

Updated on: April 25, 2022

Effective on: April 30, 2022

Thank you for using Zeniko and its related services.

Zeniko is legally registered, owned and Shenzhen Zeniko Technology Co.,Ltd. and its affiliated companies (Shenzhen Zeniko Technology, the company, we, or us), through which we provide flash trigger related solutions and services to users.

Zeniko respects and protects user' s privacy. This Privacy Policy will explain to you how Zeniko collects, uses and protects your information. You must read this Privacy Policy carefully and agree to all the terms herein before registering as a user. The terms of this Privacy Policy will become effective and binding on both you and Zeniko immediately upon your registration.

**This Privacy Policy will help you understand the following:**

1. How we collect and use your personal information.
2. How we save your personal information.
3. How we manage and protect your personal information.
4. How we use cookies and similar technologies.
5. How we share, transfer and disclose your personal information.

6. Your rights to your personal information.

7. How we handle children' s personal information.

8. How to update this Privacy Policy.

9. How to contact us.

We are well aware of the importance of personal information to users, and will do our best to protect their safety and reliability. We are committed to maintaining your trust by abiding by the following principles to protect your personal information:

consistency of rights and responsibilities, clear purpose, choice consent, least and sufficiency, safety guarantee, subject participation, publicity and transparency, etc. At the same time, we will take appropriate security protection measures to protect your personal information in accordance with mature security standards in the industry.

## **1. How we collect and use your personal information**

### 1.1 How we collect your personal information

1.1.1 You need to provide your phone number or email account in order to use the products and services of Zeniko, which is the personal information to sign up/log in with the phone number or email account, as the user' s identification information.

Please understand and agree that the phone number or email account you provide can be used by Zeniko to contact you. If you refuse to provide the above information, you will not be able to use Zeniko.

1.1.2 We will collect your operating system type, operating system version, IP address and service log information during your using to record the running status of Zeniko, as well as improve and optimize service experience. If you refuse to provide the above information, you will not be able to use Zeniko.

1.1.3 After completing the process according to Zeniko's registration rules, you have the right to upload, check and receive graphic information or other files, or connect to a Bluetooth device to control the flash through Zeniko APP. The user's name and password validly registered on Zeniko (hereinafter referred to as user name and password) collectively constitute the only valid authentication for the above actions. Certain functions and services of Zeniko will not be available before completing the registration and login process.

1.1.4 You should have the civil capacity applicable to your behavior as stipulated by the laws of the People's Republic of China or the country where you are located in order to use Zeniko. If you do not have the above capacity, you and your guardian shall bear all the consequences arising therefrom in accordance with the law (minors should be accompanied by their guardians when reading).

1.1.5 When you use the sharing function, we will collect the text and pictures you redact or upload, display your profile name, profile photo, posted content and information. If you refuse to provide, then you will not be able to obtain the above services, but it will not affect your use of other functions.

1.1.6 When you use the sharing function or scanning function to take pictures, we need to apply for the permission of camera, photo album and storage, if you refuse the permission, you will not be able to obtain the above services, but it will not affect your use of other functions.

1.1.7 When you use Bluetooth to connect a device, we will collect the mac address of your Bluetooth device. If you refuse to provide, you will not be able to use the above functions, but it will not affect your use of other functions.

1.1.8 When you use the APP sharing function, we will collect your device model, Zeniko version NO. and operating system type to analyze and solve problems about device adaptation. If you refuse to provide, you will not be able to obtain the above services, but it will not affect your use of other functions.

1.1.9 You acknowledge and agree that your contact information (including contact number) provided in the process of using the product or service is used for user message notification, identity verification and security verification. Please rest assured that those messages are mainly used to send verification codes for registration and password modification.

1.1.10 You should properly save your user' s name and password, except with the prior written consent of Zeniko or as otherwise agreed herein, you shall not give, transfer, sell or lend them to others. If your user' s name and password is embezzled by others, please notify Zeniko immediately to avoid or minimize loss. Users shall bear

the loss arisen from network attack, improper custody, transfer or lending of user's name and password, failure to perform the notification obligations under this agreement and other related agreements, or other non-platform reasons, or unavailability of Zeniko in accordance with this agreement arisen therefrom. Zeniko will assume no responsibility.

