

# PayKka 隐私政策

## PayKka Privacy Policy

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亲爱的用户，PayKka（“我们”，“PayKka”）作为面向全球的金融科技产品及服务提供商所推出的综合金融服务平台。我们在中国香港、美国和卢森堡分别设立了本地机构：依次为 XGD Fintech Limited, Nexgo Inc, 以及 XGD Europe S.A.。

Dear user, PayKka ("we," "PayKka") is a comprehensive financial services platform launched by a global financial technology product and service provider. We have established local entities, XGD Fintech Limited, Nexgo Inc, and XGD Europe S.A. in Hong Kong, the United States, and Luxembourg respectively.

请您在使用 PayKka 的产品或者服务前，仔细阅读并了解我们的隐私政策，并充分了解我们是如何收集、处理、保留以及共享的您的（个人）数据。我们的隐私政策适用于所有访问 PayKka 网站的访客（即使您未成为我们的客户）、注册并继续使用 PayKka 服务的个人和实体，以及以其他形式与我们联系的任何其他个人和实体。

Before using PayKka's products or services, please carefully go through and understand our Privacy Policy and how we collect, process, retain, and share your (personal) data. Our Privacy Policy applies to all visitors to the PayKka website (even if you are not our customer), individuals and entities who register and continue to use PayKka services, and any other individuals and entities who contact us in other forms.

通过完整阅读以下内容，你将同意我们收集、处理和传输你的个人资讯。

By reading the following content in full, you will agree to us collecting, processing, and transmitting your personal data.

### 1. PayKka 的隐私政策概述 Overview of PayKka's Privacy Policy

PayKka 是一个非常注重安全、透明度和诚信的平台，我们深知保护和尊重您个人数据的重要性。为了能为目标企业客户提供优质的服务，我们需要了解一些与您企业和企业关联人的情况。我们只会收集提供相关产品或服务所必要的信息，并且会审慎地处理您的数据。我们会严格按照法律法规的要求，最大程度保护关于您的信息，以最大程度地减少滥用的风险，包括未经授权访问或泄露您的个人数据的风险。PayKka 致力于维持

您对我们的信任，将恪守以下原则，保护您的个人数据：权责一致原则、目的明确原则、选择同意原则、最小必要原则、确保安全原则、主体参与原则、公开透明原则等。同时，PayKka 将按业界成熟的安全标准，采取相应的安全保护措施来保护您的个人数据。

PayKka is a platform that places high importance on safety, transparency, and integrity. We deeply understand the significance of protecting and respecting your personal data. In order to provide quality services to our target corporate clients, we need to understand some status related to your company and the associated persons. We will only collect necessary information required to provide relevant products or services and will handle your data with great care. We will strictly adhere to legal requirements to the maximum extent possible to protect information about you, minimizing the risk of misuse, including unauthorized access or disclosure of your personal data. PayKka is committed to maintaining your trust in us, abiding by the following principles to protect your personal data: the principle of consistency of rights and responsibilities, the principle of clear purpose, the principle of choice and consent, the principle of minimum necessity, the principle of security assurance, the principle of subject involvement, the principle of openness and transparency, and others. Furthermore, PayKka will adopt corresponding security protection measures to safeguard your personal data according to mature security standards in the industry.

在本隐私政策中，“个人数据”指代可以直接识别您个人身份的数据，例如您的姓名或地址，或者可以与其他数据相关联以识别您的数据，例如联系信息与客户 ID。您应当完整阅读我们的隐私政策，以及我们的其他条款和相关文件。通过访问我们的网站、使用我们的服务和/或向我们提供信息，即表示您已经充分、完全地阅读并理解了本政策中的全部内容，并且同意我们按照隐私政策所述的方式收集、使用、存储和披露您的个人数据，以便您享受优质、便捷的服务，同时更好地保护您的账户及资金安全。

In this Privacy Policy, "personal data" refers to data that can directly identify your personal identity, such as your name or address, or data that can be associated with other data to identify you, such as contact information and customer IDs. It's important for you to read our Privacy Policy thoroughly, along with our other terms and related documents. By accessing our website, using our services, and/or providing information to us, it means that you have completely and fully read and understood all the contents in this policy, and you agree to us collecting, using, storing, and disclosing your personal data in the manner described in the Privacy Policy. This is to ensure that you enjoy high-quality and convenient services, while better protecting the security of your account and funds.

为给您提供更好的服务以及随着我们业务的发展，本隐私政策也会随之更新。我们会在

网站上发布修订版本并提前 30 天通知生效日期，请您留意查阅。如果通知期内您未向我们发送书面通知终止本协议，则我们将认为您已接受拟议的修改，并且同意我们按照最新的隐私政策收集、使用、保存和共享您的个人数据。如果不同意或对我们的隐私政策有任何疑问或需要进一步的帮助，请随时与我们联系。除非隐私政策中特别约定，服务条款中定义的术语和指称将同样适用于本隐私政策。我们非常重视您个人数据的安全和保护，因此请您放心，我们会竭尽全力保护和您的数据安全。

To provide you with better services and to keep up with the development of our business, this Privacy Policy will be updated accordingly. We will publish the revised version on our website and notify you 30 days in advance of the effective date. Please pay attention and check it out. If you do not send us written notice to terminate this Agreement within the notice period, we will deem you to have accepted the proposed modifications. Please note that once you confirm, it means you consent to us collecting, using, storing, and sharing your personal data in accordance with the latest Privacy Policy. If you disagree or have any questions about our Privacy Policy or need further assistance, feel free to contact us anytime. Unless otherwise specified in the Privacy Policy, the terms and references defined in the Terms of Service will also apply to this Privacy Policy. We take the security and protection of your personal data very seriously, so please rest assured that we will do our utmost to protect and maintain the security of your data.

## 2. 谁收集您的数据？ Who collects your data?

根据本政策，您的个人信息保护将由具体负责处理数据的控制者负责，基于您的国籍和主要办公地，可能与 PayKka 签订相关产品或者服务协议时的主体有所不同。我们的服务器是分布在中国香港、美国和卢森堡大公国的亚马逊云托管的数据中心。有时候，为了支持服务的运行，我们可能需要从其他地方访问这些服务器。想要了解详细的个人信息数据控制者，请见下方：

According to this policy, the protection of your personal data will be the responsibility of the controller specifically responsible for processing the data. Based on your nationality and place of business, the subject when signing the relevant product or service agreement with PayKka may be different. Our servers are distributed in data centers hosted by Amazon Cloud in Hong Kong, the United States and the Grand Duchy of Luxembourg. Sometimes, in order to support the operation of the service, we may need to access these servers from other places. For detailed information on the data controller of personal data, please see below:

您的居住国家/地区 Your Country of Residence	您的数据控制者 Your Data Controller	数据控制者所在地 Location of Data	数据控制者地址 Data Controller Address
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		Controller	
中国香港、中国大陆 Hong Kong, Mainland China	XGD FinTech Limited	中国香港 Hong Kong	Room17, 11/F, Tuen Mun Central Square, 22 Hoi Wing Road, Tuen Mun, Nt, Hong Kong S.A.R
美国 U.S.A.	Nexgo Inc.	美国加州 California, USA	23601 Ridge Route, Dr. Ste B, Laguna Hills, CA 92353-1527, USA
欧盟成员国 EU member states	XGD Europe S.A.	卢森堡大公国 Luxembourg	4, Rue Henri M. Schnadt, 2530 Luxembourg, Luxembourg

\*数据控制者的定义为单独或与他人共同确定个人数据处理目的和方法的法人、公共机关、机构或其他团体。

Data controller is defined as the legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

### 3. PayKka 收集哪些数据以及如何收集? What data does PayKka collect and how?

#### 3.1 您提供的数据 Data you provide

当您使用我们的产品及服务时，我们基于下文场景需要您提供或授权全部或部分的信息，包含可支持我们用于识别验证您的企业基本信息、企业关联个人身份信息，企业账户信息和交易信息。一旦您的账户完全设置好并开始使用 PayKka 进行交易，PayKka 将收集、处理和存储您的财务和交易信息。如您无法提供或拒绝提供所需信息，可能会影响您正常使用我们的产品及服务。

When you use our products and services, we need you to provide to or authorize us to access in whole or in part the following information based on the scenarios enumerated later, including basic corporate information, corporate-related personal identity information, corporate account information, and transaction information that can support us in identifying and verifying you. Once your account is fully set up and you start transacting with PayKka, PayKka will collect, process and store your financial and

transaction information. If you are unable to provide or refuse to provide the required information, it may affect your normal use of our products and services.

