

# **GUGU SECURITIES, Inc.**

## **PRIVACY POLICY**

This Privacy Policy governs the collection, processing, use, maintenance and disclosure of information of its users (hereinafter the “User” or “You”) by [ ] (hereinafter the “Company”) on this website ([ ], hereinafter the “Website”). This Privacy Policy is applicable to the Website and all products and services (hereinafter the “Services”) provided by the Company. Upon your visit to the Website and your purchase or use of any Services of the Company, you shall be deemed to have accepted the operation and policy of this Privacy Policy.

### **1. SCOPE OF APPLICATION OF PRIVACY PROTECTION POLICY**

The Privacy Policy includes how the Website processes personal, identifiable information (“Personal Information” or “Personal Data”) collected when you use the Services. The Privacy Policy is not applicable to relevant external webpages linked to the Website, nor is it applicable to any person who is not mandated by this Website or participates in its management.

### **2. MANNER OF COLLECTION, PROCESSING AND USE OF PERSONAL INFORMATION**

2.1 When you use this Website or any Services that it provides, we shall, depending on the nature of the relevant service and function, ask you to provide necessary Personal Information and shall process and use your Personal Information to the extent of such purpose. The Website shall not use Personal Information for any other purpose without your consent (including but not limited to consent by email or webpage click, etc.)

2.2 Types and purposes of our collection, processing, and use of your Personal Information:

- (1) Types: we collect the following types of your Personal Information:
  - (a) Identity Data, such as your name, date of birth, marital status, social security number, biometric identifiers, and other data on government-issued identification documents;
  - (b) Contact Data, such as your email address, mailing address, and telephone number;
  - (c) Financial Data, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;

- (d) Profile Data, such as your username and password, your knowledge assessment results, your interests, preferences, feedback, and survey responses;
  - (e) Stored Content, such as photos from your mobile phone gallery or contacts stored in your mobile device or email accounts. We only collect this information with your permission;
  - (f) Additional Data You Provide, such as via focus groups, survey responses, contests/sweepstakes, customer support, or other means; and
  - (g) Automatically collected through the Services, such as (i) Usage information such as device identifiers, the identifier for advertisers ("IDFA"), operating system and version, carrier and network type, internet protocol addresses ("IP address"), browser type and language, referring and exit pages and uniform resource locators (date and time, amount of time spent on particular pages), what features of the Services you use or visit, purchases, and similar information regarding your use of the Services; (ii) Geolocation data from your mobile device, wireless carrier, or third-party service providers; you may control the collection of precise geolocation data through the user settings on your device; (iii) Activity data, such as purchases/sales, amount, type of transaction, time and data, and similar activity through the Services; (iv) Tracking data collected using first and third-party cookies, pixels, web server logs, web beacons, and similar data collection and tracking technologies, such as IP address, browser, type, internet service provider ("ISP"), platform type, device type.
- (2) Purpose: We collect, process, and use your Personal Information for the following purposes:
- (a) Maintain and provide the Services, including processing account applications, authenticating your identity, repairing our Services, support, and handling billing and account management;
  - (b) Send you transactional or relationship information, including confirmations, invoices, technical notices, customer support responses, software updates, security alerts, support and administrative messages, and information about your transactions;
  - (c) Communicate with you about offers and other things we think you will be interested in, such as newsletters, product announcements, partner offerings, surveys, contests or sweepstakes, events, or announcements;
  - (d) Personalize our Services, such as by suggesting content or customizing content or ads we show you;
  - (e) Monitor and improve our Services, including analyzing usage, research and development;
  - (f) Facilitate contests, sweepstakes, and promotions and process and deliver entries and rewards;
  - (g) Help protect the safety and security of our Services, business, and users,

such as investigating and helping prevent fraud or other unlawful activity;

- (h) Protect or exercise our legal rights or defend against legal claims, including enforcing and carry out contracts and agreements; and
- (i) Comply with applicable laws and legal obligations, such as compliance obligations associated with being a regulated broker-dealer.

2.3 We will process and use your Personal Information until (i) We cease to provide Services and this Website, or (ii) you explicitly request us to cease to process and use your Personal Information by contacting us through the contact information referred to in this Privacy Policy.

### **3. INFORMATION PROTECTION**

We use reasonable security protection measures to protect your Personal Information (such as a firewall, and identity verification system) and to prevent loss or theft of unauthorized access, disclosure, reproduction, use, or alteration. However, please note that no system that transmits data through the internet or stores data electronically is absolute security. We strictly protect and store your Personal Information and therefore undertake all reasonable steps to ensure the confidentiality, integrity, and availability of your Personal Information. However, we shall not be liable for any loss, theft, unauthorized viewing, disclosure, reproduction, use, or alteration of your Personal Information beyond our reasonable control.

