

PRIVACY POLICY

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RealMeChongqing Mobile Communications Co., Ltd. (registered address: No.2 Building, No.24 Nishang Boulevard, Huixing Block, Yubei District, Chongqing; registered number: 91500112MA6016FM5C) and its affiliated companies (including but not limited to ASCENSION INTERNATIONAL TRADING CO., LIMITED) (together referred as realme or we) are committed to protecting and respecting your privacy. Therefore, we have developed the Privacy Policy that covers how we collect, use, disclose, transfer, and store your personal data while you use our websites, mobile applications, or services. Please carefully read and familiarise yourself with our privacy practices before using our products (or services) or submitting your personal data.

This policy will help you understand the following:

- 1. Definitions**
- 2. How We Use Cookies and Similar Technologies**
- 3. How We Collect and Use Your Personal Data**
- 4. How Long We Keep Your Personal Data**
- 5. How We Disclose Your Personal Data**
- 6. How We Protect Your Personal Data**
- 7. Your Rights with Regards to Your Personal Data**
- 8. How We Process Children’s Personal Data**
- 9. Third-Party Service Providers and Their Services**
- 10. How Your Personal Data Is Transferred Globally**
- 11. How This Privacy Policy is Updated**

1. **Definitions**

- 1.1 **“Personal Data”** refers to any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, either directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2. **How We Use Cookies and Similar Technologies**

- 2.1 What are “cookies”?

Cookies are small text files that are transferred from our websites, applications or services and stored on your device. realme's websites, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. Cookies not set by our website will not be accessible to us.

2.2 How long will cookies stay on your device:

- (A) **Session cookies** – such cookies will only last until your browser is closed and will not be stored on your hard drive. Session cookies are generally used to track the pages on a site that you visit so that information can be customised in relation to a specific visit to a page of the website.
- (B) **Persistent cookies** – such cookies will be stored on your hard drive until you actively choose to delete them or the cookie reaches its expiry date. We limit the lifetime of our cookies to a maximum of 13 months as required by law and so you will be asked about your cookie preferences again no later than 13 months since the last time we asked you. Such cookies can be used to store your preferences when you use our website.

2.3 We will use the following types of cookies:

- (A) **Strictly necessary cookies** – These are cookies that are required for the operation of our website. Such cookies may include, for example, cookies that enable you to log into secure areas of our website, use of a shopping cart or e-billing services.
- (B) **Analytical or performance cookies** – These are cookies that permit us to count the number of visitors to our website and to inform us about how visitors are using our website in order to provide improvements to the way that this site works.
- (C) **Functionality Cookies** – These types of cookies are used to recognise you when you visit or return to our website. This allows realme to personalise the content of our website for you and to recognise your preferences when you visit our website (e.g. choice of language).
- (D) **Targeting Cookies** – These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

2.4 Our use of cookies shall be limited to the following purposes:

- (A) realme and its partners use cookies or similar tracking technologies to better understand the functionality of our mobile software on your device, understand how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personal data you may submit within our mobile applications.
- (B) realme and its partners use cookies or similar tracking technologies to analyse trends, manage the websites, track users' movements on the websites, and to gather aggregate demographic information about our user base.

- (C) Many web browsers have the “Do Not Track” function, which can make a “Do Not Track” request to website. If “Do Not Track” is enabled on your browser, all of our websites will respect your choice.
- (D) We automatically collect certain information to analyse cumulative trends and manage our website. This information may include Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, the files viewed on our website (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data.

2.5 Clearing/disabling cookies

Managing cookies and cookie preferences settings must be done within your browser's options/preferences. Here's a guide on how to do this in popular browser software:

- (A) Microsoft Internet Explorer
- (B) Microsoft Edge
- (C) Mozilla Firefox
- (D) Google Chrome
- (E) Safari for macOS
- (F) Safari for iOS

2.6 More information about cookies

For more information about cookies and instructions on how to adjust your browser settings to accept, delete or reject cookies, see www.allaboutcookies.org.

3. **How We Collect and Use Your Personal Data**

3.1 realme collects information to operate more efficiently and to provide you with the best product experience. Our channels for collecting personal data include: (1) you provide information directly; (2) data we record about how you interact with our products; and/or (3) obtain data about you from third parties.

