

SUNRATE Privacy Policy EN v2.7

Your use of the Sunrate Services and our collection, use, retention, disclosure and protection of the personal information you provide to us will be subject to the following Privacy Policy, which you are requested to familiarize yourself with and understand. We may update it from time to time and you agree that we may not otherwise notify you. Your continued use of the Sunrate Services will be governed by the updated Privacy Policy. Therefore, we recommend that you check our website frequently.

1. Type of Information We Collect

- 1.1 Information which you provide by filling in both our website forms and any type of written forms, which includes information provided by you while you register and request to use our website, subscribe to and use our service, as well as any further information we may request when we process your service application, when we deliver services to you, and when you report a problem back to us.
- 1.2 Details of transactions executed through our website or other methods and services that we process for you, which may include payment amounts, details of beneficiaries of whom you are making payments to, information regarding incoming Funds and other transaction-related information. We will retain such information for each of your transactions using our service and may add it to your account profile for use in relation to your future transactions through our service.
- 1.3 The IP address of your computer and other information about the device you use to access our service, from which information you may be identifiable. We retain this information to detect unauthorized transactions.
- 1.4 Details of your visits to our website, including but not limited to, traffic data, location data, weblogs and other communication data. We collect these data for the purpose of providing you with our services or otherwise and providing the resources that you visit.
- 1.5 Information about yourself. This may include your name, address, phone number, email address, our potential and existing Customer's business name, registration number, business address, copies of ID of directors, directors' names, directors' dates of birth, employment details and information relating to your financial circumstances. In order to enable us to provide our services to you, you must provide your designated bank

account information, "Know Your Customer" information, password information, and responses to security questions. In addition to the "Know Your Customer" information you provide when you apply for a Sunrate account, we may ask you for further identification information in the course of providing services to you, in particular, when you make or receive high value payments, or to comply with our anti-money laundering regulations.

- 1.6 When you contact us, we may keep a record of that correspondence. We may also require you to complete surveys which we use for research purposes, although you do not have to respond to them.

2. How Do We Collect Information

- 2.1 We collect information about you when you access our website, register an account (online or through paper based forms) or when you communicate with us over the phone or in writing.
- 2.2 When you access our websites, we may collect your information such as IP address and cookies, please refer to Provision 8 regarding IP address and cookies.
- 2.3 When you register an account with us, we collect, process and store information including but not limited to the information mentioned in Provision 1.5. Once your Sunrate Account is fully set up and you begin to transact with us, we will collect, process and store financial and transactional information including but not limited to the information mentioned in Provision 1.2.

3. Purpose to Collect Information

- 3.1 One of the main reasons we collect and use your personal and business information is to allow us to process your account and service application, as well as transactions you may book through us and to maintain the accuracy of information on your account. Once you have a Sunrate Account with us, we will use your details to contact you and to reply to any queries or requests. We may use your information in the administration of your account, which includes updating your account details (this assists us to keep our records as up to date as possible) or in order to notify you of any change or improvement to our products or services which may affect your use.
- 3.2 We use your information in order to supply our products and services to you, meet our contractual obligations to you, safeguard our website, and so on.

Additionally, we may need to notify you of any changes relating to our products and services.

- 3.3 Anti-money laundering is one of Sunrate's top focuses, which requires us to undertake due diligence on our Customers. This may include use of electronic verification tools. Where electronic verification is not possible, we will require Customer to provide documents including but not limited to, copies of identification documents and proof of address. We may also need to pass your information onto governmental departments, regulatory authorities, the police/law enforcement agencies or to a court of law. This would be done, for example, to assist in the prevention of a crime (money laundering/fraud), to meet legal requirements or for other lawful purposes.
- 3.4 We may use your information to keep you updated of information concerning our products and services. Customer surveys help us to improve our services. We may send you emails inviting you to participate in surveys or requesting for feedback on our services. The information may be shared with affiliated third parties in aggregate form only. We may also use the information you provide to us when you interact on our website or sign up for our services. We may share this information with any members within our group, and third parties. Please contact us if you do not wish to receive such advertisements.
- 3.5 We may record all our telephone calls for security and training purposes.

