

## 长江信托隐私政策

生效日期：2025.04.01

感谢您选择长江信托提供的服务。本隐私政策适用于您通过任何方式使用长江信托的各项产品和服务。访问或使用我们提供的服务，即表示您同意我们隐私政策（“隐私政策”）的政策和做法，因此请仔细阅读本隐私政策。本隐私政策告知您，当您访问和/或使用我们的服务时有关我们收集、使用和披露数据的政策以及您拥有的与这些数据相关的选择。我们可随时更新本隐私政策，包括将修订版本（包括修订版本的生效日期）发布到我们的网站和相关应用程序接口或移动应用程序（“站点”）上或通过电子邮件向您发送最新的隐私政策。

本隐私政策将帮助您了解以下内容：

- 一、我们收集的个人数据内容
- 二、我们如何使用您的个人数据
- 三、我们是否分享您的个人数据
- 四、我们可能向您发送的信息
- 五、我们是否转移或存储您的个人数据
- 六、我们保留您的个人数据的时长
- 七、根据《通用数据保护条例》(GDPR)处理个人数据的法律依据
- 八、您在 GDPR 下拥有的数据保护权利
- 九、营销通信
- 十、Cookie 使用
- 十一、信息安全
- 十二、其他网站链接
- 十三、儿童政策
- 十四、您与其他客户的联系
- 十五、如何联系我们

我们致力于维持您对我们的信任，在收集及使用您的个人信息时，始终秉持并恪守以下原则：权责一致原则、目的明确原则、选择同意原则、最少必要原则、确保安全原则、主体参与原则、公开透明原则。

### 一、我们收集的个人数据内容

我们收集、处理和存储的某些个人身份信息可用于在您使用服务或给予同意时对您进行联系或识别（“个人数据”）。此个人数据可包含联系的详细信息、您提供的或从公开可访问的数据库获得的身份文件副本、您的政府识别编号以及与您的设备或互联网设备（例如，IP 地址和 MAC 编号）相关的信息。

我们在长江信托的客户登记流程（此过程可以是完整、不完整或中途放弃的流程）期间收集您提供的信息，使用设备的相机和声音权限、相册权限及文件夹读取权限都会经您同意，为保证您的行情权益和服务我们会对您提供的 IP 地址、第三方账户等进行地域或账户有效性识别。我们收集、使用、存储和转移您的个人数据，包括：

个人客户：

- 法定姓名（包括曾用名和适用的中英文名称）
- 身份文件类型（例如护照）
- 身份文件编号（例如护照号）
- 性别
- 出生日期
- 出生地
- 国籍
- 住址
- 居住国家/州
- 财产总净值（美元近似值）
- 开立账户的目的
- 财产或收入的初始和持续来源
- 业务/职业/工作的性质和详细信息
- 预期采取的活动水平
- 待在交易中使用的资金的来源
- 联系电话号码
- 电子邮箱地址
- 银行账号信息
- 我们的合规团队酌情决定的其他个人数据或文件

机构客户：

- 法定名称（包括适用的法定英文名称和法定中文名称）
- 商业名称（如果与法定名称不同）
- 成立/注册信息
- 联系人详细信息
- 关联方详细信息
- 授权代表详细信息
- 资产信息
- 我们的合规团队酌情决定的其他信息或文件

注意：

- 1.当您通过长江信托进行开户功能时，长江信托会使用设备的摄像头和麦克风权限，如您拒绝使用摄像头和麦克风权限，开户流程将无法完成。
- 2.当您使用开户等需要使用照片功能时，如果选择使用“拍照”或“拍摄”方式，长江信托会使用设备的相机权限；如果使用“从相册中选择”方式以及保存图片至相册等功能时，长江信托会使用设备的相册权限。您上传的照片、录像信息会存储至我们的服务器中，因为存储是实现这一功能所必需的。
- 3.为了确保您能正常使用行情权益和服务，长江信托会对您提供的位置等进行地域有效性识别，如您不同意，可能会影响地域或账户的有效性判断，影响您使用有关行情权益和服务。

