

# PRIVACY POLICY

We've updated our Privacy Policy and improved our privacy practices so we can better safeguard your data. This website may also use cookies to personalize your experience. By continuing to use our website, you accept the terms of our updated Privacy Policy and Cookies.

## *Privacy Policy and Information Notice*

Thank you for visiting our website ("Site") [www.guotaiglobal.com](http://www.guotaiglobal.com) operated by Guotai Global LLC (the "Company") is committed to treating the personal and corporate information of our Site users, customers, and vendors with respect and sensitivity.

We've updated our Privacy Policy and improved our privacy practices so we can better safeguard your data. This Site also uses cookies to personalize your experience and target advertising. By continuing to use our Site, you accept the terms of this Privacy Policy, our [Terms of Use](#), and our Cookies policy.

This Privacy Policy (together with our Terms of Use and any other policies referenced) identifies how we will collect and process any personally identifiable information, such as your name, email, address, financial account information, etc., that we collect from you, or that you provide to us.

If you are a resident of the European Economic Area ("EEA"), this Privacy Policy also outlines additional policies applicable to our collection and processing of your personal information.

As our services evolve and we perceive the need or desirability of using your personal data collected in other ways, we may from time to time amend this Privacy Policy. The effective date appears at the end of this Privacy Policy. We encourage you to check our Site frequently to review the current Privacy Policy in effect and any changes that may have been made to it.

***By providing your Personal Data to us in any format (e.g., via email, telephone, fax, or in person) and/or continuing to use any of our services or visiting our Site you accept and consent to the practices described in this Privacy Policy and Information Notice.***

# WHAT PERSONAL DATA DOES THE COMPANY COLLECT?

We collect personal information that you enter on our Site or otherwise volunteer to us when you contact us to, among other things, make purchases or request information. You can choose not to provide certain information, but then you might not be able to take advantage of many of our features.

For purposes of this Policy, “*Personal Data*” means information (whether stored electronically or in paper-based filing systems) relating to a living individual who can be identified from that data (or from that data and other information in our possession). Personal Data can be:

- factual – such as a name, address, email, phone, or date of birth
- sensitive – such as financial account information, protected health or medical details or information about your racial or ethnic origin, political opinions, religious or similar beliefs, physical or mental health or condition or sexual life; or
- opinion – such as the results of a self-assessment test.

GUOTAI GLOBAL collects only that Personal Data that is relevant for the purposes for which the data is requested. GUOTAI GLOBAL does not use your Personal Data in any way that is incompatible with the purposes for which it was collected or for which you have consented.

You can visit our Site without telling us who you are or revealing any Personal Data. But in some circumstances, we may ask you for and you may submit Personal Data, which may include:

## INFORMATION YOU GIVE US

When you contact us through our Site, or by corresponding with us by phone, e-mail, or otherwise, or meet us at an GUOTAI GLOBAL event, we may collect Personal Data including:

- contact information, such as name, address, email, and phone;
- financial information, such as credit card and account information collected when you purchase products or services;
- identification information, such as gender and date of birth;
- for those considering careers with GUOTAI GLOBAL, professional personal information such as a resumé or C.V., salary history, education history, citizenship information, and position sought, as applicable;
- for current or prospective affiliates, suppliers, and subcontractors, personal information such as social security number, federal tax ID number, or other relevant information, as applicable.

When considering an individual for employment, additional Personal Data may be collected, as set forth in our Employee Privacy Policy.

## INFORMATION WE COLLECT ABOUT YOU

When you visit our Site, our web server automatically collects and stores the following information:

- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, website address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), pages on our Site you viewed; page response times, download errors, duration of page visits, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.

This information helps us improve our Site and facilitates your online experience when accessing our Site.

## INFORMATION WE RECEIVE FROM OTHER SOURCES

This is information we receive about you from third parties who operate other Sites or services we use to provide our products and services to you. We work closely with third parties, including, for example, business partners, promoters, affiliates, and sub-contractors in technical, payment and delivery services, advertising networks, marketing analytics providers, promotions, and search information providers. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

## COOKIES

Our Site uses cookies to personalize your experience and target advertising.

