

ROCKFLOW Privacy policy

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

Disclaimer

FLOW AI PTE. LTD. (the "ROCKFLOW", "Company", "we" or "us") is committed to provide clients with the excellent securities services. Based on the service needs, we shall collect and use client's personal data. We understand that clients are extremely concerned about the use and confidentiality of their personal data ("information" or "data"). The Company always handle seriously about the security and privacy of client data. Therefore, we have established the following policies and committed to protect the privacy, confidentiality and security of client data by complying with the requirements for personal data protection in various jurisdiction, especially the New Zealand Privacy Act, 2020. Please note that this Privacy Policy may be amended from time to time without prior notice. You are advised that you need to check the latest version on our websites on a regular basis.

I. How we collect and use your personal information

1. When you use our products and/or services, your personal information may be collected and used in the following two situations:

(1) In order to provide you with the basic functions of our products and/or services, you must authorize us to collect and use necessary information. If you refuse to provide the corresponding information, you will not be able to use our products and/or services normally;

(2) In order to provide you with additional functions of our products and/or services, you must authorize us to collect and use information. If you refuse to provide, you will not be able to use the relevant additional functions or achieve the functional effects we intend to achieve, but it will not affect your normal use of the basic functions of our products and/or services.

The functions and services we provide to you are constantly updated and developed. If a function or service is not in the following description and collects your information, we will explain to you separately through page prompts, interactive processes, website announcements, etc. The content, scope and purpose of information collection.

2. Information you provide when using our services includes:

(1) Perform anti-money laundering obligations and implement real-name management in accordance with laws, regulations and regulatory requirements.

When you apply for an account, you need to provide your identity information in accordance with laws, regulations and regulatory requirements, including name, nationality/legal country of residence, type/quantity of valid identity certificates, mobile phone number, email address, residential address information, tax identification Number, date of birth, personal signature style, face recognition information, country of birth, tax jurisdiction country; when the usual residence address is different from the address of the ID card, you need to provide a separate address certification file (such as public utility bill/driver with address information) Certificate/Proof of Property Rights/Household Register, etc.).

During the account opening process, when you perform face recognition and identity authentication, you may need to turn on the device's camera, camera and photo album (photo

library) permission. We will collect your facial features and valid identity documents, and strictly check your Use them within the scope of authorized use to protect your account and transaction security. If you do not want to provide the above information or refuse to open the above permission, you may not be able to complete the account opening process normally and you will not be able to use the corresponding services and functions provided by us.

(2) Conduct "Know Your Customer (KYC)" evaluation, customer rating and risk level evaluation in accordance with laws, regulations and regulatory provisions

In accordance with laws, regulations and regulatory requirements, when you open an account, we need to judge and rate the suitability of your investment, and provide you with a risk level assessment. For this we need you to provide professional status and asset information (net current asset range, Scope of net assets, scope of total assets, scope of net annual income), investment objectives and investment experience information (transaction period and frequency of different varieties, investment preferences). When your occupation status is employed or starting a business, you need to add detailed occupational information, including the name of the unit, the area and detailed address, the industry to which the company belongs and the name of the position you are engaged in. If you or your immediate family member is a regulator, you also need to fill in the name of the regulated member company and the stock code of the listed company; when your professional status is a student or retiree, you only need to fill in the source of income information.

(3) Order transaction

When you buy or sell securities, futures, and options by yourself or entrust us, you may need to provide us with the type of order, the code, price, and quantity of the securities, whether it is margin trading, the ratio of margin trading, and/or Entrusted transaction time, whether to allow pre-market and post-market transactions.

When you use the reminder function, you may need to enable the calendar permission of the device. We will read/write the date of the company action you follow in the calendar according to your operation, so as to provide you with reminder services in time.

When you turn on the fingerprint or face recognition transaction verification function, you agree to authorize us to verify your fingerprint or face instead of verifying your transaction password to ensure transaction security. You can also turn on the fingerprint or face verification function before entering the transaction or fund account to get a more secure user experience.

If you do not want to provide the above information or refuse to open the above permission, you will not be able to use the corresponding services and functions provided by us.