4.长江信托通过摄像头采集用户的照片，找出照片中人脸的特征点（如眼睛、鼻子、嘴巴点）以进行人脸处理。处理结果保存到阿里云进行加密保存，对于下次修改用户个人资料进行人脸比对。长江信托不会对任何机构，第三方，共享和披露该数据。

## 二、我们如何使用您的个人数据

我们将收集的个人信息用于以下目的：

- 提供和维护服务；
- 与您沟通，管理、交付、改善服务和提供个性化服务；
- 监控服务的使用情况；
- 检测、防止和解决技术问题；
- 从我们收集的个人信息中产生通用数据，并用于改善我们的服务；
- 与您就长江信托和/或其关联方提供的其他产品或服务进行沟通，除非您选择不接收此类信息。
- 经您授权的其他用途。

## 三、我们是否分享您的个人数据

我们不会与第三方（但不包括向长江信托提供服务并签署保障客户隐私条款的合作伙伴）分享您的个人信息，但您给予同意和以下详述情况除外。

当我们合理认为有必要进行下述行为时，我们可以将您的个人信息与第三方分享：

- 保护和保卫长江信托和/或其客户的权利或财产；
- 防止或调查长江信托和/或其客户可能出现的不当行为；
- 遵守政府机构的要求，包括监管机构、执法和/或司法部门；
- 使长江信托的关联方或合作伙伴能够与您就其提供的新产品或服务进行沟通（若您未选择不接受此类通信）；及
- 为方便长江信托第三方服务提供商提供服务（例如管理或技术服务）；这些第三方服务提供商可在履行某些服务的范围内访问您的个人信息，但有义务不披露您的个人信息或不将其用于任何其他目的。

目前我们接入的第三方 SDK 服务主要包括：

- 用于生物识别信息登录验证服务；
- 程序 crash 上报；
- 提供推送功能；

我们使用了第三方（上海游昆信息技术有限公司，以下称“MobTech”）MobTech MobPush 服务将为您提供推送功能。为了顺利实现该功能，您需要授权 MobTech SDK 提供对应的服务；在您授权后，MobTech 将收集您相关的个人信息。我们已与第三方服务商进行数据安全保密约定，这些公司会严格遵守我们的数据隐私和安全要求。除非得到您的同意，我们不会与其共享您的个人信息。关于 MobTech 所收集的信息种类、用途、个人信息保护的规则及退出机制等，详见 MobTech 官网（[www.mob.com](http://www.mob.com)）上的隐私政策（[www.mob.com/about/policy](http://www.mob.com/about/policy)）条款。

接入的第三方服务均由相关方运营，受第三方自己的服务条款及信息保护声明（非本《隐私政策》）约束。关于第三方具体如何调用设备权限，以及如何收集和使用您的个人信息，建议您参考第三方的相关服务协议。

议及隐私政策。

#### 四、我们可能向您发送的信息

- 1.您在使用长江信托服务时，我们可能向您发送邮件、短信或推送通知。您可以按照我们的相关提示，在设备上选择取消订阅。
- 2.我们可能在必要时（例如：因系统维护而暂停某项服务时）向您发出与服务有关的公告。您可能无法取消这些与服务相关、性质不属于广告的公告。

#### 五、我们是否转移或存储您的个人数据

- 1.我们可能将您的信息（包括个人数据）转移并保留在位于您的州、省、国家或其他政府司法管辖区之外的计算机上，该等地区的数据保护法可能不同于您的司法管辖区内的数据保护法。请注意，我们可能将数据（包括个人数据）转移到您的司法管辖区之外进行处理。您同意本隐私政策后提供此类信息，即表示您同意进行该等转移。

我们将采取所有合理措施确保安全地处理您的数据，并遵守本政策的规定，并且除非有适当的保护措施（包括您的数据和其他个人信息的安全），否则不会将您的个人数据转移至某个组织或国家。

- 2.我们会按照相关法律法规规定，将在中华人民共和国境内收集的您的个人信息存储于中华人民共和国境内，并依法对这些信息进行严格保密。如部分情形下需要向境外机构传输境内收集的相关用户个人信息的，我们会按照法律、行政法规和相关监管部门的规定执行，并通过签订协议、现场核查等有效措施，要求境外机构为所获得的您的个人信息保密。

