

## Privacy Policy

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Shanghai Yunzhou Information and Technology Ltd. (herein referred to as "ZStack Cloud", "we", "us", or "our", with a registered address at Room 502A, Building 4, No. 555 Dongchuan Road, Minhang District, Shanghai) has formulated this Privacy Policy regarding the use of ZStack Cloud's web pages (herein referred to as "Website", including the pages such as ZStack.io and its subpages with information, as well as the pages for submitting information such as "Registration", "Download", "Inquiry", etc.).

If a specific ZStack Cloud's product or service does not have a separate privacy policy or other rules for processing personal information, this Privacy Policy shall also apply to such product or service. If the product or service has a separate privacy policy or other rules on processing personal information, the privacy policy or other rules on processing personal information of the relevant product or service shall take precedence. In cases where this Privacy Policy stipulates content not covered by the privacy policy or other rules on processing personal information of the respective product or service, this Privacy Policy shall prevail.

Thank you for visiting ZStack Cloud Website! ZStack Cloud values your privacy and we appreciate your trust in ZStack Cloud.

This Privacy Policy (hereafter referred to as "Privacy Policy") explains the processing of your personal information (including but not limited to the collection, storage, use, processing, transmission, provision, publication, deletion, etc.) and shall specify your options and rights with respect to such personal information. Please read it carefully - it is important to understand how we collect and use your personal information and what you can do to control it. **Terms crucial to your rights and interests and personal information in this Privacy Policy will be highlighted in bold for your attention. Sensitive personal information that we collect will be additionally underscored to draw your focus.** If you do not consent to the way we process your personal information as described in this Privacy Policy, please do not provide your information when requested and stop using this Website.

### 1.How ZStack Cloud Collects and Processes Your Personal Information

(a) When you register, you are required to fill in and provide us with the **customer type (individual customer or enterprise customer), account information (including your real name, email address, phone number, verification code, and login password), and the information about the company you belong to (company name and your position in the company)**. After your registration is complete, you can log in to this Website to use our services through the phone number you submitted during registration. **We will send you an SMS verification code to verify your identity.**

When you register on our channel portal partner site as a partner, you are required to fill in and provide us with **your name, password, job title, company name**, province and city where your company is located, **verification code, email address, phone number, and ZStack inviter**. You can further choose to fill in other more information (including company registered capital, establishment time, intended partner industry, company website, and company introduction). When your registration is complete, you can log in to our services using your **account (email address) and password**.

(b) When you submit a product/document download request, we will collect **your name, company name, email address, and phone number** to contact you and process your request. The download link will be sent to your email. **We will send you an SMS verification code to verify your identity.**

(c) When you submit an application for a private cloud solution planning consultation, we will collect **your name, company name, email address, phone number, and the details of the solution you wish to discuss**. This information helps us understand your identity and industry needs, allowing us to contact you for further communication regarding your consultation. **We will send you an SMS verification code to verify your identity.**

(d) When you participate in research activities on this Website and complete the ZStack research questionnaire, we will collect **your name, company name, email address, phone number, and the content of the research questionnaire you fill out**. This information helps us understand your identity and industry needs, allowing us to contact you for a follow-up regarding the content of the research questionnaire you completed. **We will send you an SMS verification code to verify your identity.**

(e) When you inquire about ZStack certification training courses such as ZCCE or ZCCA, we will collect **your name, company name, email address, phone number, and the content of the certification training you wish to inquire about**. This information helps us understand

your identity and allows us to contact you to discuss matters related to the certification training course. **We will send you an SMS verification code to verify your identity.**

(f) When you need to apply for the activation code for ZStack certification training courses such as ZCCC or ZCCT to facilitate your course learning after successful activation, you can contact our staff for the application through the methods shown on this Website and submit your **application course, name, phone number, email address, city, and company name**. If you are a student, you need to provide us with **the name of your school, grade level, and major**. **We will send you an activation code after verifying your application information.**

(g) When you pass the training test and apply for a certificate jointly issued by ZStack & IIT Talent, we will collect **your name, phone number, email address, city name, company/school name, and type of certificate** in order to verify your application information and contact you to communicate with you about the issuance of the certificate. **We will send you an SMS verification code to verify your identity.**

(h) When you apply for product compatibility certification, we will collect **the contact name, company name, contact phone number, contact email address, certificate mailing address**, product name, product type, product architecture, product description, company logo, intended certified product, and evaluation methods. This information helps us understand your application details, and we will reach out to you to discuss certification matters.

