Overview

Privacy Policy for Shanzhi Asia Services

This Privacy Policy, together with our Shanzhi Asia Services

Terms and Conditions, governs all activities of Shanzhi Asia to collect, process, save, share and transfer your Personal Information. As used in this Privacy Policy, "Shanzhi Asia" and "we" refers to the contracting parties in the Account Jurisdiction associated with your Payment Account, as detailed below.

By reading the terms set forth here, you are specifically accepting the present Shanzhi Asia Privacy Policy ("Privacy Policy" or "Policy") and consenting to the collection, processing and transferring of your Personal Information, as described in this Shanzhi Asia Privacy Policy.

This Privacy Policy will help you understand the following:

- 1. Policy Brief
- 2. How we collect the information
- 3. The information we collect
- 4. How we use your Personal Information
- 5. How we share, entrust processing, transfer, and publicly disclose your Personal Information

- 6. The cross-border transfer and storage of your Personal Information
- 7. How we protect your Personal Information
- 8. How we use browser caching(cookie) and similar technologies
- 9. How you exercise your rights to Personal Information
- 10. Contact us
- 11. Updates to the Privacy Policy

12. Legal liabilities

This Privacy Policy forms a valid part of the Shanzhi Asia
Services Terms and Conditions. The terms described in the
Shanzhi Asia Services Terms and Conditions also apply to this
Policy.

Privacy Policy for Shanzhi Asia Services

1.Introduction

In order to make Shanzhi Asia's services available to you in compliance with the obligations imposed by Applicable Law and by regulatory authorities, Shanzhi Asia must ask you for certain information about yourself. Shanzhi Asia will utilize the Personal Information provided by you in accordance with applicable

provisions of governing data protection laws. The information and materials obtained shall, as a matter of principle, be used by Shanzhi Asia solely for providing Shanzhi Asia Services and solely to the extent necessary to render such services. Shanzhi Asia shall only process your Personal Information in accordance with the provisions of this Policy. If Shanzhi Asia needs to process your Personal Information for purposes other than those stipulated in this Policy, it shall obtain your consent or authorization again on the premise of complying with applicable data protection laws.

2. How we collect information

"Personal Information" refers to various information related to identified or identifiable individuals, and "Personal Information" does not include anonymized and/or aggregated data that does not identify a specific person.

A.Collected from Website Visitors

Like most website operators, Shanzhi Asia automatically collects non-Personal Information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of

each visitor request. Shanzhi Asia's purpose in collecting non-Personal Information is to better understand how Shanzhi Asia's visitors use its website, through cookies, web beacons, log files and other technologies:

- 1. Your domain name, your browser type and operating system, web pages you view, links you click;
- 2. Your IP address, the length of time you visit our Website or use our Services, your activities on our Website, and the referring URL or the webpage that led you to our Website.

Please see Section 8 "Cookies" below for more information.

Visitors can always refuse to supply Personal Information, with the caveat that it may prevent them from being able to use Shanzhi Asia's services.

B.Provided by Users

You may provide us data about you by filling in forms on our website (e.g. Shanzhi Asia Account Registration), or by corresponding with us (for example, by e-mail or telephone). The data you provide may include data about additional persons that are beneficial owners of the Shanzhi Asia Services. This includes that is provided to us about you:

1.upon registration for a Shanzhi Asia Account;

2.when you log in to your Shanzhi Asia Account;

3.when you submit any transaction instructions through your Shanzhi Asia Account;

4.when entering a promotion or survey;

5.when a problem is reported or a request for support is received. Visitors can always refuse to supply Personal Information, with the caveat that it may prevent them from being able to use Shanzhi Asia's services.

C.Collected from our business partners We may collect your
Personal Information from our cooperating financial institutions,
Internet platforms, service providers, etc. When collecting your
Personal Information from the above-mentioned business
partners, we will require the business partners to ensure the
legality of the source of Personal Information and confirm the
scope of authorization for Personal Information processing
obtained by them. If our processing activities of your Personal
Information exceed the authorized scope, we will obtain your
consent again.

