

PRIVACY POLICY

隐私政策

Issue Date: September 20th, 2021

发布日期：2021年09月20日

Updated Date: June 20th, 2025

更新日期：2025年06月20日

Welcome to use ChatPlusAI!

欢迎使用 ChatPlusAI !

Shanghai Jiongxin Information Technology Co., Ltd. (hereinafter referred to as the "Company" or "we"), the service provider of ChatPlusAI (the "Software"), is aware of the importance of personal information and privacy to its users (i.e., "you"), and therefore has formulated this *Privacy Policy* (the "Policy") to set forth the rules governing the collection, use, sharing, management and protection of your information when you use the Software and enjoy other Internet Software products and services provided by the Company (hereinafter collectively referred to as the "Services"). We hereby specially remind you that you are expected to carefully read and thoroughly understand relevant contents of this Policy (especially the text highlighted in bold and underlined) before you use the Services, and use the Services after confirming your full understanding and agreement thereof.

ChatPlusAI (下称“本软件”)的服务提供者上海炯信信息科技有限公司(下称“本公司”或“我们”)深知个人信息及隐私对用户(即“您”)的重要性,因此制定本隐私政策(下称“本政策”)向您阐明您在使用本软件并享受本公司提供的其他互联网软件产品及服务(下统称“本服务”)时,本公司将收集、使用、共享、管理及保护您的信息的相关规则。在此特别提示:希望您在**使用本服务前仔细阅读并透彻理解本政策相关内容(特别是加粗及下划线的内容)**,在确认充分理解并同意后使用本服务。

You are deemed to have agreed to this Policy when you agree to register. This Policy is an integral part of the *Service Agreement* of the Company.

您在**同意注册**之时,即视为您已经同意本政策全部内容。本政策属于本公司《服务协议》之不可分割的一部分。

【Scope of Application/适用范围】

- This Policy applies to/本政策适用范围:

This Policy applies to all Software products and services provided by the Company to you.

本政策适用于本公司向您提供的各项软件产品和服务。

【Collection and Use of Information/信息收集和使用】

1. The company collect and use your personal information in the following process of providing this service. **We** draw your attention to the **sensitive personal information that may be involved** in it in bold. If the personal information you provide is not your own information, you should ensure that you have obtained the authorization and consent of that person.

本公司会在以下提供本服务过程中收集和使用您的个人信息。对于其中可能涉及的敏感个人信息，我们以加粗的方式提醒您注意。如您提供的个人信息非本人信息，您应确保您已获得该人的授权同意。

- **[User Registration and Login]:** You can register as a user of the Company by mobile phone number and email address. When you register and log in to use the Service, the Company will collect your user name, mobile phone number, email address, device attributes and other information for verifying whether your identity information is true. You may browse the product pages anonymously, but you are required to register as a user of the Company when you purchase the Services.

【用户注册及登录】：您可通过手机号和电子邮箱注册成为本公司用户。您注册和登录使用本服务时，本公司将收集您的用户名、手机号码、邮箱地址及设备属性等信息，用于验证您的身份信息是否真实。您可以匿名浏览产品页面，但在您采购本服务时，需要您注册成为本公司用户。

- **[Real Name Authentication]:** In order to comply with relevant laws, regulations and regulatory requirements, ensure the authenticity of user identities, and protect the safety of you and other users, when necessary, we will verify your **real identity information**.

【实名认证】：为符合相关法律法规、监管要求，确保用户身份真实性、保障您及其他用户的安全，在必要时，我们将核对您的**真实身份信息**。

- **[Purchase Information] :** In order to fulfill basic functions, including processing your payment and refund requests, and keeping you informed of the purchase order status, we will collect your identity and contact information such as name, phone number, as well as **financial information or payment account information**. Also, we will collect **location data** at an IP address-based level to tailor your experience in terms of displaying the appropriate local website, language, or user experience. The above information involves your sensitive personal information, but it is necessary for us to process your payment and refund request, and we will strictly protect the information you provide in accordance with legal regulations.

【购买信息】：为了履行基本功能，包括处理您的付款和退款请求，以及让您了解购买订单状态，我们将收集您的身份和联系信息，例如姓名、电话号码以及**财务信息或付款帐户信息**。此外，我们将在基于IP地址的级别收集**位置数据**，以根据显示适当的本地网站、语言或用户体验来定制您的体验。上述信息涉及您的敏感个人信息，但是我们处理您的付款和退款请求所必需的，我们将对您提供的信息按照法律规定进行严格保护。

- **[Issuance of Invoices]:** When you apply to the Company for issuing invoices, the Company will collect your name and other registration information for the purpose of verifying your payment voucher and invoicing information. You shall be responsible for ensuring the authenticity, accuracy and completeness of the invoice information submitted.

