

# Privacy Policy

**Effective Date: March 1, 2022**

*Shenzhen Sihailan Information&Technology Co., Ltd (together with its affiliates - "Plexins", "us", "our" or "us") makes every effort to ensure that the personal data we process is used securely and correctly and that our data practices are properly communicated to us customers, users and potential customers.*

*This Privacy Policy describes how we collect, store, use and disclose the following types of personal data:*

## Types of Information We Collect

### Customer-Owned Data:

Data relating to identifiable individuals ("Personal Data") that we collect, process and manage on behalf of our customers as part of the Plexins e-commerce marketing platform ("Platform"). Such data ("Customer Data") pertains to individuals who register as end users, make purchases in, or otherwise interact with, our customers' online stores and their interactions with our Services;

### Plexins User Data:

Contact details, contractual and billing details relating to our clients, which may also include details of internal contacts who directly engage with Plexins in relation to their organisational accounts, as well as platform users representing such clients details, such as account administrators and users, billing contacts and authorized signatories on behalf of customers; and customers' needs and preferences, as identified by us or through our engagement with them ( "Users "and "Users" respectively User data");

### Plexins website, CRM and lead data:

with our customers, visitors to our website <https://www.plexins.com>, attendees of our events and visits or otherwise with any other lead or Any other potential customer or partner-related data that the partner interacts with our website, online advertising and content, emails or newsletters (the "Site" and Platform collectively, the "Services" ) under our control.

If you are our customer, user, website user, visitor or potential customer ( "you" ), please read this Privacy Policy carefully and ensure that you fully understand and agree.

You are not required by law to provide us with any personal data, and you may do so voluntarily (or avoid doing so). If you do not wish to provide us with your personal data, or to be processed by us or any of our service providers (as defined below), please refrain from any interaction with us, including visiting our website or using our services. If you are a service user on behalf of any of our clients, we recommend that you contact your account administrator for any questions. If you use the Plexins Services, you agree to the practices described in this Privacy Statement.

## Data collection and processing

### Customer Data:

Our Services provide our customers with a wide range of tools and capabilities to better manage and optimize their end-user experience and interactions with our customers' online properties.

Certain privacy and data protection laws require that before personal data is processed, a legal basis for such processing be established. Therefore, while Plexins supports these laws by providing our customers with features and options on how they use our services, our customers are solely responsible for determining whether and how they use our services and such features, and for ensuring appropriate laws Basis that the customer has established information for processing customer data prior to obtaining such data through the service.

Plexins strictly represents our clients, processing client data and the personal data contained therein in accordance with their reasonable instructions and as further provided in our user agreement and other commercial agreement with that client.

Therefore, to the extent applicable by law, our customers will be considered "data controllers" (for example, under EU GDPR, UK GDPR and similar laws) or "businesses" (under CCPA or similar laws) of customer data; in When processing such data, Plexins will be considered a "data processor" or "service provider".

### Plexins user data:

The user data we collect and generate includes some or all of the following types of personal data:

- User account information - (email address, phone, first name, last name);
- Personal data and contact information – (name, title, team, company, email and phone numbers, and other information submitted by customers or users);
- Platform usage information – (connection, technical and aggregated usage data such as user agent, IP address, device data (e.g. type, operating system, device ID, browser version, locale and language used), activity logs, session records and cookies installed or used on their devices);
- Direct interactions and communications with us - (including recordings and recordings of your phone calls and emails with us, eg for user enablement, support and training purposes).

### Plexins Website, CRM and Prospect Data:

We collect and generate the following types of personal data about our website visitors, customers and prospects:

- Website usage information – (connection, technical and aggregated usage data such as user agent, IP address, device data (e.g. type, operating system, device ID, browser version, locale and language used), activity logs, Session records and cookies and pixels installed or used on their devices);
- Information about our clients and prospects - (contact and business details, our communications with such clients and prospects, and any needs, preferences, attributes and insights related to our potential engagement);
- Direct interactions and communications with us – (including recordings and recordings of your phone calls, emails, form submissions and chats with us, eg for customer support, feedback, etc.).

We collect this data automatically through data subjects' interactions with us or with our website or services; or through third-party services, social media, analytics tools, events we organize or participate in, and other business initiatives.

## **Purpose of data collection**

We process your personal information in order to operate, provide and improve the services we provide to our customers.

