

# Zhejiang FTZ Data-Export Negative List (2024)

DCC working English reference — measures and list scope. 中国（浙江）自由贸易试验区数据出境管理清单（负面清单）（2024版）

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<b>REGION</b>	Zhejiang 浙江 — Free Trade Zone
<b>VERSION</b>	2024 edition
<b>ISSUED</b>	April 10, 2025
<b>ISSUERS</b>	Zhejiang CAC · Provincial Commerce Dept · Provincial Data Administration
<b>LEGAL BASIS</b>	Cybersecurity Law · Data Security Law · Personal Information Protection Law · Network Data Security Management Regulation · Provisions on Promoting and Regulating Cross-Border Data Flows (2024)
<b>SCALE</b>	2 sectors · 8 scenarios · 134 data items
<b>MODEL</b>	Pre-export filing

## Part A — Administrative Measures (Trial)

*Administrative Measures for the Data-Export Negative List of the China (Zhejiang) Pilot Free Trade Zone (Trial)* — 中国（浙江）自由贸易试验区数据出境负面清单管理办法（试行）. Twenty-two articles across six chapters, with the Data Classification and Grading Reference Rules appended (translated in Part B).

### Chapter I — General Provisions 第一章 总则

**Article 1 (Purpose and basis).** These Measures are formulated to safeguard data security, protect personal-information rights and interests, promote the lawful and orderly flow of data, and enhance the data-export (outbound-transfer) management capacity and convenience of the China (Zhejiang) Pilot Free Trade Zone (the “Zhejiang FTZ”). They are made in accordance with the *PRC Data Security Law*, the *PRC Personal Information Protection Law*, the *PRC Cybersecurity Law*, the State Council’s *Opinions on Further Optimizing the Foreign Investment Environment and Intensifying Efforts to Attract Foreign Investment*, and the Cyberspace Administration of China (CAC)’s *Provisions on Promoting and Regulating Cross-Border Data Flows* (CBDF Provisions), and in light of the actual conditions of the Zhejiang FTZ’s industrial sectors.

**Article 2 (Scope).** These Measures apply to activities within the Zhejiang FTZ such as the formulation, approval, and use-management of the data-export negative list.

**Article 3 (Principles).** Negative-list management shall uphold the following principles:

- 1. Hold the security bottom line.** Negative-list management shall comply with the relevant provisions of laws and regulations, establish a negative-list security-management mechanism and technical-safeguard capacity, and promote the lawful and orderly flow of data on the premise of safeguarding data security and personal-information rights and interests.

2. **Promote enterprise development.** Fully consider enterprises' actual data-export needs, scientifically and reasonably define the scope of export data to be included in the negative list, facilitate enterprise data-export activities, and promote cross-border business development.
3. **Batch and classified management.** The negative list shall be formulated in batches by industry and sector; its data items shall be managed by classification and, by degree of sensitivity, may be divided into data subject to the **data-export security assessment** and data subject to **personal-information standard-contract filing or personal-information protection certification**.

## Chapter II — Responsibilities and Division of Labour 第二章 职责及分工

**Article 4 (Provincial-level administrative authorities).** In accordance with the requirements of the national data cross-border transfer security-management system, the Zhejiang Provincial Cyberspace Administration (Provincial CAC), the Zhejiang Provincial Department of Commerce, the Zhejiang Provincial Data Administration, the Zhejiang Provincial Department of Public Security, and the Zhejiang Provincial Department of State Security are collectively the **provincial-level administrative authorities**. They are responsible for establishing the Zhejiang FTZ data-export negative-list management system and coordinating related matters; guiding and supervising cross-border data-flow activities within the Zhejiang FTZ; advancing negative-list formulation by industry, sector, and batch; performing the reporting-approval and filing procedures; and establishing a dynamic negative-list management mechanism.