## 1.2 Access to system permissions

1.2.1 Permission to locate mobile phone: When you use an Android phone to connect to Zeniko Bluetooth device, the APP will apply for location permission, namely ACCESS\_FINE\_LOCATION. The APP needs this permission to collect the user's location through Bluetooth scanning. Such information may come from the user's device, Bluetooth beacons used in locations such as stores and transportation spots. If you refuse to authorize, you will not be able to obtain the above services, but it will not affect your use of other functions.

1.2.2 Permission to camera and photo album: When you use the shooting and uploading functions, the APP will apply for the permission to bring out the camera and photo album. If you refuse to authorize, you will not be able to obtain the above services, but it will not affect your use of other functions.

1.2.3 Permission to access to storage: In order to store the service log information of product operation by writing into the cache, the APP will apply for permission to

access to storage. If you refuse to authorize, you will not be able to obtain the above services, but it will not affect your use of other functions of.

1.2.4 Permission to send SMS: Provide users with SMS notification for registration and login, password modification and other related services.

1.2.5 Permissions to network information: When you use our products or services in network connected status, we will collect the type of network you use to help you upload, save and share data with your friends.

1.2.6 Bluetooth permission: The APP will apply for your Bluetooth permission when connecting to a Bluetooth device. If you refuse to authorize, it may affect your normal use of Zeniko, but not the use of other functions.

1.2.7 In order to ensure stable operation and realize proper functions of Zeniko, so that you can use and enjoy more services and functions, our will embed the SDK or other similar applications of authorized partners. After you agree to the privacy policy, we will start the initialization of integrated SDK, collect your device information (including device model, device MAC address, system version, software version number), and log information.

1.3 Exceptions to the authorization and consent for collection and use of personal information

According to relevant laws and administrative regulations, we do not need to ask for your authorization and consent to collect and use your personal information in the following situations:

1.3.1 Related to our performance of obligations under the laws, regulations and regulatory requirements;

1.3.2 Directly related to national interests such as national security and national defense security;

1.3.3 Directly related to public safety, public health and major public interests;

1.3.4 Directly related to criminal investigation, prosecution, trial and execution of judgments;

1.3.5 In order to protect your or others' life, property and other major legitimate rights and interests, but it is difficult to obtain your authorization and consent;

1.3.6 Disclosed to the public by yourself;

1.3.7 Collected from legally publicly disclosed information, such as legal news reports, government information disclosure and other channels;

1.3.8 Necessary to enter into and perform the contract between you and us;

1.3.9 Necessary to maintain safe and stable operation of the products or services provided, such as discovering and handling malfunctions;

1.3.10 Necessary for news organizations to carry out legitimate news reports;

1.3.11 Necessary to carry out statistical or academic research in the public interest, and the personal information contained in the results of which is de-identified before disclosing to the public;

1.3.12 Other situations stipulated by laws and regulations. Please understand that the functions and services we provide are constantly updated and developed. If a function or service not in the above description collect your information, we will explain the content, scope and purpose of information collected through page prompts, interactive processes, website announcements, etc., and obtain your consent.

#### 1.4 How we use your personal information

When we need to perform our obligations to you under the user agreement and/or service contract, statutory obligations to which we are bound, or when we assess it is necessary to protect our or third parties' legitimate interests, we will process your personal information for the purposes described in this Privacy Policy under your consent. We will use your personal information strictly in accordance with this Privacy Policy and its updates. Your personal information will only be used for the purposes specified and with your consent at the time of collection. We will apply for your consent in advance if it is used for other purposes. The purpose of collecting user information and personal information is to provide better products and services, and

to ensure that we comply with laws and regulations. We use your user information and personal information for the following purposes:

1.4.1 Product Services. Provide, process, maintain, improve, develop our products and/or services, including customer support, and other services provided through equipment or products.

1.4.2 Statistical analysis. Analyze and develop statistical information related to the use of our products and services to better improve those products and services.

1.4.3 Create your account information. Personal information collected in creating an account through our products or services is used to establish the user's personal account and profile page.

1.4.4 Improve user experience. Analyze the data on how users use our products and services, to better understand how users access to and use our services, respond to your needs and improve user experience.

