

APP Privacy Policy

The copyright of the Privacy Policy (hereinafter referred to as “this policy”) is reserved by Shenzhen Deep Sea Innovation Technology Co., Ltd. (hereinafter referred to as “the Company” or “we”) and will help you understand the following major policies:

1. We will collect part of your information required to ensure the normal operation of the core and other functions of our products;
2. We will NEVER share, provide or transfer your personal information to any third party or obtain your personal information from a third party, unless otherwise approved by you;
3. We will try to protect your personal information with reasonable safety measures. In case of a special circumstance, we will protect your personal sensitive information with our greatest efforts in the industry via the way commonly used by the industry.
4. How to visit, correct or delete your personal information, withdraw consent and authorization and make complaint?

Where you disagree on this Policy but have begun to use our services, we will collect the information required to maintain the basic functions of the Software only, which, however, will lead to our failure to provide the complete products and services for you; nevertheless, we will still protect your information by taking the measures such as deidentification and encryption. When you use our services again, for the sake of performance of contract and services, you will be deemed having accepted and recognized our treatment for your relevant information as per this Policy.

We attach great importance to the protection of users’ personal information and treat the information with the duties of diligence and prudence. We collect, save, use, share, disclose and protect your personal information arising out of your downloading, installing, opening, browsing and using (hereinafter referred to as “using”) of the Software and relevant services, and particularly prepare this Policy to introduce how we process your personal information. Therefore, you are highly suggested to read all provisions of this Policy carefully and entirely, particularly for the contents regarding your information and rights in bold, which are shown below:

- I. How Do We Collect and Use Your Personal Information?
- II. How Do We Store Your Personal Information?
- III. How Do We Safeguard Your Personal Information?
- IV. Your Rights
- V. Use of Minors
- VI. Revision and Notice of Privacy Policy
- VII. Scope of Application
- VIII. Contacts
- IX. Miscellaneous

I. How Do We Collect and Use Your Personal Information?

During your use of the Software and services, we will collect information in the principles of legality, rightness and necessity. The information that we collect or you provide will be used for the purposes below:

1. Ensure the basic normal operation of products;
2. Realize various functions and services;
3. Optimize and improve products and services;
4. Ensure the safety of products and services and user’ s use safety;
5. Comply with provisions of laws and regulations and national standards.

(i) Personal information we collect and use actively

We will collect the information that you provide actively while using our services and the information generated from your using functions or accepting services as per the method below:

1. Ensure the normal operation of the Software and services

When you use the Software and relevant services, we, to ensure the normal operation of the Software and services, will collect information such as model of your hardware, version No. of operating system, address of network hardware equipment (MAC), IP address, software version No., network access mode and type and operation log. We remind you that all the aforesaid information is the basic information that we require to provide services and guarantee the normal operation of products.

2. Provide the following functions or services for you:

- (1) It is required to obtain the permission of writing into/ deleting storage space to save and delete a file function.
- (2) It is required to obtain the permission of reading storage space to read file function.
- (3) For mobile phone adaption, it is required to obtain equipment identification code information permission to provide different functions and experiences according to different equipment and system versions. Obtaining product use condition and Bug information helps us improve product function and experience constantly.
- (4) For camera function, it is required to use camera permission for photographing or screen recording of live camera picture.

3. Ensure the safety of products and services and user’ s use safety

To help us understand how the Software and relevant services run better and ensure the safety of operation and services, we use a third-party statistical tool to record weblog information and the information such as frequency of using software and relevant services, crash data, overall installation, use condition and performance data.

You are required to be fully informed that we have finished the deidentification/ anonymization before we collect and use the above information, and the data analysis is only oriented to the specific numbers not directly related to user’ s identity.

(ii) Changes in the purpose of personal information collection and use

You are required to be fully informed that we may adjust the functions of the Software and the provided services while exploring business further. In principle, when a new function or service is related to the scene described in magnified words or floating window, the collected and used personal information will be directly or reasonably associated with the original treatment purpose. For the scene not directly or reasonably associated with the original purpose, we will inform you again before collecting and using your personal information and obtain your consent.

