

PRIVACY STATEMENT and PERSONAL INFORMATION COLLECTION STATEMENT (Collectively, the “Privacy Policy”)

This Privacy Policy explains how we collect, use, process, disclose, share, transfer, and protect personal data. The terms and definitions used in this Privacy Policy shall have the same meanings as in the Terms of Service Agreement of Lurk Tech International Limited except as otherwise provided herein. When we ask for certain personal data from users, it is because we are required by applicable laws or regulations to collect such data, or it is relevant for our specified purposes. The provision of your personal data is voluntary, if such personal data is not obtained, we may not be able to provide you the Services. We fully understand and respect the importance of your personal data, and we shall adopt corresponding safety protection measures to protect your personal data in accordance with the applicable laws and regulations. We are committed to protecting the privacy, confidentiality and security of the personal information we hold by complying with the requirements of the Personal Data (Privacy Ordinance) (Cap. 486 of the Laws of Hong Kong) (“PDPO”). We are equally committed to ensuring that all our employees and agents uphold these obligations. This Privacy Policy applies to all Services we provide. To the extent of any inconsistencies between this Privacy Policy and another policy that is specifically applicable to any products or services we provide to you, such policy shall prevail; otherwise, this Privacy Policy shall prevail. Before using our Services, please make sure that you have read carefully and understand this Privacy Policy in full. By using our website, you consent to our Privacy Policy. If you do not agree to any term or condition within this Privacy Policy, you should immediately stop using this Platform. If you have any questions, comments, or suggestions in connection with this Privacy Policy, you may contact our Data Protection Officer.

Section 1 Personal Data. If you are a user of the services of Lurk Tech International Limited, the data (“Customer Personal Data”) which we may collect includes, without limitation, your: a) Full legal name (including former name, and names in English and Chinese, if applicable); gender; date of birth; nationality; country of residence; contact number; e-mail address; residential address; passport number; other identity documentation; country of tax residence; Tax ID; b) Proof of identity, facial recognition data; c) Proof of residence; d) Employment information; e) Financial information; f) Transaction information, such as the details of your historic transaction with us; and g) Proof of source of fund and/or wealth

Section 2 Collection, Use and Disclosure of Customer Personal Data. We generally collect Customer Personal Data in the course of or in connection with your registration application with us, or via an Authorized Signatory or Authorized Trader of you to disclose your Customer Personal Data to us (collectively refers to “Authorized Representative”), after (i) you (or your Authorized Representative) have been notified of the purpose for which the data is collected, and (ii) you (or your Authorized Representative) has provided written consent to the collection and usage of Customer Personal Data for those purposes. You agree that any provision of Customer Personal Data to us is done knowingly and on an informed basis by you or your Authorized Representative. We shall seek your consent before collecting any additional Customer Personal Data and before using your Customer Personal Data for a purpose which has not been notified to you (except where permitted or authorised by law). Customer Personal Data will be collected and used by us

for the following purpose and we may disclose the collected Customer Personal Data to our affiliates, group companies, advisers, parties providing products and/or services to us (including, without limitation, information technology systems suppliers, Know-Your-Client and Anti-Money Laundering compliance service providers), government agencies, regulatory authorities and related companies where necessary for the following purposes: a) To maintain legal and regulatory compliance; for example, to comply with anti-money laundering and terrorist financing laws across jurisdictions (you understand that we may share your Customer Personal Data to our affiliates and group companies for know-your-client and anti-money laundering purposes, and should you choose to engage the services of our affiliates or group companies, you may or may not be required to provide

additional Customer Personal Data); b) To enforce the conditions and terms of this Privacy Policy and other agreements (where applicable); c) To assess and evaluate your eligibility for registering with us; d) To perform obligations under or in connection with the provision of goods or services to you; e) To improve our products/services, marketing or customer relationships; f) Direct marketing and sending you updates of our products/services, benefits, promotions and rewards through SMS, e-mail address and/or contact number you provided to us from time to time, unless you have opted not to receive such information; and g) To facilitate our compliance with any laws, customs and regulations which may be applicable to us. If you are representing beneficial owners of an entity or other individuals, you must notify them of the purposes. We may ask you for proof of such notification. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, this Privacy Policy) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any agreements with you). We shall only process, use or disclose Customer Personal Data: a) Strictly for the purposes of fulfilling our obligations and providing the services required under this Privacy Policy and for purposes as disclosed above; or b) With your prior written consent; or c) When required by applicable laws or regulations, but we shall notify you if permitted under such laws or regulations. Section 3 Information from Third Party Sources. From time to time, we may obtain information about you from third party sources as required or permitted by applicable laws and regulations, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms. We may obtain information about you from public databases and ID verification partners for the purposes of verifying your identity. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. Section 4 Personal Data Sharing with Third Parties. We take care to allow Customer Personal Data to be accessed only by those who require such information in order to perform their tasks and duties, and to share with third parties who have a legitimate purpose for accessing it. We will only share such information in the following circumstances: a) We may share Customer Personal Data with third-party identity verification services in order to meet our obligations

