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## **Tongcheng Travel Holdings Limited**

### **User Privacy Policy**

The User Privacy Policy will ease you into our collection, use, storage, and management of your personal information. We have expanded and refined our user privacy policy for our products and services based on this Policy, with a purpose to securing your personal information and taking it under control. This Policy applies to our entire operations and suppliers.

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

When you use our products or services, we need/may need to collect and use some of your personal information, following the principles that are reasonable, relevant and necessary to minimize the collection of your information. We collect and use two types of your personal information:

(I) Information necessary for the basic business functions of our products and services: this type of information is necessary for the normal operation of the products and services which you must authorize us to collect. If you refuse to provide such information, we will not be able to provide you with the relevant products or services.

(II) Information that may be collected for extended business functions of our products and services: such information is required for non-basic business functions which you may choose whether to authorize us to collect. If you refuse to provide such information, the extended business functions may not be available or may not achieve the results we intended, but will not affect your normal use of the basic business functions.

(III) We will only collect and use your personal information for the following purposes:

1. Circumstances in which you authorize us to collect and use your personal information When you use our products and services, we may need to collect and utilize certain personal information essential for proper functioning. To proceed, users must authorize us to collect this information. If you refuse to provide the required information, you may be unable to use our products and services. This may include functions such as becoming a member, placing orders, making payments, completing identity verification, accessing customer service and after-sales support, publishing information, or recommending customized products and services.

2. Circumstances in which you may choose to authorize us to collect and use your personal information

(1) In order to provide you with the basic business functions of displaying and searching for local dining, entertainment, and travel-related information, we will collect relevant information generated during your use of our services with your authorization, including location

information, access to shared storage for reading/writing purposes, and access to device status and WIFI functionality to reduce the failure rate in the use of the train ticketing service.

(2) In order to provide you with personalized and convenient services, you may choose to use our extended functions, including functionalities based on the camera, microphone, contact list, calendar, clipboard and floating window. We will collect and use the information only in compliance with the laws and in accordance with your specific authorization. This information will be collected in the specific functionalities and business scenarios you choose, and if you do not provide such information, it will not affect your use of the basic functions.

(IV) We may collect and use your personal information without your authorization under the following circumstances:

You fully understand and agree that we may collect and use personal information without your authorization under the following circumstances:

1. necessary for the fulfilment of legal duties or obligations;
2. necessary to respond to public health emergencies, or to protect the life, health and property safety of natural persons in urgent situations;
3. reporting news and monitoring public opinion for public interests, handling personal information within a reasonable scope;
4. within a reasonable scope and in accordance with applicable laws, processing personal information that has been voluntarily disclosed by individuals or other personal information that has been lawfully disclosed;
5. other circumstances stipulated by laws and administrative regulations.

(V) Circumstances in which we obtain your personal information from third parties

We may obtain your authorized shared account information (e.g., avatar, nickname, phone number, email address) from third-party platforms. With your consent to this Privacy Policy, we will bind your third-party account to your Tongcheng Travel account, enabling you to log in directly via your third-party account and use our products and services. Under agreements with third parties, after confirming the legality of the data sources, we will use such personal information in compliance with relevant laws and regulations.

(VI) Others

When you need to share or copy information about hotels, scenic spots or activities that you are interested in, or accessing Tongcheng Travel App from external advertisements, we may conduct rule-based checks on the text content on your clipboard. We will only read and upload the text to our server when and only when we identify the text (which contains both a specific

URL and text) information that meets the specific rules. These strings do not identify you, and we do not read and store any other information on your clipboard.

## **II. How we use cookies and technologies of similar nature**

(I) In order to make your visit easier and more convenient, we may store small data files called cookies on your device or system to when you visit or use the services we provide. These cookies help identify you, save you from repeatedly entering registration details, optimize your choices of and interactions with advertisements, as well as determining the security status of your account. You can clear all cookies stored on your computer or mobile device. You have the right to accept or refuse cookies. If your browser automatically accepts cookies, you can modify your browser settings to refuse cookies based on your preferences. Please note that if you choose to refuse cookies, you may not be able to better experience the services we offer.

