



Policy Statement on Privacy Protection of Lufax Holding Ltd.

Amidst the era of big data, personal privacy protection becomes critically important and has been incorporated as an important indicator of the corporation's ability to build up reputation and trust among users. Lufax Holding Ltd. ("Lufax" or "the Company") regards privacy protection as the top priority in information security and data governance and is committed to a responsible and legal approach in managing personal privacy.

Applicable Scope

This policy statement is applicable to all the departments and employees of Lufax and its member companies as well as all the personal information collected by Lufax's various business units.

Fundamental Principles for Personal Information Protection

Lufax's business is conducted based on mutual trust with its users. To safeguard all the information provided by users with rigorous confidentiality, Lufax has adopted the following fundamental principles for personal information protection:

- At Lufax, the "minimum necessary" standard is implemented in the collection of information as required to provide services or conduct businesses.
- Lufax keeps the information collected from users in strict confidence and would not disclose the information to any external organisations except for the following circumstances when:
 - the disclosure is approved by users;
 - the disclosure is required by laws and regulations;
 - the disclosure is required by the governments or management bodies;
 - the disclosure is required by superior regulators of Lufax.
- Lufax strives to ensure the accuracy and timeliness of information collected over users.

Management of Personal Information

1. Commitment to personal information security

Security is Lufax's primary requirement for the management of personal information. To fulfil the commitment to information security, Lufax adopts various security technologies and necessary management systems to prevent users' information from being leaked, destroyed, misused, or accessed, disclosed or changed without authorisation. Lufax abides by all the regulations regarding personal information protection.

2. Principles for collecting personal information

Adhering to the principles of legitimacy and necessity, Lufax expressly states the rules and purposes regarding information collecting and using and gets users' consent and permission in the form of written agreement. The personal information collected by Lufax with authorisation and those derived from the provision of services are used only for what has been specified in the agreement.

3. Information disclosure to external parties

Lufax and its partners assume confidentiality obligations with respect to users' personal information and will not rent, sell, provide, share or transfer such information to any companies, organisations or individuals, unless it is for the provision of any sufficiently approved necessary services or it is required by the laws, in which case Lufax will inform the data subjects of the purpose of use as well as data type and seek consent from them. Before providing the personal information collected or processed to others, Lufax should inform the data subjects of the receiving party's name and contact details, the processing purpose and methods as well as the types of personal information involved, and seek consent from the data subjects. If the processing purpose and methods need to be changed, Lufax should, in line with relevant laws, obtain new consent from the data subjects, and accurately record the details of information uses and retention, so that the data subjects could keep track of how their information is retained, used, etc. by the receiving party.

4. Retention of personal information

Unless otherwise provided by law, Lufax only keeps personal information for a period required to fulfil the purpose for which it has been collected and keeps

personal information according to local laws and regulations in the place where the business is conducted.

Lufax determines the retention period mainly based on applicable laws and regulations (such as the Cybersecurity Law, which requires weblog to be retained for no less than six months, the E-commerce Law, which requires the information of products and services as well as transaction information to be retained for no less than three years since the date at which transaction is completed, the Anti-Money Laundering Law of the People's Republic of China, which requires the user's identity information to be retained for at least five years since the year in which the business relationship ends). The decisions are made as follows:

1. For the personal information involved in fulfilment of product contracts and account management: Lufax continues to retain the user's personal information for a reasonable period after it is no longer used;
2. For the accounts created by users: Lufax continues to retain users' personal information provided under such accounts for a reasonable period after the accounts are closed;
3. If laws and regulations require otherwise, or Lufax and its users agree otherwise, the retention period defined in such requirement or agreement shall prevail.

Lufax will, in line with relevant laws, delete or anonymise users' personal information upon the termination of retention period. If it is technically difficult to delete personal information, Lufax will cease all types of processing other than storage or necessary security measures.

Before ceasing certain business or the operation of any website, Lufax will notify users in advance, cease to collect relevant personal information and delete or anonymise the personal information within a reasonable period.