(4) Deposit/Withdraw Funds

When you deposit/withdraw funds to your account, according to risk control and anti-money laundering requirements, you need to provide your bank card number, bank card holder name (must be the same as the name of the opened fund account), and deposit/withdrawal The amount of funds information.

(5) Customer Service

When you contact us or submit a dispute settlement or an application for personal account related business operations, in order to protect your account and system security, we need you to provide the necessary personal information to verify your identity.

In order to facilitate contact with you and help you solve the problem as soon as possible or record the handling plan and result of related problems, we may save your communication/call records and related content (including account information, order information, and information provided by you to prove relevant facts). Other information, or the contact information you left), if you consult, complain or provide suggestions for a specific order, we will use your account information and order information.

In order to provide services and improve service quality for reasonable needs, we may also use other information about you, including relevant information you provide when you contact customer service, and questionnaire response information sent to us when you participate in a questionnaire survey.

3. According to relevant laws, regulations and national standards, in the following

situations, we may collect and use your personal information in accordance with the law without your authorization and consent:

- (1) Directly related to national security and national defense security;
- (2) Directly related to public safety, public health, and major public interests; and
- (3) Directly related to criminal investigation, prosecution, trial, and execution of judgments;
- (4) In order to protect your or others' life, property and other major legal rights and interests, but you cannot get your consent in time;
- (5) The personal information collected is disclosed to the public by yourself;
- (6) Collect your personal information from legally publicly disclosed information (for example: legal news reports, government information disclosure, etc.);
- (7) Necessary for the implementation and performance of this policy according to your requirements;
- (8) Necessary for maintaining the safe and stable operation of the provided service, such as: discovering and handling service failures;
- (9) Necessary for legal news reporting;
- (10) Other circumstances stipulated by relevant laws and regulations.

II. How we use cookies and similar technologies

1. A cookie is a small text file created by a website server and saved on the user's browser. When a user visits the website server, the website can obtain cookie information. In addition to being used to confirm the identity of users, cookies can also be used to store user information and track user visits.

In addition to using cookies to confirm the user's identity and login status, we will not collect and track any user's information and behavior through it.

You can manage and delete cookies according to your preferences, and most browsers have a function that allows you to disable or delete cookies in the system. It should be noted that blocking cookies may cause some functions of our website or system to not work effectively or be unavailable, which may affect your experience.

2. In addition to cookies, we will also use other similar technologies such as Authorization or "Web Beacon" on the website. Authorization is an HTTP protocol header transmitted between web browsers and the web server, in order for the web server to authenticate your access to server resources available only to users who logged in. Web beacon can be used to count users who browse web pages. We will use Authorization to record your identity and collect information about your web browsing activities through web beacon, such as: Internet Protocol (IP) address, web browser type, Internet service provider (ISP), visited pages, operations system, browsing date/time, etc. so that we can have better understanding of users and improve our products or services.

3. 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 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.

III. How we share, transfer, and disclose your personal information

1. Share

Unless otherwise specified below or you agree that we share your personal information with third parties, we will not transfer your personal information to third parties. If a third party merges, acquires, reorganizes, or sells assets, or for legal or other reasons, we will transfer your information to such entities in order to continue to provide services to you. In such cases, we will always require relevant third parties to comply with this privacy policy.

We only share your information with selected third parties when reasonably necessary, including:

(1) Subsidiaries

Your personal information may be shared with ROCKFLOW's affiliates. These affiliates can only use your personal information in accordance with this privacy policy. If you need to change the processing purpose of your personal information, we will ask for your authorization and consent separately.

(2) Service Provider

Only to achieve the purpose stated in this policy, some of our services will be provided by service providers, which may include website hosting, data analysis, payment convenience, information technology and related infrastructure provision, customer service, email sending, targeted other service provider services such as advertising recognition and delivery, mailing services. We will only share your personal information for legal, legitimate, necessary, specific, and clear purposes, and will only share personal information necessary to provide services. Our service providers need to provide the same or equivalent user data protection as described in this privacy policy, and are prohibited from retaining, using or disclosing your personal information except for those necessary to provide services to us.

