

Privacy Protection Agreement

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Introduction: **Timekettle** brand franchiser is Shenzhen Timekettle Technologies Co., Ltd. and its affiliates. A series of intelligent hardware products under such brand will provide users with translation, photo-taking translation, exchange rate inquiry and other services. **The Timekettle Privacy Policy (hereinafter referred to as the “Policy”) shall only be applicable to Timekettle’s products and services provided to you by Shenzhen Timekettle Technologies Co., Ltd. Prior to using this software, please carefully read the Policy to ensure that you have fully understood and accepted all terms set out herein. Otherwise, please do not register for, login in or use this software. Please carefully read and fully understand the Policy with your guardian if you are a minor under the age of 18, and shall not use Timekettle's products and services without consent of your guardian.**

The Policy will help you understand the following contents:

- 1. Definitions and interpretations**
- 2. How do we collect and use your personal data**

3. How do we share, transfer and publicly disclose your personal data

4. How do we protect and preserve your personal data

5. How do you manage your personal data

6. Protection of personal information of minors

7. Notice and amendments

8. How to contact us

I. Definitions and interpretations

1. Translation services shall refer to the translation, photo-taking translation and other services provided to users (hereinafter referred to as the "services") by Shenzhen Timekettle Technologies Co., Ltd., the franchiser of Timekettle brand.

2. Shenzhen Timekettle Technologies Co., Ltd. shall refer to **Timekettle** brand franchiser, a high-tech company which is mainly engaged in artificial intelligence, software and hardware services, and solution of language communication. If you would like to know more about our company and platform in details, you may contact us through the contact methods provided under Article 9 hereof.

4. Users shall refer to those who have registered for, logged in and used the software and enabled, browsed or uploaded data to Timekettle. Users are commonly referred to as "you" herein.

5. Sensitive person information shall refer to the personal data that, once divulged, illegally provided or misused, may endanger personal or

property safety, or easily result in damage to personal reputation or physical and mental health, or discriminatory treatment. Sensitive personal information shall include but not be limited to ID numbers, personal biometric information, bank accounts, communication contents, and physiological health information.

6. Personal data subjects shall refer to the natural persons identified by personal data.

7. De-identification shall refer to the technical process over the personal data by which personal data subjects cannot be identified without reference to extra information.

8. Anonymization shall refer to the technical process over the personal data by which personal data subjects cannot be identified, and the processed information cannot be restored.

9. Unique device identifier (Unique ID or UUID) shall refer to the a string of characters encoded into devices by manufacturers which can be used to identify devices accordingly with their unique identifiers. We may identify devices or applications with device boot time, system version, device model, physical storage, hardware capacity, system update time, operator, timezone, country, language, IP address, OAID and other information.

10. IP address shall refer to a number designated to each device connected with the Internet, namely the Internet protocol (IP) address.

Such numbers are often designated based on geographic location. An IP address can be often used to identify the location of the device connecting with the Internet.

12.SSL, also known as Secure Socket Layer, is a security protocol realized on TCP/IP. SSL supports various kinds of network, while providing three fundamental security services that maintain information as confidential using public and symmetric keys.

13. Information collection technology: Automatic collection by Timekettle described herein shall include those as follows:

(1) Cookies shall refer to a tiny text file stored in client (your computer, mobile phone or other smart devices) by the network server when you browse a website. Cookies are used to improve your using experience.

(2) Log files shall refer to certain data automatically collected in log files. Such data shall include IP address, browser type, Internet service providers (ISP), reference exit page, operating system, timestamps and click stream and other data.

(3) ET Tag shall refer to the HTTP protocol headers communicated between Internet browsers and Internet servers. As an alternative to cookies, ET Tag can be used to track individual users, and enable us to further understand and improve our services.

14. The laws, regulations and administrative rules governing the Policy shall be those of the People's Republic of China.

