

Privacy Policy

(For Non-Chinese Version WPS Mail Running on Android)

Last Updated Date: Mar. 31, 2020

Introduction

Your privacy is important to Beijing Kingsoft Software Inc. and its affiliates ("we" or "Kingsoft"), and to protect your privacy we developed a Privacy Policy, which explains how we use any personal data ("information") we collect about you. It describes:

- what information we collect about you;
- how we use your information;
- who we share your information with;
- collection and use of Non-Personal Data;
- your rights regarding our use of your information;
- how long we keep your information; and
- how to contact us.

We provide this Privacy Policy to help you understand how we collect, use, disclose, transfer, and store your information that we access in order to provide our "Services". When we say Services in this Privacy Policy, we mean our websites located at <http://www.wps.com>, <http://note.wps.com/> and other websites operated by us through which our Services are provided ("Sites"), our mobile device applications ("Apps",), and our software product available for use via the Apps (herein refers to the specified WPS Mail software, the "Product"). This Privacy Policy applies to only those websites, product, services and applications included within the "Services" and does not apply to any third-party websites, product, services or applications, even if they are accessible through our Services.

Revision to this Privacy Policy

Any information that is collected via our Services is covered by the Privacy Policy in effect at the time such information is collected. We may revise this Privacy Policy from time to time in accordance with the law. If we make any material changes to this Privacy Policy, we will notify you of such changes by posting them on our websites or by sending you emails or other notifications, and we will update the Last Updated Date above to indicate when such changes became effective.

What Information We Collect about You

Your information is the data relating to you, which can be used to identify you directly or indirectly. We collect and process your information to provide and improve our Services for you, to administer your use of our Services, and to enable you to enjoy and easily navigate our Services. We will be transparent about the collection and use of your information so that you can make informed decisions. You are not

required to provide us with the information that we have requested, but if you choose not to do so, in many cases we will not be able to provide you with our Product and Services or to respond to any queries you may have.

We collect the following information about you:

Basic Subscription Information. If you create an account in connection with your use of any of the Services (“**Account**”), either through our Sites or when you download and install our Product, we’ll collect certain information about you, including your name, email address, postal address, phone number and credit card information (“**PII**”/Personal Data).

Information Related to Use of the Services. Our servers automatically record certain data about how a person uses our Services (“**Log Data**”), including that of both Account holders and non-Account holders (either, a “**User**”). Log Data may include certain data such as a User’s IP address, browser type, operating system, the web page that a User was visiting before accessing our Services, the pages or features of our Services to which a User browsed and the time spent on those pages or features, search terms, the links on our Services that a User clicked on and other statistics. We use Log Data to administer the Services and we analyze (and may engage third parties to analyze) Log Data to improve, customize and enhance our Services by expanding and tailoring features and functionalities of our Services to our Users’ needs and preferences. We may use a person’s IP address to generate aggregate, non-identifying data about where our Services are used. In addition, for the aforementioned purposes and providing better access to and experience of our Services for you, we may allow certain third parties to collect and use your information.

At the same time, our Services may include third-party tracking tools without limitation to SDKs (software development kit) which belong to part of the third-party services providers on behalf of Kingsoft to collect and analyze technical data from you. Kingsoft or aforementioned third-party services providers on behalf of Kingsoft collect such data not to identify any specific individuality or personality of yours but to understand how you access and use the Services at general manner. Such data helps us provide the Services for you, learn how the Services are used, and make the Services more useful to you. The technical data collected by Kingsoft and the aforementioned third-party services providers may include:

- Your devices or software data, such as your Internet Protocol (“**IP**”) address, device identifier, region and language settings, network settings and status, operating system, device storage, Android ID and HDID, browser or other software used to connect our Services;
- Your operation data, such as the aggregate number of time, frequency and activity of your use of our Services, and when you use contact management functions or interact with other persons or institutions through our Services, we may collect

data relating to your contacts and your relationship with such contacts;

- The metadata shared by you, such as shooting, uploaded sharing photos or videos, as well as exact date, time, place, and other data stored when using our Services.

Information Sent by Your Mobile Device. We may collect certain data sent by your mobile device when you use our Services, such as a device identifier, the number and type of your devices you use to connect to the Service, user settings, device storage, AndroidID, OAID, and the operating system of your devices (e.g., iOS, Android etc.), as well as data relating to your use of our Services.

