

Privacy Policy

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GL Technologies (Hong Kong) Limited, and its affiliates and subsidiaries (collectively, “GL” “we” “us,” or “our”) takes your privacy seriously. We are fully aware of the importance of your privacy and will do our best to protect the safety and reliability of your privacy. We are committed to maintaining your trust in us and abiding by the following principles to protect your privacy: consistency of rights and responsibilities, clear purpose, choice and consent, minimum necessity, ensuring security, subject participation, openness and transparency, etc. At the same time, we promise that we will only collect necessary information in accordance with the requirements of laws and regulations, and take corresponding security protection measures to protect your privacy. **Please read and understand this Privacy Policy carefully before using our products or services. If you do not agree to this Privacy Policy, please do not use the products or services.**

This policy will help you understand the following:

- 1. How we collect and use your information**
- 2. How we share, transfer and publicly disclose your information**
- 3. How we protect your information**
- 4. Your rights**
- 5. How we protect children’s information**
- 6. Storage location, period, and transfer of privacy**
- 7. Changes to this policy**
- 8. How to contact us**

1. How we collect and use your information

When you do not use the cloud service, we will not collect any of your information.

When you use the cloud service, you need to register a glinet account and password separately, and we will collect the following information from you:

- 1.1 We will collect your login account information, IP address, as well as the association information between glinet account and smart devices. These pieces of information will be used to provide you with networking services. The above information is listed in detail as follows:
 - Login account information: glinet account, nickname, avatar information;
 - Information collected during the networking process using routing devices: router MAC address, IP address, device name, device model, and device firmware version;
 - After networking, use the information collected from the resource function under the shared router: the IP and MAC default names of the devices connected to the router;
 - When you purchase cloud gateways, the network egress IP of the PC they are currently using will be collected.

- 1.2 In order for you to continue to enjoy the cloud service, we will use your cloud platform version and mobile phone model when upgrading the firmware to provide you with the cloud platform upgrade services. At the same time, we may collect the list and version of your connected smart devices to provide you with the upgraded functionality of your smart devices to ensure that you can use the latest version of the service (including the firmware version).
- 1.3 We may collect your feedback questions, phone number or email address, imported pictures or videos, and submitted problem logs. This information will be used to allow us to better understand the problems you encounter and contact you.
- 1.4 Information we collect through automated means
- When you use the cloud service, we collect data about the device you use to access the cloud platform, such as: device name; relevant operating system type; host name; IP address; encryption public key; language setting; date and time of access to the cloud platform; logs describing the connection, and statistics about data sent from other devices ("inter-node traffic logs"); however, please note that the cloud platform does not process or access the content of user traffic data transmitted through the cloud platform, which is fully end-to-end encrypted.
- You may choose to use certain features and functions through the cloud platform, which may generate additional logs and other data that will be sent to the cloud platform for processing and storage on behalf of our customers ("customer log data").
- When you use the cloud service, we also collect aggregated usage statistics (such as the amount of data transmitted through the cloud gateway over a period of time). Please note that to the extent that such aggregated information or the above metadata collected by us through your use of the cloud platform cannot be used to identify you or your device, we may use and disclose such information at our discretion, as described in the "Aggregate/De-Identified" Information section below.
- 1.5 When you use our Website, we automatically collect certain information about your device and how you use the Website, including your IP address, browser type, browser language, operating system, state or country from which you access the cloud service, software and hardware attributes (including device IDs), referring and exit pages and URLs, platform type, number of clicks, files you download, domain names, landing pages, pages viewed and the order of those pages, time spent on particular pages, the date and time you use the Service, error logs, and other similar information. Based on your IP address, we may be able to infer your approximate location (e.g., city/state or zip code).
- To collect Website Information, we and our service providers may use "cookies" or similar tools to track, measure and analyze the actions and usage patterns of our Website visitors. Cookies are small data files that can be stored on your browser and device so we can recognize you when you return. We use cookies for analytical purposes, to provide certain features of the Website, to help us understand how users interact with the Website, and to improve your experience of the Website. You can set your web browser to notify you when you receive a cookie and to accept or reject certain cookies. However, if you choose not to accept cookies, some features and areas of the Website may be limited. To learn how to manage your cookies, please follow the instructions for your specific browser or, if accessing this website through a mobile device, refer to the manufacturer's instructions.

