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## I. Introduction

Creme Concepts (HK) Limited and its affiliates (hereinafter referred to as "ICC" or "we") understand the importance of personal data to you. In order to protect your personal data and privacy, this *Privacy Policy* (hereinafter referred to as "this Policy") is hereby developed. Please read this Policy carefully. The terms hereof that are (possibly) significantly related to your rights and interests have been bolded by ICC for your attention and reference. Please ensure that you have carefully read and fully understood all the terms hereof before using ICC's products or services. By choosing to use or continue to use any products or services of ICC, and submitting your data (including your personal data) for our use for the purpose stated at the time of collection, you consent to our use and processing of your data in accordance with laws, regulations and this Policy.

This Policy applies to all products and services of ICC, including but not limited to ICC website ("Website"), iOS application, Android application, WeChat mini program ("APP") and other terminals and programs. Should you have any objections to or questions about the Terms of Use or this Policy, please contact us at the contact details given in "VIII. Contact Us" herein.

We may revise this Policy from time to time in accordance with laws and regulations or business adjustments. In the event of any change to this Policy, we will display the content changed to you in the form of prominent reminders, push notifications, messages, etc. Please understand that we will collect, use, process and store your personal data in accordance with the changed policy only if you confirm and agree to the changed policy. You have the right to refuse the changed policy, but please be aware that once you refuse the changed policy, you may not be able to use or continue to fully use the relevant services and functions of ICC, or the services and functions will not achieve the intended effect. In case of any discrepancy between the Chinese and English versions of this Policy, the English version shall prevail.

Before using the products or services of ICC, please confirm that you are capable of agreeing to and complying with this Policy and are solely responsible for all your actions hereunder. If you do not possess the aforementioned capacity appropriate to your behavior, you may use the products or services of ICC only with the knowledge or consent of your legal guardian(s). If you are a minor, please read this Policy, especially the terms concerning minors, and determine whether you agree to it together with your legal guardian(s). The exercise and performance of the rights and obligations hereunder by a minor shall be deemed to have been approved by the legal guardian(s).

## II. Definition

1. "Affiliate" refers to a company, an institution or other entities that, currently or in the future, control, are controlled by, or are under common control with, Creme Concepts (HK) Limited .
2. "Control" refers to the ability, directly or indirectly, by ownership, voting shares, contracts, actual operating associations or other legally recognized means, to influence the management or operation of a controlled object.

### III. Purposes and Uses for Which We May Collect Your Data and How Do We Use Your Data

ICC collects and uses personal data that you voluntarily provide during the use of our products/services or that are produced by the needs of our products and/or services in accordance with laws and regulations as well as the principles of legitimacy, legality and necessity. If we intend to use your personal data for other purposes not specified herein in order to provide you with our products or services, or use the collected data for a specific purpose, we will inform you in a timely and reasonable manner, and seek your consent again before use.

There are two types of personal data we collect and use. One type is the data necessary for the core business functions of our products and/or services. Such data is necessary for the proper operation of the products and/or services, and you must authorize us to collect it. If you refuse to provide such data, you will not be able to use our products and/or services normally. The other type is the data that may be collected for additional business functions. Such data is necessary for non-core business functions, and you may choose whether to authorize us to collect it. If you refuse to provide such data, the additional business functions cannot be enabled or achieve the intended effect, but your normal use of the core business functions will not be affected.

#### (I) Scenarios in which you should authorize us to collect and use your personal data

##### 1. Account registration

(1) To register an account and log in to ICC Website or APP, you need to complete the registration procedures under our guidance, during which you should provide us with the following: account name, password, date of birth, gender, age or age range, mobile phone number or email address (for accepting Captcha to match personal identity). Only by providing true and accurate information can you successfully register an account and use the core functions of our products and/or services. If you choose not to provide the above information necessary to realize the core functions of the products and/or services of ICC, we may be unable to provide you with such functions.

