

- TouchPal Privacy Policy -

Effective Date: August 1, 2018

1. What Information We Collect
2. How We Use Your Information
3. How We Share Your Information
4. Social Sharing Features
5. International Transfer of Personal Data
6. Security
7. Advertising and Analytics Services Provided by Others
8. Children's Privacy
9. Changes to This Privacy Policy
10. Your Choices
11. Contact Information

We take your privacy and data security seriously. This privacy policy ("Privacy Policy") is meant to help you understand what information Shanghai ChuLe (CooTek) Information Technology Co., Ltd. and its affiliates and subsidiaries (collectively, "CooTek", "we", "us" or "our") collect, how we use such information, and the recipients with whom we share such information.

This Privacy Policy applies to your access and use of the website at <http://www.touchpal.com/> (<http://www.touchpal.com/>) (the "Website"), the mobile applications made available in the U.S. versions of the Apple App Store and the Google Play Store (the "Apps"), the TouchPal Keyboard made available in the U.S. versions of the Apple App Store and the Google Play Store, along with any revisions, updates and/or modifications thereto (collectively, "TouchPal Keyboard") and any data, products, services and associated materials or media supplied with the TouchPal Keyboard (together with the Website, Apps, TouchPal Keyboard, the "Services") which are made available in the United States. This U.S. Privacy Policy only applies to access and use of the Services within the United States, and does not apply to any other data gathered or used by us, including through websites and mobile applications not listed above or to the information practices from other countries.

This Privacy Policy is incorporated into and made a part of the End User License Agreement (<https://www.touchpal.com/docs/web/index.html?area=usa&page=userAgreement>). Please review our End User License Agreement because it governs your use of the Services and limits our liability to you. By using our Services, you agree that we may treat your information in the ways we describe in this Privacy Policy. If you do not agree with any term of this Privacy Policy or the End User License Agreement, you may not use our Services. This Privacy Policy contains the following sections:

1. What Information We Collect

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you register for an account, sign up for a subscription, participate in any interactive features of the Services, subscribe to a newsletter or email list, participate in a survey, contest, promotion or event or otherwise communicate with us.

The types of information we may collect from you include:

(a)**Account Information:** We may collect information relating to your account, such as your name, email address, password, postal address, phone number, subscription and any other information you choose to provide.

(b)**Transaction Information:** We may collect information relating to any products and services you purchase from us. We may also collect and store limited payment information from you, such as payment card type; however, we do not collect or store full payment card numbers and all transactions are processed by our third party payment processor.

(c)**Input Information:** We will ask you to install and enable our TouchPal Keyboard on your mobile device. The TouchPal Keyboard runs in the background, logging your keystrokes on your mobile device. We will collect information that you input using the TouchPal Keyboard, such as the text you enter into any textbox, content of voice recognition, and other content you enter when using any other applications on your mobile device.

(d) **Other Information You Choose to Provide**, such as when you participate in a survey, contest, promotion or interactive area of the Services or when you request technical or customer support.

Information We Collect Automatically

When you access or use the Services, the types of information we may automatically collect about you include:

(a) **Log Information:** When you visit the Services, our servers automatically record certain log file information, such as your Internet Protocol (“IP”) address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Services.

(b) **Mobile Device Information:** We collect information about the mobile device you use to access or use the Services, including the hardware model, operating system and version, **unique device identifiers**, mobile network information and information about your use of the Services. With your consent, we may also collect information about the location of your device and access and collect information from certain native applications on your device (such as your device’s camera, photo album and phonebook applications) to facilitate your use of certain features of the Services. For more information about how you can control the collection of location information and/or our access to other applications on your device, please see “Your Choices” below.

(c) **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers **use various tracking technologies**, including **cookies** and **web beacons**, to collect information about you when you interact with our Services, including information about your browsing and purchasing behavior. Cookies are small data files stored on your hard drive or in device memory that help us improve the Services and your experience, see which areas and features of the Services are popular, and count visits. Web beacons are electronic images that may be used in the Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see “Your Choices” below.

Information We Collect From Other Sources

We may also obtain information about you from other sources and combine that with information we collect directly. For example, we may collect information about you when you post content to our pages or feeds on third party social media sites, or if you use credentials (e.g., username and password) from a third party site to create or log into your CooTek account.

2. Use of Information

We may use information about you for various purposes, including to:

(a) Provide, maintain and improve the Services;

- (b) Manage your account and send you related information, including confirmations, updates, technical notices, security alerts and support and administrative messages;
- (c) Respond to your comments, questions and requests and provide customer service;
- (d) Communicate with you about the Services, offers, surveys, events and other news and information we think may be of interest to you;
- (e) Monitor and analyze trends, usage and activities in connection with the Services;
- (f) Detect, investigate and prevent fraudulent transactions and other illegal activities and protect our and others' rights and property;
- (g) Personalize and improve the Services and provide advertisements, content and features that match your profile or interests;
- (i) Link or combine with information we get from others to help understand your needs and provide you with a better experience; and
- (j) Carry out any other purpose for which the information was collected.

3. Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

- (a) With vendors, consultants and other service providers who need access to such information to carry out work or perform services on our behalf;
- (b) When you participate in the interactive areas of the Services or interact with us on third party social media sites, certain information that you provide may be displayed publicly, such as your name, photos and other information you choose to provide;
- (c) We may share your information with third parties and service providers that provide products or services to us, that help us market or advertise to you (including co-branded marketing and advertising), or that provide products or services to you.
- (d) We also provide information and content to research partners and academics to conduct research that advances scholarship and innovation that support our business or mission, and enhances discovery and innovation on topics of general social welfare, technological advancement, public interest, health, and well-being;
- (e) In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, rule, regulation or legal process;
- (f) If we believe your actions are inconsistent with our End User License Agreement or other policies, or to protect the rights, property or safety of CooTek or others;

- (g) In connection with, or during negotiations of, any merger, acquisition, sale of assets or any business, other change of control transaction or financing;
- (h) Between and among CooTek and any current or future parent, subsidiary and/or affiliated company; and
- (i) With your consent or at your direction.

We also may share aggregated or de-identified information, which cannot reasonably be used to identify you.

4. Social Sharing Features

The Services may offer social sharing features and other integrated tools, such as the Facebook and Twitter buttons (e.g., “Like” or “Tweet”), which let you share actions you take on the Services with other media. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

5. International Transfer of Personal Data

The Services which link to this U.S. Privacy Policy are intended for use in the United States of America only. If you access or use our Services which link to this U.S. Privacy Policy from outside of the United States of America, please be advised that (i) any information you provide to us or that we automatically collect will be transferred to the United States of America; and (ii) that by using our Services or submitting information, you explicitly authorize its transfer to and subsequent processing in the United States of America, which is a country that may not have the same or comparable data protection laws as you do under your country’s laws.

6. Security

The security of your information is important to us. We implement and maintain reasonable security measures intended to protect against unauthorized use, disclosure, alteration or destruction of the information we collect and maintain. However, please be aware that, despite our efforts, no data security measures, no method of transmission over the Internet, and no means of electronic or physical storage, is absolutely secure. As such, you acknowledge and

accept that we cannot guarantee the absolute security of your information transmitted to, through, or on the Services or via the Internet and that, any such transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access to a CooTek account, you are responsible for keeping this password confidential. Please do not to share a password with anyone.

7. Advertising and Analytics Services Provided by Others

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Services and other websites and better understand your online activity.

If you want to stop receiving personalized ads, you can go to “Settings” of TouchPal Keyboard, once you choose not to receive personalized ads, we and our third-party partners will stop sending personalized ads to you. Please note that the number of ads you see will not change, but they may be less relevant to you.

8. Children’s Privacy

The Services are not intended for children under the age of 18. Children under the age of 18 must not use the Services for any purpose without first obtaining legally valid parental/guardian consent to this Privacy Policy (both for themselves and on your behalf). We do not knowingly collect personal information from any children under the age of 18 without such consent. Please contact us if you believe we have any personal information from any children under the age of 18 without such parental/guardian consent. We will take reasonable steps to delete it as soon as possible.

9. Changes to This Privacy Policy

We reserve the right to amend this Privacy Policy at any time. You will know if the Privacy Policy has changed since the last time you reviewed it by checking the “Effective Date” included at the beginning of the document. If we make a material change to the Policy, you will be provided with

appropriate notice in accordance with legal requirements. By continuing to use the Services after changes have been posted, you are confirming that you have read, understood and consented to the latest version of this Privacy Policy.

10. Your Choices

(a) Account Information

You may update, correct or modify information about you at any time by logging into your online account or by emailing us at privacy@touchpal.com. If you wish to deactivate your account, please email us at privacy@touchpal.com, but note we may continue to store information about you as required by law or for legitimate business purposes.

(b) Location Information

With your consent, we may collect information about your actual location when you use our mobile applications. You may stop the collection of this information at any time by changing the settings on your mobile device, but note that some features of our mobile applications may no longer function if you do so.

(c) Native Applications on Mobile Device

Some features of our mobile applications may require access to certain native applications on your mobile device, such as the camera and photo storage applications (e.g., to take and upload photos) and the phonebook application (e.g., to send invitations to your contacts to try the Services). If you decide to use these features, we will ask you for your consent prior to accessing the applications and collecting information. Note that you can revoke your consent at any time by changing the settings on your device.

(d) Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Services.

(e) Promotional Communications

You may opt out of receiving promotional communications from us by following the instructions in those communications or by emailing us at privacy@touchpal.com (<mailto:privacy@touchpal.com>). If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

(f) Push Notifications

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

(g) Your California Privacy Rights

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. If you are a California resident, you may request this information once per calendar year by writing to us at Building 7, 2007 Hongmei Road, Xuhui District, Shanghai, P.R. China.

11. Contact Information

If you have any questions or opinions regarding this Privacy Policy, you may contact us at: privacy@touchpal.com (<mailto:privacy@touchpal.com>).