

Special Privacy Policy for Children

Latest update: Jan 2020

You and your child are seen to have accepted this *Special Privacy Policy for Children* (hereinafter referred to as “this Policy”) as long as you use this APP. This Policy may be revised so please do consult it regularly to know all revised contents. Once we revise it substantially, we will send you a timely notice. You and your children are seen to have accepted the revisions if continuing to use this APP.

This APP is operated by Oceanhigh Ltd. (hereinafter referred to as “BEJOINT” or “us”). We respect the privacy right of minors under 14 (“children”) and acknowledge the importance of providing a safety environment for child visitors. We have adopted special online privacy protection policy for children (“Special Privacy Policy for Children”), which guides us how to collect, store and use child visitor’s information that child visitor and his/her guardian provides for us. This Policy elaborates how we protect the privacy right of online child visitor and may not apply to the information we collect offline. We adopt this privacy protection measure voluntarily, in order to protect the privacy right of your child, and all our websites meet the existing online information collection and use criteria. For any matters not mentioned herein, *BEJOINT Privacy Policy* shall prevail.

For any question, complaint, report or opinion about statement or policy for children’s privacy protection, please feel free to contact us via sayhi@bejoint.com.

Personal Information We Collect

We will collect the personal information that you or your child submits voluntarily and usually by one of the following means (the applicability of these functions or services depends on their availability): (1) Account registration; (2) content uploading and sharing and/or (3) Comment.

The collected personal information may include phone number, email and BEJOINT account of child visitor and his/her guardian.

Important: Where a child visitor wants to register as a BEJOINT user, his/her guardian shall deal with relevant matters based on our requirements and submit the above personal information

about him/her and the child visitor. The information may be used to (1) verify the child's BEJOINT account; (2) verify identity of child and his/her guardian and relationship between both; (3) obtain guardian's permission for children's access to services. Your child may be unable to enjoy the services which entail BEJOINT registration if you refuse to provide the information. Meanwhile, for BEJOINT account which the guardian registers, we will store guardian's email and contacts, for the purpose of maintaining child's account in future (e.g. protecting account safety).

Other Kinds of Information We Collect?

When child visitor uses our products and services, we may collect:

Log information: When a child visitor uses our products or services, we may collect the use details of child visitor for our products or services, and save them as relevant network log, such as the search and query contents corresponding to the child visitor's login account, IP address, browser type, telecom operator, network environment, language, visit date and time, web browsing record of child visitor's visit, push and opening record, staying duration, refreshing record, release record, follow, subscription, favorite and share.

Device information: We may receive and record relevant information of child visitor's device (such as mobile phone, computer, etc.) (such as IMEI, MAC, Serial, IMSI identification code of SIM card, device model, operating system and version, client version, device resolution, package name, device settings, progress and software list, UDID, software and hardware characteristic information), and relevant information of device location (e.g. IP address, port information, GPS position and WLAN access point able to provide relevant information; sensor information (e.g. Bluetooth and base station)).

The Way We Store and Use Child Visitor's Information

We only retain child visitor's personal information in China after collection and during the period necessary for the purpose described herein and the time limit prescribed in laws and regulations.

With child visitor's information, we could provide products or services that he/she subscribes

(the applicability of these functions or services depends on their availability) and notify child visitor of information about new products, services, function or improvement; treat/arrange customer service needed by child visitor/technical inquiries or problems and/or notify child visitor of the latest update. We may use third-party data to enhance or integrate the information that you or your child provides for us.

Last, we may apply child visitor's information to marketing, chart analysis or user statistics, so that our products and services meet user's demand more. All our deeds are aimed to understand and serve our users better.

Subject that Collects Child Visitor's Information

With the maximum scope allowed by applicable laws, we will share the information provided on this APP with our affiliated companies, unless otherwise specified. Therefore, you shall hereby agree the receiving party of the above information to use child visitor's personal information, and the child visitor may receive the information from any of the receiving parties mentioned above. In addition, we provide part of services in cooperation with our partners. If you or child visitor refuse to share your information by other company, please avoid using relevant service or providing information.

Important: We can neither control the behaviors of third-party company sharing our data nor guarantee the third-party company's use of the privacy protection and safety strategies that we use.