(2) Our products may support you to log in with a third-party platform account (Google, AppleID, etc.). If you choose to log in with a third-party platform account, we will acquire relevant data (including user name, nickname, and avatar) and authentication data (sensitive personal data) under such account according to your authorization. We promise that the above personal data is collected for the purpose of providing you with account registration and login services, protecting your account security and preventing security risks. If you refuse to authorize such data, you will not be able to log in to our platform with a third-party platform account, but it will not affect your normal use of other products and services we provide.

##### 2. Provision of location-based data display

If you place an order and choose self-pickup or takeaway service (if applicable) on ICC Website or APP, you need to provide us with your location data so that we can recommend and show you the menus (product lists) and the marketing materials of special offers of the stores near you. Precise location data can indicate that you know the distance from the stores to you. Once you enable the positioning function of the mobile device through system authorization, we will obtain your location data using such technologies as IP address, GPS, WLAN (such as Wi-Fi) access points, Bluetooth and base stations that can provide relevant data, as well as real-time

data containing your location provided by you or other users (we only collect your location at that time, and will not determine your whereabouts based on your location data at different time periods), such as your location data contained in the account data you provide. You can disable the positioning function in the system of your mobile device to stop our collection of your location data, but this may prevent you from using our location-based services or prevent the services from achieving the intended effect.

### 3. Search and browse

When you browse or use the search function of ICC Website or APP, we need to collect some data from you, including the following personal data: your device information, your log information (including the words or expressions you search), your browsing history and time, the time and number of you searches, and your location data (including the distance between the merchant and you). We collect such data in order to provide, improve and develop our products and services.

### 4. Customer services

When you file a complaint, appeal or consultation with ICC, in order to protect your account and system security, you should provide account information first, which will be used to match with your previous personal data to verify your user identity. Meanwhile, in order to contact you or help you solve problems, you should also provide such personal data as name, mobile phone number, email address and other contact details (sensitive personal data). In addition, we will collect the communication information between you and us (including text/images/audio/video/call logs), and other necessary information related to your needs. We collect such information in order to investigate facts and help you solve problems. If you refuse to provide such information, we may not be able to provide you with timely feedback on the results of the complaint, appeal or consultation.

### 5. Commodity transactions

When you purchase goods or services on ICC Website or APP (if applicable), you should provide certain information associated with the completion of transactions, including information about the goods or services traded and consignee details (consignee name, delivery address and contact number) (sensitive personal data). In addition, we will collect some other order-related information, including transaction amount, order time, order number, order status, payment method, payment serial number, and payment status. We collect such information in order to help you complete transactions successfully, ensure your transaction security, query order information, and provide customer service.

### 6. Payment

When you enable a membership service, order goods, top up, etc. on ICC Website or APP, you need to use the payment function. During the payment process, we will collect your financial account data, such as credit card number, account name, bank card number, deposit bank, user ID of a third-party payment channel and other payment data. The above data is necessary for us to provide you with the goods and/or services you purchase, and we are unable to acquire your personal property information based solely on such data.

## 7.Functions necessary to secure transactions

In order to ensure system stability and security when you use our products and/or services, prevent your personal data from being illegally acquired, more accurately prevent fraud, and protect account security, we need to collect your data to determine the risk of your account. Such data includes device information (including IP address, IDFA, device unique identifier (such as MEID/UDID/OPENUDID), MAC address, IMEI, OAID, SIM card data, WiFi data (such as BSSID/SSID/ICCID), network status, device model and status, GUID, network environment, software installation list, operating system type and software version), Internet access records, and log data. We will use such data to screen potential system risks, security risks, and data anomalies. If you do not provide such data, we are unable to protect your account security and account rights.

## 8.CCTV images and videos

We may install CCTV systems and, where appropriate, record video and/or audio. In addition, we may maintain records as permitted by applicable laws. We collect such data in order to ensure the safety of our stores.

## 9.Basic personal information (only applicable to ICC Workstation APP)

When you click on the link in the SMS sent by the Workstation, we need to collect some data from you, including your ID card number/passport number (for authentication), health status, contact details and other basic personal information (sensitive personal information). We collect such information in order to support personal management and protect personal income rights. Only by providing true and accurate information can you successfully use the above services. If you refuse to provide such information, we may not be able to protect your personal income rights in a timely manner.