需要您提供或授权相关信息的场景包括以下但不限于：

Scenarios that require you to provide or authorize relevant information include the following but are not limited to:

#### A.注册与实名认证 Registration and real-name authentication

在您注册我司服务开通账号、进行实名认证时，您需要提供以下企业及个人数据：When you register for our service, open an account, and conduct real-name authentication, you need to provide the following corporate and personal data:

1) 企业基本信息：注册名称、营业名称、公司注册编号/统一社会信用代码/商业登记证号码、注册地址、营业地址、成立日期、注册联系邮箱地址、注册手机号码、公司注册证书/营业执照/商业经营登记证书、营业额、包含非自然人股东名称、注册编号、注册地与经营地的非自然人受益所有权文件； Basic information of the enterprise: registered name, business name, company registration number/unified social credit code/commercial registration number, registered address, business address, date of establishment, registered contact email address, registered mobile phone number, company registration certificate/business license/commercial operation registration certificate, turnover, including the names of non-natural person shareholders, registration number, ownership documents for non-natural persons located in the registration and eoperation areas;

2) 企业关联个人的身份信息（如法定代表人、董事、授权代理人、受益所有人（自然人））：姓名、国籍、性别、出生日期、身份证件类型、证件号码、证件有效期、个人常住地址、自然人股东名称；

Identity information of individuals affiliated with the enterprise (such as legal representatives, directors, authorized representatives, beneficial owners (natural persons)): name, nationality, gender, date of birth, type of identity document, document number, document expiry date, personal residential address, names of natural person shareholders;

3) 授权信息：如为授权代理人开户，需要提供企业法定代表人/董事/高级管理层手持证件/授权函的照片。

Authorization information: if opening an account for an authorized representative, it is necessary to provide photos of the company's legal representative/director/senior management holding the document/authorization letter.

4) 生物识别信息：如面部识别等。

Biometric information: facial recognition, etc.

## B. 创建收款账户 Create a collection account

在您完成注册开通账号后，可以选择开通收款账户以使用多币种收款服务。您需要提供以下账户信息： After you complete the registration and open an account, you can choose to open a collection account to use multi-currency collection services. You need to provide the following account information:

1) 账户类型：选择本地收款或者境内收款

Account type: choose local collection or domestic collection

2) 开户行名称 name of opening bank

3) 开户地 place of opened account

4) 账户备注名称 account remark name

\*如果您于 PayKka 申请创建欧洲的收款账户，根据 Article 13(1) of Directive (EU) 2015/849 就远程开户的相关规定，PayKka 需要搜集您的人脸生物信息进行校验。

If you apply to create a European collection account with PayKka, according to relevant provisions on remote account opening under Article 13(1) of Directive (EU) 2015/849, PayKka is required to collect your facial biometric information for verification.

## C. 申请绑定提现账户 Apply to bind a withdrawal account

如您想提取您账户收取的资金，需提供您预期提取款项的账户进行绑定。申请提现账户绑定过程中需要根据您选择的提现账户类型提供以下信息：

If you want to withdraw the funds collected in your account, you need to provide the account from which you expect to withdraw the funds for binding. When applying for withdrawal account binding, you need to provide the following information based on the withdrawal account type you choose:

1) 如您选择企业银行账户提现，需提供账户名称、开户银行、开户分行、账户号、银行对账单/银行流水/开户证明； If you choose to withdraw cash from a corporate bank account, you need to provide the account name, account opening bank, account opening branch, account number, bank statement/bank statement/account opening certificate;

2) 如您选择个人银行账户提现，需提供账户名称、开户银行、开户分行、账户号。 If you choose to withdraw cash from a personal bank account, you need to provide the account name, account opening bank, account opening branch, and account number.

#### D. 申请发起收款交易 Apply to initiate a collection transaction

如您需要发起收款交易，需要提供交易对应的订单、商品、物流、买家/付款人信息以及可支持验证该订单交易背景真实性的资料信息，包括但不限于：

If you need to initiate a payment transaction, you need to provide the order, product, logistics, buyer/payer information corresponding to the transaction, and information that can support the verification of the authenticity of the transaction background of the order, including but not limited to:

- 1) 订单信息：交易时间、合同编号、订单金额、买家名称、买家国别、合同附件；  
order information: transaction time, contract number, order amount, buyer's name, buyer's country, contract attachments;
- 2) 商品信息：商品网址、商品品类、商品名称、商品数量、申报方式；  
Product information: product URL, product category, product name, product quantity, declaration method;
- 3) 物流信息：是否已发货、发货日期/预计发货日期、运输方式、物流公司名称、目的地、物流单号、成交方式、货物原产地、物流运输经转国家/地区、询盘下单记录、货运安排沟通记录；

Logistics information: the delivery status of whether shipped or not, shipment date/estimated shipment date, shipping method, logistics company name, destination, tracking number, terms of delivery, country of origin of goods, logistics transit through countries/regions, inquiry order placement records, freight arrangement communication records.

#### E. 申请发起付款交易 Apply to initiate payment transaction

如您需要发起付款交易，需要提供付款用途、收款人信息以及收款人银行账户信息，包括但不限于：

If you need to initiate a payment transaction, you need to provide the payment purpose, payee information, and payee bank account information, including but not limited to:

- 1) 付款用途：提供您向收款人支付该笔款项的目的，如货款、物流仓储费、广告服务费等、技术服务费、咨询服务费等；

Purpose of payment: please specify the purpose of the payment to the payee, such as payment for goods, logistics and warehousing fees, advertising services, technical service fees, consulting service fees, etc.;

- 2) 收款人信息：收款人所在国家/地区、收款人名称、收款人昵称、联系人电话、联系人姓名、联系人邮箱、收款人相关网站地址；

Payee information: the country/region where the payee is located, payee's name, payee's nickname, contact telephone number, contact name, contact email, payee's related

website address;

3) 银行账户信息：收款人银行所在国家/地区、收款人银行账户名称、收款人开户银行名称、收款币种、收款银行的 SWIFT CODE/BIC 代码/Routing Number、收款人银行账号、收款人银行账户类型、开户银行详细地址；

Bank account information: the country/region where the payee's bank is located, payee's bank account name, payee's bank name, currency of payment, SWIFT CODE/BIC code/routing number of the payee's bank, payee's bank account number, type of payee's bank account, detailed address of the bank;

4) 或其他包含您付款交易明细、合同订单的信息与证明文件。

Or any other information and supporting documents related to your payment transaction details, contract orders.

#### F.信息征询书 Request for information

在您使用我司产品或服务期间，我司会在上述流程中对您提供所有的资料信息进行审查。当我司发现上述信息的真实性、正确性或完整性有待进一步核实时，我司可能会向您发起信息征询书要求您针对上述所提及的企业基本信息、企业关联个人身份信息、企业账户信息或交易信息进行补充，必要需要提供额外的证明文件。

During your use of our products or services, our company will review all the information you provide during the above process. When our company discovers that the authenticity, correctness or completeness of the above information needs to be further verified, our company may issue an information request to you and request you to provide the above mentioned basic enterprise information, enterprise-related personal identity information, and enterprise accounts. To supplement the information or transaction information, additional supporting documents are required if necessary.

