

AIR TRANSLATOR PRIVACY POLICY

Air Translator (hereinafter referred to as "Air Translator", "we", "us" or "our") operates a mobile application and community marketplace that helps people form online translation relationships directly with one another, where they can find, list, and book translation services of any language around the world through our mobile application ("**Platform**"). Air Translator refers to Air Translator Ltd. and Air Translator (Beijing) Technology Ltd.

This Privacy Policy is intended to inform you about the binding legal rights and obligations between you and Air Translator the Platform. "User" means a person who registers, accesses, or uses the Platform. We reserve the right to modify the Agreement at any time and without prior notice. If you do not agree to any part of this Privacy Policy, we cannot provide the Platform or Service to you, and you should stop using the Platform and deactivate your account with Air Translator. You can find out more about how to deactivate your account via contacting our customer services.

DEFINITIONS

"**Aggregated Information**" means information about all of our users or specific groups or categories of users that we combine together so that it no longer identifies or references an individual user.

"**Data Controller**" means Air Translator, the company responsible for the use and processing of Personal Information.

"**Personal Information**" means information relating to a living individual who is or can be identified either from that information or from that information in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.

PERSONAL INFORMATION GATHERED BY AIR TRANSLATOR

1. Information that you provide us

We receive, store and process information that you make available to us when accessing or using our Platform and Services. Examples include when you:

1. fill in any form on the Platform, such as when you register or update the details of your user account, or when you supply language verification information;
2. access or use the Platform, such as to search for or list your languages, make, accept, or pay for translation requests, post comments or reviews, or communicate with other users;
3. link your account on a third party site (e.g. Facebook, WeChat) to your Air Translator account, in which case we will obtain the Personal Information that you have provided to the third party site, to the extent allowed by your settings with the third party site and authorised by you; and
4. communicate with Air Translator.

2. Log Data

We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the Platform, regardless of whether you are registered with Air Translator or logged in to your Air Translator account, such as your IP Address, the date and time you access or use the Platform, the hardware and software you are using, referring and exit pages and URLs, the number of clicks, pages viewed and the order of those pages, and the amount of time spent on particular pages.

3. Third-party social plugins

Our Platform may use social plugins which are provided and operated by third-party companies, such as Facebook and WeChat log in.

As a result of this, you may send to the third-party company the information that you are viewing on a certain part of our Platform. If you are not logged into your account with the third-party company, then the third party may not know your identity. If you are logged into your account with the third-party company, then the third party may be able to link information about your visit to our Platform to your account with them. Similarly, your interactions with the social plugin may be recorded by the third party.

Please refer to the third-party's privacy policy to find out more about its data practices, such as what data is collected about you and how the third party uses such data.

HOW AIR TRANSLATOR USES AND PROCESS THE INFORMATION THAT YOU PROVIDE OR MAKE AVAILABLE

We do not store credit card details nor do we share customer financial details with any 3rd parties. We use, store and process Information about you for the following general purposes:

1. to enable you to access and use the Platform;
2. to operate, protect, improve and optimise the Platform, Air Translator's business, and our users' experience, such as to perform analytics, conduct research, personalise or otherwise customise your experience, and for advertising and marketing;
3. to help create and maintain a trusted and safer environment on the Platform and Services, such as fraud detection and prevention, conducting investigations and risk assessments, verifying language certificates or documents provided by you, and conducting checks against databases such as public government databases;
4. to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
5. where we have your consent, to send you marketing and promotional messages and other information that may be of interest to you, including information about Air Translator or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications in your settings (in the "Account" section) when you login to your account;
6. to administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Air Translator or our business partners; and
7. to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

HOW AIR TRANSLATOR USES AND PROCESSES USER COMMUNICATIONS

We may, either directly or through third party companies and individuals we engage to provide services to us, review, scan, or analyse your communications with other users exchanged via the Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research and customer support purposes. For example, as part of our fraud prevention efforts, the Platform may scan and analyse messages to mask contact information and references to other websites. This helps to prevent fraudulent actors from asking Guests to send them money outside of the Platform, such as by bank transfer or

other money transfer methods. We may also scan, review or analyse messages for research and product development purposes to help make search, booking and user communications more efficient and effective, as well as to debug, improve and expand product offerings. We will not review, scan, or analyse your communications for sending third party marketing messages to you. We will also not sell these reviews or analyses of communications to third parties. We will also use automated methods to carry out these reviews or analyses where reasonably possible. However, from time to time we may have to manually review some communications. By using the Platform, you consent that Air Translator, in its sole discretion, may, either directly or through third party companies and individuals we engage to provide services to us, review, scan, analyse, and store your communications, whether done manually or through automated means.

