

Clipo Privacy Policy

Version Date: November 11, 2025

Introduction

Tezign Tech&Design (HK) Limited (hereinafter referred to as “we”, “us” or “our”) is committed to protecting users’ personal information. We have formulated this **Clipo Privacy Policy** (the “**Privacy Policy**”) to explain how we collect, use, share, transfer, and disclose your information when you use our products and/or services, as well as the methods we provide for you to access, update, delete, and protect such information.

Please note that this Privacy Policy applies only to the [Clipo] products and/or services provided by us and does not apply to products and/or services provided by third parties. Any services provided by third parties are governed by their own service agreements and privacy policies, rather than this Privacy Policy. Please properly safeguard your personal information and provide it to third parties only when necessary.

This Privacy Policy will help you understand the following contents:

- How we collect and use your personal information
- How we use Cookies and similar technologies
- How we share, entrust processing, transfer, and publicly disclose your personal information
- How we protect your personal information
- How we store your personal information
- How you manage your personal information
- How we handle minors’ personal information
- How this Privacy Policy is updated
- How to contact us

This Privacy Policy is closely related to the [Clipo] products and/or services you use and the various business functions included therein. We encourage you to carefully read and fully understand the contents of this Privacy Policy before accessing our products and/or services, so that you can make informed choices as you deem appropriate. **By using our products and/or services, or continuing to use them after we update this Privacy Policy (we will notify you of such updates in a timely manner), you indicate that you agree to this Privacy Policy (including updated versions) and consent to our collection, use, storage, and sharing of your relevant information in accordance with this Privacy Policy.**

If you have any questions regarding this Privacy Policy or related matters, you may contact us using the contact information provided in Article IX. If you do not accept the terms of this Privacy Policy, please immediately stop accessing or using our products and/or services.

I. How We Collect and Use Your Personal Information

“**Personal information**” refers to all kinds of information, recorded electronically or otherwise, that can identify a specific natural person alone or in combination with other information, or that reflects the activities of a specific natural person.

“**Sensitive personal information**” refers to personal information that, once leaked, illegally provided, or abused, may endanger personal or property safety, or easily lead to damage to personal reputation, physical or mental health, or discriminatory treatment. This includes, but is not limited to, identification document numbers, biometric information, bank account numbers, property information, location and movement data, transaction information, and personal information of children under the age of 14 (inclusive).

1. We collect, store, and use the following information related to you in order to provide core functions, without affecting your ability to browse as a guest:

No.	Type of Personal Information	Purpose	Special Notes
1	Email address	Registration/Login; Service notifications	Identity verification via email verification codes
2	Mobile phone number	Registration/Login; Service notifications	Identity verification via SMS verification codes
3	WeChat avatar; WeChat nickname	One-click login	Obtained only through WeChat authorization
4	Voice data	Voice cloning	AI-based deep learning and analysis of uploaded audio to generate voice highly similar to yours
5	Facial image; Voice data	Digital human video creation	Used for digital human modeling and training based on user-provided video

***Special Reminders:**

1. You shall ensure that you have full legal rights to, or have obtained lawful authorization for, any uploaded audio or video. If you use personal information without the explicit consent of the data subject, you shall bear the corresponding legal liabilities.

2. By uploading audio or video, you expressly consent to our collection and use of the personal information contained therein for voice cloning, digital human creation, and training services.

3. If you do not agree to the collection of personal information contained in uploaded content,

please do not upload any audio or video to this platform.

2. During your use of the services, we may collect the following general information:

• **Log information:** When you use the services provided on our website, we automatically collect detailed usage information (including product usage records) and retain it as network logs. For example, operation records, file size/type, application/feature crashes, and other log records.

• **User support information:** Records of inquiries, fault reports, and troubleshooting processes generated during your use of our services, which are used to respond to support requests and improve our services.

