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# **Privacy Policy**



**HBTC-Support** 

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#### 1. Parties

- 1.1 HBTC. (hereinafter referred to as 'the Company') is a company incorporated in Cayman Islands under the laws of Cayman Islands, and operates the Website https://www.hbtc.com (hereinafter referred to as 'this Website' or 'the Website'), which is a platform dedicated to the transaction of digital assets and the provision of related services (hereinafter referred to as 'the Service'). For the convenience of wording in this Agreement, the Company and the Website are referred to collectively as 'we' or other applicable forms of first person pronouns in this Agreement.
- 1.2 All natural persons or other subjects who log onto this Website shall be users of this Website. For the convenience of wording in this Agreement, the users are referred to as 'you' or any other applicable forms of the second-person pronouns. 1.3 For the convenience of wording in this Agreement, you and we are collectively referred to as "both parties", and individually as "one party".

# 2. Purposes of the Privacy Policy

The Privacy Policy stipulates the types of information of yours that we may collect through your log into this Website, your registration with this Website, and/or use the services we offer, as well as how we shall use and protect the information so collected.

#### 3 Your consent

To ensure that you have full confidence in our handling of personal data, you are advised to read and understand the terms of this Privacy Policy in detail. In particular, upon your log into our Website, regardless of whether you register with this Website, you shall be deemed to accept, agree, undertake and confirm that:

- 3.1 You, on the basis of your own free will and your requisite consent, agree to disclose your personal information to us;
- 3.2 You will comply with all the terms and limitations of this Privacy Policy;
- 3.3 You agree that we may collect your information through your log into this Website, your registration with this Website, and/or your using the Services offered by us; you agree to any changes and modifications that we may make to our Privacy Policy in the future;
- 3.4 You agree that our branches, affiliates and employees may contact you in connection with the products and services that you may be interested in (unless you have indicated that you do not want to receive such information).

#### 4. Information Collected

4.1 When you use this Website, you agree to permit us to use cookies to track each of your actions and collect and keep all the information that you leave on this Website, including but not limited to your IP address, location, and other information. 4.2 If you are willing to use the services offered by this Website, you will be required to fill in and provide the following two categories of information:

## 4.2.1 Identity Information.

Such information can help us verify whether you are eligible to be registered as a member of this Website. It includes but is not limited to your name, residence address, mailing address, other certificates and corresponding numbers thereof that are issued by your country or government to certify your identity information, as well as all other information that can help us to verify your identity (hereinafter referred to as 'identity information').

- 4.2.2 Service information. Such information helps us to contact you and provide you with the services, including but not limited to your phone number, fax number, valid email address, mailing address, and information concerning your debit card and/or other accounts (hereinafter collectively referred to as 'service information').
- 4.3 When you use this Website or the services this Website offers, we may collect more information necessary from our exclusive mailboxes or in other manners that we consider as in compliance with

relevant requirements, for the purpose of improving the functions of this Website, enhancing your experience of using this Website and its services as well as the security thereof, or as is required by

any court order, any applicable law, administrative regulation or any order of any other competent government agency.

4.4 If you visit any of links to third-party websites as are listed on this Website or any link of any of our third-party partners, you shall agree to and comply with the separate and independent Privacy Policy of such third party website. We will not bear any liability for the contents and activities of such websites or the partners.

#### 5. Cookies

- 5.1 When you visit our Website, we use Google stats via cookies to record our performance and check the effect of online advertising. Cookies are a small amount of data that is sent to your browser and stored on your computer hard drive. Only when you use your computer to access our Website can the cookies be sent to your computer hard drive.
- 5.2 Cookies are usually used to record the habits and preferences of visitors in browsing the items on our Website. The information collected by cookies is non-registered and collective statistical data and does not involve personal data.
- 5.3 Cookies, which enable the Website or service provider system to recognize your browser and capture and recall information, cannot be used to obtain data on your hard drive, your email address, or your personal data. Most browsers are designed to accept cookies. You can opt to set your browser to reject cookies, or to notify you as soon as possible if you are loaded on cookies. However, if you set your browser to disable cookies, it is possible that you may not be able to launch or use some functions of our Website.
- 6. Purposes of Information
- 6.1 We will use your information that we collect for the following purposes or in the following ways:
- 6.1.1 to provide you with our Services through our Website;
- 6.1.2 to identify and confirm your identity when you use our Website;
- 6.1.3 to improve and upgrade the services of the Website (your information and feedback received by us can help us improve the service of the Website, so that we can more effectively respond to your service requests and support needs);
- 6.1.4 to keep statistics relating to the use of our Website and to be used for data analysis carried out

in cooperation with government agencies, public affairs institutions;