## 2.HOW DOES THE COMPANY USE PERSONAL DATA?

## INFORMATION YOU GIVE TO US

We will use this information:

- to provide you with the information, products, and services that you request from us;
- to carry out our obligations arising from any contracts entered into between you and us, or between you and our promoters, affiliates, or distributors;
- to contact you in the future to provide you with information about other goods and services we offer, or that are offered by our affiliates or third-party vendors;
- to notify you about changes to our service;
- to comply with applicable laws and regulations;
- for training purposes, quality assurance, and to record details about the products and services you order from us;
- to make inquiries about you for credit reference purposes;
- to perform data analyses (including anonymization and aggregation of Personal Data);
- for prospective employees, to respond to your job application and process your CV.

## INFORMATION WE COLLECT ABOUT YOU. WE WILL USE THIS INFORMATION:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- as part of our efforts to keep our site safe and secure.

## INFORMATION WE RECEIVE FROM OTHER SOURCES.

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## 3.DO WE SHARE YOUR PERSONAL DATA WITH ANY THIRD PARTIES?

We do not sell your Personal Data to any third parties. We partner with third parties to provide some of the services and products available on our Site and at our events. We sometimes disclose your Personal Data to those third parties, and they sometimes collect your Personal Data in the first instance and provide it to us. All such third parties use your Personal Data only on behalf of GUOTAI GLOBAL and under the instructions of GUOTAI GLOBAL on how your information may be used and processed. GUOTAI GLOBAL and our partners will use your Personal Data for

limited purposes as specified in this Policy. GUOTAI GLOBAL takes reasonable steps to ensure these third parties use your Personal Data only for the purposes for which they have been engaged by GUOTAI GLOBAL and that they agree to provide protections for your Personal Data that are no less protective than those set out in this Policy.

By visiting our Site or attending our events and sharing your Personal Data, you agree that we have the right to share your personal information with selected third parties including:

- **Sales** – business partners, promoters, affiliates, distributors, suppliers, and sub-contractors for the purpose of fulfilling requests from you to purchase goods and services from our Site or at our events;
- **Marketing** – business partners, promoters, affiliates, distributors, suppliers, and sub-contractors for the purpose of direct marketing of goods and services that you may be interested in;
- **Cloud services** – business partners, promoters, affiliates, distributors, suppliers, and sub-contractors that provide cloud storage services;
- **Contractual performance** – business partners, promoters, affiliates, distributors, suppliers, and sub-contractors for the performance of any contract we enter into with you, or they enter with you on behalf of GUOTAI GLOBAL;
- **Web analytics** – analytics and search engine providers that assist us in the improvement and optimization of our site;

## WE MAY ALSO DISCLOSE YOUR PERSONAL INFORMATION TO THIRD PARTIES IN THE FOLLOWING CIRCUMSTANCES:

- In the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets as part of the purchase, transfer, or sale of services or assets;
- If we sell all or substantially all of our assets to a third party, in which case personal information about our customers will be one of the transferred assets;
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of us, our customers, or others.

Whenever we share information with third parties, we will take steps to ensure that the third parties put in place adequate measures to safeguard your Personal Data, and they will be required to use any Personal Data for only the intended purpose for which it was shared.

## 4.OUR STORAGE OF YOUR PERSONAL DATA

GUOTAI GLOBAL uses reasonable and appropriate measures to protect your Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing undertaken and the nature of the Personal Data we collect.

We will keep your personal data for as long as we need it, or as otherwise prescribed by law, for the purposes set out above. This period will vary depending on your interactions with us. We may also keep a record of correspondence with you (for example if you have made a complaint about a product) for as long as is necessary to protect us from a legal claim.

You may unsubscribe from any of our online e-mail updates and marketing by following the unsubscribe instructions in the body of any e-mail message we have sent to you. We will take commercially reasonable steps to implement your unsubscribe requests promptly, but you may still receive promotional information from us by mail for up to 60 days, and up to 10 days for e-mail. You may also continue to receive information from those third parties to whom we have previously disclosed your Personal Data.

Please note that when you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

## 5.ACCESS TO OTHER WEBSITES

Our Site may include links to and from other websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites are not covered by this Privacy Policy. We are not responsible for the privacy practices of any third parties or the content of linked sites although we do encourage you to read the applicable privacy policies and terms and conditions of such parties or websites. This Privacy Policy only applies to how GUOTAI GLOBAL deals with your Personal Data, and it does not apply to any other company or any other company's websites even if you access them via our Site. Please check those websites' policies before you submit any Personal Data to them.