#### 六、我们保留您的个人数据的时长

我们保留您的数据将仅限于本隐私政策规定的目的。我们将在遵守我们的法律义务、争议解决和实施我们的法律协议和政策所需的范围内保留和使用您的个人数据。使用我们的服务，即表示您同意我们保留您的数据。

#### 七、根据《通用数据保护条例》(GDPR)处理个人数据的法律依据

如果您为欧洲经济区(EEA)的居民，我们收集和使用本隐私政策所述个人信息的法律依据取决于收集的个人信息和收集时的特定背景。我们可能因以下原因处理您的个人数据：

- 我们需要与您订立合同；
- 您给予相关许可；
- 处理数据符合我们的合法权益，且不违背您的权利；
- 遵守法律规定。

#### 八、您在 GDPR 下拥有的数据保护权利

如果您是 EEA 居民，您拥有某些数据保护权利。我们将采取合理措施允许您更正、修订、删除或限制使用您的个人数据。我们也给我们来自任何司法管辖区的用户提供相同的权利。

如果您希望了解我们保留的您的个人数据内容，并希望更新或从我们的系统中删除数据，请联系我们。我

们将竭力尽快满足您的要求，但在某些情况下我们会拒绝您的删除请求，例如遵守法律规定。

在某些情况下，您拥有以下数据保护权利：

- 有权访问、更新或删除我们拥有的您的信息。
- 纠正权。您有权纠正您的信息（如果该信息不准确或不完整）。
- 拒绝权。您有权拒绝我们处理您的个人数据。
- 限制权。您有权要求我们限制处理您的个人数据。
- 获得数据副本权。您有权要求提供我们拥有的您的信息的副本。
- 撤销同意权。您还有权随时撤销同意长江信托处理您的个人信息。

根据数据访问、纠正或删除请求，我们将验证请求方的身份，以确保请求方在法律上有权提出此请求。尽管我们旨在免费响应此类请求，但我们保留收取合适费用的权利（如果您的请求重复繁杂）

您有权向数据保护机构投诉我们收集和使用您的个人数据。有关详细信息，请联系您在欧洲经济区的当地数据保护机关。

## 九、营销通信

我们可能提供与长江信托提供的产品和服务相关的公司新闻、宣传内容和信息。我们可能与我们的关联方分享我们的个人数据，以发送营销通信。使用我们的服务，即表示您接受本隐私政策，并同意接收此类营销通信，除非您在客户登记流程中选择不接收此类营销通信。

为确保我们的服务质量，对于与服务相关的通信（例如，政策/条款更新和运营通知），您了解您将无法选择不接收此类信息。

## 十、Cookie 使用

当您访问站点时，我们可以采用行业惯例，将少量数据保存在您的浏览器上(Cookie)。此信息可以放在用于访问站点的计算机或其他设备上。此信息有助于我们识别到您是客户，收集您使用我们服务的相关信息，以更好地定制我们的服务，改善您的体验。我们还可以使用所收集的信息确保遵守我们的合规计划，并确保您的账户安全不会因检测到不正常或可疑的账户活动而受到损害。

大多数浏览器都设置为自动接受 Cookie。一些 Cookie 会在完成会话时过期，其他 Cookie 仍保留在计算机或其他装置上直到删除或过期。您可以选择拒绝使用我们的 Cookie，但这可能影响服务功能或您的使用体验。

## 十一、信息安全

我们竭力保护长江信托和您免遭我们收集和存储的数据被未经授权访问、改动、披露或破坏。我们采取各种措施以确保信息安全，包括对长江信托的所有访问均采用 SSL 加密；

所有会话需要采用双重认证；定期审查我们的个人数据收集、存储和处理做法；对我们的员工和供应商采用按需知密的原则限制访问您的个人数据，且此类人员承担严格的合约保密义务。

