

## Privacy Policy

Last updated: February 20, 2021

Xingye (Hainan) Technology Co., Ltd.(“we”, “our” or “us”) understands the importance of protecting your privacy. Therefore, we have established the Privacy Policy to explain how we treat your information and protect your privacy when you use this software(“Software”) and services this Software provided (“Service”) and the rights and options available to you regarding your information. This Privacy Policy does not apply to any third-party websites, services, or applications, even if they are accessible through our Services. Any information that we collect is subject to the Privacy Policy in effect at the time that information is collected. **If you do not agree with the terms and conditions set forth herein, please do not use this Software and Service.**

We reserve the right to modify the terms of this Privacy Policy regarding the updates of the Software. You can check the modified version of this Privacy Policy from the Software. You understand and agree that if you continuously use the Software after the date on which these terms have changed, we will treat your use as acceptance and compliance with the updated terms.

### 1. Information We Collect and Purposes of Collection

There are two general categories of information we will process:

#### 1.1 Information that You Submit

To use some of the functionality of the Software, you may voluntarily permit us to access to the camera or photo album to obtain photos in your mobile device. We access to your camera and photo album only if you confirm the permission. When you use the Palm Scanner/Gender Challenge/Baby Prediction/Younger Shutter/Aging Shutter in the Software, we will capture the position and shape of the five sense organs in the photos, analyze the facial features information, and feedback the effect drawing or conclusion to you. For such photos, facial features information, effect drawing, conclusion, and feedback result, we will neither store nor share them with any third parties after analysis. Please do not require this Software to process content that may directly or indirectly disclose any personal information.

Our purpose of access to the camera is to utilize the functionality of the camera to take photos by following your instruction.

Our purpose of access to the photo album is to recognize the position and shape of the five sense organs in a photo you selected by following your instruction.

#### 1.2 Information that is Processed Automatically

We may use SDK provided by third-party (such as “AppsFlyer”) to collect the technical information from your browser or device when you visit our Service. This information could include the type, name, and version of operating system:(i) Your configuration and settings of the Software and Services, version of the Software and

Services; (ii)ISP (Internet Service Provider), Internet protocol (IP) address, Media Access Control (MAC) address, anonymous user identifiers, device configuration, and identifiers; (iii)Advertising ID ; (iv) location; (v) Apple ID.

We may use API provided by third-party (such as “In-App Purchases in App Store Connect”) to collect information about your subscription orders, such as purchase items, subscription time, order status, payment time. We do not collect and we are not responsible for the collection or security of payment details. Payment information is processed and stored using third-party companies (such as Apple Inc.). These companies can be contacted through their websites. Before entering your personal payment details, we suggest that you read and become familiar with the privacy policy of these third-party companies.

We may use API provided by Apple to collect your current region and preferred language.

The purposes of the information that processed automatically are: (i) to operate and update the Software and the Service, and provide you with existing and new functionality and features; (ii) to improve and customize the Software and the Service; (iii) to maintain, test, monitor and improve the quality and operation of the Software and the Service.

While it is not our intention to collect any personally identifiable information (“PII”) (except for those outlined in this Privacy Policy), the data collected may still include PII. As part of our privacy measures, we implement certain rules designed to avoid the unintentional collection of PII such as email addresses, social security numbers, credit card numbers, etc. Such rules are based on known field types, parameters, values, and algorithms but they are not foolproof and hence the Software and Services may sometimes, unintentionally, collect unwanted information. We regularly examine and update these rules to avoid this happened.

You may withdraw your consent at any time by contacting us.

## **2. Sharing Information with Third-Parties**

We will not share any information that we have collected except for the following events:

2.1 If we are required by law to disclose, we may share information with law enforcement or other competent authorities and any third party, as may be required (e.g., to detect, prevent or otherwise address fraud, security, or technical issues; to respond to claims or satisfy any legal process, subpoena, or governmental request; or to protect the rights, property, or personal safety of our users, its partners, or the general public).

2.2 In the event we go through a business transition such as a merger or acquisition by another company, consolidation, change of control, reorganization, or sale of all or a portion of its assets, your information will be among the assets transferred.

