2024; 《电信领域重要数据

Level-1 category (一级类别)	Sub-category (二级类别)	Representative important data
1. Strategic materials & bulk commodities 战略物资和大宗商品	1. Oil, petrochemicals & natural gas 石油、石化和天然气	Product-output and international-trade data (incl. storage and transaction data) from which the operating status, trends and growth of strategically important energy fields could be inferred.
	2. Agricultural products 农产品	Strategic-reserve data for bulk agricultural products (grain, cotton, edible vegetable oil, sugar, meat, dairy); undisclosed international-cooperation/trade data; data on rare and endangered germplasm resources (incl. genes) that may affect biosecurity; undisclosed agri/rural statistical, inspection and quarantine data; high-precision or undisclosed geographic data.
2. Natural resources & environment 自然资源和环境	3. Geographic information 地理信息	Basic geographic-information and remote-sensing imagery data meeting State-prescribed coverage/precision/scale or depicting sensitive areas and targets; thematic geographic information for natural resources and eco-environment.
	4. Meteorology 气象	Meteorological monitoring, space-atmosphere monitoring, meteorological-support, regional, radar-base data and station metadata; meteorological data serving military, national-defence research and high-tech fields.
	5. Ocean 海洋	Marine-environment and marine-resource data; militarily valuable marine-environment monitoring data not suitable for public release.
	6. Environmental protection 环保	Self-monitoring data reflecting pollutant-discharge levels, and data on penalties received or other pollutant discharges.
	7. Water conservancy 水利	Basic water-conservancy data (rivers/lakes, works, monitoring stations); flood/drought-prevention, water-resource, hydrology, water-environment, water-conservation and resettlement business data; digital-twin water-conservancy geospatial data; undisclosed national water-resource/water-regime and hydrological-observation data.
3. Industrial 工业	8. Steel & non-ferrous metals 钢铁、有色金属	Per YD/T 4981-2024. Non-ferrous-metal reserve/output/procurement data of military and civilian value; national steel and non-ferrous-metal strategic-reserve data; important geological data of strategic non-ferrous-metal deposits.
	9. Rare earths 稀土	Per YD/T 4981-2024. Mining-area data rich in important associated minerals; rare-earth mining and smelting production-technology data uniquely mastered by China.
	10. Other minerals 其他矿产	Reserve, international-cooperation and trade-negotiation data; bulk-raw-material information and data able to influence procurement pricing power; mineral-related industrial-layout data.
	11. Chemical industry 化学工业	Per YD/T 4981-2024. Detection/monitoring data of key hazardous chemicals held by Zone enterprises; key-process, equipment-operation and output/reserve data.
	12. Electric power 电力	Power-plant production, transmission-and-distribution, and construction/O&M data.

Level-1 category (一级类别)	Sub-category (二级类别)	Representative important data
	13. Electronic information 电子信息	Per YD/T 4981-2024. Advanced electronic-information tech; advanced IC design and manufacturing tech; major computing-equipment design data, algorithms and hardware/software architecture; localisation rate of important electronic components/equipment.
	14. Civil nuclear facilities 民用核设施	Test data from civil nuclear-facility R&D; facility design and manufacturing-process information; facility operation-monitoring data.
	15. Industrial equipment 工业装备	Per YD/T 4981-2024. Automobile key-component R&D and production data bearing on national tech strength and competitiveness (e.g. body-stability control, active-damping systems).
	16. Intelligent connected vehicles 智能网联汽车	Per YD/T 4981-2024. Autonomous-driving model-training data used for R&D/production; industrial-internet or industrial-control-system safe-operation-assurance data used by above-scale industrial enterprises.
	17. Other 其他	Per YD/T 4981-2024.
4. National-defence S&T industry 国防科技工业	18. National-defence S&T industry 国防科技工业	Business-management, R&D/design, manufacturing, test-verification and maintenance-support data; data reflecting the R&D and production capacity of important national-defence S&T enterprises/institutions, or that when aggregated reflects the sector's overall situation.
5. Telecommunications 电信	19. Telecommunications 电信	Per YD/T 3867-2024. Construction-planning data for important network facilities and information systems; performance-parameter, monitoring-analysis, O&M and statistical-analysis data.
6. Radio, TV & online audiovisual 广播电视和网络视听	20. Radio & television 广播电视	Undisclosed audiovisual creative content; content whose misuse could endanger ideological or public safety; transmission-coverage data of provincial-and-above broadcasters; broadcast-audiovisual monitoring data; radio-TV critical information infrastructure planning/O&M data.
	21. Online audiovisual 网络视听	Planning/construction, O&M, key-resource and security-assurance data of important networks and information systems in online audiovisual services.
7. Financial 金融	22. Banking 银行	Bank customer, business, operation-management, and system-operation/security-management data.
	23. Insurance 保险	Insurer customer, business, operation-management, and system-operation/security-management data.
	24. Securities & futures 证券期货	Investor-type, technical-type and business-type data.
	25. Financial leasing 融资租赁	Customer, enterprise-transaction and operation-management data. (Across banking/insurance/securities/leasing: institutions' security-guard information and processed business data of important enterprises, incl. national-defence/military-industry and national-security-related enterprises.)

