

**Privacy Policy for
Official Website of Shanghai Foreign Service (Group) Co., Ltd.**

Attention:

Welcome to the official website of FSG and use the services provided!

Your trust is of great importance to us, and we are well aware of the importance of personal information to you. We will provide full protection for your personal information pursuant to laws and regulations and referring to the best practices in the industry. For this purpose, Shanghai Foreign Service (Group) Co., Ltd. (hereinafter referred to as “**we/us/our**” or “**FSG**”) has formulated this Privacy Policy for the Official Website of Shanghai Foreign Service (Group) Co., Ltd. (hereinafter referred to as this “**Policy**” or this “**Privacy Policy**”) to help you fully understand how we collect, use, share, store and protect your personal information and how you can manage your personal information when browsing the official website of FSG and using the services provided. Before using our services, please read and understand this Policy carefully, especially the terms **marked in bold or with bold underline**, to ensure that you fully understand and agree with this Policy before using our services. We will try our best to explain the professional terms involved in this Policy in simple and easy-to-understand language for your understanding. **If you have any questions, comments or suggestions about this Policy, you can contact us through the contact information provided herein.**

We will, in strict accordance with laws and regulations, properly collect, process or use your personal information based on such principles as lawfulness, reasonableness, justification, honesty and necessity. This Privacy Policy includes the following contents:

- I. Definition and Scope of Application
- II. How Do We Collect Your Personal Information
- III. How Do We Use the Collected Information
- IV. How Do We Use Cookie

V. How Do We Share, Transfer and Disclose Your Personal Information

VI. How Do We Protect Your Personal Information

VII. How Do We Store Your Personal Information

VIII. How to Manage Your Personal Information

IX. Protection of Minors' Personal Information

X. How Do We Update this Privacy Policy

XI. How to Contact Us

By using or continuing to use our services, you agree that we collect, use, store and share your relevant information in accordance with this Policy.

I. Definitions and Scope of Application

i. Definitions

1. **FSG Official Website Service Provider:** refers to the legal entity that develops and provides services on the official website of FSG, i.e., Shanghai Foreign Service (Group) Co., Ltd., hereinafter referred to as “FSG” or “we/us/our”.
2. **Affiliate:** refers to a shareholding or holding company or a wholly-owned subsidiary of FSG.
3. **This Policy/This Privacy Policy:** refers to the Privacy Policy for the Official Website of Shanghai Foreign Service (Group) Co., Ltd., as amended from time to time.
4. **Personal Information:** all types of information related to identified or identifiable natural persons recorded electronically or otherwise, excluding anonymized information.
5. **Sensitive Personal Information:** refers to personal information that, once leaked or illegally used, is likely to cause the human dignity of natural persons to be infringed or the personal and property safety to be endangered, including biometric information, religious beliefs, specific identities, medical and health information, financial accounts, whereabouts and other information, as well as the personal information of minors under the age of 14.
6. **Erasure of Personal Information:** refers to the act of removing personal information from the system of daily business functions, so that the personal information cannot be retrieved and accessed.
7. **Anonymization of Personal Information:** refers to the process in which personal information cannot be used to identify a specific natural person and restored after processing. The anonymized information does not fall under the scope of personal information.

ii. Scope of Application

This Policy is applicable to all services provided by the official website of FSG. You can access the official website of FSG and/or log in to relevant clients to use the services provided by the official website of FSG. If our affiliates use the services provided by the official website of FSG but do not provide a privacy policy on an individual basis, this Policy is also applicable to such services.

However, it should be noted that this Privacy Policy does not apply to services provided by other third parties. For example, when a third party on the official website of FSG provides services (such as a third-party payment channel) through the official website of FSG, the personal information provided by you to the third party is not bound by this Privacy Policy. Unless explicitly stipulated by the law, we will not be liable for any third party’s use of the information provided by you.