1.4.5 User identity validation. Verify the SMS message when logging in to ensure that unauthorized user cannot log in, unless he/she performs user identity validation in accordance with the legal requirements.

1.4.6 Send Notifications. We may use personal information (mobile phone number) to send notices of changes to product terms, conditions and policies.

1.4.7 Collect user feedback. Your feedback is invaluable in helping us improve services.

In order to track your feedback, we may use the personal information provided to contact you and keep records.

1.4.8 Others. Save and maintain your information for the purposes of operating our business or performing with legal obligations. When we need to use the information for other purposes not specified herein, we will ask for your prior consent. We will not provide user's personal information and behavioral data to third parties for use without consent.

## 1.5 Third-party service providers and their services

Please note:

1.5.1 Zeniko and related services may contain links to third party websites, products and services. You can choose whether to access or accept websites, products and services provided by third parties

1.5.2 We have no right to control the privacy and data protection policies of third parties who are not bound by this policy. Before submitting personal information to third parties, please refer to their privacy policies.

## **2. How we save your personal information**

2.1 Location of information storage: We will save users' personal information collected in China domestically in accordance with laws and regulations.

2.2 Duration of information storage: The retention period for the personal information we collect is the minimum period necessary to achieve the purpose of collection described herein, unless a longer retention period is required by law. After the above retention period is expired, we will delete or anonymize your personal information. If our products or services cease operating, we will notify you by push notifications, announcements, etc., and delete or anonymize your personal information within a reasonable period.

### **3. How we manage and protect your personal information**

3.1 We have adopted industry-standard security measures to protect your personal information, prevent unauthorized access, public disclosure, use, modification, damage or loss of your personal information.

3.2 We will use various safety measures within a reasonable security level to ensure the security of information. For example, we will use encryption technology (such as SSL), anonymization and other means to protect your personal information, try the best to prevent your data from being lost, stolen or tampered with.

3.3 We strengthen the security capabilities of the application installed on your device through continuously improving technical means, to prevent the leakage of your personal information. For example, we encrypt part of the information locally on your device to ensure the secure transmission. In order to prevent viruses, Trojans or other

malicious programs and websites, we will check the information of applications installed on your device or the running process information.

3.4 We have established dedicated management systems, processes and organizations to ensure the security of your personal information. For example, we will deploy access control mechanisms, strictly limit access rights, ensure that only authorized employees can access to personal information, require related employees to comply with confidentiality obligations and conduct audits.

3.5 When a security incident such as personal information leakage occurs, we will promptly inform you the basic conditions and possible impact of the security incident, measures we have taken or will take to deal with, suggestions you can prevent and reduce risks on your own, remedial measures for you, etc. in accordance with requirements of laws and regulations, normative documents and national standards. We will promptly notify you of relevant information of the event by push notifications, announcements, etc. While it is difficult to inform the personal information subjects individually, we will publish announcements in a reasonable and effective way. At the same time, we will also proactively report the handling of personal information security incidents in accordance with the requirements of regulatory authorities.

#### **4. How we use cookies and similar technologies**

4.1 About cookies and similar technologies:

When you use Zeniko and related services, we may use cookies and similar technologies to collect and save information during your access and use, so as to optimize the design accordingly and provide a better user experience.

#### 4.2 How we use cookies and similar technologies:

We use cookies and similar technologies mainly to achieve the following functions or services:

4.2.1 Ensuring safe and efficient operation of products and services: We may set cookies or anonymous identifiers for authentication and security to confirm safe login, or illegal acts such as theft and fraud. Such technologies also help us improve the efficiency of services and speed of login and response.

4.2.2 Helping you have an easier access experience: You can reduce the steps and processes of repeatedly filling in personal information and entering search content through using such technologies, such as recording search history.

### **5. How we share, transfer and disclose your personal information**

#### 5.1 How we share your personal information

5.1.1 Under certain circumstances, we will only share your information with our partners based on the legitimate, proper and necessary purposes stated in this Privacy Policy and with your explicit consent. In such cases, our partners will only have access

to the information they need to perform their duties and must not use the information for any other purpose. Currently, our authorized partners include the following:

Suppliers, service providers and other partners. We may share your personal information with suppliers, service providers and other partners who support our business, in order to provide the necessary supports to achieve product features and services, which include providing technical infrastructure services, analyzing how our services are used and their effectiveness, etc.