当您使用 PayKka 收单产品时，除了以上内容，我们还需要在以下服务中共享您的信息：

When you use PayKka acquiring products, in addition to the above, we need to share your information in the following services:

#### G 线下 POS 收单 Offline POS acquiring:

我们还使用这些信息帮助您配置 PayKka 客户区中的设置、POS 终端现场服务、在商店安装 POS 终端、领取旧的/损坏的 POS 终端，以及建立或履行我们与您之间的合同所需采取的其他行动。所采集的信息内容包括但不限于：

We also use this information to help you configure settings in the PayKka customer area, POS terminal field service, install POS terminals in stores, pick up old/damaged POS terminals, and

other actions required to establish or fulfill a contract between us and you. The content of the information collected includes, but is not limited to:

- 1) 支付方式：记录客户使用的是现金、银行卡（包括借记卡、信用卡等）、第三方支付（如支付宝、微信支付等）进行付款。

Payment method: record whether the customer uses cash, bank card (including debit card, credit card, etc.), or third-party payment (e.g., Alipay, WeChat Pay, etc.) to make payment.

- 2) 银行卡信息：如果客户使用银行卡支付，POS 机会采集银行卡的卡号、有效期（信用卡）、CVV 码（信用卡安全码）等信息。

Bank card information: If the customer pays with a bank card, the POS will capture the card number, expiration date (for credit cards), CVV code (credit card security code) and other information of the card.

- 3) 交易金额：每笔交易的金额。

Transaction amount: the amount of each transaction.

- 4) 交易时间：交易发生的具体时间，包括年、月、日、时、分、秒等。

Transaction time: the specific time at which the transaction took place, including year, month, day, hour, minute and second.

- 5) 客户身份信息：姓名、联系方式（手机号码、电子邮箱等）。

Customer identification information: name, contact information (cell phone number, e-mail address, etc.).

- 6) 商户信息：商户名称、商户编号、店铺地址等。

Merchant information: merchant name, merchant number, store address, etc.

## H QR CODE

- (1) 设备信息：Device information:

- 1) 设备型号：用户使用的手机、平板电脑等设备的型号。

Device model: the model of the device used by the user, such as a cell phone or tablet.

- 2) 操作系统信息：用户设备的操作系统类型（如 iOS、Android 等）和版本号。

Operating system information: The type of operating system (such as iOS, Android, etc.) and version number of the user's device.

- 3) IP 地址：用户设备连接网络时的 IP 地址。

IP address: the IP address of the user's device when it is connected to the network.

(2) 身份验证信息： Identity verification information:

1) 生物识别信息（若开启相关功能）： 如指纹识别、面部识别等。

Biometric information (if relevant functions are enabled): such as fingerprint identification, facial recognition, etc.

2) 密码或验证码： 用户在进行支付操作时输入的密码、短信验证码等信息也会被采集。

Password or verification code: information such as password and SMS verification code entered by the user during the payment operation will also be captured.

3) 位置信息（取决于用户授权）： 会采集用户的地理位置信息。

Location information (depending on the user's authorization): the user's geographic location information will be captured.

### **3.2 通过 PayKka 的网站或应用程序收集的数据 Data collected through PayKka's website or application**

按照 PayKka 的政策，PayKka 的网站使用 Cookie 来改善您的用户体验，防止欺诈活动，并显示互联网广告，比如横幅广告。

In accordance with PayKka's policy, PayKka's websites use cookies to improve your user experience, prevent fraudulent activity, and display internet advertising, such as banner ads.

为了防止欺诈和网络犯罪，PayKka 可能会使用一些技术手段，比如会话 Cookie、持久性 Cookie、网络信标、日志文件等来收集会话数据、设备信息、浏览的域名、浏览器类型、操作系统、看过的页面、点过的链接、IP 地址，以及使用 PayKka 服务的时间长短等信息，以验证您的登录是否真实。会话 Cookie 临时存在于您的浏览器中，主要是为了在您浏览网站时传递个人数据，避免重复提交。而持久性 Cookie 会更长时间地保存在您的浏览器中，主要是为了帮助 PayKka 确认您的身份，监控您在网站上的使用情况，并与 PayKka 的合作伙伴进行关联。一旦您关闭网络浏览器，会话 Cookie 就会被删除，针对持久性 Cookie，您所使用的浏览器根据 PayKka 设置的有效日期，过期后自动删除。PayKka 还使用网络信标来统计用户访问网页的情况，但它不会收集任何关于您的个人数据。

In order to prevent fraud and cybercrime, PayKka may use some technical means, such as session cookies, persistent cookies, web beacons, log files, etc. to collect session data, device information, browsed domain names, browser types, operating systems, pages

you have visited, links you have clicked, IP address, and the length of time you have used PayKka services, etc. to verify whether your login is authentic. Session cookies temporarily exist in your browser, mainly to pass personal data when you browse the website and avoid repeated submissions. Persistent cookies will be stored in your browser for a longer period of time, mainly to help PayKka confirm your identity, monitor your use of the website, and associate with PayKka's partners. Session cookies will be deleted once you close your web browser. For persistent cookies, the browser you are using will automatically delete them after expiration based on the expiration date set by PayKka. PayKka also uses web beacons to count users' visits to web pages, but it does not collect any personal data about you.

根据您的个人喜好，您可以自行设置浏览器，选择接受或拒绝 cookie。详细信息请参考 [aboutcookies.org](http://aboutcookies.org)。如果您希望删除计算机上已存在的所有 Cookie，大多数浏览器都提供相应的设置来防止其保存。但要注意，这样做可能导致您需要在每次访问网站时手动调整某些首选项，并且有些服务和功能可能会受到影响无法正常工作。

Depending on your personal preferences, you can set your browser to accept or reject cookies. Please see [aboutcookies.org](http://aboutcookies.org) for details. If you wish to delete all cookies that already exist on your computer, most browsers offer settings to prevent them from being saved. However, be aware that doing so may result in your manual adjustment of some preferences each time you visit the website, and some services and features may be affected and not work properly.

### 3.3 从第三方接收的数据 Data received from third parties

为了保护 PayKka 的客户和自身免受欺诈，在您注册使用我司产品服务或进行交易的过程中，PayKka 可能从合作的服务提供商、互联网平台、信用参考机构收集您的数据来验证您的企业基本信息、企业关联个人身份信息、企业账户信息以及交易信息的真实性、准确性，PayKka 会要求上述商业合作伙伴确保其信息来源的合法性。在此验证过程中，PayKka 可能会收到和处理有关您的个人数据。对于非注册用户，PayKka 可能会使用公开可获得的信息或由第三方（在您的同意下）共享的信息，以便向您提供相关的业务产品信息。

In order to protect PayKka's customers and PayKka from fraud, when you register to use our products and services or conduct transactions, PayKka may collect your data from cooperative service providers, internet platforms, and credit reference agencies to verify your business. Regarding the authenticity and accuracy of basic information, corporate-related personal identity information, corporate account information and transaction information, PayKka will require the above-mentioned business partners to ensure the legitimacy of their information sources. During this verification process,

PayKka may receive and process personal data about you. For non-registered users, PayKka may use publicly available information or information shared by third parties (with your consent) to provide you with relevant business product information.

### 3.4 沟通记录 **Communication records**

为了质量控制、培训、合规性和记录保存等目的，所有通话都会被录音，并存储通讯记录。在这些交互过程中披露的任何信息都将保留在这些录音中。一般而言，PayKka 会事先告知您通话将会被录音，如您不同意，您可以选择退出通话并通过书面方式联络我们。

All calls are recorded and a record of the communications are stored for quality control, training, compliance and archiving purposes. Any information disclosed during these interactions will remain on these recordings. Generally speaking, PayKka will inform you in advance that the call will be recorded. If you do not agree, you can choose to exit the call and contact us in writing.

