

# Getui User Privacy Policy

This policy is only applicable to the Getui Push Service of Zhejiang Merit Interactive Network Technology Co., Ltd. (hereinafter referred to as "Getui"). Last updated: September 30, 2019.

If you have any questions, comments or suggestions, please contact us using the contact details below:

- Email: support@getui.com
- Phone: 4006-808-606
- Fax: 0571-86473223

**This policy will help you understand the following:**

- 1. How do we collect and use your personal information?
- 2. How do we share, transfer, and publicly disclose your personal information?
- 3. How do we protect your personal information?
- 4. Your rights
- 5. Children's personal information protection
- 6. How to update this policy

Please read, understand and agree to accept this privacy policy before using the Getui push service. If you do not agree to this policy, please stop using the Getui push service immediately.

## **1. How do we collect and use your personal information?**

(a) Getui will only collect and use your personal information for the functions described in this policy:

### **1. Create the user ID required for the push service**

In order to create the user ID, we may need to collect the following information: device identifier (such as IMEI, Android ID, device serial number, MAC, Android Advertisement ID, IMSI and other device related information). This information will be used to generate unique push target id, id est, the CID.

### **2. Optimize message push capability**

We may need to collect the following information, which will help us to provide you with better push services and experiences, such as the use of vendor system push capabilities: device manufacturer, device brand, device model, Android version, Rom information, etc. However, if this information cannot be collected, it will not affect the basic functions of this push service.

### **3. Smart push function**

In order to implement the smart push function, based on the user portraits for refined push operation, we may need to collect the following information: installed packages, and active packages information. We analyze your interests by using above information, and can recommend push content that better suits you, which will reduce unnecessary bothering push message to you.

### **4. Location-based push function**

In order to implement message push based on the user's offline scene, we may need to collect the following information: network identity information (including IP address, MAC address) and location based information (WIFI list, latitude and longitude, base station information, MAC). It helps you to provide a refined push based on offline scenes, and recommend push content that better suits you, which will reduce unnecessary bothering push message to you.

The above information provided by you will continue to be authorized for use during your use of the push service. When you stop using the push service, we will stop using and delete the above information.

The above information will be stored on servers in the People's Republic of China. For cross-border transmission, we will ask for your authorization.

When we want to use the information for other purposes not covered by this policy, we will ask for your consent in advance.

When we want to use information collected for a specific purpose for other purposes, we will ask for your consent in advance.

(b) Exceptions for obtaining authorization:

Please understand that in accordance with laws, regulations and relevant national standards, we collect and use your information without the consent of your authorization:

1. Directly related to national security and national defense security;
2. Directly related to public safety, public health, and major public interests;
3. Directly related to criminal investigation, prosecution, trial and judgment execution;
4. When it is difficult to obtain the consent of the person for the protection of the life and property of you or other individuals;
5. The collected information about you is disclosed to the public by yourself;
6. Your personal information collected from legally publicly disclosed information, such as legitimate news reports, government information disclosure, etc.;
7. When it is necessary to maintain the safe and stable operation of software and related services, such as faults in discovering and disposing of software and related services;
8. When an academic research institution conducts statistical or academic research based on public interest and provides academic research or description results, the personal information contained in the results is anonymized;
9. Other circumstances as stipulated by laws and regulations.

## **2. How do we share, transfer, and publicly disclose your personal information?**

(a) Sharing

We do not share your personal information with any company, organization or individual other than Getui, except in the following cases:

- Share with explicit consent: We will share it with other parties under your explicit consent.
- We may share it in accordance with laws and regulations or in accordance with the mandatory requirements of the competent government authorities.
- Sharing with our affiliates, we will only share the necessary information and will be bound by the purposes stated in this Privacy Policy. If the subsidiary wants to change the purpose of processing the information, we will ask for your authorization again.
- Sharing with Authorized Partners: For the purposes stated in this policy, we may share certain of your personal information with our partners. We only share information for legitimate, necessary, and specific purposes, and we only share the information necessary to provide the service, and our partners do not have the right to use the shared information for any other purpose. Our authorized partners include the following types: advertisers, media and other partners. We will use the desensitized data processed and processed by the Getui data platform for commercial use including optimizing advertising and improving marketing effects. For companies and organizations with which we share information, we will enter into a

strict confidentiality agreement with them to process personal information in accordance with our instructions, this Privacy Policy, and any other relevant confidentiality and security measures.