【发票开具】:当您向本公司申请开具发票时,本公司将收集您的姓名/名称等注册信息,用于验证您的付款凭证及开票信息。您对提交的开票信息负有保证其真实、准确、完整的责任。

- **[Transaction and After-sale Service]:** To provide you with transaction and after-sale services, and to realize and optimize service features and content, the Company will collect and use the desensitized order information from your store (including but not limited to logistics information), customer service and after-sale service information required for realizing the functions of the Software, product reviews and other store operation information.

【交易及售后】:为了向您提供交易和售后服务,实现并优化服务功能及服务内容,本公司将收集、使用您店铺的脱敏后的订单信息(包括但不限于物流信息)、实现产品功能所需的客服与售后服务信息、商品评价及其他店铺运营信息。

- In order to contact you easily, help you solve your inquiries, complaints and suggestions as soon as possible or record the solutions and results of relevant problems, the Company will collect the records of communication/call and the relevant contents between you and the Company (including account information, order information, other information provided by you to prove relevant facts or the contact information left by you).

为便于与您联系、尽快帮助您解决您的咨询、投诉及建议或记录相关问题的处理方案及结果,本公司会收集您与本公司的沟通、通信/通话记录及相关内容(包括账户信息、订单信息、您为了证明相关事实提供的其他信息或您留下的联系方式信息)。

- **[Guarantee Service Security]:** In order to ensure the safety and legality of your use of the Services and to more accurately comply with network management laws and regulations, the Company may use your account information, transaction information, order information and other information to prevent the occurrence of various violations of laws and regulations or the infringement of legal rights and interests of other parties.

【保障服务安全】:为保障您使用本服务的安全性及合法性,更准确地遵守网络管理法律法规,本公司可能会使用您的账户信息、交易信息、订单等信息,用于防范各类违法违规事件的发生或其他主体合法权益被侵害的情况。

You understand and agree that : if the information you provide contains the personal information of other third parties, you shall ensure that you have obtained legal authorization and you shall deal with the disputes arising from such personal information independently before providing such personal information to the Company.

您理解并同意:若您提供的信息中含有其他第三方的个人信息,在向本公司提供这些个人

信息之前，您需确保您已经取得合法的授权并独自处理该等个人信息引发的纠纷。

2. In order to provide you with more high-quality, satisfactory services and strive to improve your experience, the Company may apply for some permissions from you in the following scenarios, collect and use your information. If you refuse to provide such information or grant the corresponding permissions, you will still be able to obtain the basic services provided by the Company, but you may not be able to obtain the high-quality experience brought by the additional information.

为向您提供更加优质、满意的服务，努力提升您的体验，在下列场景本公司可能会向您申请开启部分权限，并收集和使用您的信息。若您拒绝提供这些信息或开通相应权限，您依然可以获得本公司为您提供的基础服务，但您可能无法获得这些附加信息给您带来的优质体验。

- [Device Identifier(ANDROID ID) Information]: In order to ensure the secure operation of the App, perform statistical analysis, and identify abnormal behavior, we will collect your device identifier information, such as the ANDROID ID. This information will not be used to identify you personally and will not be linked to any other personal data.

【设备标识符(ANDROID ID)信息】：为了保障应用程序的安全运行、进行统计分析以及识别异常行为，我们会收集您的设备标识符信息，例如 ANDROID ID。该信息不会用于识别您的个人身份，也不会与其他个人信息进行关联。

- [Installed Application List]: To enable internal security checks and feature optimization, we need access to your list of installed applications. This information will not be used for advertising purposes or shared with any third parties.

【已安装应用列表】：为了实现软件内部的安全判断和功能优化，我们需要访问您的已安装应用列表信息，此信息不会用于广告推送或共享给第三方。

- [Camera Lens (Camera) and Photo Album (Picture Library) Information]: If you use camera to take photos or upload photos or pictures in photo albums to prompt good comments or post comments through the Services, we will apply for the permission of your camera lens (camera) or photo album (picture library) and collect the picture information you uploaded.

【摄像头(相机)、相册(图片库)信息】：当您通过本服务，利用摄像头拍照，或通过相册上传照片或图片来设置催好评、发表评论信息等，我们会向您申请开启摄像头(相机)权限，或相册(图片库)权限；并收集您上传的图片信息。

- [Microphone (Voice) Information]: In order to better use the Company's Service, when you use microphone to communicate with the Company or other parties, the Company may apply for the permission of your microphone (voice) and collect your voice information to identify your needs.