### (II) Scenarios in which you can choose to authorize us to collect and use your data

In order to provide you with better services, you can choose our extended functions, and we will collect and use the following data according to law and your authorization. Such data will be collected in the specific functions and business scenarios you choose, and if you do not provide such data, your use of basic functions will not be affected.

#### 1. Direct marketing

To provide you with updates on our brands, products, services and promotions or other market information (such as discount coupons) or other marketing offers (including co-branded offers on food, beverage and catering services and discounts from affiliates and partners) for direct marketing purposes ("direct marketing"). To the extent permitted by applicable law, this service may be provided by notice, email, advertisement, SMS, phone call and post. We may conduct certain activities and promotions on third-party websites and/or social networks. Such use of your personal data is on a purely voluntary basis. You may object to the processing of your personal data for this purpose and unsubscribe according to our instructions. For example, you may unsubscribe from direct marketing SMS by replying "TD" by SMS according to the SMS prompt. For more about how to modify your preferences for marketing communications, please contact us at the contact details given in "VIII. Contact Us" herein. If you unsubscribe our direct marketing messages, we may also send you non-direct marketing messages, such as e-mails related to your account or our ongoing business relationship.

## 2.Camera-based extended function

To use the upload function, you need to enable the camera permission. Please understand that even if you have agreed to enable the camera permission, we will only acquire relevant data through the camera when you click on the above function in the client. If you do not use the above function, you may reject the permission.

## 3.Album permission-based extended function

You can choose to enable the album permission of the system, and authorize us to access your album by uploading pictures and videos, so that you can publish content by uploading photos or videos. We will collect the above information you choose to upload and publish. You can disable this function in the system permission. Once you disable it, you may not be able to change your avatar by uploading pictures or videos, but your use of basic functions will not be affected.

## 4.Get permission to send notifications to you

In order to improve our products and/or services, provide you with information search and transaction services, or conduct direct marketing with you, we may send you information about transaction performance processes and business. If you do not want to receive push messages or SMS (if applicable) on information about transaction performance processes and business from us, you can disable relevant permission on your mobile phone, that is, you can change the status in "Mobile Settings-Privacy Management-Permission Management" (setting paths vary from manufacturers' models, and you can refer to the manufacturers' setting instructions) to disable push messages from ICC APP, or you can disable relevant permission on WeChat, that is, you can change the status in "Mini Program-Settings-Subscribe Message" to disable push messages from our mini program; or you can disable your permission according to our instructions, for example, you may or can edit and send an SMS reply according to the SMS prompt.

## 5. Personalization (offline and online)

In order to ensure that you continue to enjoy comfortable and caring services in the future, we may collect and store your specific requests. If you agree (and your consent is required), we will record your login account/email address or display name so that you can quickly log in the next time, or easily retrieve products previously placed in your shopping cart, or note down diet and other special requests. We will use relevant data to (i) analyze your preferences and habits,(ii) meet your needs based on the analysis of your personal data, and (iii) improve and personalize your website and APP experience, so as to ensure that the content available on our Website/APP is optimized for you and your computer or device. Such use of your personal data is voluntary, which means that you can object to the use of your personal data for this purpose and revoke your consent in accordance with corresponding instructions. You can also contact us at the contact details given in "VIII. Contact Us" herein.

You understand and agree that the above extended functions may require you to enable your location data (location), camera, and album (gallery) in your device to realize the collection and use of the data involved in these permissions. You can check the status of these permissions one by one in "Mini Program-Settings" and decide when to enable or disable these permissions. Please note that by enabling any permission, you authorize us to collect and use relevant personal data to provide you with corresponding services, and by disabling any permission, you cancel your authorization, and we will no longer collect and use relevant personal data based on the corresponding permission, and will not be able to provide you with the services corresponding to such permission. However, your decision to disable a permission will not affect the previous data collection and use based on your authorization.

