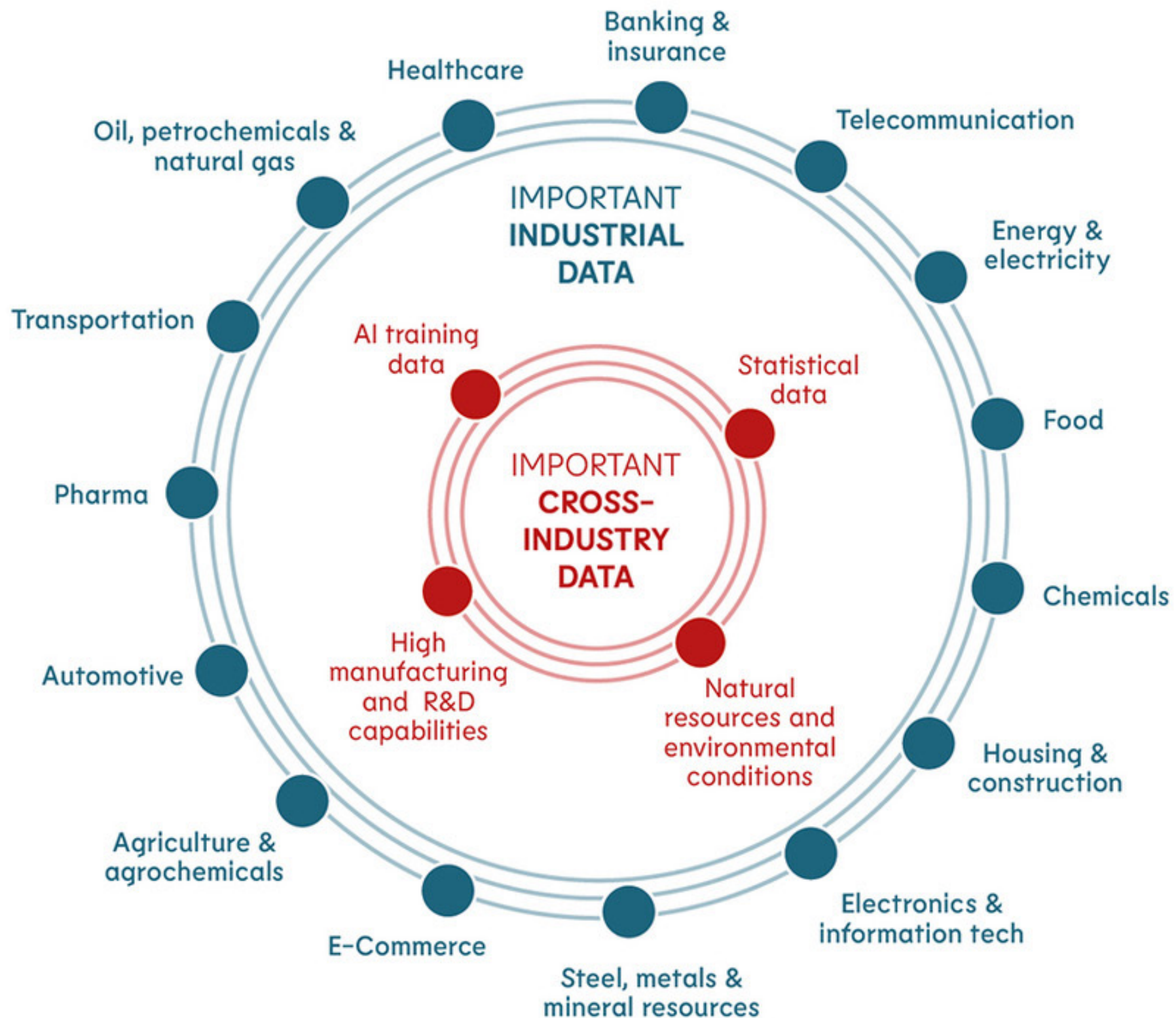


Easing data localization: FTZ negative lists signal China's future data transfer restrictions



Source: FTZ negative lists for cross-border data transfer published between 5/2024 and 4/2025 (Beijing, Hainan, Shanghai, Tianjin, Zhejiang)

Weekly Facts & Figures.

- **National rules remain strict:**
Cross-border data transfer still requires localization for “important data”
- **FTZs are testing change:** Negative lists in FTZs allow freer transfer of unlisted data types
- **Future policy signal:** FTZ pilots often shape national legislation on data governance

What This Means.

"FTZ pilots hint at future flexibility, but for multinationals, data localization isn't going away — it's just getting more selective."



Mirjam Meissner
Managing Partner



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