Questions and Answers on Data Export Security Management Policies and Regulations (September 2026)

Dan Young Business Consultancy — www.danyoungcpa.com

Unofficial English translation prepared for reference only. The official Chinese text prevails.

Issuing authority: Cyberspace Administration of China (CAC)

Published: September 11, 2026

The Cyberspace Administration of China (CAC) continues to strengthen the dissemination and interpretation of policies and regulations on data export security management, guiding and helping data processors to carry out data export activities in an efficient and compliant manner. After studying the consultation questions recently received, the CAC hereby publishes the following representative questions and answers.

Question 1 — What circumstances must be satisfied when exporting personal information by means of personal information export certification?

Personal information export certification refers to the conformity assessment activity whereby, in accordance with Article 38, paragraph 1, item 2 of the Personal Information Protection Law of the People's Republic of China, a professional certification institution that has lawfully obtained the qualification for personal information protection certification certifies that the personal information processing activities of a personal information processor, such as the provision of personal information outside the People's Republic of China, comply with relevant laws, administrative regulations, departmental rules, standards and technical specifications. An operator that is not a critical information infrastructure operator, and that has cumulatively provided outside the country, since January 1 of the current year, personal information of 100,000 or more but fewer than 1,000,000 individuals (excluding sensitive personal information), or sensitive personal information of fewer than 10,000 individuals, and that does not involve important data, may fulfill its data export compliance obligations by means of personal information export certification.

In addition, where a personal information processor engages in personal information export activities, regardless of the scale of the personal information exported, it may apply to a professional certification institution for personal information export certification, certifying that the relevant personal information processing activities comply with GB/T 35273 Information Security Technology — Personal Information Security Specification and GB/T 46068 Data Security Technology — Security Certification Requirements for Cross-Border Processing of Personal Information, thereby enhancing its compliance capability.

It should be noted that a personal information processor may not, by means such as splitting the quantity of personal information, provide outside the country, through personal information export certification, personal information that is required by law to undergo a data export security assessment.

Question 2 — After passing personal information export certification, where a data export security assessment must be declared because the scale of personal information exported has increased, will the security assessment take the certification result into account?

Where a personal information processor has passed personal information export certification, but has cumulatively exported, since January 1 of the current year, personal information of 1,000,000 or more individuals (excluding sensitive personal information), or sensitive personal information of 10,000 or more individuals, it shall declare a data export security assessment to the national cyberspace administration authority through the provincial-level cyberspace administration authority of the place where it is located.

When a personal information processor declares a data export security assessment, it may attach information on its passage of personal information export certification, explaining the level of personal

Source: https://www.danyoungcpa.com/data-export-security-policies-regulations-qa-china/

information protection of the personal information processor and the overseas recipient and the protection of personal information rights and interests; the cyberspace administration authority will take such information into account in the security assessment process.

Question 3 — How can one apply for personal information export certification?

In accordance with the Measures for Personal Information Export Certification, before applying for certification to provide personal information outside the country, a personal information processor shall, in accordance with laws and administrative regulations, fulfill obligations such as giving notice, obtaining the individual's separate consent and conducting a personal information protection impact assessment.

At present, a personal information processor may apply to any professional institution that has completed record-filing for personal information export certification. The specific contact details for consultation are as follows:

China Cybersecurity Review, Certification and Market Regulation Big Data Center — (010) 88650936; Data and Technology Support Center of the CAC (the National Cyberspace Administration of China) — (010) 55625018; Beijing Saixi Certification Co., Ltd. — (010) 64102689.

Disclaimer: This is an unofficial English translation provided for reference and informational purposes only. It has been prepared by Dan Young Business Consultancy and is not an official translation issued by any government authority. In the event of any discrepancy, the original Chinese text shall prevail. This translation does not constitute legal advice, and no attorney-client or professional relationship is created by its use. For advice on the application of these provisions to your specific circumstances, please consult a qualified legal professional.