

Privacy Policy

Effective Date: 2021-06-28

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This “Privacy Policy” explains the privacy practices of Altenergy Power System Inc. with subsidiaries and affiliates (collectively, “APsystems”, “controller”, “we”, “us”, or “our”) for our users (collectively, “you”, or “your”) using our products (collectively, “service”), including:

- Energy Monitoring & Analysis System (collectively, “EMA”)
- Mobile applications (collectively, “APP”, including EMA APP, EMA Manager, ECU APP)
- Application programming interface (collectively, “API”)
- Any other website or APP that we control and links to this “Privacy Policy”

We use this Policy to describe your rights and choices when you have purchased our products, or have registered an online EMA account to get the services. You can use the online EMA account to login EMA, EMA APP or EMA Manager.

Please carefully read through this Policy and understand our purposes and practices. When you start to use our products or services, and do not expressly object to this Policy, we will consider you have fully understood and agreed with this Policy, and also you have choice to choose not agree with this Policy, then please do not use our products and services.

If you have any question regarding this Policy, please do not hesitate to contact us via:

Privacy Policy: privacy@apsystems.com

[Yamin]:

We want to create an official email for APsystems to deal with the policies. And we suggest that USA or EU team can support it, local people more proper. Do you agree with us?

What Personal Information We Collect

1. Information You Provide to Us

- **Account and Profile Data**

When you registered an online EMA end user account, we may collect your first and last username, your contact details (such as your email address, phone number, physical address, installer information), and login credentials. And also we will collect

the product installations of your solar system (such as the device ID, device type).

When you registered an online EMA installer account, we may collect your first and last username, the contact details of you and your company (such as the email address, phone number, physical address), and login credentials.

- **Feedback**

When you email us for the feedback and suggestions, we may collect your feedback content and email address.

2. Information We Collect through Our Products

- **Product Data**

When your solar system connects to the Internet, we may collect the production energy data, solar systems' configuration data, maintenance data (such as the log files) and other data.

- **Alarm Data**

When your solar system connects to the Internet, we may collect the alarm data of your solar system.

- **Usage Data**

When you use our services, we may collect the usage data, according to your visits, clicks, download, messages sent/received and other data.

3. Information We Collect through Smart Devices

- **Basic Information of Smart Devices**

When you use our services, we may collect the basic information of your smart devices, such as the IP Address, operating system type and version, computer or mobile network information, and others.

- **Cookies**

When you use EMA, we may collect the log information about you, your computer or mobile device, such as the browser type, IP address and others.

Read more about our "**Cookie Policy**".

How We Process Your Personal Information

1. Provide You High Quality Service

We process your account and profile data, product data, usage data and smart devices related data to provide you our products and services you have requested.

2. Improve Our Service

We process the feedback from you, usage data and smart devices related data to develop and improve our products and services, to prevent and trace fraudulent or inappropriate usage, and to market and promote business.

3. Non-marketing or Marketing Communication

We process your account and profile data to send you important information regarding our services, changes to our terms, policies or other administrative information. We also send you marketing and promotional materials to you on our products and services. Additionally, you have choice to opt-out of receiving future communications.

4. Comply with Law

We may process your personal data as we believe necessary or appropriate:

- 1) to comply with applicable laws and regulations.
- 2) to comply with legal process
- 3) to respond to requests from governments authorities
- 4) to enforce our terms and conditions
- 5) to protect our operations, business and systems
- 6) to protect our rights, privacy, safety or property, including you
- 7) to allow us to pursue available remedies or limit the damages that we may sustain

5. Create Anonymous, Aggregated, Desensitized Data

We may create anonymous, aggregated or desensitized data from your personal information. The identities of these data have been removed and a specific person cannot be identified. We may use these data to evaluate and improve our services and tailor our products and commercial purposes, or share these data with third parties for our lawful business purposes.

How We Share Your Personal Information

1. With Your Consent

We may share your personal information with your consent or otherwise instructed by you.

2. Subsidiaries and Affiliates

We may share your personal information with our subsidiaries and affiliates when consistent with this "Private Policy".

3. Installers or Partners

We may share your personal information with your installer or partner for monitoring and servicing your APsystems product, or other purposes.

4. Installers or Partners Using our API

We may share your account and profile information (such as the username and device UID information), product data of your solar system to your installer or partner who apply for the API developer via API.