User's Rights on Personal Information

In accordance with laws, users are entitled to the following rights and choices regarding their personal information and Lufax fully respects their rights and choices and safeguards the exercise of such rights.

1. Right to know and decide

Users have the right to be informed and to decide as to how the personal information is processed by Lufax and they can restrict or reject the processing of personal information unless otherwise provided by laws and regulations.

To the extent permitted by law, Lufax may collect or use users' personal information without their consent. Where required by law, Lufax will seek individual consent from users for the processing of personal information in specific circumstances.

Users who have any doubts about Lufax's rules regarding personal information processing or this policy can reach out to Lufax for explanation of such rules or policy through the contact details provided at any of Lufax's platforms and products.

2. Right to access

Users have the right to access their own personal information by observing relevant laws and regulations.

3. Right to rectification and supplement

Users who find their personal information inaccurate or incomplete have the right to correct or supplement such information and apply to Lufax for information correcting or supplementing through the means provided at "Contact Lufax".

4. Right to copy and transfer

Users have the right to copy their personal information kept by Lufax and, in compliance with laws and regulations, request Lufax to transfer their personal information to the designated processor, for which Lufax is obliged to provide the transfer channel in accordance with laws.

5. Right to change the scope of permission

Users have the right to change the scope of permission or withdraw the permission with which Lufax is allowed collect and process their personal information.

Following the exercise of such right, Lufax can no longer provide to the user services allowed with the prior permission, which, however, will not affect the past personal information processing conducted based on the prior permission.

6. Right to deletion

Users have the right to request Lufax to delete their own personal information or apply to Lufax for account closure in order to delete the information. They can make the request through the means provided at “Contact Lufax” to delete the information.

The right to delete is not absolute. Users have the right to request Lufax to delete their personal information only under legal circumstances. In addition, Lufax might not be able to delete certain personal information due to technical restrictions or legal requirements regarding retention period, but Lufax will cease all types of processing other than storage or necessary security measures. Please refer to the “Retention of personal information” in this policy for details about the retention of personal information.

7. Right to close accounts

Users have the right to close their personal account through application. Before closing the accounts, Lufax will verify user’s personal identity, security status, device information, etc. and delete the user account from Lufax’s official website. After the account closure, all the user’s information under the account will be deleted altogether or anonymised unless otherwise provided by law. Account closure is irrevocable, and users should be cautious in taking such action.

8. Personal information protection for deceased users

To protect legal and legitimate interests of deceased users, Lufax allows their close relatives to make a request to Lufax in accordance with relevant laws to access, copy, correct or delete the personal information of the deceased, upon which Lufax may give them permissions accordingly unless otherwise required by the deceased users before the death.

9. Response to your requests

Lufax fully respects users’ rights regarding their personal information and fully respond to their requests to exercise such rights.

In principle, Lufax does not charge any fees for reasonable requests. However, it may, considering the circumstances, charge a certain amount of fees for multiple, repetitive or unreasonable requests. Lufax may reject users’ requests that involve the personal information of other users, require excessive technical means (such as the development of a new system or a radical change of current procedures), or

may infringe on the legitimate interests of others or the requests that are unreasonable or impractical; Lufax may also reject requests for legal and legitimate considerations with explanation provided.

All the products and services are offered with channels for access, changes, communication and complaint regarding privacy information, through which users can access and manage their personal information and exercise their rights. Any change or update of privacy policies will be promptly communicated to users and require users' consent to take effect.

10. Other channels

Users can also access all the websites of Lufax through links provided at other non-Lufax's websites. Lufax recommends users to read the policies regarding personal information protection of such websites to understand how they process personal information. Such websites independently assume responsibilities for such conducts as collecting, using, retaining, sharing, transferring, disclosing the personal information.

This policy of personal information protection does not apply to other third-party products/services that users get through the services/products provided by Lufax. Please refer to the privacy policies of third parties or similar statements.

Personal information protection for minors

Lufax attaches great importance to the personal information protection for minors. Users who are under the age of 14 should obtain a written approval from their parents or legal guardians before using Lufax's services. Lufax protects the confidentiality and security of minors' personal information in accordance with relevant national laws and regulations.