

HEIHONGTANG Privacy Statement

First enacted: March 2024

Overview

This privacy policy ("Policy") describes how Shanxi Huaying Shangshi Catering Co., Ltd and its parent and other affiliated companies ("HEIHONGTANG") collect, use and disclose personal information of customers through our websites and online services, including <https://www.heihongtang.com/> ("HEIHONGTANG Website"), the HEIHONGTANG Mobile Application ("Mobile App"), other HEIHONGTANG owned or operated websites, applications, and online services that we may operate, as well as through our programs and in our physical stores ("Services"). This Policy does not apply to websites and services that display or link to different privacy statements. Websites and services co-branded with other partners may display or link to a joint privacy statement or separate privacy statements of our partners in addition to our Policy. By accessing the Sites or utilising the Services, you hereby consent to the use of your information, including your personal information, in the manner described in this Policy. Without limiting the generality of the foregoing, you authorise HEIHONGTANG to transmit your information outside of USA and UK in the manner and for the purposes described in this Policy.

By continuing to use HEIHONGTANG Services you acknowledge this Privacy Notice, and agree to our Terms of Use and other important policies, all available on our Online Policies page.

1. Updates to this Privacy Notice

We may update this Notice from time to time. We will notify you of material changes to this Notice and will update the Last Revised date on this Notice. We encourage you to look for updates and changes to this Notice when you access our websites and mobile applications.

2. Information We Collect

When you visit and use the HEIHONGTANG Services, we collect the following categories of information:

- **Identifiers** – We collect information that can be used to identify you, such as your first and last name, phone number, username and password, email address, IP address, day and month of your birthday, and demographic information (such as gender).

- **Financial Information** - We may also collect information such as your credit card and debit card information, telephone number, and name.
- **Commercial Information** – We may collect information about your transactions in our stores, on our websites or via our HEIHONGYANG App including what products you purchase, how frequently you purchase them, any promotions associated with a purchase, and the products you have placed on your “Shopping Bag” in the Mobile App for future purchase.
- **Electronic Network Activity Information** - We collect information related to your electronic network activity, such as your browsing history, information about how you use the HEIHONGTANG Services, information about your device, and information related to your communications with HEIHONGTANG via email.
- **Geolocation Information** - We may collect information about your location of your device, such as information derived from your device (e.g., based on a browser or device’s IP address). We may also use location-based technology in our retail locations, to collect information about the presence of your device, if your Bluetooth is turned on and your device settings allow for this.
- **Audio and Visual Information** – We may collect audio and visual information when you use the HEIHONGTANG Services. For example, closed circuit video surveillance cameras (“CCTV”) may be installed at some of our retail locations to monitor building security and assist in crime prevention, detection, and investigation, and to ensure the safety of our staff and visitors to our facilities, and these CCTV cameras may collect audio, visual, and similar information.
- **Image** - We may collect images when you use the HEIHONGTANG Services. For example, we may collect the pictures that you use to update and change your profile, and the pictures that you upload when communicating with online customer service and other users.
- **Inferences** - We may also collect inferences drawn from the other information described above.

Additionally, depending on how you use the HEIHONGTANG Services, we may collect the following categories of sensitive personal information from you:

- **Precise Geolocation Information** - We may collect information about the precise location of your device (e.g., GPS latitude and longitude), consistent with your device settings. We may also use location-based technology in our retail locations, to collect information about the presence of your device, if your Bluetooth is turned on and your device settings allow for this. We may collect this location information or derive it from your GPS, WiFi, Bluetooth or other location-based technology for purposes of facilitating our services, such as to provide you with information about stores near you, to enable you to remotely order and pay for our products and services, or so that you may have certain HEIHONGTANG products delivered to you by a third-party vendor.

We may aggregate or de-identify the information described above. Aggregated or de-identified data that we do not attempt to reidentify is not subject to this Privacy Notice.

Without this information, we may not be able to provide you with all the requested services.

3. Sources of Information

In addition to the information we receive from you, we also receive the categories of information described above from other sources including from other users of HHEIHONGTANG Services (such as when they purchase a gift for you), advertising partners, co-sponsors, internet service providers, data analytics providers, operating systems and platforms, social networks, and publicly available sources. For example, if you access any social media or similar services through the HEIHONGTANG Services to login or to share information about your experience on our HEIHONGTANG Services with others, we may collect information from these third-party services.

