# Privacy and Personal Data Protection Policy

Last updated: April 16, 2021

Dear customer,

Thank you for using the products and services provided by OSCAL and its global affiliates (hereinafter referred to as "OSCAL" or "we", "us", or "our"). To ensure that you can be updated with and reserve control over your privacy and personal information, please carefully read the Privacy and Personal Data Protection Policy (hereinafter referred to as this "Policy").

This policy describes your data subject rights and how we process your personal data. This policy applies to all products and services provided by OSCAL, unless otherwise stipulated in specific privacy policy or statement. The products and services mentioned in this Policy may vary depending on your software version, device model, or location. For details about the data collection for specific products or services, refer to the corresponding agreements, policies, or statements.

We take your privacy seriously and are committed to protecting your private information and life against unauthorized access or intrusion. We will process your personal data under the principles of lawfulness and fairness, and the minimum necessary standard. We will take appropriate security measures to protect your personal data according to established industry security standards, in addition to applicable legal or regulatory requirements.

This Policy describes:

1. What Data Do We Collect About You

2. Why We Process Your Personal Data

3. How We Share, Transfer, or Disclose Your Personal Data

4. How We Control Your Personal Data Independently or Jointly with Third Parties

5. How You Control Your Personal Data

6. How We Protect Your Personal Data

7. Protection of Minors

8. How We Manage Cookies and Similar Technologies

9. How We Store Your Personal Data

10. Contact Us

11. How We Update this Policy

## 1. What Data Do We Collect About You

Personal data refers to a variety of information recorded electronically or otherwise that can be used alone or in combination with other information to identify a particular natural person, expect otherwise defined in specific laws or regulations in your country/region. Personal data typically includes but is not limited to your name, date of birth, ID number, biometric information, address, and phone number. We will describe what data we will process under different circumstances:

(1) Personal data you provide to us

You are required to provide your name, gender, email address, and phone number, when you register an account for OSCAL products or services.

(2) Personal data obtained by us when providing services to you

We will collect your device information, and how you and your device interact with OCSAL products and services, including:

(a) Device and app information, such as device name, device identifier, device activation time, hardware model, hardware system version, app version, software identifier, and device and app settings (such as region, language, time zone, and font)

(b) Mobile network information, such as the public land mobile network (PLMN) provider ID, geographical location (cell ID of the area where the device is located), and Internet protocol (IP) address

(c) Log information. When you use our services or view content provided by us, we will automatically collect certain information and record it in logs, such as the time of access, access count, IP address accessed, and event information (such as error, crash, restart, and upgrade).

(d) Location information (applicable only to specific functions). When you access certain location-based services (such as the search, navigation, or weather query service), we will collect, use, and process your device's approximate or precise location information, which is obtained using GPS, GLONASS,GALILEO and BEIDOU, Wi-Fi hotspot, and service provider's network ID. You can revoke the corresponding permission from the system settings on your device to reject sharing your location information.

## 2. Why We Process Your Personal Data

We will process your personal data only for clear, explicit, and specific purposes. If personal data collected is not used for purposes directly or reasonably associated with the explicit purpose described in this Policy, we will ask for your consent separately.

Your personal data will be used for us to:

(1) Enter into a contract with you or provide you with products or services.

Help you register and activate your OSCAL products for personal and home use, and hand your queries and requests.

(2) Provide you with a better service experience, invite you to participate in online and offline activities, or collect your requirements for products.

Provide you with personalized user experience and content, and invite you to participate in promotional activities.

(3) Push related messages and important notifications to you.

Send you information about products and services that you may be interested in, and notifications about OS or application updates and installations.

(4) Protect the security of our products and services

Guarantee security, carry out and improve our loss prevention and anti-fraud plans.

(5) Act for other lawful and practical purposes with your consent.

## 3. How We Share, Transfer, or Disclose Your Personal Data

(1) We need to share your personal data with third-party service providers or our affiliates when using their services in certain scenarios, for example, when they are providing technical support for OSCAL products, contacting you on behalf of us, or handling your requirements. We will reasonably review the personal data protection capabilities of the data recipients and require them to take adequate organizational or technical measures to protect your privacy and personal data.