3.2 The data we collect depends on the environment in which you interact with realme, the choices you make, including your privacy settings and the products and functions that you use. It is worth noting that we usually treat the shipping area recorded on the mobile phone box as the actual location where your phone is used and comply with local laws and regulations, including those for data protection.

3.3 Personal data we collect about you

- (A) **Information directly provided by you to us or one of our affiliates**

This includes information about you that you may need to give us in order for us to provide our services to you. For example:

- (1) We will request you to complete your personal profile when you fill out a warranty card/electronic warranty card in order to use our products or services. In these services, we may ask you to provide personal data to set up an account or a personal profile. The personal data will include your name, date of birth, mobile number, email address, username and password created and photos.
- (2) If you order products from us, request a return, repair or refund, or use a paid service, we may collect your delivery details, bank account number, credit card details, billing address, information for credit check and other financial information, contact and communication records, etc., in order to process your order. If you do not provide us this information, you may not be able to order products, request return, repair or refund, or use our paid services.
- (3) Some of our services allow you to communicate and share information with others. For technical purposes, the communicated or shared content may be transmitted through our IT systems and stored in those systems.
- (4) Face recognition and fingerprint unlocking enables rapid unlocking of your device with your pre-recorded facial or fingerprint information. To achieve this, you need to provide your facial features or your fingerprint information from different angles into a device that you have purchased from us. We will not upload your facial features or fingerprint information to our servers, which means that we may not disclose such information to any third party or for any other purpose.

We may ask you to provide personal data under other limited circumstances, including participating in prize draws or competitions, participating in promotion or marketing activities organised by us or our business partners, completing questionnaires, participating in user forums or blogs hosted by us or our business partners. The information you provide could help us design and improve the products, personalise your shopping experience, and provide purchase suggestions. We may match your information with third-party data to better understand your needs.

(B) Information we collect or generate about you

In addition to the information you provide to us, we may also collect information about your use of our services through software in your device and other means. For example, we may collect:

- (1) **Device information** — such as device name, device model, region and language settings, device identification number (IMEI number, etc.), device hardware information and status, usage habits, IP address, Mac address, operating system version, and settings of the device used to access our service(s) or those of a third-party provider.
- (2) **Log information** - such as the time for using the services, how long the services are used, search terms entered through the services, and error log information of the device. Due to the design features of the Android

system, when you choose to share the device's error log information with us, the Android system may sometimes send us your personal data, such as phone number, email address, Facebook account, etc. We promise not to use this information to identify individuals, and we will periodically remove such data after analysis of the error log data (usually within 30 days of collection).

- (3) **Location information** — such as the device's GPS signal or information about nearby WiFi access points and cell towers, ID of the device's location, network service provider ID, which may be sent to us when you use certain services. We will ask you which applications you want to enable location-based services for. You can modify the location settings of your device from the device settings, such as changing or disabling the method or server used in location-based services, or modifying the accuracy of your location information, hence changing the location information provided to realme.
- (4) **Voice information** — for example, the audio that we record (and may store on our servers) when you use voice commands to control the service.
- (5) **Album information** — for example, to provide you with the function to display photo locations as well as to classify your photos and videos, we need to collect the latitude and longitude information of your photo and video files; when you search for a certain picture, we will collect the term you entered and the number of pictures identified locally.
- (6) **Camera** - To ensure that the camera app works normally, we collect operational data (e.g., how many times you use the app), information about your device (e.g., IMEI, device model, IP address, operating system version), parameters of photos taken (e.g., photosensitivity, number of faces captured), and available space on the device.
- (7) **Other information about your use of the service** - such as the version of the app used, websites visited, and how you interact with the content provided through the service.

Please note that we may cooperate with third-party service providers to achieve the above functions, for instance, third-party service provider may provide voice to text conversion services on our behalf, in that case, the third-party service provider may receive and store certain personal data. These third parties will not use this information for any other purpose and will only act on our own instructions.

