

# Privacy Policy

## *Important Note:*

Coohom Inc. and its affiliates (collectively “we”, “us” or “**Coohom Group**”) respect and protect user privacy. We may collect and use your personal data when you use features and services of Coohom Platform (the “**Coohom Platform**”)

Please read the following content very carefully. If you have any doubt about this Privacy Policy, please send emails to the Coohom support team via [support@coohom.com](mailto:support@coohom.com).

By using or continuing to use our services, you acknowledge and accept the current contents of the Privacy Policy and the contents that may be updated at any time.

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## **1. Scope of Application**

All products and services of the Coohom Platform are subject to this Privacy Policy. If certain products or services require specific privacy policies, we will explain to you before providing these products or services.

We take the protection of your privacy and personal data very seriously. We collect, store and use your personal data strictly in compliance with this Privacy Policy and with the applicable data privacy laws and regulations, especially the General Data Protection Regulation (“**GDPR**”).

This Privacy Policy does not apply to products or services that are accessed through our products or services and that are provided to you by third parties, such as third-party websites displayed in our products or services. It is important to note that when you use a third-party product or service, your personal data protection shall apply to that third party's privacy policy.

## **2. Personal Data We May Collect & How We Use Your Data**

Your personal data may be collected, stored, and used when we provide services. If you do not provide relevant personal data, you may not be able to register as a user or enjoy some of the services we offer, or you may not be able to achieve the desired results of the services.

### **2.1. Registration**

You can register to use certain features on our website. You have to provide the data requested during the registration process, for example user name, e-mail address and occupation. As part of the registration process, we seek your consent to use the data.

We use your personal data to help you to complete user registration and provide you with products or services. For users who live in the European Economic Area (“**EEA**”) or countries which request the disclosure of legal basis, the legal basis for processing the registration data is the intention of fulfilling or initiating a contractual relationship with us pursuant to Article 6 (1) b) of the GDPR or other applicable laws. The mandatory information requested as part of the registration process is required to fulfill or initiate a contract with us for specific services.

A user account will be created for you when you register. We will retain the data in the user account until you request us to delete your account.

### **2.2. Account settings**

You can set your avatar, name, address and decide whether to receive email notifications in account settings.

We use your personal data to help you to complete account settings. For users who live in the EEA or countries which request the disclosure of legal basis, the legal basis for processing your data is your consent pursuant to Article 6 (1) a) of the GDPR or other applicable laws.

If you do not agree to this processing, please don't set your account of Coohom Platform.

This data is only saved as long as your account exists, after which it will be deleted or anonymized.

### **2.3. Real-name authentication**

In order to protect your legal rights and transaction security, we may ask you to provide more authentic identity information including your real name, ID number, date of birth, when you use specific products or services of Coohom Platform (such as purchasing products or services, paying, creating a homepage, etc.) for real-name authentication.

For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing your data is the intention of fulfilling or initiating a contractual relationship between you and payment service providers, pursuant to Article 6 (1) b) of the GDPR or other applicable laws.

This data is only saved as long as your account exists, after which it will be deleted or anonymized.

## **2.4. Payment service**

Every time you pay for upgrade plan of Coohom Group, payment service providers will collect your name on card, credit card number, card expiry, CVC, price of the service you purchase, whether the payment has been completed. The payment service provider is Stripe Inc.

Payment service providers use your personal data to enable you to pay online for your convenience. Also, by collecting your payment data, you can easily get your refund. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for this is the intention of fulfilling or initiating a contractual relationship between you and payment service providers, pursuant to Article 6 (1) b) of the GDPR or other applicable laws.

Further information on the processing of data by Stripe, as well as on your rights and options for privacy, can be found at: <https://stripe.com/en-nl/privacy>.

## **2.5. Design tools**

Every time you do designs by using models on Coohom Platform, the model uploaded by you, the number of your clicks of design tools, the time of your clicks of design tools, templates used by you, your search of floor plan, rendering request, the last version of design, your UserID ("**design data**") will be collected.