您的数据安全对我们至关重要，但您理解并同意任何互联网传输方式或电子存储方法均不能保证 100%安

全。尽管我们尽力使用商业可接受的手段保护您的个人数据，但我们无法保证绝对安全。

## 十二、其他网站链接

长江信托可包含不由我们运行的其他网站链接。如果您点击第三方链接，将会前往此第三方的站点。我们强烈建议您查看访问站点的隐私政策。您理解我们对第三方站点或服务的内容、隐私政策或做法无控制权，也不承担责任。

## 十三、儿童政策

长江信托不向年龄 18 岁以下的任何人（下文简称“儿童”）提供服务。我们不会明知或故意从年龄 18 岁以下的任何人收集任何个人身份信息。如果您是家长或监护人，并发现您的孩子向我们提供个人数据，请联系我们。如果您发现我们收集了儿童的个人数据，但未经父母同意，我们将采取措施从我们的服务器上删除此类信息。

## 十四、您与其他客户的联系

您明白您全权负责与其他长江信托用户的互动。我们保留监控您与其他用户之间的争议的权利，但无此义务。

## Yangtze Trust Privacy Policy

Effective Date: 2025.04.01

Thank you for choosing Yangtze Trust. This Policy applies to a variety of products and services of Yangtze

Trust adopted by you in any manner. By accessing or using the services we provide, you agree to the policies and practices of our privacy policy ("Privacy Policy"). Please read this privacy policy carefully. This privacy policy informs you about our policies for collecting, using, and disclosing data when you access and/or use our services and the choices you have in relation to these data. We may update this privacy policy at any time, including posting the revised version (including the effective date of the revised version) on our website and related application program interfaces or mobile applications ("Site") or emailing you with the latest privacy policy.

We are committed to maintaining your trust in us. When collecting and using your personal information, we always adhere to and abide by the following principles: the principle of consistent rights and responsibilities, the principle of clear purpose, the principle of choice and consent, the principle of least necessity, the principle of ensuring security, the principle of subject participation and the principle of openness and transparency.

### ***Personal data we collect***

Certain personally identifiable information that we collect, process and store may be used to contact or identify you when you use the service or give your consent ("personal data"). This personal data may include contact details, copies of identity documents provided by you or obtained from publicly accessible databases, your government identification number, and information related to your device or Internet device (for example, IP address and MAC number) information.

We collect the information you provide during registration (this process can be complete, incomplete or abandoned halfway), The camera and sound permission, photo album permission and folder reading permission of the device will be approved by you. In order to ensure your market rights and services, we will identify the geographical or account validity of the IP address and third-party account provided by you. We collect, use, store and transfer your personal data, including:

#### Individual Customers:

- Legal name (including previous names and applicable Chinese and English names)
- Type of identity document (e.g. passport)
- Identification document number (eg passport number)
- User's image
- Gender
- Date of birth
- Place of birth
- Country of Citizenship
- Address
- Country/State of Residence
- Total net worth of property (approximate in US dollars)
- Purpose of opening an account
- Initial and continuing sources of property or income
- Nature and details of the business/occupation/job
- Expected goal
- Source of funds to be used in the transaction
- Contact phone number
- Email address
- Bank account information
- Other personal data or documents as determined by our compliance team as appropriate

#### Institutional customers:

- Legal name (including applicable legal English name and legal Chinese name)
- Business name (if different from legal name)
- Establishment/Registration Information
- Contact details
- Related party details
- Details of authorized representative
- Asset information
- Other information or documents as determined by our compliance team as appropriate

Notices:

1. When you create your Yangtze Trust account, Yangtze Trust needs to access your camera and microphone for face recognition. If you do not agree, you will be unable to complete the account opening process.
2. Instant message service requires access to your photos. If you need to use "Camera", Yangtze Trust will need to access your camera; if you need to use "Choose from album" or "Save to album", Yangtze Trust will need to access your photos. Photos and videos you upload will be stored in our server because this function requires storage.
3. To ensure that you could access the real-time quotes and relevant services, Yangtze Trust will identify the geographical validity of the location you provide. If you do not agree, Yangtze Trust will fail to recognize your location and could not provide such services.
4. Yangtze Trust captures the user's image through the camera and processes the key feature points (such as eyes, nose, mouth) of the face in the image for face recognition. The processing results are encrypted and stored in Amazon Web Services, we will only collect and use these images when necessary for the next user profile update, specifically for facial recognition purposes. Yangtze Trust will not share and disclose the data to any organization or third party.