4. Sharing of Information

- 4.1 We may disclose your personal information to any member within our group.
- 4.2 Under the following certain events, we may disclose your personal information to third parties: a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; b) If Sunrate or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 4.3 We may share your information with regulators, banks, e-commerce platforms (such as Amazon), other third party payment processors and any third party based on your authorization, and service provider(s) safeguarding our website:
 - 4.3.1 We may need to share your information with regulators or other law enforcement agencies. We may need to disclose or share your personal data in order to comply with our legal obligations, or to enforce or apply the Agreement or other agreements, and to protect the rights, property,

or safety of Sunrate, our Customers, or others. This includes exchanging information with other companies or organizations for the purposes of fraud detection and credit risk reduction.

4.3.2 We may need to share your information collected under Provision 1 with e-commerce platforms such as Amazon as requested, in order to enable you to use the collection accounts provided by us and to receive Funds from such platforms.

4.3.3 We may need to share your information with third parties in order to process your transactions, including but not limited to, bank counterparties and third party payment processors.

4.3.4 Owing to the nature of our business, we may need to share your information with individuals or organizations outside your country of residency, such as intermediary or beneficiary banks. We are required to add certain information to the payment, which may include your name and address.

4.3.5 Additionally, we may provide your information to a third party based on your authorization and instruction, and may share necessary information to service provider(s) safeguarding our website.

4.4 We may also use your information, or allow third parties selected by us to use your information, to provide you with information about products and services which may be of interest to you, and we or they may contact you by post or telephone. Contact us if you do not wish us to use your information this way, or to pass your details on to third parties for marketing purposes.

5. Storage of Information

5.1 We apply physical, electronic and procedural controls to protect your information. We store all information in electronic forms. Depending on the type of service you use, your information is stored on servers located in mainland China or Hong Kong, and is protected by actively maintained firewalls. We employ the most up-to-date anti-virus software and set restricted physical access to the servers. If you provide paper-based documentation, we may retain these paper documents in addition to their e-copies.

5.2 Transmission of data on the internet can never be guaranteed as completely secure. We do not and cannot guarantee security of information collected or transmitted electronically. However, we would make reasonable endeavors to protect your personal information.

- 5.3 All necessary information, including but not limited to, regulatory related information (e.g. information related to anti-money laundering and counter-terrorist financing), will be stored no less than 5 years according to regulatory legislation.

6. Access of Your Information

- 6.1 You may request in writing for details of personal information we hold about you, a description of that information, the purposes for which it is being used and all shared parties. However, we have sole discretion to reject such request with no liability nor obligation.
- 6.2 If we provide such information, we may charge you a certain amount of administration fee.

7. Change to Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on our website (www.sunrate.com), and where appropriate, notified to you by e-mail.

8. IP Address and Cookies

- 8.1 We may collect information about your computer, including available IP address, operating system and browser type, for purposes of system administration and reporting aggregate information to our advertisers. Such information is statistical data about the browsing actions and patterns of our Customers and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file stored on the hard drive of your computer, or similar technologies for information storage or retrieval, such as local shared objects, web beacons or web bugs.
- 8.2 A cookie is a small file of letters and numbers downloaded onto a device when a user accesses certain websites. A cookie will allow a website to identify a user's device. A cookie will contain the name of internet location of the source of that cookie and its lifetime.
- 8.3 We use session cookies to allow you to carry information across pages of our website to avoid re-entry of information. Such cookies are temporary cookies which would be stored in the cookie file of your browser only during your stay on that website.

