**Privacy Policy**

**Thank you for choosing our products and services!**

We fully understand the importance of your personal data and value your trust. We will strictly comply with laws and regulations, taking necessary security measures to protect your personal data and ensure its privacy.

If you are a registered user of the platform (ZONDEX) - the platform service provider (hereinafter "we") has developed this Privacy Policy to help you understand: How we collect, use, disclose, transfer, store and protect your personal data.

Before you start using our products and services, please read this Privacy Policy carefully. Pay particular attention to the items in bold or underlined to ensure that you fully understand and agree to its provisions.

**Additional information:**

In some cases, we may notify you about the purposes of data collection, its scope and methods of use through pop-up windows, instructions on the site or descriptions of feature updates. All such notices are an integral part of the Policy and have the same legal force as it.

**Explanation of terms:**

We strive to explain professional terms in simple and understandable language to facilitate your understanding.

**Your questions and suggestions:**

If you have any questions, comments or suggestions regarding the content of the Policy, you can contact us using the contact information provided at the end of the document.

Your consent:

By using our products and services, you confirm that you are familiar with the functions we offer and understand what personal data is necessary for their operation.

You also agree to the collection, processing, use and disclosure of your personal data within the specified purposes.

**Additional Features:**

Your consent to the Policy does not automatically mean your consent to the use of additional features or the processing of optional data. If such features or data are required, we will ask for your separate consent.

To provide additional features (e.g. personalized recommendations or improved service). You can refuse to provide data for such features, but this may limit their use.

**1. Limitation of the Policy:**

This Privacy Policy only governs the services provided by us (the ZONDEX platform).

**2. Collection and Use of Data:**

While using our products and services, we may collect and use your personal data for the following purposes;

**Basic Features:**

To provide the basic features of our products and services, as well as to comply with legal obligations.

If you refuse to provide the necessary data, you will not be able to use our services to the fullest extent.

**3. Your Consent:**

Your consent is not required for the collection and processing of data required for basic features, as it is necessary for the operation of the service.

For additional features, we ask for your separate consent.

Collection, processing, use and disclosure of personal data

1- Basic provisions:

We collect and use your personal data to provide you with our products and services. The scope and categories of data depend on the features you use. For example:

For basic features (registration, login, use of services), we collect the minimum necessary data.

For additional features (personalization, service improvement), we ask for your separate consent.

2- What data do we collect?

Minimum data for registration: mobile phone number,

Additional data (with your consent):

Contact information (e.g. landline phone, email).

Professional data (job title, field of activity).

**Additional purposes:**

Personalization of services (e.g. recommendations, special offers).

Improving the quality of products and services.

**4. Sensitive data:**

In some cases, we may collect data that is considered sensitive by law (e.g. passport data, payment card information, tax information). Additional protections apply to such data, and you may have additional rights.

Rationale:

We strive to strike a balance between providing quality services and protecting your privacy. All actions with your data are carried out in accordance with the law and only for the stated purposes.

**Verification purposes:**

Fraud prevention.

Tax compliance.

Protection of minors.

Know your customer (KYC) verification to combat money laundering.

**Use of browsing, search and personalized recommendations:**

**1. Browsing**

We collect data about your actions on the platform (e.g. browsing products) to improve your experience.

This data helps us show you relevant products and services.

**2. Search**

When you use the search function, we save your queries to improve your search results and offer you more relevant products.

**3. Personalized recommendations**

Based on your actions (browsing, searching, shopping), we offer personalized recommendations.

**Checkout:**

To place an order, you need to provide:

* Recipient's name and contact number.
* Delivery address.
* Additional information (e.g. ID details for customs clearance for international orders).

**You can also provide:**

* Alternative contact number.
* Convenient delivery time.
* Billing details (invoice name, VAT number, email).

**Order information:**

The order includes:

* List of products/services.
* Order number.
* Time of checkout.
* Amount to be paid.
* Your notes.

**Purchases for other people:**

If you order goods for another person, you need to provide their details and make sure that they agree to the processing of this data.

**Purposes of data collection:**

We use your data to:

* Complete transactions.
* Ensure security.
* Facilitate order inquiries.
* Provide customer support and after-sales service.

We are committed to making continuous efforts to improve the quality of our customer service based on historical data about your use of such services. Customer service and dispute resolution

We collect data about your customer service interactions (e.g., correspondence history, order inquiries) to promptly resolve issues.

This data helps us improve the quality of service and prevent fraud.

