

Privacy Policy

New Version (Effective as of August 1, 2022)

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Note: this Privacy Policy applies to the collection, use and disclosure of information in connection with the products and services offered by [MAKUKU platform]

Welcome to [MAKUKU platform]. The Platform is provided and controlled by Makuku E - Commerce Co., Ltd., with its registered address at Room Jt15919, Building 2, No.4268, Zhennan Road, Jiading District, Shanghai CN ("MAKUKU", "we" or "us").

We at [MAKUKU platform] ("**we**", "**us**") recognize the importance of privacy and confidentiality of personal information. [MAKUKU platform] (the "**Platform**") is a B2B platform which connects and facilitates sales and purchases of products and/or services between suppliers (or "**Sellers**") and buyers (or "**Buyers**"). The Platform is for business to business transactions and therefore is only made available for use by businesses and not for individual or personal use. This Privacy Policy sets out the ways in which [MAKUKU platform] collect, use and disclose information in connection with its operation of the Platform including personal information about Platform visitors and representatives and employees of Buyers and Sellers ("**you**"). This Privacy Policy also applies to use of our Platform via a mobile device, either through mobile applications or mobile-optimized websites. For details of the personal information that we collect when you use or interact with other MAKUKU services, please refer to the applicable Privacy Policy to those services.

If you have any questions or concerns about the use of your personal information, then please contact us using the contact details provided at section [1 "**HOW TO CONTACT US**"] the bottom of this Privacy Policy.

A. COLLECTION OF INFORMATION

The personal information that we may collect about you broadly falls into the following categories:

Information you provide to us

If you are a representative or employee of any Buyer or Seller or a sole trader Buyer or Seller:

- you will be asked to provide certain contact information that is necessary for the registering for a Platform

account on behalf of a Buyer or Seller, including name, address, phone number, email address, job title and department;

- you will be asked to provide certain identity information, tax registration and/or related information about your business, such as your company name, business type and industry, corporate registration details and information about your business license;
- if you are a Seller we will also ask you to provide details about the goods and products that you intend to sell via the Platform and details about your sales/transactions on [MAKUKU platform];
- if you are a Buyer we will also ask you to provide details or preferences about the goods and products that you may be interested in buying via the Platform and any details or preferences relevant to your purchases;
- in connection with the facilitation of transactions, purchases and payments over the Platform, you will be asked to provide certain payment information. This might include bank account numbers, billing and delivery information, credit/debit card numbers, expiration dates and security code and tracking information from cheques or money orders to facilitate the sale and purchase as well as the settlement of purchase price of the products or services transacted on or procured through the Platform;
- we will process any information provided to us in connection with disputes or to support complaints in connection with the Platform or goods and/or services purchased via the Platform. Please note, Buyers and/or Sellers may submit complaints regarding the products and services on the Platform and/or disputes between the Buyers and Sellers to the Platform and under such circumstances, we will process data provided to us by Buyers and/or Sellers that is relevant to the disputes or complaints submitted. This may include health data of end-users (which may include minors as applicable) of products purchased on the Platform to the extent relevant to the disputes or complaints that are being reviewed by the Platform and to the extent that the individual(s) has provided their explicit consent to their data being shared with us for the purposes of handling the complaints and/or settling the disputes.
- Information you submit to the Platform for publication may be made publicly available on the Platform and therefore accessible by any internet user. You should exercise caution when deciding what information you submit to us for publication.
- in order to facilitate your use of the services available on the Platform (including on websites and/or mobile applications), we may request for access to, and you may provide us with, contents stored in your devices including but not limited to contacts in address book, photos, videos and/or other files. If you are using our communication tools on the Platform (particularly in case of voice communication), we may require access to your camera and/or microphone, and may conduct voice recordings.