(2) We will transfer your personal data to a third party only with your explicit consent. In the event of acquisition, merger, reorganization, or bankruptcy involving personal data transfer, we will inform you of the changes and require the data recipients to be subject to this Policy.

(3) We may also disclose your personal data with your explicit consent or for legal or legitimate reasons, such as when required by the regulatory authority.

(4) We may also share, transfer, or disclose your data in other legally applicable scenarios or otherwise authorized by you.

## 4. How We Control Your Personal Data Independently or Jointly with Third Parties

When your personal data is under the control of us and third parties, we will work with the third party to determine the security requirements for personal data, as well as our respective responsibilities and obligations, and update you accordingly. For example, when you purchase products released by developers in OSCAL Store, we will share necessary information with developers to complete the transaction.

When your personal data is under the sole control of a third party, please carefully read its third-party privacy and personal data protection policies and determine whether to accept the services. For example, links in OSCAL products and services may redirect you to third-party websites, products, and services, which are provided for your convenience only. We cannot control the privacy and data protection policies of third parties who, therefore, are not subject to this Policy.

Your personal data may be shared with our affiliates in compliance with laws and regulations, and this Policy.

In addition, we will share your personal data with third parties to the extent permitted by law or with your consent.

5. How You Control Your Personal Data

(1) You reserve the right to access, correct, and delete your personal data in accordance with applicable laws. We will help you secure these rights through specific ways. To protect your privacy and personal data security, we will verify your identity and provide feedback to you to the extent permitted by law. We may reject unreasonable requests, such as repeated or unrealistic requests, or requests that may infringe upon others' rights or interests.

(2) You may at any time: Withdraw your consent. We will then stop collecting your personal data, but this will not affect the data processing before you withdraw your consent.

(3) You can delete your OSCAL ID linked with your OSCAL products and services at any time. After your OSCAL ID is deleted, we will stop providing related products and services. Your relevant personal data will be deleted or anonymized unless otherwise specified by laws.

## 6. How We Protect Your Personal Data

We take your personal data and privacy seriously, and are committed to protecting your privacy and personal data in accordance with established industry security standards. For this purpose, we take the following measures:

(1) We take all reasonable and feasible measures to ensure that the personal data collected is minimal and relevant to what is necessary in relation to the purposes for which they are processed. We will retain your personal data for the minimum period required to fulfill the purposes described in this Statement, unless the retention period is extended as necessary or permitted by law.

(2) We will use encryption technology to ensure the confidentiality of data transmission and storage. We will use a trusted protection mechanism to protect data and data storage servers against malicious attacks.

(3) We will deploy an access control mechanism to ensure that only authorized personnel can access personal data. In addition, we will control the number of authorized personnel according to the business needs and personnel levels, and manage their access permissions in a hierarchical way. All access to personal data is recorded in logs and periodically audited by the administrator.

(4) We strictly select business partners and service providers and incorporate personal data protection requirements into commercial contracts, audits, and appraisal activities.

(5) We will organize security and privacy protection training courses, tests, and publicity activities to enhance employees' awareness of the importance of protecting personal data.

In a word, we are highly committed to protecting your privacy and personal data. In spite of this, no security measures are completely infallible, and no products and services, websites, data transmission, computer systems, or network connections are absolutely secure.

If any personal data security incidents occur, we will notify you, pursuant to relevant legal and regulatory requirements, of the basic information about the security incident and its possible impact, measures that we have taken or will take, suggestions about active defense and risk mitigation, and remedial measures. The notification may take the form of an email, text message, push notification, etc. If it is difficult to notify data subjects one by one, we will take appropriate and effective measures to release a Security Notice. In addition, we will also report the handling status of personal data security incidents as required by supervisory authorities.

## 7. Protection of Minors

Minors refer to natural persons under the age of 18 unless under this Policy, unless otherwise stipulated by applicable laws. We will protect the privacy and personal data of minors in strict compliance with laws and established practices in the industry. We will only process minors' data by law and with the explicit consent from their legal guardians.