Important: Some advertisers or websites have or include link with this website and may collect child visitor's personal information. ALWAYS bear in mind: This Policy does not apply to or control any third-party advertiser's or website's behaviors and activities.

Subject that Shares Child Visitor's Personal Information

We may share child visitor's information with a third party through the way set forth below, in order to provide our services for child visitor, perform our obligations and exercise our rights in *BEJOINT User Agreement* or this Policy and understand, maintain and improve our services.

We reserve the right to disclose child visitor's personal information according to laws, which means that we can disclose some personal information of minors to their parents or guardian upon their valid claim. Besides, where child visitor violates the use provisions or licensing agreement

included in this website or products, or may bring about damage or harm to our rights or properties, other users of this APP or products or anyone who may be harmed due to child visitor's behavior (either unintentionally or intentionally), we will reserve the right to disclose child visitor's personal information under a special circumstance, as long as we believe the disclosure of personal information is in favor of recognition, liaison or litigation.

We have designed share and comment areas on this website for user's opinion exchange and interpersonal communication. Important: The information released in share and comment areas will be open on the Internet, and information releaser shall bear all liabilities arising therefrom.

Child Visitor's Choices on Collection, Use and Release of Personal Information

We allow child visitor to control the personal information that we can get. When providing personal information, child visitor will be asked whether accepting the information about future new product, promotion or services.

If you or your child plans to stop sharing personal information with a third party that is not our affiliated company, and/or receiving information about relevant new products, services or promotion (via email or mail), please feel free to contact us at any time to give us the name of the undesirable information or service so that we could meet your request ASAP.

儿童专用隐私政策

最近更新日期：2020 年 1 月

使用本 APP 即表示您及您的孩子接受本儿童专用隐私政策。本儿童专用隐私政策可能出现修订，请定期查阅以确保知悉全部修订内容。如果本儿童专用隐私政策出现重大修订，我们将及时进行通知。继续使用本 APP 即表示您及您的孩子接受修订内容。

本 APP 由深圳前海海上的鸟科技有限公司（下称“BEJIONT”或“我们”）运营。我们尊重 14 周岁以下未成年人（“儿童”）的隐私权，并认可为儿童访问者提供安全环境的重要性。我们已经采取了儿童专用在线隐私保护政策（“儿童专用隐私政策”），该政策指导我们如何收集、存储和使用儿童访问者及其监护人提供给我们的儿童访问者信息。本儿童专用隐私政策包括我们如何保护在线儿童访问者隐私权的细节，并不必然适用于由我们线下收集的信息。为保护您的孩子的隐私权，我们自愿采纳该隐私保护措施，我们所有网站均符合既定的在线信息收集及使用准则。本政策未尽事宜，则以《BEJOINT 隐私政策》为准。

有关儿童隐私保护的声明或政策的问题、申诉、举报或意见，请联系我们。我们的联系方式为：sayhi@bejoint.com

我们会收集哪些私人信息？

我们会收集您或者您的孩子自愿提交的私人信息。当您或者您的孩子提交信息时，信息通常会通过下列某种形式进行提交（根据这些功能或服务是否提供而决定是否适用）：（1）账号注册，（2）内容上传分享，和/或（3）评论。

所收集的私人信息可能包括儿童访问者及其监护人的电话号码、电子邮件地址和 BEJOINT 账号。

请注意，当儿童访问者想要注册 BEJOINT 时，我们需要儿童访问者的监护人进行相关操作并提交有关监护人及儿童访问者的上述私人信息。这些信息将可能用于：（1）注册儿童 BEJOINT 账户；（2）验证儿童和监护人身份及关系；（3）要求得到监护人对儿童使用服务的许可。如果您拒绝提供这些信息，您的孩子将可能无法使用需要注册 BEJOINT 的服务。同时，对于监护人进行注册的 BEJOINT 账户，我们将存储监护人的电子邮箱和联系方式，以帮助维护儿童账户，例如保护账户安全。

我们会收集其它种类的哪些信息？

在儿童访问者使用我们的产品和服务时，我们可能会收集下列信息：

日志信息：当儿童访问者使用我们的产品或服务时，我们可能会自动收集儿童访问者对我们产品或服务的详细使用情况，作为相关网络日志保存。例如儿童访问者的登录账号所对应的搜索查询内容、IP 地址、浏览器的类型、电信运营商、网络环境、使用的语言、访问日期、时间及儿童访问者访问的网页浏览记录、推送打开记录、停留时长、刷新记录、发布记录、关注、订阅、收藏及分享。