(b) Transfer

We will not transfer your personal information to any company, organization or individual except in the following cases:

- 1. Transfer with explicit consent: After obtaining your explicit consent, we will transfer it to other parties;
- 2. When it comes to enterprise mergers, acquisitions or bankruptcy liquidation, if it involves the transfer of your personal information, we will ask the new company and organization to continue to be bound by this privacy policy, otherwise we will ask the company and organization to ask for your consent again.

(c) Public disclosure

We will only publicly disclose your personal information in the following cases:

- 1. After obtaining your explicit consent
- 2. Disclosure based on law: We may disclose it publicly in the case of laws, legal procedures, litigation or mandatory requirements of the competent government authorities.

(d) Exceptions for prior authorization of consent when sharing, transferring, and publicly disclosing information

Please understand that in accordance with laws and regulations and relevant national standards, we share, transfer, and publicly disclose your information without the consent of your authorization:

- 1. Directly related to national security and national defense security;
- 2. Directly related to public safety, public health, and major public interests;
- 3. Directly related to criminal investigation, prosecution, trial and judgment execution;
- 4. When it is difficult to obtain the consent of the person for the protection of the life and property of you or other individuals;
- 5. Information that you disclose to the public by yourself;
- 6. Information collected from legally publicly disclosed information, such as legal news reports and government information disclosure.

### **3. How do we protect and store your personal information?**

- (a) We have used industry-standard security measures to protect your personal information from unauthorized access, public disclosure, use, modification, damage or loss. We will take all reasonable and practicable steps to protect your personal information. For example, we deploy access control mechanisms to ensure that only authorized person have access to personal information; and we conduct security and privacy protection training courses to enhance employee awareness of the importance of protecting personal information.
- (b) We have obtained the following certifications: Information System Security Level Protection Level 3 certificate, and ISO9001 certification.
- (c) Our data security capabilities: We will establish a data classification system, a data security management specification, and a data security development specification to manage the storage and use of standardized information.
- (d) We will take all reasonable and feasible measures to ensure that irrelevant information is not collected. We will only retain your personal information for the period of time required to achieve the purposes described in this policy, unless we need to extend the retention period or be permitted by law.
- (e) The Internet is not an absolutely secure environment, and email, instant messaging, and communication with other users are not encrypted. We strongly recommend that you do not

send information in this way. Please use complex passwords to help us keep your account secure.

- (f) The Internet environment is not 100% secure and we will do our best to ensure or guarantee the security of any information you provide to us. If our physical, technical, or administrative protective equipment is destroyed, resulting in unauthorized access, public disclosure, alteration, or destruction of information, resulting in damage to your legal rights, we will bear the corresponding legal responsibility.
- (g) After we take necessary and reasonable security measures, we still unfortunately have security incidents such as information disclosure. We will promptly inform you according to the requirements of laws and regulations: the basic situation and possible impact of security incidents, we have taken or disposal measures to be taken, suggestions for your own prevention and risk reduction, remedial measures for you, etc. At the same time, we will also report the handling of information security incidents in accordance with the requirements of the regulatory authorities.

#### **4. Your rights**

In accordance with relevant laws, regulations, standards in China and other countries and regions, we guarantee that you exercise the following rights to your personal information:

##### **(a) Access information**

You have access to your personal information, except as provided by laws and regulations.

If you want to exercise data access, you can do the following:

Personal Information Protection Email: [support@getui.com](mailto:support@getui.com)

Address: Floor 4, Bldg. 1, Fudi Park 2.0, Xidoumen Road No.9, Xihu District, Hangzhou, Zhejiang, China

You can also contact us at any time by visiting <https://www.getui.com/> online customer service or by calling one of our customer service numbers.

We will respond to your request within 30 days.

For other personal information that you generate during the use of our products or services, we will provide you with as far as we could. If you would like to exercise data access, please send an email to [support@getui.com](mailto:support@getui.com).