Information Received from Our Partners and Other Third Parties. We also may link your subscription information with the data information we receive from our partners or other third parties (such as Google Analytics, Firebase, Facebook Analytics, Umeng, Flurry etc.) to help smoothly facilitate our Services for you, to better understand your needs and to provide you with better Services experience.

Contact Information for Technical Support. We also may record your email, telephone and dialogue contents when you contact us for service support by sending emails or calling, to help us keep contact with you for updates and support to resolve your queries for use of our Services.

How We Use Your Information

We are committed to protecting the privacy of your information. We use your information:

1. To enter and perform a contract with you to provide the Services, or to perform any steps you require from us before entering into a contract to provide the Services.
 2. To pursue our legitimate interests, which include:
 - (a) Helping us understand how you access and use our Services, in order to improve our existing Services and develop our new Services for you. This may include: (i) testing and applying new product or system versions, patches, updates and upgrades; (ii) monitoring and testing system use and performance; and (iii) resolving bugs and other issues you have reported to Kingsoft. Any copies of Services data created for these purposes are only maintained for time periods relevant to those purposes.
3.
 - (b) Providing troubleshooting, customer support, identity authentication and protecting the security of our Services;

4.

(c) Carrying out fraud detection, archiving and backup in connection with the provision of our Services;

5.

(d) Improving customer communications and ensuring that we provide secure, quality Services to our customers;

6.

(e) Contacting you and sending you information about: (i) product and Services or advertisements that may be of interest; and (ii) assessing the effectiveness of and improving advertising and other marketing and promotional activities on or in connection with our Services when your account is subscribed to an official account. If you don't want to receive such information, you can opt out at any time.

7.

(f) Allowing you to participate in surveys about our Product and Services. If you participate in a survey, we may request certain personally identifiable information from you. Participation in these surveys is voluntary and you therefore have a choice whether or not to disclose such information. We may use a third-party services provider to conduct these surveys and such third-party services provider will be prohibited from using your personally identifiable information for any other purpose.

8.

9. To comply with our legal obligations and establish, exercise or defend our legal rights.

10. For other purposes which you give your consent and/or of which we have informed you.

Please note that for your better experience through our services and the improvement of our Services, with your explicit consent, your information collected through our Services may, subject to this Privacy Policy, be reasonably used for the provision of our other Services (including in an aggregated or individualized manner provided by or cooperated with any third party).

Collection and Use of Non-Personal Data

“Non-Personal Data” is the data that cannot be used to identify you. We collect Non-Personal Data to understand how people use our Product and Services and to help us improve our Services to better satisfy customer needs. We may, at our own discretion, collect, use, process, transfer or disclose Non-Personal Data for other purposes as well.

We will keep your information and Non-Personal Data separate and use each independently. If we do combine Non-Personal Data with your information, the combined data will be treated as personal data. We will protect the privacy of your information through strong security and encryption and in accordance with this Privacy Policy.

Who We Share Your Information with

We will not share any information that we have collected from or about you except as described below and we will share only necessary information on the minimum basis:

Information Disclosed in Connection with Business Transactions. Information that we collect from our users, including PII, is considered to be business assets of ours. Thus, if we are engaged with a third party in a transaction such as merger, acquisition or sales of assets or if our assets are acquired by a third party in the event we go out of business or enter bankruptcy, some or all of our assets, including your information, may be disclosed or transferred to a third party acquirer in connection with such transaction.

Information Required by Law. We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate: (i) to respond to claims, legal process (including subpoenas); (ii) to protect our property, rights and safety and the property, rights and safety of a third party or the public in general; and (iii) to stop any activity that we consider illegal, unethical or legally actionable.

In addition we may share your information with companies in the same group as us, as well as other third parties with your informed consent.

Transnational Data Transfer

It may be necessary for us to transfer your information to any third party affiliated to us or with whom we have a cooperative relationship, and such information may be maintained on computers and/or other servers located outside of your state, province, country or other governmental jurisdiction in whole or in part where the privacy laws and technology level may not be as protective as those in your jurisdiction (“**Cross-border Transmission of Information**”). If you want to know more about such Cross-border Transmissions of Information, please send your e-mail to privacy@wps.com. We will duly handle your response but please note that our Services may not be available to you if you refuse Cross-border Transmission of Information.

