

Privacy Policy

At 101 Securities, we take privacy and security seriously. Hence, we will take corresponding security protection measures in accordance with the requirements of laws and regulations to try our best to protect your personal data in a safe and controllable manner. In view of this, 101 Securities (collectively, the "Company", "101", "101 Securities", "we", "our", or "us") has formulated a "Privacy Policy" (hereinafter referred to as "this policy") and reminds you:

This policy applies to your use of 101 Securities' products and services in any way. Before using our products or services, please be sure to read and thoroughly understand this policy, and use the relevant products or services after confirming your full understanding and consent. Once you start using our products or services, it means that you have fully understood and agreed to this policy. If the products or services provided by 101 Securities are used in the products or services of our related companies, but there is no independent privacy policy, this policy also applies to that part of the products or services.

If you have any questions, comments, or suggestions on the content of this policy, you can contact us by email at 101financial.customer@gmail.com. Generally, after receiving your relevant contact information and verifying your identity, we will reply within 15 working days.

We are committed to maintaining your trust in us and abide by the following principles to protect your personal data: the principle of consistent rights and responsibilities, the principle of clear purpose, the principle of choice and consent, the principle of least sufficient, the principle of ensuring security, the principle of subject participation, the principle of openness and transparency.

1. How we collect your personal information

1. In order to provide you with services, maintain the normal operation of 101 securities products and services, improve and optimize our service experience and protect your account security, we will collect your registration, use of products and services for the following purposes and methods of this policy. Information provided on the initiative, authorized to provide, or based on your request, and based on information generated when you use our services:

- (1) When you use your mobile phone number and verification code to register for 101 Securities, we will collect your mobile phone number. Mobile phone numbers are sensitive information, and this type of information is collected to meet the network real-name system requirements of relevant laws and regulations.
- (2) When you log in to 101 Securities using a third-party account such as Google, Facebook, Line, etc., we will obtain the avatar and nickname of the third-party account you used when logging in through the third-party authorization service, and save this information in 101 Securities Access Server. This information will be used to manage your 101 login account. Unless you choose or comply with relevant laws and

regulations, we will not provide the above information to outsiders and will not use it for other purposes except this function.

- (3) When you use 101 Securities' personal avatar editing function, upload photos, and live broadcast functions, if you choose to use the "Take a Photo" or "Video" method, 101 Securities will use the device's camera permission; if you use the "Select from Album" method, 101 Securities will use the device's photo permissions. The photos and videos you upload will be stored on our server because this function needs to be completed through storage.
- (4) When you use the live broadcast function of our platform, when you are conducting a live training broadcast, or when you initiate a live broadcast as a host, we will use the microphone permission of the device. The voice data you upload will be stored on our server because this function needs to be completed through storage.
- (5) When you use the reminder or important event notice function of the 101 Securities Quotation System, we will use the calendar permissions of the device so that you can obtain relevant information in time. If you deny access, you will not be able to use the reminder function, but it will not affect your use of 101 Securities' other services.
- (6) In order to ensure that you can normally receive and use the relevant quotation rights and services, we will use the 101 account ID, IP address, third-party account and avatar, nickname, etc. provided by you to identify the validity of the account or your geographical location. If you disagree with the above content, it may affect the validity of the region or account, and then affect your receipt and use of the relevant quotation rights and services.
- (7) According to the requirements of securities companies and relevant securities laws, when you apply for deposit and withdrawal through 101 Securities, you must submit the front and back photos of your ID card, bank payment information and other information. If you do not agree with the above content, you will not be able to use the deposit and withdrawal functions, but it will not affect your use of other services of 101 Securities.
- (8) When you use 101 Securities, in order to ensure your normal use of our services and to provide you with page display and suggest personalized content that is more in line with your needs, perform user portraits, understand product suitability, identify abnormal account status, and to improve and optimize our service experience and protect the security of your account, we will collect data about the services you use and how you use them and associate this information. These data include:
 - (i) Log Information: We collect log information about your use of the Services, including the type of browser you use, app version, access times, search query content, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services.
 - (ii) Device information: We will receive and record the device-related information (such as IMEI, MAC, Serial, SIM card IMSI identification code, device model, operating system, and version) according to the specific permissions granted by you during software installation and use, Client version, device resolution, package name, device settings, unique device identifiers, software and hardware characteristics information), device location-related information (such as IP address, GPS location, and WLAN access points that can provide relevant information, Bluetooth and base station sensor data)

