



# 新奥能源控股有限公司 ENN Energy Holdings Limited

*(Incorporated in the Cayman Islands with limited liability)*

**(Stock Code: 2688)**

## **Data Privacy Policy**

### **Prompt Clause**

We recognize the importance of your trust and personal privacy to you. We adopt security measures in compliance with relevant laws and regulations to safeguard your personal information. ENN Energy Holdings Limited (hereinafter "we" or "ENN Energy") therefore formulated ENN Energy Privacy Policy (hereinafter "this Policy"). It is important to note that our Board of Directors is responsible for reviewing network strategy and security and the highest management of network strategy and security is Chief Information Officer of ENN Energy.

This policy only applies to the business introduction, corporate branding and customer message collection service provided by ENN Energy. It does not apply to other services provided by third-party nor products or services of ENN Energy which have already established their respective privacy policies.

This Policy is meant to specify how we collect, use, store and share your personal information during the use of our services (or products), and how we provide you with access, updates, control and protection of the information. This Policy is highly related to the services (or products) of ENN Energy that you are using. Please read this Policy carefully before using our services (or products). Should you have any questions, comments or suggestions about this Policy, please contact us through customer services representative(s) of ENN Energy.

### **Part 1: Definitions**

**Affiliates:** The affiliated companies disclosed in the annual report of ENN Energy.

**Personal Information :** All kinds of information, recorded by electronic or other means, that can be used, alone or combined with other information, to identify a specific natural person or reflect activities of a specific natural person.

**Personal Sensitive Information:** Including identity card numbers, biometric information, bank account numbers, property information, location data, transaction information, personal information of children 14 years of age or under.

**Personal Information Deletion:** The process of removing personal information from systems used to realize daily business operations, to make the information irretrievable and inaccessible.

## **Part 2: Privacy Policy**

This Policy is helping you understand the content below:

- (1) How we collect and use your personal information
- (2) How we use Cookies and similar technologies
- (3) How we share, transfer, and publicly disclose your personal information
- (4) How we protect your personal information
- (5) How we manage your personal information
- (6) How we process personal information of minors
- (7) International transfer of your personal information
- (8) Updates to this Policy
- (9) How to contact us

### **(1) How We Collect and Use Your Personal Information**

We collect and use your personal information for the following purposes described in this Policy:

#### **A. To demonstrate our products and services**

For the purposes of improving our products or services and providing you with customized information services, we will retrieve your browsing or search preferences, behaviours and habits, location information and other information based on your browsing and search history, device information, location information. Information will be displayed as an indirect user profile based on information characteristics.

#### **B. To provide our products or services**

We may use your personal information collected in the course of provision of our services for the following purposes:

- i. To process applications or request in relation to our products, facilities and

services;

- ii. To conduct customer, product, facility and service investigation;
- iii. To handle customer complaints and inquiries about ENN Energy's subsidiaries;
- iv. Any matters directly related to the above.

C. To safeguard your security

To ensure the safety and security of your use of services provided by us, our affiliates and partners, protect the personal and property safety of you, other users or the public, and also better prevent phishing websites, fraud, network vulnerabilities, computer viruses, and network attacks, network intrusion and other security risks to accurately identify violations of laws and regulations or gas supply agreements, we may use or integrate your user information, device information, relevant user logs and information from our affiliates and partners obtained under your consent or shared information permitted by law, to verify your identity, detect and prevent security incidents, and also take necessary recording, audit, analysis, and disposal measures according to the law.

D. Other purposes

When we use the information for other purposes not prescribed in this Policy or collect information for a specific purpose for other use, we will obtain your authorization in advance.