5.1.2 We will sign strict confidentiality agreements with partners, agree on strict data protection measures, and require them to handle personal information in accordance with our instructions, this Privacy Policy and any other relevant confidentiality and security measures.

5.1.3 Please note that even if we have obtained your authorization and consent, we will only share your personal information for legitimate, proper and necessary purposes, and will only share the personal information necessary to provide the above services, try to de-identify or anonymize the shared personal information.

5.1.4 We hereby ask for your special attention that if specific information cannot be used to verify your identity or reflect your activities individually or in combination with other information, then it does not belong to personal information in the legal sense. When specific information can be used to verify your identity or reflect your activities individually or in combination with other information, it will be treated and protected

as your personal information in accordance with this Privacy Policy during the combined use.

## **5.2 How we transfer your personal information**

We will not transfer your personal information to any company, organization or individual, except in the following situations:

5.2.1 With your authorization and consent. We will first inform you of the purpose of transferring personal information and the type of data recipient, and then transfer your personal information to third parties only with your consent;

5.2.2 If personal information transfer is involved in mergers, acquisitions, asset transfers and other similar transactions, we will require new companies and organizations hold your personal information to continue to be bound by this personal information protection policy, otherwise we will require them seek your authorization and consent again.

## **5.3 How we disclose your personal information**

We will only disclose your personal information under the following circumstances:

5.3.1 We will inform you of the purpose and type of personal information disclosure, and obtain your explicit consent or authorization in advance;

5.3.2 We may disclose your personal information in accordance with laws and regulations, legal proceedings, or mandatory requirements of government authorities.

## **5.4 Exceptions to authorized consent for sharing, transferring or disclosing of personal information**

We will not share, transfer or disclose your personal information to companies, organizations and individuals other than our partners and affiliates, except in the following situations:

- a. Obtained your consent;
- b. Necessary for conclusion and performance of a contract to which you are a party, or necessary for the implementation of human resources management in accordance with legal labor rules and regulations and collective contracts;
- c. Necessary to perform statutory duties or obligations;
- d. Necessary to respond to public health emergencies, or to protect the life, health and property safety of natural persons in emergencies;
- e. Implement news reports, public opinion supervision and other acts for the public interest, and process personal information within a reasonable extent;
- f. Process personal information that has been disclosed by individuals themselves or legally disclosed within a reasonable scope in accordance with this policy;
- g. Other circumstances stipulated by laws and administrative regulations.

## **6. Your rights to your personal information**

In accordance with relevant Chinese laws, regulations, standards, and common practices in other countries and regions, we guarantee that you exercise the following rights over your personal information:

6.1 We will inform you of how we handle your personal information by publishing this Privacy Policy, and through specific announcements, text messages or email notifications as required by law. We are committed to ensuring transparency in the use of your information. You can regularly review this Privacy Policy and its updates, contact us about the collection and use of your personal information through the methods disclosed herein.

6.2 You have the right to access and edit your personal information, except for conditions stipulated by laws and regulations. If you wish to access or edit the profile information in your account, you can modify the profile photo, profile name, gender, etc. by visiting: "Me" - "Edit".

6.3 You have the right to ask us to correct or supplement your personal information if you find it incorrect or incomplete. We currently do not provide a channel to modify your personal information by yourself, you can contact us and request to correct or supplement your personal information through the methods disclosed herein. For specific contact information, please refer to the "How to contact us" section.

6.4 You may choose to delete certain personal information you provide. You can contact us and request to delete your personal information through the methods

disclosed herein. For specific contact information, please refer to the "How to contact us" section.

6.4.1 You may request to delete personal information in the following circumstances:

- a. If our processing of personal information violates laws and regulations;
- b. If we collect and use your personal information without your consent;
- c. If our processing of personal information violates our agreement with you;
- d. If you no longer use our products and services, or you have cancelled your account;
- e. If we no longer provide you with products or services.

