
Privacy Policy
for ClariMate Application

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Introduction:

You are welcome to use ClariMate Application (the "**Application**") provided by **Buffet Crampon (Beijing) Musical Instruments Technical Services Co., Ltd.** ("we" or "us") in China mainland through various platforms. Our registered address is: E8, No. 155, Jijiamiao, Huaxiang Town, Fengtai District, Beijing (Zip Code: 100070).

This Application is only available to Users of and over the age of 14 in China mainland. If you are under the age of 14, please do not use the Application.

We hereby inform you through this *Privacy Policy* of how we collect, use, store, share, and transfer your Personal Information when you use this Application, as well as how you can exercise your rights of Personal Information. *The Informing Letter on Personal Information Cross-border Transfer and Separate Consent* [api.buffet-group.cn/content/cross-border/en], the *Informing Letter on Sensitive Personal Information Processing and Separate Consent* [api.buffet-group.cn/content/sensitive/en], and the *Informing & Consent Letter on the Processing of Personal Information for Marketing Purposes* [api.buffet-group.cn/content/marketing/en] provided to you separately are also part of this *Privacy Policy*.

Before you start to use the Application, please be sure to read and understand this *Privacy Policy* carefully, especially the terms marked by us in bold/bold underline, to ensure that you fully understand and agree before you start using the Application. If you have any questions, comments or suggestions about the content of this *Privacy Policy*, you can contact us by sending an email to privacy@cn.buffetcrampon.com.

This *Privacy Policy* will help you understand the following:

1. *Scope of this Privacy Policy and definitions of terms*
2. *How your Personal Information is processed*
3. *Sharing, transferring, and publicly disclosing your Personal Information (including cross-border Personal Information transfer)*
4. *How to protect your Personal Information*
5. *How to exercise your Personal Information Rights (including deregistration of Account)*
6. *Where Personal Information is stored and retention period*
7. *Protection of Personal Information of Children (under the age of 14).*
8. *Notices and Amendments*
9. *How to contact us*

1. Scope of this *Privacy Policy* and Definitions of Terms

This *Privacy Policy* is only closely related to your Personal Information Processing activities related to your use of the Application through various platforms (i.e., Android, iOS (including iOS, macOS) and Windows). We will only collect and process your Personal Information as agreed in this *Privacy Policy*.

- **Personal Information:** As defined under China's *Personal Information Protection Law* (“*PIPL*”), this refers to any information recorded by electronic or other means relating to identified or identifiable natural persons, excluding information that has undergone Anonymization Processing.
- **Sensitive Personal Information:** As defined under *PIPL*, this refers to Personal Information that, if disclosed or illegally used, may easily lead to infringement of human dignity or endangerment of personal/property safety, including but not limited to biometric data, religious beliefs, specific identity details, medical and health information, financial accounts, location tracking data, along with Personal Information of minors under fourteen (14) years of age.
- **Processing (of Personal Information):** As defined under *PIPL*, processing refers to the full lifecycle activities involving Personal Information, including but not limited to its collection, storage, use, refining, transmission, provision, disclosure, and deletion.
- **Personal Information Rights:** As stipulated under *PIPL*, this refers to the rights of individuals in Personal Information Processing activities, including but not limited to: the right to be informed, the right to decide, the right to restrict or object to Processing, the right to access, the right to copy, the right to data portability, the right to rectification, the right to erasure, and the right to withdraw consent.
- **Anonymization/Anonymize(d/ing):** As defined under *PIPL*, this refers to the process by which Personal Information is processed to render it impossible to identify specific natural persons and irreversible to restore.
- **Separate Consent:** According to the definition in the national standard *Security Requirements for Processing Sensitive Personal Information*, it refers to specific and explicit consent given by an individual specifically for the processing of their sensitive personal information.

To assist your understanding of this *Privacy Policy* within the context of relevant Personal Information Processing activities, definitions and interpretations of key terms will be provided where appropriate in the text. Any Capitalized Terms used herein but not expressly defined in this *Privacy Policy* shall have the meanings ascribed to them in the *Terms of Use*. Where neither document provides a definition, the terms shall be construed according to applicable laws and regulations; absent such legal definitions, they shall be interpreted in accordance with prevailing industry practice.