E. Exceptions to Authorized Consent

We are not required to obtain your authorized consent for collection and use of personal information in the following specific circumstances according to relevant laws and regulations:

- i. Directly related national security and national defence;
- ii. Directly related to public safety, public health and significant public interests;
- iii. Directly related to criminal investigation, prosecution, trial and judgment enforcement;
- iv. When safeguarding the major lawful rights and interests such as life and property of personal information subjects or other persons, and it is difficult to obtain the consent of the personal information subject;
- v. When the personal information subject voluntarily discloses the collected personal information to the general public
- vi. When the personal information is collected from legitimate public information channels;
- vii. When necessary to sign and perform a contract according to the personal

- information subject's request;
- viii. When necessary to maintain the safe and stable operation of the provided products or services, such as to detect and handle product or service malfunctions;
  - ix. When necessary to make legal news reports;
  - x. When necessary for an academic research institute to conduct statistical or academic research in the public interest, which also has de-identified the personal information when providing academic research or results externally;
  - xi. When other situations specified by laws and regulations.

If we cease our operations, we will immediately stop all personal information collection activities, notify you of the cessation of operations individually or through public announcement, and delete or anonymize the personal information in our possession.

## **(2) How we use Cookies and Similar Technologies**

### **A. Cookie**

We may provide you with services (or products) through our websites. To ensure normal and efficient operation of the website, provide you with easy access, and recommend content more relevant to your interests, we may record relevant information on your computer or mobile device through cookies, Flash cookies or other local storage managed by your browser or associated application (collectively referred to as "Cookies"). Cookies allow us to record certain information such as your preferences or products information in your shopping cart. Please understand that some of our services can only be delivered with the use of cookies. You can choose to modify the acceptance of cookies or refuse cookies at your preference given that your browser or browser add-ons provides the option. However, refusing our cookies may in some cases affect your safe access to the website and use of our services.

### **B. Web beacons and Pixel tags**

In addition to cookies, we may also use web beacons, pixel tags and similar technologies. For example, the email we send you may contain a click-through URL that links to our website. If you click on the link, we will track your visit to help us learn about your preferences towards our product or service to improve our customer service. Web beacons are usually a transparent graphic image embedded in a website or email. We use pixel tags to identify whether the email has been opened. If you do not wish your activity to be tracked in this manner, you can unsubscribe from our mailing list at any time.

### **(3) How We Share, Transfer, and Publicly Disclose Your Personal Information**

#### **A. Sharing of Personal Information**

We will not share your personal information with other companies, organizations and individuals with the following exceptions:

- i. Sharing with explicit consent: We will share your personal information with other parties after obtaining your explicit consent.
- ii. Sharing under statutory law: We may share your personal information externally in accordance with laws and regulations, the need for dispute resolution, or as required by the administrative and judicial authorities under the law.
- iii. Sharing with affiliates: To allow the subsidiaries of ENN Energy to provide services to you, recommend information that more relevant to your interests or protect the personal and property safety of our affiliates, other users or the public, your information will be shared with our affiliates. We will only share it on a need-to-know basis (for example, we share your gas account to facilitate your use of our affiliates' products or services). If we share your personal sensitive information or our affiliates change the intended purposes for which they use your information, they will seek your authorization again.
- iv. Sharing with authorized partners: Some of our services are provided jointly by us and authorized partners for the purposes prescribed in this Policy. We may share some of your personal information with our partners to provide better customer service and member experience. We will only share your personal information for legal, legitimate, necessary, specific and clear purposes, and only share the personal information necessary to the provision of services. Our partners are not entitled to exercising any rights to use the shared personal information for other purposes not related to products or services.

Currently, our authorized partners include suppliers, service providers and other partners. We share information with suppliers, service providers and other partners supporting our business. They provide support including infrastructure technical services, services analysis, measuring the effectiveness of advertising and services, providing customer services, payment services and academic research and surveys.

For companies, organizations and individuals with whom we share personal information, we will sign stringent data protection agreements (DPA) with them to ensure their compliance with our instructions, this Policy and any other relevant confidentiality and security measures when processing the personal

information.

B. Transfer of Personal Information

We will not transfer your personal information with other companies, organizations and individuals with the following exceptions:

- i. Transfer with explicit consent: We will transfer your personal information to other parties after obtaining your explicit consent.
- ii. When merger, acquisition, bankruptcy liquidation, or other situations involving merger, acquisition or bankruptcy liquidation, if it involves any transfer of personal information, we require the companies and organizations that hold your personal information to be bound by this Policy or require the company, organization and individual to obtain consent again from you.