2. In addition, in accordance with relevant laws, regulations, and national standards, in the following situations, we may collect and use your personal data without asking for your authorization:

- 1) It is directly related to national security, national defense security, and other national interests;
- 2) It is directly related to major public interests such as public safety, public health, and public knowledge;
- 3) Directly related to a criminal investigation, prosecution, trial, and execution of judgments;
- 4) In order to protect your or other individuals' life, property, reputation, and other major legal rights and interests, but it is difficult to obtain the consent of the person;
- 5) The personal information collected is disclosed to the public by yourself;
- 6) Collecting personal data from legally publicly disclosed data, such as legal news reports, open government information, and other channels;
- 7) Necessary for signing and performing the contract according to your requirements;
- 8) Necessary for maintaining the safe and stable operation of the products or services provided, such as detecting and disposing of product or service failures;
- 9) Necessary for the development of legal news reports;
- 10) When it is necessary to carry out statistical or academic research in the public interest, and when it provides the results of academic research or description to the outside, the personal data contained in the results are de-identified;
- 11) Other circumstances stipulated by laws and regulations.

3. Please understand that the functions and services we provide to you are constantly updated and developing. If a function or service is not included in the foregoing description and your information is collected, we will use page prompts, interactive processes, website announcements, etc. to explain to you the content, scope, and purpose of data collection.

4. We may obtain relevant information that you have authorized to share from related parties and third-party partners. We will collect and use your information on the premise that it complies with relevant laws and regulations, and in accordance with the agreement with the affiliate or third-party partner, and we are confident that the source of the information provided by it is legal.

5. The above information provided by you may include your personal sensitive information, such as bank account numbers, transaction records, virtual property information, system account numbers, email addresses, and related passwords, phone numbers, web browsing records, and location information. Please be cautious and pay attention to your sensitive personal information. You agree that we can process your sensitive personal information in accordance with the purposes and methods described in this privacy policy.

2. How we will use the collected data

Based on the provisions of relevant national laws and regulations, as well as the purpose of providing services and improving service quality, and providing you with a safe, smooth,

efficient, and personalized experience, we will strictly abide by the provisions of laws and regulations, this privacy policy, and under the premise of other agreements with you. The collected data will be used for the following purposes:

- (1) Provide you with various related services
- (2) Let us understand how you access and use related services to meet your individual needs
- (3) Development and service optimization. For example, when our system fails, we will record and analyze the data generated when the system fails to optimize our services.
- (4) Send you promotional materials to promote 101 services or third-party goods and services, suggest materials and information you are interested in, and send you notifications related to 101 services
- (5) Evaluate and improve our promotion effect, etc.
- (6) Software management. For example, software certification, software upgrades, etc.
- (7) Your participation in surveys about our services
- (8) Prevent, detect, and investigate fraud, infringement, endangering safety, illegal or violation of agreements, policies, or rules with us or our affiliated companies, and protect the legitimate rights and interests of you, other users, or the public, and ours or our affiliates. We will use or integrate your personal data, service usage data, equipment data, log data, and data that our affiliates and partners have obtained your authorization or shared in accordance with the law to comprehensively determine your account and transaction risks, perform identity verification, detection and prevention Security incidents, and necessary recording, review, analysis, and disposal measures shall be taken in accordance with the law
- (9) In order to ensure the security of the service and help us better understand the delivery status of our apps, we may record relevant information, such as the frequency of your use of the app, crash data, overall usage, performance data, and the source of the app. But we will not combine the data we store in the analysis software with the personally identifiable information you provide in the app
- (10) Other purposes authorized by you.

