

# SparkFly Website Privacy Policy

## SparkFly Privacy Policy

**Updated:** [September 24, 2025]

**Effective Date:** [September 24, 2025]

SparkFly (hereinafter referred to as “SparkFly”, “we”, “us” or “our”) is a next-generation marketing technology platform based on influencers and creativity under Tecdo Technology. We are committed to providing customers with the best customized marketing services. SparkFly respects and takes seriously the protection of your personal information and privacy. This Privacy Policy is designed to inform you about how we collect and process your personal information when you visit the official website of SparkFly (<https://www.sparkfly.net/>), how we protect your personal information, and how you can exercise your rights to personal information.

Before using the SparkFly platform, please carefully read and understand this Policy, with paying particular attention to the terms **highlighted in bold/underlined in bold**, and ensure that you have fully understood and agree to these terms before proceeding with your use of the SparkFly platform. **Please note that you may use the basic functions of the SparkFly platform even though you refuse to provide unnecessary personal information or data required for additional functions.**

**This Policy will help you understand the following content:**

- I. How we collect and use your personal information**
- II. How we entrust the processing of, share, transfer, and publicly disclose your personal information**
- III. How we use Cookies and similar technologies**
- IV. How we store your personal information**
- V. How we protect your personal information**
- VI. How you can manage your personal information**
- VII. Collection and use of minors’ information**
- VIII. How this Policy is updated**
- IX. How to contact us**

## **I. How we collect and use your personal**

# information

Personal information means various types of information recorded electronically or otherwise that relates to an identified or identifiable natural person, excluding information that has been anonymized.

**Sensitive personal information means personal information that, if leaked or illegally used, could easily lead to infringement of human dignity or harm to the personal safety or property security of a natural person, including biometric data, religious beliefs, specific identities, medical health information, financial accounts, tracking information, and personal information of minors under the age of fourteen.**

1. When you wish to contact us via the “Contact Us” or “Online Consultation” interface on the SparkFly Website, we will collect the information you voluntarily provide, including your name, company name, email address, WeChat ID, job title, and phone number, and we will contact you based on the information you provide.

2. When you submit a complaint or suggestion through the complaint and reporting portal on the SparkFly Website, we will collect the content you voluntarily fill in, including the subject matter of the complaint, complaint category, name and contact details of the person being complained against, product in question, complaint details, identity, email address and phone number of the complainant, and evidence materials you voluntarily upload, to enable us to promptly address your complaint. When you submit a report, we will collect the content you voluntarily fill in, including the subject matter of the report, name and contact details of the person being reported against, report category, report content, identity, email address and phone number of the reporter, and evidence materials you voluntarily upload, to enable us to promptly handle your report. **Please note that if the information you provide to us includes any personal information of others, please confirm that you have the right to provide such personal information on their behalf and inform them of reading and agreeing to this Privacy Policy.**

3. Please be advised that we may collect and use your personal information without your consent if such collection or use is:

- (1) Related to the performance of our obligations under the laws and regulations;
- (2) Directly related to national security or national defense security;
- (3) Directly related to public safety, public health, or significant public interests;
- (4) Directly related to criminal investigations, prosecutions, trials, or enforcement of judgments;
- (5) Conducted with a view to protecting significant legal rights and interests (such as life or property) of the personal information subject or any other individual but it is difficult to obtain the person’s consent;
- (6) Related to personal information which was voluntarily disclosed by the personal information subject to the general public;

(7) Made with respect to your personal information collected from legally and publicly disclosed information, such as from legal news reports, government information disclosure, and other channels;

(8) Necessary for the conclusion and performance of a contract as required by the personal information subject;

(9) Necessary for maintaining the secure and stable operation of the platform, such as identifying and dealing with product or service malfunctions;

(10) Conducted under such other circumstances as provided for in the laws and regulations.

## **II. How we entrust the processing of, share, transfer, and publicly disclose your personal information**

### **(I) Entrustment of Processing**

When necessary for the fulfillment of the services of this platform, we may entrust third-party service providers to process your personal information on our behalf so that the third-party service providers provide you with certain services on our behalf. For any third party we entrust to process the information, we will enter into a written agreement with such third party as required by the laws and regulations to set out the purpose, duration, method of processing, types of personal information, protective measures, and rights and obligations of both parties in connection with such entrustment. We will supervise their personal information processing activities, require them to process your personal information in accordance with our requirements, the constraints stated in this Policy, and any other relevant written agreements and security measures, and prohibit them from using the entrusted information for any purpose other than the entrusted processing.