We use your design data to help you to use our Coohom Platform to do designs. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing your data is the intention of fulfilling or initiating a contractual relationship between you and us, pursuant to Article 6 (1) b) of the GDPR or other applicable laws.

This data is only saved as long as your account exists, after which it will be deleted or anonymized.

## **2.6. Project management**

Every time you manage your assets, your products' names, client, location, time of creation, deadline, project brief, project size, number of models, number of reviews, number of assets, number of total 360, tags and team members of the project will be collected.

We use these data to help you to manage design assets online, and with this function, you can easily manage your products and increase your productivity. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing your data is the intention of fulfilling or initiating a contractual relationship between you and us, pursuant to Article 6 (1) b) of the GDPR or other applicable laws.

This data is only saved as long as your account exists, after which it will be deleted or anonymized.

## **2.7. Display tools**

Every time you use the display tools (such as Photo & Video Studio and 3D Viewer & AR), the model uploaded by you, the number of your clicks of design tools, the time of your clicks of design tools will be collected.

We use this data to help you use display tools of Coohom Platform. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing your data is the intention of fulfilling or initiating a contractual relationship between you and us, pursuant to Article 6 (1) b) of the GDPR or other applicable laws.

This data is only saved as long as your account exists, after which it will be deleted or anonymized.

## **2.8. Demo request & consultation scheduling**

When you request demo of Photo & Video Studio or 3D Viewer & AR, or schedule consultation about business accounts on Coohom Platform, your name(s), business mail, company name, country/region, the information you are looking for will be collected.

We use this data to contact you and provide you with demo and information about business accounts. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing your data is your consent pursuant to Article 6 (1) a) of the GDPR or other applicable laws.

If you do not agree to this processing, please don't request demo or schedule consultation about business accounts on Coohom Platform.

This data is only saved as long as your account exists, after which it will be deleted or anonymized.

## **2.9. Help center**

Every time you use help center to find answers to questions about Coohom Platform, we will collect your questions and your clicks of the sample answers.

We use your personal data to help you to solve your problems and provide supporting documents to you. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing your data is the intention of fulfilling or initiating a contractual relationship between you and us, pursuant to Article 6 (1) b) of the GDPR or other applicable laws.

This data is only saved as long as your account exists, after which it will be deleted or anonymized.

## **2.10. Newsletter**

When you register for our e-newsletter, your email address will be used for our promotional purposes until you unsubscribe. You will regularly receive information via email in this regard on current topics as well as emails for specific events and special promotions. The emails may be personalized and individualized based on the information saved about you.

In addition, we process the following data in relation to the use of the newsletter: the email program you are using, your browser's operating system, the time of access, and your abbreviated IP address. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing your data is your consent pursuant to Article 6 (1) a) of the GDPR or other applicable laws.

If you do not wish to receive this information, we will also provide you with the method to cancel such an information subscription with an unsubscribe link contained in every newsletter. But you will not be able to cancel the subscription of the information that is related to the system service and is not a promotion advertisement. For example, a notification sent to you by Coohom Group due to the service suspension caused by system maintenance.

### **2.11. Stability of Coohom Platform**

Every time you use Coohom Platform, we collect your log information, details of your activities when you use the Coohom Platform, records of your browsing and purchasing activities on Coohom Platform including but not limited to IP addresses, browsing patterns, and user behavioral patterns, statistical information about our Coohom Platform and visitors to Coohom Platform which includes but not limited to IP addresses, browser software, operating system, software and hardware attributes, pages viewed, a number of sessions, and unique visitors (“**operating data**”).

The log information is technical information that the system may collect through cookies, web beacons, or other means when using our products or services, including device information (such as your hardware model, operating system version, device configuration, unique device identifier, etc.), geographic location information, device connection information (e.g., browser type, telecom carrier, language, etc.), and device status information (e.g., device sensor data, etc.).