### ***How we use your personal data***

We use the collected personal data for the following purposes:

- Provide and maintain services;
- Communicate with you, manage, deliver, improve services and provide personalized services;
- Monitor service usage;
- Detect, prevent, and solve technical problems;
- Generate general data from the personal data we collect and use it to improve our services;
- Communicate with you about other products or services provided by Yangtze Trust and/or its affiliates, unless you choose not to receive such information.
- Other uses authorized by you.

### ***Do we share your personal data***

We will not share your personal data with third parties (but excluding partners who provide services and sign the terms to protect customer privacy to Yangtze Trust), unless you give your consent and the circumstances detailed below.

We can share your personal data with third parties when we reasonably think it necessary to:

- protect and defend the rights or property of Yangtze Trust and / or its customers;
  - prevent or investigate possible misconduct by Yangtze Trust and / or its customers;
  - comply with the requirements of government agencies, including regulators, law enforcement and / or the judiciary;
  - enable related parties or partners of Yangtze Trust to communicate with you about new products or services provided by them (if you do not choose not to accept such communication); and
  - provide services (such as management or technical services) for the convenience of third-party service providers;
- These third-party service providers may access your personal data within the scope of performing certain services, but are obliged not to disclose your personal data or use it for any other purpose.

At present, the third-party SDK services we access mainly include:

- Login authentication service for biometric information;
- Procedure crash reporting;
- Provide IM instant messaging;
- Provide push function;

We collaborate with a third-party (Shanghai MobTech Information Technology Co., Ltd., hereinafter referred to as "MobTech") and use MobTech MobPush service to provide you with the notification push. We have signed data security confidentiality agreements with third-party service providers which will strictly protect our data privacy and abide security requirements. We will not share your personal information with them without your consent. To make sure that you understand the types and purposes of information collected by MobTech, the rules of personal information protection, and the opt-out mechanism, etc., you can visit their website ([www.mob.com](http://www.mob.com)), under ([www.mob.com/about/policy](http://www.mob.com/about/policy)) to learn about MobTech's privacy policy.

The accessed third-party services are operated by relevant parties and are bound by the third party's own terms of

service and information protection statement (not this Privacy Policy). For details about how the third party invokes the device permissions and how to collect and use your personal information, it is recommended that you refer to the relevant service agreement and privacy policy of the third party.

### ***Information we may send you***

1. When you use Yangtze Trust service, we may send you email, SMS or push notification. You can choose to unsubscribe on the device according to our relevant tips.

2. We may issue service related announcements to you when necessary (for example, when a service is suspended due to system maintenance). You may not be able to cancel these service-related announcements that are not advertising in nature.

### ***Do we transfer or store your personal data***

1. We may transfer and keep your information (including personal data) on computers located outside of your state, province, country, or other government jurisdictions, where data protection laws may be different from your jurisdiction data protection law within. Please note that we may transfer data (including personal data) outside of your jurisdiction for processing. By providing such information after agreeing to this privacy policy, you agree to the transfer.

We will take all reasonable measures to ensure that your data is processed safely and comply with the provisions of this policy, and unless there are appropriate protective measures (including the security of your data and other personal information), your personal data will not be transferred to any organization or country.

2. In accordance with provisions of the laws and regulations, we shall store your personal information that we collect within the territory of the People's Republic of China (hereinafter referred to as "China") and shall keep such information strictly confidential. Where the personal information of relevant users collected by us within the territory of China needs to be transmitted to any overseas agency in certain situations, we shall execute it in accordance with the provisions of the laws, administrative regulations and supervision departments, and shall request such overseas agency to keep your personal information confidential, by signing agreements, on-site verification or other effective measures.

### ***How long we keep your personal data***

We will retain your data only for the purposes specified in this privacy policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations, resolve disputes, and implement our legal agreements and policies. By using our services, you agree to our retention of your data.

