

Snowball Securities Privacy Policy

Updated on: 30/Oct/2018

Effective from: 30/Oct/2018

Snowball Securities is committed to protecting the privacy of personal information. The Privacy Policy demonstrates how we deal with the personal information of our users in regards of the **collection, processing, storage, use, sharing, transfer, public disclosure and protection** of the personal information.

We understand the importance of the personal information that you share with Snowball Securities, so that we are dedicated to ensuring the personal information is secured. We pursue our commitment based on the following principles: the principle of consistent power and responsibility, the principle of clear purpose, the principle of selective consent, the principle of least adequate, the principle of ensuring safety, the principle of principal participation, the principle of openness and transparency. In the meantime, we promise that appropriate practice is adopted to protect your personal information in accordance with the mature security standards in the industry.

Please read this privacy policy carefully before using our services. If you have any questions about this privacy policy, you can contact us through our published contact information. If you do not agree with any content of this privacy policy, you should terminate using our service immediately. By using any of the services we provide, you agree that we collect, process, store, use, share, transfer, publicly disclose and protect your personal information in accordance with this privacy policy.

This privacy policy applies to all the services Snowball Securities provides, including your visit to our website, www.snowballsecurities.com, utilising Snowball Securities trading software (Snowball Securities App), utilising Snowball Securities security software (Snowball Securities Token App), and the services provided to you via our accounts on Wechat, other social medias, Wechat applets and other applets on other Internet media that may be involved from time to time.

This privacy policy does not apply to information collected by other third party products or services (" third parties ", including but not limited to counterparty of your transaction, any third party websites and third party service providers) accessed through our services. We are not responsible for the third party's use of your personal information and the consequences. Please note that a third party may have its own privacy policy and you need to read it carefully. You may find Cookies or Web Beacons when you view a web page created by a third party or use an application

developed by a third party. These Cookies or Web Beacons are not under our control and their use is not subject to this privacy policy.

1. Collection of personal information

When you use our services, your information is collected either it is proactively provided or generated during your use and it is for the purpose of optimizing our service and security of your account. Without such personal information, we cannot provide services to you. The personal information that will be collected is set out as follows.

- a. information provided during the application for account opening, such as identity information (name, gender, marital status, date of birth, ID number/passport number, nationality, address, contact information, email address, tax jurisdiction, etc.) and relevant supporting documents; Employment information (such as industry category of employment, position, salary, employer, address of employer, etc.) and relevant supporting documents; Financial status (such as source of income, net annual income, net worth, liquid net worth, total assets) and relevant supporting materials; Investment experience (such as years of investment experience, investment products, trading history, investment preference, etc.);
- b. information may be automatically collected and stored as service log when you use our services. It includes equipment information such as your device model, operating system, unique device identifier, battery mode, signal weakness etc., software information such as software version, browser type, information related to mobile applications and other software in your use may be collected to ensure secure operating environment, IP address, service log information such as the information you opt to view when using our service, service failure information, referral website, etc., and communication log information, such as the account you used to communicate with when using our service;
- c. information we obtain through your use of our trading software, such as your trading information (stocks trading, account information, account profit and loss analysis), and etc;
- d. we may collect your information for reasonable needs such as improving the service quality, including the relevant information you provide through your contact with our customer service, the information in the response when you participate in the questionnaire survey, and the relevant information you provided during your previous use of our services;
- e. when you use our services, you have authorised our affiliated companies or cooperative companies to receive, summarise and analyse your personal information or transaction information for business and cooperation needs. If you refuse to provide the above information or deny authorization, you may not be

able to use the corresponding products or services of us, our affiliates or our partners, and you may not be able to be displayed some relevant information.

- f. if you live in EU, you have the right to restrict the processing of your personal Data under the General Data Protection Regulation (" GDPR "). We will evaluate your request for restricted use of personal data, and if it is required by GDPR, we will process your data according to the specific circumstances applicable in the regulations and notify you before removing restrictions.