2. How Your Personal Information is Processed

2.1 The categories, purposes and scenarios in which your Personal Information is collected

The scenarios in which we process your Personal Information can be broadly divided into two categories:

- Necessary scenarios: If you refuse to provide Personal Information, you will not be able to use the Application and/or the Functionalities of the Application. Details please see Article 2.1.1.

- Optional scenarios: You are free to choose whether or not to provide your Personal Information, and refusal will not affect your use of the Application. After giving consent, you may withdraw your consent to the provision of Personal Information. Details please see Article 2.1.2.

2.1.1 Under the following necessary scenarios, if you refuse to provide necessary Personal Information, you will **not be able to use the Application or the Functionalities** of the Application.

<p>Necessary scenarios and purpose #1: When you register and log in to the Application for the first time, you need to provide us with or allow us to collect the following necessary Personal Information. If you refuse, you will not be able to register or log in to the Application.</p>
<p>Collection scenario: When registering for the first time, the User needs to fill in all the information on the registration page. If you do not fill in the form, fill in the information incompletely, or if you are under the age of 14, you will not be able to register successfully.</p>
<p>Personal Information Required:</p> <ul style="list-style-type: none"> - <u>E-mail address, User name, login password</u>: used for Account creation and management. - <u>Country/Region</u>: Used to determine the type of language provided to the User. - <u>User Category</u>: (teacher, student, artist, dealer or other). It is used to estimate the User's music level to adjust the initial music-related configuration and ensure the basic experience of the Functionalities of the Application. - <u>Age Range</u>: It is used to screen Users over the age of 14 and prevent Users under the age of 14 from registering/logging in.

<p>Necessary scenarios and purpose #2: After you successfully register and log in to the Application, you need to provide us with or allow us to collect the following necessary Personal Information; If you refuse, you will not be able to log in or use the Application.</p>
<p>Collection scenario: Every time a User logs in to the Application.</p>
<p>Personal Information required: E-mail address, User name, login password</p>

<p>Necessary scenarios and purpose 3: After you have successfully logged in to the Application, if you need to use the Functionalities of the Application, that is, to assist you in playing musical instruments, you need to connect the Application with your musical instrument or other extended devices of the musical instrument through the Bluetooth function in a networked state. In this case, we will need to collect and process the following necessary Personal Information, if you refuse, the Bluetooth connection will fail, and you will not be able to use the Application to assist you in musical instrument practice.</p>
<p>Collection scenario: When the Bluetooth function is turned on and before you successfully use the Functionalities of the Application.</p>
<p>Personal Information required: the Bluetooth connection permission of the device on which you install the</p>

Application (only under the Android system, due to the requirements of the Android system itself, it is also necessary to read the User's **precise location information** [ACCESS_FINE_LOCATION]).

Precise location information is Sensitive Personal Information. We will carefully process the Sensitive Personal Information you provide and protect it from unnecessary Processing and illegal infringement. We will NOT provide the Sensitive Personal Information to parties outside China mainland.

Please refer to the *Informing Letter on Sensitive Personal Information Processing and Separate Consent* we provided separately to grant your Separate Consent.

Necessary scenarios and purpose #4: For the app to run on Android devices, access to USB is required. The data is not stored outside of the app and is required for the app to run normally.

Collection scenario: When app is launched on an Android device

Personal Information required: Storage: [USB_PERMISSION]

Necessary scenarios and purpose #5: For the app to run on Android devices, access to Bluetooth hardware is required. The data is not stored outside of the app and is required for the app to run normally.

Collection scenario: When app is launched on an Android device

Personal Information required: [FOREGROUND_SERVICE_CONNECTED_DEVICE]

Necessary scenarios and purpose #6: After you have successfully logged in and started using the Application, if you install the Application on different devices and need to synchronize your Account data among different devices, we will need to collect and process the following necessary Personal Information (in the state of networking), if you refuse, the data synchronization function will not be realized.

Collection scenario: When you log in to your Account while connected to the Internet.

Personal Information required: Training Sets data: Meta data and Spectrum Data.

Meta Data: Users name, File directory that the file was stored in, Computer information (os, build number), Persistent data (volume settings, midi settings), Instrument type meta data (including make, model, barrel length).

Spectrum Data: the acoustic response data of the specific instrument measured by the ClariMate Device.

