

Fosun Tourism Group Personal Data Protection Policy

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INTRODUCTION

Fosun Tourism Group (HK01992) and its affiliates (hereinafter collectively referred to as “**Fosun Tourism Group**”, “**FTG**”, “**We**” or “**Us**”) are aware of the importance of personal data to you. We will take appropriate security measures to protect the security of your personal data in accordance with laws and regulations and mature security standards in the industry. We hereby formulate the “Fosun Tourism Group Personal Data Protection Policy” (hereinafter referred to as the “**Policy**”) to explain to you how we collect, use, transmit, store, provide and protect your personal data during your use of our products and/or services, as well as how we provide you with the means of accessing, updating, deleting and protecting such personal data.

【Note】 Before you use the products and/or services provided by Fosun Tourism Group, please be sure to read and fully understand this Policy, you should especially focus on the terms and conditions in bold font. You should start using the products and/or services provided by FTG after confirming that you fully understand and agree to this Policy. If you have any questions, comments or suggestions regarding the contents of this Policy, you may contact us through the contact information provided in Article 11 of this Policy.

This policy will mainly explain to you:

- I. The scope of application of this Policy
- II. How we collect your personal data
- III. How we use your personal data
- IV. How we use cookies and similar technologies
- V. How we share, consign, publicly disclose and transfer your personal data
- VI. How we store and transfer your personal data across borders

- VII. How we protect your personal data
- VIII. How we protect children's personal data
- IX. How you can exercise your personal information rights
- X. Revisions and notices of this Policy
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I. The scope of application of this policy

This Policy applies to the products and/or services provided to you by Fosun Tourism Group, including but not limited to: [Club Med and others], [Atlantis Sanya], [Vacation Asset Management Center (including Taicang Alps International Resort and Lijiang Mediterranean International Resort)] and [Foryou Club and other services] hereinafter collectively referred to as “products/services of Fosun Tourism Group”.

In addition to this Policy, if any of FTG's products and/or services have issued a separate personal data protection policy (collectively referred to as “Product Personal Data Protection Policies”), we recommend that you read it carefully before using such products and/or services to help you better understand our products and/or services and make appropriate choices.

If you are a child or a guardian of a child, we recommend that you carefully read Article 8 of this Policy on the rules governing the protection of children's personal data in Fosun Tourism Group to help you better understand how we protect children's personal data.

Each product's personal data protection policy is an important part of this Policy. If there is any inconsistency between each product's personal data protection policy and this Policy, that product's personal information data policy shall take precedence, and this Policy shall prevail only if it is not so specified in each product's personal data protection policy.

II. How we collect your personal data

(i) Personal data you provide when using our products or services

1. Account Information

After you register an account, you can use certain functionalities to review, reserve and/or buy products and/or services. The personal data you must provide when registering for an account is your personal phone number, and the personal data you can choose to provide includes your avatar, community nickname, real name, gender, date of birth, and regional information, etc.

2. Information necessary to use functionalities to review, reserve and/or buy products and/or services

In the process of providing you with our products and/or services, you may be required to provide specific personal information to access relevant functionalities. If you choose not to provide such information, we will not be able to provide you with the specific functionalities mentioned above, but it will not affect your use of other functionalities relating to other products and/or services.

When you use our **online products and/or services**, you are required to provide certain personal information to access relevant functionalities. For example, when you book an air ticket through our platform, you are required to provide personal information such as passenger's name, type of ID, ID number, personal phone number, etc. If you choose not to provide the aforementioned personal information, Foryou Club will not be able to provide you with air ticket booking functions, but it will not affect your ability to search for and browse flight information; in addition, you can also choose to provide the airline membership card number in order to obtain mileage accumulation services. If you choose not to provide such personal information, it will not affect your ability to book air tickets through Foryou Club platform.

When you use our **offline products and/or services**, you will be required to provide certain personal information to access relevant functionalities. For example, during your vacation at our Club Med resorts, you may be required to provide personal information such as your name, personal telephone number, identification information, etc., in order to check in, and if you choose not to provide the aforementioned personal information, Club Med will not be able to process your check in; in addition, you may provide your name, personal telephone number, in order to participate in the activities of the resort, and if you choose not to provide such personal data, it will not affect your other arrangements at the Club Med resort.