【麦克风(语音)信息】：为更好地使用本公司服务，当您启用麦克风与本公司或其他主体沟通，本公司可能会申请开启您的麦克风(语音)权限，并收集您的语音信息以识别您的需求。

- **[Calendar Information]:** In order to help you record your benefits or remind you to claim your benefits, the Company may apply for the permission of your calendar and collect your calendar information.

【日历信息】 : 为了帮助您记录权益或提醒您领取权益 , 本公司可能向您申请开启日历权限 , 并收集您的日历信息。

- **[Storage Permission Information]:** In order to provide you with the functions such as information distribution or local crash log information, the Company may apply for the permission of reading/writing the storage of your device, and will read or write pictures, files, crash log information and other necessary information to the storage space of your device.

【存储权限信息】 : 为了向您提供信息发布或在本地记录崩溃日志信息等功能 , 本公司可能向您申请开启可读取/写入您设备存储的权限 , 并将从您设备存储空间内读取或向其中写入图片、文件、崩溃日志信息等必要信息。

- **[Auto-start and Associated Start Information]:** In order to ensure the normal operation of core functions such as message notification and real-time communication, the Company may enable auto-start or associated start in certain scenarios, such as when the system starts, network status changes, or specific modules are triggered. These behaviors will only occur after obtaining your consent or based on your active usage behavior. You can manage related permissions in the system settings. Disabling these permissions may affect the timely delivery of messages or related service experience.

【自启动与关联启动信息】 : 为确保消息通知、实时通信等核心功能的正常运行 , 本公司可能会在特定场景下启用应用的自启动或者关联启动功能 , 例如在系统启动、网络状态变化或特定模块触发时。这些行为仅在获得您的授权同意或基于您的主动使用行为后发生 , 您可在系统设置中管理相关权限。关闭相关权限可能会影响消息的及时送达或相关服务体验。

3. **Exceptions of Consent/同意的例外情形**

- **In the following circumstances, the Company shall not need to obtain your authorization or consent to collect or use your personal information:**

以下情形中 , 本公司收集、使用您的个人信息无须征得您的授权同意 :

- (a) Necessary for signing and performing the contracts in which you are the party;
为订立、履行您作为一方当事人的合同所必需 ;
- (b) Necessary for the performance of duties or obligations stipulated in laws and regulations;
为履行法定职责或者法定义务所必需 ;
- (c) Necessary to respond to public health emergencies, or to protect the life, health and property safety of natural persons in emergency situations;
为应对突发公共卫生事件 , 或者紧急情况下为保护自然人的生命健康和财产安全所必需 ;
- (d) The implementation of news reporting and public opinion supervision for public

- interest, within a reasonable scope of handling personal information;
为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；
- (e) Handling personal information within a reasonable scope as stipulated by the laws and regulations regarding personal information that individuals have voluntarily disclosed or other legally disclosed;
依照法律规定在合理的范围内处理个人自行公开或者其他已经合法公开的个人信息；
- (f) Other circumstances stipulated by laws and regulations.
法律、行政法规规定的其他情形。

【Use of Cookie /Cookie 的使用】

- You understand and agree that, in order to make your access experience easier, when you visit the Company or use the Company's Services, the Company may use relevant technologies to send one or more Cookies or anonymous identifiers to your device in order to collect and store information when you visit or use the Company's Services. The Company undertakes not to use Cookies for any purposes other than those stated in this Policy. The Company mainly uses Cookies and similar technologies for the purpose of fulfilling the following functions or services:

您理解并同意，为使您获得更轻松的访问体验，您访问本公司或使用本公司服务时，本公司可能会使用相关技术向您的设备发送一个或多个 Cookie 或匿名标识符，以收集和存储您访问、使用本公司服务时的信息。本公司承诺：不会将 Cookie 用于本政策所述目的之外的任何其他用途。本公司使用 Cookie 和同类技术主要为了实现以下功能或服务：

- **Ensuring safe and efficient operation of Software products and services:** The Company may set Cookies or anonymous identifiers that authenticate and ensure security so that the Company can verify that you have logged in safely to the Services or identify if you have encountered theft, fraud or other illegal activities. These technologies also help the Company improve the efficiency of the Services, login and response times.

