

# Privacy Policy

This privacy policy applies to all users of PhoneTaxi OP (“PhoneTaxi OP”). PhoneTaxi OP is developed by Aitrigo Limited whose address is at Unit B&C, 20/F., Fullwin Commercial Centre, 573 Nathan Road, Kowloon, Hong Kong. PhoneTaxi OP is operated by Fengdi Limited whose operating address is at Shop G, G/F 171-175 Pratas Street, Sham Shui Po, Kowloon, Hong Kong. This privacy policy explains how we collect, use, share, and protect your personal information. If we decide to change our privacy policy, we will post those changes to our mobile app and website. We reserve the right to update or change our privacy policy at any time. Please read this privacy policy carefully. By using our Products and/or Services, you are agreeing that you are at least eighteen (18) years of age and that you have fully understood and accepted all the terms and content of this privacy policy. If you do not agree with this privacy policy, you may not use our Products and/or Services.

## 1. How We Collect Information

Personal information is collected in the following ways:

- 1.1 Information you provide us directly, including information given from account registration or by phone, information submitted in an application form or agreement for our products and/or service, and information submitted through the mobile app or website;
- 1.2 When you voluntarily provide to us when using our mobile app, visiting our official website or participating in our online services, for example, registration in our promotions, when you contact us on our website or via email with a question or comment or participate in an online survey;
- 1.3 Other methods from which we may collect and add your personal information to our customer database. If you choose to restrict our collection or use of your personal information, it may affect the services provided to you.

## 2. Information We Collect

Information collected depends on the products and services you use or have used, including, but not limited to, the following:

- 2.1 Required information given in account registration, including your username, password, email, and phone number.
- 2.2 Information provided by you on your product, service, lifestyle or recreational preferences, or our assumptions of your preferences based on your purchase history.
- 2.3 Communication details retained during your contact with us, such as call detail records or communication records in written form.
- 2.4 If your mobile device has tracking and positioning abilities, information on your geographical location will be collected (e.g. with GPS or Wi-Fi) when using our service.

## 3. How We Use the Information We Collect

- 3.1 To facilitate PhoneTaxi OP’s operations, such as importing your information into our database for the purposes of analysis, research, troubleshooting, testing, auditing, statistics and investigation.
- 3.2 Improvement of our products and services according to the information we collect.
- 3.3 PhoneTaxi OP partners to send you recommendations (or through the platform of our business partners) of new products, special offers, or other information that may interest you (unless you choose to opt out of receiving them).
- 3.4 According to the information you provide, we may contact you to conduct market research through phone call, fax, email, or mail. We can also customize our mobile app or website based on the preferences of our consumers and users.
- 3.5 Used for authentication, customer service, security, fraud monitoring, archiving and backup purposes, to ensure the safety of the products and services we offer you.
- 3.6 Any other purpose that is directly related to the above situations.
- 3.7 We will only retain your personal information for as long as needed, to the extent permitted by law. After you contact us, we may retain your information for as long as it is reasonably required to facilitate your use of our products and services in the future.

## 4. Sharing Information

We will not sell your personal data to third parties, but will share them in the following cases:

4.1 Sharing under explicit consent: We will share your personal data to other parties with your knowledge.

4.2 Sharing to authorized partners: PhoneTaxi OP may share your information to third-party logistics to arrange the delivery of your product or to provide you other services after making a purchase online. Your personal data is obtained and processed only for specified and lawful reasons, and only required information will be provided to our partners. We do not allow our affiliates and partners to share or use any of your personal data for any other purpose.

4.3 Sharing to business partners whom you receive the products and services from directly during joint business activities or promotions with PhoneTaxi OP.

4.4 Sharing of information is based on law and reasonableness, including, but not limited to: If law, legal process, litigation and/or requests from public and governmental authorities within or outside your country of residence requires, we may share your personal information. In the event that we are involved in reorganization, merger, bankruptcy or litigations, your information may be transferred as part of that transaction. PhoneTaxi OP may also disclose your personal data under reasonable and necessary circumstances, such as to execute our terms and conditions or to protect the customer.