(ii) Personal data we obtain in the course of your use of our products and/or services

When you use our products and/or services, we will collect information about your device, log information about your interaction with Fosun Tourism Group's products, such information includes:

1. **Device information:** including basic device information such as device model, device operating system type, operating system version, device settings (e.g. region/language/time zone/font size), and device identifiers such as MAC address, IMEI, IDFA, OAID, Android ID, and so on;

2. **Log-in information:** including browsing, searching, records, transaction orders, after-sales, information sharing.

3. **Other related information:** if you use location-related services, we may record the **precise** or **approximate location** information of your device, which may be obtained through **GPS** location, **WLAN** access point, Bluetooth and base station, etc. We will ask you whether to enable the **location privilege**; you can also choose to turn off the above privilege according to the path provided by us, and such choice will not affect the use of your other products or services. This will not affect your use of other functionalities relating to other product or service, but only the functionalities related to geolocation.

(iii) Personal information we collect by indirect means

When you use the functionalities relating to services and advertisements which are provided by our affiliates and partners, we may, depending on the functionalities or services' requirement and with your authorization, receive and use your personal data collected by our affiliates and partners .

III. How we use your personal data

In accordance with the “Personal Data Protection Act” and other relevant laws and regulations, we will only collect and use your personal data on the premise when there is a legal basis to do so, i.e., we may use your personal data **on the basis of your explicit consent, separate consent, necessary for the conclusion/performance of the contract between you and Fosun Tourism Group,**

for the fulfillment of Fosun Tourism Group's legal obligations or statutory duties, and to process the data that you disclose to us within a reasonable framework, more particularly to use your personal data for the following purposes;

(i) To register, generate and display account information for you so that you can experience richer product functionalities;

(ii) To provide you with functionalities to review, reserve and buy products and services;

For example, in order to provide you with services such as airline or hotel reservations, activities in resorts, etc., we may use the personal data collected for the purpose of accomplishing what you have instructed us to do, such as completing a particular booking transaction, or signing up for an activity.

(iii) Personalized recommendation services;

We may use the collected information (e.g. your search history, browsing information) to show you information about products and/or services that interest you.

(iv) Communication with you;

If you ask to be contacted, we will contact you, send you information about products and services that may be of interest to you, invite you to participate in our research questionnaires, etc.; we strictly follow the requirements of laws and regulations, and do not frequently disturb you through text messages, phone calls, emails and so on.

(v) Operation and Security;

We are committed to providing you with safe and trustworthy products and use of the environment, to provide high-quality, efficient and reliable services and information is our core objective. We may use your information for identity verification, security prevention, fraud prevention, etc.

(vi) Statistical analysis;

We may compile statistics on the use of our products and/or services and conduct certain statistical analyses designed to improve the quality of our products and services and to conduct industry research. The above statistical information does not contain any identification information about you.

(vii) Fulfillment of Legal Obligations or Duties;

When you use certain features of our products and/or services (e.g., booking tickets for specific attractions), real-name authentication may be required in accordance with

relevant laws and regulations, in such case you will need to provide us with your **real identification information** (your real name, **credential information (e.g., identity card number or ID card information)**) in order to complete the real-name verification. **Identification information** belongs to sensitive personal data, you can refuse to provide it, but you may not be able to obtain the relevant services.

Please note that in the wide range of products and services we provide to you, we will use your personal data according to the specific range of products and/or services you choose to use. In order to provide you with better products and services, we may from time to time introduce updated or optimized features that may increase or change the purpose, scope and manner in which we collect and use your personal data. In this regard, we will separately explain to you the purpose, scope and manner of collection and use of the corresponding personal data by updating this Policy or other appropriate notification methods, and to satisfy the lawful basis. If you have any questions, comments or suggestions during this process, you may contact us using the contact information provided in Article 11 of this Policy.