### (III) Exceptions to obtaining authorization and consent

You understand and agree that we may collect and use your personal data without your consent in the following circumstances:

- a) related to national security and national defense security;
- b) related to public safety, public health or major public interests;
- c) directly related to criminal investigation, prosecution, trial and enforcement of sentences;
- d) for the purpose of protecting your or other individuals' life, property and other material legitimate rights and interests;
- e) the data collected is disclosed to the public by yourself or is from legal and public channels (such as legal news reports, and government information disclosure);
- f) necessary for concluding and performing relevant agreements or other written documents with you;
- g) necessary for maintaining the safe and stable operation of our products and/or services, such as detecting and dealing with major failures or security vulnerabilities in our products and/or services; and
- h) other circumstances as required by law enforcement agencies, laws and regulations anywhere in the world.

## IV. How We Share, Transfer and Publicly Disclose Your Personal Data

### 1.Share

We value the protection of your personal data. Your personal data is an important basis and component of the products and/or services we provide to you. We only collect and use your personal data for the purposes and within the scope specified herein or in accordance with laws and regulations, and strictly keep it confidential. In general, we will not share your personal data with any company, organization or individual, except in the following cases:

- 1.1 Your prior express authorization or consent has been obtained;
- 1.2 Sharing of your personal data is required by applicable laws and regulations, legal procedures, mandatory government orders or judicial rulings;

1.3 To the extent required or permitted by law, it is necessary to provide your personal data to a third party in order to protect other users of ICC and its Website or APP, or to protect the interests, property or safety of the public from damage;

1.4 Your personal data may be shared with our affiliates. We will only share necessary personal data and such sharing is subject to the purposes stated herein. If an affiliate wants to change the purpose of personal data processing, your authorization and consent will be sought again; and

1.5 In order to provide you with better, high-quality products and services, some of our services will be provided by authorized partners. We may share some of your personal data with our partners, whether located within or outside Hong Kong Special Administrative Region, to provide you with better customer service and user experience. We will only share your personal data for legal, legitimate, necessary, specific, and explicit purposes, and will only share personal data necessary for providing services. Our partners have a duty of confidentiality to us and have no right to use the shared personal data for any other purpose. If you refuse our partners to collect your personal data necessary for providing services, you may not be able to use the third-party services on our platform. Our partners are usually divided into the following categories:

(1) Service providers that provide functional support for our products and/or services, such as payment institutions that provide payment services, and third-party companies that provide delivery services. We share data with them solely for the purpose of implementing the functions of our products and/or services;

2) Partners who entrust us with data promotion and advertising: You acknowledge that we have the right to share analytical/statistical data from our use, de-identification or anonymization of your relevant data with our partners who entrust us with data promotion and advertising to assist them in advertising or making decision recommendations. We undertake that we will not share personal data that can identify you without your consent.

## 2. Transfer

We will not transfer your personal data to any company, organization or individual unless we obtain your express consent. In the event of a merger, acquisition or bankruptcy liquidation, which may involve the transfer of personal data, we will require the new company or organization that holds your personal data to continue to be bound by this Policy. If there is any change in the collection and processing of personal data as agreed herein, the company or organization will re-seek your authorization and consent.

## 3. Public disclosure

3.1 Public disclosure is the act of releasing information to society or unspecified groups. We will not disclose your personal data publicly. If there are reasonable reasons for public disclosure, we will inform you of the purpose and type of data to be disclosed publicly in advance (if your sensitive personal data is involved, we will also inform you of the content of the sensitive data), and disclose publicly after obtaining your authorization and consent, except as otherwise provided by laws and regulations or otherwise agreed herein.

3.2 For your personal data disclosed publicly, we will carefully review its legitimacy, rationality and legality as soon as possible after receiving the application for public disclosure, and take

the strictest personal data security protection measures and means to protect it during and after public disclosure.