### **(II) Sharing**

**We will not share your personal information with any company, organization, or individual other than us, except for:**

1. Sharing with your separate consent: we will share your personal information with other parties after obtaining your separate consent.
2. Sharing your personal information with others in accordance with the provisions of the laws and regulations or the mandatory requirements imposed by competent government authorities.
3. Sharing with our affiliates: your personal information may be shared with our affiliates to enable us to better provide services. We will only share the necessary personal information and will encrypt or anonymize your personal information as necessary, and it will be subject to the purposes stated in this Privacy Policy. If any of

the above parties intends to change the purpose of processing personal information, it will seek your authorization and consent again.

4. Sharing with our partners: in order to achieve the purposes contained in this Policy, certain of our services will be provided by our partners. We will share your personal information with our partners only for legitimate, justified, necessary, specific and explicit purposes and only to the extent necessary for the provision of services. None of our partners shall have the right to use the shared personal information for any other purposes. In the event of any change in the purpose, method, or scope of processing your personal information, we will seek your separate consent again. If you refuse to allow our partners to collect personal information necessary for the provision of services while providing services, it may result in your inability to use the third-party services on our platform.

### **(III) Transfer**

We will not transfer your personal information to any company, organization or individual, except for:

1. Transfer with your consent: we will transfer your personal information to other parties after obtaining your consent.
2. In the event of a merger, division, dissolution or being declared to be bankrupt and liquidated, or any other circumstances involving a merger, division, dissolution or being declared to be bankrupt and liquidated, if the transfer of personal information is involved therein, we will require the new company or organization holding your personal information to continue to be bound by this Privacy Policy, otherwise, we will require such company, organization and individual to seek your authorization and consent again.

### **(IV) Public Disclosure**

We will publicly disclose your personal information only if such disclosure:

1. Has obtained your separate consent;
2. Is made in accordance with the laws: we may publicly disclose your personal information according to mandatory requirements of the laws, legal proceedings, litigations or competent government authorities.

### **(V) Exceptions to prior consent required for sharing, transfer and public disclosure of personal information**

According to the laws and regulations, we may share, transfer, or publicly disclose your personal information without prior authorization or consent if such sharing, transfer or public disclosure is:

1. Related to the performance of our obligations under the laws and regulations;
2. Directly related to national security or national defense security;
3. Directly related to public safety, public health, or significant public interests;
4. Directly related to criminal investigations, prosecutions, trials, or enforcement of judgments;

5. Conducted with a view to protecting your or another individual's significant legal rights and interests (such as life or property) but it is difficult to obtain your or his/her consent;
6. Related to personal information which was voluntarily disclosed by you to the general public;
7. Made with respect to personal information collected from legally and publicly disclosed information, such as from legal news reports, government information disclosure, and other channels;
8. Conducted under such other circumstances as provided for in the laws and regulations.

### **III. How we use Cookies and similar technologies**

To ensure the proper functioning of this platform, we will store small data files called Cookies on your computer or mobile device. Cookies typically contain identifiers, site names and certain numbers and characters. The primary function of Cookies is to facilitate your use of the services on our platform and assist the website in counting the number of independent visitors.

We will not use Cookies for any purpose other than those stated in this Policy. You may manage or delete Cookies according to your preferences. You may erase all Cookies stored on your computer, and most web browsers offer the option to block Cookies. However, if you choose to do so, you will need to manually change your user settings each time you visit our website. However, such modifications may prevent you from logging in or using certain services or features we provide that rely on cookies.

### **IV. How we store your personal information**

We will store in China the personal information collected and generated within China. We undertake that, unless otherwise required by the laws and regulations, your personal information will be stored for the shortest period necessary to achieve the purposes for which you have authorized its use.

### **V. How we protect your personal information**

We place great importance on the security of personal information and take all reasonable and feasible measures to protect your personal information:

1. We have adopted industry-standard data protection technologies and

management measures to prevent unauthorized access to, disclosure, alteration, loss, or destruction of personal information.