3. You fully acknowledge that, in accordance with applicable laws, regulations, and national standards, we may collect and use personal information without obtaining your consent under the following circumstances:

- a) Where it is related to our fulfillment of statutory obligations under laws and regulations;
- b) Where it is directly related to national security or national defense security;
- c) Where it is directly related to public security, public health, or major public interests;
- d) Where it is directly related to criminal investigation, prosecution, trial, and enforcement of judgments;
- e) Where it is necessary to protect the vital interests of you or other individuals, such as life or property, but it is difficult to obtain consent;
- f) Where the personal information collected has been disclosed to the public by you;
- g) Where it is necessary for entering into or performing a contract at your request;
- h) Where personal information is collected from lawfully publicly disclosed information, such as lawful news reports or government information disclosures;
- i) Where it is necessary to maintain the safe and stable operation of the products and/or services, such as identifying and handling faults;
- j) Where it is necessary for news reporting or public opinion supervision in the public interest, within a reasonable scope;
- k) Where it is necessary for academic research institutions to conduct statistics or academic research in the public interest, and where results are provided externally in a de-identified manner;
- l) Other circumstances as provided by laws and regulations.

Please note: If information cannot identify you, either alone or in combination with other information, it does not constitute personal information in the legal sense. Where

information can identify you, or where data that we cannot associate with any specific individual is combined with your personal information, such information will be treated as your personal information during the period of combined use and will be handled and protected in accordance with this Privacy Policy.

4. Rules for the Use of Your Personal Information

- a) We use the personal information collected in accordance with this Privacy Policy in order to provide the functions of our products and/or services.
- b) After collecting your personal information, we will import your information into our backend database through technical means. We have the right to analyze user databases and use them for non-commercial purposes.
- c) Please note that all personal information you provide while using our products and/or services will continue to be authorized for our use during your use of the products and/or services, unless you delete such information or refuse collection via system settings. Upon account cancellation, we will stop using and delete your personal information.
- d) Where we intend to use your personal information for purposes not specified in this Policy, or use information collected for a specific purpose for other purposes, we will notify you in advance and obtain your consent.

II. How We Use Cookies

To ensure proper website operation, provide you with a smoother access experience, and recommend content that may interest you, we may store **Cookies**, **Flash Cookies**, or other local storage provided by browsers or associated applications (collectively, "Cookies") on your device. **Cookies** typically contain identifiers, site names, and certain numbers and characters. With Cookies, websites can store your preferences or data. We do not use **Cookies** for any purposes other than those described in this Privacy Policy. You may manage or delete Cookies according to your preferences. You can clear all **Cookies** saved on your device; most web browsers automatically accept **Cookies**, but you may modify browser settings to reject **Cookies**. You may also clear all saved **Cookies**. If you do so, you may need to change user settings each time you visit the website, and previously recorded information may be deleted.

III. How We Share, Entrust Processing, Transfer, and Publicly Disclose Your Personal Information

1. Sharing

We do not share your personal information with any companies, organizations, or individuals other than us and our affiliates, except in the following circumstances:

- a) Sharing with your explicit consent or authorization, including consent provided under this Privacy Policy and other agreements or rules on our platform.

b) Sharing as required by applicable laws and regulations, legal procedures, or mandatory administrative or judicial requirements.

c) Sharing with affiliates: We may share your personal information with our affiliates. Affiliates refer to entities that control, are controlled by, or are under common control with another party, or can exert significant influence over another party. We will only share necessary personal information and such sharing will be subject to the purposes stated in this Privacy Policy. If our affiliates change the purpose of processing, they will seek your consent again.

d) Sharing with transaction counterparties: We may share your information with counterparties necessary to complete a transaction under agreements between you and such counterparties. For example, for paid services we may share your order records with third-party payment providers (WeChat Pay, Alipay). We only share your information for lawful, legitimate, necessary, specific, and explicit purposes, and the counterparty may only access information involved in the transaction agreement between you and the counterparty (if any).

e) Sharing at your request: Sharing to resolve disputes or controversies between you and others at your request.