If you find that we are not processing the personal data of minors according to the above standards, please refer to the "Contact Us" section to notify us.

## 8. How We Manage Cookies and Similar Technologies

Our websites, mobile apps, online services, emails, and advertisements may use local storage technologies such as cookies, pixel tags, and website beacons.

(1) Cookies

A cookie is a text-only file stored on computers or mobile devices by network servers. The content of a cookie can only be retrieved or read by the server that created it. Each cookie is unique to your web browser or mobile application. Cookies usually contain identifiers, site names, and some numbers and characters.

Cookies are sometimes stored on computers or mobile devices to improve user experience, including:

(a) Login and verification: With cookies, you can be re-directed from one webpage to another without re-logging on each page, when you log in to our websites with OSCAL ID.

(b) Storing your preferences and settings: With cookies, our websites are able to save settings, such as the language, font size, and other browsing preferences, and items in your shopping cart on your computers or mobile devices.

(c) Interest-based advertising: With cookies, we are able to collect information about your online activities, discover your interests, and deliver to you the most relevant advertisements.

(d) Statistical Analysis: With cookies, we can collect information about your use of our websites and other apps, either for a single visit (using a session cookie) or for repeated visits (using a persistent cookie).

We will not use cookies for any purposes not stated in this statement. You can manage or delete cookies based on your preferences. You can clear all cookies stored on your computer, and most web browsers can be configured to block cookies.

However, if you do clear cookies, you will need to manually change your settings the next time you visit our websites. In addition, blocking cookies may affect your use of all or some features of certain services, which require the use of cookies to function properly.

(2) Web Beacons and Pixel Tags

In addition to cookies, we and some third parties may also use web beacons and pixel tags on websites. A web beacon is usually an electronic graphic image embedded into a website or email to identify your device cookies when you browse the website or email. Pixel tags allow us to send emails in a way that is readable to you and find out whether an email is opened.

We and some third parties use these technologies for various purposes, including analyzing service usage (together with cookies) and providing more satisfactory content and advertisements to you. For example, when you receive an email from OSCAL, it may contain a click-through URL which links to an OSCAL web page. If you click the URL, we will track your visit to understand your preferences for products and services and improve customer services. You can unsubscribe from our mailing list at any time if you do not want to be tracked in this manner.

(3) Other Local Storage

We and some third parties may apply other local storage technologies, for example, local shared object (also called "flash cookie") and HTML5 local storage, in certain products and services. Similar to cookies, these technologies store information in your device and can record some information about your activities and preferences. However, these technologies may use different media from cookies. Therefore, you may not be able to control them using standard browser tools and settings. For details about how to disable or delete information contained in Flash Cookies, click [here](https://www.adobe.com/products/flashplayer/end-of-life.html).

(4) Do Not Track

Many web browsers provide the Do Not Track feature which can send Do Not Track requests to websites. Currently, major Internet standardization organizations have not established policies to specify how websites should deal with these requests.

If you enable Do Not Track or other similar functions your browser may provide, we will not change the way we collect and use your data as described in this Statement. However, we reserve the right to respond to your Do Not Track request and stop the collection of your data without prior notice to you.

## 9. How We Store Your Personal Data

We will retain your personal data for no longer than is necessary for the purposes defined in this Statement, and delete or anonymize your personal data after the retention period expires.

Your personal data may be transferred outside of your country or region, as our products and services are provided by service providers worldwide. Although privacy and personal data protection laws and practices vary between countries/regions, we will take corresponding measures to provide the same level protection to your privacy and personal data, such as signing a data protection agreement with the data recipient.

## 10. Contact Us

We have a department (or specialists) dedicated to personal information protection. If you have any questions, comments, or suggestions regarding your personal information, please [contact us](https://www.oscal.hk/contact).

We will reply as soon as possible. If you think that our data processing has infringed upon your legal rights and interests, you have the right to file a complaint with or report to the corresponding regulatory authority.

11. How We Update this Policy

We will update or modify this Policy at our discretion. We will notify you of any changes that may affect your rights and interests under this Policy by posting our notice at a prominent position on the OSCAL official website or sending an email to you.