(II) In addition to cookies, we may use such other similar technologies as web beacons and pixel tags on our website. For example, emails we send to you may contain links that lead to our website, and if clicked, we will track that click to gain a better understanding of product and service preferences so as to improve our customer service experience. A web beacon is typically a transparent image embedded in a website or email. With pixel tags in emails, we can tell if an email has been opened. Users can unsubscribe from our mailing list at any time if they do not want their activity to be tracked in this way.

## **III. How we share, transfer, and disclose users' personal information**

### **(I) Information sharing**

We may share your information regarding order, account, device and precise location with our third-party partners to ensure the services provided to you are completed successfully.

However, we will only share your personal information for lawful, legitimate, necessary, specific, and explicit purposes, and only as much as is necessary to provide the services.

1. For companies and organizations with whom we share personal information, we will sign strict confidentiality agreements, requiring them to handle personal information in accordance with this Privacy Policy and other relevant confidentiality and security measures. Our partners are not authorized to use the shared personal information for any other purposes other than those agreed upon. If there is a need to alter the purpose of data processing, we will seek your explicit consent again before proceeding.

2. We will not provide your personal information to above third parties without your explicit consent. You can check the list of your authorized applications, manage and cancel your authorized information through "Me - Settings - Privacy Settings - Authorization Management".

## (II) Information transferring

We will not transfer your personal information to any companies, organizations and individuals except under the following circumstances:

1. with your prior explicit consent or authorization;
2. in accordance with applicable laws and regulations, requirements of legal procedures, or mandatory administrative or judicial requirements;
3. in the events of merger, demerger, dissolution, bankruptcy or similar transactions involving the transfer of personal information, we will notify you of the recipient's identity and contact details. We will require the new company or organization holding your personal information to continue adhering to this privacy policy, otherwise we will require the company or organization to re-obtain your explicit authorization.

## (III) Information transmitting

If you need to transmit your personal information to a designated personal information processor, you can contact us. After verifying your identity and confirming that the request complies with the requirements specified by the Cyberspace Administration of China, we will provide you with the means of information transmit, unless otherwise prohibited by applicable laws and regulations, or specific provisions of this Policy.

We will implement necessary information management measures and technical means to ensure the security of the transmission, and prevent risks such as disclosure, damage, loss, or tampering of your personal information.

## (IV) Public disclosure

We will publicly disclose your personal information only in the following circumstances:

1. We will disclose your specified personal information according to your needs and in a manner that you have individually agreed to disclose;
2. If we are required to provide your personal information according to laws, regulations, mandatory administrative enforcement or judicial requirements, we may publicly disclose your personal information based on the type of information and method of disclosure specified in such requests. Subject to laws and regulations, when we receive a request for disclosure of information as described above, we will require the relevant legal documents, such as subpoenas or letters of inquiry, to be provided.

## (V) Exceptions to prior authorization for sharing, transferring, or disclosing personal information

1. necessary for the fulfilment of legal duties or obligations;

2. necessary to respond to public health emergencies, or to protect the life, health and property safety of natural persons in urgent situations;
3. reporting news and monitoring public opinion for public interests, handling personal information within a reasonable scope;
4. within a reasonable scope and in accordance with applicable laws, processing personal information that has been voluntarily disclosed by individuals or other personal information that has been lawfully disclosed;
5. other circumstances stipulated by laws and administrative regulations.

(VI) If we share, transfer or disclose personal information in violation of the law and the judicial authorities determine that we should be held liable, we will comply with the effective legal documents to safeguard your lawful rights and interests from infringement.

#### **IV. How we store the user information collected**

(I) We will retain your personal information for up to six months after the date of your account cancellation, unless an extended retention period is required or permitted by law or the authorities, or necessary to assist the authorities in their inquiries. We will retain your information only for the shortest period necessary for the purposes described in this Policy or as required by laws or regulations. Upon expiration of the retention period, or upon your exercise of the right to request deletion or account deactivation, we will either delete or anonymize your personal information.