2. Entrusted Processing

We may entrust authorized third parties to process your personal information so that they can provide certain services or perform functions on our behalf. We will enter into agreements with such third parties and require them to protect your personal information in accordance with applicable laws and this Privacy Policy. If an authorized third party uses your information for purposes beyond our entrustment, it will obtain your consent separately. Authorized third parties we may entrust include suppliers, service providers, and other partners. The entrusted processing may include providing technical infrastructure services, analyzing service usage, and providing software operations and maintenance services.

3. Transfer

We do not transfer your personal information to any companies, organizations, or individuals, except in the following circumstances:

a) Transfer with your explicit consent: where we transfer your personal information to other parties with your explicit consent.

b) In the event of a merger, acquisition, asset transfer, or similar transaction: where personal information is transferred, we will require the recipient to continue to be bound by this Privacy Policy; otherwise, we will require the recipient to obtain your consent again.

c) As required by applicable laws and regulations, legal procedures, or mandatory administrative or judicial requirements.

4. Public Disclosure

We will publicly disclose your personal information only under the following circumstances, and only after adopting industry-standard security measures:

- a) With your explicit consent, we disclose personal information you designate.
- b) Where required by laws, regulations, mandatory administrative enforcement, or judicial requirements, we may disclose your personal information according to the required type and method of disclosure. Where permitted by laws and regulations, we will require appropriate legal documentation (such as subpoenas or investigation letters). We will carefully review all requests to ensure lawful basis and limit disclosure to data lawfully obtainable for a specific investigation purpose.

IV. How We Protect Your Personal Information

1. We have obtained certifications including **MLPS Level 3, ISO/IEC 27001 Information Security Management System**, and **ISO/IEC 27017 Cloud Service Information Security Management System**. ISO/IEC 27001 and ISO/IEC 27017 are widely adopted global security standards, which demonstrate that our security management meets internationally recognized standards, providing a systematic and continuous method to manage information security and safeguard confidentiality, integrity, and availability of data.

2. We adopt industry-standard security measures, including establishing policies and procedures, security technologies, and regular vulnerability scanning to prevent unauthorized access, use, or modification, and to avoid data damage or loss.

3. Our network services use encryption technologies such as transport layer security protocols and provide browsing services via **HTTPS** to ensure data security in transmission.

4. We retain your personal information only for the period necessary to achieve the purposes stated in this Privacy Policy. Upon expiry of the retention period, if you have not otherwise authorized us or there are no disputes regarding your orders, we will delete your personal information or anonymize it.

5. We only permit access to personal information by employees of us and our affiliates who need such access, and we implement strict access control and monitoring mechanisms. We also require all personnel who may access your personal information to undertake confidentiality obligations; failure may result in legal liability.

6. The Internet is not an absolutely secure environment. Communications via email, instant messaging, and social software may not be fully encrypted. **We recommend that you use complex passwords and protect your personal information when using such tools.**

7. When conducting transactions with third parties through the website, you may inevitably disclose personal information to counterparties, such as contact details or email addresses. **Please properly safeguard your personal information and provide it only when necessary.**

8. In the event of a personal information security incident, we will, in accordance with laws and regulations, promptly inform you of: the basic circumstances and potential impact, measures we have taken or will take, recommendations for risk mitigation, and remedial measures. We will notify you by email, letter, phone call, or SMS. If it is difficult to notify individuals one by one, we will issue public announcements in a reasonable and effective manner. We will also proactively report the handling of the incident to regulators as required.

9. If you have any questions about our personal information protection, please contact us using the contact information at the bottom of this Privacy Policy. If you discover that your personal information has been leaked, especially if your account has been compromised, please contact us immediately using the contact information specified in Article VIII “How to Contact Us”, so that we can take appropriate measures.

V. How We Store Your Personal Information

1. If cross-border transfer is necessary, we will ensure that the recipient has adequate data protection capabilities. We undertake that the storage period of your personal information will always be within a reasonable and necessary period.

2. If we terminate services or operations, we will notify you at least 30 days in advance and delete or anonymize your personal information after termination, except where:

a) We must comply with statutory retention requirements;

b) It is necessary to reasonably extend retention for financial, audit, dispute resolution, or other purposes.

