

## **Privacy Policy**

Last Updated: [2024/6/21]

Bestway (Hong Kong) International Ltd. and its affiliated companies within the BESTWAY Group (hereinafter refer to as “BESTWAY”, “we”, “our” or “us”) take your privacy very seriously. This Privacy Policy is designed with your needs in mind, and it is important that you have a comprehensive understanding of our personal information collection and usage practices, while ensuring that ultimately, you have control of your personal information provided to BESTWAY.

This Privacy Policy explains how BESTWAY collects, uses, discloses, processes and protects any personal information that you give us or that we collect from you. Should we ask you to provide certain information by which you can be identified when you use the services on our platform, it will only be used in accordance with this Privacy Policy and/or our terms and conditions for users. Under this Privacy Policy, “personal information” means information that can be used to directly or indirectly identify an individual, either from that information alone or from that information combined with other information BESTWAY has access to about that individual, except as otherwise specifically provided by applicable laws in your region. We will use your personal information strictly in accordance with this Privacy Policy.

### **1. What Information Do We Collect**

Information you provide to us or upload: We may collect personal information you provide to us, such as your name, cell phone number, email address, BESTWAY App account information (e.g. your security-related information, name, birthday, gender), information or data synchronized with the devices you may access to BESTWAY (Such as images captured by your system album or device), and the account and related settings information created at BESTWAY, the devices you add or messages you send, the Feedback, etc.

Terminal or SIM card related information: We may collect information related to the terminal running BESTWAY Apps, such as IMEI, system version, device manufacturer information, device brand, model name, network operator and application information in the device. We may also collect information about the device tied to your account, such as MAC address, DID, device network status (IP/network signal/network connection status/other device network environment information), firmware version, device identifier and Bluetooth device list.

Information we specify about you: We may collect and use information such as your account number.

Location information (for specific services/features only): Various types of information related to your location, such as area and country codes, city codes, mobile network

codes, mobile device country codes, cell identifiers, area names, time zone settings, and language settings.

**Login information:** Information related to your use of certain features, mobile applications and websites, such as cookies and other anonymous identifier technologies, IP addresses, network request information, temporary message history, standard system logs and system crash information.

**Account credentials:** Information about your account credentials, such as passwords, password security questions and answers, etc.

## **2. How We Use Your Information**

**Creating your BESTWAY account.** Personal information collected when creating an account through the web or our mobile devices is used to create the user's personal account and profile page.

**Provide location-based services.** When using BESTWAY and smart terminals that access BESTWAY, we may use location information to determine the time zone of the device to ensure that the time and login service area are accurately displayed in the device. As well as the experience of turning on the corresponding device for you in advance according to your choice. You can turn off this feature at any time by going to the device settings or stop using this application.

**Device access.** Devices operating through the App need to verify their device authenticity, so we will need to verify the legitimate identity of the device by verifying the factory MAC and DID information. In addition, if the device needs to be connected to the network, you need to set up the device through the App, and this process requires you to enter the corresponding Wi-Fi name and password, which is only used for the device to match the network. The Wi-Fi and password data you fill in will be encrypted and stored locally on the device and will not be uploaded to the server, so you can enter the device at any time to delete the information. At the same time, we need to choose the optimal networking method for the device by judging the IP and network signal to ensure the stability of the device's networking.

**Device status display.** It allows you to view the device status remotely so that you can always check the device operation.

**Set automation tasks.** The event information reported by your device (the information comes from the device you added, the specific settable information depends on the scope of your privacy authorization for the device, each added device will provide the terms of the device provider's privacy policy for you to choose whether to agree) can be used to create your own personal automation tasks.

**Push services.** The account number and IMEI number will also be used to provide

BESTWAY push services to send device notifications to users. You can turn this feature off at any time by changing the preferences.

Collect user feedback. The feedback you choose to provide is invaluable in helping BESTWAY improve our services. In order to track the feedback you choose to provide, BESTWAY may use the personal information you provide to contact you and keep a record of it.

Sending Notifications. From time to time, we may use your personal information to send important notifications, such as notifications about abnormal device performance, push notifications for devices you have customized (depending on your purchase of the added device), and changes to our terms, conditions, and policies.

### **3. Securing and Retention Your Information**

**Security.** We have implemented commercially reasonable administrative, technical, and physical security controls that are designed to safeguard personal information. We have a team dedicated to keeping your information secure and testing for vulnerabilities. We also conduct periodic reviews and assessments of the effectiveness of our security controls.