(C) **Information we obtain from other sources**

Where permitted by law, we may collect data about you from public or commercial sources and may combine them with other information received or related to you. If you choose to use our services by logging in with third-party accounts, we may also collect your public information from these services, such as your username, profile picture, etc

3.4 **How we use your personal data**

- (A) We may process your personal data for the purposes described in this Privacy Policy, to perform our obligations to you under our User Agreement and/or Terms of Sale,
- (1) with your prior explicit consent which can be withdrawn at any time at your request;
 - (2) so that we can perform or carry out a contract with you in relation to our products and/or services;
 - (3) for compliance with a legal obligation to which realme is subject;
 - (4) where necessary for the purposes of our legitimate interests pursued by realme or a third party to whom it may be necessary for realme to disclose information. Where we process your information in reliance on such grounds, we will only do so where we have appropriately balanced such interests against your right to privacy. Such legitimate interests may include (without limitation), as follows:
 - (a) **Providing and improving our products** - The personal data we collect will be used to provide you with realme's products and services, process your orders or fulfill the contract between you and realme to ensure the functionality and safety of our products and services, to verify your identity, to prevent and investigate fraud or other improper use.
 - (b) **Customer Support** - We use data to diagnose product issues, repair customer devices, and provide other customer care and support services. Your mobile user identification information, mobile device's unique identifier, and geographic location information can be used to activate your warranty service and specific software licenses and may be used to invite you to participate in surveys. We also use this information to improve our products and analyse the efficiency of our work. However, we will not use this information to track your location. We may also collect your email address to reply your questions or comments raised in the "Contact Us" section of our websites.
 - (c) **Product Improvements.** We use data to constantly improve our products, including adding new features and functions. For example, we use error reports to improve security features and use usage data to determine cell phone sequencing. We use mobile phone numbers obtained through offline sales channels, electronic warranties, and account registrations to conduct survey and return visit to users in order to improve user experience.
 - (d) **Advertising.** The personal data we collect will be used to personalise the product and to provide you with more tailored services, for example: your information can be used to recommend, and display content and advertisements tailored to you on our services, or be used to conduct research and pay return visits to customers. In order to improve our products or services, only with your prior consent, we may match your personal data (including but not limited to the de-identified location information so that it is no

longer associated with a particular person) with third-party data to form a user profile so that we can develop products or deliver targeted product information to you (through post, email, phone and fax).

(e) **Commercial Promotion Activities.** If you participate in prize draws, contests or similar promotional activities held by realme, we will use the personal data you provide to manage such activities.

(B) We may also process certain forms of “sensitive” personal data (in particular, biometric information where you choose to use such information for the purposes of securing your access to one of our devices) under the following lawful bases:

- (1) with your prior explicit consent; and/or
- (2) where the processing is necessary in order for us to comply with legal or regulatory obligations (which include generally accepted standards of good practice within our industry) relating to the prevention of fraud, crime and/or other unlawful acts, dishonesty, malpractice or other seriously improper conduct.

3.5 realme will strictly abide by the terms of this Privacy Policy and any updates to it (which will be notified to you in advance) where it uses your personal data. Your personal data will only be used for the purposes determined at the time.

3.6 When we want to use the information for other purposes not covered by this policy, we will obtain your consent in advance. When we want to use information which was collected for a specific purpose for other purposes, we will obtain your consent in advance. We will not provide personal data and behavioral data to third parties without your consent.

4. **How Long We Keep Your Personal Data**

Our retention period for personal data is the minimum time necessary to realise the purpose stated in this Privacy Policy and/or the specific service privacy statement unless a longer retention period is required by law. As such, how long we retain your personal data will vary depending on our legal obligations and the purposes for which we are using it. Beyond the above retention period, we will delete or anonymise your personal data.

5. **How We Disclose Your Personal Data to third parties**

5.1 At times realme may make certain personal data available to its affiliates or to other third parties that work with realme.

5.2 We may share your personal data with realme's affiliated companies. If the affiliated companies or authorised partners wish to change the purposes of processing personal data, they will re-seek your consent.

5.3 We may share your personal data with such authorized partners / affiliated companies in any of the following circumstances:

- (A) if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes;
- (B) if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer;
- (C) where such authorised companies or affiliated companies (for example the providers of electronic data storage services) are transferred personal data in the context of providing their services to us; or
- (D) where a merger, acquisition or bankruptcy liquidation takes place, if the transfer of personal data is involved, we will ask the new entity which obtains your personal data to be subject to this Privacy Policy, otherwise we will ask such entity to obtain your consent again.