**Article 5 (FTZ sub-zones).** The administrative authorities and relevant local functional departments of the **Zhoushan Area, Ningbo Area, Hangzhou Area, and Jinyi Area** of the Zhejiang FTZ are collectively the **FTZ sub-zones** (各自贸片区). They are responsible for organising the data handlers in their sub-zone to implement the negative list; assisting the provincial-level authorities in formulating the negative list and issuing supporting implementing rules; specifying the users and application process of the negative list; guiding data handlers in use applications and filing; strengthening supervision of data-export activities; and building in-process evidence-retention and ex-post supervision capacity.

**Article 6 (Data handlers).** “Data handlers” under these Measures means the enterprises, public institutions, organisations, associations, or other organisations registered within the Zhejiang FTZ. Data handlers shall identify and declare important data in accordance with the relevant provisions, conduct export in accordance with the relevant management requirements of each FTZ sub-zone, and cooperate with the provincial-level authorities, the industry regulators, and the FTZ sub-zones in tracking-verification and supervisory inspection.

## 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).** Negative-list formulation mainly comprises the following workflow:

1. **Needs research.** Focusing on the Zhejiang FTZ's industrial development and data handlers' actual needs, screen and select key industries/sectors for needs research, and survey data-export activities in terms of business scenario, category, volume, and field, as the basis for formulating the list.
2. **Important-data identification.** Under the coordination of the Zhejiang provincial data-security work coordination mechanism, the provincial industry regulators shall — in accordance with the *Data Security Law* and related laws and regulations and per the relevant important-data identification standards — organise industry data handlers to classify and grade data, form the **Zhejiang FTZ important-data catalogue**, and file it, per procedure, with the office of the national data-security work coordination mechanism. Where an industry regulator has publicly or internally released classification-and-grading standards for its industry/sector, important data shall be identified per those industry standards; where an industry regulator has not specified determination standards, important data shall be identified per the *China (Zhejiang) Pilot FTZ Data Classification and Grading Reference Rules* (see Part B).

3. **Business analysis.** Drawing on the research results, select business scenarios with strong industry characteristics and common data export, analyse the scale, scope, and frequency of export, and reasonably set data items and data-volume tiers for risk-controllable export scenarios.
4. **Demonstration and consultation.** Invite experts from industry, law, data security, and other fields to conduct review and demonstration, and solicit the opinions of industry regulators and relevant functional departments for further revision and refinement.
5. **Approval and filing procedures.** The negative list shall be approved by the **Zhejiang Provincial Commission for Cybersecurity and Informatization**, and jointly filed by the Provincial CAC and the Provincial Data Administration with the national cyberspace administration (CAC) and the national Data Administration.

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

1. **The list of data requiring a data-export security assessment, mainly including:**
  - a critical information infrastructure operator (CIIO) providing personal information or important data to overseas recipients; and
  - a data handler other than a CIIO providing important data to overseas recipients, or providing to overseas recipients personal information that reaches the negative-list thresholds for declaring a data-export security assessment.
2. **The list of data to be exported via personal-information standard-contract filing or personal-information protection certification, mainly including:**
  - a data handler other than a CIIO providing to overseas recipients personal information that reaches the negative-list thresholds for concluding a personal-information standard contract or passing personal-information protection certification.

**Article 9 (Dynamic management).** The negative list is subject to dynamic management. The provincial-level authorities shall adopt a dynamic-management model for issued lists, track and assess implementation and security risks, and coordinate revision of the list. For industries/sectors for which no list has yet been issued, they shall promptly assess data-export needs, dynamically update and expand the list, study and formulate lists for the corresponding industries/sectors, and continuously improve the Zhejiang FTZ cross-border data-flow management policy system.