#### 4.Exceptions to sharing, transfer and public disclosure of personal data

Please understand that in accordance with the provisions of laws and regulations, your prior authorization and consent is not required for the sharing, transfer and public disclosure of your personal data in the following circumstances:

4.1 directly related to national security and national defense security;

4.2 directly related to public safety, public health or major public interests;

4.3 directly related to criminal investigation, prosecution, trial and enforcement of sentences;

4.4 for the purpose of protecting your or other individuals' life, property and other material legitimate rights and interests;

4.5 the personal data is disclosed to the public by yourself or is collected from legal and public channels (such as legal news reports, and government information disclosure);

4.6 necessary for concluding and performing relevant agreements or other written documents with you; and

4.7 other circumstances as required by law enforcement agencies, laws and regulations anywhere in the world.

## V. How We Store and Protect Your Personal Data

### 1.Data storage

1.1 Storage location: We will store your personal data collected only in Singapore in accordance with laws and regulations. We will comply with the Personal Data (Privacy) Ordinance of Hong Kong and ensure that data recipients will provide a similar and/or comparable level of personal data protection. By voluntarily submitting your personal data to us, you consent to our disclosure, transfer and use of your personal data outside Hong Kong for the purposes described herein.

1.2 Storage period: We will retain your personal data for the shortest period necessary to provide you with products and services. For example, when you use the registration and membership functions of ICC APP, we need to collect your mobile phone number, and after you provide it and during your use of ICC APP, we need to keep your mobile phone number to provide you with these functions normally and to protect your account and system security. In addition, we may retain your data for the necessary period as required by relevant laws.

1.3 After the above storage period, we will delete or anonymize your personal data, unless prohibited by any law or not in the public interest.

### 2.Data protection

2.1 The security of your personal data is important to us. We will strictly abide by relevant laws and regulations, and take reasonable and practicable measures recognized by the industry to protect your personal data from unauthorized access, disclosure, use or modification and from damage or loss.

2.2 We take security measures in line with industrial standards to protect the personal data you provide from unauthorized access, public disclosure, use or modification and from damage or loss. We will take every reasonable and practicable measure to protect your personal data. For example, we will use TLS to encrypt and protect data; we have established an access control mechanism to ensure that only authorized personnel can access personal data; and we will, from time to time, organize training in security and privacy protection to enhance our employees' awareness of the importance of personal data protection.

## VI. Your Rights to Manage Personal Data

We understand your concerns about personal data, and will do our best to ensure that you have the right to access, correct, delete and revoke authorization to your personal data so that you have full ability to protect your privacy and security. You have the following rights:

### 1.Right to access your personal data

You can check the following personal data you have provided to us according to the instructions (or settings) of our products and services:

1.1 Account data: You can log in to your personal center at any time on relevant websites or application pages to access personal data in your account, including avatar, nickname, QR code business card, gender, date of birth, and personal signature (if included);

1.2 Usage data: You can check your usage data at any time on relevant product pages, including history, order information, address information, and billing records; and

1.3 Other data: If you want to access other personal data that is not available to you as described above, you may contact us at the contact details provided herein to get a copy of relevant personal data.

### 2.Right to correct/revise your personal data

2.1 If you find that the personal data you provide to us is incorrect, incomplete or updated, you may correct/revise your personal data in our products and/or services.

2.2 For some of your personal data, we provide you with settings on relevant function pages of our products, and you can correct/revise it directly. For difficulties in exercising the above right, or other online self-correction/revision services that may not be available to you at present, after authentication and without affecting the objectivity and accuracy of the data, you have the right to correct or revise the incorrect or incomplete data, or in certain circumstances, especially in the event of incorrect data, submit your correction/revision request to us through feedback, error reporting and other measures published by us., asking us to correct or revise your data, unless otherwise provided by laws and regulations.

### 3.Right to delete your personal data

3.1 For some of your personal data, you can delete it on the function pages of our relevant products and services. Once you delete it, we will delete or anonymize such data, unless otherwise provided by laws and regulations.

3.2 In the following circumstances, you may directly request us to delete your personal data, unless it has been anonymized or otherwise provided by laws and regulations:

- (1) our processing of personal data violates laws and regulations;
- (2) we collect and use your personal data without your consent;
- (3) our processing of personal data violates our agreement with you;
- (4) you de-register your account; or
- (5) we terminate our services and operations.