Level-1 category (一级类别)	Sub-category (二级类别)	Representative important data
8. Transportation 交通运输	26. Transportation 交通	Production-safety control-type data in railway, road, road-transport, urban, waterway, civil-aviation and postal fields; natural-resource data obtained during construction; undisclosed route maps and key-station data; data whose leak/tampering could cause major traffic accidents.
9. Health & food-and-drug 卫生健康和食品药品	27. Genetic resources 遗传资源	Natural-person gene data and human-genetic-resource information related to race and population health; genetic-resource data reflecting a race's overall situation or bearing on biosecurity.
	28. Health & medical 健康医疗	Medical-service, EMR, e-health-record and medical-research data; diagnosis-and-treatment data of specific fields/groups/regions or reaching a certain precision/scale that bears on people's life, health and safety.
	29. Food 食品	Food-safety traceability-identifier data; parameters and control-type data of automatic-control systems in food production.
	30. Drugs 药品	Experiment data submitted in drug supply and drug approval; test data related to drug-production processes and facilities.
	31. Biosecurity 生物安全	Virus-research or bio-laboratory data.
	32. Disease-control data 疾控数据	Data on epidemics, treatment, vaccines and causes of death related to public-health emergencies and infectious diseases.
10. Public security 公共安全	33. Physical security 物理安全	Building-foundation and security-equipment data; basic data of important targets and sensitive-site security-deployment data whose unlawful use could seriously harm social stability; CII/important-network planning and secure-operation data.
	34. Cybersecurity 网络安全	Zone-enterprise information-system design/operation data; network-facility topology-architecture data; security-assurance data.
11. Internet services & e-commerce 互联网服务和电子商务	35. Internet platform services 互联网平台服务	Data usable for social mobilisation generated in providing internet services; digital-portrait data of sensitive groups (e.g. veterans); data recording/tracking military-industry and government customers.
	36. Artificial-intelligence services 人工智能服务	AI training data, algorithm source code, key-component data and control programs that may affect national security and social public interests.
12. Science & technology 科学技术	37. Intellectual property & major discoveries 知识产权和重大发现	IP data involving national defence and national security; data related to technologies listed in the Catalogue of Technologies Prohibited or Restricted from Export in China.
	38. Technologies prohibited/restricted from export 禁止出口限制出口技术	Data related to technologies listed in the Catalogue of Technologies Prohibited or Restricted from Export in China.
13. Other data 其他数据	39. Data controlled under the Export Control Law 属于出口管制法管制的相关数据	Data on items on national export-control lists, related to national security/interests and to non-proliferation and other international obligations.

Level-1 category (一级类别)	Sub-category (二级类别)	Representative important data
	40. Other national-security-affecting data 其他可能影响国家安全的数据	Other data that may affect national security in political, territorial, military, economic, cultural, social, sci-tech, cyber, ecological, resource, nuclear, overseas-interest, space, polar, deep-sea, biological and similar respects, and that meets the definition of important data.

Part C — The Negative List: Scope

The 2025 edition covers a single sector — the **biopharmaceutical industry** (医药行业). Per the list’s notes, the covered enterprises are chemical-drug API (active pharmaceutical ingredient) manufacturing, chemical-drug preparation manufacturing, biological-drug manufacturing, and medical-device manufacturing; “pharmaceutical data” means the personal information and important data arising in drug R&D, pharmacovigilance, and the daily production and operations of pharmaceutical-manufacturing enterprises.

Structure. The list splits data into **important data** and **personal information**, and organises items by the export route required:

- **Tier 1 — security-assessment list** ((一) 需要通过数据出境安全评估的数据清单): items 1 – 13 — important data (items 1 – 6) plus high-volume personal information (items 7 – 13).
- **Tier 2 — standard-contract / certification list** ((二) 需要通过个人信息出境标准合同备案、个人信息保护认证出境的数据清单): items 14 – 20 — personal information in the mid-volume bands.
- **Other lawful route** ((三) 需要通过其他合法合规路径出境的数据清单): item 21 — human genetic data, treated as important data and routed through the Human Genetic Resources regime.

PI counting rule (stated in the list). Personal-information volumes are counted **cumulatively from January 1 of the current year and de-duplicated per natural person**. Volumes falling under **CBDF Provisions Articles 3, 4, 5(1)(i) – (iii) and 6** are **excluded** from the cumulative count. For Tier-2 clinical/patient items, data assessed under the “Health Data Level Determination Rule Table” as reaching “serious harm to social order, economic operation and national security” or above is excluded (it escalates to Tier 1).