保障软件产品与服务的安全、高效运转：本公司可能会设置认证与保障安全性的 Cookie 或匿名标识符，以便本公司能够确认您是否安全登录了服务，或者分辨您是否遭遇了盗用、欺诈及其他不法行为。这些技术还会帮助本公司改进服务效率、提升登录和响应速度。

- **Helping you have an easier access experience:** Using such technologies can help you avoid the step and process of repeatedly filling in personal information and entering search terms.

帮助您获得更轻松的访问体验：使用此类技术可以帮助您省去重复填写个人信息、输入搜索内容的步骤和流程。

- **Cookie clearing:** Most browsers provide the user with the function to clear the browser cache data. You can clear the data in the settings function of the browser. If you do so, you may not be able to use the Services or corresponding functions provided by the Company which rely on Cookies as a result of such modifications.

Cookie 的清除：大多数浏览器均为用户提供了清除浏览器缓存数据的功能，您可以在浏览器设置功能中进行相应的数据清除操作。如您进行清除，可能因为这些修改，您可能无法使用依赖于 Cookie 由本公司提供的服务或相应功能。

【Public Disclosure of Information/信息的公开披露】

The Company attaches great importance to the protection of your personal information. Without your consent, the Company will not disclose your personal information to any unrelated third party or make it public, except for the following reasons:

本公司非常重视保护您的个人信息，未经您同意，本公司不会将其披露给无关的第三方，更不会将其公之于众，但因下列原因而披露的除外：

- With your explicit consent or based on your initiative choice;
获得您明确同意或基于您的主动选择；
- In the event that your personal information has to be provided in accordance with the requirements of laws, regulations, mandatory administrative enforcement or judicial requirements, the Company may publicly disclose your personal information in accordance with the type of personal information required and the manner of disclosure;
根据法律、法规的要求、强制性的行政执法或司法要求而必须提供您个人信息的情况下，本公司可能会依据所要求的个人信息类型和披露方式公开披露您的个人信息；
- Other circumstances that may be disclosed in accordance with laws and regulations or the agreements between the parties.
其他依据法律规定或双方约定可以披露的情形。

【Information Sharing/信息的共享】

Except in the following cases, The Company will not share your personal information with any individuals, companies or organizations other than the Company. If it is necessary to provide personal information to other third parties in the process of providing services to you, we will inform you in advance of the recipient's name or organization, contact information, the purpose and method of processing, and the types of personal information involved. We will also obtain your authorized consent.

除以下情况外，本公司不会将您的个人信息共享给本公司以外的任何个人、公司或组织。如在我们向您提供服务的过程中需要向其他第三方提供个人信息的，我们会事先告知您接收方的名称或者姓名、联系方式、处理目的、处理方式和个人信息的种类，并获取您的授权同意。

- In accordance with this Policy or with your explicit prior consent or authorization;
依据本政策或事先已获得您明确的同意或授权；
- When necessary in accordance with applicable laws, regulations, requirements of legal procedures, and mandatory administrative or judicial requirements;
根据适用的法律、法规、法律程序的要求、行政或司法的强制性要求所必须时；

- To the extent permitted by laws and regulations, in order to protect the Company, its affiliates or partners, you or other users of the Company or social public interests, property or safety from damage;

在法律、法规允许的范围内,为维护本公司及关联公司或合作伙伴、您或其他本公司用户或社会公共利益、财产或安全免遭损害时;

- In order to achieve the core functions of the Company's Software and Services or provide you with the Services;

为实现本公司的软件产品和服务的核心功能或提供您需要的服务;

- When necessary to share information with third-party service providers, like payment service provider, Marketing and advertising services, Fraud prevention and information security service provider, etc.

必要时与第三方服务提供商共享信息,如支付服务提供商、营销和广告服务商、欺诈预防和信息安全服务提供商等;

- To deal with disputes or controversies between you and others at your request;

应您的需求为您处理您与他人的纠纷或争议;

- In accordance with the relevant agreements or other legal documents signed with you;

根据与您签署的相关协议或其他法律文件的约定;

- For the purpose of academic research;

基于学术研究而使用;

- You breach this Policy, and the Company provides the information to a third party for the purpose of rights protection;

您违反了本政策,且本公司出于维权需要向第三方提供的;

- For the purpose of social public interests in accordance with laws and regulations.

