

# PRIVACY POLICY

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This Privacy Notice for Wisefin Technology Company Limited.(doing business as Wisefin)("we,""us,"or"our"),describes how and why we might access,collect,store,use,and/or share ("process")your personal information when you use our services ("Services"),including when you:

- Visit our website at [ wisefin-global.com ], or any website of ours that links to this Privacy Notice
- Download and use our mobile application (WiseFin Solution),or any other application of ours that links to this Privacy Notice
- Engage with us in other related ways,including any sales,marketing,or events

Questions or concerns?

Reading this Privacy Notice will help you understand your privacy rights and choices.We are responsible for making decisions about how your personal information is processed.If you do not agree with our policies and practices,please do not use our Services.

## SUMMARY OF KEY POINTS

*This summary provides key points from our Privacy Notice,but you can find out more details about any of these topics by clicking the link following each key point or by using our **table of contents** below to find the section you are looking for.*

### **What personal information do we process?**

When you visit,use,ornavigate our Services,we may process personal information depending on how you interact with us and the Services,the choices you make,and the products and features you use.Learn more about personal information you disclose to us.

### **Do we process any sensitive personal information?**

Some of the information may be considered "special"or "sensitive"in certain jurisdictions,for example your racial or ethnic origins,sexual orientation,and religious beliefs.We do not process sensitive personal information.

### **Do we collect any information from third parties?**

We may collect information from public databases,marketing partners,social media platforms,and other outside sources.Learn more about information collected from other

sources.

### **How do we process your information?**

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about how we process your information.

### **In what situations and with which parties do we share personal information?**

We may share information in specific situations and with specific third parties. Learn more about when and with whom we share your personal information.

### **How do we keep your information safe?**

We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

### **What are your rights?**

Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

### **How do you exercise your rights?**

The easiest way to exercise your rights is by visiting \_\_\_\_\_, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect?

Review the Privacy Notice in full.

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## **1.WHAT INFORMATION DO WE COLLECT?**

Personal information you disclose to us

*In Short:We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you register on the Services,express an interest in obtaining information about us or our products and Services,when you participate in activities on the Services,or otherwise when you contact us.

**Personal Information Provided by You.**The personal information that we collect depends on the context of your interactions with us and the Services,the choices you make,and the products and features you use.The personal information we collect may include the following:

- names
- phone numbers
- email addresses
- job titles
- usernames
- contact or authentication data
- contact preferences
- billing addresses
- debit/credit card numbers

**Sensitive Information.**We do not process sensitive information.

**Application Data.**If you use our application(s),we also may collect the following information if you choose to provide us with access or permission:

- *Geolocation Information.* We may request access or permission to track

location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

### **Information collected from other sources**

***In Short:** We may collect limited data from public databases, marketing partners, and other outside sources.*

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as public databases, joint marketing partners, affiliate programs, data providers, and from other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles, for purposes of targeted advertising and event promotion.

## **2. HOW DO WE PROCESS YOUR INFORMATION?**

***In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.*

**We process your personal information for a variety of reasons, depending on how you interact with our Services, including:**

- **To facilitate account creation and authentication and otherwise manage user accounts.** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To request feedback.** We may process your information when necessary to request feedback and to contact you about your use of our Services.
- **To protect our Services.** We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
- **To identify usage trends.** We may process information about how you use our Services to better understand how they are being used so we can improve them.

- **To save or protect an individual's vital interest.**We may process your information when necessary to save or protect an individual's vital interest,such as to prevent harm.

### **3.WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?**

***In Short:**We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e.,legal basis)to do sounder applicable law,like with your consent,to comply with laws,to provide you with services to enter into or fulfill our contractual obligations,to protect your rights,or to fulfill our legitimate business interests.*

**If you are located in the EU or UK,this section applies to you.**

The General Data Protection Regulation (GDPR)and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information.As such,we may rely on the following legal bases to process your personal information:

- **Consent.**We may process your information if you have given us permission (i.e.,consent)to use your personal information for a specific purpose.You can withdraw your consent at any time.Learn more about withdrawing your consent.
- **Legitimate Interests.**We may process your information when we believe it is reasonably necessary to achieve our legitimate business interests and those interests do not outweigh your interests and fundamental rights and freedoms.For example,we may process your personal information for some of the purposes described in order to:
  - Analyze how our Services are used so we can improve them to engage and retain users
  - Diagnose problems and/or prevent fraudulent activities
  - Understand how our users use our products and services so we can improve user experience
- **Legal Obligations.**We may process your information where we believe it is necessary for compliance with our legal obligations,such as to cooperate with a law enforcement body or regulatory agency,exercise or defend our legal rights,or disclose your information as evidence in litigation in which we are involved.
- **Vital Interests.**We may process your information where we believe it is necessary to protect your vital interests or the vital interests of athird party,such as situations involving potential threats to the safety of any person.If you are located in Canada,this section applies to you.

**If you are located in Canada,this section applies to you.**

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations

#### **4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

***In Short:** We may share information in specific situations described in this section and/or with the following third parties.*

**Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors, or agents ("**third parties**") who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organization apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct.

