

PRIVACY POLICY

Last Updated: July 2026

INTRODUCTION

[Company Name] ("we", "our", "us") respects your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your Personal Data when you use the Platform. By using the Platform, you agree to the collection and use of information in accordance with this policy. This Privacy Policy consists of a main body applicable to all users globally, and jurisdiction-specific supplements that provide additional disclosures required by the laws of certain regions. Please refer to the supplement applicable to your jurisdiction for more detailed information.

1. INFORMATION WE COLLECT

English

1.1 Information You Provide

We collect information you voluntarily provide to us:

- **Account Information:** name, email address, username, password, and other registration details;
- **Profile Information:** company name, business address, phone number, job title, and other information you add to your profile;
- **Identity Verification Information:** government-issued identification, business registration documents, and other information required for identity verification;
- **Payment Information:** payment method details, billing address, and transaction history;
- **User Content:** any content you upload, post, or submit to the Platform;
- **Communications:** information you provide when contacting our support team or responding to surveys.

1.2 Information Collected Automatically

When you use the Platform, we automatically collect:

- **Device Information:** IP address, browser type and version, operating system, device type, unique device identifiers, and mobile network information;
- **Usage Information:** pages viewed, features used, time spent, clickstream data, and other interaction data;
- **Location Information:** approximate geographic location derived from your IP address (we do not collect precise geolocation without your explicit consent);
- **Cookies and Similar Technologies:** information about your browsing behavior and preferences through cookies, web beacons, and similar tracking technologies (see Section 3 below for more details).

1.3 Sensitive Personal Data

We do not intentionally collect sensitive personal data (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for unique identification, health data, or data concerning sex life or sexual orientation) unless you voluntarily provide it and we have obtained your explicit consent. If we collect sensitive personal data, we use it only for the purposes permitted by applicable law.

1.4 Sources of Personal Data (EEA/UK/Switzerland)

For users in the EEA, the United Kingdom, and Switzerland, we collect Personal Data from the following sources:

- **Directly from you:** Information you provide when registering, using our services, or communicating with us;
- **Automatically:** Information collected through cookies and similar technologies when you use our Platform;
- **From third parties:** Information we may receive from service providers (e.g., payment processors), business partners, or publicly available sources.

2. HOW WE USE YOUR INFORMATION

2.1 General Purposes

We use your information for the following purposes:

Purpose	Description
Providing and Managing Services	To create and manage your account, provide Platform services, process transactions, and fulfill contractual obligations.
Service Improvement	To improve, personalize, and enhance the Platform, including testing, research, analysis, and product development.
Communication	To send service updates, security alerts, technical notices, and respond to inquiries.
Security and Fraud Prevention	To ensure security and integrity, detect and prevent fraud, and debug to repair errors.
Legal Compliance	To comply with legal obligations, respond to law enforcement requests, and enforce agreements.

Marketing	To send promotional materials and information about products, services, offers, and events (only with consent where required).
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2.2 Legal Bases for Processing (EEA/UK/Switzerland)

For users in the EEA, the United Kingdom, and Switzerland, we process your Personal Data on the following legal bases under Article 6 of the GDPR:

Legal Basis	Description
Performance of a Contract	Necessary for the performance of a contract or to take pre-contractual steps (account creation, service delivery, payment processing).
Legitimate Interests	Necessary for our legitimate interests (improving services, security, fraud prevention, direct marketing) overriding no fundamental rights.
Legal Obligation	Necessary for compliance with legal obligations (e.g., tax and accounting record-keeping).
Consent	You have given explicit consent for specific processing purposes (e.g., third-party marketing).

3. COOKIES AND TRACKING

We use cookies and similar tracking technologies to:

- remember your preferences and settings;
- understand how you use the Platform;
- improve the Platform's functionality and performance;
- serve relevant advertisements (where applicable).