- 8.4 We also use persistent cookies from time to time to help us recognize you as a unique user when you return to our website, and to monitor your use of our website; should you come to our website through a paid advertisement or a banner on a website of an Affiliate, it also enables us to link you to all of our group members and Service Providers. Persistent cookies may remain in the cookie file of your browser for a much longer period, depending on the lifetime of that specific cookie in question.
- 8.5 Some of our web pages may contain web beacons which allow us to count users who have visited these pages. Web beacons only collect limited information, including a cookie number, time and date of a page view, and a description of the page where the web beacon resides. These beacons do not carry any personally identifiable information and are used to track the effectiveness of a particular marketing campaign.

9. Enquiry and Contact

Should you have any other enquiries regarding this Privacy Policy, please kindly contact us at contact@sunrate.com.

SUNRATE 隱私政策 CN V2.7

在您使用 Sunrate 服務，以及我們在收集、使用、保留、披露和保護您提供給我們的個人資訊時都將須遵守如下隱私政策，請您熟悉和瞭解。我們將不時對其更新，您同意我們可不以其他方式另行通知您。在隱私政策更新後，您繼續使用 Sunrate 服務的行為將受更新後的隱私政策的約束。因此，我們建議您經常登錄我們官網查看。

1. 我們收集的資訊類型

- 1.1 您在填寫我們的網站表格以及任何類型的書面表格時提供的資訊。包括您在註冊及請求使用我們的網站、訂閱及使用我們的服務時提供的資訊，以及在我們處理您的服務申請、我們向您提供服務、以及您向我們報告問題時我們可能要求您提供的進一步資訊。
- 1.2 有關通過我們網站或其他方式執行的交易詳細資訊以及我們為您處理的服務詳細資訊。可能包括付款金額、收款人詳細資訊、匯入資金及其他交易相關資訊。每次您使用我們的服務進行交易時，我們會保留該等資訊，並可能將其添加至您的帳戶資料以供未來您使用我們服務進行交易時使用。
- 1.3 您電腦的 IP 位址以及您訪問我們的服務所用設備的其他資訊。這些資訊可能可以識別出您的身份。我們保留該等資訊旨在檢測未授權的交易。
- 1.4 有關您訪問我們網站的詳細資訊，包括但不限於流量資料、位置資料、網路日誌以及其他通信資料。我們收集這些資料旨在向您提供我們的服務或出於其他目的，以及向您提供您所訪問的資源。
- 1.5 關於您自身的資訊。該等資訊可能包括您的姓名、位址、電話號碼、電子郵寄地址、我們潛在和現有客戶的企業名稱、註冊號碼、辦公地址、董事身份檔副本、董事姓名、董事出生日期、就業詳情以及有關您財務狀況的資訊。為了使我們能夠向您提供我們的服務，您必須提供銀行帳戶資訊、客戶盡職調查資訊、密碼資訊以及安全問題的答案。除了在您申請開立 Sunrate 帳戶時提供的客戶盡職調查資訊外，在向您提供服務期間，我們可能會要求您提供進一步的身份識別資訊，尤其當您支付或接收高額款項而我們出於遵守反洗錢法規需要時。
- 1.6 當您聯繫我們時，我們可能保留該通信記錄。我們還可能要求您完成我們用於研究的調查問卷，您可以選擇不回應該等調查。

2. 我們如何收集資訊

- 2.1 當您訪問我們網站、註冊帳戶（線上註冊或通過紙質表格註冊）或通過電話或書面形式與我們溝通時，我們會收集有關您的資訊。
- 2.2 當您訪問我們的網站時，我們可能收集諸如您的 IP 位址與 Cookies 在內的資訊。請參見條款 8 關於 IP 地址與 Cookie 的說明。

- 2.3 當您在我們註冊帳戶時，我們會收集、處理和存儲包括但不限於條款 1.5 所述內容在內的資訊。一旦您的 Sunrate 帳戶開立完成並且您開始與我們進行交易，我們還會收集、處理和存儲財務和交易資訊，包括但不限於條款 1.2 所述資訊。