II. How Do We Collect Your Personal Information

When you browse and use the official website and services of FSG, there are two situations where we need/may need to collect your personal information:

1. In order to realize the basic functions of providing you with our services, **you must authorize** us to collect and use the necessary information. If you refuse to provide the corresponding information, you will not be able to browse and use our official website and services normally;
2. In order to realize the additional functions of providing you with our services, **you may choose to authorize** us to collect and use the relevant information. If you refuse to provide the corresponding information, you will not be able to normally use the relevant additional functions or achieve the intended effects; however, this will not affect your normal browsing and use of the basic functions of our official website and services.

i. The personal information voluntarily provided by you and collected by us with your authorization when you use our services

In order to provide you with the services on the official website of FSG, improve and optimize the service experience on an ongoing basis and ensure the security of your account, we will, with your authorization, collect the information voluntarily provided by you when you use the services on the official website of FSG, as well as the information generated when you use the services on the official website of FSG, for the following purposes and by the following methods:

1. In order to comply with the requirements of laws and regulations and provide you with more convenient services, if you desire to obtain more information and services, you need to provide at least **your name, mobile phone number (subject to real name authentication), email address, your employer's name, desired services and other information** to help us understand your service needs. If you only need the browsing, searching and similar functions, you are not required to provide the foregoing information.
2. The information you submit when you put forward suggestions, dispute handling applications, complaint/feedback or participate in our return visits, market research or similar activities through our customer service, including **your name, phone number, address and other information in the questionnaire you filled out** when you participated in our research activities.
3. Some of our services may require you to **provide specific sensitive personal information to achieve specific functions**. If you do not agree to provide such information, you may not be able to normally use specific functions in the service, but your use of other functions in the

service will not be affected. If you provide your sensitive personal information on your own initiative, it means that you agree to our processing of your sensitive personal information according to the purposes and methods described in this Policy.

ii. The information obtained by us when you use our services

When you are using the services on the official website of FSG, in order to provide you with services, interactive displays, search results, etc. that better meet your needs, maintain the normal operation of the official website of FSG, and improve and optimize your user experience of the official website of FSG, we will associate the following information together:

1. Device information

We will **receive and record the information (such as hardware model, device MAC address, operating system type, software list, unique device identifier and other software and hardware feature information) related to the device you use, the information related to device location (such as IP address, GPS/BeiDou location information and sensor information such as WiFi access point, Bluetooth and base station that can provide relevant information)** according to the specific permissions you grant during use.

2. Log information

When you browse our official website, we will automatically collect your detailed browsing information of our official website and save it as a relevant weblog, including **your search history, IP address, browser type, telecom operator, language used, access date and time, web pages visited and other operation log information, as well as other information and details you browsed or requested when using our services.**

Please note that device information, log information, etc. are information that cannot identify a specific natural person. If we combine this kind of non-personal information with other information to identify a specific natural person, or combine it with personal information, then during the combined use, this kind of non-personal information may be regarded as personal information. Unless with your authorization or otherwise specified by laws and regulations, we will anonymize and de-identify this kind of personal information.

3. The information provided by you

In the process of browsing the official website of FSG, you can give user experience feedback on the products, functions, applications and services displayed on the official website of FSG, so as to help us better understand your user experience and demand for our products or services, and improve our products or services. For this purpose, we will record **your contact information, feedback, questions or suggestions,** so that we can contact you for further handling of your feedback.

iii. Exceptions for consent

You are fully aware that we do not need your authorization and consent to collect and use personal information in any of the following circumstances:

1. Where it is related to national security and/or national defense security;
2. Where it is related to public safety, public health and/or major public interests;
3. Where it is related to criminal investigation, prosecution, trial and enforcement of judgments;
4. Where it is for the purpose of safeguarding the life, property and other major legal rights and interests of the personal information subject or other individuals, but it is difficult to obtain their consent;
5. Where the personal information collected has been disclosed to the public by the personal information subject;
6. Where the personal information is collected from legally disclosed information, such as lawful news reports, government information disclosure and other channels;
7. Where it is necessary for contract signing according to your requirements;
8. Where it is necessary for maintaining the safe and stable operation of the products and/or services provided, such as discovering and handling the faults of the products and/or services;
9. Where it is necessary for lawful news reporting;
10. Where it is necessary for an academic research institution to carry out statistics or academic research based on the public interest, and when providing the results of academic research or description to the public, the personal information contained in the results are de-identified;
11. Other circumstances stipulated by laws and regulations.