4. How We Use Your Information

We use your information for business purposes, including to provide the products and services you request, to perform customer service functions, for security and fraud prevention, for marketing and promotional purposes, and to perform website and mobile application analytics. We may use the information we collect about you to:

(a) To Provide Our Services - We may process your information when you access or use the HEIHONGTANG Services, including to:

- process or fulfill orders and transactions;
- maintain and service accounts;
- debug to identify and repair errors that impair existing functionality;
- facilitate the functionality of our websites and mobile applications;
- process payments; and
- customise experiences and personalization when you are in and around our stores, if you have given permission for location sharing.

(b) To Communicate With You - We process certain information in order to communicate with you in relation to your accounts, our services, our marketing, and your requests, including to:

- provide customer service, including when you interact with our customer service agents via email, and requests for information;
- communicate with you about orders, purchases, returns, services, accounts, programs, contests, and sweepstakes;
- send you personalized promotions, content, and special offers;
- communicate with you about our brands, products, events, or other promotional purposes;
- implement your communications preferences, such as sharing information with HEIHONGTANG business partners so that they may email you about their promotions, products and initiatives; and
- provide important product safety information and notice of product recalls.

(c) For Research, Development, and Improvement of Our Services - We want to ensure that our website, mobile applications, and services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we may process certain personal information, including to:

- maintain, improve, and analyze our websites, mobile applications, ads, and the products and services we offer; and
- help to ensure security and integrity of the HEIHONGTANG Services, including to detect, prevent, or investigate suspicious activity or fraud.

(d) To Enforce our Terms, Agreements, or Policies - To maintain a safe, secure, and trusted environment for you when you use our websites, mobile applications, and other services, we use your personal information to ensure our terms, policies, and agreements with you and any third parties are enforced.

(e) To Comply with Applicable Laws - We may be required to process certain information under certain laws and regulations, such as tax laws, as well as to:

- maintain appropriate records for internal administrative purposes; and
- comply with applicable legal and regulatory obligations, and respond to lawful governmental requests, as needed.

(f) Targeted Advertising - We may process your information to provide you with targeted advertising (also known as cross-contextual advertising and

online behavioral advertising) and offers and promotions that you may be interested in.

(g With Your Consent - We may process certain information in order to fulfill any other business or commercial purposes at your direction or with your consent.

5. How We Disclose Your Information

We disclose your information as needed to fulfill the purposes described in this Notice and as permitted by applicable law.

(a) When We Work Together - We may share information between and among HEIHONGTANG, its subsidiaries, and affiliated companies for purposes of management and analysis, decision making, and other business purposes. For example, we may share your information with our subsidiaries and affiliated companies to process orders and requests and expand and promote our product and service offerings.

(b) When We Work with Service Providers & Business Partners - We may share identifiers, commercial information, electronic and network activity, geolocation and precise geolocation information, audio and visual information, and inferences, as described above, for a variety of business purposes, such as payment processing, website and data hosting, location mapping, product and service delivery, customer service, advertising and marketing (including counting ad impressions, ensuring compliance with industry standards, personalization, analytics services, security and performance monitoring, maintaining and servicing accounts, processing or fulfilling orders and transactions, verifying customer information, research, auditing, and data processing.) We strive to contractually prohibit these service providers and business partners from retaining, using, or disclosing your confidential personal information for any purpose other than performing agreed upon services for us.

(c) When We Work on Business Transactions - If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.

(d) When Sharing Helps Us Protect Safety and Lawful Interests - We may disclose your information if we believe that the disclosure is required by law, if we believe that the disclosure is necessary to enforce our agreements or

policies, or if we believe that the disclosure will help us protect the rights, property, safety of HEIHONGTANG or our customers or partners.

(e) When You Give Consent – We may share information about you with other companies if you give us permission or direct us to share the information.

(f) When You Post on Our Websites – If you post information on a blog or another part of our websites, the information that you post may be seen by other visitors to our websites. We are not responsible for the information you choose to submit in these public areas.

6. Cookies, Web Beacons and Similar Technologies

We and others may use a variety of technologies to collect information about your device and use of our websites and mobile applications. These technologies include first- and third-party cookies, web beacons, JavaScript, entity tags, and HTML local storage. Most web browsers can be programmed to accept or reject the use of some or all of these technologies, although you must take additional steps to disable or control other technologies. For more information on exercising your preferences in relation to cookies and similar technologies, please see the section of this Notice titled “Your Choices & Rights”.