under the applicable laws, regulations and policies; b) We may share Customer Personal Data with service providers under contract who help with parts of our business operations. This may include but is not limited to bill collection, marketing, customer support and technology services; and c) We may share Customer Personal Data with law enforcement, government bodies, regulatory bodies or other third parties when we are required to do so under the applicable laws, regulations and policies, or when we believe in good faith that the disclosure of Customer Personal Data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of this Privacy Policy or any other agreements. Section 5 Retention of Personal Data. We may retain Customer Personal Data for as long as it is necessary to fulfil the purposes listed in this Privacy Policy or as required or permitted by applicable laws. We will cease to retain Customer Personal Data or remove the means by which the data can be associated with Data Subject, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the Customer Personal Data were collected and are no longer necessary for legal purposes. Section 6 Protection of Personal Data. To safeguard Customer Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and use of privacy filters to secure all storage and transmission of Customer Personal Data by us, and disclosing Customer Personal Data both internally and to our authorised third party service providers and agents only on a need-to-know basis. You should be

aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of Customer Personal Data and are constantly reviewing and enhancing our information security measures. Section 7 Access and Correction of Personal Data. You have a right to request access to and correction of your Customer Personal Data in accordance with the PDPO. If you wish to make (a) an access request for access to a copy of the Customer Personal Data which we hold about you or information about the ways in which we use or disclose Customer Personal Data, or (b) a correction request to correct or update any of Customer Personal Data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request. We will respond to your access request as soon as reasonably possible. Should we not be able to respond to your access request within a reasonable period of time after receiving your access request, we will inform you in writing within a reasonable of the time by which we will be able to respond to your request. Section 8 Transfer of Personal Data Outside Hong Kong. Customer Personal Data provided by you, or copies of which, will be disclosed or transferred to parties relevant and necessary for the purposes as stated in section 2 above. We generally do not transfer Customer Personal Data to countries outside of Hong Kong. However, some of our service providers, affiliates and group companies, may store, transfer, and otherwise process Customer Personal Data outside Hong Kong for the purposes set out above. If we do so, we will take steps to ensure that your Customer Personal Data continues to receive a standard of protection that is at

least comparable to that provided under the PDPO. If this Privacy Policy is entered to on behalf of an entity, you confirm that all beneficial owners of that entity consent to the transfer of Customer Personal Data outside of Hong Kong for the abovementioned purposes. We may require you to furnish proof of such consent. Section 9 Accuracy of Personal Data. We generally rely on the fact that Customer Personal Data provided by you (or your Authorised Representative) is complete, accurate and up to date. In order to ensure that Customer Personal Data provided by you is current, complete and accurate, you should update us if there are changes to such Customer Personal Data by informing our Data Protection Officer via email at the contact details provided below. Section 10 Consent and Withdrawing Consent. By providing Customer Personal Data to us for registering and/or by entering into this Privacy Policy, you acknowledge that you have read, understood, and agreed to all terms and conditions of this Privacy Policy, and consent to the collection, use, disclosure, and/or processing Customer Personal Data for all the purposes referred to in this Privacy Policy. The consent will remain valid until such time it is being withdrawn by you in writing. You can at any time withdraw your consent to the collection, use or disclosure, and/or processing of Customer Personal Data by giving us written notice via email to our Data Protection Officer at cs@newhuotech.com. Upon the receipt of the request, we will inform you of the likely consequences of withdrawing consent within 30 days from the day we receive your withdrawal request. Upon your withdrawal, we will cease collecting, using or disclosing the Customer Personal Data, as the case may be, unless the collection, use or disclosure of the Customer Personal Data without consent is required or authorised under the PDPO or any other applicable laws or regulations. Section 11 Use of Cookie. A cookie is a small file (or record in a file) which the website can send to your browser which may then store it on your computer's hard drive. We use cookies to improve our website by tracking your visits to our website and recognising your web browser when you are a repeat visitor so that we can gather statistics on new and repeat visitors as well as to process transactions and services conducted through websites. Cookies also allow us to make our website more user friendly by allowing us to save registration and subscription details or passwords so that you do not have to re-enter every time you visit our website. Notwithstanding the above, you do not have to accept cookies and you should read the information that come with your web browser software to see how you can set up your web browser to notify you when you receive a cookie and to

give you the opportunity to decide to accept or reject it. Should you choose to block the use of cookies, some functions of our website may not work properly. Section 12 Third party links. We may provide hyperlinks to other locations or websites on the Internet ("Third Party Websites"). Any link you make to or from the Third Party Website will be at your own risk. Any use of the Third Party Website will be subject to and any information you provide will be governed by the terms of the Third Party Website, including those relating to confidentiality, data privacy and security. Unless otherwise expressly agreed in writing, we are not in any way responsible or liable for the goods and services offered by the Third Party Website. We do not endorse, recommend, approve, guarantee and makes no warranties, representations or undertakings relating to the content of the Third Party Website. We disclaim liability for any loss, damage and any other consequence resulting directly or indirectly from or relating

to your access to the Third Party Website or any information that you may provide or any transaction conducted on or via the Third Party Website or the failure of any information, goods or services posted or offered at the Third Party Website or any error, omission or misrepresentation on the Third Party Website or any computer virus arising from or system failure associated with the Third Party Website. We are not a party to any contractual arrangement entered into between you and the provider of any Third Party Website unless otherwise expressly specified or agreed. Section 13 Data Protection Officer. We may update our Privacy Policy at any time by posting the changes on our website. You may contact our Data Protection Officer via cs@newhuotech.com. if you have any enquiries or feedback on our data protection and privacy policies and procedures.