Please note that the information that cannot identify you or establish direct contact with you independently or in combination with other information is not regarded as personal information, and the storage and processing of such information will not require further notice to and consent from you.

III. How Do We Use the Collected Information

i. We will use the information you voluntarily provide/we collect for the following purposes:

1. Introduce our products/services to you;
2. Help us design new products/services and improve our existing products/services;
3. Make us know more about your needs for our products/services, so as to respond to your needs in a targeted way;

4. In order to show you product/service information more suitable for your needs, we will collect and use the device information or service log when you visit or use the official website of FSG to form a group feature tag, which is used to provide you with marketing notifications, commercial electronic information, push and other information;

5. Invite you to participate in the survey on our products/services to improve our products/services;

6. We will make statistics on the demand for our products/services, and may share these statistics with the public or a third party to show the overall demand trend of our products/services. However, these statistics do not contain any of your identification information.

ii. We use your personal information according to the following rules:

1. After collecting your personal information, we will de-identify the information through technical means, and the de-identified information cannot be used to identify the information subject. **Please understand and agree that in this circumstance, we have the right to use the de-identified information, and to analyze and commercialize the user database on the premises of not disclosing your personal information;**

2. When we display your personal information, we will desensitize your information by such means as content replacement and anonymization, to protect your information;

3. When we need to use your personal information for other purposes not specified in this Policy, or when we need to use the information for other purposes collected for specific purposes, we will obtain your express consent and authorization in advance;

Please note that for all personal information you provide when browsing and using our official website and services, we will have a continuous authorization to use the same during your browsing and using our official website and services unless you delete or refuse us to collect the same through system settings.

IV. How Do We Use Cookies

1. In order to meet your needs for Internet access, make your access experience easier, and recommend content that you may be interested in, we will store a small data file named Cookie on your device terminal or system. When you visit the official website of FSG, we can identify you and provide you with better and more services through data analysis, including using small data files to identify you. This is to understand your user habits and help you avoid inputting information repeatedly. These data files may be Cookie, Flash Cookie, or other local storage provided by your browser or associated applications (collectively referred to as “Cookies”).

2. We will not use Cookies for any purpose other than those stated in this Privacy Policy. You can manage or delete Cookies according to your preferences. You can erase all Cookies saved on your computer or mobile device, and you have the right to accept or reject Cookies. Most browsers will automatically accept Cookies, but you can modify your browser's settings to reject Cookies according to your own needs.

3. Please understand that some of our services may only be provided by using Cookies. **If your browser or browser add-on service allows, you can modify the degree of acceptance of Cookies or refuse Cookies on the official website of FSG.** However, in some circumstances, if you refuse Cookies on the official website of FSG, you may not be able to use some functions of the official website of FSG based on Cookies.

V. How Do We Share, Transfer and Disclose Your Personal Information

i. Sharing

We will not share your personal information with companies, organizations and individuals other than the FSG Official Website Service Provider, except for the following circumstances:

1. After obtaining your explicit consent or authorization (including the authorization of the user or the user's guardian), we will share your personal information with other parties.

2. We may share your personal information according to laws and regulations, litigation, dispute resolution needs, or according to the requirements of administrative, judicial and other relevant authorities according to law.