#### 4. Right to revoke your authorization to personal data

As mentioned above, relevant permissions to use your device (including location, camera, microphone, and schedule, depending on the actual functions acquired by the products) are required to enable some functions of our products and services. You can revoke (or cease) the continued authorization of such permissions at any time after authorization. You can also permanently revoke all authorization for us to continue collecting your personal data by de-registering your account. Please understand that after you revoke your authorization, we will not be able to provide you with the specific features and/or services corresponding to the revoked authorization. However, your decision to revoke authorization will not affect the previous processing of personal data based on your authorization.

#### 5. Right to de-register your account

You can apply for account de-registration in "Me - Settings - Account and Security - De-register Account" or through customer service. Once you de-register your account, you will no longer be able to log in and use our products and services with that account; all rights and interests that have been produced but not used during the use of ICC and its other products and services as well as future overdue interests under the account will be cleared; and the content, data, records, etc. under the account will be deleted or anonymized, unless otherwise provided by laws and regulations. After the account is de-registered, it cannot be restored.

Should you have any questions about the disposal of your personal data, please contact us at the contact details given in "VIII. Contact Us" herein.

### VII. Protection of Minors

1. In general, we do not collect or process personal data of minors unless we have obtained the consent of their guardians. However, due to technical limitations, in some cases, especially when providing online services, we are unable to identify the age of a user. In such cases, we will assume that the user has a complete and legitimate right to provide his/her personal data to us in accordance with applicable law, and we will collect and process the personal data of underage users in accordance with this Policy. Minors should obtain their guardians' consent before using our products and/or services. If you are a minor, please read this Policy under the supervision and guidance of your guardian(s) before using our products and/or services, and use our products and/or services and submit personal data under the explicit consent and guidance of your guardian(s). We protect the personal data of minors in accordance with the relevant laws and regulations of Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong"), and will only collect, use or publicly disclose the personal

data of minors when permitted by laws and regulations, expressly agreed by guardians or necessary to protect your rights and interests.

2.If you are the guardian of a minor, should you have any questions about the personal data of the minor under your guardianship, please contact us at the contact details given in "VIII. Contact Us" herein. If we become aware that a minor's personal data has been collected without prior verifiable guardian consent, we will delete the data as soon as possible.

## VIII. Contact Us

1.Should you have any questions or inquiries or complaints about the content of this Policy or about personal data and privacy protection during the use of our services, please contact us in any of the following ways:

1.1 Contact the online customer service on the product function page on our platform or submit feedback online;

1.2 Contact us by sending an email to [adminhk@icecreamcookieco.com](mailto:adminhk@icecreamcookieco.com); or

1.3.Contact us by post at Ground Floor and Cockloft of No. 18 Gough Street, Hong Kong

respond to you as soon as possible within 15 working days after receiving your comments and suggestions and verifying your user identity. In addition, please understand and be aware that we will not be able to respond to your request in relation to your personal data in the following circumstances:

2.1 directly related to national security and national defense security;

2.2 directly related to public safety, public health or major public interests;

2.3 directly related to criminal investigation, prosecution, trial and enforcement of sentences;

2.4 for the purpose of protecting your or other individuals' life, property and other material legitimate rights and interests; and

2.5 other circumstances required by law enforcement agencies, laws and regulations anywhere in the world.

## IX. Dispute Resolution

1. This Policy shall be construed, and any dispute shall be resolved, in accordance with the laws of Hong Kong. Any dispute, controversy, difference or claim arising out of this Policy and our processing of your personal data, except in relation to criminal proceedings, shall be submitted for arbitration by an institution administered by Hong Kong International Arbitration Centre ("HKIAC") and ultimately resolved in accordance with the *HKIAC Administered Arbitration Rules* in effect at the time of submission of the notice of arbitration. The arbitration award shall be final and binding on both parties hereto.

2.If you hold that our processing of your personal data has damaged your legitimate rights and interests, you can report it to relevant government authorities.

3.Headings herein are for convenience and reading only, and do not affect the meaning or interpretation of any provision hereof.