基于符合法律、法规规定的社会公共利益而使用。

Our software products or services may include third-party products or services. As data processors, these third-party companies may also collect and use your personal information. We will carefully evaluate the purposes for which third parties use the shared information and conduct a comprehensive assessment of the security capabilities of these partners. We will strictly monitor the security of the software development kit (SDK) and application programming interface (API) of the partner to obtain information to protect data security. Currently, the relevant information about the third-party products or services involved is as follows:

我们的软件产品或服务可能包括第三方产品或服务。第三方公司作为数据受托处理者,也可能收集并使用您的个人信息。我们将审慎评估第三方使用共享信息的目的,对这些合作方的安全保障能力进行综合评估。我们会对合作方获取信息的软件工具开发包(SDK)、应用程序接口(API)进行严格的安全监测,以保护数据安全。目前,涉及的第三方产品或服务的相关信息如下:

SDK 名称 SDK Name	公司名称 Corporate name	使用目的 Purpose of use	使用场景 Usage scenarios	第三方隐私链接 Third-Party privacy links
云信即时通讯 Yunxin IM	杭州网易质云科技有限公司 NetEase	消息投递/ Message delivery 多端消息同步/M ulti-terminal message synchronization 消息漫游/Messa ge roaming	提供即时通讯服务 ProvidingIM service	https://yunxin.163.com/clauses?serviceType=3
小米推送 Xiaomi Push	北京小米移动软件有限公司 Beijing Xiaomi Mobile Software Co., Ltd	推送消息/ Message Push	在小米手机终端推送消息时使用 Used for pushing messages on Xiaomi mobile devices	https://dev.mi.com/console/doc/detail?pld=1822
华为推送 HUAWEI Push	华为软件技术有限公司 HUAWEI	推送消息/ Message Push	在华为手机终端推送消息时使用 Used for pushing messages on Huawei mobile devices	https://developer.huawei.com/consumer/cn/doc/app/20213
OPPO 推送 OPPO Push	广东欢太科技有限公司 Guangdong Huantai Technology Co., Ltd	推送消息/ Message Push	用于向 OPPO 手机用户推送消息 Used for pushing messages to OPPO phone users	https://open.oppomobile.com/new/developmentDoc/info?id=10288
VIVO 推送 VIVO Push	广东天宸网络科技有限公司及其关联公司 Guangdong Tianchen Network Technology Co., Ltd. and its affiliated companies	推送消息/ Message Push	用于向 VIVO 手机用户推送消息 Used for pushing messages to VIVO phone users	https://www.vivo.com.cn/about-vivo/privacy-policy

You fully understand and agree that if the Company needs to share your personal information with any affiliate of the Company in order to better provide Services to you, the Company will obtain your authorization and consent. The Company does not and shall not permit any affiliate of the Company to use the information we share with you for any other purposes than those stated in this Policy, and we shall use reasonable technical measures (e.g., encrypted transmission) to protect your information when sharing it with an affiliate. If the Company shares your sensitive personal information or any affiliate of the Company changes the use or processing purpose of your personal information, your authorization and consent will be asked for again.

您充分理解并同意，如本公司为了更好地向您提供服务需将您的个人信息与本公司的关联公司共享的，本公司将获得您的授权同意。本公司没有、也不会许可本公司的关联公司将我们与之共享的信息用于任何其他用途，且受本政策中所声明目的的约束；并且在与关联公司分享上述信息时，我们将采取合理的技术手段（如，加密传输）来保障您的信息安全。如果本公司共享您的个人敏感信息或本公司的关联公司要改变个人信息的使用及处理目的，将再次征求您的授权同意。

【Information Security/信息安全】

- The Company has adopted industry-standard security measures to protect the personal information provided by you and prevent the data from unauthorized access, public disclosure, use, modification, damage or loss and other situations. The Company will take all reasonable and practical measures to protect your personal information.

本公司已使用符合业界标准的安全防护措施来保护您所提供的个人信息，防止数据遭到未经授权访问、公开披露、使用、修改、损坏或丢失等情形。本公司会采取一切合理可行的措施，保护您的个人信息。

- However, you fully understand and agree that due to the limitation of technology and the possibility of various malicious methods, in the Internet industry, even if we do our best to strengthen security measures, it is impossible to guarantee that the information is 100% safe all the time.

但您充分理解并同意：由于技术的限制以及可能存在的各种恶意手段，在互联网行业，即便竭尽所能加强安全措施，也不可能始终保证信息百分之百的安全。

- After the occurrence of an unfortunate personal information security incident, the Company shall, in accordance with the requirements of laws and regulations, inform you of the basic information and possible impact of the security incident, the disposal measures taken or to be taken, the suggestions on risk prevention and reduction on your own initiatives, etc. We will inform you of the incident by E-mail, letter, telephone or push notice. If it is difficult to inform the personal information subjects one by one, we will take reasonable and effective ways to make public announcement. In the meantime, the Company will also report the handling of personal information security incidents in accordance with the requirements of regulatory authorities.