We use this operating data to to identify and resolve errors, to determine the stability of the website in different browsers and operating systems, and to make adjustments or improvements. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for processing the operation data is that we have a legitimate interest in processing data pursuant to Article 6 (1) f) of the GDPR or other applicable laws.

Your operating data will only be saved for the time as long as your account exists, after which they will be deleted or anonymized.

### **2.12. Data analysis**

It's also important to note that we allow third party to conduct behavioral tracking. Every time you visit our Coohom Platform, we will use Mixpanel and Segment to collect your IP address, the request from your browser as well as the time this request was made, product and version information about the browser used, the operating system of your devices.

Mixpanel uses your personal data to analyse your behavior tracking and help us to improve our website in order to better serve you. For users who live in the EEA or the countries which request the disclosure of legal basis, the legal basis for data analysis is that we have a legitimate interest in processing data pursuant to Article 6 (1) f) of the GDPR or other applicable laws.

Further information on the processing of data by Mixpanel and Segment, as well as on your rights and options for privacy, can be found at: <https://mixpanel.com/legal/privacy-policy/> and <https://segment.com/legal/privacy/>.

**Special note:**

(1) Some of your personal information, such as religious belief, biometric information, health, and medical information, may be considered sensitive personal information. Uploading, providing, or posting this information on Coohom Platform will result in someone being aware of your sensitive personal information, so please be cautious.

(2) You may terminate the collection of your information by turning off the location function, rejecting the cookie, etc., but you may not be able to acquire the related service or the effect that the related service is intended to achieve.

### **3. Description of Information Collection Methods Such As Cookies**

Coohom Group may collect and use your information through cookies, web beacons, etc., and store this information as log information. You may choose to refuse cookies by modifying your browser settings, but you may not be able to sign in or use Coohom services or features which rely on cookies. For more information about cookies and how we use them, please read our Cookie Notice.

We use our own cookies, web beacons, etc. to collect information for providing you with better services. Its main purpose is to: identify and remember your user identity; save the user preferences and other information you provide to us; analyze your use of our services and your activity preferences; optimize our ads to serve more personalized ads.

### **4. Your Rights and Contact**

We take great care to ensure that the processing of your personal data is explained as transparently as possible and that you are also informed about your rights. Should you require more detailed information or want to exercise the rights to which you are entitled, you can contact us at any time so that we can take care of your request.

#### **4.1. Rights of data subjects**

Subject to possible restrictions under national laws, as a data subject, you have the right to access, rectification, erasure, restriction of processing, objection to a decision based solely on automated processing, data portability and not to be discriminated with regard to your personal data. In addition, you can withdraw your consent and object to our processing of your personal data on the basis of our legitimate interests. You can also lodge a complaint with a supervisory authority. Details are as follows:

(1) You can **withdraw your consent** to the processing of your personal data by us at any time. As a result, we may no longer process your personal data based on this consent in the future. The withdrawal of consent has no effect on the lawfulness of processing based on consent before its withdrawal.

(2) You have the right to obtain **access** to your personal data that is being processed by us. In particular, you may request information on the purposes of the processing, the categories of personal data concerned, the categories of recipients to whom the personal data have been or will be disclosed, the envisaged period for which the personal data will be stored, the existence of the right to request rectification or erasure of personal data or restriction of processing of personal data or to object to such processing, the right to lodge a complaint with a supervisory authority, any available information as to the personal data's source (where they are not collected from you), the existence of automated decision-making, including profiling and, where appropriate, meaningful information on its details. Your right to access may be limited by national laws.

(3) You have the right to obtain from us without undue delay the **rectification** of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

(4) You have the right to obtain from us the **erasure** of personal data concerning you, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest or for the establishment, exercise or defence of legal claims. The right to erasure may be limited by applicable national laws.

(5) You have the right to obtain from us **restriction of processing** to the extent that the accuracy of the data is disputed by you, the processing is unlawful, but you oppose the erasure of the personal data, and we no longer need the data, but you need it to assert, exercise or defend legal claims or you have objected to the processing.