Necessary scenarios and purpose #7: Overseas operation and maintenance teams **located in France and the United Kingdom** provide technical maintenance services for the basic operation of the App. **If you refuse, you will not be able to use the Application because of the lack of basic operation maintenance.**

Cross-border transfer of Personal Information (Yes): For details, please refer to the *Informing Letter on Personal Information Cross-border Transfer and Separate Consent* we provided separately.

Collection scenarios:

- When the Application is operating normally;
- When the Application is running abnormally;

<ul style="list-style-type: none"> - When an error occurs in the App, resulting in a bug report.
<p>Necessary Personal Information to be cross-border transferred (not contain any Sensitive Personal Information, "O&M Essential User Account Information")</p> <p>Button presses; Open pages; Unique Users identifier; Returning User identifier; Crash reports (which may contain computer User name, computer information [make, model] and crash information [error codes and location within the application]); Selected Dropdown values; Dialog Boxes spawned; Screen resolution /window resolution; Device error report; Reed calibration values; Instrument type (make and model); Connection method and failures; Occasional battery monitoring; Periodic Recognition Quality of notes.</p>

2.1.2 In the case of marketing purposes/ scenarios, you are **free to choose** to accept the Processing of Personal Information (EXCLUDING Sensitive Personal Information) for marketing purposes or not. Your refusal to provide Personal Information will **NOT affect** your use of the Functionalities of the Application, but you will not receive commercial marketing information and personalized information from us. For further details, please refer to the table below and/or the *Informing & Consent Letter on the Processing of Personal Information for Marketing Purposes* we provided to you separately:

<p>Scenarios where Personal Information is used for marketing: When you use this Application, in order to provide you with information about our products and services, we will collect and process your necessary Personal Information required for the following marketing purposes after obtaining your prior consent.</p>
<p>Withdrawal of an individual's consent: Even after your consent, you can withdraw your consent at any time by clicking on the "<i>unsubscribe</i>" button in the email (if any) or by contacting us by email (privacy@cn.buffetcrampon.com).</p>
<p>Collection scenario: Upon first-time registration/login and User consent, we collect the following specified Personal Information for marketing. Refusal prevents collection. Information obtained for other necessary purposes won't be used for marketing.</p>
<p>Personal Information Required:</p> <ul style="list-style-type: none"> - Email address, Username: to send marketing content to Users, including but not limited to: promotional offers, personalized communication, newsletters, customer feedback and surveys, User engagement, new features, offline event introductions, tips to help new User, etc. ("Marketing Content"); - Country: Push Marketing Content to Users in their region (as described above); - Age Groups: Deliver age-appropriate Marketing Content to Users (as described above); - User Category: Push Marketing Content (as described above) that matches the User's category (mainly used to determine whether music is related and music level). - School information (applicable for students/teachers only): used to internally analyze the relations between the school and the User group, and accurately push the offline activities of the school to the User (if any).
<p>Whether it involves the export of Personal Information (No):</p> <p>The above Processing activities of Personal Information for marketing purposes do NOT involve any cross-</p>

border transfer of Personal Information. All Personal Information Processing activities required for marketing activities are conducted by us (**Buffet Crampon (Beijing) Musical Instruments Technical Services Co., Ltd.**) **in China mainland.**

2.2 Exceptions to Obtaining Authorized Consent

Please be aware that, in accordance with relevant laws and regulations, your authorization and consent are NOT required for the collection of your Personal Information under the following circumstances:

- 1) directly related to national security and national defense security;
- 2) directly related to public safety, public health, or major public interests;
- 3) directly related to judicial or administrative law enforcement such as criminal investigation, prosecution, trial, and judgment enforcement;
- 4) For the purpose of protecting the life, property and other major legitimate rights and interests of you or other individuals, but it is difficult to obtain your consent;
- 5) The Personal Information collected is disclosed to the public by yourself;
- 6) Personal Information is collected from lawfully and publicly disclosed information, such as lawful news reports, government information disclosure, and other channels;
- 7) Necessary for the conclusion and performance of relevant contracts or other written documents at your request;
- 8) It is necessary to maintain the safe and stable operation of the App, such as discovering and disposing of faults in the Application;
- 9) In connection with our performance of our obligations under laws and regulations;
- 10) Other circumstances stipulated by laws and regulations.