You can control cookies through your browser settings. However, disabling certain cookies may affect your ability to use some features of the Platform. For more detailed information about our use of cookies, please refer to our Cookie Policy [\[插入 Cookie 政策链接\]](#).

4. HOW WE SHARE YOUR INFORMATION

4.1 Categories of Recipients

We share your information with the following categories of recipients:

- **Service Providers:** Hosting, cloud infrastructure, payment processing, analytics, customer support, email delivery, and other service providers who process data on our behalf under strict contractual protections.
- **Affiliates:** Our affiliated companies for internal administrative purposes and integrated services.
- **Legal and Regulatory Authorities:** Where required by law, court order, or valid legal process, or to protect rights, safety, or property.
- **Professional Advisors:** Lawyers, accountants, auditors, and professional advisors.
- **Business Transfers:** In connection with a merger, acquisition, reorganization, or sale of assets. We will notify you before your Personal Data is transferred and becomes subject to a different privacy policy.
- **With Your Consent:** Third parties where you have given explicit consent.
- **Aggregated or Anonymized Data:** Non-identifiable aggregated data shared for analytics or research.

4.2 Recipients of Personal Data (EEA/UK/Switzerland)

For users in the EEA, the United Kingdom, and Switzerland, recipients listed above may be located outside the EEA, safeguarded as described in Section 5 below.

5. INTERNATIONAL DATA TRANSFERS

5.1 General

Your Personal Data may be transferred to, stored, and processed in countries outside your country of residence, including the United States, where data protection laws may differ.

5.2 Safeguards for EEA/UK/Switzerland Users

For users in the EEA, the United Kingdom, and Switzerland, we ensure appropriate safeguards for international data transfers:

- **EU-U.S. Data Privacy Framework (DPF), UK Extension, and Swiss-U.S. DPF:** Where applicable, we rely on certification under the DPF frameworks for transfers to participating organizations in the United States;
- **Standard Contractual Clauses (SCCs):** We use European Commission Standard Contractual Clauses for transfers to third countries without adequacy decisions;
- **Adequacy Decisions:** We rely on European Commission adequacy decisions where applicable;
- **UK Addendum & Swiss FADP:** We comply with the UK International Data Transfer Addendum and the Swiss Federal Act on Data Protection (FADP).

5.3 Data Transfers to the United States

Transfers to service providers in the United States are subject to the safeguards described above. We remain responsible for protecting your Personal Data in accordance with this Privacy

Policy.

6. DATA RETENTION

We retain your Personal Data only for as long as necessary to fulfill collection purposes, including providing Services, complying with legal obligations, resolving disputes, and establishing legal claims. Criteria include ongoing relationship length, legal obligations, and statutory limitation periods. Data is deleted or anonymized upon expiration of the retention period.

7. DATA SECURITY

We implement technical and organizational security measures (TLS/SSL encryption in transit and rest, access controls, vulnerability monitoring, incident response procedures). In the event of a data breach, we will notify you and relevant authorities as required by applicable law.

8. YOUR RIGHTS AND CHOICES

8.1 General Rights

All users may access, update, or delete account information, opt out of marketing communications, or disable cookies via browser settings.

8.2 Rights for EEA/UK/Switzerland Users

Under the GDPR, you have the Right to Access, Rectification, Erasure, Restriction, Data Portability, Object, Withdraw Consent, and Lodge a Complaint (see Section 14).

8.3 Rights for California Residents

Under CCPA/CPRA, you have the Right to Know, Delete, Correct, Opt-Out of Sale/Sharing, Limit SPI Use, and Non-Discrimination (see Section 15).

8.4 Rights for Residents of Other U.S. States

Comprehensive state privacy rights apply to residents of states like CO, CT, DE, IN, IA, KY, MD, MN, MT, NE, NH, NJ, OR, TN, TX, UT, VA (see Section 16).