(II) If we cease to operate the products or services of Tongcheng Travel, we will promptly stop the activities of collecting your personal information, notify you of the cessation of operations in the form of individual delivery or announcement, and delete or anonymize the personal information held by us.

(III) Personal information collected and generated in our operation in the People's Republic of China is stored within China, except in the following cases: explicitly provided for by laws or regulations; with your separate consent; your personal initiative such as cross-border transactions via the Internet.

#### **(IV) Cross-border transfer**

If the storage location of your personal information is transferred from within China to outside China, we will strictly comply with applicable laws.

Scenarios requiring the transfer of your personal information overseas include:

- (1) Explicit authorization obtained from you;
- (2) Marketing activities involving overseas service providers;

(3) Your cross-border transactions via the Tongcheng Travel platform and your proactive cross-border actions;

(4) Explicit requirements under laws and regulations.

(V) If you visit our website from outside mainland China, please be aware that your information may be transferred to, stored in and processed in mainland China. The data protection laws and other laws in mainland China may differ from the laws in your country. However, rest assured that we will take steps to protect your information. By choosing to use our services, you acknowledge and agree that your information may be transferred to our website and to third parties with whom we share information as described in this Privacy Policy.

(VI) In terms of management, we have established a data security management organization and security management standards, with all data security personnel possessing professional expertise. We adopt industry-standard security measures to ensure the safe storage of your information. **V. How we ensure the security of user information collected**

(I) We attach great importance to information security and have set up a special data security team, whose contact email is [anquan@ly.com](mailto:anquan@ly.com). We strive to provide you with information protection. We have incorporated the Privacy Policy into our group-wide risk/compliance management, and have adopted appropriate management, technical and physical security measures. We have established an information security and assurance system that is compatible with our business development with reference to domestic and international information security standards and best practices.

(II) We have established security protection measures throughout the data lifecycle, covering collection, storage, display, processing, use, destruction, etc. We take control measures according to the level of information sensitivity, including but not limited to identity identification, SSL encrypted transmission, access control, malicious code prevention, security audit, encrypted storage by encryption algorithms with a strength of AES256 or above, desensitized display of sensitive information, etc. We also conduct quarterly information security audits to minimize the security risks of online business to the greatest extent.

(III) We will use encryption and anonymization technologies for data security in the transmission of and storage of personal information, and isolation technology for data isolation.

(IV) We will strengthen the security capability of the software you install on your device and will constantly enhance our capabilities to identify and prevent viruses, Trojan horses and other malicious codes. We will strive to guarantee the security of the software on your device and to protect locally cached data and files by encryption through continuous improvement of our technical means.

(V) We have established a dedicated security organization, policies, and procedures to ensure the effective implementation of internal security measures. Strict controls are applied to employees who may have access to your information, including monitoring their operational activities. For critical operations such as data access, internal/external data transfer, desensitization, and decryption, we have implemented approval mechanisms and require all such employees to sign legally binding confidentiality agreements. Concurrently, we conduct regular information security training for employees, mandating adherence to secure operational practices in daily work, compliance with confidentiality agreements, and participation in security audits.

(VI) Your account is protected by security safeguards. Please keep your account information properly and refrain from sharing them with others. If you find that your personal information has been leaked, especially your account credentials have been leaked, please contact our customer service immediately so that we can take appropriate measures.

(VII) Despite the aforementioned security measures, please understand that there are no "perfect security measures" on the internet. We will provide security measures according to the existing technology to protect your information and provide reasonable security. We will make every effort to ensure that your information is not be leaked, damaged or lost.

(VIII) Please save or back up your text and picture information in a timely manner. You need to understand and accept that the systems and communication networks used by you to access our services may encounter issues due to factors beyond our control.

(IX) We have passed the evaluation and completed the filing for the National Classified Cybersecurity Protection (Level 3).

