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# Privacy Policy

Effective date: February, 27, 2023

## Welcome to the official website of QAX Technology Group Inc.!

QAX Technology Group Inc. (office address: QAX Security Center, No. 26, Xizhimenwai South Road, Xicheng District, Beijing; Tel: 95015; hereinafter referred to as “we/us” or “QAX”) fully understands the importance of privacy and personal information to users (hereinafter referred to as “you”) and will take adequate and appropriate actions to ensure the security of your personal information.

We hope to explain to you through the Privacy Policy (hereinafter referred to as the “Policy”) how we process (collect/use/store/provide/etc.) and protect your personal information when you visit our website and use related services in the People’s Republic of China (hereinafter referred to as “China”). **Terms herein that may have a significant relationship with your legitimate interests have been boldly drawn to your attention. Please read and understand the Policy carefully before use and visit our website and use related services after you confirm that you have fully understood and agreed to the Policy. We may process your personal information without your consent if permitted by law.** If you have any questions, opinions, or suggestions about the content of the Privacy Policy, you may contact us through the contact information provided herein (see Part XI below).



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The Privacy Policy will help you understand the following:

- A. How we collect and use your personal information
  - B. How we use cookies and similar technologies
  - C. How we store your personal information
  - D. How we share, transfer, and publicly disclose your personal information
  - E. How we protect your personal information
  - F. Your rights
  - G. How to transfer your personal information globally
  - H. Protection of children's personal information
  - I. Scope of application of the privacy policy
  - J. Changes and amendments to the privacy policy
  - K. How to contact us
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## **A. How we collect and use your personal information**

We will collect and use your personal information for the following purposes and rules. If you do not provide relevant information or agree with us to collect relevant information, you may not be able to enjoy some of the services we provide or achieve good service results.

### **(I) Personal information collection rules**

#### **1. Main collection/use scenarios**

##### **1.1 Respond to your request**

You can submit project consultation requests online through this website. For this reason, we will collect your **name, contact number, email, company name, industry, position, and country/region**. Such information is collected to better respond to your inquiries.

##### **1.2 Security assurance**

In order to improve the security when you are using services provided by us and our affiliates and partners, protect the personal and property security of you, others or the public from infringement, better prevent phishing websites, fraud, network vulnerabilities, computer viruses, network attacks, network intrusions and other security risks, and further accurately identify violations of laws and regulations or our relevant agreement rules, we may use or integrate your equipment information, software use information and the information that our affiliates and partners have obtained your authorization or shared according to law for identity verification, detection and prevention of security incidents, and take necessary recording, auditing, analysis and disposal actions according to law.

#### **2. Exceptions to consent**

**According to relevant laws and regulations, we do not need your consent to collect your personal information under the following circumstances:**

- (1) Necessary for the performance of statutory duties or obligations;
- (2) Necessary for the conclusion and performance of the contract between you and us;
- (3) Necessary for the response to a public health emergency or for the protection of your life, health and property safety or that of other individuals in an emergency;
- (4) Where such acts as news reporting and supervision by public opinions are carried out for the public interest, and the handling of personal information is within a reasonable scope;
- (5) Process your personal information that is disclosed by yourself or has been legally disclosed



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within a reasonable range;

(6) Other circumstances stipulated by laws and administrative regulations.

## **(II) Rules for the use of personal information**

1. We will use the personal information collected to realize the website and/or service functions under the Policy.
2. Please note that you continue to authorize us to use all the personal information you provide when using this website and/or services unless you delete or refuse us to collect such information through system settings.
3. We may make statistics on the use of the website and/or services to show the overall use trend of the website and/or services. However, any of your identity information is not included in these statistics.
4. We will seek your consent in advance if your personal information will be used for other purposes not specified in the Policy, or if the information collected for a specific purpose will be used for other purposes.

## **B. How we use cookies and similar technologies**

**When you use this website, we may identify you through a small data file “cookie” to reduce your information’s entry number and frequency, thus realizing a smoother and easier user experience. Cookies usually contain identifiers, site names, numbers, and characters. Based on cookies, this website stores the data generated during your use (including data types, such as browsing history, download history, login logs, graphic verification codes, etc.).**

**We will not use cookies for any purpose other than those stated in the Policy. Most web browsers have the function of blocking cookies. You can manage or delete cookies according to your preferences and clear all cookies saved on your device at any time. If you choose to clear cookies, you need to reset the user settings every time you use your device to access this website.**

## **C. How we store your personal information**

### **(I) Storage location**

The personal information we collect and generated through this website in the China will be stored



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in China.