3.Information we collect

A.Basic business functions provided by Shanzhi Asia include applying for a Payment Account, Inbound Transaction, and

Withdrawal Transactions, etc. We need to collect some necessary Personal Information from you in order to provide such services. If you disagree to provide the information, you may not be able to use relative services.

Applying for a Payment Account:

- 1. Your contact information (e.g., name, email address, phone number, billing or mailing address)
- 2.Identity validation (e.g., photograph, other information requested to verify your information, including copy of valid ID document)
- 3. Category of National identification cards and numbers
- 4. Nationality
- 5.Date and place of birth
- 6.Biometric information (such as photos, voice or/and facial recognition information provided through third-party platforms, etc.)
- 7.IP address
- 8. Publicly available and/or criminal

history Inbound Transaction:

Details of any transactions associated with the Inbound
Payments(such as transaction date, transaction number, amount
of transaction, transaction currency and transaction details).

Withdrawal Transactions:

Your bank card or Beneficiary Account information (such as bank name, country, code, account type and account number, etc.)

Dealing with the problems arising from your use of the Shanzhi Asia service:

Any other information that you choose to provide to us (e.g., if you send us an email/otherwise contact us) In order to keep you update with our promotion activities, new products/new business, etc. we may need to use your calls/emails/other correspondence. If you are not willing to receive the above marketing information, you can contact us to refuse to receive it, and it will not prevent you from using the other Shanzhi Asia services.

Information through Cookies and other tracking technologies as listed abovedescribed in the section below entitled "Cookies" You are responsible for providing accurate and up-to-date information.

B. If you are required to provide information about shareholders or beneficial owners of your business, you acknowledge that you have that person's consent to provide his/her information to us. This may include:

- 1. Contact information, such as name, home address, and email address.
- 2. Account information, such as username and password.
- 3. Financial information, such as bank account numbers, bank statement, and trading information.
- 4.Identity verification information, such as images of your government issued ID, passport, national ID card, or driving license.Note: US residents may be asked to provide their social security numbers.
- 5. Residence verification information, such as Utility bill details or similar information.

C.We may collect and process Personal Data about Buyers or third parties related to your business in providing Shanzhi Asia Services. You are responsible for making sure that the privacy rights of any third parties, including Buyers and other individuals related to your business, are respected, including ensuring appropriate disclosures about third party data collection and use; with respect to such data you hereby (i) are deemed to be and (ii) accept to be Personal Information controller. To the extent that we are acting as your entrusted Personal Information processor, we will process Personal Data in accordance with the terms of our Privacy Policy and your lawful instructions.

4. How we use your Personal Information

We will only use your Personal Information to:

- 1.Process your transactions, including transfers into the your residential country and regions in accordance with Applicable Laws.
- 2.Perform the required controls and checks in accordance with money laundering/terrorist financing and know your customer requirements under Applicable Law, and internal control policies, and well as address other law enforcement needs as more fully described in our Shanzhi Asia Services Terms and Conditions.

 3.For the stability of Shanzhi Asia service, protect your property, prevent loss and fraud.
- 4. Analyse Shanzhi Asia website usage, and improve our website and website offerings.
- 5.Help us respond to your customer service requests and support needs.
- 6.Contact you about Shanzhi Asia Services. The email address you provide may be used to communicate information and updates related to your use of the Shanzhi Asia Services. We may also occasionally communicate company news, updates, promotions, and related information relating to similar products

and services provided by Shanzhi Asia.

7.Administer a promotion, survey or other site features as will be more explained on the website. For the sake of clarity, Shanzhi Asia shall in no event apply any of your Personal Information to conduct any direct marketing as defined in the Personal Data (Privacy) Ordinance (Cap. 486) without your consent.