Sharing information link for the purposes of functions or services such as navigation, sharing and event linking, provided that we will download locally identified content from your clipboard to our servers only if and to the extent that such content is navigation, sharing, event linking and other instructions in connection with the ZONDEX Platform, and undertake not to collect or store other information from your clipboard. Such separate information from the clipboard cannot identify you. In order to comply with our legal obligations to ensure the security of e-commerce transactions, to enhance the security of using the services provided by us and our Affiliates and partners, to ensure personal, property, account and transaction security for you and other users or the public, to effectively prevent phishing websites, fraud, network vulnerabilities, computer viruses, the risks of cyber attacks and intrusions, and to more accurately detect violations of laws or regulations, violations of agreements with the ZONDEX Platform or the rules of its use, we will collect your Device Information and Service Log Information using the application security software development kit (SDK) built into our applications, which is developed by our Affiliates, and may use or combine your membership information, transaction information, Device Information, Service Log Information and information reported by our Affiliates and partners, with your consent or as required by law (we have the right to collect MAC address information during the application run in the background, IMEI and other device identifiers for risk identification) to comprehensively assess the risks associated with your account and transactions, verify your identity, detect and prevent security incidents and take necessary measures for registration, audit, analysis and processing in accordance with the law. In order to provide you with products and/or services that are more convenient, high-quality and customized, as well as to improve the quality of service to you, we may collect,

Providing guarantees for you & Providing you with additional services. If you refuse to provide such permissions, you will still be able to use the basic services provided by the ZONDEX Platform, but such additional services will not be available to you. You may, at your sole discretion, grant or revoke such permissions at any time. Please note that by providing any of such permissions, you consent to the collection, processing, use and/or disclosure of your relevant Personal Data to provide you with the relevant services; and by revoking any such permission, you revoke your relevant consent, in which case we will cease collecting, processing, using and/or disclosing the relevant Personal Data and will no longer be able to provide you with the services for which such permission was provided.However, your decision to withdraw any such consent will not affect any prior collection, processing or use of your Personal Data with your consent. Cookies and similar device identification technologies are widely used on the Internet. When you use our services, we may, through appropriate technologies, send one or more cookies or anonymous identifiers (each a “Cookie”) to your device to collect, identify and store information about your access to and use of our services. We will not use cookies for any purpose other than as described in this Privacy Policy. We use cookies primarily to ensure the secure and efficient operation of our products and services. Cookies allow us to verify the security of your account and transactions, and to troubleshoot problems to identify crashes, delays and other anomalies, and to help you avoid having to re-enter forms and search content. We may also use cookies to show you information or features that may be of interest to you and to optimize the advertisements that are shown to you. Most browsers allow users to clear their browser cache. You can clear your browser cache or change your cookie acceptance level or reject our cookies accordingly. However, doing so may prevent you from using the services or features that rely on cookies. By accepting cookies, you consent to the collection, processing, use and/or disclosure of your Personal Data using cookies for the above purposes. If the information you provide contains any Personal Data of other users, you must ensure that you have obtained their permission before providing us with such Personal Data. We will first seek your consent before collecting, processing, using and/or disclosing your Personal Data for any purpose not specified in this Policy, and before collecting, processing, using and/or disclosing your Personal Data collected for a specific purpose for any other purpose.

In cooperation with our partners, we adhere to the following principles: 1) The principles of lawfulness, legitimacy and minimum necessity: Personal data must be processed lawfully, for legitimate purposes and to the minimum extent necessary to achieve such purposes. 2) The principle of maximum guarantee of the user's right to receive information and the right to make a decision: During the processing of Personal Data, the user's right to receive information and the right to make a decision about the processing of his/her Personal Data will be fully respected. 3) The principle of maximum security: We take appropriate measures to ensure the security of the Personal Data processed, carefully assess the purposes for which our partners use Personal Data, conduct a comprehensive assessment of the security capabilities of such partners and require them to comply with the applicable cooperation agreement.

Other cooperation options In addition to the cooperation options described above, we may entrust information to other partners who support our business, including those whom we trust to provide technological infrastructure services, analyze the methods of use of our services, or provide membership services in retail chains or other services to customers. To ensure that our applications and features operate smoothly and that you can benefit from even more services and features, authorized partners’ SDKs or other similar tools will be embedded in our applications. We conduct rigorous security reviews of the APIs and SDKs used by each authorized partner to obtain information and agree with each authorized partner to have strict safeguards in place to protect Personal Data and require them to process Personal Data in accordance with this Policy and any other applicable privacy and security measures, unless such partner obtains separate consent from you. If we need to transfer Personal Data in connection with a merger, divestiture, dissolution or bankruptcy, we will provide you with the name and contact information of the recipient, who will continue to comply with this Policy and other legal obligations. If the recipient intends to change the original purposes or methods of processing, it will ask you again for consent.