在不幸发生个人信息安全事件后,本公司将按照法律法规的要求向您告知:安全事件的基本情况 and 可能的影响、已采取或将要采取的处置措施、您可自主防范和降低风险的建议、对您的补救措施等。事件相关情况我们将以邮件、信函、电话或推送通知等方式告知您,难以逐一告知个人信息主体时,我们会采取合理、有效的方式发布公告。同时,本公司还将按照监管部门要求,上报个人信息安全事件的处置情况。

【Place and Period of Storage of Information/信息的存储地点和时间】

- Your personal information will be stored on the servers of the platform.
您的个人信息将存储在平台方的服务器上。
- All of your personal information will be stored in the Singapore, with the exceptions of:
您的个人信息将会被存储于新加坡境内,但以下情形除外:
 - (a) Otherwise explicitly stipulated by laws and regulations;
法律法规另有明确规定;
 - (b) With your explicitly authorization;
获得您的明确授权;
 - (c) Your personal and voluntary conducts such as cross-border transactions via the Internet.
您通过互联网进行跨境交易等个人主动行为。
- In response to the above circumstances, the Company will protect your personal information in accordance with this Policy and relevant laws and regulations.
针对以上情形,本公司会依据本政策及相关法律法规对您的个人信息提供保护。
- The Company will retain your personal information only for the period necessary to achieve the purposes stated in this Policy, unless the retention period is required to be extended based on your needs or as permitted or required by laws and regulations. When you withdraw your consent, delete information or unsubscribe your account, we will delete or anonymize your personal information as required by laws and regulations.
本公司只会在达成本政策所述目的所需期限内保留您的个人信息,除非根据您的需要或应法律法规的允许或要求而需延长保留期。在您撤回授权同意、删除信息或注销您的账户时,我们将根据法律法规的要求删除或匿名化处理您的个人信息。

【The Rights of Personal Information/个人信息的权利】

1. Right of inspection, correction, supplement/查阅权、更正权、补充权
 - You have the right to review, correct, and supplement your personal information at any time by accessing your account.

您有权随时通过访问您的账号，查阅、更正、补充您的个人信息。

- If you want to further review your personal information collected by us, or if you find that your personal information we have collected, stored, and used is incorrect or needs to be updated, you can request for review or correction through the methods described in [Contact Us] below. , requirements to supplement the personal information we hold about you, except for exceptions provided by laws and regulations.

如您想进一步查阅我们收集的您的个人信息的，或发现我们收集、存储、使用的您的个人信息有错误或者需要更新的，您可通过下方【联系我们】所述方式，提出查阅、更正、补充我们保有的有关您的个人信息的要求，法律法规规定的例外情况除外。

2. Right to Copy/复制权

- You have the right to obtain a copy of your personal information. Subject to relevant legal requirements and where technically feasible, we will provide you with a copy of your personal information upon your request. You can contact us through the methods described in [Contact Us] below, and after verifying your identity, we will provide you with a copy of your personal information in our Services.

您有权获取您的个人信息副本。在符合相关法律规定且技术可行的前提下，我们将根据您的要求向您提供您的个人信息副本。您可通过下方【联系我们】所述方式联系我们，在核实您的身份后，我们将向您提供您在我们的服务中的个人信息副本。

3. Right to Delete/删除权

- For some of your personal information, you can contact us through the methods described in [Contact Us] below to ask us to delete it. Once you request deletion, we will delete or anonymize such information, unless otherwise provided by laws and regulations:

对于您的部分个人信息，您可通过下文【联系我们】所述方式联系我们要求我们进行删除，一旦您删除后，我们即会对此类信息进行删除或匿名化处理，除非法律法规另有规定：

- In the following circumstances, you could request us to delete your personal information:

在以下情形中，您可以向我们提出删除您的个人信息的请求：

- (a) The processing purpose has been achieved, cannot be achieved, or is no longer necessary to achieve the processing purpose;

处理目的已实现、无法实现或者为实现处理目的不再必要；

- (b) If our processing of your personal information violates laws and regulations;

如果我们处理您的个人信息的行为违反法律法规；

- (c) If our processing of personal information seriously violates our agreement with you;

如果我们处理个人信息的行为严重违反了与您的约定；

(d) If you no longer use our Software products or services, or you voluntarily unsubscribe your account;

如果您不再使用我们的软件产品或服务，或您主动注销了账号；

(e) If you withdraw your consent to the Privacy Policy.