**2. Please be aware that, although we will make our best effort to ensure or guarantee the security of any information you send to us, the Internet environment is not 100% secure, and we shall not be liable for any risks or losses arising therefrom or related thereto.**

**3. In the unfortunate event of a personal information security incident, we will promptly notify you of the following details as required by the laws and regulations: the basic information and potential impact of the security incident; the measures we have taken or will take to deal with such incident; recommendations for you to independently prevent and mitigate risks; and the remedies available to you. We will promptly inform you of the relevant details in connection with such incident through website announcements, email, SMS, telephone, or otherwise. If it is difficult to notify each personal information subject individually, we will publish an announcement in a reasonable and effective way. Meanwhile, we will also take the initiative to report the status of handling the personal information security incident to regulatory authorities as required.**

## **VI. How you can manage your personal information**

### **1. Access to, copy, and correction of your personal information**

If you wish to access, copy, or correct your personal information, you may contact us through the methods specified in this Privacy Policy, and we will respond to your request promptly.

### **2. Deletion of your personal information**

You may make a request to delete your personal information through the methods specified in this Privacy Policy if:

**(1) We collect or use personal information in violation of the laws, administrative regulations, or our agreement with you;**

**(2) We share or transfer your personal information with third parties in violation of the laws, administrative regulations, or our agreement with you, we will immediately cease such sharing or transfer and notify third parties of deleting the information promptly;**

**(3) We publicly disclose your personal information in violation of the laws, administrative regulations, or our agreement with you, we will immediately cease such public disclosure and issue a notice requiring relevant recipients to delete the corresponding information;**

**(4) You no longer use our products or services, or you have canceled your**

**account, or we have terminated our services and operations.**

You hereby agree that once we respond to your deletion request, your personal information will be deleted, and all information previously provided by you and your operation records will be irretrievable. We may not immediately delete the corresponding information from the backup system, but we will do so when the backup system is updated.

### **3. Responding to your requests**

If you are unable to exercise your rights in the ways described above, you may contact us using the contact details contained in this Privacy Policy. To ensure security, you may be required to submit a written request or prove your identity in other ways. We may require you to verify your identity before processing your request.

**For your reasonable requests, we will not charge any fees in principle, provided that, for repeated requests that exceed reasonable limits, we will charge a cost-based fee based on the circumstances. We may refuse to respond to the requests that are repeatedly made without cause, require disproportionate technical means, bring risks to the legitimate rights and interests of others, or are otherwise impractical.**

### **4. Exceptions to the requirement to respond**

We will be unable to respond to your request under the following circumstances:

- (1) It is related to the performance of our obligations under the laws and regulations;**
- (2) It is directly related to national security or national defense security;**
- (3) It is directly related to public safety, public health, or significant public interests;**
- (4) It is directly related to criminal investigations, prosecutions, trials, or enforcement of judgments;**
- (5) We have sufficient evidence to demonstrate that the personal information subject has malicious intent or abuses his/her rights;**
- (6) It is made with a view to protecting significant legal rights and interests (such as life or property) of the personal information subject or any other individual but it is difficult to obtain your or his/her consent;**
- (7) Any response to the personal information subject's request will cause material damages to the legitimate rights and interests of the personal information subject or any other individual or organization;**
- (8) It involves trade secrets**

## **VII. Collection and use of minors' information**

We consider natural persons under the age of 18 to be minors. Our products and services are primarily intended for adults. If we discover that we have collected personal information from a minor without the prior verifiable parental consent, we will take steps to delete the relevant data as soon as possible.

## VIII. How this Policy is updated

We may update or modify this Policy from time to time. However, **we will not reduce the rights that are available to you under this Policy without your explicit consent.** Such changes shall constitute part of this Policy.

For material changes, we will also provide more prominent notices, such as prominent prompts, pop-up alerts. In such cases, your continued use of our services shall constitute your agreement to be bound by the revised Policy.

Material changes to this Privacy Policy shall include, without limitation:

- 1. Material changes to our service model, such as the purpose of processing personal information, the types of personal information processed, or the methods of using personal information;**
- 2. Material changes in our control, such as changes in ownership as a result of mergers, reorganizations, etc.;**
- 3. Changes in the main persons to whom personal information is shared, transferred or publicly disclosed;**
- 4. Material changes in your rights to participate in the processing of personal information and the methods of exercising such rights;**
- 5. Changes in our department responsible for the security of processing personal information, its contact details, or complaint channels;**
- 6. Existence of high risks as indicated by personal information security impact assessment reports.**

## IX. How to contact us

If you have any questions regarding this Policy or the protection of personal information, please contact us by sending your written inquiries, comments or suggestions to the following address:

Tel: 020-2902 6390

Email: [admin@sparkfly.net](mailto:admin@sparkfly.net)