## **Chapter IV — Implementation of the Negative List 第四章 负面清单实施**

**Article 10 (Implementation process).** A data handler using the negative list to export data shall follow this process:

1. **Submit application.** In accordance with the supporting implementing rules of the negative list of its FTZ sub-zone, the data handler submits an application to that sub-zone. Application materials include the place of registration, the industry, the handler's business situation, and any administrative penalties and investigations/rectifications by competent regulators in its business operations over the **past 2 years**.
2. **Submit filing.** A data handler that passes review shall submit filing materials per the supporting implementing rules. Filing materials include the data-export business scenario, the export-data catalogue, the export-data scale, the overseas recipient, the reasons the export data applies the negative list, and the data sub-categories within the list that apply.
3. **Compliant export.** A data handler that has completed filing may conduct data-export activities per the assessment opinion issued by its FTZ sub-zone, and shall cooperate with the provincial-level authorities and the FTZ sub-zones in supervision and verification.
4. **Filing change.** When a filed data handler's data-export situation changes, it shall, per the supporting implementing rules, judge whether the change is a **material change**. Material changes include a material change to

the purpose, method, or scope of export; a substantial increase in export-data volume; a material change in the overseas recipient; a change to the legal documents between the handler and the overseas recipient; and other circumstances that may affect export-data security. If it is indeed a material change, the handler shall promptly **re-apply for filing** with the relevant sub-zone. If not, the handler may use the **simplified change process** to register the change with the sub-zone.

**Article 11 (Key work of the FTZ sub-zones).** Each FTZ sub-zone shall focus on the following:

1. Each sub-zone reviews the application materials per the supporting implementing rules, notifies the data handler of the review result **in writing within 5 working days**, and assists handlers that pass review in filing for negative-list use.
2. After a handler submits filing materials, each sub-zone issues **within 5 working days** a preliminary opinion on whether the export data applies the negative list, reports it to the provincial-level authorities for confirmation, and then returns the opinion result to the handler. Where the export data is **within** the list, the sub-zone guides the handler to declare a data-export security assessment, conclude a personal-information standard contract, or pass personal-information protection certification. Where the export data is **outside** the list, the sub-zone expressly informs the handler that it may flow securely and orderly per the negative-list supporting implementing rules. Where the export data **does not apply** the list, current laws and regulations govern.
3. Each sub-zone shall provide negative-list advisory services to data handlers and, in light of the overall cross-border data-flow situation, continuously optimise and improve data-export facilitation measures in its region.

## **Chapter V — Supervision and Administration** 第五章 监督管理

**Article 12 (Provincial-level supervision).** The provincial-level authorities shall strictly implement national and industry data-security management requirements; strengthen guidance and supervision of Zhejiang FTZ data-export activities; establish mechanisms for risk assessment of data-export activities and for the discovery and notification of security incidents; coordinate the building of security-risk monitoring and early-warning capacity; and strengthen whole-chain, whole-domain supervision before, during, and after negative-list use.

**Article 13 (Consistency spot-checks and penalties).** Each FTZ sub-zone shall organise professional technical institutions to conduct **consistency spot-checks** of actual data export against filing materials. Where a data handler fails to strictly perform its relevant commitments in export activities, or engages in violations such as concealment, false reporting, or intentionally causing a discrepancy between actual export data and filed data, the sub-zone may **order suspension** of its data-export activities, require rectification within a time limit, and require it to re-perform the negative-list admission-filing procedure after rectification. In serious cases, it shall pursue the handler's relevant liability per laws and regulations, **terminate** its data-export activities, place it under **priority-supervision measures**, and promptly report the matter to the provincial-level authorities.

**Article 14 (Supervision and inspection).** The provincial-level authorities, jointly with the industry regulators, supervise and inspect the FTZ sub-zones' and data handlers' implementation of these Measures. Where data-processing activities are found to pose a relatively high security risk, remedial measures shall be taken immediately to eliminate the hazard. Export data that affects or may affect national security shall be **promptly updated into the negative list**.

**Article 15 (Legal liability).** Where a data handler violates the relevant laws and regulations, its legal liability shall be pursued in accordance with the law.

