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## XUNHUI Privacy Policy

Your use of the XUNHUI Services and our collection, use, retention, disclosure and protection of the personal information you provide to us will be subject to the following Privacy Policy, which you are requested to familiarize yourself with and understand. We may update it from time to time and you agree that we may not otherwise notify you. Your continued use of the XUNHUI Services will be governed by the updated Privacy Policy. Therefore, we recommend that you check our website frequently.

### 1. Type of Information We Collect

- 1.1 Information which you provide by filling in both our website forms and any type of written forms, which includes information provided by you while you register and request to use our website, subscribe to and use our service, as well as any further information we may request when we process your service application, when we deliver services to you, and when you report a problem back to us.
- 1.2 Details of transactions executed through our website or other methods and services that we process for you, which may include order amounts, details of buys of whom are making purchases, and other transaction-related information. We will retain such information when you are using our service and may add it to your account profile for use in relation to your future use of our service.
- 1.3 The IP address of your computer and other information about the device you use to access our service, from which information you may be identifiable. We retain this information to detect unauthorized access.
- 1.4 Details of your visits to our website, including but not limited to, traffic data, location data, weblogs and other communication data. We collect these data for the purpose of providing you with our services or otherwise and providing the resources that you visit.
- 1.5 Information about yourself. This may include your name, address, phone number, email address, our potential and existing Customer's business name, registration number, business address, copies of ID of directors, directors' names, directors' dates of birth, employment details and information relating to your financial circumstances. In order to enable us to provide our services to you, you must provide your designated bank account information, "Know Your Customer" information, password information, and responses to security questions. In addition to the "Know Your Customer" information you provide when you apply for a XUNHUI account, we may ask you for further identification information in the course of

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providing services to you, in particular, when you make or receive high value orders, or to comply with our anti-money laundering regulations.

- 1.6 When you contact us, we may keep a record of that correspondence. We may also require you to complete surveys which we use for research purposes, although you do not have to respond to them.

## **2. How Do We Collect Information**

- 2.1 We collect information about you when you access our website, register an account (online or through paper based forms) or when you communicate with us over the phone or in writing.
- 2.2 When you access our websites, we may collect your information such as IP address and cookies, please refer to Provision 8 regarding IP address and cookies.
- 2.3 When you register an account with us, we collect, process and store information including but not limited to the information mentioned in Provision 1.5. Once your XUNHUI Account is fully set up, we will collect, process and store transactional information including but not limited to the information mentioned in Provision 1.2.

## **3. Purpose to Collect Information**

- 3.1 One of the main reasons we collect and use your personal and business information is to allow us to process your account and service application, to maintain the accuracy of information on your account. Once you have a XUNHUI Account with us, we will use your details to contact you and to reply to any queries or requests. We may use your information in the administration of your account, which includes updating your account details (this assists us to keep our records as up to date as possible) or in order to notify you of any change or improvement to our products or services which may affect your use.
- 3.2 We use your information in order to supply our products and services to you and to meet our contractual obligations to you. Additionally, we may need to notify you of any changes relating to our products and services.
- 3.3 Anti-money laundering is one of XUNHUI's top focuses, which requires us to undertake due diligence on our Customers. This may include use of electronic verification tools. Where electronic verification is not possible, we will require Customer to provide documents including but not limited to, copies of identification documents and proof of address. We may also need to pass your information onto governmental departments, regulatory authorities, the police/law enforcement agencies or to a court of law. This would be done,

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for example, to assist in the prevention of a crime (money laundering/fraud), to meet legal requirements or for other lawful purposes.

3.4 We may use your information to keep you updated of information concerning our products and services. Customer surveys help us to improve our services. We may send you emails inviting you to participate in surveys or requesting for feedback on our services. The information may be shared with affiliated third parties in aggregate form only. We may also use the information you provide to us when you interact on our website or sign up for our services. We may share this information with any members within our group, and third parties. Please contact us if you do not wish to receive such advertisements.