如果您撤回同意隐私政策。

- Special reminder: To ensure security, we may first ask you to verify your identity (such as asking you to provide written information or other methods); after you pass the identity verification, we will delete your information from the systems involved in implementing daily business functions. Personal information cannot be retrieved or accessed.

特别提醒，为保障安全，我们可能会先要求验证您的身份（如要求您提供书面资料或其他方式）；当您通过身份验证后，我们会从实现日常业务功能所涉及的系统中删除您的个人信息，使其保持不可被检索、访问的状态。

4. Changing the Scope of Your Authorization or Withdrawing Your Authorization/改变您授权同意的范围或撤回您的授权

- You can check the status of each authorization on the client-side of the Company. When you open any authorization, you mean that you have authorized the Company to collect and use such information for its purposes. Once you close any authorization, you will withdraw the authorization, and the Company will not continue to collect and use such personal information and accordingly shall not achieve the purposes corresponding to the authorization. You may withdraw all authorization to continue to collect your personal information by unsubscribing your account. **However, your decision to close an authorization will not affect any previous collection, processing and use of information based on your authorization.**

您可在本公司客户端逐项查看授权权限的状态。当您开启任一权限即表示您已授权本公司收集和使用该项信息来实现对应目的。您一旦关闭任一权限即代表您取消了授权，本公司将不再继续收集和使用该项个人信息，也无法为您实现该授权所对应目的。您可以通过注销账户的方式，撤回本公司继续收集您个人信息的全部授权。**但是，您关闭权限的决定不会影响此前基于您的授权所进行的信息的收集、处理与使用。**

- Please understand that each business function requires certain basic personal information to complete. If you withdraw your consent or authorization, the Company will not be able to continue to provide you with the services for which the consent or authorization has been withdrew, and will no longer process your personal information. **However, your decision to withdraw your consent or authorization will not affect any previous collection, processing and use of information based on your authorization.**

请您理解，每个业务功能需要一些基本的个人信息才能完成，当您撤回同意或授权后，本公司无法继续为您提供撤回同意或授权所对应的服务，也不再处理您的个人信息。**但您撤回同意或授权的决定，不会影响此前基于您的授权所进行的信息的收集、处理与使用。**

5. Unsubscribe Account/注销账户

- You may check the way to unsubscribe your account and the procedures you shall follow by entering “Unsubscribe” in [Contact Us] of the client-side of the Company. After you successfully apply to unsubscribe your account with the Company, the Company will complete a review within [7] business days after your application. After the review, the Company will delete or anonymize your personal information in accordance with this Policy, unless otherwise stipulated by laws and regulations.

您可通过本公司客户端“【联系我们】”输入“注销”查看注销账户的方式以及您应履行的程序。当您成功申请注销本公司账户后,本公司将在您提出申请后的【7】个工作日内完成审核,审核通过后,本公司将根据本政策的规定对您的个人信息进行删除或匿名化处理,法律法规另有规定的除外。

6. Other Requests Regarding Personal Information/其他个人信息相关请求

- Subject to limitation set out in Data Protection Laws of Singapore, you have certain rights in relation to your personal information. For example, you have the right to request an explanation of our rules for processing your personal information . You may also have the right to review automated decision making. You can contact us via the method specified below if you want to exercise these rights or make complaints regarding personal information. The Company will complete a review within [7] business days after your application. After the review, the Company will response your requests regarding personal information in accordance with this Policy, unless otherwise stipulated by laws and regulations.

根据新加坡数据保护相关法律,您有若干个人信息相关的权利。例如,您有权要求我们对您的个人信息处理的规则进行解释说明等。您也有选择自动化决策的权利。如您希望行使上述权利或有任何有关个人信息的诉求,您可通过下述的方式联系我们。本公司将在您提出申请后的【7】个工作日内完成审核,审核通过后,本公司将根据本政策的规定对您的个人信息相关请求予以响应,法律法规另有规定的除外。

【Protection of Minors/未成年人保护】

- The Company attaches great importance to the protection of minors’ personal information. If you are a minor under the age of 18, please read this *Privacy Policy* and use the Services or provide us with your personal information with the consent of your parents or guardians. If your guardian does not agree to your use of the Services or provide us with your personal information in accordance with this *Privacy Policy*, please terminate the use of the Services immediately and notify the Company to delete your personal information in a timely manner.