- **Cookies** – Cookies are small data files that are sent from a website’s server and are stored on your device’s hard drive either for only the duration of your visit (“session cookies”) or for a fixed period (“persistent cookies”). Cookies contain information that can later be read by a web server.

You may be able to reject cookies, web beacons, entity tags and HTML5 local storage by adjusting the appropriate settings in your browser. Each browser is different, but many browsers have preferences or options that may be adjusted to allow you to either accept or reject cookies and certain other technologies before they are set or installed, or allow you to remove or reject the use or installation of certain technologies altogether. If you want to learn the correct way to modify your browser settings, please use the Help menu in your browser or review the instructions provided by the following browsers: Internet Explorer, Google Chrome, Mozilla Firefox, Safari Desktop, Safari Mobile; and Android browser.

- **Web Beacons** – Web beacons are small, transparent images that are embedded in web pages, applications, and emails that are sometimes called “clear gifs,” “single pixel gifs,” “page tags” or “web bugs.” We use web beacons to track the web pages you visit, to test the effectiveness of our marketing, and to find out if an email has been opened and acted on.

- **JavaScript** – JavaScript are code snippets embedded in various parts of websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components.
- **Entity Tags** -- Entity Tags are HTTP code mechanisms that allow portions of websites to be stored or “cached” within your browser and validates these caches when the website is opened, accelerating website performance since the web server does not need to send a full response if the content has not changed.
- **HTML5 Local Storage** – HTML5 local storage allows data from websites to be stored or “cached” within your browser to store and retrieve data in HTML5 pages when the website is revisited. These and similar technologies are used for the following purposes:
- **Services and Functionality** – Some of these technologies are required to allow you to access and use our websites or mobile applications and the various services and functionality we offer. Without these technologies, some of the services and functionality on our websites and mobile applications would not work properly.
- **Performance Monitoring** – Some of these technologies help us analyze and estimate traffic and assess the volume of use of services and functionality on websites and mobile applications. They show us how visitors and customers interact with our digital properties, whether there are any errors, the degree to which certain web pages, applications, services or functionality are accessed and used and how they are performing or operating. When these technologies are used for performance monitoring, no directly identifiable information (e.g., your name, email address or phone number) is collected.
- **User Convenience** – Some of these technologies enhance the ease of use of our websites and mobile applications and the services and functionality they make available by accelerating load and refresh times and remembering information that you have provided on prior visits to our websites or when you last used a website or mobile application service or functionality.
- **Marketing** – Some of these technologies are used to tailor your experience on our website, within our mobile applications, or across your applications or devices by controlling the promotions, advertisements and other marketing messages that may appear when you access or use these or other digital properties.

Taken together, these technologies help us learn which services and functionality you are using and how you are accessing information about us.

We may use this information to personalize your visit to a website or use of a mobile application or to send you relevant promotions and advertisements.

7. How We Protect Your Information

HEIHONGTANG uses reasonable technical, physical, and administrative security measures to reduce the risk of loss, misuse, unauthorised access, disclosure or modification of your information. However, no security system is perfect, and due to the inherent nature of the Internet, we cannot guarantee that data, including personal information, is absolutely safe from intrusion or other unauthorised access by others. You are responsible for protecting your password(s) and maintaining the security of your devices.

8. Retention

HEIHONGTANG stores information as reasonably necessary and proportionate to accomplish the purposes identified in this Notice based on criteria such as the length of time we need to provide the services to you, and to meet legal requirements, including record retention, resolving disputes, and enforcing our agreements. Our retention of your information is governed by applicable law.

The personal information that you provide us is stored and processed on servers owned by HEIHONGTANG and other companies in the United States, Canada or elsewhere around the world, including locations outside of the country or jurisdiction where you are located. Regardless of the company or person who processes your information and where it is processed, we will take steps to transfer and protect your information through appropriate safeguards in accordance with applicable data protection laws and this Notice. In order to better provide our services, we will retain your personal information as long as you maintain your account. In the event of a cessation of operations, we will delete or anonymise your personal information following the termination of our services.

9. Children's Privacy

We do not intend for our websites or online services to be used by anyone under the age of 13. We do not knowingly collect, sell, or share information of consumers between the ages of 13 – 16. If you are a parent or guardian and believe we may have collected information about your child, please contact us immediately as described in the "Contact Us" section of this Notice. For more information, please see our Terms of Use.