1.6 Information We Collect from Others

From time to time, to the extent permitted by applicable law, we may collect information about prospects from other sources, including partners, data enhancement services, conferences and other industry events, or other purposes we explain to you at the time of collection. We use this information to supplement the information we collect directly from prospects to better understand our prospects' interests, provide them with more relevant information, and improve our analytics and advertising.

We may provide you with the opportunity to participate in or log in to the services using third-party social networking sites or other third-party applications. When you log in to the services through these third-party mechanisms, we may collect certain information related to your account on the third-party site (such as name, username or email address or profile picture) in accordance with your privacy settings on the third-party site to create and manage your account or as part of the operation of the third-party site, plug-in or application. The third party's privacy policy, not ours, will govern the information disclosed to us through the use of these login methods.

When you "like" or "follow" us on Facebook, Twitter, Instagram or other social media sites, we may collect some information from you, including your name, username, email address, and any comments or content you post related to us.

2. How we share, transfer and publicly disclose your privacy

2.1 Sharing

We will not share your information with any company, organization or individual outside our company unless we obtain your explicit consent.

2.2 Transfer

We will not transfer your privacy to any company, organization or individual, except in the following circumstances:

- a. Transfer with explicit consent: After obtaining your explicit consent, we will transfer your privacy to other parties;
- b. When a merger, acquisition, or bankruptcy liquidation is involved, if privacy is transferred, we will inform you of the name of the recipient, contact information, etc., and require the recipient to continue to be bound by this privacy protection policy, otherwise We will require the recipient to re-obtain your authorization and consent.

2.3 Public disclosure

We will only publicly disclose your privacy under the following circumstances:

- a. After obtaining your explicit consent;
- b. Disclosure based on law: We may publicly disclose your privacy when required by laws, legal procedures, lawsuits, or mandatory requirements from government authorities.

3. How we protect your privacy

We will take various precautions to protect your privacy to protect it from loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, or destruction. To ensure the security of your privacy, we will only use your privacy as permitted by laws and regulations and with your explicit consent. We have strict information security regulations and processes,

and have a dedicated information security team to strictly implement the above measures within the company. We will take reasonable and feasible measures to try our best to avoid collecting irrelevant privacy. If a security incident such as privacy leakage occurs, we will activate an emergency plan to prevent the security incident from expanding, and inform you in the form of push notifications, announcements, etc.

However, the Internet environment is not 100% safe. Although we have the above measures, please note that there are no "perfect security measures" on the Internet. We will try our best to ensure or guarantee the security of any information you send to us.

4. Your rights

In accordance with relevant laws, regulations, standards, and common practices in other countries and regions, we guarantee that you can exercise the following rights with respect to your privacy:

4.1 Access your privacy

You have the right to access your privacy, except for exceptions provided by laws and regulations. If you need to access your privacy, You can access your personal information in the Security Center

4.2 Change or delete your privacy

If you need to change your personal information (such as keys), you can change or delete it in the Security Center, or you can consult us for modification according to the contact information in Article 8 of this Agreement.

You can make a request to us to delete privacy under the following circumstances:

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

4.3 Scope of withdrawing your authorization and consent

If you want to withdraw the authorization of relevant permissions, you can turn off the corresponding permissions in the operating system of your hardware device itself or consult us according to the contact information in Article 8 of this Agreement to achieve the purpose of withdrawing authorization consent. However, specific business functions and services will require your information to be completed. When you withdraw your authorization, we will no longer collect and process your corresponding privacy, and we will not be able to provide you with unauthorized corresponding functions or services. However, your decision to withdraw your authorization will not affect the previous processing of privacy based on your authorization.

4.4 Personal account cancellation

If you need to cancel your personal account, you can contact us according to the contact information in Article 8 of this Agreement, which you can provide corresponding information and materials, and ensure that the information and materials provided are legal, authentic, and valid so that customer service can verify your identity and cancel your account. After canceling your account, we will stop providing products or services to you and delete your privacy according to your request, unless otherwise provided by laws and regulations.