6.4.2 If we decide to delete your personal information as request, we will also notify affiliated companies or partners that have obtained your personal information from us and require them to delete it in a timely manner, unless it' s otherwise provided by laws and regulations, or these affiliated companies or partners have obtained your independent authorization. When you have deleted personal information from our products and services, we may not delete the corresponding personal information from the backup system immediately, however we will delete when updating the backup.

6.5 You may apply to close your Zeniko account only if you fulfill the following conditions:

- a. You can only apply to close your own Zeniko account according to the procedures;
- b. You should still be responsible for your behaviors before closing your account and in the using of the Zeniko service;
- c. Account records and functions can not be resumed or provided after closing.

When closing your account, please open Zeniko APP, go to **【Me】** - **【Account and Security】** - **【Close account】** and follow the instructions to close.

6.6 To cancel the authorization, each business function requires certain basic personal information to be completed (see the **【How we collect and use your personal information】** of this Privacy Policy). You can change the scope of your authorization to continue to collect personal information or withdraw your authorization by deleting personal information, closing device permission settings, changing related product or function setting pages, or close your account, but your decision to withdraw consent will not affect previous processing of personal information based on your authorization.

6.7 In response to your above request and to ensure data security, we will verify your identity before processing and respond within 7 working days. We do not charge any fees for reasonable request in principle. However, for repeated requests that exceed a reasonable limit, we will charge cost as appropriate. Despite the above agreement, we will not be able to respond to your request in accordance with laws, regulations or regulatory requirements in the following circumstances:

- a. Related to our performance of obligations under laws and regulations;
- b. Directly related to national security and national defense security;
- c. Directly related to public safety, public health, and major public interests;
- d. Directly related to criminal investigation, prosecution, trial and execution of judgments;
- e. Sufficient evidences show that you have subjective malice or abuse your authority;
- f. In order to protect your or others' personal life, property and other major legitimate rights and interests, but it is difficult to obtain consent;
- g. Responding to your request will cause serious damage to the legitimate rights and interests of you or other individuals or organizations;
- h. Involving trade secrets.

6.8 We will promptly respond to your request to change, delete information or withdraw authorization. If manual operation is required, the verification and processing will be completed within 7 working days.

## **7. How we handle children' s personal information**

7.1 Children in this policy refer to individuals under the age of 14, they are not allowed to create their own user accounts without the consent of their parents or guardians. If you are a minor, it is recommended to ask your parents or guardians to read this

Privacy Policy carefully, and use our services or provide us with information with the consent of them.

7.2 For the collection of minors' personal information using our products or services with the consent of parents or guardians, we will only use, share, transfer or disclose this information as permitted by laws and regulations, with the explicit consent of parents or guardians, or as necessary to protect minors. If we discover that we have collected children' s personal information without verifiable prior parental consent, we will delete relevant data as soon as possible.

## **8. How to update this Privacy Policy**

We may make adjustments or changes to this Privacy Policy from time to time. Any updates to this Privacy Policy will be posted on the mobile device by marking the update time. Unless otherwise mandatory by laws, regulations or regulatory requirements, the adjusted or changed content will take effect within 7 days after notification or publication. Please pay attention to changes in relevant announcements, reminders, agreements, rules and other related content from time to time. If you do not agree with the adjusted or changed content of this privacy policy, you should immediately stop using the corresponding service and close the relevant account, and we will stop collecting your personal information. But if you continue to use Zeniko products or services, we believe you have fully read, understood and accepted the revised personal information protection and privacy policy.

## **9. How to contact us**

Shenzhen Zeniko Technology Co., Ltd.Add: Room 1208, Jinshan Building, No. 5033

Shennan East Road, Xinwei Community.Gulyuan Street Luohu District, Shenzhen

518010, ChinaTel +86-755-25106331

If you have any questions or need help, you may send an email to [appsupport@zeniko.com](mailto:appsupport@zeniko.com), we will review the issues involved as soon as possible after receiving your questions, comments, and suggestions, and reply within 7 working days after verifying your user identity under normal circumstances.

### **Third party SDK directory accessed by the platform**

The following is the description of the name, use purpose, information acquisition and official website link address of the third-party SDK we access, so that you can better understand your personal information use and protection:

Tencent BuglySDK

Purpose: To capture online error logs

Information: indicates the device identifier

The website link: <https://bugly.qq.com/>