IV. How we use cookies and similar technologies

In order to make your visit easier and more convenient, when you visit Fosun Tourism Group websites, we may store small data files called cookies on your device terminal or system to identify you, which can help you save the steps of repeatedly entering registration information, help you optimize the selection of advertisements and interactions, and help determine the security status of your account. **We promise that we will not use cookies for any purpose other than those described in this Policy.** You can erase all cookie stored on your computer or mobile device, you have the right to accept or decline cookies, and if your browser automatically accepts cookie, you can modify your browser settings to decline cookies as per your needs. Please note that if you choose to decline cookies, you may not be able to enjoy a better experience with the services we offer.

V. How we share, delegate, publicly disclose and transfer your personal data

(i) Sharing and Provision of Your Personal Data

When you use the products of Fosun Tourism Group, we will not provide your personal data to third parties, except for the cases mentioned below and in the Personal Data Protection Policy, which are necessary to carry out the transaction, to provide products and services to you, and to meet the legal requirements .

When we share or provide your data with third parties, we will inform you in advance, in a reasonable manner, of the name or names and contact details of the companies, organizations or individuals who will be providing you with products and/or services, as well as the purpose of their handling of your personal data, the manner of their processing, and the types of personal data, which will comply with the applicable legal requirements. Please refer to the specific product and/or service order page for more details.

We strictly evaluate the legality, legitimacy and necessity of the collection of your personal data by third party companies, organizations and individuals. At the same time, we require the third party to take the necessary information management measures and security technology means to prevent leakage, destruction, loss, tampering and other consequences to your personal data, so as to better protect your personal data.

1. Provide personal data under legal circumstances: We may provide your personal data in accordance with laws and regulations, or as required by administrative agencies, courts or other legal regulatory bodies.

2. We may share your personal data with our affiliates to enable us to provide you with travel-related or other products or services, provided that applicable legal and administrative requirements are complied with. For example, Club Med may share your personal data with its affiliates to provide membership management and reservation services. Our affiliates will take no less stringent protection measures than those in this Policy.

3. We may share your order information, account information, device information and location with third parties, such as partners, to ensure the successful completion of the services to be provided to you, subject to applicable

legal and administrative requirements. The classification of our partners include airlines, hotels and other travel service providers and agents, financial institutions and third-party payment institutions, business partners that provide courier services, communication services, customer service, marketing, advertising, technical services, real-name authentication services and consulting services.

(ii) Entrusting the handling of your personal data

In order to provide you with better and high-quality products and services, we may entrust the processing of certain of your personal data to external service providers. We will sign a consignment processing agreement with the external service providers to which we entrust the processing of your personal data, and **require the consignee to process personal data in accordance with the consignment processing agreement, this Policy, and any other relevant confidentiality and security measures, and we supervise the partner's personal data processing activities.** In the event that the entrusted relationship is not effective, invalid or revoked or terminated, we will require the entrusted party to return and delete your personal data.

(iii) Public disclosure of your personal data

We will not publicly disclose your personal data to any company, organization, or individual, except as expressly stated in this Policy. In the event that public disclosure is necessary to comply with laws and regulations (e.g., when your personal data must be provided pursuant to laws and regulations, mandatory enforcement law, or judicial order), we will require that legal documents, such as subpoenas or letters of inquiry be provided and that the appropriate legal base is valid upon receipt of a request for disclosure of the information described above.

(iv) Transfer of your personal data

With the continuous development of our business, when a merger, acquisition, asset transfer or similar transaction occurs that involves the transfer of your personal data to a new company or organization, **we will inform you of the name and contact information of the company or organization receiving the information prior to the formal transfer of the information, and we will require the new company receiving your personal data to continue to protect your personal data in**

accordance with laws and regulations, and with a standard of care no lower than the standard required by this Policy.

VI. How we store and transfer your personal data across borders

(i) Storage location

We will store your personal data collected in the People's Republic of China within China in accordance with applicable laws and regulations. We will not transfer such data outside of China unless it is in compliance with laws and regulations. In the event that there is a scenario of personal data leaving the country as described in this Policy, or your personal data storage location is transferred from China to a place outside the country due to business needs, we will strictly follow the applicable laws and regulations, inform you in a reasonable manner of the service providers of the products and/or services involved both inside and outside the country, i.e., the name of the recipient outside the country, its contact information, its purpose of processing your personal data, the way of handling, the type of personal data and methods and procedures for exercising your rights as a subject of personal data with overseas recipients, and satisfy the appropriate legal framework. If you have given your separate consent, this will be in the form set out on the ordering page of the product and/or service.. We will take necessary measures in accordance with laws, administrative regulations and the provisions of the Competent National Internet Information Department to require overseas organizations to keep your personal data confidential and fulfill the corresponding personal data protection obligations, and to ensure that their personal data handling activities meet standards not lower than those applicable under Chinese laws.