## **5.How to visit your information**

5.1 We will try to take appropriate technical measures to ensure that you can access, update and correct your registration information or use other personal information provided by our service.

5.2 When you visit, update, correct, and delete the aforementioned information, we may require you to authenticate to secure your account.

5.3 You can visit the PhoneTaxi OP 's mobile app or website to login and help us ensure that your information is accurate, complete and update instantly.

5.4 Whenever you voluntarily disclose your personal information, e.g. on social media network such as Facebook, Wechat etc, such information may be collected and used by others. PhoneTaxi OP is not responsible for your personal information disclosure. Therefore, we remind you to consider carefully whether it is necessary to disclose your personal information.

5.5 Our business may require us to transfer your personal data to other countries. We take appropriate steps to ensure that recipients of your personal data are bound by duties of confidentiality and we implement measures such as standard contractual clauses. A copy of those clauses can be obtained by contacting our Support Center.

## **6. Security**

6.1 We use strict procedures and security measures to protect your personal information against unauthorized access, disclosure, use, alteration, damage, or loss of data.

6.2 We will take all reasonable steps to protect your personal information saved on our platform, such as from account registration, recharge and so on. These measures include:

6.2.1 Using encryption to ensure data confidentiality;

6.2.2 Using reliable protection mechanisms to prevent your personal data from hackers and malwares.

6.2.3 Deploying an access control mechanism to ensure that only certain authorized employees within PhoneTaxi OP can access our users' personal data;

6.2.4 Conducting security and privacy training courses on a regular basis to strengthen internal staff knowledge on the importance of protecting personal data.

6.3 PhoneTaxi OP makes every effort to ensure that personal data unrelated to our operations will not be collected. We will only retain your personal data within the time required to achieve the purpose of the privacy policy, unless an extension of the retention period is needed or if it is legally permitted.

6.4 While no security procedures are completely foolproof, we make every effort to protect your personal data.

## **7.Your Rights**

7.1 Subject to limitations in applicable law, you are entitled to object to or request the restriction of processing of your personal data, and to request access to, rectification, erasure and portability of your own personal data.

7.2 Where the use of your information is based on consent, you can withdraw this consent at any time without affecting the lawfulness of processing based on consent before its withdrawal. Requests should be submitted by contacting us through email.

7.3 If you are aware of changes or inaccuracies in your information, you should inform us of such changes

so that our records may be updated or corrected. You may lodge a complaint with a supervisory authority if you consider that our processing of your personal data infringes applicable law.

7.4 We retain your personal data as long as needed to provide services or products to you, or as required or permitted by applicable laws, such as tax and accounting laws.

## **8. Notice**

8.1 We may send email or news to your devices. If you do not wish to receive this information, you can cancel the subscription on the device according to our instructions.

8.2 We may issue announcements to you when necessary (for example, when a service is suspended due to system maintenance). You may not be able to cancel these services and properties that do not belong to promotion.

8.3 We recommend that minors seek parental or guardian consent and guidance before submitting personal information.

## **9. Legal basis for data processing**

We process personal data for the purposes set out in this privacy policy, as described above.

9.1 Our legal basis to process personal data includes processing:

9.1.1 Necessary for the performance of the contract with you. For example, to provide you with the services you request and to identify and authenticate you so you may use the sites;

9.1.2 Necessary to comply with legal requirements. For example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement

9.1.3 Necessary for our legitimate interests. For example, to manage our relationship with you, to ensure the security of our services, to communicate with you about our products and services.

9.2 In some instances, you may be required to provide us with personal data for processing as described above, in order to provide you all of our services, and for you to use all the features of our sites.

## **10. Final Note**

Except the certain services, all of our services apply to this privacy policy. We have the right to revise and update this privacy policy at any time. If we make significant changes to our privacy policy, we will release the latest one on our mobile app and website.