Sector	Important-data focus (Tier 1 — security assessment; representative categories)	Personal-information volume bands / scenario notes
Biopharmaceutical 医药行业 (APIs, chemical-drug preparations, biological drugs, medical devices)	<p>Security-assessment important data (items 1 – 6):</p> <ol style="list-style-type: none"> 1. Group diagnosis-and-treatment / health-status, medical-rescue-assurance, and specific-drug experiment data above a certain scale — e.g. case-record, imaging, pathology, blood-test or gene-test diagnosis-and-treatment data on ≥ 100,000 persons; EMR or health-record databases of ≥ 100,000 persons and mining/analysis results; production/supply data for major medical materials (key vaccines, strategic essential drugs); drug-experiment data bearing on national strategic security and drug production-process/facility test data. 2. Biometric and medical-resource data of specific fields/groups/regions above a certain scale. 3. Data within export-control or technology- 	<p>Personal information is banded by scenario, with a security-assessment tier (items 7 – 13) and a lower standard-contract / certification tier (items 14 – 20). Precise thresholds are set out in the table below. In outline: clinical-trial subjects trigger security assessment at ≥ 50,000; patients at ≥ 100,000; healthcare professionals/investigators/non-patient reporters at ≥ 200,000 (their sensitive PI at ≥ 100,000); the catch-all at ≥ 1,000,000 non-sensitive PI or ≥ 10,000 sensitive PI. Lower bands fall to the standard-contract / certification route.</p>

Sector	Important-data focus (Tier 1 — security assessment; representative categories)	Personal-information volume bands / scenario notes
	<p>export management matters (e.g. pharmaceutical-manufacturing items in the current Catalogue of Technologies Prohibited or Restricted from Export — codes 082701J – 082703J, 082701X – 082704X; R&D 237301J).</p> <p>4. Undisclosed drug-production and test data reflecting frontier biotech R&D (structure, dosage form, formulation/process, route of administration, efficacy/stability testing; quality-control standards, production techniques).</p> <p>5. Research data reflecting/optimising the safety, efficacy and quality-controllability of specific drugs.</p> <p>6. Undisclosed data reflecting medical-device manufacturing and equipment operation (e.g. innovative-device design/process data; remote-surgery-robot control-system and remote-port information).</p> <p>Other lawful route (item 21, important data): genetic information and gene data reaching the State-prescribed scale or precision — human gene/genome data produced using human genetic-resource materials (excluding clinical, imaging, protein and metabolic data); exempt where the “Administrative Licensing and Filing” obligations (Ch. IV) of the Implementing Rules of the Human Genetic Resources Regulation have been fulfilled.</p>	

Personal-information thresholds by scenario (cumulative from Jan 1, de-duplicated per natural person; CBDF Provisions Arts 3, 4, 5(1)(i) – (iii), 6 excluded):

PI scenario	Tier 1 — security assessment (安全评估)	Tier 2 — standard contract / certification (标准合同 / 认证)
Clinical-trial subjects — basic personal data + diagnosis-and-treatment/health-physiology info (clinical trials, drug R&D)	≥ 50,000 (item 7)	≥ 10,000 and < 50,000 (item 14)
Patients — basic personal data + diagnosis-and-treatment/health-physiology info (pharmacovigilance, product complaints, medical inquiry; excludes real name & contact details)	≥ 100,000 (item 8)	≥ 10,000 and < 100,000 (item 15)
Healthcare professionals / clinical-trial investigators / non-patient adverse-reaction reporters, product-complainants, medical-inquiry persons — general PI	≥ 200,000 (item 9)	≥ 10,000 and < 200,000 (item 16)
Same category — sensitive PI (ID documents, bank accounts, etc.)	≥ 100,000 (item 10)	≥ 10,000 and < 100,000 (item 17)
Patient physiological-health info / minors under 14 (medical-device after-sales; excludes real name & contact details)	≥ 100,000 (item 11)	< 100,000 (item 18)

PI scenario	Tier 1 — security assessment (安全评估)	Tier 2 — standard contract / certification (标准合同 / 认证)
Medical-business-contact persons — sensitive PI (ID documents, bank accounts)	≥ 100,000 (item 12)	< 100,000 (item 19)
All other scenarios (catch-all)	≥ 1,000,000 PI (excl. sensitive), or ≥ 10,000 sensitive PI (item 13)	≥ 100,000 and < 1,000,000 PI (excl. sensitive), or < 10,000 sensitive PI (item 20)

Note on export-controlled data. Where data within export-control or technology-export management matters must fulfil export-licence application obligations under the Export Control Law and related laws, **this list does not apply** — the export-control regime governs (consistent with Art. 23 of the Measures).

Source: 中国（江苏）自由贸易试验区数据出境管理清单（负面清单）（2025版） and its administrative measures, issued by Jiangsu CAC · Provincial Commerce Dept · Provincial Data Administration, August 13, 2025. Chinese originals downloadable at datacompliancechina.com/resources/negative-lists.

Prepared by Data Compliance China — *the careful translator*. Not legal advice. The Chinese original controls.