2. How do we collect and use your personal data

You shall understand and agree that:

- 1. The personal data we have collected shall be used in accordance herewith and for the purpose of delivering our products and/or service functions.**
- 2. Your personal data collected shall be subject to de-identification process, which will not be used to identify the data subject. You shall understand and agree that under such circumstance, and we shall have the right to use any de-identified information, and to analyze and commercially use the user database; provided, however, that your personal data may not be disclosed.**
- 3. Please note that all personal data provided when you use our products and/or services shall be authorized for our use during the period when you use our products and/or services, unless you delete such data or refuse our collection through system settings.**
- 4. Use of our products and/or services will be subject to statistical collection, after which such statistics may be shared with the public or third parties to present the overall use trends in our products and/or services. However, such statistics shall not include any of your identity information.**
- 5. When your personal data is presented, content substitution, anonymous treatment and other measures will be adopted to**

desensitize your information, in order safeguard your information

6. When your personal data will be used for the any other purposes not specified herein, or the information is collected for specific purposes, we may seek your prior consent in the form of checking.

When you use our products and/or services, we may need to collect and use your personal data, including for the following purposes:

1. To realize the basic functions of our products and/or services, you have to authorize us to collect and use any necessary information. You will not be able to use our products and/or services provided you refuse to provide such information.

2. To implement the additional functions of the products and/or services we have provided to you, you may opt to authorize us to collect and use the information. You will not be able to use such additional functions or the intended function may not be implemented, provided you refuse to provide such information. However, it will not affect your normal use of the basic functions of our products and/or services.

Timekettle will only collect and use your personal data for the purposes described herein, including:

1. Product terminal identifiers and communication identifiers

2. Text, audio and images to be translated
3. Use time of product clients
4. Location data
5. Information on WiFi connection and mobile communication base station
6. System default language which is used to offer you various functions in your default language and default translation language.

The services above may require you to authorize us to access your unique device identification number, geographic location (location data), location (general access location), microphone and phone storage, in order for us to collect and use the information in connection with these functions.

Please note that, by enabling these accesses, you authorize us to collect and use such personal data to implement the functions above. And by disabling such accesses, you withdraw the authorization. Subsequently, we will no longer collect and use the personal data about you, or provide functions in connection with the said authorization. Your decision on disabling accesses will not affect the process of personal data you have authorized previously.

Please note in accordance with the relevant laws and regulations, Timekettle shall not be required to seek your authorization and consent to

collect and use your personal data under the following circumstances which is:

1. directly related to national security and national defense security;
2. directly related to public safety, public health and major public interests;
3. directly related to criminal investigation, prosecution, trial and execution of judgments, etc.;
4. for the protection of your or other personal life, property and other major legitimate rights and interests, but it is difficult to obtain personal consent;
5. the collected personal data disclosed to the public by yourself;
6. the personal data collected from legally disclosed information, such as legitimate news report, governmental information disclosure and other channels;
7. necessary to maintain the safe and stable operation of the products or services provided, such as discovering and handling the failures of the products or services; and
8. related to the fulfillment of Timekettle's obligations under laws and regulations.

Please note where we process any personal data with technical measures and other necessary measures pursuant to applicable laws

for the purpose of making it impossible for recipients to identify specific individuals or restore such data, or we may study the information collected after de-identification, analyze it for statistics and improve contents and layout of Timekettle, so as to provide product or service support to business decisions and improve our products and services (including for machine learning or model algorithm trainings using the anonymous data), we shall not be required to inform you of the use of such processed data, and obtain your consent.

3. How do we share, transfer and publicly disclose your personal data

(I) Sharing

1. We will not share your personal data with any companies, organizations or individuals other than Timekettle and its partners, except under the following circumstances that:

- (1) we have obtained your express consent or authorization in advance;
- (2) we are required by applicable laws and regulations, legal procedures and mandatory administrative or judicial requirements to provide such personal data;
- (3) to the extent permitted by laws and regulations, we are required to provide such personal data to protect "Timekettle" or partners of "Timekettle", you or other users of Timekettle, or social public interests,

properties or safety from damage;

(4) we can provide the core functions of our products or services, or the services you required only if you share your information with us;

(5) we help solve the dispute or controversy between you and others based on your request;

(6) we comply with the agreements executed by you (including electronic agreements executed online and the related provisions) and or the provisions of other laws;

(7) such personal data will be used based on academic research;

(8) such personal data will be used for the social and public interests in compliance with laws and regulations.

2. We may share your personal data with our affiliates on "need to know" basis, and such sharing shall be subject to the purposes contained herein.