2.3 Rules for the Use of Personal Information

We will collect and use your Personal Information in accordance with this *Privacy Policy*.

When we use Personal Information for other purposes not specified in this *Privacy Policy*, or use Personal Information collected for specific purposes for other purposes, we will ask for your consent in advance.

Please understand and agree that all Personal Information you provide when using this Application, unless you delete it or refuse us to collect it through system settings or informing us by email, it will be deemed that you continue to authorize and consent to our use during your use of this Application. When you terminate the User relationship with us (**e.g., the Account is deleted or cancelled**), we will stop using and we will delete your Personal Information, unless otherwise provided by laws and regulations or otherwise agreed between you and us.

3. Sharing, transferring, and publicly disclosing your Personal Information (including cross-border Personal Information transfer)

3.1 Sharing

We will not share your Personal Information with any company, organization or individual, but we may provide

Personal Information to third parties in the following exceptions. When we lawfully share your Personal Information with third parties, we will take encryption and other means to ensure the security of your Personal Information, and conduct a Personal Information security impact assessment on the sharing. We will conduct a reasonable review of the data security environment of the companies and organizations with which we share Personal Information, and sign strict data Processing agreements to require third parties to take adequate protection measures for your Personal Information and strictly comply with relevant laws, regulations and regulatory requirements.

- 1) Sharing with explicit consent: With your explicit consent, we will share your Personal Information with other parties.
- 2) Sharing under statutory circumstances: We may share your Personal Information externally for the purpose of fulfilling our obligations under laws and regulations.
- 3) We hope you understand that we are not able to provide the Application to you alone, and in many cases we will need to work with our service providers to provide you with these services. Therefore, in order to meet the needs of providing you with the above services, we need to provide some of your Personal Information to our suppliers and partners in the form of sharing or entrusting Processing. We will take necessary technical and management measures to protect the security of your Personal Information as much as possible.

Sharing with Authorized Partners: We bind authorized partners, including through agreements, to have access to only the information they need to perform their duties and not to use the shared Personal Information for any other purpose. **If you refuse to allow our partners to collect your Personal Information necessary to support the functions and purposes of the App, you will not be able to use the App.**

At present, our authorized partners **in and outside China mainland** include the following types and entities:

- **(Domestic) cloud service provider: Ali-Cloud Computing Co., Ltd**
 - All Personal Information we receive will be hosted in a secure domestic server in China mainland provided by it.
- **(Overseas) Operation & Maintenance service provider: Buffet Crampon**
 - Buffet Crampon is a company registered **in France**, i.e., our head office in France, with registered office at 5, rue Maurice Berteaux 78711 Mantes-la-Ville–FRANCE.
 - Buffet Crampon has partnered with Audio Inventions Ltd. to develop this Application and continues to provide operation and maintenance services for this Application.
 - **The User Account Information Necessary for the Operation and Maintenance of the Application** generated in the course of operation in China mainland and hosted in China mainland (***as listed in "Necessary Scenarios and Purpose #7" in the above***) will be provided to Buffet Crampon located **in France** by **remote access** when necessary, so that it (in cooperation with Audio Inventions Ltd.) can provide basic Application operation and maintenance services.
- **(Overseas) Operation & Maintenance service provider: Audio Inventions Ltd.**
 - Audio Inventions Ltd. is a company registered **in the United Kingdom** with its registered office at 269 Farnborough Road, Farnborough, Hants, GU14 7LY.

- Audio Inventions Ltd. has partnered with Buffet Crampon to develop the Application and continues to provide operation and maintenance services for the Application.
- **The User Account Information Necessary for the Operation and Maintenance of the Application** generated in the course of operation in China mainland and hosted in Chinese mainland (as listed in "*Necessary Scenarios and Purpose #7*" in the above) will be provided to Audio Inventions Ltd. located **in the United Kingdom** by **remote access** when necessary to enable it (in cooperation with Buffet Crampon) to provide basic Application operation and maintenance services.

We will sign strict confidentiality agreements with companies, organizations and individuals with whom we share Personal Information, requiring them to process your Personal Information within the scope and time limit agreed in this *Privacy Policy* in accordance with our instructions and any other applicable legal requirements, under the condition of taking necessary confidentiality and security measures.