8.5 How to Exercise Your Rights

Contact us via:

- **Email:**
- **Online Request Form:**
- **Postal Address:**

We respond within 30 days under GDPR and 45 days under US state laws. You may appeal our decision by emailing [插入联系邮箱] with "Privacy Request Appeal".

9. CHILDREN'S PRIVACY

The Platform is not intended for children under 16. We do not knowingly collect Personal Data from children.

10. THIRD-PARTY LINKS

This Privacy Policy does not apply to third-party services linked on our Platform.

11. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. When we make changes:

- We will post the updated Privacy Policy on this page and update the "Last Updated" date at the top;
- For material changes affecting how we collect or process your Personal Data, we will provide you with advance notice (e.g., via email or a prominent notification on the Platform) prior to the changes becoming effective;
- Where required by applicable laws, we will obtain your explicit consent before applying new terms to previously collected Personal Data.

12. GDPR SPECIFIC DISCLOSURES

- **Data Controller:**
- **DPO Contact:**
- **Automated Decision-Making:**

We do not engage in automated decision-making or profiling that produces legal or significant effects. AI tools are provided for technical reference only.

13. SUPPLEMENTAL EUROPEAN INFORMATION

Provides legal bases table for GDPR processing activities (Account, Delivery, Payment based on Contract; Analytics, Security based on Legitimate Interests; Marketing based on Consent). Supervisory Authorities contact: EU EDPB (<https://edpb.europa.eu>), UK ICO (<https://ico.org.uk>).

14. EUROPEAN PRIVACY RIGHTS

Comprehensive description of GDPR rights: Access (§14.2), Rectification (§14.3), Erasure (§14.4), Restriction (§14.5), Data Portability (§14.6), Objection (§14.7), Consent Withdrawal (§14.8), and Response timeframe within 1 month (§14.9).

15. CALIFORNIA PRIVACY RIGHTS

15.1 California Notice at Collection

Applies solely to California residents pursuant to CCPA/CPRA.

15.2 Categories of Personal Information Collected, Sold/Shared, and Retained

Category	Examples	Collected?	Sold or Shared?	Retention Period
A. Identifiers	Name, email address, IP address, account name	Yes	No	Duration of account lifecycle + 3 years
B. Customer Records	Name, address, phone number, payment details	Yes	No	Duration of contract + statutory retention
C. Protected Classifications	Age, gender (if voluntarily provided)	Yes	No	Retained until account termination
D. Commercial Info / 商业信息	Transaction history, purchase records	Yes	No	7 years for tax/financial compliance
E. Internet/Network Activity	Browsing history, interaction with Platform	Yes	Yes (via analytics/ads)	Up to 12 months
F. Geolocation Data	Approximate location from IP address	Yes	No	Active session duration
G. Sensory Data	Audio/visual (support call recordings)	Yes	No	90 days

H. Professional/ Employment	Job title, company name	Yes	No	Business relationship duration
I. Education Info	Education records	No	No	N/A
J. Inferences	Profiles derived from activity	Yes	Yes (for personalization)	Active account duration

15.4 Sale or Sharing of Personal Information & Opt-Out Preferences (GPC)

We do not sell Personal Information for monetary consideration. We process **Global Privacy Control (GPC)** preference signals automatically as valid opt-out requests.

15.6 Right to Limit Sensitive Personal Information

(Note: As we strictly limit Sensitive Personal Information use to CCPA-permitted business purposes, no opt-out link is required for Right to Limit).

CCPA 法定豁免商业目的。

16. SUPPLEMENTAL U.S. STATE LAW INFORMATION

Covers comprehensive privacy laws in US states (CO, CT, DE, IN, IA, KY, MD, MN, MT, NE, NH, NJ, OR, TN, TX, UT, VA). Users may opt-out of targeted advertising/sale via "Your Privacy Choices" or emailing [插入联系邮箱].

17. CONTACT US

- **Company Name:**
- **Address:**
- **Email :**
- **DPO Email:**