# **Finsdk Privacy Policy**

## **Introduction**

Welcome to the services provided by Finsdk! Finsdk deeply understands the importance of protecting users' privacy. This privacy policy is designed to explain to you the principles and measures we follow when collecting, using, storing, sharing, and protecting your personal information, ensuring that you can clearly understand how your personal information is processed while using our services. Please read this privacy policy carefully before using our services. By using our services, you indicate that you have read, understood, and agreed to the content of this privacy policy.

## **I. Definitions**

1. ****Personal Information****: Refers to various types of information recorded electronically or by other means that can identify the identity of a specific natural person either alone or in combination with other information, or reflect the activities of a specific natural person. This includes but is not limited to name, contact information, ID number, transaction records, etc.
2. ****Services****: Refers to the grid trading services provided by Finsdk to you through its platforms, applications, or other means, as well as related auxiliary services such as customer support and market analysis.
3. ****Users****: Refers to individual investors, asset management companies, financial institutions, and other individuals or entities that use Finsdk's services and access and utilize our services.

## **II. Information Collection**

1. ****Registration and Account Information****: When you register as our user, we will collect your name, email address, mobile phone number, created username, and password. This information is used to create and manage your account, ensuring that you can use our services normally.
2. ****Transaction - related Information****: During your use of the grid trading services, we will collect your trading instructions, transaction records (including transaction time, transaction amount, types of traded assets, etc.), and position information. This is to execute trading operations for you, provide trading reports, and conduct financial analysis.
3. ****Device and Network Information****: We will collect the device information you use when accessing our services, such as device model, operating system version, unique device identifiers (IMEI, MAC address, etc.), and your network connection information, such as IP address and network service provider. This is used to ensure the stability and security of our services and also helps us optimize service performance.
4. ****Location Information****: If the services you use require location - based specific functions (such as providing compliant services in accordance with local regulations), we may collect your approximate location information, such as the geographical location inferred from your IP address.

## **III. Information Use**

1. ****Service Provision****: We use the collected personal information to provide you with grid trading services, including executing trading instructions, managing your account, and providing trading statements and financial analysis to meet your investment needs.
2. ****Customer Support and Communication****: We use your contact information to communicate with you, answer your questions, provide technical support, and handle complaints and feedback, aiming to enhance your service experience.
3. ****Service Optimization and Improvement****: We analyze your usage behavior and transaction data to understand your needs and preferences, thereby optimizing our service functions, improving trading strategies, and designing user interfaces to provide you with more personalized and efficient services.
4. ****Risk Assessment and Management****: By analyzing your transaction information and personal data, we assess trading risks and take corresponding risk - control measures to ensure the security and stability of transactions and protect your asset safety.

## **IV. Information Sharing**

1. ****Affiliated Companies****: In necessary situations, we may share your personal information with our affiliated companies so that they can assist us in providing services, such as jointly conducting customer service and data analysis. However, we will ensure that affiliated companies adhere to privacy protection standards as strict as this privacy policy.
2. ****Third - Party Service Providers****: We cooperate with third - party service providers, such as payment processors, technology service providers, and data storage service providers. We may need to share your personal information with them during the service - providing process. For example, to complete a transaction payment, we will provide the necessary transaction information to the payment processor. But we will only share the necessary information and will sign strict confidentiality agreements with third - party service providers, requiring them to properly protect your personal information.
3. ****Legal Requirements and Protection of Rights and Interests****: In cases required by law, such as responding to court subpoenas or government investigations, we may disclose your personal information. In addition, when we believe that disclosing information is necessary to protect our legal rights and interests, prevent fraud, or other illegal activities, we may also share your personal information.

## **V. Information Protection**

1. ****Technical Measures****: We adopt a variety of security technical measures to protect your personal information, such as encryption technology, firewalls, and access control, to prevent information from being accessed, used, modified, or leaked without authorization. For example, we encrypt and store your transaction data to ensure its security during transmission and storage.
2. ****Management Measures****: We establish strict internal management systems to limit employees' access to your personal information. Only authorized employees can access and process your personal information. At the same time, we conduct privacy protection training for employees to enhance their privacy protection awareness and compliance awareness.
3. ****Data Backup and Recovery****: We regularly back up your personal information to prevent data loss. In case of data loss or damage, we can promptly recover the data to ensure that your services are not affected.

## **VI. Information Storage**

1. ****Storage Period****: We will store your personal information in accordance with the requirements of laws and regulations and for the period necessary to achieve the service objectives. Generally, we will store your personal information during your use of the services and for a certain reasonable period after the services end, for handling possible disputes and complying with legal regulations. For example, transaction records may be stored for several years to meet tax and audit requirements.
2. ****Storage Location****: Your personal information will be stored in data centers located within the United States. At the same time, we will take measures to ensure the security of data during cross - border transfers, in compliance with relevant laws and regulations.

## **VII. User Rights**

1. ****Right of Access****: You have the right to access the personal information we hold about you and understand how we process your personal information. You can obtain a copy of your personal information by logging into our platform or contacting our customer service team.
2. ****Right of Correction****: If you find that the personal information we hold about you is incorrect or inaccurate, you have the right to request us to correct it. You can submit a correction application through the account settings function on the platform or by contacting the customer service team.
3. ****Right of Deletion****: Under circumstances compliant with the law, you have the right to request us to delete your personal information. For example, if we no longer need your personal information to provide services, or if you withdraw your consent to our use of your personal information, you can submit a deletion request to us.
4. ****Right to Withdraw Consent****: If you previously consented to our collection, use, and sharing of your personal information, you have the right to withdraw your consent at any time. After withdrawing your consent, we will no longer process your personal information based on that consent, but this will not affect the legality of the processing activities we have carried out before you withdrew your consent.

## **VIII. Changes to the Privacy Policy**

1. ****Notification Method****: We may change this privacy policy due to business development, changes in laws and regulations, or other reasons. We will post change notifications in a prominent position on our website or notify you via email, in - app messages, etc.
2. ****Effective Time****: The changed privacy policy will take effect after a certain period from the date of publication or notification to you. The specific effective time will be clearly stated in the notification. Before the new privacy policy takes effect, we will process your personal information in accordance with the original privacy policy; after the new privacy policy takes effect, we will process your personal information in accordance with the new privacy policy.

## **IX. Contact Us**

1. ****Contact Information****: If you have any questions, comments, or suggestions regarding this privacy policy, or if you need to exercise your user rights, please contact us through the following channels:
Email: privacy@finsdk.com
Mailing Address: [Specific Address]
2. ****Processing Time Limit****: We will reply to and handle your inquiries or requests within a certain reasonable period (usually [X] business days) after receiving them, ensuring that your rights and interests are protected in a timely manner.

By reading and using our services, you confirm that you have fully understood and agreed to all the contents of this privacy policy. Finsdk will always be committed to protecting your privacy and providing you with safe and reliable financial services.