**Sharing:**

We will not publicly disclose your Personal Data, except that: 1. we may disclose your Personal Data at your discretion or otherwise with your separate consent; or 2. if we determine that you have violated laws or regulations, or have materially breached any agreements with the ZONDEX Platform or the ZONDEX Platform policies, or in order to protect users of the ZONDEX Platform or the general public from a breach of their personal safety or property, we may publicly disclose your Personal Data, including your breach and the action taken by the ZONDEX Platform against you. If we discontinue our products and/or services, we will promptly stop collecting, using and/or disclosing your Personal Data. We will notify you of such discontinuance by a separate notice or announcement, and we will delete or anonymize your Personal Data in our possession in connection with the discontinued products and/or services. You may access and control your information in the following ways, and we undertake to respond to your requests in accordance with applicable laws and regulations: You have the right to access, correct and supplement your information in the following ways:

If we have collected and processed your Personal Data with your consent, you may change the scope of or withdraw your consent to us collecting and processing Personal Data by contacting our customer support staff. However, please note that for certain categories of Personal Data, such as those necessary to perform the core functions of the ZONDEX Platform or to enable us to fulfill our obligations under laws and regulations, we may not be able to respond to your request to change the scope of consent. Once you withdraw your consent, we will no longer process the relevant Personal Data; provided that your decision to withdraw your consent will not affect the processing of Personal Data previously carried out by us in accordance with your consent.

**Right of access to data:**

You can request information about what personal data we collect about you, how it is used and with whom it is shared.

Right to erasure of data:

You can request that your personal data be erased, unless retention is necessary to comply with a legal obligation.

**Right to rectification:**

If your data is incorrect or out of date, you can ask that it be updated or corrected.

Right to restriction of processing:

You can request that we restrict the use of your data, for example for marketing purposes.

Right to object to tracking:

You can object to tracking of your activity on the website, although we do not currently support the “do not track” feature in browsers.

Right to non-discrimination:

Exercising your rights will not affect the accessibility or quality of our services.

How to exercise your rights?

You can submit a request via our customer service.

If you wish to appoint a representative (agent) to submit the request on your behalf, the agent must provide proof of their authority.

We undertake to respond to your request within 10 days, unless otherwise required by law.

Important information

We do not sell or transfer your personal data to third parties for the purposes of behavioural advertising.

Your data is used only to provide valve-related services and to improve the quality of service.

Responding to your requests specified above.