Where our affiliates intend to change the purpose of processing personal data, we shall obtain your prior authorization and consent.

3. We may share the information in connection with your orders, accounts, devices and location with partners and other third parties to guarantee successful delivery of our services. However, we shall only do so for legitimate, justified, necessary, specific and express purposes, and only the personal data for the required services will be provided. Our partners shall not have the right to use the personal data for any other purposes.

Our partners shall include the followings:

Goods or technology service providers. We may share your personal data with the third parties that support our functions. Such supports shall include the provision of infrastructure technology services, translation and recognition services, payment services, data processing, etc. We share the information in order to implement the core shopping functions of our products and/or services. For instance, we may need to share your order number and order amount with third-party payment institutions to confirm your payment instruction and complete payment. We will strictly monitor the security of the software development kits (SDKs) and the application programming interfaces (APIs) to ensure data security.

4. To comply with laws, execution or use conditions and other agreements applicable to us; or to protect the rights and property or safety of Timekettle, you or other Timekettle users (e.g. prevent fraud and other illegal activities and mitigate credit risk), we may exchange information with other companies and entities. However, we shall not sell, lease, share or otherwise disclose any personal data for profits in violation of the undertakings made hereunder.

(II) Transfer

We will not transfer your personal data to any company, entity, or individual, except for the following circumstances that:

1. we have obtained your express consent or authorization in advance;
2. we are required by applicable laws and regulations, legal procedures

and mandatory administrative or judicial requirements to provide such personal data;

3. we comply with the agreements executed by you (including electronic agreements executed online and the platform rules) or the provisions of other laws;

4. in case of a merger, acquisition, or liquidation involving the transfer of personal data, we will require the new company or organization holding your personal data to continue to be bound by this Privacy Policy, otherwise we will require that company or organization to seek your authorization and consent again.

(III) Public disclosure

We will only publicly disclose your personal data, provided that:

1. we disclose the specified personal data as required by you via the disclosure means expressly agreed upon by you;

2. under the circumstance that we are required by laws and regulations, mandatory administrative enforcement or judicial requirements to provide your personal data, we may publicly disclose your personal data by type and disclosure method. Under the premises of compliance with laws and regulations, when we receive a request on the disclosure of such information, we shall require the presentation of the related legal documents, such as subpoena or investigation letter. We believe that the information we are required to provide shall be maintain as transparent as

much as possible within the extent permitted by laws. We shall conduct prudential review over all requests to ensure that there is legitimate basis in place, and the disclosure shall be limited to the data that can be obtained by law enforcement for specific investigation purpose. Under the extent permitted by laws and regulations, the documents we disclosed shall be protected with encryption keys.

(IV) Exceptions

We do not need to obtain your authorization or consent in advance to share, transfer and publicly disclose your personal data under the following circumstances that is:

1. related to national security and national defense security;
2. related to public safety, public health and major public interests;
3. related to criminal investigation, prosecution, trial and execution of judgments, and other judicial or administrative enforcement actions;
4. for the protection of your or other personal life, property and other major legitimate rights and interests, but it is difficult to obtain personal consent;
5. the personal data you have publicly disclosed.
6. the personal data collected from legally disclosed information, such as legitimate news report, governmental information disclosure and other channels.

Please note in accordance with applicable laws, where we will adopt technical measures and other necessary measures to process any personal data so that data recipients will not be able to identify any specific individuals and restore such data, we will not be required to inform you of further sharing, transfer and public disclosure of such processed data, and obtain your consent.

IV. How do we protect and preserve your personal data

(I) Protection of your personal data

1. We have adopted security and protection measures in line with industrial standards to protect the personal data you have provided, prevent data from unauthorized access, public disclosure, use, modification, damage or loss of the data. We will take all reasonable and feasible measures to safeguard your personal data. For instance, we use https-based encryption technique to transmit your personal data, with which data exchanged between your browser and "services" shall be protected by SSL encryption. We will use encryption technology to ensure the confidentiality of data, and trustworthy protection mechanism to prevent data from malicious attack. We will also deploy access control mechanism to guarantee that only the authorized staff may access personal data.