3. 我們收集資訊的目的

- 3.1 我們收集和使用您的個人及商業資訊的主要原因之一是讓我們可以處理您的帳戶申請、服務申請、您通過我們發起的交易，以及維持您帳戶資訊的準確性。一旦您在我們開立 Sunrate 帳戶，我們將使用您的詳細資訊與您進行聯絡、回復您的詢問或請求。我們可能在管理您的帳戶時使用您的資訊，包括為了更新您的帳戶詳細資訊（這有助於我們最大程度保持記錄的時效性）或告知您可能影響到您使用的產品或服務的任何變更或改進。
- 3.2 我們使用您的資訊是為了向您提供我們的產品及服務、履行我們對您的約定義務、更好地保護我們網站的安全等。此外，我們可能需要通知您有關我們產品及服務的任何變更。
- 3.3 反洗錢是 Sunrate 的主要焦點之一。該項工作要求我們對我們的客戶進行盡職調查。這其中可能涵蓋電子驗證工具的使用。當電子驗證不可用時，我們會要求客戶提供包括但不限於身份檔副本及地址證明在內的文件。我們可能還需要將您的資訊提供給政府部門、監管機構、員警/執法機構或法庭。這樣做是為了比如預防犯罪（洗錢/欺詐）、滿足法律要求或出於其他合法目的。
- 3.4 我們可能使用您的資訊以告知您有關我們產品及服務的最新資訊。客戶調查有助於我們提升我們的服務。我們可能向您發送電子郵件邀請您參與調查或徵求有關我們產品的回饋。該等資訊可能與協力廠商關聯公司共用，但只會以整體資訊提供。我們還可能使用您在我們網站互動或註冊我們的服務時提供的資訊。我們可能與 Sunrate 集團的任何成員及有合作的協力廠商共用該等資訊。如果您不希望收到這類廣告資訊，請聯繫我們。
- 3.5 我們可能出於安全及培訓目的保留所有我們的電話記錄。

4. 資訊的共用

- 4.1 我們可能將您的個人資訊披露給 Sunrate 集團的任何成員。
- 4.2 在下列特定情況下，我們可能將您的個人資訊披露給協力廠商：a) 當我們出售或收購任何業務或資產時，我們可能將您的個人資訊披露給該等業務或資產的潛在賣方或買方；b) 如果 Sunrate 或其實質上絕大部分資產被協力廠商收購，其持有的有關其客戶的個人資料也將屬於被轉讓資產之一。
- 4.3 我們可能將您的資訊共用給監管機構、銀行、Amazon 等電子商務平臺、其他協力廠商支付處理機構或其他您授權我們向其提供的協力廠商，以及保護我們網站安全的服務商：
- 4.3.1 我們可能需要將您的資訊共用給監管機構或其他執法機構。此外，我們可能需要披露或共用您的個人資訊以履行我們的法律義務、或執行或應用本協定或其他協定、以及保護 Sunrate、Sunrate 的客戶或其他人的權利、財產及安全。這包括出於進行欺詐監測及降低信用風險的目的，而與其他公司或組織交換資訊。

- 4.3.2 我們可能需要應 Amazon 等電子商務平臺的要求向其提供條款 1 下您的資訊，以便您能夠使用我們提供的收款帳戶並從這些電子商務平臺接收資金。
- 4.3.3 為了處理您的交易，我們可能需要將您的資訊共用給協力廠商，包括但不限於銀行交易對手及協力廠商支付處理機構。
- 4.3.4 根據我們的業務性質，我們可能需要將您的資訊共用給您居住國之外的個人或組織，例如中間行或收款行。我們需要在付款資訊中加入特定資訊，該等資訊可能包括您的姓名及地址。
- 4.3.5 此外，我們還可能根據您的授權向您指示的協力廠商提供您的資訊，以及將必要的資訊共用給保護我們網站安全的服務商。
- 4.4 我們還可能使用您的資訊，或允許我們選擇的協力廠商使用您的資訊、向您提供您可能感興趣的產品或服務，並且我們或他們可能通過郵寄或電話方式與您聯繫。如果您不希望我們以此種方式使用您的資訊，或不希望我們出於行銷目的將您的詳細資訊提供給協力廠商，請聯繫我們。