- 6.1.5 to personalize your experience (your information will help us to better respond to your personalized needs);
- 6.1.6 to facilitate transactions (your information, whether public or private, will not be sold, exchanged, transferred, or otherwise provided to any other company on any grounds without your consent, except for where doing so is expressly for the purpose of completing the transaction you require);
- 6.1.7 to send e-mail regularly (the email address that you provide for the purpose of processing orders may be used to receive information on and updates to your orders, in addition to newsletters, updates, related products or services information, etc., that we may send to you from time to time)
- 6.1.8 to meet other purposes as specified in the User Agreement of this Website and all legal means adopted for satisfying such purposes.
- 6.2 We do not sell, trade, or otherwise transfer information or allow others to collect, use information; however, such information does not involve the following parties and does not include the following information: our affiliates, trusted third parties who help us operate our websites, manage our business, or provide services to you, provided that such parties agree to keep such information confidential; When we believe that information disclosure is appropriate, or it is required by any of the applicable laws, regulations, rules or by any order of courts or other competent authorities, and is necessary for executing the strategy of our Website and ensuring the proper functioning of the Website, or as may be necessary for the related parties to provide services, or for the protection of the rights, property or safety of us or other persons. However, your information will not be provided to other parties for marketing, advertising or other purposes.
- 6.3 Our product integrates [U-Share] SDK to collect your device identity information (such as IMEI/ Android ID/IDFA) and the social account you need to share, so as to complete the one-click sharing service. For your information security, we have signed a data security confidentiality agreement with a third-party SDK provider, and these companies will strictly comply with our data privacy and security requirements. We will not share your personally identifiable information with you unless you agree to do so. To facilitate you better understand the data types and usage collected by U-share, and how to protect your personal information, you can log on to https://www.umeng.com/policy for [U-Share] privacy policy.

#### 7. Protection of Personal Data

7.1 We adopt appropriate physical, electronic, management and technical measures so as to protect and safeguard the security of your personal data. We will, to the greatest extent possible, ensure

that any personal data collected through our Website shall be free from being subject to nuisance

by any third party unrelated to us. The security measures that we may take include but are not limited to:

- 7.1.1 Physical measures: records of your personal data will be stored in a properly locked place.
- 7.1.2 Electronic measures: The computer data that contain your personal information will be stored in computer systems and storage medias that are subject to strict login restrictions.
- 7.1.3 Management measures: only staff members duly authorized by us can access your personal data, and these staff members shall comply with our internal code concerning personal data confidentiality.
- 7.1.4 Technical measures: such encryption techniques as Secure Socket Layer Encryption may be used to convey your personal data.
- 7.1.5 Other measures: our network servers are protected by proper 'firewall '.
- 7.2 If you are aware of any security flaws in our Website, please contact us immediately so that we can take appropriate action as soon as possible.
- 7.3 Despite of the above-mentioned technical and security measures, we cannot guarantee that the information transmitted via the Internet is absolutely safe, so we cannot absolutely guarantee that the personal data that you provide to us through our Website will be safe at any time. We will not be held liable for any loss or damage arising from or caused by any event that may occur in connection with unauthorized access to your personal data, and we shall not be held liable for compensation for such loss or damage.

# 8 Modification to the Privacy Policy

We reserve the right to amend the Privacy Policy from time to time and at any time. We will inform you of the modifications made to the Privacy Policy by updating and publishing the effective date of the release of new versions hereof and highlighting the amendments. Sometimes, we may issue a notice to inform you of the modification made in the Privacy Policy, which, however, is not an obligation for us. You shall regularly review the Privacy Policy and focus on its modifications, and if you do not agree to such modifications, you shall immediately stop accessing this Website. When an updated version of this Privacy Policy is released, your continued visit to this Website shall indicate and show that you agree to the update and agree to comply with the updated Privacy Policy.

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9.1 If you have any requests and comments, you can send an email to service@bhex.com, which is the only valid and official email through which we communicate with you, so we will not bear any liability for your failure to using effective contact information, any act or omission.

9.2 We only publish announcements and information on the basis of the valid and effective contact information on this Website or post announcements on this Website; therefore, we shall not be held liable for any loss arising from your trust in the information that has not been obtained through the above-mentioned means.

9.3 If you have any questions regarding our Privacy Policy, you are welcome to contact us at any time.

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