(III) Legal exemptions from the consent for collecting and using personal information

Please be informed that, according to laws and regulations and/or relevant national standards, we may, without your authorization and consent, collect and use your personal information that is:

- (1) directly related to national safety and national defense;
- (2) directly related to public safety, public health and significant public interests;
- (3) directly related to crime detection, prosecution, trial and execution of judgment;
- (4) for the purpose of maintaining major legitimate rights and interests (e.g. life and property) of personal information subject or other individuals but hard to obtain the party’ s consent.
- (5) your personal information collected from your disclosure to the public;
- (6) your personal information, which is collected from the information disclosed legally and publicly, such as legitimate journalism and government information publicity;
- (7) required for the contract signature and performance according to your requirement;
- (8) other circumstances stipulated by laws and regulations.

Special attention: The information unable to identify your personal identity, either alone or in combination with other information, shall not be judged as your personal information in legal sense. But when the information is able to identify your personal identity, either alone or in combination with other information, or we use any data unable to establish relationship with your any specific personal information together with your personal information, the information, during the combined use, is seen as your personal information and will be treated and protected as per this Policy.

II. How Do We Store Your Personal Information?

(i) Information storage place

According to laws and regulations, we will store your personal information collected and generated in domestic operation in the People’ s Republic of China, and never spread the aforesaid information to any overseas country.

(ii) Storage period

We keep your personal information only during the period necessary for providing the Software and services; upon the expiration of the required period, we will delete or anonymize your personal information, unless otherwise stipulated by laws and regulations.

III. How Do We Safeguard Your Personal Information?

- (i) We attach great importance to the security of your personal information, and will take reasonable safety measures (including technical and management measures) to protect it, so as to avoid its improper use, unauthorized access, public disclosure, use, modification, damage, loss or divulgement.
- (ii) We will protect your personal information by reasonable and feasible means (e.g. encryption and anonymization) that are not lower than those of other peers in the industry and adopt safety protection mechanism to keep your personal information from malicious attack.
- (iii) We will establish special security department, security management system and data security process to safeguard your personal information; adopt strict data use and access systems, to make sure only the authorized person could access your personal information, and audit the security of data and techniques in due time.
- (iv) Despite the above reasonable and effective measures we have taken and our full compliance with the standards specified by relevant laws and regulations, you are fully informed that in Internet industry, the absolute security of information cannot be totally ensured in consideration of technical limitation and various malicious means that may exist, even if we have spared no efforts to strengthen the security measures. You shall know and understand the system and communications network you use to access our services may have a problem due to a factor beyond our control. Therefore, you are highly suggested to take actively measures to safeguard your personal information.
- (v) We will also formulate emergency plan, which will be launched immediately in case of a user information safety incident, so as to avoid heavier influence and consequences. In the event of a user information security incident (divulgement, loss, etc.), we will inform you of the basic condition and the influence that may arise therefrom, disposal measures we have adopted or are going to adopt, suggestions on the independent prevention and risk reduction and remedial measures offered to you timely. We will inform you, via notice, email, letter, SMS, etc., of relevant condition of the incident. If it is hard to inform one by one, we will make announcement in a reasonable and effective manner. Meanwhile, we will escalate the disposal condition of user information security incident as per requirements of relevant regulatory departments.
- (vi) You are further informed that the personal information protection measures provided as per this Policy only apply to the Software and relevant services. Once you quit the Software and relevant services and browse or use other websites, services and content resources, we will have no ability and obligation to protect any of your personal information you submit on the software or website other than the Software and relevant services, no matter whether the aforesaid software and website which you log in or browse are based on the link or guide of the Software.

IV. Your Rights

We do much concern the management for your personal information and will try the best to protect your rights to access, modify (update or correct) and delete your personal information and withdraw authorization and consent, so that you have full capacity to protect your privacy and safety.

You can withdraw your consent or change your authorization for the scope within which we could further collect your personal information or withdraw your authorization by the means such as turning off function and changing application permission in equipment setting. You are informed, however, that our specific business functions and services cannot be finished without your personal information. Upon your withdrawal of your consent or authorization, we will be unable to provide the corresponding functions and services for you and stop protecting your corresponding personal information. But your decision on withdrawing consent or authorization will not affect the previous protection of your personal information on the basis of your authorization.

(ii) Access privacy policy

You can view all contents of this Policy through “setting” – “privacy policy” in client.

(iii) Get informed of operation stop

Shall we stop operation, we will stop collecting your personal information timely, notify you in the form of personal delivery or announcement and delete or anonymize your personal information held.

