

PRIVACY NOTICE

Applicable to the business operations carried out by Ccoin Finance Corporate Structure CO., LTD, a company registered under the laws of Lao at the Enterprise Code Number: 768281712-000 and having its headquarters at 1 Phon Kham Village, Sikottabong District, Vientiane

"CCOIN" or "we," "us," or "our" refers to by Ccoin Finance Corporate Structure CO., LTD, acting on behalf of its affiliates doing business as CCOIN or other brands owned by CCOIN. "You" or "your" refers to the person or entity that is the customer of record. Please read the following to learn more about our Privacy Notice ("this Notice"). This Notice applies to CCOIN websites, products, and services that display or provide links to this Notice.

This Notice describes how CCOIN processes your personal data, but it may not address all possible data processing scenarios. CCOIN may inform you of product - or service - specific data collection through supplementary policies or notices provided before collection.

This Notice describes:

- 1. How We Collect & Use Your Personal Data**
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- 4. How to Access & Control Your Personal Data**
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1. How We Collect & Use Your Personal Data

Personal data means any data that, either on its own or jointly with other data, can be used to identify a natural person. You directly provide us with such data when you use our websites, products, or services, or interact with us by, for example, creating a CCOIN account or contacting us for support. We may also obtain data by recording how you interact with our websites, products, or services. For example, we may use technologies like cookies or receive use data from software running on your device. As permitted by law, we may also obtain data from public and commercial third-party sources, for example, purchasing statistics from other companies to support our services. The personal data we collect includes name, gender, postal and email addresses, phone number, login information (account and password), etc., depending on how you interact with CCOIN, for example, the website you visit or the products and services that you use. We also collect the information you provide to us and the content of messages you send us, such as the query information you provide, or the questions or information you provide for customer service support.

Before using CCOIN's products or services, you may need to provide personal data. In some cases, you may be able to opt not to disclose your personal data to CCOIN. However, not providing CCOIN with certain data may mean that we cannot provide you with certain products or services or respond to an issue that you have raised.

We may use your personal data for the following purposes:

- Creating an account in order to benefit from our products, services and applications in more easily manner.
- Fulfilling your transaction or service requests, including fulfilling orders, payment processing, delivering, activating, or verifying products or services; providing training and certification; participating in onsite or virtual activities; fulfilling your requests for changes or providing you with the requested information (such as materials for products/services); and providing technical support.
- Contacting you with your consent; sending you marketing information about products and services that may interest you; inviting you to participate in CCOIN activities (including promotional activities). If you do not want to receive these types of information, you can opt out at any time.
- Sending you important notices, such as installation of and updates to operating system or applications as per ToU.
- Providing you with customized user experience and content, with your consent.
- Improving our products and services through internal audits, data analysis, and research in order to improve business operations.
- Analyzing the efficiency of business operations and evaluating market share for improving of business operations.
- Troubleshooting when you send us error reports for customer better experience.
- Synchronizing, sharing, and storing the data you upload or download and the data needed for the uploading and downloading for customer better experience.
- Ensuring the security of our products, services and customers or users, executing and improving our loss prevention and anti-fraud programs for security reasons.
- Complying with and enforcing applicable legal requirements, industry standards and our policies.

CCOIN may also collect and use non-personally identifiable information (Non-PII). Non-PII is information that cannot be used to identify a particular individual. For example, CCOIN will collect statistical data, such as the numbers of visits to its website. We collect this data to understand how users use our websites, products, and services so that we can improve our services and better satisfy your needs. CCOIN may collect, use, process, transfer, or disclose non-PII for other purposes at its own discretion.

We will endeavor to isolate your personal data from non-PII and ensure that the two types of data are used separately. If personal data is combined with non-PII, it will still be treated as personal data during processing.

CCOIN will process your personal data following the requirements of applicable laws on an appropriate legal basis, including:

- Processing your personal data to fulfill the contract when responding to a transaction or service request;
- Processing your personal data with your consent;
- Processing based on the legitimate interests of CCOIN or a third party when we use your personal data to contact you, conduct marketing or market surveys, improve our products and services, execute and improve our loss prevention and anti-fraud programs, and other purposes. Legitimate interests include enabling us to more effectively manage and operate our business and provide our products and services; protecting the security of our businesses, systems, products, services, and customers; internal management; complying with internal policies and processes; and other legitimate interests described in this Notice;
- Processing your personal data as necessary to comply with and fulfill legal obligations.

2. Cookies & Similar Technologies

2.1 Cookies

To ensure our website works correctly, we may at times place a small piece of data known as a cookie on your computer or mobile device. A cookie is a text file stored by a web server on a computer or mobile device. The content of a cookie can be retrieved or read only by the server that creates the cookie. The text in a cookie often consists of identifiers, site names, and some numbers and characters. Cookies are unique to the browsers or mobile applications you use, and enable websites to store data such as your preferences or items in your shopping cart.

Like many other websites or Internet service providers, CCOIN uses cookies to improve user experience. Session cookies are deleted after each visit, while persistent cookies remain in place across multiple visits. Cookies allow websites to remember your settings such as language, font size on your computer or mobile device, or other browser preferences. This means that a user does not need to reset preferences for every visit. On the contrary, if cookies are not used, websites will treat you as a new visitor every time you load a web page. For example, if you are redirected to another web page from a website you are already logged in to and then return to the original website, it will not recognize you and you must log in again.

CCOIN will not use cookies for any purposes not stated in this Notice. You can manage or delete cookies based on your own preferences. For details, visit [AboutCookies.org](https://www.aboutcookies.org). You can clear all the cookies stored on your computer, and most web browsers provide the option of blocking cookies. However, by doing so, you have to change the user settings every time you visit our website.