本公司非常重视对未成年人个人信息的保护。如您为 18 周岁以下的未成年人,请您的父母或监护人阅读本隐私政策,并在征得您父母或监护人同意的前提下使用本服务或向我们提供您的个人信息。如您的监护人不同意您按照本隐私政策使用本服务或向我们提供您的个人信息,请您立刻终止使用本服务并及时通知本公司删除您的个人信息。

- If you are the parent or guardian of a minor, if you have any concerns about the information treatment of a minor under your custody, or if a minor under your custody uses the Services or provides us with his/her personal information without your consent, please contact us through the contact information published in this *Privacy Policy* to take appropriate measures.

如您为未成年人的父母或监护人,如您对您所监护的未成年人的信息处理存在疑问,或您所监护的未成年人在未经您同意的情况使用本服务或向我们提供其个人信息,请您通过本隐私政策公示的联系方式联系我们采取相应措施。

【Cross-border Data Transfer/数据跨境传输】

Storage and Transfer of Your Personal Data. When you access or use our Services, your personal data will be stored and transferred in Singapore. This country may have data protection laws that are different in some respects or less protective than the laws of the jurisdiction in which you reside. If you do not want to transfer your information to Singapore for processing or maintenance, you should immediately stop accessing or using the Services.

- **存储和传输您的个人数据。**当您访问或使用我们的服务时,您的个人数据会在新加坡进行存储和传输。新加坡数据保护法可能在某些方面与您居住的司法管辖区的法律不同或保护性较低。如果您不希望将您的信息转移到新加坡进行处理或维护,您应立即停止访问或使用服务。
 - In such cases, we will ensure the transfer is in accordance with applicable laws and regulations (including by ensuring that overseas recipients are subject to confidentiality and data protection obligations where appropriate), as well as this *Privacy Policy*. Appropriate safeguards and security measures reflective of good industry practice and technological development in the context of *Personal Data Protection Act of Singapore* will be taken in order to protect your personal information.
- 我们确保传输将遵守适用的法律法规(包括确保海外接收者在适当情况下受到保密和数据保护义务的约束)以及本隐私政策,并采取不低于新加坡《个人数据保护法》标准的必要措施保护个人信息。

【Amendment of this *Privacy Policy*/本隐私政策的更改】

- You understand and agree that the Company has the right to amend, supplement or update this Policy from time to time and publish such amendment, supplement or update on the Services. If you choose to continue to use our Services, you are required to agree to the amended Policy again. Please pay attention to the amendment of this Policy. If you do not agree to the amended version, you shall immediately stop using the Services provided by the Company.

您理解并同意,本公司有权不时地对本政策做任何修改、补充或更新,并在本服务上予以公布。如您选择继续使用我们的服务,需重新同意本政策的修订内容。请您及时关注和了解本政策的修订情况,若您不同意修订后版本,您应立即停止使用本公司提供的服务。

【Contact Us/联系我们】

- If you need to exercise your rights above, or if you have any questions, comments, suggestions or complaints about this Policy, or if you have other concerns for which the answers cannot be found here, you may choose one of the following methods to contact us:

若您需要行使您的上述权利,或对本政策存在任何疑问或意见、建议或投诉,以及您的其他顾虑无法在此找到解答,可通过以下方式联系我们:

- E-mail Address/联系邮箱为: leyanlive2@leyantech.com

【Miscellaneous/其他】

- Notification of Operation Cessation/停止运营告知

- If the Company terminates our Services or operations, the Company will notify you at least 30 days in advance, delete or anonymize your personal information in accordance with this Policy after termination of the Services or operation.

如果本公司终止服务或运营,本公司会至少提前三十日向您通知,并在终止服务或运营后根据本政策的规定对您的个人信息进行删除或匿名化处理。

- If any provision or any part of any provision of this Policy is held invalid, illegal or unenforceable under any applicable law, the validity of any other provision of this Policy or any other part of such provision shall not be affected.

如果根据适用的法律认定本政策中的任何条款或者任何条款中的任何部分无效、违法或者不具有可执行性,不影响本政策中的任何其它条款或者这些条款中的任何其它部分的效力。

- This Policy is an effective supplement to the Service Agreement. If there is any inconsistency between the Service Agreement and this Policy on similar terms, this Privacy Policy shall prevail. Matters not covered herein shall be subject to the Service Agreement.

本政策作为服务协议的有效补充,当二者针对同类条款之约定存在不一致的,以本政策为准,未尽事宜按照服务协议约定执行。

- This Policy is written in Chinese and English. If there is any discrepancy between the Chinese and the English versions of this Policy, the Chinese version shall prevail.

本政策以中文和英文书就,若本政策中文版本与英文版本的内容有不同之处,以中文版为准。