WHEN AIR TRANSLATOR DISCLOSES OR SHARES PERSONAL INFORMATION, AND TO WHOM

We may transfer, store, use and process your information, including any Personal Information, to countries outside of the European Economic Area ("EEA") including the China. Please note that laws vary from jurisdiction to jurisdiction, and so the privacy laws applicable to the places where your information is transferred to or stored, used or processed in, may be different from the privacy laws applicable to the place where you are resident.

Your Personal Information may be disclosed as follows:

1. Parts of your public profile page that contain some Personal Information may be displayed in other parts of the Platform to other users for marketing purposes or to the extent necessary to operate and manage referral and rewards programs.
2. As a translator your public profile page will always include some minimum information such as the translator's location and language skills, self description, availability, public profile photo and ratings and reviews left by other users.
3. When you submit a request for translation, your full name will become visible to the Translator along with language requested. Once the Translator accepted your request you will be able to start the session using in-app text message, voice message, and video calls. Telephone numbers will be masked, you are responsible for other information during your conversation with each other.
4. When your request for a translation session is accepted by the Translator or when you accept a Users's request, we will disclose some of your Personal

Information to the Translator or the User. However, your billing and payout information will never be shared with another user.

5. We will ask the User to review the translation session. If you choose to provide a review, your review may be public on the Platform.

6. You may link your account on a third party social networking site to your Air Translator's account. We refer to a person's contacts on these third party sites as "Friends". When you create this linkage:

- some of the information you provide to us from the linking of your accounts may be published on your Air Translator account profile;
- your activities on the Platform may be displayed to your Friends on the Platform and/or that third party site;
- other Air Translator users may be able to see any common Friends that you may have with them, or that you are a Friend of their Friend if applicable;
- other Air Translator users may be able to see any schools, hometowns or other groups you have in common with them as listed on your linked social networking site(s); and
- the information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes.

The publication and display of information that you provide to Air Translator through this linkage is subject to your settings and authorisations on the Platform and the third party site.

7. We may also engage third party companies and individuals, who may be located outside of the EEA, to provide services to us, including but not limited to technology services and services to help verify your identification, to conduct checks against databases such as public government databases (where legally allowed), to otherwise assist us with fraud prevention and risk assessment, to assist us with customer service, and to facilitate the payments or reimbursements you request (such as Braintree and PayPal). We may provide Personal Information about you to these third parties, or give them access to this Personal Information, for the limited purpose of allowing them to provide these services. We do not store credit card details nor do we share customer financial details with any 3rd parties. We will ensure that such third parties have contractual obligations to protect this Personal Information and to not use it for unrelated purposes.

8. You acknowledge, consent and agree that Air Translator may access, preserve and disclose your account information and Collective Content if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to (a) respond to claims asserted against Air Translator; (b) to comply with legal process (for example, subpoenas and warrants); (c) to enforce and administer our agreements with users, such as the Terms of Service, and this Privacy Policy; (d) for fraud prevention, risk assessment, investigation, customer support, product development and de-bugging purposes; or (e) to protect the rights, property or personal safety of Air Translator, its users or members of the public. We will use commercially reasonable efforts to notify users about law enforcement requests for their data unless:

- providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; or
- based on information supplied by law enforcement, we, in our sole discretion, believe: (a) that providing notice could create a risk of injury or death to an individual or group of individuals, (b) that the case involves potential harm to minors, or (c) that harm or fraud could be directed to Air Translator, its Members, the Platform, or Services.

We may also publish, disclose and use Aggregated Information and non-personal information for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

BUSINESS TRANSFERS BY AIR TRANSLATOR

If Air Translator undertakes or is involved in any merger, acquisition, reorganisation, sale of assets or bankruptcy or insolvency event, then we may sell, transfer or share some or all of our assets, including your Personal Information. In this event, we will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.

HOW TO CHANGE OR DELETE YOUR INFORMATION, OR CANCEL YOUR AIR TRANSLATOR ACCOUNT

You may review, update, correct or delete the Personal Information in your Air Translator account. If you would like to correct your information or cancel your Air Translator account entirely, you can do so by logging in to your account or contact customer services. Please also note that any reviews and ratings posted by you may continue to be publicly available on the Platform in association with your first name, even after your Air Translator account is cancelled.

SECURING YOUR PERSONAL INFORMATION

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your Personal Information against unauthorised access, destruction or alteration. However, no method of transmission over the Internet, and no method of storing electronic information, can be 100% secure. So, we cannot guarantee the absolute security of your transmissions to us and of your Personal Information that we store.

CHANGES TO THIS PRIVACY POLICY

We may change how we collect and then use Personal Information at any time and without prior notice, at our sole discretion. We may change this Privacy Policy at any time. If we make material changes to the Privacy Policy, we will notify you either by posting the changed Privacy Policy on the Platform or by sending an email to you. We will also update the "Last Updated Date" at the top of this Privacy Policy. If we let you know of changes through an email communication, then the date on which we send the email will be deemed to be the date of your receipt of that email.