3.5 We may record all our telephone calls for security and training purposes.

#### 4. Sharing of Information

4.1 We may disclose your personal information to any member within our group.

4.2 Under the following certain events, we may disclose your personal information to third parties: a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; b) If XUNHUI or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

4.3 We may share your information with regulators, banks, other third party payment processors and any third party based on your authorization:

4.3.1 We may need to share your information with regulators or other law enforcement agencies. We may need to disclose or share your personal data in order to comply with our legal obligations, or to enforce or apply the Agreement or other agreements, and to protect the rights, property, or safety of XUNHUI, our Customers, or others. This includes exchanging information with other companies or organizations for the purposes of fraud detection and credit risk reduction.

4.3.2 We may need to share your information with third parties in order to process your transactions, including but not limited to, bank counterparties and third party payment processors.

4.3.3 Owing to the nature of our business, we may need to share your information with individuals or organizations outside your country of residency, such as intermediary or beneficiary banks. We are required to add certain information to the payment, which may include your name and address.

4.3.4 Additionally, we may provide your information to a third party based on your authorization and instruction.

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4.4 We may also use your information, or allow third parties selected by us to use your information, to provide you with information about products and services which may be of interest to you, and we or they may contact you by post or telephone. Contact us if you do not wish us to use your information this way, or to pass your details on to third parties for marketing purposes.

## **5. Storage of Information**

5.1 We apply physical, electronic and procedural controls to protect your information. We store all information in electronic forms. Depending on the type of service you use, your information is stored on servers located in mainland China or Hong Kong, and is protected by actively maintained firewalls. We employ the most up-to-date anti-virus software and set restricted physical access to the servers. If you provide paper-based documentation, we may retain these paper documents in addition to their e-copies.

5.2 Transmission of data on the internet can never be guaranteed as completely secure. We do not and cannot guarantee security of information collected or transmitted electronically. However, we would make reasonable endeavors to protect your personal information.

5.3 All necessary information, including but not limited to, regulatory related information (e.g. information related to anti-money laundering and counter-terrorist financing), will be stored no less than 5 years according to regulatory legislation.

## **6. Access of Your Information**

6.1 You may request in writing for details of personal information we hold about you, a description of that information, the purposes for which it is being used and all shared parties. However, we have sole discretion to reject such request with no liability nor obligation.

6.2 If we provide such information, we may charge you a certain amount of administration fee.

## **7. Change to Privacy Policy**

7.1 Any changes we may make to our privacy policy in the future will be posted on our website, and where appropriate, notified to you by e-mail.

## **8. IP Address and Cookies**

8.1 We may collect information about your computer, including available IP address, operating system and browser type, for purposes of system administration and reporting aggregate information to our advertisers. Such information is statistical data about the browsing

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actions and patterns of our Customers and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file stored on the hard drive of your computer, or similar technologies for information storage or retrieval, such as local shared objects, web beacons or web bugs.

- 8.2 A cookie is a small file of letters and numbers downloaded onto a device when a user accesses certain websites. A cookie will allow a website to identify a user's device. A cookie will contain the name of internet location of the source of that cookie and its lifetime.
- 8.3 We use session cookies to allow you to carry information across pages of our website to avoid re-entry of information. Such cookies are temporary cookies which would be stored in the cookie file of your browser only during your stay on that website.
- 8.4 We also use persistent cookies from time to time to help us recognize you as a unique user when you return to our website, and to monitor your use of our website; should you come to our website through a paid advertisement or a banner on a website of an Affiliate, it also enables us to link you to all of our group members and Service Providers. Persistent cookies may remain in the cookie file of your browser for a much longer period, depending on the lifetime of that specific cookie in question.
- 8.5 Some of our web pages may contain web beacons which allow us to count users who have visited these pages. Web beacons only collect limited information, including a cookie number, time and date of a page view, and a description of the page where the web beacon resides. These beacons do not carry any personally identifiable information and are used to track the effectiveness of a particular marketing campaign.

## **9. Enquiry and Contact**

- 9.1 Should you have any other enquiries regarding this Privacy Policy, please kindly contact us.