We will only share your personal data for lawful, legitimate, necessary, specific and clear purposes, and only personal data necessary for service provision will be shared. Our partners are not allowed to use the shared personal data for any other purposes other than those set out in this Privacy Policy or for purposes that are provided in our instructions to them. We will take steps to ensure that the personal data is accessed only by employees of such third parties that are subject to appropriate confidentiality obligations and on a “need to know” basis.

5.4 We will only publicly disclose your personal data under the following circumstances:

- (A) after we obtain your explicit consent; or
- (B) disclose in accordance with laws or according to regulatory requirements: we may publicly disclose your personal data if it is compulsorily required by applicable laws or other regulatory requirements, such as to comply with a subpoena or other legal proceedings, legal actions or government agencies, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

6. **How We Protect Your Personal Data**

6.1 We have taken reasonably practical and technical measures to protect the collected information related to the service. However, please note that although we have taken reasonable measures to protect your information, no websites, Internet transmissions, computer systems or wireless connections are absolutely secure.

6.2 We have taken safeguarding measures in accordance with industry standards to protect the personal data you have provided to us in order to prevent data from unauthorized access, public disclosure, use, modification, damage or loss. We take all reasonably practical measures to protect your personal data. In particular:

- (A) We will de-identify your personal data to mitigate the risk that other organizations or individuals may identify you on the basis of that personal data. We use SSL to encrypt many services. We periodically review practices regarding information collection, storage and possessing (including physical security measures), to prevent various systems from unauthorized access.

- (B) We only allow realme's employees and personnel of authorized service companies who need the personal data to perform their roles in the context of providing our services to you, and they are subject to strict contractual confidentiality obligations. If they fail to perform these obligations, they may be held liable or their relationship with realme may be terminated.
- (C) The security of your information is extremely important for us. Therefore, we endeavor to ensure the security of your personal data and implement measures such as full security encryption during storage and transmission to prevent your information from unauthorized access, use, or disclosure. At the same time, no one can access the specific content of some encrypted data except the users themselves.
- (D) When we transmit and/or store special categories of your personal data, we will use security measures such as encryption. When we store personal biometric information, we will process it using technical measures before storing it, for instance, only storing summarized personal biometric information.

7. **Your Rights with Regards to Your Personal Data**

- 7.1 realme will respect your legal rights relating to your personal data. Below are the rights that you have under law, and what realme does to protect those rights. Please note that for the sake of security, we may ask you to verify your identity before processing your request. In principle, we do not charge a fee for your reasonable request. However, for multiple and repetitive requests that exceed the reasonable limit, we may charge a reasonable fee to cover some costs depending on the nature of the request.
- 7.2 We may refuse requests that are manifestly unfounded, unreasonably repetitive, or require excessive technical means (for instance, require the development of new systems). In addition, elements of your request may not be able to be adhered to on the basis that it directly concerns significant issues of public interest or may cause serious damage to the legitimate rights of you or other individuals or organisations.
- 7.3 **The right to be informed.** realme is publishing this Privacy Policy to keep you informed as to what we do with your personal data. We strive to be transparent about how we use your data. Alongside this Privacy Policy, you also have the right to obtain information regarding the processing of your personal data and access to the personal data that we hold about you at any time.
- 7.4 **The right to restriction of processing.** You may ask realme to restrict how we process your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict how we process your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request. If you have any questions, you may contact us at privacy@realme.com.
- 7.5 **The right to data portability.** To the extent permitted by law, you may access your personal data in a structured, commonly used and machine-readable format and/or request that we transmit personal data to a third party where this is technically feasible. For example, if you decide to switch to a new provider, this will enable you to move, copy, or transfer your personal data between our IT systems and those of the third party in a safe and secure manner, without affecting its usage. If you have any questions, you may contact us at privacy@realme.com.

- 7.6 **The right to object.** You may object to realme processing your data even if it is based on our legitimate interests, the exercise of official authority, direct marketing (including data aggregation), and processing for the purpose of statistics. If you have any questions, you may contact us at privacy@realme.com.
- 7.7 **The right to withdraw consent.** The implementation of each business function requires certain basic personal data. You can give or withdraw your consent at any time for the collection and use of additional personal data collected. If you withdraw your consent, we will not continue to provide you with the corresponding services for which you have withdrawn your consent.