(i) When you apply for a trial of our products (including advanced feature boards), in order to contact you and communicate with you about the product trial, we will collect **your name, company name, email address, phone number, and the problem or requirement you fill in that you would like to solve with us**. **We will send you an SMS verification code to verify your identity.**

(j) When you apply to become our training partner, we will collect **your name, phone number, email address, city, company name, position, and the cooperation intention you fill in**. This information is collected to understand your application details, and we will contact you to discuss matters related to your request to become a training partner. **We will send you an SMS verification code to verify your identity.**

(k) When you become our trial customer or paid customer, if you encounter product-related problems, you can create a ticket for consultation, for this, you need to fill in the ticket information (including the priority of the problem, ticket title, ticket type, product, details, confidential information, screenshots/log files, and attachments), **the name of the submitter**,

**the contact person's phone number**, the preferred contact time, **email address, and the company name**. We will assist you to solve the related problems after receiving your ticket.

(l) You can apply for reporting business opportunities through this Website, we will collect project information (including project name, expected date of signing orders, expected sales amount, project background, project requirements, project size, project phase, project plan, procurement methods, business opportunity sources, project follow-up, competitors), end-user information (including the end-user enterprise throughout the whole process, the province, the city, the first level of industry, secondary industry), **business opportunity contact information (including contact name, role, phone number, email address)** and other information (including **the person in charge of the designated business opportunity**, the name of the partner company, project background). We will review your business opportunity submission and contact you.

(m) When you submit an inquiry or request an appointment for communication or feedback through this Website, we will collect **your name, company name, email address, phone number, your needs or problems you wish to solve, and the content of your feedback**. In order to contact you and deal with your questions or needs. **We will send you an SMS verification code to verify your identity**. When you call our customer service phone for consultation, in order to help you solve the problem as soon as possible or record the handling of related issues and the results, we will keep **a record of the call** with you.

(n) For the purpose of recommending products or services to you, sending message notifications, providing information on marketing activities, we may, on our own or through the service providers we work with, push messages to you, including notifying you via SMS or phone calls based on **your phone number**, sending messages to **your email address**, and for this purpose, we may use the information you provide about **your name, company name, job title, email address, and phone number**.

(o) When you receive our invitation or you have the appropriate access, you can register to use our technical forum, where we will post solutions to technical problems and other content, which you can only view and download, but not post other information. For this purpose, we will collect and use **your user name, password, reason for registration, verification code and email address** when you register for the technical forum.

(p) You are fully aware that in the following circumstances, we do not need your authorization or consent to process your personal information:

i) Being necessary for the execution and performance of a contract to which you are a party

or for the implementation of human resources management in accordance with labor rules and regulations formulated in accordance with the law and collective contracts concluded in accordance with the law;

- ii) Being necessary for the performance of statutory duties or obligations;
- iii) Being necessary for coping with public health emergencies or for protecting the life, health and property safety of a natural person;
- iv) Processing personal information within a reasonable scope to carry out news reporting and supervision by public opinions for public interests;
- v) Process the personal information disclosed by individuals themselves or other legally disclosed personal information within a reasonable scope in accordance with the Personal Information Protection Law;
- vi) Other circumstances provided by laws and administrative regulations.

Personal information that has been anonymized is not considered personal information in accordance with the law, and such data will be processed without separate notification to you and without obtaining your consent.

## **2. How ZStack Cloud Delegates, Shares, Transfers, and Discloses Your Personal Information**

### **(a) Delegation**

We may authorize and delegate the processing of your personal information to trusted partners for the purpose of providing certain services or performing functions on our behalf. Such delegation is only carried out for lawful, legitimate, necessary, specific, and clearly defined purposes, as outlined in this Privacy Policy. Authorized partners will only have access to the information they need to carry out their responsibilities and will be asked not to use this information for any other purpose beyond the scope of the delegation. If an authorized partner uses your information for purposes we have not entrusted to them, they should obtain your consent separately. **We delegate the processing of information to authorized partners who support our business, such as providing data storage and ancillary services, as well as providing marketing services.**

### **(b) Share**

We will not share your personal information with any company, organization or individual other than ZStack Cloud, except for the following circumstances:

- i) Inform you of the name and contact information of the recipient, purpose and method of processing the information, and the type of personal information, and obtaining your separate consent in advance;

- ii) Provided in accordance with applicable laws and regulations, requirements of legal procedures, mandatory administrative or judicial requirements necessary;
- iii) Provided to the extent permitted by laws and regulations and necessary to safeguard ZStack Cloud, you or the public interest, property or safety from damage;
- iv) Only by sharing your information can we achieve the core functionality of our products and/or services or provide the services you require;
- v) To handle disputes or controversies between you and others for you upon your request;
- vi) Provided in accordance with the relevant agreements signed with you or other legal documents;
- vii) Used in the public interest in accordance with laws and regulations.