3. **We may share your personal information with affiliates:** in order to provide you with consistent services and facilitate your unified management, we may share your personal information with our affiliates. However, we will only share necessary personal information. If we share your sensitive personal information or our affiliate changes the purpose of using your personal information, we will re-obtain your authorization.

4. **We may share your personal information with business partners:** we may share order information, account information, payment information, etc. necessary for providing services to you with business partners. Our business partners include the following types:

1) **Suppliers/service providers.** For the purposes stated in this Privacy Policy only, some of our services will be provided by our business partners. We may share your personal information with such business partners.

2) **Marketing partners.** When we carry out joint marketing activities with a third-party marketing partner, we will share the prize-winning information and the contact information you provide to the third-party marketing partner, so that it can grant you prizes in time.

3) **Advertising, service analysis partners and other business partners.** With your authorization, we may share information with business partners that provide advertising and statistical analysis services to us, but we will only provide these partners with information such as the coverage, effectiveness and statistics of advertising, and will not share personal information that can identify you. Otherwise, we will anonymize such information to avoid identification. Relevant business partners may aggregate and analyze such information for advertising exposure monitoring or service decision-making.

5. **We may share your personal information based on agreements:** it is necessary to share your personal information with a third party according to the relevant agreements (including electronic agreements and platform rules signed online) or legal documents signed between you and us.

Please know that we will only share your personal information for lawful, justified, necessary, specific and definite purposes. For companies, organizations and individuals with whom we share personal information only for the purposes stated in this Privacy Policy, we will enter into stringent information protection and confidentiality agreements with them, requiring them to abide by the agreement and take security measures no less than those set out in this Privacy Policy to protect your personal information. Besides, we will follow the following information sharing principles:

1) **Principle of authorization and consent:** sharing your personal information with a third party other than the FSG Official Website Service Provider requires your authorization and consent, unless the shared personal information is de-identified, and the third party cannot re-identify the specific information subject. If our affiliates and third parties use the information for purposes beyond the scope of the original authorization, they need to obtain your consent again.

2) **Principle of lawfulness and minimum necessity:** sharing your personal information with a third party other than the FSG Official Website Service Provider shall be for a lawful and justified purpose, and be limited to the extent necessary to achieve the purpose.

3) **Principle of prudence:** we will prudently evaluate the purpose of sharing information with affiliates and third parties, comprehensively evaluate the security guarantee ability of these business partners, and require them to comply with laws and regulations.

ii. Transferring

We will not transfer your personal information to any company, organization or individual, except for the following circumstances:

1. We have obtained your explicit consent and authorization;

2. It is necessary according to applicable laws and regulations, requirements of legal proceedings, and/or mandatory administrative or judicial requirements;
3. It is in line with relevant agreements signed with you (including electronic agreements and platform rules signed online) or other legal documents;
4. In the event of merger, acquisition, asset transfer or similar transactions between us and our affiliates, if the transfer of personal information is involved, we will require the company or organization to which your personal information is transferred to continue to be bound by this Privacy Policy; otherwise, we will require such company or organization to re-obtain your authorization and consent.

iii. Disclosure

We will only disclose your personal information under the following circumstances and under the premise of taking protection measures in line with industry standards:

1. We will disclose the personal information specified by you in the disclosure method explicitly agreed by you with your explicit consent or based on your own initiative;
2. When it is necessary to provide your personal information according to the requirements of laws and regulations, mandatory administrative law enforcement or judicial requirements, we may disclose your personal information according to the type of personal information and the disclosure method as required. To the compliance with laws and regulations, when we receive the above request for information disclosure, we will require the presentation of corresponding legal documents, such as subpoenas or investigation letters. We have prudently reviewed all requests to ensure that they have legal basis and are limited to the data that law enforcement departments have legal rights to obtain for specific investigation purposes. To the extent permitted by laws and regulations, the documents we disclose are protected by encryption keys.