If we use your personal data beyond the stated purpose at the time of collection and the scope of direct or reasonable connection, we will notify you again and obtain your express consent before using your personal data

3. How we will use Cookie and other similar technologies

1. Cookie

In order to make your access experience easier, when you use 101 Securities' products or services, we may collect and store data related to your access to our services through the use of various technologies. When you visit or revisit 101 Securities services, we can identify your identity and provide you with better and more services by analyzing data, including the use of small data files to identify your identity. This is to understand your habits and save you the step of repeating the input of account information or to help determine the security of your

account. These data files may be cookies, Flash cookies, or other local storage provided by your browser or associated applications (collectively referred to as "cookies"). We will not use cookies for any purpose other than those described in this policy. You can manage or delete cookies according to your preferences. For details, see AboutCookies.org. You can clear all cookies saved on your computer, and most web browsers have a feature to block cookies. But if you do this, in some cases you may not be able to use some of the functions of the 101 Securities service that rely on cookies, and you need to personally change the user settings every time you visit our website.

2. Web beacons and pixel tags

In addition to cookies, we may also use other similar technologies such as web beacons and pixel tags on our website. For example, the email we send you may contain a click-through URL that links to the content of our website. If you click the link, we will track the click to help us understand your product or service preferences and improve customer service. A web beacon is usually a transparent image embedded in a website or email. With the help of the pixel tags in the email, we can know whether the email has been opened.

3. Do Not Track

Many web browsers have a Do Not Track function, which can post Do Not Track requests to websites. Currently, major Internet standards organizations have not yet established relevant policies to regulate how websites should respond to such requests. But if Do Not Track is enabled in your browser, then we will respect your choice.

4. How we share, transfer, and publicly disclose your personal information

1. Sharing of Information

We will not share the personal information we hold about you except in the following circumstances:

- (1) Sharing with your consent: After obtaining your explicit consent, we will share your personal information with other parties
- (2) Sharing under statutory circumstances: We may share your personal information externally in accordance with laws and regulations, the need for litigation dispute resolution, or the requirements of administrative or judicial authorities in accordance with the law.
- (3) Only disclose your information (such as your IDFA, network identity identifier, IP address, IMEI, MAC address, etc.) in order to provide the third-party products and services you request, or to use 101 Securities for data analysis or research, to improve our products and services. The third-party SDK services we currently access mainly include the following types:
 - Provide IM message communication function;
 - Provide free data flow service;
 - Carry out user behavior data reporting and analysis;
 - Provide payment services;
 - Reporting program crash data;
 - Perform performance statistics;

- Provide live broadcast support function;
- Provide browser services;
- For advertising statistics and monitoring;
- Used for third-party account login;
- To facilitate you to share 101 securities content to third-party platforms;

Such access to third-party services are operated by related parties and are subject to the third party's own terms of service and data protection statement (not this "Privacy Policy").

- (4) If you are complained by others or you complain to others, we will provide your identity information and other relevant materials to the relevant supervisory authority for the purpose of resolving complaints and disputes, unless it is expressly prohibited by laws and regulations.
- (5) Exchange data with other companies and organizations in order to comply with the law, to implement or apply the terms of use of our services and other agreements, or to prevent fraud and other illegal activities and reduce credit risks.
- (6) Sharing with our affiliated companies: Your personal information may be shared with the affiliated companies of AT Capital Group. We will only share necessary personal data and are bound by the stated purpose in this privacy policy. If the affiliated company wants to change the purpose of processing personal data, it will again seek your authorization and consent.
- (7) Sharing with authorized partners: only to achieve the purpose stated in this policy, some of our services will be provided by authorized partners. We may share some of your personal information with our partners to provide better customer service and user experience. For example, when you participate in the reward activities provided by us, we must share your personal information with our partners to arrange for rewards or to arrange for partners to provide services. We will only share your personal data for legal, legitimate, necessary, specific, and clear purposes, and will only share personal data necessary to provide services. Our partners have no right to use the shared personal data for any other purpose.
- (8) In accordance with the relevant agreement between this software "Service Agreement" and you, it will be shared with a third party.
- (9) Other agreements between you and us regarding data sharing.