2. How do we collect the personal information?

We will collect your personal information under circumstances as follows:

- a. processing new account for you according to your application, and providing account management services to you according to your authorization;
- b. undergoing customer due diligence procedures on clients;
- c. during your use of our services;
- d. during your trading process on our trading software;
- e. monitoring your account transactions, conducting risk analysis and managing your account;
- f. undergoing anti-money laundering and countering financing of terrorism procedures;
- g. fulfilling our obligations to report, disclose, or investigation for compliance purpose;
- h. other circumstances as required by laws and regulations.

In order to protect you against the risks arising from your use of our services or to determine the liability for breach of contract, we may check and verify your relevant information (such as any criminal record, and against list of Politically Exposed Person, etc.) through third-party agencies.

We may store your personal information in our data centres located in other countries or regions depending on business needs. We will keep the term of the storage to the minimum that we need to achieve our goals. However, way may change the storage term as required by law, including applicable laws and regulations, orders and/or proceedings of court, requirements of relevant government authorities. Different jurisdictions may not have data protection laws similar to those of your jurisdiction. However, our commitment to comply with this privacy policy and to protect your personal information holds still.

3. How do we use your personal information?

We will use your personal information for the following purposes:

- a. provide services to you and improve our products, including customer service support and services provided on our software or websites;
- b. send you notifications of service status, marketing activities and other messages for commercial purpose;
- c. promotional activities;
- d. conduct statistical analysis on the products or services in order to improve the quality of our products or services;
- e. store information relevant to you for our business operation and to meet applicable laws and regulations of various countries;
- f. prevent or prohibit illegal activities;
- g. protect the personal safety, property safety, lawful rights and interests of other customers, us or our affiliates and our employees.

If you do not wish us to use your personal information for the purposes listed above, you may request us to end through the tips provided in the features or the guidelines provided in specific products and/or services.

After the termination of your service relationship with us, we will retain some of your personal information, and the retention period shall be subject to laws and regulations. If it is necessary to retain your personal information for the purposes of litigation, investigation and judicial proceedings, the retention time will be extended. For EU users, we will not conduct additional automated data analysis such as user portraits of your data under the GDPR terms.

4. Who do we share your personal information with?

We will not disclose your personal information to any third party with exceptional circumstances set out below. You will be notified before any public disclosure of your personal information including the purpose of the public disclosure, the type of information to be disclosed, any sensitive information that may be involved, and your permission is required.

- a. we will process your personal information within the company, overseas affiliates and cooperative companies allowed by applicable law.
- b. we may disclose your personal information to our third-party suppliers (courier services, legal services, accounting services, financial risk management, debt recovery, etc.).
- c. if you apply for a new account with us, we may share your personal information with designated settlement and clearing partner;

- d. we may share your personal information with agencies providing services in the field of financial risk prevention and regulatory authorities for the purposes of determining if your account or transaction is secure and compliant.
- e. consistent with applicable law, we may share your personal information with police, court, regulators or attorneys or other parties when it is required by law.
- f. if we carry out joint promotion activities with third parties, we may share with them the personal information generated in the process of the activities and necessary for the completion of the activities, such as the number of participants, winner list, contact information of winners, etc., so that the third party can timely issue gifts to you (if any);
- g. as our business continues to grow, it is possible for us to conduct mergers, acquisitions, asset transfers or similar transactions, and your personal information may be transferred as part of such transactions. You will be given notifications of such transfer of your personal information.