### 3.5 日志信息 **Log information**

在向您提供服务时，我们会通过浏览器采集、储存您的浏览器信息（IP 地址）及位置信息（你登录设备所在地）。

When providing services to you, we will collect and store your browser information (IP address) and location information (the location of your login device) through your browser.

### 3.6 征得您授权同意的例外 **Exceptions with your authorization and consent**

在根据中国（包括中国大陆和中国香港）以及其他相关国家、地区和领域的法律法规规定和监管要求，以下情形中收集您的个人数据无需征得您的授权同意：

In accordance with the laws, regulations and regulatory requirements of China (including Mainland China and Hong Kong, China) and other relevant countries, regions and areas, the collection of your personal data does not require your authorization and consent in the following situations:

- A. 为订立、履行个人作为一方当事人的合同所必需，或者按照依法制定的劳动规章制度和依法签订的集体合同实施人力资源管理所必需； Necessary for the conclusion and performance of a contract to which the individual is a party, or necessary for the implementation of human resources management in accordance with the labor regulations formulated and the collective contract signed pursuant to the law;
- B. 为履行法定职责或者法定义务所必需； Necessary to perform legal duties or legal obligations;

- C.为应对突发公共卫生事件，或者紧急情况下为保护自然人的生命健康和财产安全所必需； In order to respond to public health emergencies, or necessary to protect the life, health and property safety of natural persons in emergency situations;
- D.为公共利益实施新闻报道、舆论监督等行为，在合理的范围内处理个人数据； Necessary for processing personal data within a reasonable scope when implementing news reporting, public opinion supervision and other activities for the public interest;
- E.依照法律规定在合理的范围内处理个人自行公开或者其他已经合法公开的个人数据 Process personal data that individuals disclose themselves or that have been legally disclosed by others within a reasonable scope in accordance with legal provisions;
- F.法律、行政法规规定的其他情形。Other situations stipulated by laws and administrative regulations.

## **4. PayKka 将您的个人数据用于什么目的呢？ For what purposes does PayKka use your personal data?**

### **4.1 注册和管理 Registration and Management**

PayKka 使用您的个人数据使您能够在 PayKka 注册账户。一旦您拥有 PayKka 的账户，PayKka 将使用您提供的详细信息与您联系，并回复任何查询或请求。PayKka 可能会在管理您的账户时使用您的个人数据，包括联系您以更新账户详情（这有助于 PayKka 尽可能保持记录的最新状态），或者通知您对可能影响 PayKka 向您提供的产品或服务变更或改进。

PayKka uses your personal data to enable you to register an account with PayKka. Once you have an account with PayKka, PayKka will contact you using the details you provide and respond to any inquiries or requests. PayKka may use your personal data to administer your account, including when contacting you to update your account details (this helps PayKka keep its records as up-to-date as possible), or notifying you about products that may affect PayKka's provision of services to you. or changes or improvements to the Services.

### **4.2 PayKka 的产品和服务 PayKka's Products and Services**

为了向您提供 PayKka 的产品和服务，并依前述产品或服务相关协议履行对您的义务，PayKka 将使用您的个人数据。此外，PayKka 可能需要通知您与 PayKka 的产品和服务相关的任何变更。

In order to provide you with PayKka's products and services and to perform its obligations to you in accordance with the aforementioned product or service-related agreements, PayKka will use your personal data. In addition, PayKka may need to notify

you of any changes related to PayKka's products and services.

### **4.3 遵守法律法规和监管要求 Follow Legal Regulations And Regulatory Requirements**

根据反洗钱/恐怖主义融资法律等监管要求，PayKka 将对其客户及其受益人的个人数据进行必要的控制和检查，以履行尽职调查义务。这可能包括通过第三方评估服务机构和其他个人数据来源进行软查询以及使用评分方法来识别风险和验证身份。作为 PayKka 的验证要求的一部分，PayKka 还可能需要身份证明文件和地址证明副本。在与您的业务关系过程中，PayKka 可能不时需要额外的文件和个人数据，以确保 PayKka 遵守反洗钱和反恐融资等监管要求。

According to the regulatory requirements such as anti-money laundering/counter-terrorism financing laws, PayKka will conduct necessary controls and checks on personal data of its clients and clients' beneficiaries to fulfill its due diligence obligations. This may include conducting soft inquiries through third-party assessment service agencies and other personal data sources, as well as using scoring methods to identify risks and verify identities. As part of PayKka's verification requirements, PayKka may also need copies of identity and address proof documents from you. During the course of your business relationship with PayKka, additional documents and personal data may be required from time to time to ensure compliance with anti-money laundering and counter-terrorism financing regulatory requirements.

PayKka 还可能使用您的个人数据，以遵守其他适用的法律、法规，或作为反洗钱/反恐怖融资及制裁履职义务机构协助有关政府和/或监管机构进行执法和调查。

PayKka may also use your personal data to comply with other applicable laws and regulations, or to assist relevant government and/or regulatory agencies in law enforcement and investigations as part of its obligations related to anti-money laundering/counter-terrorism financing and sanctions.

### **4.4 安全保障 Security**

在您使用 PayKka 的产品和服务期间，为确保为您本人发起的真实交易和资金安全，防范欺诈或身份冒用风险，PayKka 可能使用您的个人数据用于验证个人身份、交易授权、诈骗监测、预防或禁止非法活动、降低风险、存档和备份用途。

During your use of PayKka's products and services, in order to ensure the authenticity of the transactions and security of funds initiated for you and to prevent the risk of fraud or identity theft, PayKka may use your personal data for personal identity verification, transaction authorization, fraud monitoring, prevention or inhibition of illegal activities,

risk reduction, archiving and backup purposes.

#### **4.5 用户推广 User Promotion**

在您明确表示同意接收用户推广活动时，PayKka 可能使用您的个人数据向您介绍 PayKka 的产品和服务，告知您一些新产品/服务，并询问您对 PayKka 的体验。

When you expressly agree to receive user promotion activities, PayKka may use your personal data to introduce you to PayKka's products and services, inform you of some new products/services, and ask about your experience with PayKka.

#### **4.6 监控 Monitoring**

在获取您同意的前提下，PayKka 记录所有的电话通话，以确保安全和培训目的，同时核实您对 PayKka 的指示。

With your consent, PayKka records all phone calls for security and training purposes and to verify your instructions to PayKka.

#### **4.7 合法利益 Legitimate Interests**

如果 PayKka 认为有必要满足 PayKka 的合法利益，PayKka 可能会使用您的个人数据，包括但不限于通知客户 PayKka 产品或服务的变更，为内部运营管理 PayKka 的网站，包括在技术手段脱敏的基础上进行故障排除、数据分析、测试、研究、统计和调查，以及作为 PayKka 努力评估和改进 PayKka 的产品和服务或保持 PayKka 产品和服务的安全性和可靠性。

PayKka may use your personal data if PayKka considers it necessary to fulfill PayKka's legitimate interests, including but not limited to informing customers of changes to PayKka products or services, managing PayKka's website for internal operations, conducting troubleshooting, data analysis, testing, research, statistics and surveys on a desensitization basis by technical means, and as part of PayKka's efforts to evaluate and improve PayKka's products and services or maintain the security and reliability of PayKka's products and services.