### ***The legal basis for processing personal data in accordance with the General Data Protection Regulation (GDPR)***

If you are a resident of the European Economic Area (EEA), the legal basis for our collection and use of personal information described in this privacy policy depends on the personal data collected and the specific background at the time of collection. We may process your personal data for the following reasons:

- We need to enter into a contract with you;
- You give relevant permission;
- Data processing conforms to our legitimate rights and interests and does not violate your rights;
- Comply with legal requirements.

### ***Your data protection rights under the GDPR***

If you are a resident of the EEA, you have certain data protection rights. We will take reasonable measures to allow you to correct, amend, delete or restrict the use of your personal data. We also provide the same rights to our users from any jurisdiction.

If you want to know the content of your personal data we keep, and want to update or delete the data from our system, please contact us. We will try our best to meet your request as soon as possible, but in some cases we will reject your deletion request, such as complying with legal requirements.

In some cases, you have the following data protection rights:

- The right to access, update or delete your information that we have.
- The right to rectification. You have the right to correct your information (if the information is inaccurate or incomplete).
- The right to refuse. You have the right to object to our processing of your personal data.
- The right to restriction. You have the right to request that we restrict the processing of your personal data.
- The right to copy data. You have the right to request a copy of your information that we have.
- The right to withdraw consent. You also have the right to withdraw your consent to Yangtze Trust's processing of your personal information at any time.

According to the data access, correction or deletion request, we will verify the identity of the requesting party to ensure that the requesting party is legally entitled to make this request. Although we aim to respond to such requests free of charge, we reserve the right to charge appropriate fees (if your request is repeated and complicated)

You have the right to complain to the data protection agency about our collection and use of your personal data. For more information, please contact your local data protection authority in the European Economic Area.

### ***Marketing Communications***

We may provide company news, promotional content and information related to the products and services provided by Yangtze Trust. We may share our personal data with our affiliates to send marketing communications. By using our services, you signify that you accept this privacy policy and agree to receive such marketing communications, unless you choose not to receive such marketing communications during the customer registration process.

To ensure the quality of our services, for service-related communications (for example, policy/term updates and operational notices), you understand that you will not be able to opt out of receiving such information.

### ***Cookie Use***

When you visit the site, we can use industry practices to save a small amount of data on your browser (Cookie). This information can be placed on the computer or other device used to access the site. This information helps us recognize that you are a customer and collect information about your use of our services to better customize our services and improve your experience. We can also use the information collected to ensure compliance with our compliance program and to ensure that the security of your account will not be compromised by the detection of abnormal or suspicious account activity.

Most browsers are set to automatically accept cookies. Some cookies expire when the session is completed, and other cookies remain on the computer or other device until deleted or expired. You can choose to refuse to use our cookies, but this may affect the function of the service or your experience.

### ***Information Security***

We strive to protect Yangtze Trust and you from unauthorized access, alteration, disclosure or destruction of the data we collect and store. We take various measures to ensure information security, including all access to Yangtze Trust adopts SSL encryption;

All sessions require two-factor authentication; regularly review our personal data collection, storage and processing practices; use the principle of on-demand knowledge for our employees and suppliers to restrict access to your personal data, and such personnel are responsible for strict contract confidentiality obligation.

The security of your data is very important to us, but you understand and agree that no Internet transmission method or electronic storage method can guarantee 100% security. Although we try our best to use commercially acceptable means to protect your personal data, we cannot guarantee absolute security.

### ***Links to other websites***

Yangtze Trust may contain links to other websites that are not operated by us. If you click on a third-party link, you will be taken to the third-party site. We strongly recommend that you review the privacy policy of the visited site. You understand that we have no control over and assume no responsibility for the content, privacy policies or practices of third-party sites or services.

### ***Child Policy***

Yangtze Trust does not provide services to anyone under the age of 18 (hereinafter referred to as "children"). We will not knowingly or knowingly collect any personally identifiable information from anyone under the age of 18. If you are a parent or guardian and find out that your child has provided us with personal data, please contact us. If you discover that we have collected personal data of children without parental consent, we will take steps to delete such information from our servers.

### ***Your contact with other customers***

You understand that you are solely responsible for the interaction with other Yangtze Trust users. We reserve the right to monitor disputes between you and other users, but we are not obliged to do so.