# **Privacy Policy**

LUXEN SOLAR ENERGY Co., Ltd. (hereinafter referred to as "we/us") is well aware of the importance of personal information to you and will do its best to protect the security and reliability of your personal information. We promise to take corresponding security measures to protect your personal information in accordance with mature industry security standards.

Please carefully read and understand this Privacy Policy before using our products or services. If you do not agree to this privacy policy, we will not be able to collect and use the necessary information for providing services, and therefore cannot provide you with services normally.

#### How do we collect and use your personal information

We only collect information necessary to achieve product functionality based on the principles of legality, legitimacy, and necessity.

The information you proactively provide when using our services

The information you filled in when registering your account. For example, the account name, nickname, phone number, email address, and other information you filled in when registering your account.

The information you upload when using our products or services.

The information you submitted through our customer service or when participating in our organized events. For example, the survey questionnaire you filled out when participating in our online activity may include information such as your name, phone number, home address, etc.

Some of our services may require you to provide specific personal sensitive information to achieve specific functions. If you choose not to provide such information, you may not be able to use specific functions in the service normally, but it does not affect your use of other functions in the service. If you voluntarily provide your personal sensitive information, it means that you agree that we will handle your personal sensitive information according to the purposes and methods stated in this policy.

The information we obtained when you used the service

Log information. When you use our services, we may automatically collect relevant information and store it as service log information.

Device information. For example, device model, operating system version, unique device identifier, battery, signal strength, and so on.

Software information. For example, software version number, browser type. We collect information about the mobile applications and other software you use to ensure the safety of your operating environment or to provide services.

IP address.

Service log information. For example, the information you search and view when using our services, service failure information, referral websites and other information.

Communication log information. For example, the account you have communicated with while using our services, the time and length of the communication.

Location Information. When you use location-related services, we may record the location information of your device in order to provide you with relevant services.

When you use the Service, we may obtain your geographical location information through IP address, GPS, WiFi or base station;

The information provided by you or other users when using the Service may contain the geographical location information of your location, such as the information of your location in the account information provided by you or the geographical indication information in the photos shared by you or others;

Other Information. To help you better use our products or services, we will collect relevant information. For example, we collect the friend list, group list information, voice print characteristic value information. To ensure that you can contact people you know when using our services, if you choose to enable the Import Address Book function, we may encrypt the name and phone number of your contact and collect only the encrypted information.

Information shared by other users contains your information. For example, photos or videos shared by other users may contain your information.

#### How do we use cookies and similar technologies

#### Cookies

To ensure the normal operation of the website, we will store small data files called cookies on your computer or mobile device. Cookies typically contain identifiers, site names, and some numbers and characters. With the help of cookies, websites can store data such as your preferences or items in shopping baskets.

We will not use cookies for any purpose other than those stated in this policy. You can manage or delete cookies according to your preferences. You can clear all cookies saved on your computer, and most web browsers have a feature to block cookies. But if you do this, you will need to personally change user settings every time you visit our website. To learn more about how to change browser settings, please visit the following links:<Internet Explorer>,<Google Chrome>,<Mozilla Firefox>,<Safari>, and<Opera>.

#### Website Beacons and Pixel Labels

In addition to cookies, we also use similar technologies such as website beacons and pixel labels on our website. For example, the email we send to you may contain a click URL that links to the content on our website. If you click on this link, we will track this click to help us understand your product or service preferences and improve customer service. A website beacon is usually a transparent image embedded in a website or email. With the help of pixel labels in emails, we can know if emails have been opened. If you do not want your activities to be tracked in this way, you can unsubscribe from our mailing list at any time.

#### Do Not Track

Many web browsers have the Do Not Track function, which can issue Do Not Track requests to websites. At present, major internet standards organizations have not yet established relevant policies to specify how websites should respond to such requests. But if your browser has enabled Do Not Track, we will respect your choice.

#### How do we share, transfer and publicly disclose your personal information

According to the Cyber Security Law of the People's Republic of China, your personal information means all kinds of information recorded electronically or otherwise that can identify your personal identity individually or in combination with other information, including but not limited to your name, date of birth, ID number, personal biometric information, address, telephone number, etc.

#### Sharing

We will not share your personal information with any other company, organization or individual except in the following cases:

Sharing with Express consent: After obtaining your express consent, we will share your personal information with other parties.

We may share your personal information in accordance with laws and regulations or mandatory requirements of competent government departments.

Sharing with our Affiliates: Your personal information may be shared with our affiliates. We will only share necessary personal information subject to the purposes stated in this Privacy Policy. If the Affiliated company wants to change the purpose of processing personal information, it will again seek your authorized consent.

Sharing with Authorized Partners: Only for the purpose stated in this Privacy 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. These partners include:

- Cloud Service providers: Part of our services will rely on third-party cloud service platforms, and relevant business data will be stored on such cloud service platforms. The third-party cloud service providers will collect your device information and network information;
- Logistics Service Provider: When you purchase our products or participate in our activities and get prizes, if the relevant goods/prizes need to be delivered by a third party, we will provide the relevant delivery information provided by you to such third-party logistics service providers for the purpose of distribution, including name/company name, shipping address, contact information, etc.

Our partners must comply with our data privacy and security requirements. We will only share your personal information for legal, legitimate, necessary, specific and explicit purposes, and only share personal information necessary for the provision of services.