#### **4.8 其他 Other**

当 PayKka 需要将您的个人数据用于本政策未载明的其它用途时，或基于特定目的收集而来的信息用于其他目的时，会按照相关法律法规及国家标准的要求以确认协议及具体场景下的书面确认动作等形式再次单独征求您的同意。

When PayKka needs to use your personal data for other purposes not stated in this policy, or when the information collected for a specific purpose is used for other

purposes, it will confirm the agreement and specific requirements in accordance with the requirements of relevant laws, regulations and national standards. We will separately seek your consent again in the form of written confirmation actions under the scenario.

## 5. PayKka 与谁分享您的个人数据以及如何转移？

### **Who does PayKka share your personal data with and how is it transferred?**

PayKka 将按照适用法律法规的要求，在取得您同意或具备其他合法性基础的前提下向我们的合作方进行前述个人数据传输。PayKka 会依据适用法律法规的要求，评估个人数据传输的合法性、正当性以及必要性，且与 PayKka 的合作方按照适用法律法规、相关协议的约定来处理您提供的个人数据。这些合作方所在的具有管辖权的国家或地区关于信息保护的规定，可能与您所在国家或地区信息保护规则有所不同，包括有关于以下几个方面：向监管机构传输信息，或传输给在海外运营的、代表 PayKka 或 PayKka 的供应商处理信息的员工，并可能由前述员工处理您的需求并提供支持服务。

PayKka will transfer the aforementioned personal data to our partners with your consent or other legal basis in accordance with the requirements of applicable laws and regulations. PayKka will evaluate the legality, legitimacy and necessity of the transfer of personal data in accordance with the requirements of applicable laws and regulations, and its partners with PayKka will process the personal data you provide in accordance with applicable laws, regulations and relevant agreements. The information protection regulations of the countries or regions with jurisdiction where these partners are located may be different from the information protection rules of your country or region, including several aspects regarding transfer of information to regulatory authorities, or to those operating overseas, on behalf of PayKka or employees of PayKka's suppliers process information, and your needs and support services may be processed by said employees.

下列段落列出了在 PayKka 全部产品或服务项下您的有关个人数据由数据控制者向相关方传输的可能情况，具体适用您的情况，将以您具体选择使用的 PayKka 产品或服务为准。仅当您使用特定产品与/或服务，PayKka 才会根据“最小必要原则”，仅为实现向您提供产品或服务的目的，由数据控制者向相关方传输您的相关个人数据。

The following paragraphs list the possible circumstances under which your personal data will be transferred from the data controller to the relevant parties under all PayKka products or services. The specific application for your situation will be based on the PayKka products or services you specifically choose to use. Only when you use specific

products and/or services, PayKka will transfer your relevant personal data to the relevant parties from the data controller only for the purpose of providing you with products or services based on the " the principle of minimum necessity ".

如果您有关于您的个人数据的更多疑问和建议，可以依照本服务隐私政策有关指引，与 PayKka 取得联系。您也可以根据本隐私政策结尾处关于我们共享数据的第三方列表，与对应的第三方直接取得联系。我们将随着 PayKka 业务扩展、新增功能或法律法规变化等，不定期对该列表进行更新。

If you have more questions and suggestions about your personal data, you can contact PayKka in accordance with the relevant guidelines of this service's Privacy Policy. You can also contact the corresponding third party directly according to the list of third parties with which we share data at the end of this Privacy Policy. We will update this list from time to time as PayKka's business expands, new features are added, or laws and regulations change.

### **5.1 金融合作伙伴 Financial Partners**

为了确保您的付款能够尽快安全抵达目标账户，PayKka 在全球范围内与多个金融机构、银行机构、其他支付机构合作向您提供服务。而您的部分个人数据的传输至前述金融或其他支付机构，对于向您提供 PayKka 相关产品或服务是必要的。PayKka 会通过与其签署合同，要求金融合作伙伴承担严格的数据保密义务，在严格遵守相关法律法规与监管要求的前提下，只能出于为您提供服务的目的使用您的信息。

In order to ensure that your payment reaches the target account safely as soon as possible, PayKka cooperates with multiple financial institutions, banking institutions, and other payment institutions around the world to provide you with services. The transfer of some of your personal data to the aforementioned financial or other payment institutions is necessary to provide you with PayKka-related products or services. PayKka will require financial partners to assume strict data confidentiality obligations by signing contracts with them, and can only use your information for the purpose of providing services to you under the premise of strictly complying with relevant laws, regulations and regulatory requirements.

为了保证透明度、实现信息核实目的和法律要求，PayKka 需要您在付款过程中提供某些个人数据，这些个人数据可能包括：

您的姓名、您的出生日期、您的国籍、您的性别、您的常住地址、您的身份证件号码、您的国家身份证明文件（例如身份证、护照、驾照）、收款人个人身份信息（适用于个人，包含收款人姓名，收款人国籍，收款人常住地址，收款人银行账号，收款人）

To ensure transparency, fulfillment of information verification purposes and legal requirements, PayKka requires you to provide certain personal data during the payment process. These personal data may include:

your name, your date of birth, your nationality, your gender, your permanent address, your ID number, your national identity document (such as ID card, passport, driver's license), personal identification information of the payee (applicable to individuals, including payee's name, payee's nationality, payee's permanent address, payee's bank account number, payee).

## 5.2 商业合作伙伴 Business Partners

如果 PayKka 的一个商业合作伙伴向您介绍了 PayKka（这些合作伙伴包括代理商、开发服务商等），为了履行与该合作伙伴的合同义务，以及为了确定您是否适合该服务，PayKka 可能会与商业合作伙伴共享您的个人数据和交易数据，并根据上述数据评估您的信用和信用价值以确认应向您提供何种金融服务。PayKka 会通过与其签署协议要求商业合作伙伴承担严格的保密义务，在严格遵守相关法律法规与监管要求的前提下，仅出于为您提供服务的目的使用您的信息，不得出于自身利益或任何其他目的使用您个人身份信息和交易数据。PayKka 还要求商业合作伙伴采取足够的技术安全措施来保护您的数据。

If one of PayKka's business partners introduces you to PayKka (these partners include agents, development service providers, etc.), PayKka may communicate with the business partner in order to fulfill its contractual obligations with the partner and to determine whether you are suitable for the service. Partners share your personal data and transaction data and evaluate your credit and credit worthiness based on the above data to determine what financial services should be provided to you. PayKka will require business partners to assume strict confidentiality obligations by signing agreements with them. Under the premise of strictly complying with relevant laws, regulations and regulatory requirements, PayKka will only use your information for the purpose of providing services to you, and shall not use it for its own benefit or for any other purpose. Use your personally identifiable information and transaction data for other purposes. PayKka also requires business partners to take adequate technical security measures to protect your data.

另外，如果已征求了您的确同意，PayKka 可能会将您的个人身份信息和交易数据与商业合作伙伴共享，以用于营销目的。

In addition, if your confirmed consent has been obtained, PayKka may share your personally identifiable information and transaction data with business partners for marketing purposes.

这些个人数据和交易数据可能包括：

This personal data and transaction data may include:

您的姓名、您的出生日期、您的国籍、您的性别、您的常住地址、您的身份证件号码、您的国家身份证明文件（例如身份证、护照、驾照）、您的银行账号、您的开户行、您的消费和交易记录。

your name, your date of birth, your nationality, your gender, your permanent address, your ID number, your national identity document (such as ID Card, Passport, driver's license), your bank account number, your account opening bank, your transaction records.

### 5.3 其他参与方 Other parties

PayKka 可能会与一些其他参与方共享您的个人数据，包括下列服务提供商：支持技术或基础设施、云存储、进行市场研究、营销分析、检测欺诈、验证身份并执行审计或其他功能的服务商。这些公司是根据保密协议为 PayKka 提供服务的，有些还会帮助 PayKka 履行与您和监管机构之间的义务，比如处理卡交易或验证文件。这些公司无权向您销售其他服务。PayKka 对上述公司资质进行严格的审查，这些可信赖的公司可能位于您所在国家或地区，或者是您在其他国家进行交易时的海外分支机构。无论他们在哪里，PayKka 都会确保这些服务商提供足够的保护数据保护措施。如果情况需要，PayKka 也会与上述服务商另行签署必要协议或要求其遵循适当的保护框架，以确保您的个人数据安全转移。

PayKka may share your personal data with a number of other parties, including service providers that provide support technology or infrastructure, cloud storage, conduct market research, marketing analysis, detect fraud, identity verification and auditing or other functions. These companies provide services to PayKka under confidentiality agreements, and some also help PayKka fulfill its obligations with you and regulators, such as processing card transactions or verifying documents. These companies do not have the authority to sell other services to you. PayKka conducts strict reviews on the qualifications of the above companies. These trustworthy companies may be located in your country or region, or they may be overseas branches when you conduct transactions in other countries. Wherever they are, PayKka ensures that these service providers provide adequate data protection measures. If circumstances require, PayKka will also sign separate necessary agreements with the above-mentioned service providers or require them to follow appropriate protection frameworks to ensure the safe transfer of your personal data.

这些个人数据和交易数据可能包括：

This personal data and transaction data may include:

1) 个人身份信息：姓名、国籍、性别、出生日期、身份证件类型、证件号码、证件有效期、个人常住地址、身份证件正反面照片；

Personal identity information: name, nationality, gender, date of birth, ID type, ID number, ID validity period, personal permanent address, and photos of the front and back of the ID;

2) 个人财产信息：个人银行账号、个人账户开户行名称、开户行所在国家/地区、开户行地址、开户行 SWIFT CODE/ IBAN/Routing Number，交易和消费记录等。

Personal property information: personal bank account number, name of the bank where the personal account is opened, country/region of the bank where the bank is located, address of the bank, SWIFT CODE/IBAN/routing number of the bank, transaction records, etc.

#### **5.4 监管机构和执法部门 Regulators and Law Enforcement Authorities**

PayKka 可能需要与政府部门、监管机构、执法/税务/海关机构、法院或有权机关指定的机构共享您的个人数据。包括但不限于以下几种情形：1. 当我们收到传票、法庭命令或其他法律程序要求我们必须披露您的个人数据时；2. 当 PayKka 依法必须披露您的个人数据以防止实际损害或经济损失时；3. 当需要披露与涉嫌非法活动有关的个人数据，比如出于犯罪侦查、起诉、审判和判决执行等相关目的；4. 与国家安全、公共安全、重大公共利益直接相关的情形；5. 其他依法有必要披露与违反我们的隐私政策或用户协议相关的行为时。我们绝对不会出售您的个人数据。

PayKka may need to share your personal data with government departments, regulatory agencies, law enforcement/tax/customs agencies, courts or agencies designated by competent authorities, including but not limited to the following situations: 1. When we receive a subpoena, court order or when other legal process requires us to disclose your personal data; 2. when PayKka must disclose your personal data in accordance with the law to prevent actual damage or economic damage when there is a loss; 3. when it is necessary to disclose personal data related to suspected illegal activities, such as for criminal investigation, prosecution, trial and judgment execution and other related purposes; 4. situations directly related to national security, public safety, and major public interests; 5. other disclosures related to violations of our Privacy Policy or User Agreement when it is necessary to do so by law. We will never sell your personal data.

## 6. PayKka 会如何保留您的个人数据呢？

### How does PayKka retain your personal data?

PayKka 会根据反洗钱、反恐怖融资法律监管规定及内部客户身份信息与交易记录保存制度要求保留您的个人数据五年，保存时限以本隐私政策所述目的及适用法律法规及监管规定的最短时间限制为准，除法律或监管规定对客户个人数据或交易记录有额外更长的保存期限要求。PayKka 会采取合理必要的措施，确保您的个人数据安全处理，并遵守我们的隐私政策和相关个人数据保护规定。在您同意的前提下，我们只会在必要期限内，为了您已同意的目的并且仅仅在实现该目的范围内，保留您的个人数据，且严格遵循最小必要原则。如果相关数据不再需要存储或使用并且法律不再限制，我们会及时采取删除或匿名化处理措施。决定保留时间的标准包括：

PayKka will retain your personal data for five years in accordance with the legal and regulatory requirements for anti-money laundering and anti-terrorist financing and the internal customer identity information and transaction record retention system. The retention period shall be the shortest for the purposes stated in this Privacy Policy and applicable laws, regulations and regulatory requirements. The time limit shall prevail, unless legal or regulatory requirements require additional longer retention periods for customer personal data or transaction records. PayKka will take reasonable and necessary measures to ensure that your personal data is processed securely and in compliance with our Privacy Policy and relevant personal data protection regulations. With your consent, we will only retain your personal data for the necessary period, for the purposes you have agreed to and only within the scope of achieving that purpose, strictly following the principle of the least necessity. If the relevant data no longer needs to be stored or used and is no longer restricted by law, we will promptly take measures to delete or anonymize it. Criteria for determining retention time include:

- 监管规定 regulatory requirements
- 司法或有权机关协查要求 law enforcement inquiry
- 可能涉及到我们的法律诉讼 legal proceedings that may involve us
- 为向您提供服务所需的个人数据 personal data required to provide you with services
- 合法处理您个人数据的依据，比如您的同意 the basis for lawful processing of your personal data, such as your consent

与 PayKka 客户无关的相关方和受益人的个人数据，将根据适用法律要求保存一段时间。PayKka 的服务覆盖全球，因此根据适用法律法规，您的个人数据可能在 PayKka 业务范围所在的国家/地区和我们与服务提供商合作的地区进行存储和处理。

Personal data of related parties and beneficiaries not related to PayKka customers will be retained for a period of time in accordance with applicable legal requirements.

PayKka's services cover the world, so in accordance with applicable laws and regulations, your personal data may be stored and processed in the countries/regions where PayKka's business and cooperation with relevant service providers locate.

PayKka 会采取措施确保这类传输符合适用于接收方的个人数据保护法律法规，并且符合我们在本政策中所描述的标准。在您提交个人数据前，PayKka 会充分告知您我们具体将采集哪些个人数据、数据处理目的以及处理方式，在您确认同意后才会按照本隐私政策共享、存储或处理个人数据。对于依法需要获取您单独同意的事项，PayKka 会按照法律法规的要求，事先获取您的单独同意。

PayKka takes steps to ensure that such transfers comply with the personal data protection laws and regulations applicable to the data recipient and comply with our standards described in this policy. Before you submit personal data, PayKka will fully inform you of the specific personal data we will collect, the purpose of data processing, and the method of processing. Personal data will be shared, stored or processed in accordance with this Privacy Policy only after you give your consent. For matters that require your separate consent according to law, PayKka will obtain your separate consent in advance in accordance with the requirements of laws and regulations.

## **7. PayKka 如何与您保持沟通？**

### **How does PayKka maintain communication with you?**

PayKka 定期通过电子邮件和电话与您保持联系，以便提供客户服务并满足您的需求。此外，为了完成注册和交易流程，PayKka 将使用您提供的电子邮件地址、电话号码或邮寄地址向您发送通知。

PayKka maintains regular contact with you via email and phone in order to provide customer service and meet your needs. In addition, in order to complete the registration and transaction process, PayKka will send you notifications using the email address, phone number or mailing address you provide.

我们还会向您发送 PayKka 产品和服务涉及收集个人数据种类、个人数据处理目的、处理方式的重要变更通知，以确保您随时了解最新动态，在充分告知您的前提下再次征求您的确认同意。同时，根据法律规定，我们也可能向您发送一些通知和披露内容。请注意，如果您选择不接收上述内容，可能会影响您继续使用 PayKka 服务。

We will also send you notifications of important changes in PayKka products and services involving the types of personal data collected, the purpose of personal data processing, and the processing methods to ensure that you are always informed of the latest updates, and we will ask for your confirmation and consent again after fully

informing you. At the same time, we may also send you some notices and disclosures in accordance with legal requirements. Please note that if you choose not to receive the above content, it may affect your continued use of PayKka services.