3. During your use of digital human image generation services, we will store facial information and voice information related to the digital human image as required for training and generation. After you delete the digital human image within your account or cancel your account, we will delete all related facial and voice information, and you will no longer be able to use the related digital human image on the platform.

VI. How You Manage Your Personal Information

We place great importance on your attention to personal information and will make every effort to protect your rights to access, correct, delete, and withdraw consent. Your rights include:

1. Access and correction of your personal information

Except where otherwise provided by laws and regulations, you have the right to request access to your personal information. You may click your profile avatar to view, correct, modify, or supplement your personal information. If you find any errors, you have the right to correct inaccurate or incomplete information. You may contact us via email.

2. Deletion of your personal information

You may request deletion of your personal information under the following circumstances:

- a) Where our processing violates laws and regulations;
- b) Where we collect or use your personal information without obtaining your consent;
- c) Where our processing violates our agreement with you;
- d) Where we terminate services or operations.

3. Account cancellation

You may send an account cancellation request to our email address. After account cancellation, we will stop providing products and/or services, and you will no longer be able to log in or perform any operations with the account. **Please note that account cancellation is irreversible; please use this function with caution.**

4. Response to your requests

If you cannot access, correct, or delete your personal information through the above methods, or you need to access, correct, or delete other personal information generated during your use of our products and/or services, or you believe our products violate laws and regulations or our agreement with you regarding personal information, you may contact us by email. We will respond in a timely manner and handle your request within the period prescribed by law. In the following circumstances, we may be unable to respond to your request as required by laws and regulations:

- a) Related to national security or national defense security;
- b) Related to public security, public health, or major public interests;
- c) Related to criminal investigation, prosecution, trial, or enforcement of judgments;
- d) Where there is sufficient evidence of your subjective malice or abuse of rights;
- e) Where responding would cause serious harm to your or others' lawful rights and interests;
- f) Involving trade secrets;
- g) Related to our fulfillment of statutory obligations under laws and regulations;
- h) Necessary to protect vital interests of you or others but it is difficult to obtain consent.

VII. Protection of Minors' Personal Information

1. We place great importance on the protection of minors' personal information. When you use our products and/or services, we assume that you have the corresponding civil capacity. If you are under the age of 18, you should obtain written consent from your parents or legal guardians in

advance. We will protect minors' personal information in accordance with applicable laws and regulations.

2. For minors' personal information collected with the consent of parents or legal guardians, we will only use, share, transfer, or disclose such information where permitted by law, with explicit consent from parents or guardians, or where necessary to protect minors.

3. If we discover that a minor has registered and used our products and/or services without obtaining parental or guardian consent, we will temporarily freeze the account, during which the services will be unavailable. We will attempt to contact the guardian and delete the minor's personal information as soon as possible.

VIII. Updates to This Policy

1. To provide you with better services and as our business develops, this Privacy Policy may be updated accordingly. Without your explicit consent, we will not reduce your rights under this Privacy Policy. We will publish updated versions on the website and notify you before they take effect via website announcements or other appropriate means. **If you click or check to accept the updated Privacy Policy, or continue using our products and/or services, you agree to the revised Privacy Policy.**

2. For material changes, we will provide more prominent notice (such as special prompts on the browsing page).

3. Material changes include, but are not limited to:

- a) Significant changes to our business model, such as the purposes, types, or methods of processing personal information, or new/iterated service products;
- b) Significant changes in ownership structure or organizational structure due to business adjustment, bankruptcy, or mergers and acquisitions;
- c) Changes in the main recipients of personal information sharing, transfer, or public disclosure;
- d) Material changes in your rights related to personal information processing and how you exercise them;
- e) Changes to our contact information for personal information security matters;
- f) Where a personal information security impact assessment report indicates high risk.

IX. How to Contact Us

1. If you have any questions, opinions, or suggestions regarding this Privacy Policy or your personal information, please contact us at any time.

2. Email: clipo.support@tezign.com

3. Upon receiving your feedback, we will reply within the time limits prescribed by law and handle it within a reasonable period in accordance with applicable laws and this Privacy Policy.