

PERSONAL DATA PRIVACY POLICY AND STATEMENT

(A) POLICY STATEMENT

Cornerstone Technologies Holdings Limited (“**Cornerstone Technologies**”) and our subsidiaries and affiliates (our “**Group**”) is concerned to ensure that all personal data submitted through our website, including the BaSE EV apps (the “**Apps**”) developed by Cornerstone EV Charging Service Limited or other technological devices or by email, telephone calls or paper subscriptions are handled in accordance with the relevant provisions of the Personal Data (Privacy) Ordinance (the “**Ordinance**”), Cap. 486, laws of Hong Kong Special Administrative Region (“**Hong Kong SAR**”).

We respect personal data privacy and are committed to fully implementing and complying with the data protection principles and all relevant provisions under the Ordinance.

(B) STATEMENT OF PRACTICE ON PERSONAL DATA HELD BY US

(I) Kinds of Personal Data Held and Main Purposes of keeping Personal Data

We may collect data from you via this website, through the Apps, SMS, other technological devices or by emails, telephone calls or paper subscriptions under our Private Subscription Plan or otherwise. Such data may include but not limited to, your name, gender, date of birth, identity document information, telephone number, fax number, address and/or its proof, email address, credit card information and bank account number. The provision of personal data is generally voluntary unless otherwise specified. A failure to provide the requested personal data, or the provision of inaccurate or incomplete information may result in us not being able to process your request, application, enquiry, complaint or other matters. If you are under the age of 18, consent from your parent or guardian is required before you provide us with any personal data.

The main purposes for which any personal data collected by us may comprise all or any one or more of the following purposes:

- (a) for processing applications from you for provision of services, products and/or other facilities;
- (b) for operating, maintaining and providing services, products and/or other facilities;
- (c) for processing of your complaints, enquiries or feedback;
- (d) for enforcement of your obligations, including without limitation the collection of amounts outstanding from you; and
- (e) for all related purposes.

The personal data will not be used for any other purposes, disclosed or transferred without your consent, unless such use, disclosure or transfer is permitted or required by law.

Calls between you and our customer service personnel may be recorded for the purposes of staff training, improvement of service quality and clarification of contractual issues.

(II) Notice for Direct Marketing

We intend to use your personal data including your name, address, telephone numbers, email and other contact information collected for marketing communications such as direct mail, email, telephone calls, SMS, promotions, offers and other events to be offered by us or by our business partners or future marketing purposes and/or joint promotions with our subsidiaries, affiliates or in conjunction with products/services offered by us, our affiliates or business partners in connection with the EV charging system and related services.

We may not use your personal information for direct marketing without your consent. If you do not allow

and agree us to use the data for direct marketing, you may also opt-out from receiving any of such direct marketing information or materials at any time, free of charge by sending us a request at the mail address or email as provided in **Paragraph (VIII)** or by calling our hotline at [*] during office hours ([*] to [*]), Mondays to Fridays).

(III) Information collected when you visit our website

We record the visits to our website using cookies and page tagging without collecting any personal identifiable information of users. Cookies are small computer files that can be stored in web users' computers for the purposes of obtaining configuration information and analysing web users' viewing habits. We use cookies to collect statistics about the number of visits of users to our website and the users' preference of websites and online services offered by us. You may choose to accept or reject cookies. If you reject the cookies, you will not be able to use some of our functions.

(IV) Log Data

Whenever you use our services, in a case of an error in the Apps, we shall collect data and information (through third party products) on your phone called log data (the "**Log Data**"). The Log Data may include information such as your device Internet Protocol address, device name, operating system version, the configuration of the Apps when utilizing our services, the time and date of your use of the service and other statistics.

(V) Transfer and Retention

We strive to keep our processing activities with respect to your personal data as limited as possible. Personal data held by us will be kept confidential but we may provide or transfer the personal data to:

- (a) any members of our Group; or
- (b) external parties including but not limited to any agent, contractor or third-party service provider which provides administrative, telecommunications, IT or other services to us solely for the purposes in connection with the operation of our business. All our service providers are bound by contractual duties to keep confidential any data they come into contact with against unauthorised access, use and retention; or
- (c) any authorities to whom we are under an obligation to make disclosure under any legal or regulatory requirements binding on us; or
- (d) our successor and assigns, or
- (e) any other organizations, for the purposes set out in **Paragraph (I)** above or any other directly related purpose.

We may also transfer your personal data to the above parties outside Hong Kong SAR for any of the above purposes.

Personal data provided by you are retained for as long as the purposes for which such data were collected continue.

(VI) Protection measures

We take appropriate steps to protect the personal data we hold against loss, unauthorised access, use, modification or disclosure.

(VII) External links

If any part of our website or the Apps contains links to other websites, those sites will not be operated under this privacy statement. You are advised to check the privacy statements on those websites to understand their policies in relation to the collection, use, transfer and disclosure of personal data.

(VIII) Accessing your personal data

You have the right to access and update your personal data by writing to us at the following address or by sending us email at info@cstl.com.hk.

Data Protection Officer
Cornerstone Technologies Holdings Limited
Room K, 26/F, Maxgrand Plaza,
3 Tai Yau St.,
San Po Kong, Kowloon,
Hong Kong

Under applicable laws and regulations, we have the right to charge costs which are directly related to and necessary for the processing of any personal data request.

(IX) Amendments to this Privacy Statement

We may amend this policy and statement from time to time. If we make any material changes to our policy and statement, we will alert you by posting a prominent notice on our website. Any such change, update or modification will be effective immediately upon posting.