

Grabtalk Privacy Policy

Last update on August 4, 2015

Grabtalk, Inc. (“Grabtalk,” “we,” “our,” or “us”) is committed to respecting and protecting your privacy. This Privacy Policy discloses to the privacy practices for Grabtalk, Inc., www.grabtalk.cn, www.grabtalk.com, Grabtalk WeChat Platform and the Grabtalk applications (the “Apps”), and describes our practices regarding the personal information (the “Personal Information”) we collect from our users. Using our service (the “Service”) shall indicate your acknowledgement and agreement of this Privacy Policy and our Terms of Use. By using our Service, you consent to the collection, use and storage of your information by us in the manner described in this Privacy Policy.

1. Information We Collect

We collect information from our users, as described below.

a. Information You Provide to Us

We may collect Personal Information you make available to us when you interact with us, such as when you open an account, or use our WeChat Service or Apps. The Personal Information we collect may include your name, phone number, e-mail, residential address, passport number, and any other information necessary to fulfill your request. Use of our Service and/or Apps may also require you to provide your account credentials, including user name and password.

b. Information Collected from Third Parties

To better understand our users, we may contact with third-party service providers and collect information about you, such as your name, phone number, and residential address, from third party services that are applied to fulfil your requests so that we can offer better platform experiences and tools in the future. We may also collect, store and use shared Information that others using our Service make available about you, such as information contained in posts they make and communications they make to you and others using our Service.

c. Location Data

By offering Service, we may collect certain location data and log data you or your devices provide to us. We may use cookies, web beacons and log files to collect, and store Information about you or relating to you. Location Data includes information that we collect regarding your location from your device (such as from GPS, WiFi, compass, accelerometer or other sensors), the IP address from WeChat Location or internet service you use to access our Service, other

information made available by you or others that gives an indication as to where you are or have been located.

2. Use of Your Information

a. Purposes of Use

In general, we use your Personal Information you submit to us to respond to the requests that you make, or to aid us in serving you better. We may use your Information for any of the following purposes:

- i) To identify you as a user in our system;
- ii) To provide our standard Service, security, fraud-detection, archival and backup purposes in connection with the provision of our Service;
- iii) To improve the quality of experience when you interact with our Apps and Service;
- iv) To improve our Service and to respond to customer desires and preferences, including language and location customization, personalized help and instructions, or other responses to your and other customers' usage of our Service;
- v) To help us develop our new Service and improve our existing Service;
- vi) To provide you with advertising and direct marketing activities on or in connection with our Service when your account is subscribed to an official account;
- vii) To allow you to participate in surveys about our products and Service.
- viii) To send you administrative notifications, such as security or support and maintenance advisories;

b. Period of Use

Subject to applicable laws and regulations, you may have the right to request to receive a copy of and make any corrections to your Personal Information which we hold, and to request that we deactivate and not use any of your Personal Information that is stored by us. You may direct such request to our Privacy officer, or where we offer this option in our Service, you may also log into your account with us and make the appropriate changes. We will respond to all requests made to our Privacy officer within 60 days.

Should your account be terminated by you or us for any reason, we will (subject to the above paragraph) take steps to ensure that your Personal Information is no longer available through our Service, or otherwise used by us, within a reasonable period of time (subject to technical limitations) after such account

termination. However, it is important to note that communications made by you using our Service may put your Personal Information in the hands of third parties that we cannot control.

c. Transfer, Storage and Security of Your Personal Information

We operate and may continue to operate servers in a number of jurisdictions around the world, so the server on which your Personal Information is used and stored may not be in your jurisdiction. You consent to the transfer of your Personal Information (both inside and outside of your jurisdiction) for the purposes described in this Privacy Policy. We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Please be aware that despite our efforts, no data security measures can guarantee 100% security at all times. Our systems and the communications networks through which you access our Service may be subject to security breaches and failures which are due to circumstances beyond our reasonable control. If you have any questions regarding the security of your Personal Information, please contact our Privacy officer.

3. Sharing of Your Personal Information

a. Security

Other than as permitted under this Privacy Policy or as otherwise consented by you, we will not transfer your Personal Information to any other third parties for their processing for any purposes. We will use reasonable efforts to ensure that such third parties only use your Personal Information in compliance with this Privacy Policy and are subject to any other instructions we give them, including any appropriate confidentiality and security measures that we implement. We allow third parties such as analytics providers and advertising partners to collect your Personal Information over time and across different websites or online Service when you use our Service.

We are committed to protecting the security of your Personal Information. We use a variety of industry-standard security technologies and procedures to help protect your Personal Information from unauthorized access, use, or disclosure. We also require you to enter a password to access your account information on the Apps. For your information security please do not disclose your account password to unauthorized people.

b. Purposes of Sharing

We and our affiliate companies may share your Personal Information within our group of companies and with joint venture partners and third party service providers, contractors and agents (such as communication service providers who send emails or push notifications on our behalf, and mapping services providers who assists us and you with location data), in each case, for the purposes of:

- i) providing our Service to you;
- ii) assisting us in carrying out the purposes set out under the “Use of Your Information” section above;
- iii) carrying out our obligations and enforcing our rights under the Grabtalk Terms of Service or this Privacy Policy;
- iv) helping understand and improve our Service.

c. Corporate Restructuring

We may share some or all of your Personal Information in connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Information collected by us and will assume the rights and obligations regarding your Personal Information as described in this Privacy Policy.

4. Your Choices Regarding Your Information

a. Newsletters and Other Types of Communications

When you use our Service, we may use your Information to send you emails, newsletters or push notifications to your device. If you no longer wish to receive these communications, you can do so by following the unsubscribe instructions in the emails we send to you, opting out of notifications at the device level (if available) or contacting our Privacy Officer via the contact information within this Policy.

b. Service-related announcements

We may from time to time send you service-related announcements when we consider it necessary to do so (such as when we temporarily suspend one of our Service for maintenance). You may not opt-out of these service-related announcements, which are not promotional in nature.

c. Modifying or Deleting Your Information

If you have any questions about reviewing, modifying or deleting your information, you can contact directly through our WeChat Platform, or by editing your profile via the Website or App or by emailing us at service@grabtalk.cn. If you completely delete all of your Personal Information, your user account may become deactivated. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes.

5. Age Restrictions

Children under the age of 13 are not allowed to use our Service. We do not knowingly collect or solicit Personal Information from any children under the age of 13 or knowingly allow such persons to register as Users. Please contact our Privacy officer if you believe we have any Personal Information from any children under the age of 13 and we will promptly investigate (and remove) such information.

6. Changes to this Policy

We reserve the right to make changes to this Privacy Policy from time to time. If this Privacy Policy changes in any way, we will place an updated version on this page, notify you by revising the date at the top of the Policy, and in some cases, we may provide you with additional notice (such as adding a statement to our websites' homepages or sending you a notification).