Please note that the information you voluntarily publish or even publicly share when using our services may involve your or others' personal information or even sensitive personal information, such as the information about the services or products provided by FSG. Please be more careful about publishing or even publicly sharing the relevant information when using our services. We will not be liable for any loss caused by your voluntary publication and/or sharing of relevant information.

iv. Exceptions to prior consent for the sharing, transferring and disclosure of personal information

You understand and agree that the sharing, transferring and disclosure of your personal information do not require your prior consent in any of the following circumstances:

1. Where it is directly related to national security and/or national defense security;

2. Where it is directly related to public safety, public health and/or major public interests;
3. Where it is directly related to criminal investigation, prosecution, trial and enforcement of judgments;
4. Where it is for the purpose of safeguarding your or other's life, property and other important legitimate rights and interests, but it is difficult to obtain your consent;
5. Where it is the personal information disclosed to the public by yourself;
6. Where it is the personal information collected from legally disclosed information, such as lawful news reports, government information disclosure and other channels.

Pursuant to the law, if we share, transfer or disclose anonymized personal information, and ensure that the data receiver cannot restore the anonymized personal information and identify the personal information subject, we will not need to notify you separately and obtain your consent for the processing of such information.

VI. How Do We Protect Your Personal Information

i. Data security technology

To ensure your information security, we strive to take reasonable and feasible security protection measures in line with industry standards to protect your information and prevent unauthorized access, disclosure, use, modification, damage or loss of personal information. For example, the official website of FSG adopts the encryption technology such as transport layer security (TLS) protocol, provides HTTPS protocol secure browsing mode to ensure the security of user data during transmission, uses the trusted protection mechanism to prevent malicious attacks on data, deploys an access control mechanism to ensure that only authorized personnel can access personal information, and holds security and privacy protection training courses to enhance employees' awareness of the importance of personal information protection.

ii. Security system certification

FSG has passed the ISO27001:2013 information security management system standard certification, obtained the Information System Security Protection (Level II) Certificate, and established a good coordination and communication mechanism with regulatory agencies and third-party evaluation agencies to prevent and handle various information security threats in time, providing all-round guarantee for your information security.

iii. Information security incident handling

In the event of a personal information security incident, we will immediately set up a special emergency response team, initiate the emergency plan, prevent the expansion of the security incident, and timely inform you of the basic situation and possible impact of the security

incident, the handling measures we have taken or will take, the suggestions for you to prevent and reduce risks, and the remedial measures for you according to the requirements of laws and regulations.

We will inform you of the relevant information of the incident in a timely manner by email, letter, telephone, push notification, etc. when it is difficult to inform the personal information subject one by one, and we will take reasonable and effective measures to issue an announcement. At the same time, we will actively report the handling of personal information security incidents in accordance with the requirements of the regulatory authorities.

VII. How Do We Store Your Personal Information

i. Storage location:

We will store in the territory of the People's Republic of China the personal information collected and generated during the operation of services on the official website of FSG in the territory of the People's Republic of China.

ii. Storage period:

We will take reasonable and feasible measures to store your personal information. Unless otherwise provided by laws and regulations or agreed by the parties concerned, we will only retain your relevant personal information for the shortest time necessary to achieve the purpose.

iii. Termination of service or operation

In the event of termination of service or operation, we will make an announcement at least thirty (30) days in advance, and delete or anonymize your personal information upon termination of service or operation.

VIII. How to Manage Your Personal Information

FSG attaches great importance to your attention to your personal information, and will do its best to protect your rights to access, correct and erase your personal information and withdraw your consent, so that you have sufficient ability to ensure your privacy and security. Your rights include:

i. Inquire, correct and supplement your information

You can call our customer service hotline at 4001962002 to help you inquire, correct and supplement your information. Before you inquire, correct and maintain your information, we will carry out client identity authentication. Upon successful client identity authentication, the inquiry, correction and maintenance will be deemed as your operation by default, and you will be responsible for the client information security.

ii. Erase your information

You can erase your information through the methods listed in the section “i. Inquire, correct and supplement your information” above. You can request us to erase your personal information in any of the following circumstances:

1. Where our handling of personal information violates laws and regulations;
2. Where we collect and use your personal information without your explicit consent;
3. Where our handling of personal information materially violates our agreement with you;

If we decide to respond to your request for erasure, we will also notify the subjects who have obtained your personal information from us as far as possible and require them to erase the same in time (unless otherwise provided by laws and regulations, or these subjects have obtained your separate authorization).