(3) Advertising Partner

We may share reports on trends and their advertising effectiveness with advertising partners to help them better understand their audience. We will not share your personally identifiable information, such as your name or email address, unless you allow us to do so.

(4) Government, public sector, regulatory, judicial and law enforcement agencies or authorities

In some cases, we are required to disclose your information by law, including:

- a. To comply with legal obligations or requirements, such as court orders, subpoenas or other legal procedures;
- b. Enforce our terms;
- c. Dealing with matters related to security or fraud; or
- d. An emergency situation involving death, serious personal injury risk or any risk of endangering children occurs;

The premise is that the entity requesting the information has effective jurisdiction to obtain your personal information.

2. Transfer

We will not transfer your personal information to any company, organization or individual, except in the following cases:

- (1) Obtain your consent in advance;
- (2) According to laws and regulations or mandatory administrative or judicial requirements;
- (3) When it comes to asset transfer, acquisition, merger, reorganization or bankruptcy liquidation, if it involves the transfer of personal information, we will inform you of the situation and require new companies and organizations that hold your personal information to continue to be bound by this policy . If the purpose of using personal information is changed, we will require the company or organization to obtain your consent.

3. Disclose

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

- (1) After obtaining your explicit consent;
- (2) Apply the relevant provisions of laws and regulations or enforce court judgments, rulings or other legal procedures or comply with the legal and mandatory requirements of the competent government departments (including other statutory authorized organizations);
- (3) Reasonable and necessary purposes for the implementation of relevant service agreements or this policy, the maintenance of public interests, and the protection of the personal and property safety of our customers, us or our affiliates, other users or employees, or other legitimate rights and interests.

4. Exception

According to relevant laws, regulations and policy standards, in the following situations, we may share, transfer and publicly disclose your personal information without your consent in accordance with the law:

- (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;
- (4) In order to protect your or other individuals' major legal rights and interests, such as life and property, but it is difficult to obtain your own consent;
- (5) Your personal information disclosed to the public on your own;
- (6) Personal information collected from legally publicly disclosed information (for example: legal news reports, government information disclosure, etc.).
- (7) Please be aware that, in accordance with applicable laws, if we take technical measures and other necessary measures to process personal information so that the data recipient cannot re-identify a specific individual and cannot restore the information, the sharing, transfer, transfer, and disclosure of such processed data does not require separate notice to you and your consent.

IV. How we protect your personal information

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

We will take all reasonable and feasible measures to ensure that no irrelevant personal information is collected. We will only retain your personal information 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. If the aforementioned data storage period is exceeded, we will delete your personal information within a reasonable period of time or take technical measures for anonymization, except as otherwise provided by laws and regulations.

We will establish an emergency response plan. If a security incident such as a personal information leak occurs, we will activate an emergency response plan to prevent the expansion of security incidents. We will promptly inform you of the relevant information of the incident by email, letter, telephone, push notification, etc. If it is difficult to inform the subject of personal information 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 information.

We are not responsible for security omissions caused by third parties accessing your personal information due to your failure to maintain the privacy of your personal information. Notwithstanding the above provisions, if any other Internet users use your account without authorization or any other security breaches, you should notify us immediately. Your assistance will help us protect the privacy of your personal information.

V. Your right to protect your personal information

In accordance with relevant laws, regulations, standards, and the common practices of other countries and regions, we guarantee that you exercise the following rights with respect to your personal information:

1. Access your personal information
 - (1) You have the right to access your personal information, except for exceptions provided by laws and regulations;
 - (2) You can manage your account by logging into the mobile application homepage and entering the "Transaction" page. Click "Transaction-More-Account-Account Settings" to access and change certificate information, address information, work

information, asset information, and tax information.

- (3) You can manage your transaction password by logging in to the application homepage and entering the "My" page. Click "My-Settings-Security Settings-Modify Transaction Password" to change the transaction password;
- (4) You can log in to our website homepage, enter the "Personal Center-Account Settings" page, you can access and change the certificate information, address information, work information, asset information, tax information;
- (5) You can view your transaction records on our website and mobile applications;
- (6) If you cannot access the above information, you can get in touch with customer service, and we will respond to your access request within 20 working days;

2. Correct your personal information

You can correct or supplement your personal information through the methods listed in "Access to Your Personal Information".