If it is necessary to transmit relevant personal information collected in China to overseas institutions for cross-border business, we will seek your consent separately and follow the laws, administrative regulations, provisions of relevant regulatory authorities and Part VII of the Policy. We will ensure that your personal information is adequately protected.

## **(II) Storage period**

We only store your personal information for the purposes stated in the Policy and within the time limit required by laws and regulations. We will delete or anonymize your personal information upon a necessary storage period. If your personal information is technically difficult to delete, we will no longer process your personal information in addition to storing and taking necessary security actions.

If we stop running this website, we will stop collecting your personal information in time and inform you of a notice of cessation in an announcement or similar form. We will delete or anonymize your personal information (if any) stored by us.

## **D. How we share, transfer, and publicly disclose your personal information**

We will only share, transfer, and publicly disclose your personal information with your consent or if permitted by laws and regulations.

### **(I) Share**

#### **1. Share with our affiliates**

**If our affiliates provide you or us with platforms or services, we may share your personal information with such affiliates (affiliates hereunder refer to companies that have a direct or indirect control relationship or significant influence relationship with QAX Technology Group Inc., including but not limited to QAX Legendsec Information Technology (Beijing) Inc., Beijing NetentSec Technology Co., Ltd.). We only share necessary information. Our affiliates are subject to the Policy when processing your personal information. If our affiliates want to change the purpose of processing relevant information, we will obtain your consent again.**

We will sign a strict confidentiality agreement, data processing agreement or other binding documents of the same legal nature with the companies, organizations and individuals with whom we share your personal information to clarify their responsibilities to protect your personal information and require them to process your personal information in accordance with our instructions, the Policy and any other relevant security actions.



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## **(II) Transfer**

With our business development, we and our affiliates may conduct mergers, acquisitions, asset transfer or other similar transactions. If relevant transactions involve the transfer of user information, we will inform you of the name or contact information of the receiver and require the companies, organizations and individuals that will hold users' personal information to continue to be bound by the Policy. Otherwise, we will ask the company, organization and individual to obtain your consent again.

## **(III) Public disclosure**

**Generally, we will not publicly disclose your personal information, except with your sole consent or in accordance with relevant requirements of laws and regulations.**

## **(IV) Exceptional cases**

**We may share, transfer, and publicly disclose your personal information without obtaining your consent according to relevant laws, regulations, and national standards under the following circumstances:**

- (1) It is necessary for the conclusion and performance of a contract to which the individual acts as a party;
- (2) It is necessary to perform statutory duties or obligations;
- (3) It is necessary for responding to public health emergencies or for protecting the life, health, and property safety of natural persons in emergency situations;
- (4) Where such acts as news reporting and supervision by public opinions are carried out for the public interest, and the handling of personal information is within a reasonable scope;
- (5) It is required to process personal information disclosed by individuals or otherwise legally disclosed within a reasonable range in accordance with the law.

## **E. How we protect your personal information**

We have taken industry-standard security measures to protect the personal information you provide, to prevent unauthorized access, public disclosure, use, modification, damage or loss of the data.

1. We make your personal information processing more transparent and establish a feedback channel for users to accept public supervision by releasing privacy policies.
2. We will encrypt and store personally identifiable information to ensure data confidentiality.



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3. We will deploy access control mechanisms on the server side, adopt the principle of minimum sufficient authorization for staff who may have access to your information, and periodically check the list of visitors and access records.
  4. The server system where we store your personal information is the operating system after security reinforcing. We will conduct account auditing and monitoring for server operations. If the server operating system with security problems is found, we will upgrade the server security in the first time to ensure the security of all of our server systems and applications.
  5. We organize regular trainings on laws and regulations related to personal information protection for our staff to enhance their awareness of personal information protection.
  6. If physical, technical or management protection measures are damaged unfortunately, we will promptly initiate emergency plans to prevent the expansion of security incidents, and report them to the competent national authorities in accordance with laws and regulations. In addition, we will timely inform you of the basic information, potential impact, and measures taken or to be taken by sending notifications or announcements in a reasonable and effective manner.