Notwithstanding the above, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, BESTWAY cannot guarantee that your personal information is under absolute security with the existing security technology. If you have any questions about the security of the App, please contact us.

**Retention.** Generally, we store your information on BESTWAY's servers which is established upon third-party servers until you delete or edit it, or for as long as we need it to support your use of our App, unless a longer retention period is required or permitted by applicable law.

### **4. Who We Share Your Personal Information with**

We may share your personal information with subsidiaries of BESTWAY INFLATABLE & MATERIALS CORP. headquartered at No. 208 Jinyuanwu Road, Shanghai, China and BESTWAY (HONG KONG) INTERNATIONAL LTD at Suite 713, 7 Floor, East Wing, Tsim Sha Tsui Center, 66Mody Road, Kowloon, Hong Kong. We may need to share your information with selected third parties that provide services to us or act on our behalf in connection with the operation of our business. We require all third party service providers to respect the privacy and security of your personal information and to treat it in accordance with the law. We do not permit our third party service providers to use your personal information for their own purposes and only permit them to process your information for specified purposes and in accordance with our instructions.

In particular, your information may be disclosed to the following categories of recipients:

- Professional advisers (e.g. IT, legal and financial advisers) and auditors.
- IT and system providers; website development and data storage providers; web and data analytic companies.
- Ecommerce platform and service providers operating and managing our online store on our behalf; card and online payment processing service providers.
- Digital, mobile and social media marketing agencies; mail and email deployment agencies; tour booking agencies; customer fulfillment agencies; event and competition organizers and photographers.
- Non-personally identifiable data such as hashed email address, IP addresses, cookie IDs and device IDs may be shared with identity resolution service & data onboarding service providers; online and social media retargeting and remarketing advertisers.
- Logistics, distribution and delivery service providers; manufacturing plants for personalized products.
- Fraud prevention and credit reference agencies; litigation and recovery specialists to recover any non-payment or debt owed to us.
- Building reception and security for distillery tours.
- Trade associates, business partners and third parties with whom we may enter into negotiations with in respect of a commercial agreement, e.g. joint business venture.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.
- Law enforcement agencies; financial regulators and other relevant regulatory authorities; government bodies; tax authorities; courts tribunals and complaints/dispute resolution bodies in circumstances where we are required to disclose personal information by law.

Although we are not able to provide you with a list of all our services providers in this Privacy Notice, if you would like further information, you may contact us at [privacy@bestwaycorp.com](mailto:privacy@bestwaycorp.com).

## **5. Your Rights**

You may update, correct, or delete certain BESTWAY account information and preferences by accessing your account preferences page, available through certain BESTWAY Products and Services.

Note, however, that if you exercise your right to object or your rights of blocking, deletion or to be “forgotten” or if you decline to share certain information with us, or if you withdraw your consent to our processing of information about you, we may not be able to provide to you some, or any, of the features and functionality of BESTWAY products and services.

Likewise, if you close your BESTWAY account, you will not be able to sign in to BESTWAY products and services or access any of your information. However, you can open a new account at any time. Please note that while any changes you make will be reflected in active user databases within a reasonable period of time, we may retain all information you submit, as authorized under applicable law, for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

If you wish to exercise any rights you have under applicable data protection law, including the right to access, amend or delete any information we hold about you, you may contact us at [privacy@bestwaycorp.com](mailto:privacy@bestwaycorp.com).

## **6. Children's Privacy**

Except for certain products that are marked as “14+” or “for customers over the age of 14”, BESTWAY Products and Services are not directed to children under the age of 16. We do not knowingly collect information from children under the age of 16 without obtaining parental consent.

## **7. Country or State-Specific Privacy Rights**

The law in some countries or states may provide you with additional rights regarding our use of personal information. To learn more about any additional rights that may be applicable to you as a resident of one of these countries or states, please see the privacy addendum for your country or state that is attached to this Privacy Policy.

### **7.1. Your GDPR Rights**

You may have the additional rights described in the European Union / United Kingdom

Privacy Addendum when we collect, process, or store information in the European Union / United Kingdom.

### **7.2. Your California Privacy Rights**

As of January 1, 2020, you may have the additional rights described in the California Addendum if you are a California resident.

## **8. Change to Privacy Policy**

We may modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you prior to the update's effective date by posting the notification on the App.