We may share your personal information with our affiliates. However, we will only share the necessary personal information and adhere to the purposes outlined in this Privacy Policy. Our affiliates will ask for your authorization to change the purposes for which personal information is processed.

#### **(c) Transfer**

We will not transfer your personal information to any company, organization or individual, **except in the following cases:**

If we need to transfer personal information due to merger, separation, dissolution, or being declared bankrupt, we will inform you of the name or name and contact information of the recipient. The receiving party shall continue to fulfill its obligations as a processor of personal information. In the event that the recipient changes the original purpose and method of processing, it shall obtain your consent again in accordance with the law.

#### **(d) Disclosure**

We will only disclose your personal information under the following circumstances and on the premise of adopting industry-standard security measures:

- i) According to your needs, we will disclose your specified personal information under the disclosure method that you have explicitly agreed to;
- ii) In accordance with the requirements of laws and regulations, mandatory administrative enforcement or judicial requirements.

**(e) Please understand that, in accordance with laws and regulations, if we need to share, transfer, disclose, or otherwise process your personal information based on the circumstances listed under paragraph (p) of Article 1 above, we do not need to obtain your consent.**

### **3.How ZStack Cloud Uses Cookie and Similar Technologies**

To enhance your browsing experience, when you visit this Website, we may use small data files to identify you. This helps streamline the process by eliminating the need for you to repeatedly enter registration information or assists in verifying the security of your account. These data files may be cookies, or other local storage provided by your browser or associated application (collectively, "cookies").

Please understand that certain services we offer are only available through the use of "cookies". If your browser or browser add-on service permits, you may modify your acceptance of cookies or reject ZStack Cloud's cookies on the relevant page, but this may in some cases affect your ability to use the services provided by ZStack Cloud Website.

### **4. How ZStack Cloud Protects Minors' Personal Information**

(a) Our products primarily target corporate customers, and we do not provide corresponding products/services for minors. Therefore, we do not actively collect personal information directly from minors. In cases where we collect personal information from minors with the consent of their guardians, we will only use, share, transfer, or disclose this information as permitted by law, with the consent of the guardians, or when necessary for the protection of minors.

(b) We place a high priority on the protection of minor's personal information. If you are under the age of 18, you should obtain your guardian's consent before using our products and/or services. We protect the personal information of minors in accordance with relevant national laws and regulations.

(c) If it is proven that a minor has registered to use our products and/or services without the consent of his/her guardian, we will consult with the guardian concerned and endeavor to promptly delete the relevant personal information.

(d) With respect to personal information of children under the age of 14 that may be involved, in addition to complying with the provisions regarding personal information specified in this Privacy Policy, we shall also adhere to the principles of appropriateness and necessity, informed consent, explicit purpose, security assurance and lawful use, and strictly comply

with the Provisions on the Online Protection of Children's Personal Information and other laws and regulations in storing, using, and disclosing the information. The retention period will not exceed the time necessary to achieve the processing purpose, and we will delete or anonymize children's personal information upon expiration. We will designate a dedicated person responsible for the protection of children's personal information and establish an Information Security Management Committee.

## **5.How ZStack Cloud Stores and Protects Your Personal Information**

We will retain your personal information only for the shortest period necessary for the purposes described in this Privacy Policy and as required by laws and regulations. Upon expiration of the retention period, we will delete or anonymize your personal information in accordance with the requirements of laws and regulations.

We store your personal information within the territory of the People's Republic of China, and our website maintenance and technical teams operate within the same jurisdiction. We strictly adhere to legal and regulatory requirements and implement rigorous security measures, as outlined in this Privacy Policy, to safeguard your rights.

We are committed to maintaining the security and integrity of your personal information. Our information security and access policies restrict access to our systems and technology, and we protect data through the use of technical safeguards such as encryption. Unfortunately, although we have implemented and maintain reasonable measures to protect your personal information, the transmission of information over the Internet is not completely secure. In the event of a security incident, such as a personal information breach, we will activate our emergency response plan to contain and mitigate the incident. We will promptly notify you through push notifications, announcements, or other means.