## 6.PROTECTING CHILDREN'S PRIVACY

We are strongly committed to protecting the safety and privacy of children who visit our Site. Our Site is not designed nor is it intended to be used by children under 13, and we do not knowingly collect personal information online from children under 13 and have adopted techniques to ensure compliance with this Privacy Policy and the Children's Online Privacy Protection Act of 1998 ("COPPA"). Our Site includes content that we believe to be unsuitable for children under 13, and we encourage all parents to talk to their children about online safety and to monitor their children's use of the Internet.

## 7. ADDITIONAL POLICIES IN COMPLIANCE WITH THE EEA PRIVACY LAWS

In addition to the other policies described in this Privacy Policy, residents of the European Union or the EEA are afforded the following additional rights and protections as required by the General Data Privacy Regulation (“GDPR”). The additional rights and protections set forth in this section of this Policy apply only to residents of the European Union or the EEA.

### 7.1 GDPR DEFINITIONS

#### THE FOLLOWING ADDITIONAL DEFINITIONS APPLY TO THIS SECTION OF THE PRIVACY POLICY:

“*Controller*” means the Company which is the organization that determines the purposes for which, and the manner in which, any Personal Data is Processed and used in its business.

“*Processor*” means any Person Processing Personal Data.

“*Person*” means a natural person, corporation, association, organization, partnership, or other legal entity.

“*Processing*” is any activity that involves use of the Personal Data. It includes, without limitation, obtaining, recording or holding the Personal Data, or carrying out any operation or set of operations on the Personal Data including organizing, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes Personal Data to third parties.

### 7.2 THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

In order to comply with the GDPR, we are required to set out the legal basis for the processing of your Personal Data. In accordance with the purposes for which we collect and use your Personal Data, as set out above, the legal basis for processing your Personal Data will typically be one of the following:

- our own legitimate business interests, or the legitimate business interests of our third party partners, promoters, affiliates, distributors, suppliers, vendors, and subcontractors, such as,

for example, providing direct marketing to our customers of our products and services that we think would be of interest, permitting prospective employees to search and apply for job opportunities, handling inquiries from our promoters, affiliates, distributors, vendors, and customers, or other instances where we have a legitimate interests assessment and have established an existing legitimate interest;

- the performance of a contract that we have in place with you;
- your consent where appropriate; or
- compliance with our legal obligations, including to meet national security or law enforcement requirements.

## 7.3 WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you is stored on our servers or on servers provided by cloud service providers, such as Amazon Web Services/and or hosting by GoDaddy. If you are a resident of the EEA, your Personal Data may be transferred within or outside the EEA to areas where privacy laws may be less strict than in the EEA. By submitting your Personal Data, you agree to this transfer, storing, and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## 7.4 ADDENDUM TO HOW LONG WE STORE YOUR PERSONAL DATA

In some cases, there is a legal requirement to keep Personal Data for a minimum period of time. Except in those circumstances, we do not keep your Personal Data for any longer than is necessary for the purposes for which the Personal Data was collected or for which it is to be further processed.

## 7.5 YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA

Subject to certain exceptions, you have the following rights with respect to your Personal Data:

- To receive a copy of the Personal Data that we hold about you;



- To request that any inaccurate or incomplete Personal Data be corrected or supplemented;
- To have your Personal Data erased, unless we have a legitimate reason to retain the Personal Data (such as if we are required to do so for legal reasons); and
- To ask us not to process your Personal Data for a particular purpose, including for marketing.

All of these rights are subject to certain conditions and exemptions. For example, GUOTAI GLOBAL will not be obligated to erase your Personal Data if we need to retain it to protect ourselves in the event of a legal claim.

To exercise any of these rights, please submit a written request to us using the contact information set forth below. The Company reserves the right to charge a fee in dealing with such a request as permitted by applicable law and regulations. You may also opt out of receiving additional marketing information by using the unsubscribe feature in any marketing email we send you.

## 8. CONDITIONS OF USE AND CHANGES TO OUR PRIVACY POLICY

If you choose to visit our Site and attend our events, your visit and any dispute over privacy is subject to this Notice and our Terms of Use, including limitations on damages, resolution of disputes, and application of the law of the State of California. If you have any concern about our privacy practices, please contact us with a thorough description, and we will try to resolve it. As our business changes, our Privacy Policy and Terms of Use may change also. We may e-mail periodic reminders of our notices and conditions, but you should check our Site frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account.

## 9. CONTACTING US

This Site is owned and operated by GUOTAI GLOBAL LLC. If you have any questions or suggestions with respect to this Privacy Policy or our privacy practices, please e-mail us at [info@guotaiglobal.com](mailto:info@guotaiglobal.com), or you can contact us by mail at:

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