These purposes include:

**Provide, troubleshoot and improve rebate services.** In addition to fixing bugs, we may process personal information by analyzing and monitoring usage and trends, and performing statistical analysis to improve our services and websites, applications, marketing efforts, and the products and services of our affiliates, in order to provide You provide better service in the future;

**Personalize the user experience.**

We may use aggregated information to understand how our users as a group use the services and resources available on our website;

**Send regular emails or reminders.**

send personal information about topics that we believe will be of interest to you that you have agreed to receive;

**Launch promotions, contests, surveys, events or other website features.**

We may use email addresses to send users information and updates related to their orders. It can also be used to respond to their inquiries, questions and/or other requests. If you decide to join our mailing list, they will receive emails that may contain company news, updates, related product or service information, and more. If you wish to unsubscribe from receiving future emails at any time, we will provide detailed unsubscribe instructions at the bottom of each email;

**communicate with you.**

We use your personal information to communicate with you about the Services through various channels (eg, by phone, email, chat);

**Comply with legal obligations.**

In some cases, we collect and use your personal information to comply with the law;

**advertise.**

We use your personal information to show you interest-based advertising about services, upcoming promotions and other information that may be of interest to you, using the contact details you provide to us and always in compliance with applicable laws. You may unsubscribe from our newsletter list at any time by following the unsubscribe instructions included in every email we send;

**Fraud Prevention and Credit Risk.**

We process personal information to prevent and detect fraud and abuse to protect the safety of our customers. We may also use scoring methods to assess and manage credit risk;

**The purpose for which we seek your consent.**

We may also seek your consent to process your personal information for the specific purposes for which we communicate with you. When you consent to our processing of your personal information for a specific purpose, you can withdraw your consent at any time and we will stop processing your data for that purpose;

**To facilitate and optimize our marketing campaigns, advertising management and sales operations, and to more effectively manage and serve advertisements of our products and services, including on other websites and applications.**

Such activities allow us to highlight the benefits of using our services, thereby increasing your engagement and overall satisfaction with our services. This includes contextual, behavioral and interest-based advertising based on your activities, preferences or other data available to us or our business partners.

Plexins strictly represents our clients, processing client data and the personal data contained therein in accordance with their reasonable instructions and as further provided in our user agreement and other commercial agreement with that client.

If you reside or use the Services in a region governed by privacy laws, "consent" is the sole or most appropriate legal basis for the processing of personal data described herein (in general, or in particular with respect to personal data, according to that region). type) that you expect or choose to process on or through the Services, such as "special categories" under the GDPR), your acceptance of this Privacy Policy will be deemed your consent to the processing of your Personal Data for the purposes detailed in this Policy all purposes stated. If you wish to withdraw such consent, please contact us at [info@plexins.com](mailto:info@plexins.com).

**We do not sell your personal information for the intent and purposes of the California Consumer Privacy Act (CCPA).**

## **Data retention**

We strictly retain customer data on behalf of our customers. In accordance with their reasonable instructions and as further provided in our other commercial agreement with that customer.

We retain Plexins user data and Plexins website, CRM and lead generation data for as long as is reasonably necessary to maintain and expand our relationship and provide you with our services and products; to comply with our legal and contractual obligations; or to protect Indemnify yourself from any potential disputes (i.e. as required by the laws applicable to log keeping, record keeping and bookkeeping, and in order to obtain evidence and evidence of our relationship in the event of any legal issues arising after your cessation of use), all in accordance with Our data retention policy.

Please note that we are not obligated to retain your personal data for any particular period of time unless required by applicable law or a specific agreement we have with you, and we may securely delete or restrict access to it at any time for any reason, regardless of the length of time whether to notify you. If you have any questions about our data retention policy, please contact us at [info@plexins.com](mailto:info@plexins.com).

## Data Sharing

### Legal Compliance:

In exceptional circumstances, we may disclose or allow government and law enforcement officials to access your personal data in response to a subpoena, search warrant or court order (or similar request), or to comply with applicable laws and regulations. Disclosure is appropriate if we have a good faith belief that:

- 1. We are legally compelled to do so;*
- 2. Disclosure is appropriate in the context of the investigation, prevention or action of actual or suspected illegal activity, fraud or other wrongdoing;*
- 3. Such disclosure is necessary to protect our legitimate business interests, including the security or integrity of our products and services;*

### Service Providers:

We may engage selected third-party companies and individuals to provide services that complement our own services.