The third parties we may share personal information with are as follows:

- **Cloud Computing Services**

Microsoft Azure

- **Data Backup and Security**

Google Drive Backup

We also may need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## **5. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:** We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than twenty four (24) months past the termination of the user's account.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **6. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** We aim to protect your personal information through a system of organizational*

*and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## **7. DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:** We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [DPO@wisefin-global.com].

## **8. WHAT ARE YOUR PRIVACY RIGHTS?**

***In Short:** Depending on your state of residence in the US or in some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure, (iii) to restrict the processing of your personal information, (iv) if applicable, to data portability, and (v) not to be subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.



We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority.

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

**Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below or updating your preferences.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

### **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

## **9.CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

California law requires us to let you know how we respond to web browser DNT

signals. Because there currently is not an industry or legal standard for recognizing or honoring DNT signals, we do not respond to them at this time.

## **10. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

**In Short:** If you are a resident of California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Kentucky, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Tennessee, Texas, Utah, or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law.

### **Sources of Personal Information**

Learn more about the sources of personal information we collect in "WHAT INFORMATION DO WE COLLECT?"

### **How We Use and Share Personal Information**

Learn more about how we use your personal information in the section, "HOW DO WE PROCESS YOUR INFORMATION?"

### **Will your information be shared with anyone else?**

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Learn more about how we disclose personal information to in the section, "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?"

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal information.

We have not sold or shared any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. We have disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under "WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?"

### **Your Rights**

You have rights under certain US state data protection laws. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law. These rights include:

- **Right to know** whether or not we are processing your personal data
- **Right to access** your personal data
- **Right to correct** inaccuracies in your personal data
- **Right to request** the deletion of your personal data
- **Right to obtain a copy** of the personal data you previously shared with us
- **Right to non-discrimination** for exercising your rights
- **Right to opt out** of the processing of your personal data if it is used for targeted advertising (or sharing as defined under California's privacy law), the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ("profiling")

Depending upon the state where you live, you may also have the following rights:

- Right to access the categories of personal data being processed (as permitted by applicable law, including Minnesota's privacy law)
- Right to obtain a list of the categories of third parties to which we have disclosed personal data (as permitted by applicable law, including California's and Delaware's privacy law)
- Right to obtain a list of specific third parties to which we have disclosed personal data (as permitted by applicable law, including Minnesota's and Oregon's privacy law)
- Right to review, understand, question, and correct how personal data has been profiled (as permitted by applicable law, including Minnesota's privacy law)
- Right to limit use and disclosure of sensitive personal data (as permitted by applicable law, including California's privacy law)
- Right to opt out of the collection of sensitive data and personal data collected through the operation of a voice or facial recognition feature (as permitted by applicable law, including Florida's privacy law)

### **How to Exercise Your Rights**

To exercise these rights, you can contact us by visiting \_\_\_\_\_, by emailing us at [law@wisefin-global.com](mailto:law@wisefin-global.com), or by referring to the contact details at the bottom of this document.

We will honor your opt-out preferences if you enact the Global Privacy

Control (GPC)opt-out signal on your browser.

Under certain US state data protection laws,you can designate an authorized agent to make a request on your behalf.We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with applicable laws.

### **Request Verification**

Upon receiving your request,we will need to verify your identity to determine you are the same person about whom we have the information in our system.We will only use personal information provided in your request to verify your identity or authority to make the request.However,if we cannot verify your identity from the information already maintained by us,we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes.

If you submit the request through an authorized agent,we may need to collect additional information to verify your identity before processing your request and the agent will need to provide a written and signed permission from you to submit such request on your behalf.

### **Appeals**

Under certain US state data protection laws,if we decline to take action regarding your request,you may appeal our decision by emailing us at.We will inform you in writing of any action taken or not taken in response to the appeal,including a written explanation of the reasons for the decisions.If your appeal is denied,you may submit a complaint to your state attorney general.

### **California "Shine The Light"Law**

California Civil Code Section 1798.83,also known as the "Shine The Light"law,permits our users who are California residents to request and obtain from us,once a year and free of charge,information about categories of personal information (if any)we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year.If you are a California resident and would like to make such a request,please submit your request in writing to us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUTTHIS NOTICE?"

## **11.DO WE MAKE UPDATES TO THIS NOTICE?**

***In Short:**Yes,we will update this notice as necessary to stay compliant with relevant laws.*

We may update this Privacy Notice from time to time.The updated version will be

indicated by an updated "Revised" date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

## **12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO) by email at [DPO@wisefin-global.com](mailto:DPO@wisefin-global.com), or contact us by post at: Wisefin Technology Company Limited.

Data Protection Officer  
Unit D5, 5th Floor, King Yip Factory Building  
59 King Yip Street, Kwun Tong  
Kowloon, Hong Kong  
999077

## **13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the applicable laws of your country or state of residence in the US, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please send e-mail to : [privacy@wisefin-global.com](mailto:privacy@wisefin-global.com).