If you have any questions about the above Personal Information Processing activities, you need to contact any of the above domestic and overseas service providers, or exercise any Personal Information rights, you can contact us by email sent to privacy@cn.buffetcrampton.com, and we will reply to you within 15 working days.

3.2 Transfer

We will not transfer your Personal Information to any company, organization or individual, except in the following circumstances:

- 1) with your prior explicit consent or authorization;
- 2) When it is necessary to comply with applicable laws and regulations, legal procedures, mandatory administrative or judicial requirements;
- 3) Provided in accordance with the relevant agreements or other legal documents entered into with you;
- 4) With the development of our business, we and our affiliates may enter into mergers, acquisitions, asset transfers or similar transactions, and if the transfer of Personal Information is involved, we will require the new company or organization that holds your Personal Information to continue to be bound by this *Privacy Policy*, otherwise we will require the company or organization to seek your authorization and consent again.

3.3 Public Disclosure

We will not publicly disclose your Personal Information except in the following circumstances:

- 1) With your explicit consent or based on your active choice, we may publicly disclose your Personal Information;
- 2) Based on the provisions of laws and regulations, the needs of litigation and dispute resolution, or the requirements of administrative and judicial authorities in accordance with the law, we may disclose your Personal Information to the competent authorities. However, we guarantee that in the event of the above-mentioned circumstances, we will require the disclosure requesting party to issue corresponding valid legal documents and take security measures that comply with laws and industry standards for the disclosed information.

3.4 Exceptions to the prior authorization and consent obtained when sharing, transferring, or publicly disclosing Personal Information

In the following circumstances, sharing, transferring, and publicly disclosing your Personal Information do not require your prior authorization and consent:

- 1) directly related to national security and national defense security;
- 2) directly related to public safety, public health, or major public interests;
- 3) directly related to judicial or administrative law enforcement such as criminal investigation, prosecution, trial, and enforcement of judgments;
- 4) For the purpose of protecting the life, property and other major legitimate rights and interests of you or other individuals, but it is difficult to obtain your consent;
- 5) Personal Information that you disclose to the public;
- 6) Personal Information is collected from lawfully and publicly disclosed information, such as lawful news reports, government information disclosure, and other channels.

Please be aware that, in accordance with the laws of the People's Republic of China, the sharing and transfer of Anonymized Personal Information, i.e., ensuring that the data recipient cannot recover and re-identify the Personal Information subject, is NOT an external sharing, transfer and public disclosure of Personal Information, and the hosting and Processing of such data will not require further notice to you and your consent.

4. How to protect your Personal Information

4.1 We have taken reasonable and feasible security measures that comply with industry standards to protect the security of the Personal Information you provide and prevent unauthorized access, public disclosure, use, modification, damage or loss of Personal Information. However, please understand that due to technical limitations and various malicious means that may exist, it is impossible to ensure 100% security of information in the Internet industry, even if we do our best to strengthen security measures. You need to understand that the systems and communication networks you use to access our services may have problems due to factors beyond our control. The security technical measures we have taken to protect Personal Information include, but are not limited to:

- Passwords are hashed (not stored in clear text);
- SSL encryption is used for data transmission (to ensure the security of transmission);
- User data access control.

4.2 We will take reasonable and practicable steps to avoid the collection of irrelevant Personal Information. We will only retain your Personal Information for as long as necessary to achieve the purposes described in *this Privacy Policy* (generally if you do not log in to the Application for 12 consecutive months), unless it is necessary to extend the retention period or permitted by law. Your Personal Information will be securely deleted after expiration.

4.3 The Internet is not a completely secure environment, and we strongly recommend that you protect your Personal Information and only provide it to others when necessary. If you find that your Account or password has been

compromised, please contact us immediately by email (privacy@cn.buffetcrampon.com) so that we can take appropriate measures according to your application.

4.4 In the unfortunate event of a Personal Information security incident, we will notify you in accordance with the requirements of laws and regulations. We will also report the handling of Personal Information security incidents in accordance with the requirements of the regulatory authorities.