If you are unable to manage this personal information through the above methods, you can contact our customer service at any time. We will respond to your request for access within 20 working days.

3. Delete your personal information

In the following situations, you can request us to delete your personal information. Please refer to the contact information in Item 10 "How to Contact Us" for the details of the deletion request. After we receive your request, we will delete you in accordance with the law used. 'S personal information:

- (1) If our handling of your personal information violates the law;
- (2) If we collect and use your personal information without obtaining your explicit consent;
- (3) If our handling of personal information seriously violates the agreed terms with you;
- (4) If you no longer use our products or services, or you have actively cancelled your account;
- (5) If we no longer provide you with products or services;

4. Protect your personal information

You can protect your personal information by using complex passwords and not revealing your login password or account information to anyone. Once you leak your account number and its password, it may have unfavorable consequences for you. If you find that your account number and password have been or will be leaked for any reason, please contact our customer service immediately so that we can take corresponding measures. However, until we become aware of this situation and take action within a reasonable time, we are not responsible for it.

We are not responsible for the loss of your personal information being accessed by a third party due to your failure to protect the privacy of your personal information. If you find any unauthorized use of your account or other security breaches, you must notify us immediately. Your assistance will help us better protect your personal information.

5. Change the scope of your authorization or withdraw your authorization

You can change the scope of your authorization to continue to collect personal information or withdraw your authorization by deleting information, turning off device functions, etc. You can also withdraw all our authorization to continue to collect your personal information by canceling your account.

Please understand that each business function requires some basic personal information to be completed. After you withdraw your consent or authorization, we cannot continue to provide you with services corresponding to the withdrawal of your consent or authorization, and will no longer process your corresponding personal information. However, your decision to withdraw your consent or authorization will not affect the previous processing of personal information based on your authorization.

6. Log out of your account

You can apply for cancellation of your account in the following ways:

- (1) You can directly apply to cancel your account on the "My" page by clicking "Settings"->"Account Management"->"Account Cancellation";

- (2) Contact our customer service for help and assist you in applying for cancellation of your account.

After you actively cancel your account, we will stop providing you with products or services, delete your personal information in accordance with the requirements of applicable laws, or make it anonymized.

VI. How do we protect the personal information of minors

1. If you are a minor, we will refuse to provide you with corresponding services in accordance with applicable laws and regulations.
2. If we find that you are a minor, we will refuse to provide you with corresponding services and delete your personal information in accordance with applicable laws and regulations.

VII. How your personal information is transferred globally

The personal information collected and generated in the relevant regions will be stored in the location of the ROCKFLOW subject that provides you with services, except in the following cases:

1. Applicable laws have specific regulations.
2. Obtain your explicit authorization; or
3. You directly obtain cross-border services through the Internet and actively implement other actions.

In particular, our contract with the recipient requires the recipient to protect your personal information and, in general, provide safeguards equivalent to the applicable requirements in this policy for New Zealand entities or the 2000 Privacy Act.

In response to the above situation, we will ensure that your personal information is fully protected under this policy.

VIII. The scope of application of this policy

This policy applies to all services provided by all companies under ROCKFLOW that you use, except for the services that we clearly stated that we need to apply our other separately formulated privacy policies or terms. However, some services have set their specific privacy guidelines/statements as needed. If there is any inconsistency between this policy and the privacy guidelines/statements of specific services, please refer to the specific privacy guidelines/statements.

IX. How to update this policy

We will update this policy in a timely manner 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 policy. We will publish it on this page. The changes made to this policy will be notified through official website announcements 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.

X. How to contact us

If you have any questions, comments or suggestions about this policy or data processing, you can contact us by phone and email. Our contact information is as follows:

Address: FLOW AI 13 / F, AVIC I. F. TOWER, Chaoyang District, Beijing

Email: findus@rockflow.ai