4.5 Data Portability

If you need to transfer your personal information to a third party, you can contact us through the contact information in Article 8 of this Agreement, provide a written application or prove your identity in other ways to obtain your personal information, and transfer it to the third party yourself. In this case, you shall bear the responsibility for transferring your information to the third party, and check the privacy protection of the third party by yourself to ensure that it does not violate any legal provisions. We do not assume any responsibility for you carrying your data to a third party by yourself.

4.6 Response to your above request

If you need to contact us through the contact information in Article 8 to handle the above request, for safety, you may need to provide a written application or prove your identity in other ways. We may ask you to verify your identity before processing your request. We will respond within fifteen working days.

In principle, we do not charge fees for your reasonable requests, but for repeated requests that exceed reasonable limits, we will charge a certain cost depending on the circumstances. We may reject requests that are unreasonably repetitive, require excessive technical means (for example, require the development of new systems or fundamentally change existing practices), pose risks to the legitimate rights and interests of others, or are highly impractical.

We will not be able to respond to your request under the following circumstances:

- a. Relevant to the privacy controller's performance of obligations stipulated in 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. The privacy controller has sufficient evidence to show that the privacy subject has subjective malice or abused rights;
- f. To protect the life, property, and other major legitimate rights and interests of the privacy subject or other individuals but it is difficult to obtain the consent of the individual;
- g. Responding to the request of the privacy subject will cause serious damage to the legitimate rights and interests of the privacy subject or other individuals or organizations;

4.7 Complaints and reports

If you think your privacy rights may have been infringed or find clues that your privacy rights have been infringed, you can contact us according to the contact information in Article 8 of this Agreement, and we will give you feedback on your complaints and reports within fifteen working days after verification.

5. How we protect children's privacy

Our products, websites, and services are primarily intended for adults. Children should not create their own account without the consent of a parent or guardian. For cases where we collect information from children with parental consent, we will only use or publicly disclose

this information as permitted by law, with the explicit consent of the parent or guardian, or as necessary to protect the child.

Although local laws and customs may define children differently, we consider anyone under the age of 14 to be a child.

If we discover that we have collected information from children without first obtaining verifiable parental consent, we will seek to delete the data as quickly as possible.

6. Storage location, period, and transfer of privacy

6.1 Where information is stored

We comply with laws and regulations and store your personal information in your country/region.

6.2 Duration of storage of information

Generally speaking, we only retain your information for the minimum period necessary to fulfill the purpose. However, under the following circumstances, we may change the storage time of privacy in order to comply with legal requirements:

- a. To comply with applicable laws, regulations, and other relevant provisions;
- b. To comply with court judgments, rulings, or other legal procedures;
- c. To comply with the requirements of relevant government agencies or legally authorized organizations;
- d. We have reason to believe that we need to comply with laws, regulations, and other relevant requirements;
- e. Reasonably necessary purposes to implement relevant service agreements or this agreement, safeguard social and public interests, and protect the personal and property safety or other legitimate rights and interests of our customers, us or our affiliates, other users, or employees.
- f. When our products or services cease operations, we will notify you through push notifications, announcements, etc., and delete or anonymize your information within a reasonable period.

6.3 Transfer of stored information

Unless we obtain your explicit consent or other legal provisions, we will not transfer your personal information to other companies, organizations or individuals without authorization.

7. Changes to this policy

We may update and revise the content of this Policy from time to time.

We will post any changes to this policy on this page. For major changes, we will also provide more prominent notices (including for some services, we will send notices through more prominent means such as page pop-ups to explain the specific changes in the privacy policy).

Major changes referred to in this policy include but are not limited to:

- a. Our service model has undergone major changes. Such as the purpose of processing privacy, the type of privacy processed, the use of privacy, etc.;
- b. We have undergone major changes in ownership structure, organizational structure, and other aspects. Such as changes in owners caused by business adjustments, bankruptcy mergers, etc.;

- c. The main objects to whom privacy is shared, transferred, or publicly disclosed change;
- d. Significant changes in your rights to participate in the processing of privacy and how you exercise them;
- e. When our contact information and complaint channels change.

8. How to contact us

If you have any questions, comments, or suggestions, you can contact us at any time:

Contact information: support@gl-inet.com

Contact address: Unit 601, Building 5W, Hong Kong Science Park, Shatin, N.T., Hong Kong