**INFORMATION SHARING AND DISCLOSURE** This Website shall never provide, exchange, lease or sell any of your Personal Information to any other individual, organization, private enterprise, or public authority, other than in accordance with the law or contract obligations. The situations under the above proviso include but are not limited to the following:

- (1) With your consent, including consent by email, webpage click, etc.
- (2) Express stipulation of the law.
- (3) To avoid danger to your life, limb, freedom, or property.
- (4) In cooperation with a government authority or academic research institution, necessarily based on public interest and for statistical or academic research, in which case the information shall have been processed or collected and disclosed in a manner by the provider that renders them not personally identifiable of any specific subject.
- (5) Your conduct on the Website breaches the Terms and Conditions of the Services, or may damage or interfere with the interest of any other use or results in any

harm to any person, and the website administrator determines that the disclosure of your Personal Information is required for identification, contact or legal action.

(6) For the benefit of your interest.

## **ADVERTISEMENT**

Our Website may show advertisements from third-party advertisers, which may be sent to users with Cookie setups. These Cookies allow advertisers' servers to identify your computer every time an online advertisement is sent to you and edit any non-personal information about you or the user of your computer. This information shall allow advertisers to send specific advertisements that they believe shall interest you. This Privacy Policy does not include the use of Cookies or any conduct of these advertisers. You have several options to control or restrict how we or any third party can use Cookies and similar technologies, including their use in advertisements. For example, you can configure the preferences in your browser to remove these profiles and advertising Cookies at any time.

## **6. THIRD-PARTY WEBSITE**

The Company's websites or services may show links to websites or services provided by third parties. These websites and services are not operated or managed by the Company. Before accessing, clicking on, or using these websites or services, users shall first understand the terms and conditions for users or privacy policies established by the providers of these websites or services. Once you use any Services provided by our Company, you shall be deemed to have accepted the terms and conditions for users or privacy policies provided by third parties. These websites and services are beyond the scope of application of this Policy. The Company shall not undertake any legal liability for the collection or use of personal data by third-party websites or services. The platforms used by the Company, including but not limited to third-party log-in services and content-sharing platforms, are listed on the official website.

## **7. UPDATE OF PRIVACY POLICY**

We will verify our Privacy Policy and its compliance regularly. Our Privacy Policy may change with the lapse of time. In case of any change, we will update our Privacy Policy on the website and the changes of relevant information will be published. We encourage users to check this webpage regularly. Also, you shall understand and agree that you have the responsibility to check this Privacy Policy regularly.

## **8. YOUR CONSENT TO THE PRIVACY POLICY**

In using this Website, you shall be deemed to have accepted our latest Privacy Policy. If you do not agree with the stipulations of our Privacy Policy or if you refuse to provide your Personal Information, you can stop the use of services provided through the Website. Otherwise, we will not be able to provide you with services of full functions. In addition, if we believe that you have failed to comply with the Privacy Policy or that you have not provided full Personal Information, we reserve the right to terminate or suspend the provision of relevant Services for you.

## **9. WARRANTY ABOUT YOUR PRIVACY**

To ensure the security of your information and the implementation of the Privacy Policy, we shall propagate these policies and requirements to our employees and reinforce the protection of Personal Information from the employees to protect your interest.

## **10. YOUR RIGHTS**

10.1 We respect the Personal Information that you provide. About any Personal Information that you have provided to us, you can contact our customer service to exercise the following rights:

- (1) Make an inquiry or request to review your Personal Information
- (2) Request to access or output your personal information.
- (3) Request to edition or deletion of your personal information.
- (4) Request to make duplications of your Personal Information.
- (5) Request to make supplement or correction of your Personal Information.
- (6) Request to suspend the collection, processing or use of your Personal Information.

10.2 You agree that, in exercising the above rights, you shall comply with the procedures and regulations required by the Company. The Company may also confirm whether to agree to your request within 10 days from the date of your request (with the possibility to extend another 10 days if required), except if there are any of the following events:

- (1) Jeopardy to national security, diplomatic or military secret, overall economic interest, or other major state interest.
- (2) Jeopardy to the performance of legal duties by government authorities.
- (3) Jeopardy to major interest of the collecting authority or third party.
- (4) When you exercise your rights under this article, the Company may collect a reasonable charge.

## **2. CONTACT US**

If you have any questions about this Privacy Policy, the data processing, or the operation of this Website, please contact us at:

This Privacy Policy was last updated on May xx, 2022.