

Updated date: 28/6 2024

Privacy Notice

Effective as of June 26, 2024, XINGYUAN TECHNOLOGY PTE. LTD. (collectively, “we” or “us” or “our”) has updated this Privacy Notice (“Notice”).

Section 1 Overview

We respect the privacy rights of users of our product VP Net (collectively, “Services” or “APP”) and recognize the importance of protecting your information. This Privacy Notice explains how information is collected, retained, used, disclosed, and transferred by us and the available choices you have with regard to your personal information. This Privacy Notice applies to information collected, used or shared by us when you use or access our Services.

Section 2 Changes to This Notice

We may change this Notice from time to time. If we make any changes, we will revise the date at the top of this Notice. If there are material changes to this Notice, we may notify you more directly by email or post a notice on the APP prior to the changes becoming effective. We encourage you to periodically review our Privacy Notice to stay informed about our data protection practices and the ways you can help protect your privacy.

Section 3 Personal Information of Children

We do not knowingly collect or solicit information from anyone under the age of 13. If you are under 13, please do not attempt to use our Services or send any information about yourself to us. If we learn that we have collected information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us personal information, please contact us.

Section 4 Collection of Information

We collect the following certain information which you provide to us or collected automatically when you use our Services or provided by third parties:

- (1) Information for create an account, such as your name, email address, user name and password, etc.
- (2) Usage information, such as the time you access the APP, page views, clicks-through statistics.
- (3) Location information, such as your IP address etc.
- (4) Device information, such as device identifiers, browser types, device types and settings, operating system versions, mobile, wireless, and other network information (such as internet service provider name, carrier name and signal strength), and application version numbers.

Section 5 Use of Information

Your information may be used to perform a variety of purposes, such as:

- (1) Provide, operate, maintain, and improve our Services.
- (2) Monitor and analyze trends, usage, and activities in connection with our Services and for sales, marketing or advertising purposes.
- (3) Investigate and prevent fraudulent activities, unauthorized access to the APP and other illegal activities.

(4) Comply with legal obligations. We may use information about you to comply with our legal requirements.

Section 6 Sharing and Disclosure of Information

We may share information about you as follows:

(1) Consultants and other service providers. We share information with third-party consultants and other service providers who are working on our behalf and require access to your information to carry out that work. These service providers are authorized to use your information only as necessary to provide services to us or our Services.

(2) Compliance with Laws. We may disclose your information to a third party if (a) we believe that disclosure is reasonably necessary to comply with any applicable law, regulation, legal process, or governmental request; (b) to protect security or integrity of our Services; (c) to protect our users or the public from harm or illegal activities; (d) to any other third party with your consent.

We will make sure any third party we share your information with will protect your data as well and comply with Apple's Privacy rules.

Section 7 Links to Third-party

We provide you opportunities to connect with third-party applications or services through our APP. However, please note that this Notice does not apply to your use of such third-party applications and services, and we are not responsible for how those third parties collect, use, and disclose your information. We encourage you to review the privacy notice of those third parties before connecting to or using their applications and services to learn more about their information and privacy practices.

Third party Links of Third party's privacy notice

Vungle <https://liftoff.io/privacy-policy/>

Inmobi <https://www.inmobi.com/privacy-policy>

Pangle www.pangleglobal.com/zh/privacy/partner-en

Mintegral www.mintegral.com/cn/privacy

Google Admob/Firebase policies.google.com/privacy?hl=en

Facebook www.facebook.com/privacy/policy/?entry_point=comet_dropdown

Applovin/Max www.applovin.com/privacy

Appsflyer www.appsflyer.com/legal/privacy-policy

Section 8 Retention of Personal Information

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Notice and in order to provide you the Service, and for as long as we need to provide you Service. We will also retain your information to comply with our legal obligations, resolve disputes and enforce of our agreements.

Section 9 Your Personal Information Choices

We understand that your personal information is important to you, and that is why you have choices in how your personal information is used and shared.

For example, you can:

- (1) Update, access, correct, delete or erase your information.
- (2) Receive a copy of your information.
- (3) Restrict or object the processing of your information.

(4) Withdraw any consent you previously gave to the processing of your information.

Section 10 Protection of Personal Information

We are committed to securing your personal information. We take appropriate technological and organizational measures to help protect your personal information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We comply with applicable data protection, privacy, and security breach notification laws.

Section 11 Contact Us

Please email davidxie@xingyuantechnology.com if you have questions about this Privacy Notice or have a concern about our handling of your personal information.