(X) Risks such as leakage, destruction, and loss of personal information, whether inside or outside the country, are classified as enterprise-level critical security incidents. To prevent such security incidents, we will be responsible for organizing regular security drill simulations with taskforce members. In the unfortunate event of such an incident, we will activate the emergency response plan with the highest priority, establish an emergency response team, trace the cause and reduce losses in the shortest possible time, so as to prevent the security incident from escalating.

(XI) We maintain a strict "zero-tolerance" policy for any breaches of our User Privacy Policy, with immediate and stringent disciplinary measures upon discovery.

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

We provide convenient ways for you to access, correct and delete your account information and other personal information you provide when using our services, as required by applicable laws and regulations. You can login to "My" - "Common Information" "All Orders" "My Wallet" to

check, correct and delete your personal information. We will process the request within 15 working days.

(I) You may request deletion of your membership information under the following circumstances:

1. if our processing of personal information violates laws or regulations;
2. if we collect or use your personal information without your explicit consent, or if you withdraw your consent;
3. if our processing of personal information materially breaches our agreement with you;
4. if you cease using our products/services, or if you voluntarily cancel your account;
5. if we permanently discontinue providing products/services to you;
6. if the purpose of the processing has been achieved, or cannot be achieved, or is no longer necessary to achieve;
7. other circumstances stipulated by laws and administrative regulations.

If we decide to comply with your deletion request, we will simultaneously notify, to the greatest extent possible, all entities that have obtained your personal information from us and instruct them to promptly delete such data, unless otherwise required by laws/regulations, or if these entities have obtained your independent authorization.

After you or our assistance complete the deletion of relevant information, certain legal requirements or technical limitations may prevent us from immediately removing the corresponding data from backup systems. In such case, we will securely store your personal information and isolate it from any further processing until the backups are updated, at which point such data will be erased or anonymized.

(II) Methods and scope for modifying or withdrawing your consent

You can withdraw your authorization for us to continue to collect your personal information by cancelling your account, calling 95711, accessing the following options in the app: "My" - "Settings" - "Privacy Settings" - "System Permission Management" or "My" - "Settings" - "Privacy Settings" - "Privacy Agreement". You may also contact Tongcheng customer service (domestic hotline: 95711) to modify or withdraw the scope of your authorization for us to collect and process your personal information. Please note that certain business function requires some basic personal information to be completed. If you modify or withdraw all or part of the authorization for a specific purpose, you may be unable to use certain business functions or experience them optimally. For our ongoing data processing activities involving your personal information, we will cease processing the corresponding personal information



after you withdraw your consent. However, your decision to withdraw consent will not affect the previous processing of personal information conducted based on your original authorization.

### (III) Obtaining copies of personal information

You may obtain copies of your basic personal information and identity information by calling the customer service hotline at 95711, and our customer service team will verify your identity before providing them. Please understand that our current technology cannot directly transmit your personal information copies to third parties. If you require this, we will seek alternative solutions for you within the scope permitted by laws and regulations.

### (IV) Account cancellation

You can cancel your Tongcheng Travel account via the following two methods:

1) You can cancel your account in the Tongcheng Travel app by navigating to "My" - "Edit Profile" - "Account & Security" - "Cancel Tongcheng Account". We will process your cancellation request within 15 working days after receiving it.

2) You can also call the domestic customer service hotline at 95711, and complete the account cancellation with the assistance of manual customer service after verification.

After cancelling your Tongcheng account, all information within the account will be cleared. We will stop providing products or services, and will delete your personal information or anonymize it as required by applicable laws. We will no longer collect, use, or share personal information related to the account. However, prior information may need to be retained for the period mandated by regulatory requirements, and competent authorities still have the right to lawfully inquire about such information during this legally required retention period.

### (V) Constraining automatic decision-making by information systems

In certain business functions, we may make decisions solely based on non-human automated decision-making mechanisms, such as information systems and algorithms. If these decisions materially affect your legal rights and interests, you have the right to request an explanation from us, and we will provide appropriate remedies. You may also call the customer service hotline at 95711 to lodge complaints or provide feedback.

