

ALIBABA GROUP PRIVACY POLICY AND COMPLIANCE RULES

A. Purpose and Basis

In order to fully protect users' personal information, and to ensure that the Privacy Policies of the Internet-based Products and Services operated by Alibaba Group Holding Limited and its consolidated subsidiaries and affiliates (hereinafter referred to as "Alibaba") are compliant with applicable laws and regulations, Alibaba hereby formulates the Privacy Policy And Compliance Rules (the "Rules") in accordance with applicable laws, regulations, and requirements of regulatory authorities.

B. Basic Definitions

1. Internet-based Products and Services

"**Internet-based Products and Services**" refer to the products and services operated by Alibaba that satisfy the specific needs of users, including but not limited to websites, applications, SDK, applets, intelligent devices, etc., hereinafter referred to as "Products".

"**Functional Changes of Products**" refers to the adjustment and change of the functions of the Products, resulting in significant changes of the scenarios, types, purposes, means, and scope of the collection and use of personal information.

2. Privacy Policy

"**Privacy Policy**" refers to a set of personal information processing rules for Products involving the collection, use, and processing by other means of users' personal information, which should be formulated and publicly disclosed in accordance with applicable laws, regulations, and requirements of regulatory authorities where the Products or Services are operated and provided. Privacy Policies should be formulated for Products and Services for both individual and business users.

"**Children's Privacy Policy**" refers to a set of rules for the processing of children's personal information for Products involving the collection and use of children's personal information, which should be formulated and publicly disclosed in accordance with applicable laws, regulations, and requirements of regulatory authorities where the Products or Services are operated and provided.

C. Fundamental Principles of Privacy Protection

The Privacy Policy for Products of Alibaba shall be formulated in accordance with the following fundamental principles:

1. Clear Purpose

The processing of personal information through or involved in Products shall be for explicit, clear and specific purposes.

2. Informed Consent

Users shall be informed of the purposes, means, and scope of the processing of personal information before such processing through or involved in Products takes place. Users' explicit consent is required when the processing of the users' personal information relies on users' consent as the lawful basis.

3. Minimization and Necessity

The processing of personal information through or involved in Products shall be limited to the minimum types and amount of personal information necessary to achieve the stated purposes of such processing.

4. Openness and Transparency

The purposes, uses, means, scope and other rules of personal information processing through or involved in Products shall be published in a clear, explicit, straightforward and convenient manner. Products are subject to the supervision of users and the society.

5. Safety and Reliability

Products shall be devised with security capabilities commensurate to the security risks they face, and adequate managerial and technical measures should be adopted to ensure the confidentiality, integrity and availability of users' personal information.

D. Compliance Requirements for Privacy Policy

1. Release of New Products or New Functions of Products

1.1 Before the release of new Products or new functions of Products, it is necessary to check whether collection, use or processing by other means of users' personal information is involved. If so, the Privacy Policy should be formulated or modified prior to the official release.

1.2 The contents of the Privacy Policy shall meet the following requirements:

- (1) The text is concise, clear and straightforward;
- (2) Terms prohibited in contracts shall also be prohibited in the Privacy Policy; unreasonable exclusion of the legitimate rights and interests of users shall be prohibited;
- (3) In case of providing Products serving a large number of users, a highlighted and concise summary of the Privacy Policy shall be provided to users in order to facilitate users' understanding of the key contents.

1.3 The personal information processing rules in the Privacy Policy shall accurately reflect the way that personal information is processed through the functions of Products, and shall meet the following requirements.

- (1) Clarify the business functions of Products, and enumerate the types of personal information collected and used through the functions of Products;
- (2) Clarify the sensitive permissions of the operating system for which Products may apply, and their corresponding business scenarios;
- (3) Clarify the retention period of personal information, or the method of determining the retention period;
- (4) Clarify the SDK embedded in Products and the purposes for collecting and using personal information through such SDK;
- (5) Clarify the information of third-parties receiving the personal information and types and purposes of the personal information shared, and clarify that the third-parties will process the personal information in accordance with the aforementioned scope, and in case of any changes of circumstances, the third-parties shall re-obtain the consent of users;
- (6) Clarify the compliance scheme for users to exercise personal information rights under applicable laws, such as the right to access, correct, supplement, copy, transfer, delete, and withdrawal of consent (if the lawful basis is users' consent) in relation to their personal information;
- (7) Clarify the name of the operating parties of Products and the contact information of the person in charge of personal information protection, and promptly respond to complaints, reports and inquiries related to users' personal information protection;
- (8) Clarify the measures adopted by the operating parties of Products regarding the

protection of personal information, including relevant technical safeguard measures, and measures to respond to personal information security incidents, including measures to notify affected individuals according to applicable laws and regulations.

1.4 Obtaining users' consent to interactions through Products via the Privacy Policy shall meet the following requirements.

(1) Consent to the Privacy Policy shall be made by users through actively clicking on the pop-up window of the Privacy Policy or checking the consent box to acknowledge relevant agreements; checking by default is prohibited;

(2) For Products that may provide services without collecting personal information, a visitor mode that allows users to browse without consenting to the Privacy Policy should be provided, and users should not be forced to consent to the Privacy Policy;

(3) Once refusing to consent to the Privacy Policy, users shall be provided with the option to exit the Product;

(4) Privacy Policy should be publicly available and easily accessible.

2. Functional Changes to Products

2.1 Users' consent shall be re-obtained when the Functional Changes to Products result in the following significant changes to the Privacy Policy:

(1) The business mode of Products has changed significantly. For example, the purposes of processing personal information, the types of personal information being processed, and the means of using personal information, etc., have changed;

(2) The subject of the Privacy Policy, i.e., the operating party of the Product, has changed due to business adjustment, bankruptcy, or merger and acquisition, etc., and the new operating party changes the original purposes and/or means of processing;

(3) The main object of the sharing or public disclosure of personal information has changed;

(4) Users' personal information rights and the means to exercise such rights have changed significantly;

(5) Personal Information Protection Impact Assessment Report indicates that Products have had a significant impact on the rights and interests of individuals.

2.2 In case of Functional Changes of Products, the Privacy Policy shall be reviewed and updated promptly according to the situation upon release of the updated Products.

2.3 The formulation of and significant updates to the Privacy Policy shall comply with the following procedural requirements:

(1) There should be a special section within Products to publish the changes to the Privacy Policy for users' reference; alternatively, users shall be notified through internal letters, message notifications, etc.;

(2) In order to facilitate the participation of and supervision by users, when revisions to the Privacy Policy have a significant impact on the rights and interests of users, the opinions of users shall be consulted through public announcements or other means;

(3) In order to ensure that users can easily access to and save the historical versions of the Privacy Policy, there should be a section within Products to display the historical versions of the Privacy Policy; alternatively, links to access the historical versions shall be integrated into the Privacy Policy.