We will sign strict confidentiality agreements with companies, organizations and individuals with whom we share personal information, requiring them to handle personal information in accordance with our instructions, this Privacy Policy and any other relevant confidentiality and security measures, and we will require them to desensitize your personal information and make it

unrecoverable. To protect your personal information, ensure that you cannot be identified through relevant information or data.

Transfer

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

Transfer with Express consent: After obtaining your express consent, we will transfer your personal information to other parties;

In the case of merger, acquisition or bankruptcy liquidation, if personal information transfer is involved, we will require the new company or organization holding your personal information to continue to be bound by this privacy policy; otherwise, we will require the company or organization to seek authorization from you again.

Public disclosure

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

After obtaining your express consent;

Disclosure based on law: We may publicly disclose your personal information under the circumstances of laws, legal procedures, lawsuits or mandatory requirements of competent government authorities.

#### How do we protect your personal Information

We have adopted industry-standard security measures to protect the personal information you provide and prevent unauthorized access, public disclosure, use, modification, damage or loss of the data. We will take all reasonably practicable measures to protect your personal information. For example, we use encryption to ensure data confidentiality; We use trusted protection mechanisms to protect our data from malicious attacks; We will deploy access control mechanisms to ensure that only authorized personnel have access to personal information; And we will organize security and privacy training courses to enhance employees' awareness of the importance of protecting personal information.

We will take all reasonably practicable measures to ensure that we do not collect irrelevant personal information. We will only retain your personal information for as long as necessary to achieve the purposes stated in the Cost Policy, unless it is necessary to extend the retention period or permitted by law.

The Internet is not an absolutely secure environment, and E-mail, instant messaging, and communication with our users are not encrypted. We strongly recommend that you do not send personal information by such means. Please use a complex password to help us keep your account secure.

The Internet is not an absolutely safe environment, we will do our best to ensure or guarantee the security of any information you send us. If our physical, technical, or management protection facilities are damaged, resulting in unauthorized access, public disclosure, tampering, or destruction

of information, resulting in damage to your legitimate rights and interests, we will bear the corresponding legal responsibilities.

In the event of an unfortunate personal information security incident, we will, in accordance with the requirements of laws and regulations, promptly inform you of the basic situation and possible impact of the security incident, the disposal measures we have taken or will take, the suggestions you can independently prevent and reduce risks, and the remedial measures for you, etc. We will timely inform you of the relevant information of the event by email, letter, telephone, push notification and other means. If it is difficult to inform the subject of personal information one by one, we will take a reasonable and effective way to make announcements.

At the same time, we will also take the initiative to report the handling of personal information security incidents in accordance with the requirements of regulatory authorities.

### **Your Rights**

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

Access your personal information

You have the right to access your personal information, except for exceptions specified by laws and regulations.

If you are unable to access your personal information, you can contact us at any time. We will respond to your access request within 30 days.

Correct your personal information

When you discover that there are errors in the personal information we process about you, you have the right to request us to make corrections.

If you are unable to correct these personal information through the above link, you can contact us at any time. We will respond to your correction request within 30 days.

Delete your personal information

In the following situations, you can request us to delete personal information:

If our handling of personal information violates laws and regulations;

If we collect and use your personal information without your consent;

If our handling of personal information violates our agreement with you;

If you no longer use our products or services, or if you cancel your account;

If we no longer provide you with products or services.

If we decide to respond to your deletion request, we will also notify the entities that obtained your personal information from us and require them to delete it in a timely manner, unless otherwise provided by laws and regulations, or if these entities have obtained your independent authorization.

When you delete information from our service, we may not immediately delete the corresponding information from the backup system, but we will delete it during backup updates.

Cancel your account

You can cancel your previously registered account at any time, and you can operate it yourself on our website.

After canceling your account, we will stop providing you with products or services and delete your personal information according to your request, unless otherwise specified by laws and regulations.

To ensure security, you may need to provide a written request or prove your identity in other ways before performing the above operations. We may require you to verify your identity before processing your request.

In the following situations, according to legal and regulatory requirements, we will not be able to respond to your request:

Related to national security and national defense security;

Related to public safety, public health, and major public interests;

Related to criminal investigation, prosecution, and trial;

There is sufficient evidence to indicate that you have subjective malice or abused your rights;

Responding to your request will cause serious damage to the legitimate rights and interests of you or other individuals or organizations.

## How does your personal information transfer globally

In principle, the personal information we collect and generate within the territory of the People's Republic of China will be stored within the territory of the People's Republic of China. As we provide products or services through globally distributed resources and servers, this means that with your authorized consent, your personal information may be transferred to or accessed from overseas jurisdictions in the country/region where you use the products or services. Such jurisdictions may have different data protection laws or even no relevant laws in place. In such cases, we will ensure that your personal information receives sufficient and equal protection within the territory of the People's Republic of China. For example, we may request your consent for cross-border transfer of personal information, or implement security measures such as data deidentification before cross-border data transfer.

#### How to update this privacy policy

We may make adjustments or changes to this privacy policy in a timely manner. Any updates to this privacy policy will be posted on our website by indicating the update time. Unless otherwise mandatory by laws, regulations or regulatory regulations, the adjusted or changed content will take effect upon notification or publication. If you continue to use any of our services or access our related websites after adjusting or changing your privacy policy, we believe that this represents that you have fully read, understood, and accepted the revised privacy policy and are bound by it.

# How to contact us

If you have any questions, opinions or suggestions regarding this privacy policy, please contact us through the following methods:

Email: <a href="mailto:info@luxensolar.com">info@luxensolar.com</a>

Phone: +86 512 6708 1572