

PRIVACY POLICY

In order to provide you with our services, we will ask you to provide the necessary personal data needed to provide the services. Shenzhen ORVIBO Technology Co., Ltd. (here simply referred to as "ORVIBO", "We") is committed to protecting your privacy. Through this privacy policy, we will explain to you the purpose, method and scope of our collection and use of your personal data, your rights to your personal data, and explain to you the security protection measures we have taken to protect the security of data.

The personal data indicated in this policy refers to any data related to the identity of an identified or identifiable natural person. We will collect, use, disclose, transmit and store your personal data when you are using our website, mobile applications or services.

Please read this "Privacy Policy" carefully to understand our privacy practice before using our products (or services) and submitting personal data. If you have any questions about the data processing practices outlined in this privacy policy, please contact us by security@orvibo.com so that we can deal with your needs. We are happy to answer your questions directly. If you agree to the content of this policy, we will continue to provide you with services.

PERSONAL DATA WE COLLECT

1. Data you voluntarily provide to us

- Account or profile data: When you register our account, we may collect your name and contact info, such as your name, email address, mail address, phone number, user name, and login credentials.
- Name: When you visit our website, fill in our online form or communicate with our support team, we may collect data about your name and position, such as your name, email address, country / region and job /company data.
- Job application data: When you apply for our position, we may collect data about your education and professional experience, such as school, course of study, degree obtained, education degrees, scores, working experience, professional certificate /proof obtained.

2. Data we may collect

- When you use our websites and services, we may collect certain data about your use of the websites and services, including personal data:
- Devices data: When you interact with our websites and services through hardware, we will automatically collect devices data, such as the devices' Unique Device Identification Identifier ("UDID"), MAC address, IP address, wireless connection data, operating system type and version, browser type and version, push notification identifier, and mobile network data.
- Usage data: During your interaction with our websites and services, we will automatically collect usage data related to visits, clicks, downloads, sending / receiving messages, and other usage of our websites and services.

- Location data: When you interact with our websites and services through the device, we may collect real-time accurate or non-precise geolocation data about you.
- Smart device data: "Smart device" refers to non-standard computing devices produced or manufactured by hardware manufacturers that have a human-machine interface and can transmit data through wireless networks, including smart home appliances, gateways, controllers, etc. When you use a smart device connected to our services, depending on the capabilities of your smart device, we may collect certain types of data to provide the services you request or purchase, such as videos, images, health-related data, etc.

PURPOSE AND BASIS FOR PROCESSING PERSONAL DATA

Our basis for processing your personal data is that your continued acceptance and use of our services is deemed to agree to the content described in this policy. The purpose of processing your personal data is as follows:

- **Provide You Services**

We need to process your account and profile data, device information, usage data, location information, and related information of smart device before provide you with our products and services that you have requested or purchased.

- **Improve Our Services**

We will process your device information, usage data, location information and smart devices' related information to ensure the functions and safety of our products to develop and improve our products and services, to analyze the efficiency of our operations, and to prevent and trace fraudulent or inappropriate usage.

- **Non-marketing communication**

We process your personal data to send you important information about the changes of related services, our terms, conditions, and policies and/or other administrative information. Because this information may be important, you can choose to quit receiving such communications.

- **Marketing communication**

We may process your personal data to provide marketing and promotional materials to you on our Products and Services. If we do so, each communication we send you will contain instructions permitting you to quit receiving future such kind of communications.

- **Personalization**

We may process your account and profile data, usage data, device information to personalize product design and to provide you with services tailor-made for you, such as recommending and displaying information and advertisements regarding products suited to you, and to invite you to participate in surveys relating to your use of our Products. The basis for this processing is according to your permission.

- **Legal compliance**

When we think it is necessary or appropriate, we may process your personal data under the condition of:

- a. Compliance with applicable laws and regulations;
- b. Compliance with legal procedures;
- c. Respond to requests from public and government agencies (including public and government agencies) outside your country of residence;
- d. Enforce our terms and conditions;
- e. Protect our operations, business and systems;
- f. Protect the rights, privacy, security or property of us and other users including you;
- g. enables us to seek available remedies or limit the damage we may suffer.

WHO DO WE SHARE PERSONAL DATA WITH

We may share your personal data with the following recipients:

- To our third-party service providers who perform certain business-related functions for us, such as website hosting, data analysis, payment and credit card processing, infrastructure provision, IT services, customer support service, e-mail delivery services, and other similar services to enable them to provide services to us.

- To our customers and other business partners who provide you, directly or indirectly, with your Smart Devices, and/or networks and systems through which you access and use our Sites and Services.

- To an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including without limitation in connection with any bankruptcy or similar proceedings). In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, incompatible new uses of your personal data, and choices you may have regarding your personal data.

- As we believe to be necessary or appropriate:
 - a. Compliance with applicable laws and regulations;
 - b. Compliance with legal procedures;
 - c. Respond to requests from public and government agencies (including public and government agencies) outside your country of residence;
 - d. Enforce our terms and conditions;
 - e. Protect our operations, business and systems;
 - f. Protect the rights, privacy, security or property of us and other users including you;
 - g. enables us to seek available remedies or limit the damage we may suffer.

- Except for the third parties described above, to third parties only with your consent.