5. Government Authorities

To comply with law, or legal process or contractual necessity, respond to any claims, we may disclose your personal information in connection with protection of our rights, fraud prevention and safety of us, our customers or the public.

Your Rights and Choices

1. Access or Update Your Personal Information

You can review, update and correct your personal information by logging into your APsystems EMA account through EMA website or EMA APP or EMA Manager.

2. Opt out of Marketing Communications

If you have registered an EMA account, you are considered to agree to receive the marketing communications from us by emails. You can opt out of getting these marketing related emails by contacting us at privacy@apsystems.com.

3. Opt out or Object to Use Your Personal Information

We ask you to not provide us with any sensitive personal information, if you provide us, you must be consistent with our processing and using this information with this "Privacy Policy". And you can ask us to delete or not use your personal information by contacting us at privacy@apsystems.com, we will not be able to provide our product and services.

4. Share Your Information to Others

You can share your solar system by turning on "Allow visitors to access to this system" to send others an access link without password checking, or share your EMA login credentials to others. APsystems is not responsible for the actions of your sharing and

people you shared. They may share your information to anyone without your authorization. We do not encourage you to share the information without any privacy policy.

How We Protect Your Personal Information

We respect your rights and control over your personal information, and the security of your personal information is important to us as well, we have used commercially reasonable physical, administrative, and technical safeguards to preserve the integrity and security of your personal information, and we have provided various security strategies to effectively ensure data security of user and device. However, security risk is inherent in all internet and information technologies, we cannot guarantee the total security of your personal information.

Retention

We retain personal information for as long as necessary to fulfill the purposes for which we collected, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements. For example, we will evaluate the limit and safety of the database regularly, and may delete or simplify storage the production data, alarm data and usage data according to the evaluations. When we do these operations, we will determine your services will not be affected at first.

When we no longer require the personal information we have collected about you, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. If we anonymize your personal information (so that it can no longer be associated with you), we may use this information indefinitely without further notice to you.

International Data Transfers

We store your personal information in the Amazon Web Services (AWS) in Europe and we comply with the General Data Protection Regulation (GDPR). If you want us to transfer your data out of Europe or a country not deemed by the European

Commission, you may be required to provide data protection laws and regulations in this country or region to ensure that this cross-border transfer complies with the relevant laws and regulations, and if you cannot provide the relevant information and insist that we conduct this cross-border transfer, we have the right to refuse and stop your services.

[Yamin]:

We are not sure how to write this part, for our company is a worldwide company and our customers are in different countries, different countries have different policy to explain. As EMA now, we put all the data in AWS in Europe. In the future, we will try out best to build some necessary data centers to protect our customers' personal data, but currently, we can not support. So when we write this part, to the Europe users, it is acceptable, but to the users in America, it is not, and to China, not as well. Then how to write this part. Could you have any suggestions on it? Or we make different policies (EU version, USA version, China version?) to different countries. If so, can you make some words to explain the different versions?

Personal Data Breaches and Related Procedures

A data breach may lead an accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed. We respect your rights to protect your personal data, if a data breach occurs, we will notify you the data breach and emergency measures we have taken via email. If need, we may stop your services in time. And we shall make corresponding explanations if we did not notify you in 72 hours.

Children's Privacy

To protect the privacy of your children is especially important to us, we do not knowingly collect any personal information from anyone under the age of 16. If a parent or legal guardian becomes aware that his or her child has provided us with information without their consent, he or she can and should contact us at privacy@apsystems.com, we will delete such information. And if we become aware that we have collected information from anyone under the age of 16 without permission from his parent or legal guardian, we will delete such information as well.

Changes to This Privacy Policy

We reserve the right to modify this "Privacy Policy" at any time, and you have choices to know the changes. We will notify you by email (send to the email address specified in your EMA account) or by means of a notice in the EMA website or APPs prior to the change becoming effective. We encourage you to periodically review the latest information on our "Privacy Policy", and only if you accepted the new one, you can continue to use our product and services. If you object the new one, we will contact

you and determine that your opt-out of it, we will delete your account and cannot provide you our product and services.

Contact Us

If you have any questions or comments about this “Privacy Policy”, please contact directly at privacy@apsystems.com.