V. Use of Minors

A minor under the age of 18 shall, prior to the use of the Software and relevant services, read and agree this Policy under the guardianship or guidance of your parents or other guardians.

We protect minors’ personal information according to relevant laws and regulations, and collect, use, share or disclose minors’ personal information only when permitted by laws or with the explicit consent from parents or other guardians or a necessity of protecting minors. In case of discovering that we have collected a minor’ s personal information without consent from his or her verifiable parents, we will delete relevant information as soon as possible.

If you are guardian of a minor, please feel free to contact us by the contact information disclosed in this Policy for any question about personal information of the minor under your guardianship.

VI. Revision and Notice of This Policy

- (i) We will revise this Policy in due time, along with the constant updating and change of the Software and relevant services from time to time, in order to provide more amicable services for you. The revision constitutes one part of this Policy and shall have the equal effect with this Policy. But we will not, without your expressed consent, reduce the rights you enjoy according to the current effective privacy policy.
- (ii) In case of updating this Policy, we will remind you of the updated contents at application client of the Software properly before the updated provision takes effect, so that you could learn the latest version of this Policy. You are seen as having accepted the revised policy, if you do further use our services; we will solicit your consent expressly before collecting personal sensitive information (e.g. audio and video, contact information and geographical location) for the updating.
- (iii) For any substantial change, we will also send a conspicuous notice (the notice includes the specific contents that are changed in this Policy by the means including but not limited to email, SMS, private message or special prompt in browser page).

For the purpose of this Policy, substantial change includes but is not limited to:

1. Substantial change in our service mode (e.g. purpose of treating personal information, type of treating personal information and use mode of personal information);
2. Substantial change in the aspects such as ownership structure and organizational structure (e.g. ownership change resulted from business adjustment and bankruptcy and M&A);
3. Change of main object for personal information sharing, transfer or public disclosure;
4. Substantial change in your rights of participating in personal information treatment and exercising mode;
5. Change in our department in charge of personal information security, contact information and complaint change.

VII. Scope of Application

This Policy applies to all services provided by Shenzhen Deep Sea Innovation Technology Co., Ltd. instead of any third-party products or services that are designed with separate privacy policy and not included in this Policy.

This Policy ceases to apply, in any of the following cases:

1. Other third-party products or services, that may include the products or website and advertising contents displayed to you in personalized recommendation or other products or websites linked in the software services;
2. Any other third party that implements advertising publicity for the software services.

You will be restrained by the third party’ s service clauses and privacy policy (rather than this Policy) if using any third party’ s services (including any personal information you provide for the third party). You are suggested to read the third party’ s clauses carefully to learn the specific provisions. Please keep your personal information properly, and provide your personal information for a third party only where necessary.

The Software and relevant services described in this Policy may vary with the factors such as model of your mobile phone, system version and software application version. The final products and services are subject to the Software and relevant services you use.

VIII. Contacts

1. For any question, opinion or suggestion about this Policy, please feel free to contact us via support@depstech.com.
2. If you believe that we collect and use your personal information in violation of any laws and regulations or the agreement with you, please feel free to contact us via support@depstech.com, and request to delete your relevant personal information. We will confirm the involved problem as soon as possible and make a timely reply and treatment after assigning a special person to verify your user identity.
3. Shall you be dissatisfied with our reply, particularly when the way by which we treat your personal information impairs your legitimate rights and interests, you can file a lawsuit to a people’ s court at our site with jurisdiction.

IX. Miscellaneous

(i) The headings in this Policy are only for convenience and reading and do not affect the meaning or interpretation of any provisions herein.

(ii) Terms and definitions:

1. The Software and relevant services refer to the client applications marked with name of the Software that the Company and its related party own and operate legally.
2. Related party refers to any company or organization and legal representative of the aforesaid company or organization which one party controls or will control or is under control or common control. The “control” refers to the ability of directly or indirectly affecting management of the mentioned company, no matter whether it is realized by ownership, voting shares, contract or other means identified as per laws.
3. Deidentification refers to the process of making personal information subject unable to be identified without extra information by the technical means.
4. Anonymization refers to the process of making personal information subject unable to be identified and treated information unable to be restored by technical means.

(iii) The copyright of this Policy is reserved by Shenzhen Deep Sea Innovation Technology Co., Ltd., which has the right to interpret and modify this Policy to the extent permitted by laws.