## **6. International Transfers**

If you are visiting our Website from outside Mainland China, please be aware that your information may be transferred to, stored in, and processed in Mainland China because our servers are located in Mainland China. The personal information protection laws and other laws in Mainland China may differ from the laws in your country, but please be assured that



we will process and protect your personal information in accordance with applicable personal information protection laws and this Privacy Policy.

## **7. Your Rights**

### **(a) Access to Your Personal Information**

You have the right to access your personal information. You can access your personal information by way of "login to the Website - My Account - Account Setting", unless otherwise provided by laws and administrative regulations.

### **(b) Copy and Transfer of Your Personal Information**

You have the right to copy your personal information. You can copy your personal information by way of "login to the Website - My Account - Account Setting".

You have the right to transfer your personal information. You may request to transfer your personal information to your designated personal information processor by sending an email to [huawu.li@zstack.io](mailto:huawu.li@zstack.io) and we will provide the method for transfer of information if it meets the conditions specified by the national cyberspace administration authority.

### **(c) Correction and Supplement of Your Personal Information**

You have the right to correct and supplement your personal information. When you find that the personal information we process about you is incorrect or incomplete, you can correct and supplement it by way of "login to the Website - My Account - Account Setting".

### **(d) Withdrawal or Change the Scope of Your Consent**

If we process your personal information based on your consent, you may withdraw or change the scope of your consent by sending an email to [huawu.li@zstack.io](mailto:huawu.li@zstack.io). Your decision to withdraw your consent or change the scope of your consent will not affect the previous processing of personal information based on your consent.

If you do not want us to send you marketing service information, etc. by phone, SMS, and/or mail, you may choose to unsubscribe from the SMS or request to cancel the marketing information notification service by sending an email to [huawu.li@zstack.io](mailto:huawu.li@zstack.io).

#### (e) Delete Your Personal Information

You may make a request to remove personal information by sending an email to [huawu.li@zstack.io](mailto:huawu.li@zstack.io). When you delete information from our service, we may not immediately delete the information from your backup system, but we aim to delete the information during the next backup update. If the retention period stipulated by laws or administrative regulations has not expired, or if the technical difficulties in deleting personal information persist, we will stop processing except for storage and taking necessary security measures.

#### (f) Cancellation

If you need to cancel your account, you may do so by sending an email to [huawu.li@zstack.io](mailto:huawu.li@zstack.io).

#### (g) Arrangements of Account Information Before Death

In accordance with applicable legal requirements, you have the option to make arrangements regarding your personal information in advance. You may inform us of your arrangements in writing through the contact details provided in this Privacy Policy; In the absence of alternative arrangements, your close relatives may, based on their legal and legitimate interests, exercise rights such as access, copy, correct, and delete relevant personal information left by you in accordance with relevant laws and the provisions of this Privacy Policy. The deceased user's next of kin may exercise these rights by emailing [huawu.li@zstack.io](mailto:huawu.li@zstack.io) to contact us.

#### (h) Responding to Your Above Request

For security reasons, we may ask you to verify your identity before processing your request. We will respond within 15 days. If you are not satisfied, you can also file a complaint by sending an email to [huawu.li@zstack.io](mailto:huawu.li@zstack.io).

For your reasonable requests, we do not charge fees in principle, **but for repeated requests exceeding reasonable limits, we will charge a fee for certain costs, depending on the circumstances. We may refuse requests that are unnecessarily repetitive, require excessive technical skill (for example, to develop a new system or fundamentally change existing practices), pose a risk to the legal rights and interests of others, or are highly impractical (for example, involving the provision of information on backup tapes).**

## **8. Changes**

Our Privacy Policy is subject to change. We will not diminish any of your rights under this Privacy Policy without your express consent. We will post any changes to this Privacy Policy on the relevant pages of this Website.

## **9. Contact and Complaint**

(a) If you have any questions, complaints, reports, comments, or suggestions concerning matters relating to this Privacy Policy or your personal information, please contact us at our hotline at 86-400-962-2212.

(b) We have established a personal information protection officer who can be contacted by sending an email to [huawu.li@zstack.io](mailto:huawu.li@zstack.io).

(c) Normally, we will reply to you within 15 working days. If you are not satisfied with our reply, especially if our processing of personal information has damaged your legitimate rights and interests, you can also complain or report to the supervision departments of cyberspace, telecommunication, public security, and industry and commerce.