3. How We Disclose Personal Data

CCOIN shares your personal data with other partners, as described in this Notice, when services are provided by partners authorized by CCOIN. For example, when you make an online purchase from CCOIN, we must share your personal data with the logistics provider to arrange shipment or a partner to provide services. In addition, as an international company, we may share personal data with CCOIN affiliates, related-parties, partners and subsidiaries.

To comply with applicable laws or respond to valid legal procedures, CCOIN may also disclose your personal data to law enforcement or other government agencies. If CCOIN is involved in a restructuring, merger & acquisition, or a bankruptcy or liquidation lawsuit in a given jurisdiction, your

personal data may be disclosed in connection with the transaction. CCOIN may also disclose your data when appropriate, for example, to execute Terms of Use, when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or when it is in connection with an investigation of suspected or actual illegal activity.

4. How to Access & Control Your Personal Data

It is your responsibility to ensure that all personal data submitted to CCOIN is correct. CCOIN is dedicated to maintaining the accuracy and completeness of personal data and keeping the data up-to-date.

To the extent required by applicable law, you may (i) have the right to access certain personal data we maintain about you, (ii) request that we update or correct inaccuracies in that data, (iii) object or restrict to our use of your personal data, and (iv) ask us to delete your personal data from our database. To exercise these rights, please send an e-mail to support@strdome.com. Your written request may be required for security. We may decline the request if we have reasonable grounds to believe that the request is a fraudulent, unfeasible or may jeopardize the privacy of others.

If allowed by applicable laws, you have the right to withdraw your consent at any time when CCOIN processes your personal data based on your consent. However, withdrawal does not affect the legitimacy and effectiveness of how we process your personal data based on your consent before the withdrawal is made; nor does it affect any data processing based on another justification other than your consent.

If you think that the way we process your personal information does not comply with applicable data protection laws, you can contact the relevant competent data protection authority. You can obtain the information for contacting EU data protection authorities at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

5. How We Protect and Retain Your Personal Data

The security of your personal data is important to us. We use appropriate physical, management, and technical measures to protect your personal data from unauthorized access, disclosure, use, modification, damage, or loss. For example, we use cryptographic technologies for data confidentiality, protection mechanisms to prevent attacks, and access control mechanisms to permit only authorized access to your personal data. We also provide training on security and privacy protection for employees to raise their awareness of personal data protection. CCOIN is committed to protecting your personal data.

We will retain your personal information for no longer than is necessary for the purposes stated in this Notice, unless otherwise extending the retention period is required or permitted by law. The data storage period may vary with purpose, product, and service. The standards CCOIN uses to determine the retention period are as follows: the time required to retain personal data to fulfill business purposes, including providing products and services; maintaining corresponding transaction and business records; controlling and improving the performance and quality of products and services; ensuring the security of systems, products, and services; handling possible user queries or complaints and locating problems; whether the user agrees to a longer retention period; and whether the laws, contracts, and other equivalencies have special requirements for data retention; etc. We will maintain your registration information as long as your account is necessary for service provision. You can choose to deregister your account. After you deregister your account, we will stop providing you with products and services

through your account and delete your relevant personal data, provided that deletion is not otherwise stipulated by special legal requirements or needed for protection of interests of CCOIN.

6. How We Process Children's Personal Data

Our websites, products and services are primarily intended for adults. A child must not create a CCOIN account without the consent of a parent or guardian. If a child's personal data is collected with prior parental consent, we will only use or disclose the data as permitted by law, with the explicit consent of the child's parents or guardians, or when necessary for the protection of the child. If we accidentally collect a child's personal data without verified prior consent from the child's parents, we will attempt to delete the data as soon as possible.

You must be at least 16 years old. If you are considered a minor in your country, you must have your parent or legal guardian's permission to use CCOIN website, products and services.

7. Third-Party Providers and Their Services

To ensure a positive user experience, you may find content or web links from third parties other than CCOIN and its partners ("third parties"). CCOIN does not have the right to control such third parties, but you can choose whether to use the links, view the content and/or access the products or services provided by third parties.

CCOIN cannot control the privacy practices and data protection policies of third parties that are not subject to this Notice. When you submit personal information to such a third party, please read and refer to the privacy protection Notice of the third party.

8. International Transfers of Your Personal Data

As a global company, your personal data collected by CCOIN may be processed or accessed in the country/region where you use our products and services or in other countries/regions where CCOIN or its affiliates, subsidiaries, service providers or business partners have a presence. These jurisdictions may have different data protection laws. In such circumstances, CCOIN will take measures to ensure that data is processed as required by this Notice and applicable laws, which includes when transferring the data subject's personal data from the EU to a country or region which have been acknowledged by the EU commission as having an adequate level of data protection, we may use a variety of legal mechanisms, such as signing standard contractual clauses approved by the EU Commission, obtaining the consent to the cross-border transfer of a data subject in the EU, or implementing security measures like anonymizing personal data before cross-border data transfer.

9. Updates to This Notice

CCOIN reserves the right to update or change this Notice at any time. We will release the latest Privacy Notice on this page for any changes. If major changes are made to the Privacy Notice, we may notify you through different channels, for example, posting a notice on our website or sending you direct notification.

10. How to Contact Us

If you have any privacy complaints or issues, and want to contact CCOIN Data Protection Officer (DPO), please contact at support@strdome.com.

Where your personal data is processed by CCOIN in accordance with this Privacy Notice, the CCOIN entity that responds to your request, contacts you, provides you with products or services, or has signed or is about to sign a contract with you is the controller of the related personal data.