5. How you exercise your Personal Information Rights (including deregistration of Account)

In accordance with the relevant laws, regulations and standards of China, as well as the common practices of other countries and regions, we protect you to exercise the following rights with respect to your Personal Information:

5.1. Accessing, inquiring, correcting, and supplementing Personal Information

You have the right to access, correct or supplement your Personal Information by any of the following means:

- Contact us via email (privacy@cn.buffetcrampon.com) and we will respond to your request within fifteen (15) business days; Or,
- Through the "*Account Information*" on the "*Account Management*" interface of the App, click "*Edit*" to modify the following categories of Personal Information: User name, email address, User category, country/region.

In particular, the following two categories of information **cannot be modified by the User in the backend system** under normal circumstances. If you need to modify it under special circumstances, please contact us through the above email to make the change.

- "*Account Status*" refers to the User's actual login status and indicates whether the User's Account is active/dormant;
- The "*Country/region*" information is provided at the time of User registration and cannot be modified under normal circumstances.

5.2. Deletion of Personal Information

You may delete your Personal Information by contacting us via email (privacy@cn.buffetcrampon.com). You may request us to delete your Personal Information under the following circumstances:

- 1) If our Processing of Personal Information violates laws and regulations;
- 2) If we collect and use your Personal Information without your explicit consent;
- 3) If our Processing of Personal Information seriously violates the agreement with you;
- 4) If you decide not to use the Application anymore and inform us by the above email, or you take the initiative to ***cancel your Account through the "Account Information" on the "Account Management" interface of the Application backend and click "Delete Account"***;
- 5) If you do not log in to the Application for 12 consecutive months;
- 6) If we permanently cease to provide you with the Application.

If we decide to respond to your deletion request, we will also notify the entities that have obtained your Personal Information from us (if any) as far as possible and request them to delete it in a timely manner, unless otherwise

provided by laws and regulations, or these entities have obtained your independent authorization.

When we delete information from the App, we may not immediately delete the corresponding information from the backup system, but we will delete or Anonymize the information when the backup is updated.

5.3. Deregister your Account

Your Account can be deregistered in the following three cases:

- You can deregister your Account at any time through "*Account Information*" on the "*Account Management*" interface of the Application backend system and click "*Delete Account*".
- You may deregister your Account at any time by contacting us by sending an email to privacy@cn.buffetcrampon.com.
- If you do not log in to the Application for a total of 12 consecutive months, your Account will be deemed to be dormant. In such a case, we will send you an email alerting you that your Account is about to become dormant within 30 days prior to the expiration of the term, and provide you with a link to log in to the Application. If you do not log in to the Application through this link or directly through the Application before the expiration of the period, we will delete your (dormant) Account information (within a maximum of fifteen (15) business days).

Please note that the above-mentioned deregistration/deletions are irreversible. If you decide to use the Application again after your Account has been deleted, you will need to register a new Account. Since all personally identifiable information about you is deleted, only Anonymized User ID and Technical Data remain, so even if you re-register an Account, the new Account will not be linked to your previous Account history. Therefore, we recommend that you carefully consider deregistration of/deleting your Account information.

****Technical Data: This contains Application usage data, which comprises of button presses, selected settings, runtime settings, OS environment, slider settings, access times, screen resolution and login states.***

**** Anonymized User ID: after deletion of User Account, it is the database key that links together with the remaining data, but it cannot be used to identify the User from any data that is retained after User Account deletion.***

5.4. Obtain a copy of your Personal Information

You may obtain a copy of the Personal Information we collect and process about you by contacting us by sending an email to privacy@cn.buffetcrampon.com. Subject to compliance with relevant laws and regulations and technical feasibility, we will provide you with a copy of your Personal Information upon request.

5.5. other

If you need to exercise the above rights in relation to the Personal Information of the deceased User for the sake of your legal and legitimate interests, you can contact us by sending an email to privacy@cn.buffetcrampon.com. At that time, you will need to provide us with proof that you are a close relative or an executor. We will support your request as much as possible in accordance with applicable laws and regulations related to the protection of Personal

Information.

5.6. To respond to your requests and to process them

We will generally respond to your request within fifteen (15) business days of receipt.

For security purposes, you may be required to provide a written request or otherwise prove your identity. We may ask you to verify your identity before Processing your request.