Information that we collect automatically

- If you contact us (such as via our customer services department chat service, telephone or email), we may record a copy of your correspondence and may ask for additional information to verify your identity.
- We will collect contact details and other information of users from publicly available sources for the purposes of verifying the users and performing due diligence on the users.
- We will collect details of user activities, transactions and interactions on the Platform including information relating to the types and specifications of the products and services purchased, pricing and delivery information, dispute and complaint records, communications between users and any information disclosed in any discussion forum.
- From time to time, we may also collect information about the existing and prospective users, during or in connection with trade shows, industry events and/or other functions. Including representative contact names, addresses, phone numbers, fax numbers and email addresses.
- If you visit our Platform, we will automatically collect certain information from your device. In some

countries, including countries in the European Economic Area, this information may be considered as personal information under applicable data protection laws. Specifically this information may include IP addresses, device type, unique device identification numbers, browser type, geographic location, browsing patterns and details of how you have interacted with our Platform and the goods and services available on it. In addition, we gather statistical information about the Platform and visitors to the Platform including, browser software, operating system, software and hardware attributes, pages viewed, number of sessions and unique visitors. Collecting this information enables us to better understand the visitors who come to our Platform, where they come from, and what content is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Platform.

Information that we receive from third parties

We may receive personal information about you from social media platforms if you choose to register for a Platform account via a social media account. Exactly what information we receive will depend on your privacy settings with the applicable platform, but it would typically include basic public profile information such as:

- Your user name or nickname
- Your profile picture
- Country
- Company name
- Contact details

We may receive personal information about you from third parties that are engaged by us to assist with providing verification services, and conducting suitable money laundering and KYC (know-your-customer) checks on users, and to improve our marketing efforts. This may include your name, email address, company details and contact information for company representatives.

If you choose to participate in reviewing or rating products and/or services on [MAKUKU platform], we may receive personal information about you from third parties that work with us to conduct reviews into our services and/or rate us.

B. USE OF PERSONAL INFORMATION

We collect and use your personal information for the following purposes:

- verifying your identity and conducting security, KYC (know-your-customer) and anti-money laundering diligence and background checks in order to set up user accounts;
- verifying your eligibility to register as a Platform user in accordance with our Terms of Use;
- setting up / administering user accounts, including providing log-in IDs and developing a Platform profile;
- providing users with customer service support; responding to queries, feedback, and managing claims and/or disputes;
- facilitating communication between Buyers and Sellers via the Platform, processing transactions and settlement between Buyers and Sellers made over the Platform, assessing fund withdrawal requests from Sellers;
- providing logistics and warehousing services (including, without limitation, customs clearance declarations via the Platform);
- facilitating customs clearance declarations / applications via the Platform;
- assessing and monitoring account security and transaction risks of users of [MAKUKU platform], detecting and preventing fraud, money laundering and other security incidents;
- sending and serving tailored marketing and advertising that we believe will be of interest to you based on the ways in which you use the Platform, your browsing records, and order history;

- performing research or statistical analysis in order to improve the content and layout of the Platform, and to improve the product offerings and services on [MAKUKU platform], including, for example, using anonymized data for machine learning purposes;
- identifying, developing and marketing and advertising products and services that we believe you will value, including across browsers and devices, in accordance with applicable laws. Where we are required by applicable law, we will seek your consent prior to sending you communications for marketing purposes;
- if you are a Buyer, we will share details of the last viewed products on the Platform to enable Sellers, their respective affiliates and/or their third-party services provider to contact you with details of products and/or services that might interest you. You can opt not to share this information with Sellers via the Buyer Privacy Settings.
- when you use services that require access to contents stored in and/or functions on your devices (including but not limited to contacts in address book, photos, videos, microphone and/or camera), we use your photos, videos, contact information in your address book, and other personal information to respond to your requests, provide the requested services to you, and improve our services.
- We may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

C. DISCLOSURE OR SHARING OF PERSONAL INFORMATION

We may disclose (or provide access to) personal information to the following categories of recipients:

- Other Platform Users where necessary in connection with the facilitation of purchases and communications made between you and the other users.
- Third party business partners, service providers and/or affiliates of [MAKUKU platform] engaged by us or working with us to assist us to provide services to you or who otherwise process personal information for purposes described in this Privacy Policy or notified to you when we collect your personal information.