## **Chapter VI — Supplementary Provisions** 第六章 附则

**Article 16 (Export-control carve-out).** Among the industries/sectors covered by the negative list, where the data export involves technical materials related to controlled items under the *PRC Export Control Law*, or technology-export

management matters under the *PRC Foreign Trade Law*, it shall be handled per the *PRC Export Control Law*, the *PRC Foreign Trade Law*, and other applicable laws, regulations, and rules.

**Article 17 (Reference rules for uncovered sectors).** For the data classification-and-grading reference rules of industries/sectors not covered by these Measures, the relevant provisions and standards apply.

**Article 18 (National fallback and CBDF exclusions).** For industries/sectors not covered by the negative list, the applicable national provisions govern — the *Measures on Security Assessment for Data Export*, the *Measures on the Standard Contract for Personal Information Export*, the *CBDF Provisions*, and the like. Where a situation falls under **Article 3, Article 4, Article 5(1)(i) – (iii), or Article 6 of the CBDF Provisions**, those provisions apply.

**Article 19 (Reference to other FTZs).** The Zhejiang FTZ may implement, by reference, negative lists officially released by other pilot free trade zones.

**Article 20 (Interpretation).** These Measures shall be interpreted by the Zhejiang Provincial CAC together with the Provincial Department of Commerce, the Provincial Data Administration, the Provincial Department of Public Security, and the Provincial Department of State Security.

**Article 21 (Implementing rules).** The implementing rules for these Measures shall be formulated separately.

**Article 22 (Effective date).** These Measures take effect on the date of issuance.

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## Part B — Important-Data / Classification Annex

The Measures append the *China (Zhejiang) Pilot FTZ Data Classification and Grading Reference Rules* (数据分类分级参考规则). These are the fallback used to identify important data where an industry regulator has not set its own standard (Article 7(2), Article 17). They comprise (1) unified important-data identification reference rules and (2) a 13-category reference catalogue.

**Unified important-data identification reference rules** (重要数据统一识别参考规则):

1. These reference rules apply to **non-classified (non-state-secret) data**; classified data is handled under the relevant provisions.
2. Personal information of **10,000,000 or more persons** (excluding sensitive personal information) held by a Zhejiang FTZ enterprise.
3. Personal information of **100,000 or more persons** held by an operator designated by the state as **critical information infrastructure**.
4. High-value **sensitive data** related to industry competitiveness and industry production safety that a Zhejiang FTZ enterprise collects or generates during R&D/design, manufacturing, and operation-management; and enterprise **supply-chain data** bearing on national security.
5. **Automatic-control-system parameters** and control, operation-maintenance, and testing data — in fields bearing on the national economy and people’s livelihood — held by a Zhejiang FTZ enterprise.

**Reference catalogue.** Thirteen Level-1 categories subdivided into 40 sub-categories. Representative important data is summarised below for scope; consult the Chinese original for the authoritative descriptions and identification examples.

Level-1 category	Sub-category	Representative important data (summarised)
Strategic materials & bulk commodities 战略物资和大宗商品类	Petroleum, petrochemicals & natural gas 石油、石化和天然气	Storage, trading, and international-trade data; output/trade data that could reveal the operating status, development trend, or growth rate of major national strategic sectors.