To ensure the security of your account and your Personal Data, when you contact us with any request specified above, we may verify your identity (for example, by authenticating your account, asking you to provide a written request, or other appropriate means) before processing your request. In general, we will not charge any fee for your reasonable requests, but we will charge, depending on the circumstances, a fee for any repeated request that exceeds reasonable limits, in accordance with applicable law. We may refuse any request in accordance with applicable law, for example, if it relates to information that is not directly related to your identity, is repetitive without a valid reason, requires excessive technical support (for example, to develop a new system or fundamentally change existing practices), may create risks to the legitimate rights and interests of others, or if it is impracticable. We will retain your Personal Data only for as long as necessary to fulfill the purposes set out in this Policy, unless otherwise mandatory required by law. In addition, we may retain your Personal Data (or Sensitive Personal Data, if any) for a longer period (including after you cease to be a user) where this is necessary to comply with laws and regulations applicable to us. The criteria we use to determine the appropriate retention periods are: 1. the various legal requirements to which we are subject; 2. in the event of legal action against us to which your Personal Data may be relevant; 3. whether your Personal Data is necessary for us to provide the services; 4. the type, nature, and sensitivity of the Personal Data we process about you; and 5. the lawful basis for processing your Personal Data, such as consent, legitimate interests, or otherwise. Upon expiry of the retention period, we will delete or anonymize your Personal Data in accordance with applicable laws. In connection with the provision of services through the ZONDEX Platform, we will store your Personal Data in the infrastructure of a cloud service provider. There will also be international transfers of your Personal Data between countries/regions where service providers engaged for purposes such as fulfilling your order are located.These countries/regions have laws protecting Personal Data that may differ from the laws of your country. We ensure that any such international transfers will only be made for legitimate purposes and on lawful grounds or as otherwise permitted by applicable law. We take appropriate steps to ensure that recipients of your Personal Data are bound by confidentiality obligations and implement appropriate measures to ensure that your Personal Data remains protected in accordance with this Privacy Policy, such as standard contractual clauses or other mechanisms required by applicable law. You hereby consent to the cross-border transfer of your Personal Data to any country, including the People's Republic of China. If the relevant jurisdiction requires that your Personal Data be stored in your country of residence or elsewhere, we will ensure that such Personal Data is localized in accordance with applicable law. We have taken reasonable and practical security measures in line with industry standards to protect your information and prevent unauthorized access, collection, disclosure, copying, use or modification, deletion, damage, loss or similar risks to your Personal Data, as well as the loss of any media or device on which the Personal Data is stored. For example, we use encryption to enhance the security of Personal Data, protect data transmission between your browser and the server with SSL encryption and provide access to the HTTPS protocol for secure browsing; we also use a reliable protection mechanism to protect Personal Data from malicious attacks; to the maximum extent possible, we implement an access control mechanism so that access to Personal Data is provided only to authorized personnel. Currently, our key information system has been assessed for classified protection in the field of cybersecurity and has a rating of level 3 or higher. We have implemented an industry-leading, data-centric, lifecycle-based Personal Data security management system that enhances the security of Personal Data in terms of organizational structure, system design, human resources management, and product technology. We have established a dedicated Personal Data protection working group. We conduct training and exams to raise awareness among our employees about the importance of protecting Personal Data. If our physical, technical or organizational security measures are compromised, resulting in unauthorized access, collection, use, disclosure, copying, modification or deletion of, or damage to, your information, or the loss of any storage medium or device on which Personal Data is stored, in circumstances where there is a likelihood of unauthorized access, collection, use, disclosure, copying, modification or deletion of your Personal Data or damage to your legitimate rights or interests, we undertake to promptly develop a contingency plan and take reasonable and appropriate measures to minimize the impact on you.In the event of any incident related to the security of Personal Data, we undertake to notify you, to the extent necessary and where required by law and regulation, of the main provisions and potential consequences of such an incident, the countermeasures we have taken or will take, suggestions on how you can prevent or mitigate risks yourself, as well as the legal remedies you can take. We will notify you by SMS, phone call, pop-up notification and other available channels. In the event that it is difficult to notify each user individually, we will publish a notice in an accessible and effective manner. In addition, we undertake to communicate how incidents related to the security of Personal Data are handled in accordance with the requirements of regulatory authorities. When you conduct online transactions through the ZONDEX Platform services, you inevitably have to disclose your Personal Data, such as contact information or contact address, to your counterparty or potential counterparty. You may also use our services to communicate or exchange information or analytics with third parties. You should protect your Personal Data properly and provide it to others only when and to the extent necessary and never trust any other trading tools to avoid information theft or possible telecommunications/Internet fraud. If you suspect any breach of your Personal Data, in particular your account or password, please contact our customer support staff immediately so that we can take appropriate action on your request. In order to provide you with the best products and services, we are constantly working to improve our products, services and technologies. In the event of new services and changes in business processes, we may update our Privacy Policy and notify you of specific changes. We will not limit your rights under this Privacy Policy without your express consent. We undertake to publish any changes made to this Privacy Policy on the relevant web page. For any Material Changes, we will also notify you with a more prominent notice (including a public announcement or pop-up message on the ZONDEX Platform) and seek your consent as required by law. For the purposes of this Policy, a “Material Change” means, without limitation: 1. any material change in the way our services operate, such as the purpose for which Personal Data is processed, the categories of Personal Data we process, and the methods we use to process Personal Data; 2. any change in the ownership of this Privacy Policy as a result of any business adjustment, merger and acquisition, or other transaction, or a change in the original purposes and methods of processing by the new owner; 3. any change in the primary entities to whom Personal Data is transferred or disclosed;

“Personal Data” means any information relating to an identified or identifiable natural person, whether recorded electronically or otherwise, except for Anonymized Information. The ZONDEX Platform Service Provider undertakes to comply with its obligations to protect Personal Data with respect to any data that would be considered Personal Data in certain jurisdictions. “Device Information” includes the hardware model, hardware serial number, software list, list of installed applications, list of installed software, International Mobile Equipment Identity (IMEI), device MAC address, SIM card IMSI information, Android ID, MEID, Open UDID, GUID, Bluetooth information, broadcast component information, ICCID, operator information, sensor information (gyroscope, gravity sensor, acceleration sensor, environment sensor, optical heart rate sensor) and clipboard information actually collected during the provision of the services. “Service Log Information” in relation to you includes your browsing history, click and view history, search history, favourites list, information about products added to your shopping cart, transaction information, after-sales service information, subscription information, communications, posted information, as well as your IP address, browser type, telecommunications service provider, language, date and time of visit, and records of the web pages visited. “Anonymise” means the processing of Personal Data in such a way that the data subject can no longer be identified without additional information, and “Anonymise” or “Anonymised” shall be construed accordingly. “Anonymise” means the processing of Personal Data in such a way that the data subject can no longer be identified and the Personal Data cannot be reconstructed, and “Anonymise” or “Anonymised” shall be construed accordingly. “Mainland China” means the territory of the People’s Republic of China excluding the Hong Kong Special Administrative Region, the Macao Special Administrative Region and the Taiwan Region. "SDK" means software development kit.