Categories of these partners or service providers include:

- Members of MAKUKU Group and their respective affiliates and/or their designated service providers that work with us to provide processing services such as software, tools, systems and messaging services for purposes described in this Privacy Policy;
- our business partners (for example, in order for them to provide you with discounts or offers that may interest you);
- marketing and advertising platforms, such as Google, Twitter, Facebook and Instagram, and providers of analytics services relating to users' behavior, in order to tailor the content you see when visiting our Platform. These platforms may combine information they collect on our Platform with data on their platforms and data they collect from other websites or through other sources in order to conduct targeted advertising. The processing activities of these third party marketing platforms are governed by their own privacy policies, not this Privacy Policy;
- payment service providers who collect and process personal information to assist with settling the payments for transactions or process withdrawal requests for Sellers. The activities of payment service providers may be governed by their own privacy policies, not this Privacy Policy;
- logistics partners for providing delivery services for Buyers, including return and exchange of products, and warehousing services for Sellers;
- custom agents for customs clearances purposes;
- cloud computing service providers to provide cloud storage services;

- customer service providers to provide after-sale services;
- risk control service providers to assess the security of users' accounts and transaction risks; and
- third party rating / reviewing service providers to carry out reviews of our services with customers if you choose to participate in reviewing or rating [MAKUKU platform] products and/or services;
- To our professional advisers, law enforcement agencies, insurers, government and regulatory and other organizations where we believe it is necessary to comply with applicable laws or to exercise, establish or defend our legal rights or protect your vital interests or those of any other person, we may also disclose and transfer your personal information or as otherwise required or permitted by applicable laws.
- To an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.
- To any other person with your consent to the disclosure.
- We may provide aggregated or anonymized data to third parties, but when we do so, the information we share is in a de-identified format that does not personally identify you.

In order to ensure the stable operation of our "[MAKUKU platform]" app or realize relevant functions, we may access the software development kit (SDK) provided by a third party to achieve the above purpose. We will perform our prudent obligation to strictly monitor the security of the software development kit (SDK) used by our partners to obtain information to protect data security.

The third-party SDK we access mainly serves the needs of you and the enterprises you represent. Therefore, we may adjust the third-party SDK we access when meeting new service needs and business function changes. We will promptly disclose to you the latest situation of accessing the third-party SDK in this Privacy Policy.

Unless otherwise specified below, the third-party SDK and related information currently accessed by our "[MAKUKU platform]" app are listed as follows:

Youmeng+	
Operator	Youmeng+
Function	Youmeng+ is based on excellent technical and algorithmic capabilities, combined with real-time global data resources, to provide statistical analysis, operation and technical efficiency improvement tools for Internet enterprises, and to provide online and offline digital intelligence marketing services for brand owners, so as to help the continuous growth of business.
Type of personal information collected	Youmeng device ID, IP address, network access type, APP installation channel and version, device operator, device operating system, active user, new user, number of crashes, user tag (gender, age, region)
Privacy policy link	https://www.umeng.com/page/policy

D. RETENTION

We retain your personal information as long as we have an ongoing legitimate business need to do so for example to provide services or products to you, or as required or permitted by applicable laws, such as tax and accounting laws.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it 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.

The personal data we collect from you may be stored on a server located in [China], outside of the country where you live. We maintain major servers around the world to bring you our services globally and continuously.

E. Your Rights and Choices

You can access and edit most of your profile information by signing into [MAKUKU platform]. You can delete the User Content you uploaded. Should you choose to do so, you may delete your entire account in Settings. You may also be afforded certain rights under applicable laws, which may include the right to access, delete, update, or rectify your data, to be informed of the processing of your data, to file complaints with authorities, and potentially other rights. If you have any questions on how to use the above tools, want to know about what rights you may have or want to exercise them, or have any requests, inquiries, or complaints, please contact us at: [jason.tang@makuku.com]

F. MINORS

The Sites and their contents are not targeted to minors (those under the age of 18) and we do not intend to sell any of our products or services to minors. If a minor has provided us with Personal Data without parental or guardian consent, the parent or guardian should contact DataProtection.[jason.tang@makuku.com] to remove the information.

