

《dfox Privacy Policy》

Last Updated: Nov 24, 2021.

Dear Users,

dfox Foundation Ltd. & PTS Global(Hongkong)Limited(“PTS” or “dfox” or “we”) respects and protects the privacy of users (“you” or “Users”). dfox will collect and use your Personal Information, generated from your use of dfox following this Privacy Policy (“Policy”).

dfox & PTS recommends that you shall carefully read and understand the whole contents of this Policy before your use of the product (“dfox”). Additionally, significant information including the Disclaimer is in the bold form in this Policy. Definitions of keywords in this Policy are consistent with those in the dfox Term of Use of dfox.

dfox reserves the right to update this Policy online from time to time, and the new policy will immediately replace the older one once posted. In particular, if you do not accept the revised policies, please immediately stop your use of dfox. Your continuous use of dfox will be regarded as your acceptance of the revised policy. Furthermore, the revised policies will take into effect immediately upon being posted on dfox.

You acknowledge and accept that this Policy and other relevant rules apply to dfox and the DApps owned by dfox on dfox.

Information We Collect

We collect your information to provide the services you requested on dfox, and we highly value the protection of your privacy. We strictly abide by the principle of “lawful, justifiable, and necessary” during our collection of your information. You acknowledge that, if you do not provide us with the necessary information, your user experiences on dfox may be influenced.

We may collect your Personal Information, including but not limited to your device information, operation records, transaction records, and wallet addresses.

1.1 To satisfy your needs for specific services, we may collect your name, bank card number, telephone number (Mobile phone number registration method), email address (Email registration method), etc.

1.2 You confirm that your Wallet Password, Private Key, Mnemonic Words, Keystore on dfox (the decentralized solution) are not stored or synchronized on dfox' servers. dfox does not offer the service to restore your Wallet Password, Private Key, Mnemonic Words, or Keystore.

1.3 Apart from the foregoing provisions, when you are using a specific function of dfox, we may give you a special notification to ask for more Personal Information.

1.4 After you link to the third-party-developed DApps from dfox, your Personal Information will be collected and held by the third-party-developed DApps instead of being collected or held by dfox. When you fill in your Personal Information on a third-party-developed DApp, you should pay attention to the Terms of Use and Privacy Policy of the third-party-developed DApp. We are not accountable for any losses caused by your operation on the third-party-developed DApp.

1.5 To the extent permitted by laws and regulations, dfox may collect and use the following Personal Information without your prior consent or authorization:

- a. information related to national security and national defense;
- b. information related to public security, public health, significant public interests;
- c. information related to the criminal investigation, prosecution, trial, and enforcement;
- d. the Personal Information collected is publicized by yourself;
- e. the Personal Information is collected from legally publicly disclosed information, such as legal news reports, government information disclosure, and other channels;
- f. the Personal Information is necessary to maintain the security and compliance of services, such as to detect or to solve the malfunction of products and services;
- g. other circumstances prescribed by laws and regulations. We collect information in the following ways:

1). Information you give us. For example, you fill in your name, telephone number, or bank card number in the "My Account" column or you provide your email address when submitting feedbacks, or you give extra information to us when you use our specific services.

2). we collect information during your use of dfox, including your device's information and your operation records on dfox, etc.

h.Transaction information, such details about purchases you make through the Service and billing details;

i.Usage information, such as information about how you use the Service and interact with us;

j.Marketing information, such as your preferences for receiving marketing communications and details about how you engage with them;

How We Use Your Information

2.1 We may associate you with your wallet by the unique serial number of your device.

2.2 We may promptly push important notifications to you, such as software updates, updates of Term of Use, and this Policy.

2.3 We offer you the “Scan code to log in” option in the “Settings” column of dfox to provide you with a convenient and safe way to manage your digital Tokens.

2.4 We deal with your feedback by using the Wallet Address and the device information provided by you.

2.5 We may collect your Personal Information to conduct our internal audit, data analysis, and research, etc. to enhance our services.

2.6 According to dfox Term of Use and other rules of dfox, dfox will manage and handle the use behaviors of Users through Users’ information.

2.7 We may use your information following laws, regulations and cooperate with regulatory authorities.

How You Control Your Information

You are entitled to control your Personal Information provided to dfox:

3.1 You may import your other wallets into dfox through synchronization of wallets and you may export your wallets from dfox to other Tokens management wallets.

3.2 dfox will display the information of imported wallets to you. You may add or delete Tokens, transfer and collect Tokens using the “Assets” column.

3.3 You understand that you may handle the following operations in the “Me” column on dfox: a. in the “Address Book” column, you may view and edit your “Contacts”; b. in the “Settings” column, you may choose not to open “Default wallet”, which means you can connect to dfox first c. in the “Profile” column, you do not have to provide your name, telephone number, bank card number information. But if you wish to use specific services, you may need to provide the foregoing information; d. in the “Help” column, you may submit any questions or suggestions for dfox at any time. We are glad to communicate with you to improve our services.

3.4 When we collect information from you for a specific purpose, we will ask for your consent in advance to which you are entitled to refuse. However, you understand that when you refuse to give such consent, you also give up the choice to use specific services provided by dfox.

3.5 You acknowledge that since blockchain is an open-source system, your transaction records are automatically public and transparent in the whole blockchain.

3.6 You understand that after you link to the third-party-developed DApps from dfox, the dfox Term of Use and dfox Privacy Policy will no longer apply. You are encouraged to carefully review its privacy policies and related terms of service before you start to use the third-party-developed DApps.