设备信息：我们可能会根据儿童访问者在软件安装及使用中授予的具体权限，接收并记录儿童访问者所使用的设备（手机、电脑等）相关信息（例如 IMEI、MAC、Serial、SIM 卡 IMSI 识别码、设备机型、操作系统及版本、客户端版本、设备分辨率、包名、设备设置、进程及软件列表、唯一设备标识符、软硬件特征信息）、设备所在位置相关信息（例如 IP 地址、端口信息、GPS 位置以及能够提供相关信息的 WLAN 接入点、蓝牙和基站传感器信息）。

我们如何存储及使用儿童访问者的信息？

我们将仅在本儿童专用隐私政策所述目的所必需的期间和法律法规要求的时限内保留儿童访问者的私人信息，且儿童访问者的信息在收集后将存储于中华人民共和国境内。

儿童访问者的信息将使我们能够（根据这些功能或服务是否提供而决定是否适用）提供儿童访问者所订购的产品或服务，通知儿童访问者有关新产品、服务、功能或改进的信息，处理/安排儿童访问者所需的客户服务/技术询问或问题，和/或通知儿童访问者最新的更新信息。我们可能会使用第三方数据加强或整合您或您的孩子向我们提供的信息。

最后，我们可能会将儿童访问者的信息应用在市场营销、图表分析或用户统计中，以使产品和服务更加符合用户的需求。这种做法目的是更好地理解和服务我们的用户。

谁在收集儿童访问者的信息？

在适用法律允许的最大范围内，除非另行说明，在本 APP 上所提供的信息将由我们和我们的关联公司共享。因此，您特此同意上述信息接收方有权使用儿童访问者的私人信息，并且儿童访问者可能会收到来自上述提及的任何一个接收方的信息。此外，部分服务由合作伙伴共同提供。如果您或儿童访问者不希望信息被其他公司共享，您或儿童访问者可以选择不使用相关服务或不提供任何信息以防止信息的发送。

请注意，我们无法控制共享我们数据的第三方公司的行为，我们同样无法保证第三方公

司能够采取与我们相同的隐私保护及安全策略。

请注意，某些广告商或网站拥有或包含指向本网站的链接，并有可能收集儿童访问者的私人信息。请牢记，本儿童专用隐私政策不适用、不控制第三方广告商或网站的行为活动。

儿童访问者的私人信息会被同谁共享？

为了向儿童访问者提供我们的服务，履行我们在《BEJOINT 用户服务协议》或本儿童专用隐私政策中的义务和行使我们的权利，理解、维护和改善我们的服务。我们可能需要将儿童访问者的私人信息以以下方式与第三方共享。

我们保留因法律需要透露儿童访问者私人信息的权利，即在未成年人的家长或监护人有效要求的情况下，我们可将未成年人的某些个人信息透露给其家长或监护人。另外，如果儿童访问者违反本网站或产品所含的使用条款或许可协议、或可能对我们的权利或财产、本APP 或产品的其他用户或任何可能因儿童访问者的行为而受到伤害的人带来（有意或无意的）损害或妨害，并当我们认为透露私人信息对识别、联络或诉讼工作有帮助时，我们保留在特殊情况下透露儿童访问者私人信息的权利。

本网站设置有分享、评论区域可供用户交换意见和互相沟通。在分享、评论区域发布信息时请注意，所发布的信息将在互联网公开，信息发布者将对此负责。

有关收集、使用和发布私人信息儿童访问者有哪些选择？

我们允许儿童访问者控制我们可获得的私人信息。在儿童访问者提供私人信息的同时，我们将让儿童访问者选择是否接收未来新产品、宣传或服务的信息。

任何时候如果您或您的孩子希望停止同并非我们的关联公司的第三方共享私人信息，和/或停止（通过电子邮件或邮寄方式）接收有关新产品、服务或宣传的信息，您可以联系我们。请写明不希望继续接收的讯息或服务的名称，以便我们更好地为您解决。