5. Prompts about information sharing

- 5.1. Our products and services allow you to share information with your own social network and also with other users of our products and/or services, for example, the information you upload or post on our products, including your personal information you have opted to be public to others, your response to posts made by other users, and your location data and log information. Other users of our products and/or services may share information about you (including location data and log information). As long as you do not delete the shared information, the information will remain in the public domain. Even if you delete the Shared information, the information may be cached, copied or stored independently by other users or non-associated third parties that are not under our control, or stored in the public domain by other users or such third parties. Therefore, please consider carefully before you upload, publish and exchange relevant information through our products and/or services. In some cases, you can request your information to be removed or modified from our products and/or services by contacting us;
- 5.2. Some personal information may be considered as sensitive, such as your income source, financial status, personal health condition, medical information, race and religion, etc. sensitive personal information is more protected than other personal information;
- 5.3. Please note that the content and information you provide, upload or publish when using our products and/or services (such as photo, etc.) may reveal your sensitive personal information. You need to consider carefully whether to disclose sensitive personal information when using our products and/or services;

5.4. You agree that your sensitive personal information will be handled and processed by us according to the purpose and manner stated in this privacy policy;

6. Emails and messages

6.1. emails and messages: when you use our products and/or services, we may send you email, containing news or push notifications. If you do not wish to receive these messages, you can follow our tips to unsubscribe;

6.2. announcements about our products and/or services: we may notify you of announcements about the products and/or services when necessary (such as when a service is suspended due to system maintenance). You may not be able to cancel these announcements that are related to products and/or services and are not advertising in nature.

7. Manage your personal information

7.1. Access to your personal information

Unless otherwise stipulated by laws and regulations, you have the right to access your personal information. You can access and update your personal information in "Personal Homepage" and "Account and Security Settings" by logging into your account. You may also view your transaction records either on our website or on the client application. If your access fails, you may contact the customer service and we will respond to your request. If you are an EU user, you have the right to require us to withdraw your personal data and transfer it to other data controllers under the GDPR regulations.

7.2. Edit your personal information

You may modify or add to your personal information by means shown on the webpage of your personal account.

7.3. Delete your personal information

You may request us to delete your personal information in the circumstances set out below:

- a. the collection and use of your personal information are undertaken without your consent;
- b. our processing of your personal information seriously violates the terms of the agreement with you;
- c. our processing of your personal information violates the law;
- d. if you are an EU user, you have the right to request us to delete your personal data under the terms of GDPR.

7.4. Security of your personal information

Sophisticated password and keeping the account information confidential play equally important parts in safeguarding your personal information. There may be adverse effects and legal consequences if you disclose your account and password information to others. If you observe that your account and/or password have been or will be disclosed to others for any reason, please contact our customer service immediately so that we can take appropriate action. However, until we become aware of this situation and take action within a reasonable time, we do not take any responsibility for the consequence of the disclosure of your account information.

When you log into your account, especially on a public device, you should log out immediately after the use.

We do not take responsibility for any loss as a result of the access to your personal information by third parties due to your failure to protect the privacy of your personal information. You need to notify us immediately once you become aware of any unauthorised use of your account or other security vulnerabilities. Your assistance will help us better protect your personal information.

8. Individual rights under GDPR

If your personal information is set up in the European economic area (EEA), you have a series of legal rights relating to the personal information you share with us under the General Data Protection Regulation, including:

- a. you have the right to be informed about your personal information processing and access your personal information shared with us. Please note that in some cases, we have the right to deny your access to a copy of your personal information, subject to applicable laws.
- b. you can request us to modify your personal information if it is inaccurate or incomplete, and you need to provide documentation to verify the information;
- c. you may request us to delete your personal information in some case. Please note that for public interest, public health, or scientific and historical research purposes, we are entitled to retain your personal information even if you request us to delete;
- d. in some cases, you have the right to object to our processing of your personal information and request us for restricted use of your personal information. Similarly, in some cases, we have the right to deny your request to terminate or limit the processing of your personal information.
- e. according to the terms of GDPR, in addition to providing systematic protection for personal data, we also set up a data protection officer (DPO) to take full charge of your data protection.

We evaluate all the requests and complaints we receive and respond to them in a timely manner. We may require you to provide a valid copy of ID as part of fulfilling our security obligations and preventing unauthorized data disclosure. We are entitled to charge reasonable administrative fees for requests for access to personal data if the request is clearly unreasonable or abnormal, or if the request is to provide additional copies of your personal information. Under the circumstance that you withdraw the permission about your personal information permission, we may continue to use or process your personal information without your permission if it is for legitimate reasons.