(ii) Storage period

We will retain your personal data only for the period necessary for the purposes described in this Policy, or for the time period required by laws and regulations. We may delete or anonymize your personal data after the storage period described above, or if you exercise your right to delete your personal data or cancel your account.

In the following cases, we may adjust the storage period of personal data to

comply with legal requirements:

1. To comply with applicable laws and regulations and other relevant provisions (e.g., the E-Commerce Law stipulates that transaction information on goods and services shall be stored for a period of not less than three years from the date of completion of the transaction);
2. For the purpose of complying with the provisions of court orders and rulings or other legal procedures;
3. For the purpose of complying with the requirements of relevant government agencies or legally authorized organizations;
4. For purposes reasonably necessary to safeguard the public interest of society, to protect personal and property safety or other legitimate rights and interests of us, our affiliates, other users or employees.

VII. How we protect your personal data

Fosun Tourism Group attaches great importance to the security of personal data. We strictly comply with the laws and regulations related to personal data, adopt appropriate management, technical and physical security measures, and establish an information security protection system that is in line with the development of our business, with domestic and international information security standards and with best practices.

(i) We have established a sound data security management system.

We have set up a specialized personal data protection team, which is responsible for supervising personal data processing activities and corresponding protection measures. We strictly manage employees who may come into contact with your personal data, implement an approval mechanism for important operations such as data access, internal and external transmission and use, desensitization and decryption, and sign a confidentiality agreement with relevant employees, requiring them to comply with confidentiality obligations. At the same time, we also regularly conduct data security training for our employees, requiring them to form good operating habits in their daily work and enhance their awareness of data protection.

(ii) We have adopted adequate technical measures for data security.

From the perspective of the life cycle of data, we have established security measures in all aspects of data collection, storage, display, processing, use and destruction, and have adopted different control measures according to the level of sensitivity of personal data, including but not limited to access control, SSL encrypted transmission, encrypted storage with encryption algorithms of AES or above strength, and desensitized display of sensitive information.

(iii) We would like to inform you about the security of your personal data.

Despite the aforementioned management and technical security measures, there are no “comprehensive security measures” on the Internet. We will provide appropriate security measures to handle and protect your personal data in accordance with available technology, and will endeavor to ensure that your personal data is not disclosed, damaged or lost.

We recommend that you use complex passwords when using communication tools such as email, instant messaging, social software, etc., and pay attention to protecting the security of your personal data. When you use our products and/or services, please keep the device you use to log in as well as your account name and verification code information in a safe place, and do not provide the device to others for logging in to Fosun Tourism Group's products or services, or inform others of the verification code. If you find that your personal data has been leaked, in particular, your account name and verification code have been leaked, please contact us immediately, so that we can take corresponding measures.

When you use Fosun Tourism Group's products and/or services for online transactions, please protect your personal data properly and do not provide it to others easily. We will do our best to protect the security of any information you send to us. Once you leave Fosun Tourism Group's products and/or services, browse or use other products and/or services provided by third parties, we will not be able to and are not directly obliged to protect any personal data you submit to the third parties, regardless of whether your login, browsing or use of the said products or services is based on our links or guidance. We will draw your attention

to the fact that you will be accessing a third party product or service so that you can better protect your personal data.

(iv) Our emergency response mechanism for personal data security incidents

Upon the unfortunate occurrence of personal data security incident, we will inform you in accordance with the requirements of laws and regulations of: the circumstances of the security incident and their possible impact, the mitigation measures we have taken or will take, the suggestion of actions you can independently take to prevent and reduce the risk, and the remedial measures for you. We will inform you of the incident-related situation by email, letter, phone call, push notification, etc. When it is difficult to inform the subject of personal data one by one, we will take a reasonable and effective way to make a public announcement. At the same time, we will also report on the handling of personal data security incidents in accordance with the requirements of the regulatory authorities.

