

SUNRATE Privacy Policy EN v2.8

Your use of the SUNRATE Services and our collection, use, retention, disclosure and protection of the personal information you provide to us will be subject to the following Privacy Policy, which you are requested to familiarize yourself with and understand. We may update it from time to time and you agree that we may not otherwise notify you. Your continued use of the SUNRATE Services will be governed by the updated Privacy Policy. Therefore, we recommend that you check our website frequently.

1. Type of Information We Collect

- 1.1 Information which you provide by filling in both our website forms and any type of written forms, which includes information provided by you while you register and request to use our website, subscribe to and use our service, as well as any further information we may request when we process your service application, when we deliver services to you, and when you report a problem back to us.
- 1.2 Details of transactions executed through our website or other methods and services that we process for you, which may include payment amounts, details of beneficiaries of whom you are making payments to, information regarding incoming Funds and other transaction-related information. We will retain such information for each of your transactions using our service and may add it to your account profile for use in relation to your future transactions through our service.
- 1.3 The IP address of your computer and other information about the device you use to access our service, from which information you may be identifiable. We retain this information to detect unauthorized transactions.
- 1.4 Details of your visits to our website, including but not limited to, traffic data, location data, weblogs and other communication data. We collect these data for the purpose of providing you with our services or otherwise and providing the resources that you visit.
- 1.5 Information about yourself. This may include your name, biometric information, address, phone number, email address, our potential and existing Customer's business name, registration number, business address, copies of ID of directors, directors' names, directors' dates of birth, employment details and information relating to your financial circumstances. In order to enable us to provide our services to you, you

must provide your designated bank account information, "Know Your Customer" information, password information, and responses to security questions. In addition to the "Know Your Customer" information you provide when you apply for a SUNRATE account, we may ask you for further identification information in the course of providing services to you, in particular, when you make or receive high value payments, or to comply with our anti-money laundering regulations.

- 1.6 When you contact us, we may keep a record of that correspondence. We may also require you to complete surveys which we use for research purposes, although you do not have to respond to them.

2. How Do We Collect Information

- 2.1 We collect information about you when you access our website, register an account (online or through paper based forms) or when you communicate with us over the phone or in writing.
- 2.2 When you access our websites, we may collect your information such as IP address and cookies, please refer to Provision 8 regarding IP address and cookies.
- 2.3 When you register an account with us, we collect, process and store information including but not limited to the information mentioned in Provision 1.5. Once your SUNRATE Account is fully set up and you begin to transact with us, we will collect, process and store financial and transactional information including but not limited to the information mentioned in Provisions 1.2 and 1.5.

3. Purpose to Collect Information

- 3.1 One of the main reasons we collect and use your personal and business information is to allow us to process your account and service application, as well as transactions you may book through us and to maintain the accuracy of information on your account. Once you have a SUNRATE Account with us, we will use your details to contact you and to reply to any queries or requests. We may use your information in the administration of your account, which includes updating your account details (this assists us to keep our records as up to date as possible) or in order to notify you of any change or improvement to our products or services which may affect your use.
- 3.2 We use your information in order to supply our products and services to you, meet our contractual obligations to you, safeguard our website, and so on.

Additionally, we may need to notify you of any changes relating to our products and services.

- 3.3 Anti-money laundering is one of SUNRATE's top focuses, which requires us to undertake due diligence on our Customers. This may include use of electronic verification tools. Where electronic verification is not possible, we will require Customer to provide documents including but not limited to, copies of identification documents and proof of address. We may also need to pass your information onto governmental departments, regulatory authorities, the police/law enforcement agencies or to a court of law. This would be done, for example, to assist in the prevention of a crime (money laundering/fraud), to meet legal requirements or for other lawful purposes.
- 3.4 We may use your information to keep you updated of information concerning our products and services. Customer surveys help us to improve our services. We may send you emails inviting you to participate in surveys or requesting for feedback on our services. The information may be shared with affiliated third parties in aggregate form only. We may also use the information you provide to us when you interact on our website or sign up for our services. We may share this information with any members within our group, and third parties. Please contact us if you do not wish to receive such advertisements.
- 3.5 We may record all our telephone calls for security and training purposes.

4. Sharing of Information

- 4.1 We may disclose your personal information to any member within our group.
- 4.2 Under the following certain events, we may disclose your personal information to third parties: a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; b) If SUNRATE or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 4.3 We may share your information with regulators, banks, e-commerce platforms (such as Amazon), other third party payment processors and any third party based on your authorization, and service provider(s) safeguarding our website:
 - 4.3.1 We may need to share your information with regulators or other law enforcement agencies. We may need to disclose or share your personal data in order to comply with our legal obligations, or to enforce or apply the Agreement or other agreements, and to protect the rights, property,

or safety of SUNRATE, our Customers, or others. This includes exchanging information with other companies or organizations for the purposes of fraud detection and credit risk reduction.