Please note that the Internet is not an absolutely secure environment. **Please try to use complex passwords and keep your account and password safe.** If you find your personal information leaked, especially for your account number and password, please contact us immediately via the contact information provided in the Policy so that we can take appropriate measures.

## **F. Your rights**

As required by applicable law, you may have the following rights to:

1. access to specific personal information saved by us about you;
2. request us to correct your inaccurate personal information;
3. refuse or restrict our use of your personal information;
4. request us to delete your personal information;
5. obtain a copy of your personal information.

We respect your rights to personal information to the greatest extent, so that you can make independent decisions and fully protect your privacy and personal information security. If you want to exercise relevant rights or have any question, comment, or suggestion or complaint about our privacy policy and personal information processing, you can give us feedback through the contact information in Part 11 of the Policy. If your request contains personal information that does not



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belong to you, exceeds reasonable limits, requires excessive technical means (such as the need to develop a new system or fundamentally change the current practice), or may infringe upon the legitimate rights and interests of others or may turn to be impractical, or we have other legal and legitimate reasons, we may refuse to respond to your request and explain the reasons to you. Usually, we will respond to your request within 15 working days. In case of complicated problems that need to be postponed, we will make an explanation to you within 15 working days.

The contact information you provide along with feedback will only be used for our user service hotline to communicate with you and send feedback. Except with your explicit consent and/or as expressly required by law, we will not provide your abovementioned information for any third party.

#### **G. How to transfer your personal information globally**

**In principle, personal information collected and generated by our operations within China is stored within China. We will only carry out cross-border data transmission when required by laws and regulations and when it is necessary for business development.**

**We guarantee that all cross-border transmission of your personal information will be carried out based on full notice to you and obtaining your separate consent, and data security will be guaranteed by encryption and other technical measures before transmission or storage. In addition, we will take measures to ensure compliance with this Policy and applicable local legal requirements, such as necessary data export security assessment, data protection capability review of the data receiver, signing of data protection agreements or data transfer agreements, etc.**

#### **H. Protection of children's personal information**

- 1. This website is primarily intended for adults. Children (minors under the age of 14) are not allowed to create their own user accounts or use this website without the consent of their guardians.**
- 2. For the collection of children's personal information with the guardian's consent, we will only process the children's personal information when the law permits, after obtaining the guardian's explicit consent or under necessary cases for protecting the children.**
- 3. If we find that we have collected personal information from children without prior verifiable parental consent, we will try to delete the data as soon as possible.**





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## **I. Scope of application of the privacy policy**

The Policy only applies to this website and does not apply to the following situations:

1. The information collected by any third-party Product (or Service), into which this website is embedded.
2. Information collected by third-party services, advertisements or other companies, organizations or individuals accessed to this website.

## **J. Changes and amendments to the privacy policy**

Our privacy policy is subject to modifications. Without your explicit consent, we will not limit your rights under the Policy.

We may update the Privacy Policy from time to time by issuing any revisions on this website. **If any material changes occur, we may post a prominent notice on the website and, where required by law, notify you directly.**

Material changes referred to in the Policy include but are not limited to:

1. Significant changes have taken place in our website mode. Such as the purpose of processing users' personal information, the type of users' personal information processing, the usage of users' personal information, etc.;
2. Major changes occur in our rights of control, etc. Such as merger and reorganization incurred by the owner change, etc.;
3. The main objects for share, transfer, or public disclosure of users' personal information have changed;
4. When your rights to participate in the processing of users' personal information and the exercise way have changed significantly;
5. When there are changes in our department responsible for handling users' personal information security, contact information and channels for complaint;
6. When high risk exists in the users' personal information security impact assessment report.

## **K. How to contact us**

If you have any questions, comments, suggestions or complaints about our privacy policy and the



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handling of users' personal information, please contact us in the following ways:

User service hotline: 95015

E-mail: [kefu@qianxin.com](mailto:kefu@qianxin.com)