We comply with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (“**Framework**”) regarding the collection, use, and retention of personal data. When you and Kingsoft have agreed by contract that your information from the European Economic Area (“**EEA**”) or Switzerland will be transferred and processed pursuant to the Privacy Shield for the relevant services, for conducting these activities on behalf of EEA or Swiss customers, we will hold and process your information provided by the EEA or Swiss customer at the direction of the customer with discretion under the Framework. We will then be responsible for ensuring that third parties acting as an agent on our behalf do the same.

Your Rights in relation to Our Use of Your Information

You have rights under data protection law in relation to our use of your information, including to:

- Request access to your information, which you can do using this from privacy@wps.com;
- Update or amend your information if it is inaccurate or incomplete;
- Object to certain use of your information (which includes direct marketing, processing based on legitimate interests, and processing for purposes of scientific or historical research and statistics) on grounds relating to your particular situation;
- Request the deletion of your information, or restrict its use, in certain circumstances (for example you can request that we erase your information where the information is no longer necessary for the purpose for which it was collected unless certain exceptions apply);
- Withdraw any consent you have provided in respect of our use of your information;
- Request us to return the information you have provided to us, to use for your own purposes (often called your right to data portability) where the processing is based on your consent or for the performance of a contract, and such processing is carried out by automated means; and
- Lodge a complaint with the relevant supervisory authority.

You can exercise your right to access, update and delete your information either on your Apps and Product, or you could contact us and we will assist you to exercise your right. If you have any questions about these rights or you would like exercise any of them, please contact us by sending an email to privacy@wps.com. Additional details of how to get in touch are set out below.

Please note that if you decide not to provide us with the information that we request, you may not be able to access all of the features of the Services, without limitation as following:

- You may not be able to download, install and/or use any of our Services and/or any of their updates and upgrades.
- You may not be able to subscribe to or log in to our Services, or make any purchase of affiliated Services.
- We may not be able to be aware of your problems with our Services, and we may not be able to adequately respond to your needs and proposals.

The Security and Storage of Your Information

We take all reasonable administrative, physical and electronic measures to protect the information that we collect from or about you (including your PII) from unauthorized access, use or disclosure.

When you use our Services on your computing and mobile devices (“**Devices**”), such as by using one of our downloadable applications, some of your data will be stored locally on such Devices.

When you sync your Devices with our Service, such data will be replicated on servers maintained in the United States and Japan. This means that if you store your information in or submit data to our Sites, Apps or Product, your information will be transmitted, hosted, and accessed in countries and/or districts outside the European Union district, such as in the United States, Japan, Germany, Singapore and India.

Data privacy laws or regulations in your home country may differ from those in the places where you are located. We will collect, store, and use your information in accordance with this Privacy Policy and applicable laws, wherever it is processed.

How Long We Keep Your Information

We will keep your information for the period strictly necessary for fulfilling the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Our Policy towards Children

To protect children’s privacy and safety, we provide specific protection with regard to children’s personal data. Our Services are not directed to children under the age of 16 years (or otherwise provided by the related jurisdiction) and we do not knowingly collect personal data from children. If you are a child under 16 (or otherwise provided by the related jurisdiction), you are not permitted to use and install our product, unless your parent provides verifiable consent. If we learn that we have collected personal data of a child under 16, or we have collected a child’s personal data without first obtaining verifiable, explicit parental permission, we will take steps to delete the information as soon as we can.

Once a child downloads, installs or uses any of our Services, in whole or part, such action shall be deemed representing that his/her parents agree with our policies, terms and conditions including but not limited to this Privacy Policy.

Links to Other Sites

Our Services may contain links to websites and services that are owned or operated by third parties (each, a “Third-party Service”). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner’s or operator’s privacy policy. We’re not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third-party Services that you access.

Contact Information

Please contact us at your convenience if you have any questions about our Privacy Policy through the following ways:

E-mail contact: privacy@wps.com

Address: KINGSOFT Office Software, 530 Lytton Avenue, 2nd Floor, Palo Alto, CA 94301

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