2. To reasonable extent, we will use all kinds of security protection measures to ensure information security. For instance, we will use

encryption techniques (e.g. TLS, SSL) and anonymization to safeguard your personal data. To prevent virus, trojan horse programs, or other malicious programs and websites, we may scan the applications installed on your device, running processes or information registered in the device memory, to check if there is any security threat; to prevent fraud, embezzlement, phishing and other illegal acts, and conduct security check, we may analyze the unique device identifier, login IP address, operation logs and other data, so as to adopt security measures or provide security alert to users.

3. We shall develop specific management policies, procedures and organizations to ensure information security. For example, we strictly limit the range of people who have access to information, and require them to abide by confidentiality obligations and conduct vetting.

4. We shall adopt all reasonable and feasible measures to avoid collecting irrelevant personal data. We only keep your personal information within the time period as necessary to realize the purpose stated in this Policy, except that an extension of the retention period is required or permitted by law.

5. Upon the unfortunate occurrence of personal data security incident, we will, as per the requirements of laws and regulations, inform you of: the fundamentals and possible impacts of the security incident, measures taken or to be taken, suggestions for self protection and risk mitigation,

remedies offered to you, etc. We will inform you of the related facts of the incidents on timely basis via emails, letters, calls and push notices. Where it is impractical to inform data subjects on individual basis, we will adopt reasonable and effective methods to make announcements. At the same time, we will proactively submit the information of handling individual data security incident based on the requirements of regulators.

(II) Storage of your personal data

1. In the case of termination of our services or operation, we shall provide a prior notice to you, and shall delete or anonymize your personal data upon termination of services or operation.
2. We shall store your personal data within the period required by laws and regulations, or the shortest period necessary to cater for Timekettle's products and/or services.

5. How do you manage your personal data

(I) Access to your personal information

You have the right to inquire about your information, and examine such information independently based on the followings:

1. Enable "Translation History" function to check the record of all translation services you used;
2. Scroll up to check translation history on the translation function interface;

(II) Deletion of your personal data

You may request us to delete your personal data under the following circumstances:

1. Our act of personal data processing violates laws and regulations;
2. We collect and use your personal data without your prior consent;
1. Our act of personal data processing violates our agreements with you;
4. You no longer use our products or services;
5. We no longer provide products or services to you.

6. Protection of personal information of minors

1. We attach material importance to the protection of the information of minors. If you are a minor under the age of 18, you shall obtain consent from your parents or legal guardian prior to using our products or services. We will protect the personal information of minors in accordance with the related laws and regulations of the state.

2. In the case of collecting individual information of minors with the consent of parents and the legal guardian, we will only make use of or publicly disclose such information to the extent permitted by law, explicitly agreed by parents and the legal guardian or deemed necessary for the protection of minors.

6.3 If we find that we have collected personal information from a minor without obtaining the prior verifiable consent from a parent or legal

guardian, we will do what one can to delete the data as soon as possible.

7. Notice and amendments

Our privacy policy may be subject to change. Without your express consent, we will not reduce the rights that you enjoy according to the Privacy Policy.

For any material change to the privacy policy, we will also present notices on evident places (e.g. when the software is going to be revised or upgraded, or you re-log in, a timely pop-up notice will be displayed).

9.4. Material changes referred to herein shall include but not limited to:

1. Our service pattern is changed significantly, e.g. purpose of processing personal information, type of personal information processed, and use thereof;
2. Our control is subject to material change, e.g. change in ownership arising from M&As and restructuring;
3. Primary recipients of sharing, transfer, or public disclosure in terms of personal information are to be changed;
4. Material changes are made to your rights to participate in the processing of personal information, and in the manner in which it takes place.
5. 7.5 Changes are made to our departments responsible for handling the security of personal information, in contact information, and in complaint

channels;

6. An impact assessment report on personal information security indicates there is a high risk.

VIII. How to contact us

If you have any comment or question on the Policy, or any question on our collection and use of your personal information, you may contact us in the following ways:

Address: Room 612, Block 4, Pingshan Private Enterprise Science and Technology Park, No.65 Lishan Road, Pingshan Community, Taoyuan Subdistrict, Nanshan District, Shenzhen, Guangdong, the Republic of China

Tel: (+86) 0755-86725036

Email: support@timekettle.co

The translation above shall be for reference only. In case of any inconsistency with the Chinese version, the Chinese version shall prevail.