5. How we share, entrust processing, transfer, publicly disclose your Personal Information

Shanzhi Asia discloses your related Personal Information only (a) to legal and regulatory authorities as required by Applicable Law, and (b) to those of its employees, service providers and affiliated organizations that (i) need to know that information in order to process it or to provide services, and (ii) that have agreed not to disclose it to others, as described below.

A.Entrusted processing

Some functions and modules of Shanzhi Asia service are provided by our affiliated companies and business partners. We may entrust affiliated companies and business partners to process your Personal Information. We will require the trustee to abide by strict Personal Information protection obligations

through written agreements and other means, process your

Personal Information according to our requirements, and take
necessary measures to supervise its Personal Information
processing activities.

B.Disclosure to Third Parties

In processing your transactions, we may share some of your Personal Information with Service Providers, business partner and other third party who help with our business operations. We will only disclose your Personal Information to third parties for legitimate, necessary and clear purposes on the basis of obtaining your consent. Your information will not be sold except to provide Shanzhi Asia Services or as required by law. By using our Services and accepting our terms, you consent to the disclosure of your Personal Information as described in this Privacy Policy. Shanzhi Asia's Service Providers, business partner and other third party are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We ensure that such third parties will be bound by terms no less protective those described in this Privacy Policy, or those we are subject to under applicable data protection regulations, including but not limited to the Applicable Law.

C.Disclosure to Authorities

We may share your Personal Information with law enforcement, data protection authorities, regulatory authorities, government officials, and other authorities when:

- 1. Compelled by subpoena, court order, or other legal procedure.
- 2.We believe that the disclosure is necessary to prevent physical harm or financial loss.
- 3. Disclosure is necessary to report suspected illegal activity.
- 4. Disclosure is necessary to investigate violations of this Privacy Policy or our Terms and Conditions.

D.Transfer

If it is necessary to transfer your Personal Information for reasons such as merger, division or dissolution, we will inform you of the name and contact information of the receiver. At the same time, we require new companies and organizations holding your Personal Information to continue to process your Personal Information in accordance with this Privacy Policy. Otherwise, we will require such companies and organizations to ask you for consent again.

E.Publicly Disclosure

Based on the requirements of Applicable Laws, we disclose your Personal Information when necessary. If disclosure is required, we will inform you of the purpose of disclosure and the type of Personal Information disclosed, and obtain your consent, unless otherwise specified by laws and regulations.

6.Cross-border Transfer and storage of your Personal Information

Our services are global and data may be stored and processed in the countries where we have operations or where we engage service providers in accordance with Applicable Laws. Data we collect may be transferred to and/or stored at a destination outside your country of residence or the Account Jurisdiction, which may have data protection rules that are different from those of your country, including transferring data to and from regulatory authorities, or to staff operating outside the country who process data on our behalf or for one of our suppliers. Staff may be engaged in the fulfilment of your request and the provision of support services. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your data remains protected to the standards described in this Privacy Policy. By submitting the data, you agree to this transfer, storing or processing. We will

take all steps reasonably necessary to ensure that the data is treated securely and in accordance with this Privacy Policy and the relevant data protection regulations. We will only retain your Personal Information for the period necessary to achieve the purpose stated in this Privacy Policy. We will strictly implement the principle of minimum storage period of your Personal Information. For example, according to the requirements of anti-money laundering laws and regulations, your Personal Information will be stored for at least five years after the end of business relationship. If the relevant data is no longer necessary and legally restricted for storage and use, we will promptly take measures to delete or anonymize the data.

7. How we protect your Personal Information

Shanzhi Asia takes all organizational and technical measures appropriate to protect against the unauthorized access, use, alteration or destruction of all Personal Information.

All data that you provide to us is stored on our secure servers. You are responsible for keeping your account credentials safe and secure and not sharing them with anyone. The transmission of information via the internet is not completely secure; any

transmission is at your own risk. Although no one can guarantee the security of data transmitted via the internet, we do our best to protect the data transmitted via the Shanzhi Asia Account.

1.We use industry standard(PCI–DSS) to help keep the data safe.