In certain cases this age may be higher due to local regulatory requirements, please see your local privacy policy for more information. If you believe that we have personal data about or collected from a child under the relevant age, contact us at: [jason.tang@makuku.com].

G. SECURITY MEASURES

We employ commercially reasonable security methods to prevent unauthorized access to the Sites, to maintain data accuracy and to ensure the correct use of the information we hold.

For registered users of the Sites, some of your information can be viewed and edited through your account, which is protected by a password. We recommend that you do not divulge your password to anyone. Our personnel will never ask you for your password in an unsolicited phone call or in an unsolicited email. If you share a computer with others, you should not choose to save your log-in information (e.g., user ID and password) on that shared computer. Remember to sign out of your account and close your browser window when you have finished your session.

No data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we try to protect the information we hold for you, we cannot guarantee the security of any information you transmit to us and you do so at your own risk.

H. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws. Any changes to this Privacy Policy will be communicated by us posting an amended Privacy Policy on the Platform. Once posted on the Platform, the new Privacy Policy will be effective immediately. You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

I. HOW TO CONTACT US

You can click hereto exercise your rights, and If you have any requests, questions or concerns about our use of your personal information and this Privacy Policy, please contact us at[jason.tang@makuku.com].

J. LANGUAGE

If there is any conflict between the English version and another language version of this Privacy Policy, the English version shall prevail.

K. Supplemental Terms – Jurisdiction-Specific

In the event of a conflict between the provisions of the Supplemental Terms – Jurisdiction-Specific that are relevant to your jurisdiction from which you access or use the services, and the rest of policy, the relevant jurisdictions' Supplemental Terms – Jurisdiction-Specific will supersede and control.

Indonesia

If you are using our services in Indonesia, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall apply.

Age, Parental and Guardian Consent. By accessing and/or using this Platform, you represent that you are at least 21 years of age or married or not under guardianship. If you are below 21 years old and you are not married, or under guardianship:

- you must obtain approval from your parent(s) or legal guardian(s); and
- your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Platform; (ii) your compliance with this policy; and (iv) ensuring that any of your participation in the Platform will not, in any event, result in any violation of applicable laws and regulations relating to child protections.

If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or guardian(s) is not willing to open the account under their name, you must cease accessing the Platform.

Your Choices. You may withdraw your consent to [MAKUKU platform] disclosure of personal data to third parties. Upon your request, we will ease to display, publish, transmit, disseminate, and/or open the access to your personal data to third parties. Please note that by withdrawing your consent to the disclosure and/or collection of your personal data, we may not be able to fulfill your requests and you may not be able to use some of [MAKUKU platform] features and functionality.

You may request [MAKUKU platform] to (i) disclose history of personal data that we have collected; and/or (ii) erase and dispose your personal data that we have collected on our server. Please note that by requesting us to erase and dispose your personal data, you may not be able to use some of [MAKUKU platform] features and functionality.

To exercise any of your rights, contact us at: [jason.tang@makuku.com].

Notification. In the event of any breach of personal data, we will notify you and provide you with information regarding such breach of personal data.

Data retention. We retain your information for as long as it is necessary to provide you with the service. Where we do not need your information in order to provide the service to you, we retain it only for so long as we have a legitimate business purpose in keeping such data. However, there are occasions where we are likely to keep this data for five (5) years (or longer if required) in accordance with our legal obligations or where it is necessary for the establishment, exercise or defence of legal claims.

After you have terminated your use of our Platform and the five (5) years retention period has lapsed, we store

your information in an aggregated and anonymised format. Non-personally identifiable information may be retained indefinitely for analytics.

Philippines

If you are using our services in Philippines, the following additional terms shall apply pursuant to the relevant laws, rules and regulations and issuances by the Philippines National Privacy Commission (“NPC”) on data privacy.

Your Rights. To the extent that the relevant laws, rules and regulations on data privacy recognize your rights and freedoms as data subjects, you shall have the right to information, object, access, rectification, erasure or blocking, lodge complaints before the NPC, damages and data portability. Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.