##### **(b) Correcting information**

You have the right to ask us to make corrections when you find that we have processed an error about your personal information. It can be done in the following ways:

Personal Information Protection Email: [support@getui.com](mailto:support@getui.com)

Address: Floor 4, Bldg. 1, Fudi Park 2.0, Xidoumen Road No.9, Xihu District, Hangzhou, Zhejiang, China

You can also contact us at any time by visiting <https://www.getui.com/> online customer service or by calling one of our customer service numbers.

We will respond to your request within 30 days.

For other personal information that you generate during the use of our products or services, we will provide you with as long as we do not need to invest too much. If you would like to exercise data access, please send an email to [support@getui.com](mailto:support@getui.com).

##### **(c) Deleting information**

In the following situations, you can ask us for a request to delete information:

- 1. If we deal with information in violation of laws and regulations;
- 2. If we collect and use your personal information without your consent;
- 3. If we deal with information, which violates the agreement with you;
- 4. If you no longer use our products or services, or you delete your account;
- 5. If we no longer provide products or services for you.

If we decide to respond to your removal request, we will also notify the entity from which we obtained your personal information and request that it be removed in a timely manner,

unless otherwise required by laws and regulations, or if these entities obtain your independent authorization.

When you delete information from our services, we may not immediately delete the corresponding information in the backup system, but will delete it when the backup is updated.

(d) Change the scope of your authorization

Each business function requires some basic personal information to be completed (see "Part 1" of this policy). You may give or withdraw your authorization consent at any time for the collection and use of additional collected personal information.

You can do it yourself in the following ways:

Personal Information Protection Email: [support@getui.com](mailto:support@getui.com)

Address: Floor 4, Bldg. 1, Fudi Park 2.0, Xidoumen Road No.9, Xihu District, Hangzhou, Zhejiang, China

You can also contact us at any time by visiting <https://www.getui.com/> online customer service or by calling one of our customer service numbers.

We will respond to your request within 30 days.

(e) Cancellation of accounts

You can cancel your previously registered account at any time, you can do it yourself:

Personal Information Protection Email: [support@getui.com](mailto:support@getui.com)

Address: Floor 4, Bldg. 1, Fudi Park 2.0, Xidoumen Road No.9, Xihu District, Hangzhou, Zhejiang, China

You can also contact us at any time by visiting <https://www.getui.com/> online customer service or by calling one of our customer service numbers.

We will respond to your request within 30 days.

After canceling the account, we will stop providing you with products or services, and delete your personal information according to your requirements, except as otherwise provided by laws and regulations.

Respond to your request above

To be safe, you may need to provide a written request or otherwise prove your identity. We may ask you to verify your identity before processing your request.

We will respond within thirty days. If you are not satisfied, you can also complain through the following channels:

Personal Information Protection Email: [support@getui.com](mailto:support@getui.com)

Address: Floor 4, Bldg. 1, Fudi Park 2.0, Xidoumen Road No.9, Xihu District, Hangzhou, Zhejiang, China

You can also contact us at any time by visiting <https://www.getui.com/> online customer service or by calling one of our customer service numbers.

We will respond to your request within 30 days.

In principle, we do not charge a fee for your reasonable request, but we will charge a certain fee for the repeated requests that exceed the reasonable limit. For those who are unreasonably repetitive, need too much technical methods (for example, need to develop new systems or fundamentally change existing practices), pose risks to the legal rights of others, or are very impractical request (for example, involving information stored on backup tapes), we may refuse.

## 5. Children's personal information protection

Our push service is for adults and does not accept children using push services.

For the collection of children's personal information with or without parental consent, we will only retain, use or publicly disclose this information if it is permitted by law, with the explicit consent of the parent or guardian or the protection of the child, otherwise we will try to delete the relevant data as soon as possible.

## **6. How to update this policy**

Our Privacy Policy may be changed, and we will have the right to make timely adjustments and re-release of this Privacy Policy based on actual operations and performance. If you do not agree to the changes made to the terms of this policy, please stop using the push service. If you choose to continue using the push service, you are deemed to have accepted the adjustments to the terms of this policy.

We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any changes to this policy on this page.

For major changes, we also provide more noticeable notices (including for certain services, we will send a notification via email stating the specific changes to the privacy policy).