3.7 You are entitled to ask us to update, revise, and delete your relevant information.

3.8 We reserve the right to collect your information without your prior authorization or consent according to Article 7 of Section 1 of this Policy.

Information We may Share or Transfer

4.1 The Personal Information collected by dfox for business and legal purposes

4.2 Personal Information will not be sold, traded, or transferred to third parties without your consent.

4.3 Personal Information may be disclosed to these entities if you agree to our disclosure of the personal information to strategic partners or related parties. These entities will only use your personal information for the purposes you have agreed to.

4.4 You agree that we may disclose or share your personal information to the following third parties: a. service providers and data processors who represent us and provide services to us, such as KYC inspections, accounting, data processing or management services, website hosting, maintenance and operation services, mail information services, analysis services, and payment transaction processing, marketing, etc.; b. dfox consultants and professional consultants (such as accountants, lawyers, auditors).

4.5 Personal Information may be transferred to any other country for the above-mentioned purposes. dfox will obtain your consent and ensure that the recipient of personal information has the same level of personal information protection measures as dfox. If there is no personal information protection law applicable to the relationship between dfox and you in these countries or regions, we will sign a legally enforceable agreement with the receivers of personal information.

4.6 dfox will not share with or transfer your Personal Information to any third party without your prior consent, except for the following circumstances:

- a. the collected Personal Information is publicized by yourself;
- b. the Personal Information is collected from public information which was legally disclosed, such as news (lawfully reported), government information disclosure, and other channels;
- c. we may share your Personal Information with our affiliates only when necessary and to the extent permitted by this Policy;
- d. to abide by applicable laws, regulations, legal procedures, and administrative or judiciary authorities, dfox will provide or implement this Policy to protect our or other parties' rights, assets, or security;
- e. in the case of mergers and acquisitions, if a transfer of Personal Information is involved, dfox may require the receivers of Personal Information to be continuously bound by this Policy.

How We Collect Data Automatically

5.1 We use automatic data collection technology in the application. E.g:

a. cookies (or browser cookies). Cookies are small text files set by the operator of a website or application to identify your browser or device. We may use cookies on our apps to store and track information, such as the number and frequency of use of users, user distribution, and users' online preferences. Cookies do not capture information that can identify you, but the information they collect can help us analyze the usage of the application to improve your experience. You can turn off cookies in your browser settings. However, this may affect the functionality of the application.

b. network analysis. Web analytics is a method of collecting and evaluating the operation of visitors to web pages and applications. This includes analyzing traffic patterns, such as determining the frequency of visits to certain functions of a website or application or understanding the information or services that visitors are most interested in. We use network analysis services provided by third-party tools.

How We Protect Your Information

6.1 If dfox terminates operation, dfox will stop the collection of your Personal Information in time, post the announcement on dfox and delete or anonymize your Personal Information held by us within a reasonable period.

6.2 To protect your Personal Information, dfox may adopt data security techniques, improve internal compliance levels, provide security training for our staff, and set security authority for access to relevant data to protect your Personal Information.

6.3 We will send you messages about information security in the “Wallet Guide” column and update articles concerning the use of wallets and information protection in the “Wallet Guide” column on dfox for your reference.

Protection for the Minors

The following special provisions apply to minors who are under the age of 18 years old:

7.1 The minors shall not use dfox without guidance from their parents or guardians.

7.2 The parents and guardians of the minors shall guide the minors on using dfox after they read this Policy, dfox Term of Use, and other relevant rules.

7.3 dfox will ensure the confidentiality and security of the minors' Personal Information in accordance with national laws and regulations.

Disclaimer

8.1 After you link to the third-party-developed DApps from dfox, the privacy policies of the third-party-developed DApps will apply. The collection and use of your Personal Information by the third-party-developed DApps will be controlled neither by dfox, nor by this Policy.

8.2 You shall carefully select and use the third-party-developed DApps and protect your Personal Information. dfox shall not be held liable for the privacy protection obligation of any third-party-developed DApps.

8.3 You acknowledge and accept that, to the maximum extent permitted by applicable law, dfox will adopt measures as reasonable as possible to protect your Personal Information under current techniques on an “as is”, “as available” and “with all faults” basis, to avoid the disclosure, tampering or damage of information. since dfox transfers data wirelessly, dfox makes no guarantee on the privacy and security of wireless internet data transferring.

Miscellaneous

9.1 As a company that provides services to you, we will not actively provide your Personal Information to third parties other than the agreement, unless we obtain your consent and inform the other party's identity, contact information, the processing purpose, processing method, etc. If there is a service demand of processing your personal sensitive information in the future, we will ask your opinions once again, and use them after obtaining your consent.

9.2 If you are a user outside of Singapore, you shall fully understand and conform to the laws, regulations, and rules in your jurisdictions that are relevant to the use of dfox.

9.3 During your use of dfox services, if you come across any problems related to your Personal Information use, you may contact us through the submission of your feedbacks on dfox.

9.4 You may access this Policy and other service rules of dfox on dfox. We encourage you to check the Term of Use and Privacy Policy of dfox each time you log into dfox.

9.5 This English version and other translated versions of this Policy are provided for the convenience of Users and are not intended to revise the original Chinese version of this Policy. If there is any discrepancy between the Chinese version and the non-Chinese version of this Policy, the Chinese version shall prevail.

This Policy shall become effective on Nov 24, 2021.

As for any issues not covered in this Policy, you shall comply with the announcements and relevant rules as updated by dfox from time to time.