VIII. How we protect children's personal information

Fosun Tourism Group attaches great importance to the protection of minors' personal data. We protect the personal data and privacy of minors in accordance with the requirements of the Law of the People's Republic of China on the Protection of Minors and other relevant national laws and regulations.

If you are a minor under the age of 18, you should obtain the prior consent of your legal guardian before using our products or services. If you are a guardian, you may take appropriate precautions to protect the security of the minor's personal data, as well as to supervise his/her use of our products and/or services.

Fosun Tourism Group will not take the initiative to collect personal data from minors directly. With regard to the personal data of minors collected with the consent of their guardians, we will only handle it when permitted by laws and regulations, with the consent of the guardian, or when it is necessary for the protection of minors. **If it is found that we have collected personal data from a minor without first obtaining verifiable consent from the guardian, we will take steps to delete the relevant data**

as soon as possible. If it is proven that a minor has registered and used our products and/or services without the consent of a guardian, the guardian may contact us and we will try to delete the personal data of the minor concerned as soon as possible after confirmation.

In particular, for the personal data of children under the age of 14, we will follow the principles of justified necessity, informed consent, clear purpose, safety and security and utilization in accordance with the law and regulations such as the “Provisions on the Network Protection of Children's Personal Data” in collecting, storing, using, transferring, disclosing and other handling of children's personal data.

If you are a child under the age of 14, before you use the products and/or services of Fosun Tourism Group, you and your guardian must carefully read the rules for the protection of children's personal data set forth in each of our products and/or services, and make sure that your guardian confirms that he/she agrees to the relevant rules.

Before you, as a guardian, choose to use Fosun Tourism Group's products or services for a child under your custody, please be sure to read carefully the rules for the protection of children's personal data set forth in each of our products and/or services and choose whether or not to agree to them. If you agree to such rules and choose to use our products and/or services for a child, we may need to collect personal data of children under your custody from you for the purpose of performing related services to you. If you choose not to provide such information, you may not be able to take advantage of our products and/or services. In addition, you may voluntarily provide us with personal data of children when you use certain features (e.g., comments), so please be aware of this and choose carefully. As a guardian, you should properly fulfill your responsibilities as a custodian and protect the security of children's personal data. If you do not agree with the foregoing rules or refuse to provide us with the personal data of the children in your custody, it may result in our inability to provide you with normal services or to achieve the expected results of the products and/or services provided by us, and you should stop registering or using the products and/or services provided by us immediately. If you use or continue to use our services, you will be deemed to have consented to the collection, storage, use, transfer, disclosure, etc. of the personal data of the children in your

custody by us in accordance with this Policy and the rules on the protection of children's personal data for the specific products and/or services.

If you have any comments, suggestions or requests for rights regarding matters relating to the personal data of children under your custody, please contact us.

IX. How you can exercise your personal data rights

(i) How to access, copy, correct, delete and manage your personal data

1. In the course of your use of our products and/or services, you have the right to access, copy, correct, delete and manage your personal data. You can access, copy, correct and delete your account information, contact information, order information and other personal data that you have provided to us in the personal data control interface (e.g., “Personal Center”, “Edit Profile” and other interfaces) in specific products; you may also be able to access, correct, and delete personal data such as your usage history (e.g., comments, logins, interactions, etc.) through mechanisms designed within specific products.

2. Obtaining a copy of your personal data. To obtain a copy of your personal data, you may contact us, or you may contact the relevant person according to the contact information in the product-specific personal data protection policy. We will provide you with a copy of your personal data (including basic information, identity information) in our products and/or services after we have verified your identity, unless otherwise provided by law or regulation, or as otherwise agreed in this Policy.

3. Please note that for security and identification reasons, you may not be able to independently modify some of the personal data (such as real-name authentication information) that you have provided in connection with our specific products and/or services, and if you need to change or delete the relevant personal data, please contact us.

(ii) How to change the scope of your authorized consent or withdraw consent

When we process your personal data based on your consent, you have the right to change the scope of your authorized consent or withdraw your consent at any time. You may withdraw your consent or authorization by following the specific path

informed in the Personal Data Protection Policy of our products.