In principle, we do not charge a fee for your reasonable request, but we will charge a certain cost fee for repeated requests that exceed a reasonable limit. We may reject requests that are unreasonably repetitive, require excessive technical means (e.g., need to develop new systems or fundamentally change current practices), pose risks to the legitimate rights and interests of others, or are very impractical.

In the following circumstances, we will not be able to respond to your request in accordance with the requirements of laws and regulations:

- 1) Directly related to national security and national defense security;
- 2) Directly related to public safety, public health, or major public interests;
- 3) Directly related to criminal investigation, prosecution, trial, and enforcement of judgments;
- 4) There is sufficient evidence showing that the Personal Data Subject has subjective malice or abuses rights;
- 5) Responding to your request will cause serious damage to the legitimate rights and interests of you or other individuals or organizations;
- 6) Involving trade secrets;
- 7) For the purpose of protecting the life, property and other major legitimate rights and interests of you or other individuals, but it is difficult to obtain your authorization and consent;
- 8) Responding to your request will cause serious damage to the legitimate rights and interests of you or other individuals or organizations.

6. Where Personal Information is stored and retention period

6.1 Storage location: In principle, the Personal Information collected and generated in the course of our operations within China mainland will be stored within China mainland, except in the following circumstances:

- 1) There are clear provisions in laws and regulations;
- 2) Obtain your explicit authorization (Separate Consent);
- 3) Your personal initiative.

In the above cases, we will ensure that your Personal Information is adequately protected in accordance with this *Privacy Policy*. **For the cross-border transfer of Personal Information, we will separately provide you with the document *the Informing Letter on Personal Information Cross-border Transfer and Separate Consent to inform you of the purpose of the cross-border transfer of Personal Information, the recipient, etc., and obtain your authorization and Separate Consent, and we will ensure that the data recipient has sufficient data protection capabilities to protect your Personal Information.***

6.2 Retention period: We will only retain your Personal Information for as long as necessary to achieve the Processing purposes set out in this *Privacy Policy*. **The general storage period is the duration of your**

Account.

After you request to delete your Personal Information, deregister your Account, or your Personal Information exceeds the retention period due to Account dormancy, we will securely delete or Anonymize your Personal Information in accordance with the requirements of applicable laws.

If we terminate the service, we will delete or Anonymize your Personal Information after termination.

6.3 If we cease to operate, we will immediately stop collecting your Personal Information and delete the Personal Information we have collected.

7. Personal Information of Children (under the age of 14).

Our Application is only available to persons over the age of 14 located in China mainland, and we presume that you have the necessary civil capacity to use the App. Persons under the age of 14 ("Children") should not use the App.

If we discover that we have accidentally collected Personal Information from Children, we will delete the relevant data as soon as possible. If you have any questions about the Personal Information of a child under your guardianship, please contact us by email (privacy@cn.buffetcrampon.com).

8. Notices and Amendments

We may change and update this *Privacy Policy* from time to time. Without your explicit consent, we will not reduce your rights under this *Privacy Policy*. We will post any changes to this *Privacy Policy* on this page. For major changes, we will also provide more prominent notices (including by providing you with pop-up prompts).

The material changes referred to above include, but are not limited to:

- 1) Our service model has changed significantly. Such as the purpose of Processing Personal Information, the types of Personal Information processed, and the way in which Personal Information is used;
- 2) We have undergone significant changes in our ownership structure, organizational structure, etc. Such as business adjustment, bankruptcy mergers and acquisitions, etc.
- 3) changes in the main objects of Personal Information sharing, transfer or public disclosure;
- 4) Significant changes in your rights to participate in the Processing of your Personal Information and the way in which they are exercised;
- 5) When there is a change in the department responsible for handling Personal Information security, contact information and complaint channels;
- 6) When the Personal Information security impact assessment report indicates that there is a high risk.

If you continue to use our Application thereafter, it means that you have fully read, understood and accepted the updated *Privacy Policy* and are willing to be bound by the updated *Privacy Policy*.

9. How to contact us

If you have any questions about the content of this *Privacy Policy*, or if you exercise Personal Information Rights, you may contact us in the following ways: privacy@cn.buffetcrampon.com. In general, we will respond to your

request within fifteen (15) working days after receiving your questions, comments or suggestions and verifying your User identity or within the time limit required by applicable laws and regulations.