	Agricultural products 农产品	Germplasm-resource, international-cooperation, international-trade, and strategic-reserve data; strategic-reserve data for bulk commodities (grain, cotton, edible oil, sugar, meat, dairy); rare/endangered germplasm (incl. genes) data affecting biosafety; undisclosed agricultural statistics, inspection/monitoring, and quarantine data; geographic-information data at or above a set precision.
Natural resources & environment 自然资源和 环境类	Geographic information 地理 信息	Basic geographic-information data (positioning, place-name/address, topographic, geographic-entity), remote-sensing imagery, and thematic geographic data reaching state coverage/precision/scale or depicting sensitive areas or targets.
	Meteorology 气象	Meteorological and spatial-atmosphere monitoring data, meteorological-support and regional data, radar base data, and station metadata; monitoring data serving military, defence-research, or high-tech uses.
	Ocean / marine 海洋	Marine-environment and marine-resource data; militarily valuable marine-environment monitoring and disaster-defence data not suitable for public release.
	Environmental protection 环 保	Self-monitoring data reflecting pollutant-emission levels; data subject to administrative penalty and other pollutant-emission data.
	Water conservancy 水利	Basic water-conservancy data (rivers/lakes, projects, monitoring stations), flood/drought-defence and water-resources/hydrology/water-environment business data, and digital-twin geospatial data; undisclosed national water-resources data and key-project physical-security status.
Industry 工业类	Steel & non-ferrous metals 钢 铁、有色金属	Reserves, output, smelting-equipment, and procurement-volume data, plus international cooperation/trade data; militarily/civilian-valuable non-ferrous reserve/output/procurement data; national strategic reserves; important geology of strategic deposits.
	Rare earths 稀土	Reserves, mining, industry-use, and export data; data on ore areas rich in associated resources; China-unique rare-earth mining/smelting production-technology data; data able to influence bulk raw-material pricing power.
	Other minerals 其他矿产	Reserve data, international-cooperation data, international-trade-negotiation data, and mineral-related industrial-layout data.
	Chemical industry 化学工业	Production/operation-site and transport information, production/sales and manufacturing-method information, and civil-explosives data; detection/monitoring, key-process, equipment-operation, and output/reserve data for key hazardous chemicals; civil-nuclear R&D and operation-monitoring data (except nuclear-accident emergency data).
	Electric power 电力	Power-plant production data, transmission & distribution data, and construction/O&M data.
	Electronic information 电子 信息	Parameters, source code, IC layouts, and test data of basic electronic products (key chips, operating systems, large software); sales/service to defence and government; advanced IC design/manufacturing technology, major computing-equipment design, algorithms and hardware/software architecture, and component localisation rates.

	Civil nuclear facilities 民用核设施	Test/testing data in civil-nuclear research, design and manufacturing-process information, and operation-monitoring data.
	Industrial equipment 工业装备	Industrial-equipment R&D, application, production, sales, O&M, and management data.
	Intelligent connected vehicles 智能网联汽车	Key auto-parts R&D/production data (e.g., body-stability control, active suspension) affecting national technological strength or competitiveness; autonomous-driving model-training data; industrial-internet / ICS safe-operation data of above-scale enterprises.
	Other (industrial) 其他	Industrial-internet network, platform, and security-assurance data; industrial-control-system parameters, control, O&M, and test data.
National-defence science & technology industry 国防科技工业类	National-defence S&T industry 国防科技工业类	Operation-management, R&D-design, manufacturing, test-verification, and maintenance-support data; data reflecting key defence-S&T enterprises' R&D/production capacity, data that when aggregated reflects the industry's overall situation, and sector-specific important data.
Telecommunications 电信类	Telecommunications 电信	Identified per the <i>Guide for Identifying Important Data in the Telecommunications Sector</i> (YD/T 3867-2024); network planning/construction and O&M data reflecting the overall development of important network facilities and information systems.
Radio, television & online audiovisual 广播电视和网络视听类	Radio & television 广播电视	Data across program collection, production/broadcast, transmission/coverage, distribution, and monitoring/supervision; undisclosed audiovisual content; content whose abuse could harm ideological or public safety; provincial-and-above coverage and monitoring/supervision data.
	Online audiovisual 网络视听	Data across online-audiovisual program collection, production/broadcast, distribution, and monitoring; industry CII and important network/information-system planning, construction, O&M, key-resource, and security data.
Finance 金融类	Banking 银行	Customer, business, operation-management, and system-operation/security-management data; institutional security information; and business data of the important enterprises processed, including defence-industry and national-security-related enterprises.
	Insurance 保险	Insurer customer, business, operation-management, and system-operation/security-management data.
	Securities & futures 证券期货	Investor data, technical data, and business data.
	Financial leasing 融资租赁	Customer data, enterprise-transaction data, and operation-management data.
Transportation 交通运输类	Transportation 交通	Railway, highway, road, urban, waterway, civil-aviation, postal, and integrated-management data; production-safety control data; natural-resource data obtained during construction; undisclosed route maps and key-station data; and data whose leakage or tampering could cause major traffic accidents.
Health, food & drug 卫生健康和食品药品类	Genetic resources 遗传资源	Natural-person gene data and human genetic-resource information related to race or group health; genetic-resource data reflecting the overall race situation or bearing on biosafety.
	Health & medical 健康医疗	Medical-service, EMR, e-health-record, and medical-research data, plus health, rescue-support, and specific-drug-trial data;