(6) If your personal data is processed on the basis of our legitimate interests, you have the **right to object** to the processing of your personal data on grounds relating to your particular situation. This also applies to profiling. If your personal data is processed by us for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

(7) You have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (“**right to data portability**”).

(8) You have the right to **object to a decision based solely on automated processing**, including profiling, except that the decision is necessary for entering into, or performance of, a contract between you and us, except that the decision is authorised by applicable laws which lay down suitable measures to safeguard your rights and freedoms and legitimate interests, or except that the decision is based on your explicit consent.

(9) We will **not discriminate against** any user for exercising their rights under applicable laws and this Privacy Policy.

## **4.2. Exercise of rights**

You have the right to exercise your rights. Coohom Group is doing everything possible to ensure that you can successfully exercise your rights in accordance with the laws and regulations. When you need to exercise your rights, we may ask you to authenticate to protect your personal data. If you have any questions regarding the Privacy Policy or you have a problem exercising your rights, you may send your request in writing to support@coohom.com.

We reserve the right to charge you a reasonable fee for the processing of any data access or correction request where requests are manifestly unfounded or excessive, in particular because of their repetitive character.

## **4.3. Data protection officer and contact**

We have appointed a data protection officer to support us in relation to data privacy issues and with whom you can also make contact directly. Our data protection officer is available to you to deal with queries relating to our processing of personal data or to provide other information on data privacy issues. We will respond to your requests within one month or two months (if the request is complex or you have made a number of requests).

### **Data Privacy Contact**

Phone: [+86 0571-28274566]

E-mail: [support@coohom.com]

## **4.4. Complaints**

If you are of the opinion that the processing of your personal data by us is not in compliance with this Privacy Policy or the applicable data protection regulations, you have the right to make a complaint to a regulatory authority. You can also make a complaint to support@coohom.com. We will then check the matter and inform you about the outcome of the investigation.

## **5. The Methods We Retain, Store and Protect Your Personal Data**

Your personal data we collect will remain on the server located in the United States. This information and materials may be sent to, accessed, stored, and displayed in your country, region, or location where Coohom Group collects information and materials.

We always delete your personal data as soon as the reason for storing it no longer applies. The data may remain stored beyond this period if this is provided for due to legal requirements to which we are subject, for example in respect of legal retention or documentation obligations. In such an event, we delete your personal data once the requirements cease to apply.

We attach great importance to information security and have established a dedicated technical team to establish systems and procedures that comply with data security technology standards. In addition, we also stick to protect your personal data from being accessed, used, or disclosed by unauthorized access through multiple measures such as access control and security incident handling. But please understand that the rapid development of Internet technology and possible malicious attacks may make the 100% information security impossible, and there may occur some security issues beyond our control. In the event of such problems, we will do our utmost to dispose of security incidents in a timely manner. As one of the preventive measures in advance, we also remind you to strengthen the security of your accounts and information by using more complicated passwords and change it regularly, carefully disclose your personal sensitive information, and pay attention to the settings of device permissions when replacing devices. We will also remind you of new security attacks and precautions in the form of occasional notifications, therefore you shall pay close attention to these notifications.

## **6. How We May Share or Disclose Your Personal Data**

We may share your personal data with third parties in the following cases:

- (1) In order to achieve the objectives listed in Article 2, we will share your personal data with our affiliates based on the principle of necessity in order to improve the quality of products and services;
- (2) In order to comply with the requirements of any applicable laws and regulations, court decisions or judgments, or mandatory requirements of government agencies;
- (3) In order to identify, prevent or deal with fraud, security or technical issues; and

Your personal data shall only be transferred if you have given your consent to do so, or if we are entitled or obliged to do so due to legal regulations and/or official or judicial orders. This may especially involve the provision of information for law enforcement purposes, for averting danger, or for enforcing intellectual property rights.

We may conduct statistics and analysis on the use of products and services. We may share these statistics with the public to demonstrate the overall usage trends of our services or provide these analysis results to our advertisers and third-party partners for advertising services. In any case, the statistics will not contain any personal data.