## **9. Contact Us**

Please get in touch if you have any questions about how we use your information, or if you wish to contact us about your legal rights or if you have any complaints or feedback about our use of your information. Please contact us at any time by sending an email to us at [privacy@bestwaycorp.com](mailto:privacy@bestwaycorp.com).

## **BESTWAY's European Union / United Kingdom Privacy Addendum**

Date last updated: [2024/6/21]

This European Union / United Kingdom Privacy Addendum (the "EU/UK Addendum") supplements the information contained in BESTWAY's Privacy Policy (the "Privacy Policy") and applies to you solely in the following circumstances ("consumers" or "you"):

- you are in the European Union or the United Kingdom; or
- you access the website of a BESTWAY subsidiary that operates in the European Union or the United Kingdom, regardless of where you are located in the world.

We adopt the EU/UK Addendum to comply with (1) General Data Protection Regulation (EU) 2016/679 ("GDPR"), (2) the UK General Data Protection Regulation ("UK GDPR"), and (3) the Data Protection Act 2018, and, unless defined in this EU/UK Addendum or the Privacy Policy, any terms defined in GDPR have the same meaning when used in this EU/UK Addendum.

### **1. Data controller**

Bestway Europe Srl is the data controller in respect of the personal data which we hold about you. As a data controller, we are responsible for determining the purposes for which we use the information we hold about you.

### **2. Which countries will your personal data be sent to?**

As BESTWAY is an international enterprise, there may be instances where it may be necessary for us to transfer your information outside the European Union or United Kingdom, e.g. to our headquarters and various subsidiaries, or if we use third party service providers from another country. In these circumstances, we will put in place suitable safeguards, for example an intra-group data transfer agreement or standard contractual clauses to ensure that your information is processed securely and in accordance with this Privacy Policy and applicable regulations. If you require further information about the safeguards we put in place, you can request such information by contacting us by email at [\[privacy@bestwaycorp.eu\]](mailto:privacy@bestwaycorp.eu)[\[HY1\]](#).

### **3. What rights do you have and how can you exercise them?**

Pursuant to the General Data Protection Regulation or equivalent local legislation, you

may have the following rights:

- **Subject access right** – You can ask us to provide you with a copy of the personal data that we hold about you and a description of how we use your information.

- **Right to rectification** – If you believe any information we hold about you may be inaccurate or incomplete, you can ask us to rectify these inaccuracies.

- **Right to erasure / right to be forgotten** – You can ask us to erase your information in certain circumstances:

- o the personal data is no longer necessary in relation to the purposes for which it was collected and processed;

- o our legal grounds for processing is consent, you withdraw consent and we have no other lawful basis for the processing;

- o our legal grounds for processing is that the processing is necessary for legitimate interests pursued by us or a third party, you object to our processing and we do not have overriding legitimate grounds;

- o you object to our processing for direct marketing purposes;

- o your personal data has been unlawfully processed; or

- o your personal data must be erased to comply with a legal obligation to which we are subject.

However, please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Right to data portability** – Where we process your information using automated means of processing based on your consent or for the purposes of performing a contract with you, you can ask us to supply such information to another party in a machine-readable format.

- **Right to restriction of processing** – You can ask us to restrict or suspend our processing of your information in certain limited circumstances:

- o for a period enabling us to verify the accuracy of your personal data where you have contested the accuracy of the personal data;

- o your personal data has been unlawfully processed and you request restriction of processing instead of deletion;

- o your personal data is no longer necessary in relation to the purposes for which it was collected and processed but the personal data is required by you to establish, exercise or defend legal claims; or

- o for a period enabling us to verify whether the legitimate grounds relied on by us override your interests where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us.

- **Right to object to processing** – Where we process your information on the lawful basis of our legitimate interests, you have the right to object to us processing your information in certain circumstances:

- o our legal grounds for processing is that the processing is necessary for a legitimate interest pursued by us or a third party; or

o our processing is for direct marketing purposes. If you object, your personal data will subsequently no longer be used for direct advertising purposes (objection pursuant to Art. 21 (2) EU GDPR and Art. 18 UK GDPR) but will be retained on a suppression list.

- **Right to withdraw consent** – If we process personal data based on your express consent, you have the right to withdraw this consent at any time. We do not generally process personal data based on express consent (as we can usually rely on another legal basis). However, please note that this will not affect the lawfulness of any processing of your information carried out before you withdraw your consent. The consents obtained are independent from each other; therefore, you can often revoke one, without affecting the others. Revoking your consent may mean that we are no longer able to provide you with the same services.

