

Palmup Securities Privacy Policy

Effective Date: 2025.01.01

Thank you for choosing Palmup Securities. This Policy applies to a variety of products and services of Palmup Securities 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 Palmup Securities account, Palmup Securities 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", Palmup Securities will need to access your camera; if you need to use "Choose from album" or "Save to album", Palmup Securities 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, Palmup Securities will identify the geographical validity of the location you provide. If you do not agree, Palmup Securities will fail to recognize your location and could not provide such services.
4. Palmup Securities 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. Palmup Securities 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 Palmup Securities 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 Palmup Securities), 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 Palmup Securities and / or its customers;
 - prevent or investigate possible misconduct by Palmup Securities 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 Palmup Securities 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), under (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 Palmup Securities 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 Palmup Securities'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 Palmup Securities. 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 Palmup Securities 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 Palmup Securities 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

Palmup Securities 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

Palmup Securities 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 Palmup Securities users. We reserve the right to monitor disputes between you and other users, but we are not obliged to do so.