### (VI) Others

In accordance with applicable laws and regulations, we also guarantee your rights to exercise the following actions regarding your personal information: transferring your personal information, deciding on its use, restricting its processing, and refusing its processing. You can contact us by calling the customer service hotline at 95711 to exercise the aforementioned rights.

## **VII. Protection of minors**

(I) We attach great importance to the protection of the personal information of minors. If you are a minor (a citizen of the People's Republic of China under the age of 18), you should obtain prior consent from your legal guardian before using our services. We protect the personal information and privacy of minors in accordance with the provisions of relevant laws and regulations.

(II) We do not collect personal information directly from minors. For cases where we collect personal information from minors with the consent of their parents or guardians to use our products or services, we will only use, share, transfer or disclose such information as permitted by law or regulation, with the express consent of their parents or guardians, or as necessary to protect minors.

(III) We protect the personal information of minors in accordance with relevant national laws and regulations, and will only collect, use or publicly disclose the personal information of minors when permitted by law and with the explicit consent of the guardian. If we discover that the personal information of minors has been collected without the prior and verifiable consent of the guardian, we will take measures to delete the relevant data as soon as possible.

(IV) We adhere to the principles of justified necessity, informed consent, clear purpose, security assurance, and lawful utilization when handling personal information of children under the age of 14. We store, use, and disclose such information in compliance with the legal requirements outlined in the *Regulations on the Network Protection of Children's Personal Information of the People's Republic of China*. When you, as a guardian, choose to use Tongcheng Travel for the children under your guardianship, we may need to collect the children's personal information from you as necessary to provide you with the relevant services. If you do not provide the required information, you will be unable to access the relevant services we offer. Additionally, you may voluntarily provide us with children's personal information when using the review feature, so please be aware of this and make informed choices. As a guardian, you are responsible for properly fulfilling your guardianship duties to safeguard children's personal information. If you have any opinions, suggestions, or complaints regarding matters related to children's personal information, please contact us.

### **VIII. Revisions and updates to this privacy policy**

(I) We may adjust and update our privacy policy as appropriate in light of specific matters such as compliance requirements of laws and regulations as updated and business content as adjusted from time to time to ensure that we apply a privacy policy that maximizes the security of your personal information. Any change and update to this privacy policy will be posted on the official website of Tongcheng Travel.

(II) The full text and latest version of this Privacy Policy can be found in the User Privacy Policy published on the Tongcheng Travel Official Website ([同程旅行\\_同程旅行服务协议](#)).

## **IX. Contact us**

Your opinion values to us.

(I) If you have any other complaints, suggestions, issues related to personal information of minors, or any questions, comments or suggestions on the content of this Policy, please feel free to contact us. You can contact us by visiting our online customer service system, or by sending an email to our personal information protection officer(anquan@ly.com), or by calling our customer service at hotline: 95711 and many other ways.

(II) We will promptly review the issues involved. In general, we will respond within fifteen days after verifying your identity. If you are dissatisfied with our responses, especially if our handling of personal information has infringed on your legitimate rights and interests, you may seek resolution through the following external means:

- 1) File a civil lawsuit with the People's Court;
- 2) Report the matter to the Cyberspace Administration of China (CAC) (website: <http://www.12377.cn>; hotline: 12377).

## **X. Scope of Application and Governing Law of the Privacy Policy**

(1) Except for certain specific services, all our services are governed by the Tongcheng Travel User Privacy Policy. Specific services may be subject to their own dedicated privacy policies, which constitute an integral part of the Tongcheng Travel User Privacy Policy. If any inconsistencies exist between the privacy policy of a specific service and the Tongcheng Travel User Privacy Policy, the privacy policy of the specific service shall take precedence.

(2) The Privacy Policy should be interpreted in alignment with the national laws of the applicable country, including the disputed provisions of the law. If any provision conflicts with the law, such provisions shall be re-interpreted in a manner as closely as possible to the original intent, while the remaining provisions shall remain legally valid and enforceable. Any disputes arising from the interpretation of this Privacy Policy or from users booking products or services through Tongcheng Travel shall fall under the jurisdiction of the Suzhou Industrial Park People's Court.