After we assist you in erasing relevant information, we may not be able to erase the corresponding information from the backup system immediately due to the requirements of applicable laws and the restrictions of security technologies. We will securely store your personal information and isolate it from any further processing until the backup can be erased or anonymized.

iii. Change the scope of your authorization or withdraw your authorization

You can change or erase information through our customer service hotline, or change the scope of authorization or withdraw your authorization by closing the corresponding permissions in the system.

Please understand that after you perform the above operations, we will not be able to continue to provide you with the service corresponding to the authorization withdrawn; however, this will not affect the processing of personal information that has been carried out based on your authorization.

iv. Respond to your foregoing requests

For security purpose, you may need to provide a written request or prove your identity in other ways. We may request you to authenticate your identity before processing your request. We will reply to your request within fifteen (15) days.

In principle, we do not charge any fee for your reasonable request, but we will charge a certain fee as appropriate for repeated and/or unreasonable requests. We may refuse your request for information that is not directly related to your identity, repeated without cause, or requires too many technical means (such as the need to develop new systems or fundamentally change existing practices), poses risks to the legitimate rights and interests of others, or is unrealistic.

According to the requirements of laws and regulations, we may not be able to respond to your request in any of the following circumstances:

1. Where it is related to national security and/or national defense security;
2. Where it is related to public safety, public health and/or major public interests;
3. Where it is related to criminal investigation, prosecution, trial and enforcement of judgments;
4. Where there is sufficient evidence to show that the personal information subject bears malicious intent or abuses its rights;
5. Where the response to your request will cause serious damage to the legitimate rights and interests of you or other individuals and organizations;
6. Where it involves the trade secrets of FSG, FSG's affiliates or other third parties.

IX. Protection of Minors' Personal Information

1. FSG attaches great importance to the protection of minors' personal information. If you are a minor under the age of 14, you should obtain the written consent of your parents or legal guardians in advance before browsing and using our official website and services. FSG protects minors' personal information in accordance with relevant national laws and regulations.
2. For the collection of personal information of minors with the consent of parents or legal guardians, we will only use or disclose the information collected when permitted by law, explicitly agreed by parents or guardians or necessary for the protection of minors.
3. If we find that we have collected the personal information of minors without the prior consent of verifiable parents or legal guardians, we will try to delete the relevant data as soon as possible.
4. If you are a minor, we request you to ask your parents or legal guardians to carefully read this Privacy Policy, and browse and use our official website and services with the written consent of your parents or legal guardians. If your parents or legal guardians do not agree that you use our services or provide us with information in accordance with this Policy, please stop using our services immediately and notify us of the same in time so that we can take corresponding measures.

We will protect the confidentiality and security of minors' personal information in accordance with relevant national laws and regulations.

X. How Do We Update this Privacy Policy

This Privacy Policy is subject to update.

Without your express consent, we will not restrict your rights under this Privacy Policy. We will announce any changes to this Privacy Policy on the official website of FSG, and please

keep informed of the latest Privacy Policy. Under the above circumstances, if you continue to browse and use our official website and services, you agree to accept and be bound by the updated Privacy Policy.

XI. How to Contact Us

If you have any questions or comments about this Privacy Policy, you can contact us by phone or email. The contact information is as follows:

Shanghai Foreign Service (Group) Co., Ltd.

Email: smcl@fsg.com.cn

Tel: 4001962002

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