		diagnosis/treatment data for specific fields, groups, or regions, or at a set precision/scale, involving life, health, and safety.
	Food 食品	Food-safety traceability data and the parameters/control data of automatic-control systems in food production; food, drug, biosafety, and disease-control data bearing on national and life safety.
	Drugs 药品	Experimental data submitted in drug supply/approval, and test data on drug-production processes and facilities.
	Biosafety 生物安全	Virus-research and biological-laboratory data.
	Disease-control data 疾控数据	Data on epidemics, treatment, vaccines, and causes of death for public-health emergencies and infectious diseases.
Public safety 公共安全类	Physical security 物理安全	Building-basic and security-equipment data; important-target basic data, security-equipment data, and sensitive-site security-deployment data whose illegal use could seriously harm social stability.
	Cybersecurity 网络安全	Enterprise information-system design/operation data, network-topology data, and security-assurance data; CII or important-network planning and secure-operation data.
Internet services & e-commerce 互联网服务和电子商务类	Internet platform services 互联网平台服务	Data generated in providing internet services that is usable for social mobilisation; digital-profile data of sensitive populations (e.g., veterans); and data recording or tracking military and government clients.
	AI 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 the public interest.
Science & technology 科学技术类	Intellectual property & major discoveries 知识产权和重大发现	IP involving defence/national security or otherwise non-public; papers, observation data, and industrialisation results that markedly enhance or directly affect national security; and data listed in China's <i>Catalogue of Technologies Prohibited or Restricted from Export</i> .
	Prohibited/restricted-export technologies 禁止出口限制出口技术	Data related to technologies listed in China's <i>Catalogue of Technologies Prohibited or Restricted from Export</i> .
	Data on items controlled under the Export Control Law 属于出口管制法管制的相关数据	Technical materials and the like on controlled items — dual-use items, military products, nuclear items, and other goods/technologies/services subject to China's export controls for national security and non-proliferation obligations.
Other data 其他数据类	Other 其他	Other data meeting the important-data definition that may affect national security across politics, territory, military, economy, culture, society, S&T, network, ecology, resources, nuclear, overseas interests, space, polar regions, deep sea, biology, and the like.

## Part C — The Negative List: Scope

The list covers two sectors — E-commerce (B2B) and Clearing & settlement — spanning 8 business scenarios and 134 enumerated data fields. Within each sector the data is organised into the two tiers required by Article 8:

- **Tier 1 — data-export security assessment (数据出境安全评估):** important data (where the sector has any) and the highest personal-information (PI) volume bands.

- **Tier 2 — personal-information standard-contract filing or personal-information protection certification (标准合同备案 / 保护认证):** the middle PI volume bands.

Data whose volume falls **below the list’s floor** may, after **filing** with the relevant FTZ sub-zone, flow to overseas recipients in an orderly manner via the negative list — i.e., without a separate security assessment, standard contract, or certification. All bands are **cumulative from 1 January** of each year.

Because the high-threshold items attach only to specifically enumerated scenarios and fields, each sector also carries a “**residual**” item that captures all other PI in the sector at the ordinary national trigger (**1,000,000 persons** non-sensitive / **10,000 persons** sensitive for the assessment tier; **100,000 persons** non-sensitive / any sensitive under 10,000 for the standard-contract/certification tier).

