

# Privacy Policy

Posted and Effective Date: [2025/07/21]

[Liang Hongjin] (“we”, “us”, or “our” ) is committed to protecting the privacy of our users. We strive to provide a safe, secure user experience. This Privacy Policy sets forth the online data collection and usage policies and practices that apply to our [Ocean Tides] (“App” or “Service”).

We may update this Policy periodically to account for changes in our collection and/or processing of personal data, and will post the updated Policy on this page, with a “Posted and Effective Date” at the top of this page.

## **1. Use of personal data**

In general, we may collect, use and disclose your personal data for the following purposes:

- Ø to provide you with the Services that have been requested.

Ø to help enhance the Services, including analyze current user needs and identifying potential future needs.

Ø to communicate and respond to your queries, requests and complaints.

Ø to handle disputes and complaints and conduct and facilitate investigations and proceedings when required.

Ø to protect and enforce our contractual and legal rights and obligations.

Ø to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

## **2. Personal data we collect**

It may include:

Ø the type, version, brand, language and operating system of device.

Ø behavioral usage of the App.

Ø device identifiers (such as IDFA, IDFV for Android, GAID for IOS).

Ø the type and operator of network (such as Mac address).

Ø email address.

### **3. Whom may we disclose the personal data to**

Your personal data may be disclosed to the following third parties:

- Ø other divisions, business units or entities within our group.
- Ø agents, contractors, sub-contractors and third party service providers contracted by us to provide administrative, financial, research, operational or other services.
- Ø our professional advisors such as our auditors and lawyers.
- Ø relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority.

### **4. Your privacy rights**

Under some laws, you may have a right to:

- Ø Access the categories and specific pieces of personal data we have collected and obtain the personal data in a portable and, to the extent technically feasible, readily usable format.
- Ø Delete personal data under certain circumstances.
- Ø Correct personal data under certain circumstances; and

Ø Withdraw your consent.

## **5. How long do we store personal data**

We store or retain personal data for as long as required to engage in the uses described in this Policy, unless a longer retention period is required by applicable law.

## **6. What safeguards are in place to protect your personal data**

We take steps to ensure that your information is treated securely and in accordance with this Policy, to help protect your information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. We use industry-standard physical, procedural and electronic security measures, including encryption where deemed appropriate in order to protect your personal information held with us and third parties we work with.

## **7. Third-Party websites/applications**

The App may contain links to other websites/applications and other websites/applications may reference or link to this App. These third-party services are not controlled by us. We encourage you to read the privacy

policies of each website and application with which you interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Ø Mintegral: <https://www.mintegral.com/cn/privacy>

Ø Google AdMob & Firebase: <https://policies.google.com/privacy>

Ø Pangle: <https://www.pangleglobal.com/zh/privacy/partner-en>

Ø Facebook:

[https://www.facebook.com/privacy/policy/?entry\\_point=comet\\_dropdown](https://www.facebook.com/privacy/policy/?entry_point=comet_dropdown)

Ø Appsflyer: <https://www.appsflyer.com/legal/privacy-policy/>

Ø Applovin Max: <https://www.applovin.com/privacy/>

## **8. Children**

The App is designed for a general audience and not directed to children under 13 years old so we do not knowingly collect personal information from children. If you find that your child has provided us with personal information without your consent, you may contact us. If we find that we have collected a child's personal information in violation of applicable law,

we will promptly take steps to delete such information and terminate the child's access.

## **9. Contact information**

If you have any questions about this Policy, please contact us at [18378524098@163.com]. We will make every effort to resolve your concerns.