**Further Remind You to Pay Attention to the Published Shared Information:** As long as you do not delete the published shared information, the information will remain in the public domain; even if you delete the shared information, the information may be cached, copied, or stored independently by other users or third parties which are not under our control or saved by other users or such third parties in the public domain. Therefore, please carefully consider whether the information you post contains your personal data that you do not want to be known before the information is released. If it is included, please do not upload, publish, or share this information.

## 7.How We May Transfer Your Personal Data Across the Border

We will not transfer your personal data to our affiliates and service providers in third countries without your consent, except in the following cases:

(1) We may entrust Qunhe China to process your rendering requests, UserID, designing scheme and models, because they could provide assistance in the rendering. If you are contacts of enterprises which order the services provided by us, we may also entrust Qunhe China with your name and phone number for order management. We may also entrust Qunhe China with your account ID, password, email, user name, occupation, name, country, state, city and location, account type, plan ID, plan description, plan amount, plan currency, UserID, and subscription content for the purpose of data analysis. Our Affiliates will take organisational and technical measures to safeguard your personal data and never use your personal data in contraction to this Privacy Policy. This data is only saved by Qunhe China as long as your account exists, after which it will be deleted or anonymized.

(2) We may entrust Amazon Web Services, Inc (“**AWS**”) to store and backup your personal data, including your UserID, GatewayID, email, password, occupation, account name, first name, last name, country, state, city, location, user status, the time of the creation of your account. AWS is our service provider which is located in Singapore. It will take organisational and technical measures to safeguard your personal data and never use your personal data in contraction to this Privacy Policy. This data is only saved by AWS as long as your account exists, after which it will be deleted or anonymized.

Insofar as we transfer your personal data ourselves or through service providers to countries outside the EEA, we shall comply with the special provisions of Article 44 of the GDPR in this respect and shall similarly ask for our service providers to comply with these regulations. We shall therefore only transfer your data to countries outside the EEA subject to the level of protection assured by the GDPR. This level of protection is assured

especially through the use of standard contract clauses in accordance with Article 46 (2) c) of the GDPR;

## **8. Third-Party Social Media or Other Services**

You can sign in to our services through third-party social media (Facebook, Google, etc.), and we also provide you with the feature of sharing your content to social media or other services provided by third parties (such as Facebook and other social media and networks); we will also provide you with links through advertisements or other means of our services, allowing you to access third-party services or websites. The process of using these services may result in the collection of your personal information.

In view of the fact that these third-party social media or other services are operated by third parties, when you use services operated by third parties, you are required to accept the Terms of Service and Privacy Policy of third parties. Therefore, we strongly recommend you to read their terms and conditions carefully.

This Privacy Policy only applies to the information collected by Coohom Group and does not apply to any services or information usage rules of third parties. We are not responsible for the use of your information by any third party.

## **9. Personal Data Protection for Minors**

We attach great importance to the protection of information about Minors. If you have not reached the age of majority under applicable jurisdiction, we encourage you to ask your guardian to read this Privacy Policy carefully, and use our products or services, or provide us with your personal data with the consent of your guardian.

If a minor under applicable jurisdiction has provided us with personal information without guardian consent, the guardian should contact us to remove the information. you may send your request in writing to [support@coohom.com](mailto:support@coohom.com).

## **10. Supplementary**

The effective date of this Privacy Policy is indicated at the top of this Privacy Notice. The Privacy Policy shall remain in force for a long period of time, the effect from the time you confirm your acceptance, or from the time you use this Service in any way, whichever comes first.

Any changes to this Privacy Policy will be communicated by us posting an amended Privacy Policy on the Coohom Platform. Once posted on our Platform, the new Privacy Policy will become immediately effective. You agree that any information we hold about

you (as described in this Policy and whether or not collected prior to or after the new policy became effective) will be governed by the latest version of our Privacy Policy.

Last updated: April 23,2021