10. HEIHONGTANG Wi-Fi

Many HEIHONGTANG stores support providing you access to wireless internet (WiFi) at no charge. For any such WiFi access, please carefully review the terms of use listed on the activation page prior to accepting and connecting.

11. Your Choices & Rights

(a) Your Choices

- **Location Services** – In order to use certain HEIHONGTANG Services, such as mobile order and pay (“MOP”) and location-based services and technology, you must either (a) enable “location services” in the HEIHONGTANG App; and/or (b) set the permissions in your mobile device to allow communication of this information.

If you allow for location sharing, your device may communicate with us in ways that allow for us to customize your experience in and around HEIHONGTANG stores, to monitor the effectiveness of our marketing efforts, to tailor messages based on your time and location patterns, and to limit the number of times you see a promotional message or offer. Precise geolocation may be used to fulfill services and application functionality you choose to engage with. You can manage the use of that personal information at anytime in your device settings.

For most mobile devices, you can disable the collection of geolocation information by turning off location services on your device. If you have any questions about how to prevent HEIHONGTANG from collecting your geolocation, we recommend you contact your mobile device service provider or the device manufacturer. Certain HEIHONGTANG App features and some HEIHONGTANG Services may not work properly without information about your location. You can re-enable the collection of geolocation information, at anytime, by turning on location services on your device.

- **Email Communications, Push Notifications, and In-App Messages** – The HEIHONGTANG App allows all users to set preferences for receiving promotional email communications from HEIHONGTANG, receiving push notifications on your device, and receiving inbox messages. Please note as well that you may opt-out of receiving email communications at any time by adjusting your HEIHONGTANG online account settings or by clicking the “unsubscribe” link included within any commercial email we send you.

If you use the Mobile App features described above, you consent to the transmission of your user information to HEIHONGTANG and/or its agents, and authorize HEIHONGTANG and/or its agents, to record, process, and store such user information as necessary for administering the Mobile App features and for purposes described in this Notice.

(b) Your Rights

Depending on where you live, you may be entitled to certain rights with respect to your personal information, as described below.

- **Right to Know** – You may have the right to know what personal information the business has collected about you, including the categories of personal information, the categories of sources from which it is collected, the business or commercial purposes for collecting, selling, or sharing it, and the categories of third parties to whom we disclose it.
- **Access and Data Portability** – Subject to certain exceptions, you may have the right to request a copy of the personal information that we collected about you during the 12 months before your request.
- **Deletion** – You have the right to request that we delete information that we collected from you and retained, subject to certain exceptions.
- **Correct Inaccurate Information** – You may have the right to request that we correct inaccuracies in the personal information we maintain about you.
- **Targeted Advertising** – We do not sell your information for monetary or valuable consideration. You may have the right to opt-out of having your personal information shared for purposes of targeted advertising. To opt-out, click the “Do Not Share My Personal Information” link.
- **Sensitive Information** – Companies who collect, use, and disclose your sensitive personal information for purposes other than to provide you with goods or services are required to provide you with the right to limit the use and disclosure of your sensitive personal information by providing a “Limit the Use and Disclosure of My Sensitive Personal Information” link. HEIHONGTANG only collects , uses, and discloses your sensitive personal information to provide services to you, therefore HEIHONGTANG is not required to provide this link.
- **Opt-Out Preference Signals** – Some web browsers allow consumers to automatically exercise their right to opt-out of sale/sharing with all businesses they interact with online by initiating an opt-out preference signal. We will honor such opt-out preference signals.

Requests should be submitted by info@honorteauk.com. Once we receive your request, we may verify it by requesting information sufficient to confirm your identity. You may be entitled to submit a request through an authorized agent or to appeal a refusal to take action on your request. To designate an authorized agent to exercise your rights, we will require written proof that the authorized agent has been authorized to act on your behalf or a copy of the power-of-attorney document granting that right.

(c Other California Rights

- If you are a California resident, you can request a notice disclosing the categories of personal information we have shared with third parties for the third parties' direct marketing purposes. To request a notice, please submit your request to info@honorteauk.com.
- Some web browsers have a "Do Not Track" preference that transmits a "Do Not Track" header to the websites you visit with information indicating that you do not want your activity to be tracked. We currently do not respond to browser "Do Not Track" signals, as there is no standard for how online services should respond to such signals. As standards develop, we may develop policies for responding to do-not-track signals that we will describe in this Notice.

12. Contact Us

We welcome your questions, comments and concerns about privacy. You can contact HEIHONGTANG Customer Service by info@honorteauk.com.