For companies, organizations, and individuals with whom we share personal data, we will sign strict confidentiality agreements with them, requiring them to process personal data in accordance with our instructions, this privacy policy, and any other relevant confidentiality and security measures.

2. Transfer of Information

We will not actively transfer your personal data except for the following circumstances:

- (1) The relevant operation has obtained your express consent in advance;
- (2) When it involves a merger, acquisition, or bankruptcy liquidation, if it involves the transfer of personal data, we will require the new company or organization that holds your personal data to continue to be bound by this privacy policy, otherwise, we will require the company, The organization re-seeks authorization and consent from you;

- (3) Others that need to transfer your personal data in accordance with the provisions of laws and regulations and the requirements of the competent authority.

3. Public Disclosure

We will only publicly disclose your personal information under the following circumstances

- (1) After obtaining your explicit consent;
- (2) Public disclosure based on the law: We may publicly disclose your personal information in the case of laws, legal procedures, litigation, or mandatory requirements of government authorities;
- (3) If we determine that you have violated laws and regulations or seriously violated 101 Securities-related agreement rules, or to protect the personal and property safety of 101 Securities and its affiliated company users or the public from infringement, we may follow laws and regulations or 101 Securities Disclosure of your personal information, including relevant violations and the measures that 101 Securities has taken against you, with your consent in the relevant agreement rules.

4. Exceptions for obtaining prior authorization and consent when sharing, transferring, and publicly disclosing personal data

- (1) Related to national security and national defense security;
- (2) Related to public safety, public health, and major public interests;
- (3) Related to criminal investigations, prosecution, trial, and execution of judgments;
- (4) In order to protect your or other individuals' life, property, and other major legal rights and interests, but it is difficult to obtain the consent of the person;
- (5) Your personal information disclosed to the public on your own;
- (6) Collecting personal information from legally publicly disclosed information, such as legal news reports, government information disclosure, and other channels.
- (7) Please note that in accordance with the law, sharing and transferring anonymized personal data, and ensuring that the data recipient cannot recover and re-identify the subject of the personal data, does not belong to the external sharing, transfer and public disclosure of personal data behaviors, the storage, and processing of such data will not be required to notify you and obtain your consent.

5. How do we protect your personal data

We will take various precautions to protect your personal data from loss, embezzlement, and misuse, as well as unauthorized access, disclosure, alteration, or destruction. To ensure the security of your personal data, we have strict data security regulations and procedures, and a dedicated data security team strictly implements the above measures within the company.

We will take all reasonable and feasible measures to ensure that irrelevant personal information is not collected. We will only retain your personal data for the period required to

achieve the purpose stated in the policy unless it is necessary to extend the retention period or is permitted by law.

The Internet is not an absolutely secure environment, and email, instant messaging, and communication with other 101 Securities users are not encrypted. We strongly recommend that you do not send personal data through such methods.

We will establish emergency response plans. If security incidents such as personal data leakage occur, we will activate emergency plans to prevent the expansion of security incidents. We will promptly inform you of the relevant information of the incident by email, letter, telephone, sending notices, etc. If it is difficult to inform the subject of personal data one by one, we will adopt a reasonable and effective way to issue an announcement. The Internet environment is not 100% secure. Although we have these security measures, please note that there are no "perfect security measures" on the Internet. We will try our best to ensure the security of your data.