- **Right to lodge a complaint with a supervisory authority** - If you wish to submit a complaint or express any concerns about our use of your information, please contact us in the first instance. We will do our best to resolve your concerns to your satisfaction. However, if you feel that we have not addressed your concerns, please note that you have the right to make a complaint at any time to your local governmental or supervisory authority for data protection issues.

Data subjects in the European Union or the United Kingdom may exercise any of these rights, free of charge, by sending an email to [\[privacy@bestwaycorp.eu\]](mailto:privacy@bestwaycorp.eu)<sup>[HY2]</sup>. We will aim to respond to you within a month but this may be extended if the request is complex or we have received a number of requests from the same individual. If we have doubts about the identity of the requester, we may ask for more information to confirm your identity before responding to the request.

#### **4. Contact Information**

If you have any questions or comments about this EU/UK Addendum, the ways in which BESTWAY collects and uses your information described in this EU/UK Addendum or in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under GDPR, please do not hesitate to contact us at [\[privacy@bestwaycorp.eu\]](mailto:privacy@bestwaycorp.eu)<sup>[HY3]</sup>.

### **BESTWAY's California Privacy Addendum**

Date last updated: [2024/6/21]

If you are a California resident, this Privacy Policy Addendum for California Residents (“California Addendum”) applies to you. We have adopted this California Addendum to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California laws. The California Addendum supplements our standard privacy policy and prevails over any conflicting provisions in the standard privacy policy.

#### **1. Personal Information Collected**



BESTWAY collects, and may have collected the following categories of personal information from its consumers within the last twelve (12) months through its websites and through other means as described above in our Privacy Policy:

- Category A: Identifiers.
- Category B: Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category F: Internet or other similar network activity (\*limited to Websites).
- Category G: Geolocation Information

Personal information does not include publicly available information from government records, or deidentified or aggregated consumer information. We obtain the categories of personal information listed above from the categories of sources listed in our Privacy Policy.

## **2. Use of Personal Information**

We may use, sell, or disclose the personal information we collect for the business or commercial purposes described in our Privacy Policy. BESTWAY will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

## **3. Sharing Personal Information**

BESTWAY may disclose your personal information to a third party for a business or commercial purpose. When we disclose personal information for a business or commercial purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We share your personal information with the categories of third parties described in our Privacy Policy under “Who We Share Your Personal Information with”.

In the preceding twelve (12) months, BESTWAY has disclosed the following categories of personal information for the purposes described in our Privacy Policy:

- Category A: Identifiers.
- Category B: Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.

We disclose your personal information for a business purpose to the categories of third parties described in our Privacy Policy under “Who We Share Your Personal Information with”.

#### **4. Your Rights and Choices**

The CCPA provides consumers (California Residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

☐ Right of Disclosure: Upon verifiable written request, and within periods set by applicable law, we will provide you with information regarding the personal information we gathered about you over the past 12 months, the types of sources from which we obtain the information, the purposes for which the information is gathered, and the types of third parties with which we share or to whom (if any) we sell the information.

☐ Right of Access: Upon verifiable request, and within periods set by applicable law, we will grant you reasonable access to the personal information that we hold about you, provided that you establish to our reasonable satisfaction that you are the person whose personal information is requested. We may deny such access where the denial is permitted by applicable law and every request from an individual will be assessed on a case by case basis. In the event a request is denied, we will notify you in writing regarding the reasons for the denial. Consistent with how your Personal information is maintained in the ordinary course of our business, we will provide the information to you in an understandable form, and, to the extent feasible, in a format that permits you to use the information on other systems. We may impose a reasonable charge when a request is made (e.g., for photocopying or postage) to the extent permitted under applicable law.

☐ Right of Correction: We will take reasonable steps to permit you to correct or amend Personal information that is demonstrated to be inaccurate or incomplete.

☐ Right of Deletion: Upon verifiable request or when required or otherwise appropriate, we will delete Personal information we have gathered about you, except to the extent applicable law permits or requires us to maintain that information.

☐ Do Not Sell Information: BESTWAY does not sell your personal information to third parties for monetary consideration. We may, however, share personal information gathered by cookies and similar tools with third parties for marketing and other purposes, including analytics.

#### **5. Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless

permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

## **6. Contact Information**

If you have any questions or concerns regarding this California Addendum or our privacy practices, please contact us at:

[[privacy@bestwaycorp.us](mailto:privacy@bestwaycorp.us)]