



NOBLE GROUP HOLDINGS LIMITED - PRIVACY POLICY

SCOPE

This Privacy Policy ("Policy") describes how Noble Group Holdings Limited and its affiliates ("Noble") treats personal information on our websites where the Policy is located (the "Platform").

TYPES OF INFORMATION WE COLLECT

We collect information from you and about you. Here are some examples of the information we may collect:

- **Contact Information.** For example, we may collect your name, mailing address, telephone number and email address. We may also collect your mobile phone number.
 - **Information You Submit.** We may collect information when you send us a message through the "Contact Us" page or similar features on our Platform.
 - **Identity Verification Information.** For example, we may collect information to verify your identity in order to comply with anti-terrorist financing and anti-money laundering regulations. This may include collecting your name, government identification number (e.g., passports), date of birth, address, country of residence, and financial account information.
 - **Employment Information.** If you apply for a job through our Platform, we collect the information you include in your application. For example, this may include the name and address of your employer and your employment history.
 - **Device Information.** For example, we may collect the type of device you use to access our Platform. We may also collect your device identifier, IP address or mobile operating system.
 - **Other Information.** If you use our website, we may collect information about the browser you are using. We might look at what site you came from, or what site you visit when you leave us.
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HOW WE COLLECT YOUR INFORMATION

We collect your information in different ways. Below are some examples of how we may collect your information.

- **Directly From You.** For example, when you submit an inquiry to us, sign up to receive our newsletter, invest with us, or use our services.
- **Passively.** For example, when you visit and navigate our Platform on any device. We may also collect information about users over time and across different websites and devices when you use the Platform.



- **From Third Parties.** We may receive information about you from other sources. For example, this may include receiving information from our business partners, including analytics vendors.
 - **By Combining Information.** For example, we may combine information that we collect offline with information we collect through our Platform. We may also combine information we collect about you from the different devices you use to access our Platform.
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HOW WE USE YOUR INFORMATION

Examples of how we may use your information include:

- **To Run and Improve Our Platform and Business.** We may use your information to make our Platform and business better. We may also use your information to provide you with information about our business.
 - **To Respond to Your Requests or Questions.** This may include responding to your feedback.
 - **To Communicate With You.** We may communicate with you about your account or our relationship. We may also contact you about this Policy or our Platform terms and conditions.
 - **For Marketing Purposes.** We may provide you with information about our company and our business initiatives. For more information about your choices related to these communications, see the Choices section below.
 - **For Security Purposes.** This could include protecting our company and consumers who use our products and services. It may also include protecting our Platform.
 - **As Otherwise Permitted By Law or As We May Notify You.**
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HOW WE SHARE YOUR INFORMATION

We may share your information in the following ways:

- **Internally.** We may share your information with our parent, subsidiary, and affiliate entities.
- **With Our Service Providers.** We may share your information with third parties who perform services on our behalf. For example, this may include companies that send emails on our behalf or help us run our Platform.
- **With Any Successors to All or Part of Our Business.** For example, if we merge with, acquires or is acquired, or sells part of its business to another entity. This may include an asset sale, corporate reorganization or other change of control.
- **To Comply With the Law or To Protect Ourselves.** For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud.
- **For Other Reasons We May Describe to You.**

CHILDREN UNDER 13

The Platform where this Policy is located are meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 13, and strive to comply with the provisions of COPPA (The Children’s Online Privacy Protection Act). If you are a parent or legal guardian and think your child under 13 has provided us with information, please contact us at DataPrivacy@NobleGroupHoldings.com

You can also write to us at the address listed at the end of this website Policy. Please mark your inquiries “COPPA Information Request.” Parents, you can learn more about how to protect children’s privacy on-line on the site of the Federal Trade Commission.

CHOICES REGARDING YOUR INFORMATION

You have certain choices about how we use your information. Certain choices you make are browser and device specific.

Marketing Communications:

You can opt out of receiving our marketing communications. Note that you will still receive transactional messages from us, including information about your account and responses to your inquiries.

Cookies & Other Tracking Technologies:

- Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. To control flash cookies, which we may use on certain websites from time to time, you can go change your browser’s settings. Why? Because flash cookies cannot be controlled through your browser settings.

Our Do Not Track Policy:

- **Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.** If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.
- Options you select are browser and device specific.

YOUR EU PRIVACY RIGHTS

If you are located in the European Union, you have the right to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you make a request, we will respond to you without undue delay. If you would like to exercise any of these rights, please contact us using the contact information set forth later in this policy.

Should you wish to report a complaint or if you feel that Noble has not addressed your concern in a satisfactory manner, you may contact the supervisory authority of your country. For a list of those supervisory authorities, please refer [here](#).



SECURITY

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use reasonable means to safeguard personal information under our control.

STORAGE OF INFORMATION

Personal information we maintain will be stored in Hong Kong. If you live outside of Hong Kong, you understand and agree that we may transfer your personal information to Hong Kong. We will continue to treat information transferred from the EU into Hong Kong according to relevant EU privacy laws.

LINKS

Our Platform may contain links to other third party sites that are not governed by this Policy. If you click on a link to a third party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third party sites.

HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at DataPrivacy@NobleGroupHoldings.com

CHANGES IN POLICY

From time to time, we may change our Policy. If you have provided us with your email address, we will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates.