

Moomoo Crypto Inc. Privacy Policy - terms and agreements

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Welcome to Moomoo Crypto Inc.!

We have summarized key information on the personal data we process below. If you would like more detail on our processing activities, you can read on or click the hyperlinks below for our full privacy policy.

What information do we need to provide our Services?

If you register an account to use the Services or initiate a trade, then we will need some information from you in order to set up your account. If you contact our customer support, then we will also retain your contact information and any information in your support request so that we can address your query.

How will we use information?

We use your information to set up your account, process trades, and ensure the Services are operating properly.

Does Moomoo Crypto Inc. share information with third parties?

Our Services rely on certain third parties to ensure the best experience – including cloud services, identity verification and social media networks that you connect to your account. We also have affiliates around the world who work together to provide the Services. In some cases, if required by law or a judicial or enforcement order, we may be required to disclose certain information to government or judicial authorities.

Where is your information processed?

Our servers are located in California and Virginia. Our support teams, affiliates, and service providers are located around the world.

How long is information retained?

As a general rule, information is only retained for the period for which you have an account. In some cases, we may retain information after such time, for example where the law requires us to retain certain records.

What are my rights over my information?

Certain laws provide users with special rights – including the right to access, to correct, to delete, to transfer or to restrict how your information is used. You can read more about certain rights and how to get in touch with us below.

How can you manage and delete your account and/or information?

You may delete your Account at any time through Settings - Account & Security - Delete Account in the Moomoo App. You may instruct us to delete your data at any time by sending an email to support@moomoocrypto.com. We keep and safeguard your data until the data is no longer necessary for us to provide our Services, or until your account is deleted - whichever comes first. This is a case-by-case determination that depends on things like the nature of the data, why it is collected and processed, and relevant legal, compliance, or operational retention needs. When you instruct us to delete your data, you will no longer be able to access the Services. We will also, subject to our legal or compliance needs, delete things you have posted, such as your photos and comments, and you won't be able to recover that information later. Information that others have shared about you isn't part of your account and won't be deleted. You can contact us at any time by sending us an email at support@moomoocrypto.com.

How to get in touch with us

You can contact us at any time by sending us an email at support@moomoocrypto.com.

How will we notify you of changes?

Changes to this Privacy Policy will be posted here. Refer to UPDATES TO THIS PRIVACY POLICY section.

Moomoo Crypto Inc. and its respective subsidiaries and affiliates (collectively, the "Company", "we", "our" or "us") would like you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect:

- through websites operated by us from which you are accessing this Privacy Policy (the "Websites");
- through the software applications made available by us for use on or through computers and mobile devices (the "Apps");

- through our social media pages and apps (collectively, our "Social Media Pages"); and
- through HTML-formatted email messages that we send to you that contains a link to this Privacy Policy.

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the "Services".

If you do not agree to the processing of your personal information as described in this policy, please do not provide your information and stop using the Services. By using the Services, you are acknowledging that your personal information will be processed as described in this policy.

PROCESSING PERSONAL INFORMATION

The following sets out what personal information we process, the source of that information, and our legal basis for processing that information (applicable in certain jurisdictions which require a legal basis for processing).

We need to collect personal information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services.

Information	Purpose
Contact Information Name, Date of Birth, Postal Address, Telephone Number, Email address	To contact you regarding your account, including marketing.
Account Data Username (Moomoo ID or other identifier), password, account number, profile picture	To facilitate your use of the Services.
KYC Data Identification number, passport, driver's license or government-issued identity document, income and financial data	To verify your identity in accordance with legal obligations.
Bank Information Account number, credit / debit card number	To facilitate payments to and from your account.
Promotions & Sweepstakes If you participate in a promotion or sweepstakes, we may collect additional data as part of the promotion, which will be described in the relevant terms for such activity.	To facilitate the relevant activity and associated rewards.
Device identifiers IDFA and ADID	To facilitate ad attribution as part of our marketing campaigns.

Device identifiers

IDFV

To facilitate analytics and improvements for the service

IP Address

To determine your approximate location.

Location Data

Determined through GPS (with your permission), Wi-Fi network, wireless network triangulation.

To monitor the integrity of the Services to ensure the provision of the Services is secure and lawful.

Device Information

device type, OS name and version, screen resolution, platform type, device manufacturer and model, language settings, browser type and version, software name and version.

- This is used:
- to ensure the integrity and consistent operation of the Services;
- to protect our Services against cyberattacks, criminal activity, identity theft, or investigation of suspicious activity;
- to comply with our legal obligations, including as part of conducting routine audits of our Services;
- to enforce our terms and policies;
- to protect our users;
- to determine effectiveness of features and campaigns;
- to improve our Services; and
- for security and verification purposes.

Usage Information

Interactions with the Services (including photos or media uploaded)

Transaction Data

Transaction log, invoice/s, time and date.

To facilitate your trades and provide you with an historical log of such actions.

Customer Service Data

Account identifier, log data, email address (if you choose to disclose your email), details of request.

To respond to your support request.

If you disclose any Personal Information relating to other individuals to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

STORAGE OF PERSONAL INFORMATION

Our servers are located in California and Virginia. Our support team, affiliates, and third-party partners are based around the world, and may have access to certain personal information from to time in order to help provide the Services. In the case of transfers of personal information from the United Kingdom or European Union to third countries, we rely on the relevant standard contractual clauses to facilitate that transfer. Where other jurisdictions require that we enter into or use other lawful means to facilitate export, we implement appropriate safeguards to facilitate such transfer using lawful means. We will retain the personal information only for so long as it is required for the purpose

for which it was collected (unless we are legally required to retain it, in which case it will be retained for the relevant mandatory legal retention period).

SHARING OF PERSONAL INFORMATION

To the extent required for the supply of the Services, we will share certain personal information with the following:

- **our affiliates**— these entities process personal information as part of providing the Services and for the purposes described in this Privacy Policy;
- **third party service providers** – these include website hosting, data analysis, payment processing, trade clearing and settlement, information technology and related infrastructure provision, customer service, email delivery, auditing, targeted advertising identification and delivery, mailing service, tax and accounting services, contest fulfillment and other services in connection with the overall delivery of the Services;
- **third-party sponsors of sweepstakes, contests, and similar promotions**— if you choose to participate, your information will be shared to facilitate the relevant promotion, contest or sweepstake;
- **other users or members of the public**— if you post content to the forum or other message boards, within chat, on a profile page, to a blog, or any other services to which you are able to post information and content (including, without limitation, social media pages), then the information you post will be available to any person who can view that page or service. If you choose to share using your connected social media account, then your shared content will be visible to your friends, other users of the platform, and the social media account provider. If you choose to share information using the share function, you authorize us to facilitate the sharing of the information you have selected, and you understand that the use of shared information will be governed by the social media provider's privacy policy;
- **judicial authorities, law enforcement, regulators, courts, government authorities, and other parties where required for compliance with legal obligations** – there may be circumstances where we are legally required to disclose personal information to these entities, whether it be to comply with applicable law and regulations, to cooperate with an inquiry or investigation, to respond to subpoenas, court orders, legal process, law enforcement requests, and legal claims, to enforce our terms and conditions; or to protect our rights, privacy, safety or property, and / or that of our affiliates, users or the public.
- **in connection with a sale or business transaction**— we may disclose or transfer information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any

portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

We will not, however, share or sell users' mobile information (including name and mobile phone numbers) that is used for a 10DLC campaign to other parties for their marketing and/or promotional purposes.

USING COOKIES

Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We may also use cookies or other technologies in online advertising to track responses to our ads. We do not currently respond to browser do-not-track signals. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to [more information](#). If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

Using pixel tags and other similar technologies

- Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates. You may set your email [options](#) to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our email, used our Services, or performed certain functions with it.

Analytics

We may use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on

activities and trends. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the Services. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to [here](#), and opt out of them by downloading the Google Analytics opt-out browser add-on, available at [here](#).

Using Adobe Flash technology (including Flash Local Shared Objects ("Flash LSOs")) and other similar technologies

- We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also go to the Global Storage Settings Panel and follow the instructions (which would explain, for example, how to delete existing Flash LSOs (referred to as "information"), how to prevent Flash LSOs from being placed on your computer without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

IP Address

- Your IP address is automatically assigned to your devices by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Services. We may also derive your approximate location from your IP address.

Location Data

- We automatically collect location data when you visit our online Services. We collect information about your location through GPS, Wi-Fi, wireless network triangulation, or other methods in order to obtain your location. We may also approximate your location by your IP Address. We also use the Google Maps API to gather information about your location. Google uses various technologies to determine your location, including IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points, and cell towers (see Google Maps privacy policy to learn more).

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under any applicable law or regulation. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

SECURITY

We seek to use organizational, technical and administrative measures to protect personal information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

DATA SUBJECT RIGHTS

Users in some jurisdictions have rights afforded by law in relation to their personal information. A general overview of certain rights is set out below. Please contact us to confirm what rights apply to you and the location you are ordinarily resident in. You can contact us at any time at support@mooomoocrypto.com.

For your protection, we will only deal with requests relevant to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. Please note that in some countries, we cannot accede to your request if doing so involves us having to reveal personal information about another individual.

Please note that in some countries, we are entitled to charge a reasonable administrative fee for implementing or giving effect to your request.

RIGHT TO WITHDRAW CONSENT

Withdrawal of consent for use and disclosure of your Personal Information

You may have the right to withdraw your consent to some or all collection, use and disclosure of your personal information as described in this Privacy Policy upon giving us reasonable notice in writing of such withdrawal by contacting

us at support@mooomoocrypto.com. We will try to comply with your request(s) as soon as reasonably practicable.

Please note that, depending on the nature and extent of the withdrawal, you acknowledge that we may be unable to initiate or continue to provide Services to you, or administer any account(s) or relationship(s) in place upon the withdrawal of your consent. This may include the termination of any accounts, agreements and / or relationships that you may have with us.

All our legal rights and remedies are expressly reserved in the event of termination and any subsequent event. The withdrawal of consent shall not affect the lawfulness of any collection, use or disclosure of personal information which is not subject to consent, or for which we are otherwise legally permitted to retain.

Marketing

If you no longer want to receive marketing-related emails from us on a going-forward basis, you may also opt-out by using the **"Unsubscribe"** link that would always be contained in the marketing email or contact us at support@mooomoocrypto.com.

ACCESS AND CORRECTION

How you can access or correct your Personal Information

You may have a right to:

- request access to your personal information and receive information about how we have used or disclosed your personal information; and / or
- request that we correct any inaccuracies or incomplete information in your personal information.

If you would like to request to review or correct your personal information, you may contact us at support@mooomoocrypto.com or by going to Settings within the App.

We aim to ensure that your personal information is sufficiently accurate, complete and up to date, as provided by you, to minimize the possibility that inappropriate information may be used to make a decision about you or disclosed by us to a third party. In order to ensure that your personal information is current, complete and accurate, please notify us as soon as possible if any of the information that you have provided to us has changed.

If you tell us that any personal information about you that is held by us is inaccurate or incomplete, we will take appropriate action to amend the personal data as required and, if necessary, notify relevant third parties of the correction. Please note that we may need to retain certain information for recordkeeping purposes and / or to complete any transactions that you began prior to requesting a change (e.g., when you make a purchase or enter a promotion, you may not be able to change the Personal Information provided until after the completion of such purchase or promotion).

If you are a resident of California, under 18 and a registered user of the Services, you may ask us to remove content or information that you have posted to the Services by writing to support@mooomooocrypto.com. Please note that your request does not ensure complete or comprehensive removal of the content or information, as, for example, some of your content may have been reposted by another user.

THIRD-PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates. We strongly recommend that you review the terms and conditions and privacy policies of those third-party websites to find out how they collect, use and disclose your personal information.

In addition, please note that we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

THIRD-PARTY ADVERTISING

We use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

COOKIES

You may receive advertisements based on information relating to your access to and use of the Services and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags) that collects information about your use of the Services over time. They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. For advertising, we may share a common account identifier (such as an email address or user ID) or hashed data with our third-party advertising partners to help identify you across devices.

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the minimum age with capacity to consent to processing of personal information in each jurisdiction in which the Services are available, and we do not knowingly collect personal information from individuals under such age.

SENSITIVE INFORMATION

Unless we specifically request it, we ask that you not send us, and you not disclose, any sensitive personal information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background) on or through the Services or otherwise to us.

UPDATES TO THIS PRIVACY POLICY

We may review and update this Privacy Policy from time to time. The "LAST UPDATED" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. Please check back regularly for updated information on the handling of your personal information. Your use of the Services following these changes means that you accept the revised Privacy Policy.

CONTACTING US

If you have any questions about this Privacy Policy, or would like to exercise any of your rights, please contact us at support@mooomoocrypto.com.

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.

LANGUAGE

Except as otherwise prescribed by law, in the event of any discrepancy or inconsistency between the English version and local language version of this privacy policy, the English version shall prevail.

JURISDICTION SPECIFIC TERMS

Some jurisdictions' laws contain additional terms for users of the Services, which are set out in this section. If you are a user located in one of the jurisdictions below, the terms set out below under the name of your jurisdiction apply to you in addition to the terms set out in our Privacy Policy above.

California

This section applies to California residents covered by the California Consumer Privacy Act of 2018 ("**CCPA**").

Collection and Disclosure of Personal Information

Over the past 12 months, we have collected and disclosed the following categories of personal information from or about you or your device:

- Identifiers, such as your name as it appears on your social media profile, IP address, device ID, device token, phone number, mailing address, email address, and nickname. This information is collected directly from you and your device and from social media platforms if you choose to sign up using a social media account.
- Internet or other electronic network activity information, such as your information regarding your use of the Service, including date and time stamps of actions, log-in and Device Information as described in the main Privacy Policy. This information is collected directly from you and your device.
- Commercial information about any transactions within the Service such as what transactions were made and how much they cost. This information is collected directly from you and your device, and the Google Play or Apple iOS store.

- Geolocation data such as your region location when you set up your profile and choose to provide this information for the Service. This information is collected directly from you.
- Audio and visual information such as your social media profile picture, photos shared in the Service, and messages. This information is collected directly from you and from social media platforms if you choose to sign up using a social media account.
- Other information described in subdivision (e) of Section 1798.80, including information about your gender, nationality, or age. This information is collected directly from you in the context of being our consumer.

We collect your personal information for the following purposes:

- To provide you with the Service, maintaining your account, providing customer service, processing transactions, and facilitating use of forums.
- To improve our services, including the functionality of the Service.
- For security and verification purposes, including to prevent and detect fraudulent activity.
- To address and remediate technical issues and bugs.

For additional information about what each type of personal information is used for, see this chart in the main portion of the Privacy Policy.

We disclose personal information to the following types of entities:

- Other companies within our corporate group who process your personal information in order to operate the Service.
- Other companies that provide services on our behalf in support of the Service and who are prohibited by contract from retaining, using, or disclosing personal information for any purpose other than for providing their services to us.
- Regulators, judicial authorities and law enforcement agencies
- Entities that acquire all or substantially all of our business.

In the past 12 months, we have not sold Personal Information of California residents within the meaning of "sold" in the CCPA.

Rights under the CCPA

If you are a California resident, you have the right to:

- Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - other categories of personal information about you that we collected;
 - other categories of sources from which the personal information was collected;
 - other purpose for collecting personal information about you;
 - other categories of third parties to whom we disclosed personal information about you and the categories of personal information that was disclosed (if applicable) and the purpose for disclosing the personal information about you; and
 - other specific pieces of personal information we collected about you;
- Request we delete personal information we collected from you, unless CCPA recognizes an exception; and
- Be free from unlawful discrimination for exercising your rights including providing a different level or quality of services or denying goods or services to you when you exercise your rights under the CCPA.

We aim to fulfil all verified requests within 45 days pursuant to the CCPA. If necessary, extensions for an additional 45 days will be accompanied by an explanation for the delay.

How to Exercise Your Rights

First, you may wish to log into your account and manage your data from there. If you are a California resident to whom the CCPA applies, you may also exercise your rights, if any, regarding other data by contacting us at support@moomoocrypto.com.