## 8. PayKka 如何进行营销? How does PayKka market?

一旦您成为 PayKka 的客户，我们将在征求您的同意后，根据您的需求和偏好，向您提供与您相关的产品信息、费率以及市场更新。

Once you become a PayKka customer, we will provide you with product information, rates and market updates relevant to you based on your needs and preferences with your consent.

对于 PayKka 网站的访问者，如果您同意接收来自我们的营销材料，我们还会使用您的个人数据向您提供一般产品、市场更新或费率变动的信息。

For visitors to the PayKka website, if you have consented to receive marketing materials from us, we will also use your personal data to provide you with information about general products, market updates or rate changes.

如果您改变了对所需接收的营销内容的看法，或者改变了您希望如何接收这些内容的想法，或者您决定不希望接收这些类型的沟通，您可以随时取消订阅：

If you change your mind about the marketing content you want to receive, or how you want to receive it, or you decide you don't want to receive these types of communications, you can unsubscribe at any time:

- 您可以发送电子邮件至 PayKka 隐私办公室 [privacy@xgd.com](mailto:privacy@xgd.com) 或客户支持邮箱 [PaykkaSupport@XGD.com](mailto:PaykkaSupport@XGD.com) 进行取消订阅； You can unsubscribe by sending an email to PayKka Privacy Office at [privacy@xgd.com](mailto:privacy@xgd.com) or customer support [PaykkaSupport@XGD.com](mailto:PaykkaSupport@XGD.com);

- 如果您是注册用户，您还可以通过 PayKka 交易平台直接操作取消订阅；或  
If you are a registered user, you can also cancel your subscription directly through the PayKka transaction platform; or

- 您可以点击您收到的任何电子邮件底部的链接。

You can click the link at the bottom of any email you receive.

请放心，如果您选择不接收 PayKka 的营销沟通，不会影响您获取我们提供的任何服务。

您可以随时更改您的想法，无论更改次数。

Please be assured that if you choose not to receive marketing communications from PayKka, it will not affect your access to any services we provide. You can change your mind at any time, no matter how many times.

## 9. 您有何权利呢？ What are your rights?

PayKka 承认并支持行使以下权利。如果您希望行使这些权利中的任何一项，请联系 PayKka 隐私办公室 (privacy@xgd.com) 或客户支持邮箱 (PaykkaSupport@XGD.com)，PayKka 将尽快回复您的请求。

PayKka acknowledges and supports the exercise of the following rights. If you wish to exercise any of these rights, please contact the PayKka Privacy Office (privacy@xgd.com) or customer support (PaykkaSupport@XGD.com) and PayKka will respond to your request as soon as possible.

为了能够帮助您，PayKka 需要您提供身份证明以及足够的个人数据，以便 PayKka 能够找到相关的数据并验证您是账户持有人或者经过充分授权的人士。如果 PayKka 无法验证您的身份或权限，或者无法确认个人数据确实属于您，那么 PayKka 将无法回应您的请求。PayKka 会向您解释拒绝请求的理由。不仅仅是注册用户，PayKka 还欢迎非注册用户（比如网站用户、相关的支付方和受益人）与 PayKka 联系以提出类似的请求。

In order to be able to assist you, PayKka requires you to provide proof of identity and sufficient personal data so that PayKka can find the relevant data and verify that you are the account holder or a fully authorized person. If PayKka cannot verify your identity or authority, or confirm that the personal data indeed belongs to you, PayKka will not be able to respond to your request. PayKka will explain to you the reason for rejecting the request. Not only registered users, PayKka also welcomes non-registered users (such as website users, relevant payers and beneficiaries) to contact PayKka to make similar requests.

### 9.1 要求更正 PayKka 所持有的关于您的个人数据:

Request correction of personal data held by PayKka about you:

为了更正 PayKka 所持有的关于您的个人数据，您可通过登录您的 PayKka 账号来查看您的身份信息（如邮箱地址、联系电话等）、银行账户信息（如提现账户）以及交易记录等。如果您发现个人数据存在错误，您有权要求 PayKka 进行更正。请与 PayKka 联系，PayKka 将进行必要的更改，但在此之前 PayKka 需要验证个人数据的准确性。

In order to correct the personal data held by PayKka about you, you can log in to your

PayKka account to view your identity information (such as email address, contact number, etc.), bank account information (such as withdrawal account), and transaction records. If you discover an error in your personal data, you have the right to ask PayKka to correct it. Please contact PayKka and PayKka will make the necessary changes, but before doing so PayKka will need to verify the accuracy of the personal data.

## 9.2 要求 PayKka 停止进一步处理您的个人数据:

Request PayKka to stop further processing of your personal data:

若您欲中止 PayKka 对您个人数据的处理，PayKka 将进行调查，以评估是否存在继续处理的重要理由，并与您一同探讨调查结果。

如果 PayKka 因为法律或监管义务需要您的个人数据，或是为了履行您参与的公司义务而必须处理您的个人数据，那 PayKka 将在最大限度内不处理与上述目的无关的个人数据。

If you wish to stop PayKka's processing of your personal data, PayKka will conduct an investigation to assess whether there are significant grounds for continued processing and discuss the results of the investigation with you.

If PayKka requires your personal data due to legal or regulatory obligations, or if it is necessary to process your personal data to fulfill a contractual obligation to which you are party, PayKka will, to the greatest extent possible, not process personal data unrelated to the above purposes.

请您留意，即便您有权随时撤回对 PayKka 处理您个人数据的同意（若处理基于您的同意），基于法律规定，您撤回同意将不会影响撤回前基于您的同意而进行的个人数据收集、处理行为的有效性。但若您通过以下联系方式与 PayKka 联系撤回同意，这可能会阻止 PayKka 继续向您提供全部或部分服务。不过，您随时可以撤回 PayKka 处理您个人数据用于营销沟通的同意。

Please note that even if you have the right to withdraw your consent to PayKka's processing of your personal data at any time (if the processing is based on your consent), based on legal provisions, your withdrawal of consent will not affect the collection of personal data based on your consent before the withdrawal or the effectiveness of processing behavior. However, if you contact PayKka through the contact information below to withdraw your consent, this may prevent PayKka from continuing to provide all or part of its services to you. However, you may withdraw your consent to PayKka processing your personal data for marketing communications at any time.

### 9.3 注销您的账号: **Cancel your account:**

一旦您符合约定的注销条件，您就可以随时注销您的 PayKka 账号。在此过程中，请确保您的账号没有任何未决的纠纷、调查或欠款。在您注销账号后，PayKka 将会停止对您的信息的收集和使用，法律法规或监管部门另有规定的除外。

Once you meet the agreed cancellation conditions, you can cancel your PayKka account at any time. During this process, please ensure that your account does not have any outstanding disputes, investigations, or outstanding balances. After you cancel your account, PayKka will stop collecting and using your information, unless otherwise provided by laws, regulations or regulatory authorities.

### 9.4 要求 PayKka 删除您的个人数据 **Request PayKka to delete your personal data**

您可根据以下情况，要求 PayKka 删除您的个人数据：

You may request PayKka to delete your personal data based on the following circumstances:

- A. 数据处理目的已实现、无法实现或者为实现处理目的不再必要，且依法无强制性存储要求； The purpose of data processing has been achieved, cannot be achieved, or is no longer necessary to achieve the purpose of processing, and there are no mandatory storage requirements in accordance with the law;
- B. PayKka 停止提供产品、功能或者服务，且法定个人数据保存期限已届满； PayKka stops providing products, functions or services, and the legal personal data retention period has expired;
- C. 如果您撤回同意，且法定个人数据保存期限已届满； If you withdraw your consent and the statutory personal data retention period has expired;
- D. 如果我们违反法律、行政法规或者违反隐私政策处理个人数据； If we process personal data in violation of laws, administrative regulations or Privacy Policy;
- E. 法律、行政法规规定的其他情形。 Other situations stipulated by laws and administrative regulations.