YOUR RIGHTS RELATING TO YOUR PERSONAL DATA

ORVIBO respects your right to your personal data. The following lists your rights in accordance with the law and how we will protect your rights. For your reasonable request, we do not charge fees in principle. We may refuse to bring risks to other people's legal rights or very unrealistic requests. In addition, if your request directly involves national security, national defense security, public health, criminal investigation, and other matters directly related to the public interest, or may cause serious damage to the legal rights of you or other individuals or organizations, we may not be able to respond to your request.

- Right to be informed: We announce this privacy policy to inform you how we handle your personal data. We are committed to transparency in the use of your data.
- Access right: You can directly query or access your personal data in our product or service interface, including you can log in through your account at any time to browse your historical order data in our official mall. If you are unable to inquire or access your personal data by yourself, or encounter any problems in the exercise of data access rights, you can request access by contacting our data protection officer security@orvibo.com.

- Right of correction: When you find that the personal data we process about you is wrong or incomplete, you have the right to ask us to make corrections or supplements. For some of your personal data, you can directly correct or modify it on the relevant function page of the product or service. For personal data that has not been provided to you to modify channels by yourself, you can request to correct or supplement your personal data by contacting our data protection officer security@orvibo.com.
- Right to delete: When you find that we have violated the provisions of laws, administrative regulations or this privacy policy to collect and use your personal data, you have the right to request us to delete relevant personal data. You can ask us to delete or anonymize the personal data you submitted by contacting our data protection officer [by security@orvibo.com](mailto:security@orvibo.com).
- Withdrawal of consent: Each business function may require some basic personal data to be completed. For the collection and use of additional collected personal data, you can give or withdraw your authorized consent at any time. If you withdraw your authorized consent, we will no longer be able to provide you with the services corresponding to the withdrawal of your consent or authorization. When you withdraw your consent, we will no longer process the corresponding personal data, but your decision to withdraw your consent will not affect the processing of personal data previously carried out based on your authorization.

- Right to complain: You have the right to contact the online customer service complaint by dialing 400-060-6050. We will respond within 30 days from the date of receiving your complaint. If you are dissatisfied with our response, especially if our personal data processing behavior damages your legitimate rights and interests, you can also file a complaint or report to the supervisory departments such as cybersecurity, public security, industry and commerce, or file a lawsuit with a competent court.

DATA SECURITY

We use commercially reasonable physical, administrative and technical protection measures to maintain the integrity and security of your personal data. ORVIBO provides various security strategies that can effectively ensure the data security of users and devices. For device access, ORVIBO proprietary algorithms are used to ensure data isolation, access identity verification, and apply for authorization. For data communication, communication using security algorithms and transmission encryption protocols and commercial-grade data encrypted transmission based on dynamic keys are supported. For data processing, strict data filtering and verification and complete data review will be applied. For data storage, all confidential data of the user will be securely encrypted for storage. We will take all feasible steps to protect your personal data. However, you should be aware that the use of the Internet is not always safe. Therefore, we cannot guarantee the security or integrity of any personal data when it is transmitted bi-directionally over the Internet.

We will take corresponding measures for personal data leakage, such as notifying the relevant regulatory authorities of the leakage, or in some cases informing the data subject of personal data leakage in accordance with usage laws (including your local data protection laws).

WHAT YOU SHOULD DO

You can play your role in protecting your personal data, and do not disclose your login password or account data to anyone unless this person obtains your official authorization. Whenever you log in to your account, especially when logging in on someone else's computer or public Internet terminal, you should log out and log out in time when the session ends.

We are not liable for security omissions caused by third parties accessing your personal data due to your failure to maintain the privacy of personal data. Despite the above provisions, if any other user on the Internet uses your account without authorization or any other security breach, you must notify us immediately. Your assistance will help us protect the privacy of your personal data.

DATA RETENTION PERIOD

We will process your personal data within the minimum period specified in this privacy policy, unless there are special laws that require us to retain the data for a longer retention period. We will determine the appropriate retention period based on the amount, nature and sensitivity of your personal data, and after the retention period

ends, we will destroy your personal data. When this is not possible due to technical reasons, we will ensure that appropriate measures are taken to prevent further use of your personal data.

MINOR REGULATIONS

- We believe that it is the responsibility of parents / guardians to supervise the use of our products and services by minors. However, our policy does not require obtaining personal data of minors or sending any promotional materials to such groups.
- We will not seek or seek to receive any personal data from minors. If a parent or guardian has reason to believe that a minor has provided us with personal data without their prior consent, please contact us to ensure that such personal data is deleted, and to ensure that the minor cancels any subscription to any applicable ORVIBO services.

CHANGES TO THIS POLICY

We may update this privacy policy to reflect changes to our data practices. If we make any major changes, we will notify you by email (sent to the email address specified in your account) or notification in the mobile application before the change takes effect.

We encourage you to check this page regularly for the latest data about our privacy practices.

HOW TO CONTACT US?

If you have any questions about our practices or this privacy policy, please contact us

via:

Shenzhen ORVIBO Technology Co., Ltd.

Address: 7F, Block A7, Nanshan I Park, No1001 Xueyuan Road, Nanshan

District, Shenzhen, China

Postcode: 518071

Email: security@orvibo.com

Phone: 400-060-6050