Such service providers include hosting and server hosting services, communications and content delivery networks (CDNs), data and network security services, billing and payment processing services, fraud detection and prevention services, web and mobile analytics, data enrichment, email and/or SMS distribution and monitoring services, call, session or activity recording and analysis services, remote access services, performance measurement, data optimization and marketing services, social and advertising networks, content providers, email, voicemail, support and customers Relationship management systems, and our legal, financial and compliance advisors (collectively, "Service Providers").

These service providers may have access to your personal data, depending on each of their specific roles and purposes in facilitating and enhancing our services, and may only use it for the limited purposes identified in our agreement with them ;

### Partnerships:

We engage selected business and channel partners, resellers, distributors and providers of professional services in connection with our services, which enables us to provide our potential and current There are customer and user-tailored experiences to explore and pursue growth opportunities. In such cases, we may share relevant contact, business and usage details with the appropriate partners to allow them to interact with these customers and users for this purpose. If you interact directly with any of our partners, please be aware that any aspect of that interaction not directly related to the service and directed by Plexins is beyond the scope of Plexins' terms and privacy policy and may therefore be governed by the partner's terms and Privacy Policy;

### Customers and other users:

Customer data is often shared and available to users belonging to such customer accounts. Plexins user data is shared with the administrator of the customer account to which the user belongs (including data and communications about the user account).

In this context, sharing such data means that administrators or other users of the same account can access this data on behalf of the client and be able to monitor, process and analyze the personal data contained therein. This includes situations where you can contact us for assistance with a specific issue on the team you are a part of (and managed by the same client).

Please note that Plexins is not responsible for and does not control any further disclosure, use or monitoring by or on behalf of clients and itself acts as a "data controller" of such data;

### Protection of rights and safety:

We may share personal data with others if we have a good faith belief that this will help protect the rights, property or personal safety of Plexins, any of our users or customers, or any member of the public;`

### Plexins Subsidiaries and Affiliates:

We may share personal data within the Group for the purposes described in this Privacy Policy. In addition, personal data may be shared or transferred with related parties in this case. If we believe that such a change of control may have a material impact on the personal data you subsequently store with us, we will notify you of this event and the choices you may have by email or a prominent notice on our Services.

For the avoidance of doubt, Plexins may otherwise share Plexins user data, website, CRM and lead data, provided you expressly approve it, or if we are legally obligated to do so, or if we have successfully presented such data as Non-personal data, non-identifiable and anonymous.

## Cookies and Tracking Technologies

We and our service providers use cookies and other technologies for performance, tracking, analytics and personalization purposes. We may share non-identifiable/aggregated extracts of such information with our partners for our legitimate business purposes.

A cookie is a packet of information sent to your web browser and then sent back each time the browser visits the server that sent the cookie. Some cookies are deleted when you close your browser session. These are "session cookies". Some last longer and are called "persistent cookies". We use both types.

We use persistent cookies to remember your login details and to make it easier for you to log in the next time you visit the Platform. We may use such cookies and session cookies for other purposes to facilitate the use of features and tools of the Services.

While we do not change our practices in response to "Do Not Track" signals in HTTP headers from browsers or mobile applications, you can do so through your browser settings. Please keep in mind that disabling cookies may complicate or even make your use of the Services unusable. You can also use the "Cookie Settings" feature available on our Services based on your location and activities (if applicable) on our Services.

Please note that if you acquire a new computer, install a new browser, delete or otherwise change your browser's cookie file (including upgrading some browsers), you may also clear installed opt-out cookies after opting out, so additional Selecting -out will be necessary to prevent additional tracing.

## Communication

We conduct service and promotional communications via email, phone calls, text messages and notifications.

### Service Communications:

We may share personal data within the Group for the purposes described in this Privacy Policy. In addition, personal data may be shared or transferred with related parties in this case. If we believe that such a change of control may have a material impact on the personal data you subsequently store with us, we will notify you of this event and the choices you may have by email or a prominent notice on our Services.

### Promotional Communications:

We may also notify you about new features, additional products, events, special opportunities or any other promotional information we think you will find valuable to our customers, users or potential customers. We may provide such notices through any contact method available to us (such as telephone, mobile or email), through the Services or through our marketing activities on any other website or platform.