6. How do we store information

Generally speaking, we will only keep your personal data for the shortest time necessary to achieve the purpose. However, in the following cases, we may change the storage time of personal data due to compliance with legal requirements:

- (1) To comply with applicable laws and regulations and other relevant provisions;
- (2) To comply with court judgments, rulings, or other legal procedures;
- (3) To comply with the requirements of relevant government agencies or legally authorized organizations;
- (4) Purposes reasonably necessary to implement relevant service agreements or this policy, safeguard the public interest, and protect the personal and property safety of our customers, us or our affiliates, other users or employees, or other legitimate rights and interests.

7. Your right to manage your own data

1. During your use of 101 Securities' services, in order for you to access, correct, and delete your personal data more conveniently while protecting your right to withdraw your consent to the use of personal data and cancel your account, we design the product for you and provide operating settings including but not limited to the following:

- (1) Access your account information. If you wish to access or edit the personal information in your account, change your password, add security information, etc., you can perform such operations by visiting 101 Securities - [Account]. You also can access or view your search history in the search box of 101 Securities;
- (2) To modify personal information, you can perform such operations by visiting 101 Securities-[Account]

2. If you find that our collection and use of your personal data violates laws, administrative regulations, or breaches of agreements with you, you can contact us via e-mail and request to delete your personal data collected under the violation.

3. If you find that your personal data collected and stored by us is wrong, you can contact us via e-mail and ask us to correct it in time.

8. How do we protect the data of minors

We attach great importance to protecting the personal data of minors. According to relevant laws and regulations, if you are a minor under the age of 18, it is recommended that your parents or guardians read this policy carefully and submit your personal data after obtaining the consent of your parents or guardians. At the same time, it is recommended that you use our services under the guidance of your parents or guardians. Otherwise, you must immediately terminate the submission of information or terminate the use of our services, and notify us of this situation as soon as possible so that we can take effective measures. At the same time, we will only use or disclose the information of minors when permitted by laws and regulations, with the explicit consent of parents or guardians, or necessary to protect your rights and interests. If you are the parent or guardian of a minor, if you have any questions about the personal data of the minor under your guardianship, please contact us through the first page of this privacy policy.

9. How to transfer your personal data globally

Since we provide products or services through resources and servers all over the world, this means that after obtaining your authorization and consent, your personal data may be transferred to the overseas jurisdiction of the country/region where you use the product or service, or receive visits from these jurisdictions. Such jurisdictions may have different data protection laws or even no relevant laws. In such cases, we will ensure that your personal data is adequately and equally protected. For example, we will request your consent for the cross-border transfer of personal data, or implement security measures such as data de-identification before cross-border data transfer.

10. Information we may send to you

1. When you use our services, we may send you emails, text messages, information or push notifications. You can follow our relevant tips and choose to unsubscribe on your device.
2. We may issue service-related announcements to you when necessary (for example, when a certain service is suspended due to system maintenance). You may not be able to cancel these service-related announcements that are not advertisements in nature.

11. How to update this policy

We will promptly update this privacy policy in accordance with the requirements of relevant laws and regulations, business changes, or other necessary circumstances. Without your explicit consent, we will not reduce your rights in accordance with this privacy policy. The changes made to this policy are posted on this page, and the revised policy is notified through

the official website or other ways that you may be appropriate to receive notifications. In this case, if you continue to use our services, you agree to be bound by the revised and updated policy.

12. The scope of application of this policy

1. This policy applies to all services provided by all AT Capital Group companies that you use, except for the services that we clearly stated that we need to apply other separate privacy policies or terms specially formulated by us. However, some services have set their specific privacy guidelines/statements as needed. If this policy is inconsistent with the privacy guidelines/statements of specific services, please refer to the specific privacy guidelines/statements.

2. The headings of all clauses of this policy are for reading convenience only, they have no actual meaning and cannot be used as the basis for the interpretation of the meaning of this policy.