2.3 We may share information with certain third parties (including, without limitation, search engines, content providers, and advertising networks and platforms) that provide various services (such as advertising, marketing, analysis, content, and search) in connection with the Software and the Service. We take appropriate measures to ensure that no user can be individually identified from the disclosure of such information, and we

require these third parties (i) to keep the data secured, (ii) not to use the data for any other purpose other than to provide us with the Service; and (iii) to use the data solely in compliance with the applicable data protection laws and this Privacy Policy.

2.4 We may also share non-personally identifiable information with our subsidiaries, affiliated and parent companies but their use of such information must comply with the applicable data protection laws and this Privacy Policy.

### **3. Information may be collected by Third-Party**

Certain Services may contain contents linking to advertisements, websites, products, and other services provided by third parties in our Software (collectively, "Third-Party Services"). The use of such Third-Party Services is subject to their privacy policies. You shall be aware that the use of the Third-Party Services may give these third parties the ability to access, collect, store, and/or share your information, both your PII and non-personally identifiable information. To clarify, we do not review, approve, monitor, endorse, warrant, or make any representations concerning such Third-Party Services and your access to any Third-Party Services is at your own risk. We are not responsible for the information contained and/or made available through, the practices of, or your use or inability to use such Third-Party Services. You expressly relieve us from any liability arising from your use of such Third-Party Services. We recommended that you read the terms, conditions, and privacy policies of such third party before using or accessing any of them.

Moreover, for providing customized advertisement, the Third-Party advertising companies may collect or use your PII (not including your name, address, email address, or telephone number) when you use the Software or the Service. If you would like more information about this practice and to know your choices about not using this function or sharing this information with these companies, please contact the Third-Party advertising companies directly.

### **4. Transfer of Data**

The Software and the Services work over the Internet. We may store and process information in various locations throughout the world. We and third-party organizations that provide automatic data processing technologies for the Software or our third-party advertising partners may transfer the automatically processed information across borders and from your country or jurisdiction to other countries or jurisdictions around the world.

### **5. Security of Your Information**

The security of your information is our utmost priority, and we take strict measures to protect the data from unauthorized access, use, disclosure, or destruction of data. We have implemented physical, technical, and administrative security measures for the Services that comply with applicable laws and industry standards. For example, we use firewalls, encryption technology, and Network access designed to protect against fraud and

identity theft; our data is only stored in centers that provide high-level security for user's information. We also protect the user's privacy by seeking to minimize the amount of sensitive data and PII. We also seek appropriate contractual protection from our partners regarding their treatment of user data. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

## **6. Data Retention**

We retain the information we collect as described in this Privacy Policy for as necessary for the provision of the Services, internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements (e.g., settlement). The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide the Services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for litigation or disputes).

## **7. Your Data Rights**

You have the right to access, modify, correct, or delete any personal data which may have collected. If you are in the EEA, you have a right to (subject to a limited number of exceptions): (i) request access to and rectification or erasure of your personal information; (ii) obtain restriction of processing or to object to the processing of your personal information; and (iii) ask for a copy of your personal information to be provided in a digital format. You also have the right to complain about the processing of your personal information with your local data protection authority in the EEA. To exercise this right please contact our Data Protection Officer by email displayed below.

## **8. Children's Privacy**

The Software is not intended for children under the age of 16 or other statutory minimum age according to the applicable laws and regulations in your country (the "Minimum Age"). Therefore, we do not knowingly collect or solicit any personal information from children under the Minimum Age. No one under the Minimum Age may provide any personal information to the Software. If you are under the Minimum Age, do not use or provide any information on this Software or through any of its features. Do not provide any information about yourself, including your email address. If we learn that we have collected personal information from a child under the Minimum Age without verification of parental consent, we will erase that information as quickly as possible. If you believe that we might have any information from or about a child under the Minimum Age, please contact us through the email displayed below.

## **9. Contact us**

Any questions or concerns, please feel free to contact us by [[knowuhelp@gmail.com](mailto:knowuhelp@gmail.com)]