Please note that the business functions of our products and/or services may require some basic personal data in order to be realized, and when you withdraw your consent, we may not be able to continue to provide you with the corresponding services, and we will no longer process the corresponding personal data. However, your above actions will not affect our previous processing of personal data based on your authorization, nor will it affect our processing of your personal data on other legitimate bases.

(iii) How to cancel your account

You can cancel your account through the path and method disclosed in our specific products or/and services, please note that the cancellation of an account is irreversible. After you cancel your account, all of your personal data in the account will be cleared, and we will stop collecting, using or sharing personal data related to the account, but we may still keep it as long as required by law or regulation.

(iv) We respond to your request

If you are unable to access, copy, correct, delete and manage your personal data and change your authorization, withdraw your consent, cancel your account through the above methods, or if you need to access, copy, correct, delete and manage other personal data generated by your use of our products and/or services, or if you need to obtain a copy of your personal data, or if you believe that we are in violation of any law or regulation or our agreement with you regarding the collection or use of your personal data, you may contact us via the contact information in Article 11 of this Policy.

For security purposes, we may require you to provide us with a written request, or provide us with documentation of your identity, and we will respond to your request within fifteen business days of receiving your feedback and verifying your identity. For your reasonable requests, we do not charge fees in principle, but for multiple repeated requests that exceed reasonable limits, we will charge a fee as appropriate. We may refuse requests that are unnecessarily repetitive, require excessive technical means (e.g., requiring the development of a new system or a fundamental change in existing practices), pose a risk to the legal

rights of others, or are highly impractical (e.g., involving the backing up of information stored on a server). In the following cases, we may not be able to respond to your requests as required by law or regulation, when the response is (or will) :

1. Directly related to national security and national defense security;
2. Directly related to public safety, public health, and significant public interests;
3. Directly related to crime investigation, prosecution and trial and execution of judgment, etc;
4. Directly related to the fulfillment of our obligations under laws and regulations;
5. For a request where there is sufficient evidence of subjective malice or abuse of rights on your part;
6. Lead to serious damage to the legitimate rights and interests of you or other individuals or organizations;
7. For the purpose of safeguarding the life, property and other significant legitimate rights and interests of you or other individuals, but there are substantial difficulties in obtaining your consent;
8. Involving trade secrets.

X. Revisions and notices of this Policy

In order to provide you with better products and services and with the development of Fosun Tourism Group's business, we may revise this Policy from time to time. We will mark the date of the most recent update of this Policy and make it effective after it has been posted on the official website of Fosun Tourism Group (<http://fosunholiday.com>). **We will not reduce your rights under this Policy without your express consent.**

For significant changes, we will send you notices (including, for specific services, email notices describing the specific changes to this Policy). You can check frequently to keep up to date with the latest version of this Policy.

Material changes referred to in this Policy include but not limited to:

1. Significant changes in our service model. For example, the purpose of processing personal information, the type of personal information processed, and how personal information is used;

2. Significant changes in our ownership structure, organizational structure, etc. such as changes in ownership caused by business restructuring, bankruptcy and mergers and acquisitions;

3. Changes in the main targets of sharing, transferring or publicly disclosing personal information;

4. Significant changes in your right to participate in the handling of personal information and how it is exercised;

5. Changes in the department responsible for the handling of personal data security, contact information and complaint channels;

6. When the security impact assessment report of personal data indicates the existence of high risk;

7. Other changes that may have a significant impact on your personal data rights.

XI. How to contact us

1. If you have any questions, comments or suggestions about this Policy or matters related to your personal data, you can contact us by sending an e-mail to [privacy@fosunholiday.com].

2. We have also established a dedicated department for the protection of personal data, you can contact us by sending an e-mail to the e-mail address[privacy@fosunholiday.com] of our personal data protection officer.

3. In general, we will reply within fifteen days. If you are not satisfied with our response, especially if our personal data processing behavior has damaged your legitimate rights and interests, you can also seek a solution by filing a complaint or report to the regulatory authorities such as Netcom, Telecom, Public Security and

Market Supervision and Administration, or by filing a lawsuit with a court of competent jurisdiction in the place of the defendant's domicile.