4.3.2 We may need to share your information collected under Provision 1 with e-commerce platforms such as Amazon as requested, in order to enable you to use the collection accounts provided by us and to receive Funds from such platforms.

4.3.3 We may need to share your information with third parties in order to process your transactions, including but not limited to, bank counterparties and third party payment processors.

4.3.4 Owing to the nature of our business, we may need to share your information with individuals or organizations outside your country of residency, such as intermediary or beneficiary banks. We are required to add certain information to the payment, which may include your name and address.

4.3.5 Additionally, we may provide your information to a third party based on your authorization and instruction, and may share necessary information to service provider(s) safeguarding our website.

4.4 We may also use your information, or allow third parties selected by us to use your information, to provide you with information about products and services which may be of interest to you, and we or they may contact you by post or telephone. Contact us if you do not wish us to use your information this way, or to pass your details on to third parties for marketing purposes.

5. Storage of Information

5.1 We apply physical, electronic and procedural controls to protect your information. We store all information in electronic forms. Depending on the type of service you use, your information is stored on servers located in mainland China or Hong Kong, and is protected by actively maintained firewalls. We employ the most up-to-date anti-virus software and set restricted physical access to the servers. If you provide paper-based documentation, we may retain these paper documents in addition to their e-copies.

5.2 Transmission of data on the internet can never be guaranteed as completely secure. We do not and cannot guarantee security of information collected or transmitted electronically. However, we would make reasonable endeavors to protect your personal information.

- 5.3 All necessary information, including but not limited to, regulatory related information (e.g. information related to anti-money laundering and counter-terrorist financing), will be stored no less than 10 years according to regulatory legislation.

6. Access of Your Information

- 6.1 You may request in writing for details of personal information we hold about you, a description of that information, the purposes for which it is being used and all shared parties. However, we have sole discretion to reject such request with no liability nor obligation.
- 6.2 If we provide such information, we may charge you a certain amount of administration fee.

7. Change to Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on our website (www.sunrate.com), and where appropriate, notified to you by e-mail.

8. IP Address and Cookies

- 8.1 We may collect information about your computer, including but is not limited to available IP address, operating system and browser type, for purposes of system administration and reporting aggregate information to our advertisers. Such information is statistical data about the browsing actions and patterns of our Customers and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a Cookie file stored on the hard drive of your computer, or similar technologies for information storage or retrieval, such as local shared objects, web beacons or web bugs.
- 8.2 A Cookie is a small file of letters and numbers downloaded onto a device when a user accesses certain websites. A Cookie will allow a website to identify a user's device. A Cookie will contain the name of internet location of the source of that Cookie and its lifetime.
- 8.3 We use session Cookies to allow you to carry information across pages of our website to avoid re-entry of information. Such Cookies are temporary Cookies which would be stored in the cookie file of your browser only during your stay on that website.

- 8.4 We also use persistent Cookies from time to time to help us recognize you as a unique user when you return to our website, and to monitor your use of our website; should you come to our website through a paid advertisement or a banner on a website of an Affiliate, it also enables us to link you to all of our group members and Service Providers. Persistent Cookies may remain in the Cookie file of your browser for a much longer period, depending on the lifetime of that specific cookie in question.
- 8.5 Some of our web pages may contain web beacons which allow us to count users who have visited these pages. Web beacons only collect limited information, including a Cookie number, time and date of a page view, and a description of the page where the web beacon resides. These beacons do not carry any personally identifiable information and are used to track the effectiveness of a particular marketing campaign.

9. Data Protection Officer

We have appointed a data protection officer ("DPO") who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions regarding this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Data Protection Officer, SUNRATE

Email address: dpo@sunrate.com

Revised on 19 September 2024
Effective on 23 September 2024

SUNRATE 隐私政策 CN V2.8

在您使用 SUNRATE 服务，以及我们在收集、使用、保留、披露和保护您提供给我们个人信息时都将须遵守如下隐私政策，请您熟悉和了解。我们将不时对其更新，您同意我们可不以其他方式另行通知您。在隐私政策更新后，您继续使用 SUNRATE 服务的行为将受更新后的隐私政策的约束。因此，我们建议您经常登录我们官网查看。