2.The Shanzhi Asia website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any User Data to these third parties.

8. How we use browser caching (Cookies) and similar technologies

To make this site work properly, Shanzhi Asia, similar to many other major websites, sometimes use small data files called cookies or other tracking technology to track information about your use of our website and services. We may use third party service providers to collect this information on our behalf.

A.What are cookies?

A cookie is a small text file that a website saves on your

computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

B.How we use cookies and tracking mechanisms

Shanzhi Asia's website uses the following cookies/tracking mechanisms.

- 1.Session cookies. Session cookies are temporary cookies that remain in the cookie file of your browser until you leave the site. We use session cookies to allow you to carry information across pages of our site and avoid having to re–submit the same information. The cookies will be deleted after your web browser has been closed.
- 2.Persistent cookies. Persistent cookies remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie). We use persistent cookies:
- (i)To help us recognize you as a unique visitor when you return to our website and to monitor your use of our website;
- (ii)To allow us to link you to any of our Partners of Affiliates should you come to our website through a paid advert or banner

on a website of an Affiliate or Partner. The cookies will be deleted based on their own expiration period after your web browser has been closed.

3.Web beacons. Some of our web pages may contain web beacons which allow us to count users who have visited these pages. Web beacons collect only limited information including a cookie number, time and date of a page view, and a description of the page on which 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.

C.How to control cookies

You can control and/or delete cookies as you wish — for details, see aboutcookies.org. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

9. How to exercise your right to Personal Information

A.Access your Personal Information

You can log into your Shanzhi Asia account to check your

identity information (e.g. email address, contact number, etc.), bank account information (e.g. withdrawal account), transaction records, etc. When you find that your Personal Information is wrong, you can ask us to correct it.

B.Delete your Personal Information

You can request us to delete your Personal Information under the following circumstances:

- 1.If our handling of your Personal Information violates the provisions of this Privacy Policy;
- 2.If our handling of your Personal Information violates Applicable laws;
- 3.If you no longer use our products or services, or you cancel your Shanzhi Asia account;
- 4. You withdraw your consent to process Personal Information from us.

Please note that some Personal Information may be necessary for us to provide you with basic business functions. Deleting this part of Personal Information may cause you to be unable to use some of our products or services.

C.Get a copy of your Personal Information

You have the right to obtain a copy of your Personal Information to understand the processing of your Personal Information in

Shanzhi Asia.

D.Cancel your Shanzhi Asia account

When you meet the agreed cancellation conditions, you can cancel your Shanzhi Asia account at any time. At that time, your account should not have any pending disputes, investigations or arrears.

E.Withdraw your consent

You may withdraw or change the scope of your consent to our processing of Personal Information, except where we really need to retain your relevant Personal Information according to Applicable Laws or regulatory provisions. Withdrawal of consent will not affect the previous processing of Personal Information based on your consent. You can contact us through the way agreed in Section 10, and we will respond to and handle your needs within a reasonable period.

10.Contact us

You can also contact us through Shanzhi Asia global customer service hotline (+852) 2882 8203 or online customer service on our official website, or send your needs to info@shanzhiasia.com.

We will follow up and solve your complaints, suggestions and needs.

11. Privacy Policy Changes

This Privacy Policy may be revised from time to time as new features are added to the Shanzhi Asia services or as we incorporate suggestions from our stakeholders. We may change this Privacy Policy at any time by posting a revised version of it on our website. We will provide you with at least 30 days' prior notice of the effective date of the revised Privacy Policy when it is legally required. We may post the notice on the front page of our website(s) and/or send the notice by e-mail. As of the effective date of the revised Privacy Policy, you will be considered as having consented to all changes to the Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time.

12.Liability

We are not liable to you in respect of any claims, losses, damages, expenses (including reasonable legal fees) arising out of or in connection with the use and/or disclosure or dissemination of the user data in accordance with this privacy policy and any consents that you may have otherwise provided to us.