We will stop processing your data after you withdraw your consent. However, your decision to withdraw consent will not affect personal data processing based on your consent before it is withdrawn.

You can change the scope of your consent on what personal data we can continue collecting or withdraw your consent by deleting the information, turning off device features, etc. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than your explicit consent) to do so.

- 7.8 **The right to object automated individual decision-making.** You have right not to be subject to a decision based solely on automated processing, including profiling. If these decisions significantly affect your lawful rights, you are entitled to ask for an explanation at privacy@realme.com, which we will respond to and take appropriate measures to resolve, as necessary.
- 7.9 **The right to complaint.** You have the right to lodge a complaint with the data protection authority of the country you are in if you think that any of your rights have been infringed by us .
- 7.10 **Other rights.** If you have additional questions about the rights to the personal data you have, you can contact us at privacy@realme.com and we will respond to your request as soon as possible.

8. **How We Process Children's Personal Data**

- 8.1 Our products, websites and services are mainly adult-oriented. A child should not create his/her own user account. We treat anyone under 16 years old (or equivalent minimum age in relevant jurisdiction) as a child. For the personal data of children collected with their parents' consent, we will take steps to verify the identity of the relevant parent providing consent on behalf of the child and we will only use or disclose this information as permissible by law, with the expressed consent of the parents or guardians, or when it is necessary to do so in order to protect the children concerned.
- 8.2 When we find that a child's personal data is collected without competent consent, we will delete the relevant data as soon as reasonably possible.

9. **Third-Party Services Providers and Their Services**

- 9.1 realme websites, products, applications, and services may contain links to third-party websites, products, and services. You can choose whether to access websites, products and services provided by third parties or not. For example, the "follow us" function in the official website will lead you to access to our official accounts in social

network platforms where you can choose to consult the marketing or promotional information published by realme.

- 9.2 We have no control over third-party privacy and data protection policies and such third parties are not bound by this Privacy Policy. Before submitting personal data to third parties, we would recommend that you refer to the applicable privacy policies of such third-parties.

10. **How Your Personal Data Is Transferred Globally**

- 10.1 In principle, the personal data collected and produced within the territory of European Union is stored within the territory of the European Union.

- 10.2 Nevertheless, we provide products and services through our resources and servers around the world. This means that to ensure the uniqueness of your account so that it can be used globally without being duplicated, after acquiring your consent, and after your personal data (i.e., IMEI, mobile phone number, email address, and user name) have gone through de-identification, they might be transmitted to or accessed from a country/region outside of the jurisdiction of the location where you use the products or services.

- 10.3 When your personal data is transferred to a country outside the European Economic Area, we will ensure that appropriate protection measures are taken, for instance:

- (A) The recipient of the personal data is located within a country that benefits from a full “adequacy” decision of the European Commission under Article 45 of the General Data Protection Act (**GDPR**);
- (B) The recipient of the personal data may have signed standard data protection terms approved by the European Commission under Article 47 of GDPR, obliging them to protect your personal data; or
- (C) The recipient of the personal data is located in the USA but is also a certified member of the EU-US Privacy Shield scheme.

In the absence of such appropriate data protection measures, we will ask you to expressly consent to the transfer of personal data across borders, and at the same time implement security measures such as encryption or de-identification to protect the security of your personal data.

For more information on the protection measures related to the transfer of personal data outside the European Economic Area, please contact us at email: privacy@realme.com.

11. **How This Privacy Policy Is Updated**

We reserve the right to update or modify this Privacy Policy from time to time. We will send you update notices in advance through different channels. If we make any material changes to this Privacy Policy, we will notify you by email (sent to the e-mail address specified in your account) if an email address is provided by you, otherwise we will notify you by posting notice on this website or within our devices prior to the change becoming effective.

This Privacy Policy allows adjustments, but we will not diminish your rights under this Privacy Policy without your express consent.

If you have questions or concerns regarding our Privacy Policy or practices, please contact our Data Protection Officer at the following address:

Building 2, NO.24, Nishang Boulevard, Huixing Block, Yubei District, Chongqing, PRC China

Email: privacy@realme.com