C. Public Disclosure of Personal Information

We will publicly disclose your personal information only under the following conditions:

- i. We may publicly disclose your personal information prior to your explicit consent or at your request.
- ii. If you have violated the laws and regulations or this Policy, or to protect the safety of our and our affiliates' users or the public, we may publicly disclose your personal information, including relevant violations and measures that ENN Energy has taken against you after obtaining your consent in accordance with laws and regulations or this Policy.

D. Exemptions from Obtaining Authorized Consent Prior to Sharing, Transfer, and Public Disclosure of Personal Information

We may share, transfer and publicly disclose your personal information without your prior consent in the following circumstances:

- i. Directly related to national security and national defence;
- ii. Directly related to public safety, public health, and significant public interests;
- iii. Directly related to criminal investigation, prosecution, trial, and judgment enforcement, etc.;
- iv. When safeguarding the major lawful rights and interests such as life and property of you and other individuals, and it is difficult to obtain consent from you;
- v. When you voluntarily opened the collected personal information to the general public;
- vi. When personal information is collected from legitimate public information

channels, such as legitimate news reports and open government information.

As stipulated by law, the sharing or transfer of de-identified personal information which ensure the data recipient cannot recover and re-identify the personal information subject, are not classified as external sharing, transfer and public disclosure of personal information. These information storage and processing actions do not require additional notice and consent.

#### **(4) How We Protect Your Personal Information**

We have taken reasonable and practical safety measures and comply with industry standards to protect your personal information and prevent it from unauthorized access, public disclosure, use, modification, damage, or loss. We also use encryption technology to improve information confidentiality, trusted protection mechanisms to prevent malicious attack, and access control mechanisms to permit only authorized access to your personal information. We also provide our employees with security and privacy protection training to strengthen their awareness of personal information protection.

We will take reasonable and practical measures to avoid unnecessary personal information collection. We only retain your personal information for the period necessary for the purposes prescribed in this Policy, unless otherwise the retention period is extended or permitted by law.

Considering the Internet is not an absolutely safe environment, we strongly recommend you do not disclose your personal information other than through email address or message box displayed on this website. You can also share or exchange your personal information during our service. When you initiate an information exchange or share, you can delegate any parties of your choice as a third party that granted access to your contact information, exchanged information or shared information.

Please note that the information you voluntarily share or publicly share when using our services may involve personal information or personal sensitive information of you or others. Please consider carefully whether to share or publicly share relevant information.

We strive to ensure the security of your information. If our physical, technical or protection infrastructure are damaged, resulting in unauthorized access to

information, public disclosure, tampering or destruction that damage your legitimate rights and interests, we will take the corresponding legal responsibility.

In case of a security incident, we will inform you in accordance with applicable laws and regulations of the basic information and possible impact of the security incident, measures we have taken or will take, suggestions on the precautions for you to reduce relevant risks, remedy for you etc. We will inform you by email, letter, telephone, etc. about the incident. When it is difficult to notify the personal information subjects individually, we will issue an announcement in a reasonable and effective manner.

At the same time, we will also report the handling of personal information security incidents following the requirements of regulatory authorities.

## **(5) How to Manage Your Personal Information**

You are allowed to access and manage your personal information in the following ways:

### **A. Access to Your Personal Information**

You have the rights to access your personal information with exceptions under applicable laws and regulations. You can access your personal information through this website and the back-end system of ENN Energy's corporate website. If you cannot access your personal information through the above channels, please contact us through the phone number on this website.

### **B. Personal Information Rectification**

When you identify any errors in our processing of your personal information, you have the right to make a modification or supplemental information. You can submit your application by the means listed in "(a) Access to Your Personal Information".

### **C. Personal Information Deletion**

You can request a partial deletion of your personal information by the means listed in "(a) Access to Your Personal Information".

You can submit a request for personal information deletion to us under the following conditions:

- i. If we violate laws and regulations in the handling of personal information



- ii. If we collect and use your personal information without your explicit consent;
- iii. If we seriously violate the agreement with you in the handling of personal information;
- iv. If you no longer use our products or services;
- v. If we do not provide you with any products or services permanently.