您可通发送邮件至 [privacy@xgd.com](mailto:privacy@xgd.com) 与 PayKka 隐私办公室、或者客户支持邮箱 [PaykkaSupport@XGD.com](mailto:PaykkaSupport@XGD.com) 取得联系，要求 PayKka 对相关个人数据进行删除。当经过调查和分析后，如 PayKka 认为受限于适用法律法规和安全技术，可能无法立即从备份系统中删除相应的信息，此时 PayKka 将安全地存储您的个人数据并将其与任何进一步处理隔离，直到备份可以清除或实现匿名。

You can contact the PayKka Privacy Office by sending an email to [privacy@xgd.com](mailto:privacy@xgd.com) or customer support email [PaykkaSupport@XGD.com](mailto:PaykkaSupport@XGD.com) and request PayKka to delete relevant personal data. After investigation and analysis, if PayKka believes that due to

applicable laws, regulations and security technologies, it may not be possible to immediately delete the corresponding information from the backup system, at this time PayKka will securely store your personal data and keep it separate from any further processing. Quarantine until backup can be purged or anonymization achieved.

## 9.5 要求不完全受制于自动决策和分析

### **Requirements not entirely subject to automated decision-making and analysis**

PayKka 尊重每一位用户以及与我们沟通的个人或组织。在没有人员进行评估或决策的情况下，PayKka 不会产生对您具有法律影响的结论或自动决策。如果您认为自己受到了不公正的影响，请与 PayKka 联系以进一步讨论。PayKka 随时愿意与您探讨这个问题，以确保公平公正。

PayKka respects every user and person or organization that communicates with us. PayKka does not generate conclusions or automated decisions that have legal implications for you without a human being performing the evaluation or decision-making. If you feel you have been unfairly affected, please contact PayKka to discuss further. PayKka is always willing to discuss this issue with you to ensure fairness.

## 10. 我们如何保护您的个人数据？ How do we protect your personal data?

如 PayKka 非常重视您的数据安全。PayKka 在内部建立与采用了严格的数据信息保护制度与安全防护措施，既保护了您的数据的机密性、完整性和可用性，又保障了电子和物理存储的安全。所有数据都存储在经过积极维护的防火墙保护的服务器上，防病毒软件也随时更新以确保最新的保护机制生效。PayKka 将遵循最少且必要原则对您的个人数据进行访问、查询及处理，对应个人数据查看处理的权限亦会进行严密设置。除非获得您明确的授权同意，PayKka 不会主动共享、转让、委托处理、公开披露您的个人数据。

PayKka puts great emphasis on the security of your data. PayKka has established and adopted strict data information protection systems and security measures internally, which not only protects the confidentiality, integrity and availability of your data, but also ensures the security of electronic and physical storage. All data is stored on servers protected by actively maintained firewalls, and anti-virus software is always updated to ensure the latest protection mechanisms are in effect. PayKka will follow the minimum necessity principle to access, query and process your personal data, and the permissions for viewing and processing of personal data will also be strictly set. PayKka will not actively share, transfer, entrust processing, or publicly disclose your personal data unless you obtain your explicit authorization and consent.

当您提供纸质文件进行身份验证时，PayKka 会将其以电子方式存储。原件将被安全销毁或退还。

When you provide paper documents for authentication, PayKka stores them electronically. Originals will be securely destroyed or returned.

但请注意，您有责任保护您的帐户证书的安全，并且不与任何人共享。通过互联网传播信息始终存在风险，这些风险由您自己承担。PayKka 尽最大努力保护通过 PayKka 帐户传输的个人数据安全，采用了行业标准的国际数据安全标准（PCI-DSS）来辅助维护个人数据安全。

However, please note that you are responsible for keeping your account credentials secure and not sharing them with anyone. There are always risks associated with disseminating information over the Internet, which are entirely at your own risk. PayKka makes every effort to protect the security of personal data transmitted through PayKka accounts and adopts the industry-standard International Data Security Standard (PCI-DSS) to assist in maintaining personal data security.

此外，PayKka 的网站不定期会推广 PayKka 合作伙伴、广告客户和关联公司的网站链接。请注意，这些网站有自己的隐私政策，当您在向任何第三方提交用户个人数据之前，请先仔细查看相关政策，PayKka 对这些政策不承担任何责任。

In addition, PayKka's website may from time to time promote website links to PayKka's partners, advertisers and affiliates. Please note that these websites have their own privacy policies. Please check the relevant policies carefully before submitting user personal data to any third party. PayKka is not responsible for these policies.

## **11. 当隐私政策发生变更时 When the Privacy Policy changes**

PayKka 会根据法律、技术或业务发展的变化、新功能添加或根据利益相关者的建议，不定期更新隐私政策。我们通过在 PayKka 的网站上公布修订的隐私政策来通知您有关本隐私政策的任何更改。请定期访问该网站以获取最新信息。修改更新的隐私政策将再次征求您的确认与同意。我们会在网站上发布修订版本并提前 30 天通知生效日期，请您留意查阅。您如果选择仍然继续使用我们的产品和/或服务，您需要在发布政策更新通知生效日期前，在相关通知页面下方重新勾选确认您是否已充分知悉、了解并同意相关政策的更新与修订。请注意，一旦您勾选确认，这表示您同意更新后的隐私政策，并且同意我们按照最新的隐私政策收集、使用、保存和共享您的个人数据。如果您不同意接受最新的隐私政策，或对我们的隐私政策有任何疑问或需要进一步的帮助，请随时与我们联系。

PayKka will update the Privacy Policy from time to time based on changes in legal, technical or business developments, new feature additions, or based on suggestions from stakeholders. We will notify you about any changes to this Privacy Policy by posting the revised Privacy Policy on PayKka's website. Please visit the website regularly for the latest information. Modifications and updates to the Privacy Policy will require your confirmation and consent again. We will publish the revised version on the website and notify the effective date 30 days in advance, so please check it carefully. If you choose to continue using our products and/or services, you need to re-check at the bottom of the relevant notification page to confirm whether you have fully informed, understood and agreed to the updates and revisions to the relevant policies before the effective date of the policy update notice is released. Please note that once you check the box, it means that you agree to the updated Privacy Policy and agree that we collect, use, save and share your personal data in accordance with the latest Privacy Policy. If you do not agree to accept the latest Privacy Policy, or if you have any questions about our Privacy Policy or need further assistance, please feel free to contact us.

## **12. 如何联系 PayKka? How to contact PayKka?**

如果您对 PayKka 的隐私政策有任何疑问或意见，或者如果您想提出任何请求，请发送电子邮件至 [privacy@xgd.com](mailto:privacy@xgd.com)，与我们的隐私办公室联系，或者客户支持邮箱 [PaykkaSupport@XGD.com](mailto:PaykkaSupport@XGD.com)。我们的常驻地址是香港新界屯门海荣路 22 号屯门中央广场 11 楼 17 室。

If you have any questions or comments about PayKka's Privacy Policy, or if you would like to make any request, please contact our Privacy Office by sending an email to [privacy@xgd.com](mailto:privacy@xgd.com), or customer support email [PaykkaSupport@XGD.com](mailto:PaykkaSupport@XGD.com). Our permanent address is Room 17, 11/F, Tuen Mun Central Plaza, 22 Hoi Wing Road, Tuen Mun, New Territories, Hong Kong.