You can generally control your communication and notification settings from your Plexins user profile settings, or by following the instructions contained in communications sent to you.

Please note that you will not be able to opt out of certain service communications (such as password resets or billing notifications) related to your use. If you do not wish to receive promotional communications, you may notify us at any time by emailing: [info@plexins.com](mailto:info@plexins.com), by changing your communications preferences in your user profile settings, or by following the included "unsubscribe" , "Stop," "Opt Out," or "Change Email Preferences" as described in the promotional communications you receive.

## Data Security

We and our Managed Services implement systems, applications and procedures to protect your personal data to minimize the risk of theft, damage, loss or unauthorized access or use of information. These measures provide complete industry standard security. However, while we strive to protect your privacy, we cannot guarantee that our services will be free from any misconduct, malfunction, unlawful interception or access, or other types of abuse and misuse.

## Data subject rights

Individuals have rights over their personal data. If you wish to exercise your privacy rights under applicable law (including the GDPR, UK GDPR or CCPA), such as the right to request access, rectification or deletion of your personal data held with Plexins, or to restrict or object to the processing of such data, or the transfer of such personal data, or the right to equal services and prices (each to the extent available to you under the law applicable to you) - please contact us by email: [info@plexins.com](mailto:info@plexins.com)

We may delete any personal data relating to others from the data we will provide to you.

If you wish to make any requests or inquiries regarding the personal data we process on behalf of clients, please contact the clients or the administrators of such client accounts directly as they will be the "data controllers" of such data.

Please note that if you contact us in this regard, we may share your communications with the relevant customer and its account users; and we may also share account management with individuals who send us such requests or inquiries related to this account member's contact information.

## Data Controller/Processor

Certain data protection laws and regulations, such as the EU GDPR, UK GDPR or CCPA, generally distinguish between two main roles for parties processing personal data: the "data controller" (or under CCPA, the "business"), who decides the processing the purpose and means; and a "data processor" (or under the CCPA, a "service provider") that processes the data on behalf of the data controller (or business). Below we explain how these roles apply to our Services, to the extent these laws and regulations apply.

Plexins is the "data controller" of the Plexins website, CRM. For such data, we assume the responsibility of the data controller (only to the extent applicable by law), as described in this Privacy Policy. In this case, our service provider processing such data will assume the role of "data processor".

Plexins is a "data processor" of customer data and we process this data on behalf of our customers (who is the "data controller" of such data; service providers who process such customer data on our behalf are "sub-processors" of such data).

Plexins is both a "Data Controller" and a "Data Processor" of Plexins User Data. Plexins processes such data as an independent "controller" for its own purposes; some parts contained in customer data will be processed by us as a "processor" on behalf of our customers.

For the avoidance of doubt, each customer is solely responsible for establishing a legal basis to proceed and provide adequate notice to its account users and customers whose data may be included in customer data - including adequate reference to the processing of their personal data through the Services, and compliance with all any other information required by applicable privacy and data protection laws; and obtain all approvals and consents from such individuals as required by such laws.

## **Additional Notices**

### **Updates and Revisions:**

We may update and revise this Privacy Policy from time to time by posting revised versions on our Services. The revised version is effective from the date of publication. We will give advance notice if we believe there are any material changes involved through any means of communication available to us or through the Services. After this notice period, all modifications shall be deemed accepted by you.

### **External Links:**

While our Services may contain links to other websites or services, we are not responsible for their privacy practices. We encourage you to keep an eye on such third-party websites or applications when leaving our Services and to read the privacy policy of each website and service you visit. This Privacy Policy applies only to our Services.

### **Our services are not designed to attract children under the age of 16:**

we do not knowingly collect personal data from children and do not wish to do so. If we become aware that a person under the age of 16 is using the Services, we will attempt to prohibit and prevent such use and will use our best efforts to promptly delete any personal data we store in relation to that child. If you believe we may have any such data, please contact us at [info@plexins.com](mailto:info@plexins.com).

## **Contact information**

Questions, concerns or complaints: If you have any comments or questions about our Privacy Policy, or if you have any concerns about your personal data we hold, please contact us at [info@plexins.com](mailto:info@plexins.com).