5. 資訊的存儲

- 5.1 我們使用物理、電子及程式管控來保護您的資訊。我們將所有資訊以電子形式存儲。根據您使用的服務的類型，您的資訊存放於架設在中國大陸或香港的伺服器內，並由積極維護的防火牆提供保護。我們使用最新的防毒軟體，並為伺服器設置了物理訪問限制。如果您提供了紙質文檔，我們可能在保存該等文檔的電子版本之外保留其紙質版本。
- 5.2 通過互聯網進行的資料傳輸無法保證其絕對安全。我們不會也無法為以電子方式收集或傳輸的資訊提供安全擔保，然而，我們會採取合理努力保護您的個人資訊。
- 5.3 所有必要資訊，包括但不限於監管相關資訊（如反洗錢及反恐怖主義融資相關的資訊），將根據監管法規要求存儲不少於 5 年。

6. 對您資訊的訪問

- 6.1 您可以通過書面方式請求我們提供有關我們所持有的有關您的個人資訊詳情、該等資訊的描述、其目前用途以及所有被共用的物件，然而我們可以自主決定拒絕該等請求而無需承擔任何責任或義務。
- 6.2 如果我們提供該等資訊，我們可能向您收取一筆管理費用。

7. 隱私政策的修改

我們未來可能對隱私政策做出的任何修改，將在我們的網站（www.sunrate.com）發佈，並在合適情況下通過電子郵件通知您。

8. IP 地址及 Cookies

- 8.1 我們可能收集有關您電腦的資訊，包括可用 IP 位址、作業系統及流覽器類型，以進行系統管理及將整體資訊報告給我們的廣告商。該等資訊為我們客戶流覽活動及流覽模式的統計資料，並不識別任何個人。出於同樣原因，我們可能通過一個存儲在您電腦硬碟上的 Cookie 檔，或用於資訊存儲和取回的類似技術（例如本地共用物件、網路信標，或網路臭蟲）來獲取有關您一般互聯網使用的資訊。
- 8.2 Cookie 是使用者訪問特定網站時下載到其設備上的一個包含字母和數位的小檔。Cookie 可以讓網站識別使用者的設備。Cookie 會包含該 cookie 來源的網路位置名稱及 cookie 的期限。
- 8.3 我們使用會話 Cookie 以讓您可以在我們網站頁面之間攜帶資訊，從而避免資訊再次輸入。此種 Cookie 屬於臨時 Cookie，僅會在您停留該網站期間被保存在您流覽器的 cookie 檔裡。
- 8.4 我們不時還會使用持久性 Cookie，以幫助我們在您返回我們的網站時將您識別為一獨特的用戶，以及監控您對我們網站的使用；如果您通過付費廣告或一家關聯公司網站上的橫幅來到我們的網站，它還讓我們可以將您連結到所有我們的關聯公司以及服務提供者。持久性 Cookie 可能在您流覽器 cookie 中存在更長一段時間，取決於該具體 Cookie 的存在期限。
- 8.5 我們的部分網頁可能含有網路信標，它使得我們可以統計訪問這些頁面的使用者的數量。網路信標只會收集有限資訊，包括 Cookie 號碼、網頁流覽時間與日期、信標所在網頁的描述。這些信標不攜帶任何可以識別個人的資訊，信標的用途是用於追蹤某一具體行銷活動的有效性。

9. 諮詢與聯繫

如果您有關於本隱私政策的任何其他疑慮，請您通過以下電子郵寄地址聯繫我們：
contact@sunrate.com。