If we approve your request of deletion, we will also notify the entity who obtained your personal information from us and request a deletion in a timely manner, unless otherwise stipulated by laws and regulations, or the entity obtained your authorization.

When your information is deleted from our service, the corresponding information in our backup system will not be immediately deleted until the backup system is updated.

#### D. Change Your Authorization Scope

Basic personal information is required to ensure the smooth completion of each business function (please see "Part II, Section (1)" of this Policy). You can contact ENN Energy at the phone number on this website to give or withdraw your consent for the collection and use of additional personal information.

Once you withdraw your consent, we will no longer process the corresponding personal information. Nevertheless, the processing of personal information carried out before your consent withdrawal will not be affected.

#### E. Limiting Automatic Decision-making of Information System

We may rely on decision-making mechanisms based on algorithms and information systems in certain business functions. If any of those decisions significantly affect your legal rights and interests, you have the right to request an explanation. We also provide a grievance mechanism without infringing on ENN Energy's trade secrets, other users' rights or social and public interests.

#### F. Response to Your Above Request

You may need to provide a written request or otherwise prove your identity in other ways. Identify verification is required before you can make a request from processing.

We will reply to your reasonable request within 15 days. If you disagree with the

response, you can file a complaint through the email address or phone number displayed on this website.

We may reject requests that are unreasonably repetitive, require excessive technical steps (e.g. new systems or fundamental change to existing practices), impose risks to legitimate rights and interests of others or impractical request.

We are not able to approve your request as required by laws and regulations under the following conditions:

- i. Directly related national security and national defence;
- ii. Directly related to public safety, public health, and significant public interests;
- iii. Directly related to criminal investigation, prosecution, trial, and judgment enforcement, etc.;
- iv. Sufficient evidence to show that the personal information subject has subjective malice or abuse of rights;
- v. Responding to your request will result in serious harm of lawful rights and interests of you or other individuals or organizations;
- vi. Involving trade secrets.

#### **(6) How We Process Personal Information of Minors**

Minors are not allowed to create member account without the consent of their parents or legal guardians. We encourage minors to ask their parents or legal guardians to read this Policy carefully and obtain the consent of parents or legal guardians before using our services or providing us with their personal information.

For personal information collection of minors with the consent of parents or legal guardians, we only use, share and transfer the personal information of minors permitted by laws and regulations, with explicitly consented by parents or legal guardians or under necessary conditions for the purpose of protecting the minors.

#### **(7) International Transfer of Your Personal Information**

Personal information collected and produced during our operations in mainland territory of the People's Republic of China is stored in China except for the following conditions:

- i. Explicitly stipulated by laws and regulations;
- ii. Obtain your explicit authorization.

We ensure adequate protection of your personal information in accordance with this Policy in the above cases.

#### **(8) Updates to this Policy**

We may update this Policy at times. We will not restrict your rights set out by this privacy policy without your explicit consent. Any changes to the privacy policy will be posted on our dedicated page.

If significant changes are made to this policy, we also provide notice in a more noticeable manner (including ENN Energy's public feedback collection, notices or pop-ups on the website).

Significant changes to this policy include but are not limited to:

- i. Significant changes in our service model (e.g. the purpose of processing personal information, the types of personal information processed, the manner to use personal information, etc.);
- ii. Significant changes in ownership structure such as changes in owner as a result of mergers and acquisitions, etc.;
- iii. Changes in the main objects of personal information sharing, transfer or public disclosure;
- iv. Significant changes in your rights to participate in the processing of personal information and the way to exercise it;
- v. Changes in the departments in charge of personal information security, contact methods and complaint channels;
- vi. High risk indicated in the personal information security impact assessment report.

#### **(9) How to Contact Us**

You can contact us in any of the following ways and we will respond to your request within 15 days:

- i. If you have any questions, opinions or suggestions about this Policy, you can contact us through the email address, message window and phone number on this website;
- ii. If you detect any leakage of personal information, you can report it through the email address, message window and phone number on this website.

### **Part 3: Appendix**

This policy is effective on trial from May, 2020. The matters not covered in this policy shall be explained by ENN Energy Holdings Limited.