**Counting rule.** PI volumes are counted as the **de-duplicated number of natural persons**. Transfers falling under **Article 3, Article 4, Article 5(1)(i) – (iii), or Article 6 of the CBDF Provisions** are **not counted** toward the cumulative total.

**Definitions (as used in the list).** In the B2B e-commerce context the list frames “personal information” around **merchants (商家)** — information, recorded electronically or otherwise, relating to identified or identifiable merchants and the like, excluding anonymised information — and defines “sensitive personal information” as PI whose leakage or unlawful use could expose a merchant to discrimination or serious harm to person or property (e.g., ID-document numbers, bank-card numbers). Where an industry regulator issues cross-border-flow **compliance guidelines**, those guidelines prevail.

Sector & scenarios	Tier 1 — data-export security assessment	Tier 2 — standard contract / certification
<p><b>E-commerce (B2B) 电子商务 (企业对企业)</b></p> <p>Cross-border e-commerce platforms &amp; merchants, cross-border payment, cross-border logistics.</p> <p><i>Scenarios (4):</i> merchant onboarding &amp; information display; overseas-buyer returns; domestic-seller e-wallet setup &amp; overseas receipt/payment; customs clearance &amp; e-waybill printing.</p> <p><i>Important data:</i> none — this sector’s list covers personal information only (Note 2).</p>	<p><i>PI (excl. sensitive):</i> ≥ 5,000,000 persons.</p> <p><i>Sensitive PI:</i> ≥ 2,000,000 persons.</p> <p><i>Residual PI (other scenarios/fields):</i> ≥ 1,000,000 persons non-sensitive, or ≥ 10,000 persons sensitive.</p>	<p><i>PI (excl. sensitive):</i> ≥ 1,000,000 and &lt; 5,000,000 persons.</p> <p><i>Sensitive PI:</i> ≥ 500,000 and &lt; 2,000,000 persons.</p> <p><i>Residual PI:</i> ≥ 100,000 and &lt; 1,000,000 persons non-sensitive, or &lt; 10,000 persons sensitive.</p> <p><i>Below the list (floor):</i> &lt; 1,000,000 PI or &lt; 500,000 sensitive PI → orderly flow via the list after filing.</p>
<p><b>Clearing &amp; settlement 清结算</b></p> <p>Clearing- and settlement-related organisations.</p> <p><i>Scenarios (4):</i> bank-card clearing; membership-benefit services; commercial-card services; global receipt/payment.</p> <p><i>Important data:</i> yes — included alongside PI (Note 2).</p>	<p><i>Important data:</i> macro-characteristic and mass-aggregation-derived characteristic data; controlled, non-secret, undisclosed data from regulatory decision-making/enforcement; CII network-security vulnerability information; and data reflecting overall or key-sector economic operation / financial activity (undisclosed statistics, key-enterprise trade secrets).</p> <p><i>PI (excl. sensitive):</i> ≥ 2,000,000 persons.</p> <p><i>Sensitive PI:</i> ≥ 1,000,000 persons.</p> <p><i>Residual PI:</i> ≥ 1,000,000 persons non-sensitive, or ≥ 10,000 persons sensitive.</p>	<p><i>PI (excl. sensitive):</i> ≥ 500,000 and &lt; 2,000,000 persons.</p> <p><i>Sensitive PI:</i> ≥ 500,000 and &lt; 1,000,000 persons.</p> <p><i>Residual PI:</i> ≥ 100,000 and &lt; 1,000,000 persons non-sensitive, or &lt; 10,000 persons sensitive.</p>

		<i>Below the list (floor):</i> < 500,000 PI or < 500,000 sensitive PI → orderly flow via the list after filing.
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Source: 中国（浙江）自由贸易试验区数据出境管理清单（负面清单）（2024版） and its administrative measures, issued by Zhejiang CAC · Provincial Commerce Dept · Provincial Data Administration, April 10, 2025. Chinese originals downloadable at [datacompliancechina.com/resources/negative-lists](http://datacompliancechina.com/resources/negative-lists).

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