1. 我们收集的信息类型

- 1.1 您在填写我们的网站表格以及任何类型的书面表格时提供的信息。包括您在注册及请求使用我们的网站、订阅及使用我们的服务时提供的信息，以及在我们处理您的服务申请、我们向您提供服务、以及您向我们报告问题时我们可能要求您提供的进一步信息。
- 1.2 有关通过我们网站或其他方式执行的交易详细信息以及我们为您处理的服务详细信息。可能包括付款金额、收款人详细信息、汇入资金及其他交易相关信息。每次您使用我们的服务进行交易时，我们会保留该等信息，并可能将其添加至您的账户资料以供未来您使用我们服务进行交易时使用。
- 1.3 您计算机的 IP 地址以及您访问我们的服务所用设备的其他信息。这些信息可能可以识别出您的身份。我们保留该等信息旨在检测未授权的交易。
- 1.4 有关您访问我们网站的详细信息，包括但不限于流量数据、位置数据、网络日志以及其他通信数据。我们收集这些数据旨在向您提供我们的服务或出于其他目的，以及向您提供您所访问的资源。

- 1.5 关于您自身的信息。该等信息可能包括您的姓名、生物识别信息、地址、电话号码、电子邮件地址、我们潜在和现有客户的企业名称、注册号码、办公地址、董事身份文件副本、董事姓名、董事出生日期、就业详情以及有关您财务状况的信息。为了使们能够向您提供我们的服务，您必须提供银行账户信息、客户尽职调查信息、密码信息以及安全问题的答案。除了在您申请开立 SUNRATE 账户时提供的客户尽职调查信息外，在向您提供服务期间，我们可能会要求您提供进一步的身份识别信息，尤其当您支付或接收高额款项而我们出于遵守反洗钱法规需要时。
- 1.6 当您联系我们时，我们可能保留该通信记录。我们还可能要求您完成我们用于研究的调查问卷，您可以选择不回应该等调查。

2. 我们如何收集信息

- 2.1 当您访问我们网站、注册账户（在线注册或通过纸质表格注册）或通过电话或书面形式与我们沟通时，我们会收集有关您的信息。
- 2.2 当您访问我们的网站时，我们可能收集诸如您的 IP 地址与 Cookies 在内的信息。请参见条款 8 关于 IP 地址及 Cookies 的说明。
- 2.3 当您在我们注册账户时，我们会收集、处理和存储包括但不限于条款 1.5 所述内容在内的信息。一旦您的 SUNRATE 账户开立完成并且您开始与我们进行交易，我们还会收集、处理和存储财务和交易信息，包括但不限于条款 1.2 及 1.5 所述信息。

3. 我们收集信息的目的

- 3.1 我们收集和使用您的个人及商业信息的主要原因之一是让我们可以处理您的账户申请、服务申请、您通过我们发起的交易，以及维持您账户信息的准确性。一旦您在我

们开立 SUNRATE 账户，我们将使用您的详细信息与您进行联络、回复您的询问或请求。我们可能在管理您的账户时使用您的信息，包括为了更新您的账户详细信息（这有助于我们最大程度保持记录的时效性）或告知您可能影响到您使用的产品或服务的任何变更或改进。

3.2 我们使用您的信息是为了向您提供我们的产品及服务、履行我们对您的约定义务、更好地保护我们网站的安全等。此外，我们可能需要通知您有关我们产品及服务的任何变更。

3.3 反洗钱是 SUNRATE 的主要焦点之一。该项工作要求我们对我们的客户进行尽职调查。这其中可能涵盖电子验证工具的使用。当电子验证不可用时，我们会要求客户提供包括但不限于身份文件副本及地址证明在内的文件。我们可能还需要将您的信息提供给政府部门、监管机构、警察/执法机构或法庭。这样做是为了比如预防犯罪（洗钱/欺诈）、满足法律要求或出于其他合法目的。

3.4 我们可能使用您的信息以告知您有关我们产品及服务的最新信息。客户调查有助于我们提升我们的服务。我们可能向您发送电子邮件邀请您参与调查或征求有关我们产品的反馈。该等信息可能与第三方关联公司共享，但只会以整体信息提供。我们还可能使用您在我们网站互动或注册我们的服务时提供的信息。我们可能与 SUNRATE 集团的任何成员及有合作的第三方共享该等信息。如果您不希望收到这类广告信息，请联系我们。