For personal information regulated by GDPR, we may transfer your personal information outside the EEA for specific licensed purposes. We ensure that any such international transfers abide by GDPR or other relevant laws.

9. Safeguarding personal information

9.1. We only retain your personal information for the purposes stated in this privacy policy and for the time limit permitted by laws and regulations.

9.2. We guarantee your personal information security and endeavour to prevent information loss, tampering, disclosure and misuse. We utilise a variety of security techniques to safeguard your personal information at a reasonable level.

9.3. We will make sure that your information is secure by taking security protection measures of a reasonable level. A security program is set up to protect your information from unauthorized access. Physical, technical and administrative security measures are put in place to reduce the risks of loss, misuse, unauthorised access, disclosure, and unauthorised change, and these measures include but are not limited to the transport layer data encryption, firewall and encryption storage, physical access control, and information access authorization control. For example, the telecommunication you have with us are insured by encryption protection (SSL). All your personal information is encrypted and stored on our server with encryption of high level. Please be aware that your information may be leaked, damaged or lost even if we have utilised all the above mentioned technical tools due to various unforeseeable and malicious means.

9.4. We have procedures, process and responsible staff in place to guarantee the security of your information. For example, we strictly limit the scope of personnel within the team who have access to client's personal information, all our employees are managed to sign confidentiality agreements, and these agreements are regularly audited by independent security organisations. We organise training courses on security and privacy protection to enhance employees' awareness of the importance of protecting personal information on a regular basis.

9.5. For EU users, a data protection officer (DPO) is assigned to take full charge of your data protection, in addition to our systematic personal data protection.

9.6. In case of any security incident about personal information, we will inform you of the details of the incident, the possible effects to you, the remedial measures we will take, our suggestions for your actions towards self-prevention and risk reduction and other remedial measures we take to protect you from bearing further loss as required by laws and regulations. We will inform you of the relevant information of the incident by E-mail, letter, phone or push notification. We will also make announcements in a reasonable and effective way in case of the information difficult to be passed on one by one to the subject involved in the incident. Meanwhile, we will report the resolution of information security incident to the supervisory department as required.

10. How do we use Cookies

10.1. Cookies are small text files created by the website server and saved in any user's browser. When the user visits the website server, the website can access Cookies information. In addition to being commonly used to confirm user identity, Cookies can be used to store user information and track user access behaviour.

10.2. We will not collect and track any information and behaviours of the user except to confirm the identity and login status of the user by using cookies.

10.3. You can manage and delete Cookies according to your own preferences. Most browsers have the function that allows you to disable or delete Cookies in the system. It's important to note that blocking Cookies could result in some functionality on our website or system not working effectively to some extent, which could impact on your experience.

11. Protection of personal information for minors

We attach great importance to the protection of minors' personal information. Our website and services are mainly for adults. If you are a minor, we suggest that you ask your parents or guardians to carefully read this privacy policy and use our services or provide us with information with the consent of your parents or guardians.

We will only use, share, transfer, or disclose the personal information of a minor under circumstances that are permitted by law, with explicit consent of the parent or the guardian, and using our product or service is necessary to protect a minor.

we will take all possible actions to delete personal information of a minor if we find ourselves collecting the minor's personal information without the prior consent of a verifiable parent or legal guardian.

12. Update of this privacy policy

We may update this privacy policy to reflect changes in the way we handle your personal information or changes in legal requirements. Any changes to our privacy policy will be published on our website and/or client application, and the revised privacy policy takes effect from the time of publishing. We recommend that you check our website/client application page regularly for the latest information on our privacy policy.

Your action to continue to use the services provided by our website/client application will be deemed to have accepted and accepted our updated privacy policy.

13. How can you contact us

We welcome any comments or suggestions about our privacy policy. If you have any questions about this privacy policy, you can contact us by the following means and we will reply to you as soon as possible:

- a. contact us on the customer service number published in our website/client application;
- b. login to our website/client application and the online customer service.