3.5 我们可能出于安全及培训目的保留所有我们的电话记录。

4. 信息的共享

4.1 我们可能将您的个人信息披露给 SUNRATE 集团的任何成员。

- 4.2 在下列特定情况下，我们可能将您的个人信息披露给第三方：a) 当我们出售或收购任何业务或资产时，我们可能将您的个人信息披露给该等业务或资产的潜在卖方或买方；b) 如果 SUNRATE 或其实质上绝大部分资产被第三方收购，其持有的有关其客户的个人数据也将属于被转让资产之一。
- 4.3 我们可能将您的信息共享给监管机构、银行、Amazon 等电子商务平台、其他第三方支付处理机构或其他您授权我们向其提供的第三方，以及保护我们网站安全的服务商：
- 4.3.1 我们可能需要将您的信息共享给监管机构或其他执法机构。此外，我们可能需要披露或共享您的个人信息以履行我们的法律义务、或执行或应用本协议或其他协议、以及保护 SUNRATE、SUNRATE 的客户或其他人的权利、财产及安全。这包括出于进行欺诈监测及降低信用风险的目的，而与其他公司或组织交换信息。
- 4.3.2 我们可能需要应 Amazon 等电子商务平台的要求向其提供条款 1 下您的信息，以便您能够使用我们提供的收款账号并从这些电子商务平台接收资金。
- 4.3.3 为了处理您的交易，我们可能需要将您的信息共享给第三方，包括但不限于银行交易对手及第三方支付处理机构。
- 4.3.4 根据我们的业务性质，我们可能需要将您的信息共享给您居住国之外的个人或组织，例如中间行或收款行。我们需要在付款信息中加入特定信息，该等信息可能包括您的姓名及地址。
- 4.3.5 此外，我们还可能根据您的授权向您指示的第三方提供您的信息，以及将必要的信息共享给保护我们网站安全的服务商。
- 4.4 我们还可能使用您的信息，或允许我们选择的第三方使用您的信息、向您提供您可能感兴趣的产品或服务，并且我们或他们可能通过邮寄或电话方式与您联系。如果您不

希望我们以此种方式使用您的信息，或不希望我们出于营销目的将您的详细信息提供给第三方，请联系我们。

5. 信息的存储

5.1 我们使用物理、电子及程序管控来保护您的信息。我们将所有信息以电子形式存储。

根据您使用的服务的类型，您的信息存放于架设在中国大陆或香港的服务器内，并由积极维护的防火墙提供保护。我们使用最新的防病毒软件，并为服务器设置了物理访问限制。如果您提供了纸质文档，我们可能在保存该等文档的电子版本之外保留其纸质版本。

5.2 通过互联网进行的数据传输无法保证其绝对安全。我们不会也无法为以电子方式收集或传输的信息提供安全担保，然而，我们会采取合理努力保护您的个人信息。

5.3 所有必要信息，包括但不限于监管相关信息（如反洗钱及反恐怖主义融资相关的信息），将根据监管法规要求存储不少于 10 年。

6. 对您信息的访问

6.1 您可以通过书面方式请求我们提供有关我们所持有的有关您的个人信息详情、该等信息的描述、其目前用途以及所有被共享的对象，然而我们可以自主决定拒绝该等请求而无需承担任何责任或义务。

6.2 如果我们提供该等信息，我们可能向您收取一笔管理费用。

7. 隐私政策的修改

我们未来可能对隐私政策做出的任何修改，将在我们的网站 (www.sunrate.com)

发布，并在合适情况下通过电子邮件通知您。

8. IP 地址及 Cookies

8.1 我们可能收集有关您计算机的信息，包括但不限于可用 IP 地址、操作系统及浏览器类

型，以进行系统管理及将整体信息报告给我们的广告商。该等信息为我们客户浏览活

动及浏览模式的统计数据，并不识别任何个人。出于同样原因，我们可能通过一个存

储在您计算机硬盘上的 Cookie 文件，或用于信息存储和取回的类似技术（例如本地

共享对象、网络信标，或网络臭虫）来获取有关您一般互联网使用的信息。

8.2 Cookie 是用户访问特定网站时下载到其设备上的一个包含字母和数字的小文件。

Cookie 可以让网站识别用户的设备。Cookie 会包含该 Cookie 来源的网络位置名称

及 Cookie 的期限。

8.3 我们使用会话 Cookie 以让您可以在我们网站页面之间携带信息，从而避免信息再次

输入。此种 Cookie 属于临时 Cookie，仅会在您停留该网站期间被保存在您浏览器

的 Cookie 文件里。

8.4 我们不时还会使用持久性 Cookie，以帮助我们在您返回我们的网站时将您识别为一

独特的用户，以及监控您对我们网站的使用；如果您通过付费广告或一家关联公司网

站上的横幅来到我们的网站，它还让我们可以将您链接到所有我们的关联公司以及服

务提供商。持久性 Cookie 可能在您浏览器 Cookie 中存在更长一段时间，取决于该

具体 Cookie 的存在期限。

8.5 我们的部分网页可能含有网络信标，它使得我们可以统计访问这些页面的用户的数量。网络信标只会收集有限信息，包括 Cookie 号码、网页浏览时间与日期、信标所在网页的描述。这些信标不携带任何可以识别个人的信息，信标的用途是用于追踪某一具体营销活动的有效性。

9. 数据保护官

我们已任命一名数据保护官("DPO")负责监督与本隐私政策有关的问题。如果您对本隐私政策有任何疑问，包括任何行使您合法权利的请求，请使用以下详细信息与 DPO 联系。

数据保护官, SUNRATE

邮箱: dpo@sunrate.com

修订日期: 2024 年 9 月 19 日

生效日期: 2024 年 9 月 23 日