

VOGHION LAW ENFORCEMENT GUIDELINES

Voghion LLC (“Voghion”) designed these Guidelines for responding to law enforcement agencies and judicial authorities (“Requesting Authority”) outside the People’s Republic of China (“PRC” or “China”) seeking information (“User Information”) regarding users of Voghion.com (“Users”). Voghion.com is an e-commerce platform that connects buyers and sellers from around the world, providing a marketplace for both business-to-business and business-to-consumer transactions. Voghion is committed to cooperating with law enforcement to the best of its ability and within the bounds of applicable laws and regulations, including the data privacy and national security laws of the PRC.

These Guidelines are intended to facilitate the transmission and processing of requests for User Information from Requesting Authorities and are not binding on Voghion. Voghion reserves all rights of interpretation and application of these Guidelines, which are subject to change without notice. Nothing in the Guidelines shall be used to create or be construed as changing any legal obligations or otherwise alter Voghion’s legal and equitable defenses.

I. INTRODUCTION

a. General

Voghion strives to assist the Requesting Authority perform its duties to the extent permitted by all applicable laws and regulations, while respecting the privacy of all Users of the platform.

b. Definitions

“User” means any natural person or corporate entity that uses Voghion’s e-commerce platform (*i.e.*, Voghion.com) to buy, sell, or promote goods and services.

“User Information” includes content information and non-content information.

“Content Information,” as defined in the Stored Communications Act (United States), means any communication including information “concerning the substance, purport, or meaning,” including data stored on a User’s account, such as photos, comments, and direct messages.

“Non-Content Information” includes basic subscriber information, such as the User’s name, address, email address, billing information, and date of account creation.

“Law Enforcement” includes any department, agency, or other public organization responsible for enforcing laws and regulations, conducting investigations, and other policing functions.

“Requesting Authority” means a law enforcement agency or judicial authority outside the PRC that seeks information from Voghion to assist with criminal investigations or other enforcement actions.

“Personal Information” means any information related to identified or identifiable natural persons stored in electronic or any other format. Personal Information includes, but is not limited to an individual’s address, phone number, date of birth, credit record, and employment history.

II. TYPES OF REQUESTS

a. Preservation

Voghion accepts formal requests to preserve specified records or data, pending the issuance of valid legal process, for a reasonable period of time in accordance with applicable laws and regulations in the PRC and other relevant jurisdictions. Except in exigent circumstances, preservation requests should be sent on law enforcement letterhead, signed, and should include a statement with details about steps that are being taken to obtain legal process for the data sought to be preserved. In specific cases, Voghion may need further supporting and/or legal documentation.

b. Emergency

Emergency requests seek User Information in circumstances involving imminent harm or the risk of death or serious physical injury to a person, which does not allow sufficient time to obtain a subpoena, search warrant, or other equivalent documentation. Voghion reviews emergency requests on a case-by-case basis. All emergency requests must be made by a sworn law enforcement official. Non-law enforcement personnel aware of an emergency situation should immediately and directly contact local law enforcement officials.

c. Legal Process

Voghion may provide User Information in response to a request for voluntary production, subpoena, search warrant, court order, or requests arising from other valid legal processes. Voghion distinguishes between content and non-content information, as defined in Section I.b.

Voghion does not voluntarily produce content information except in response to valid and binding subpoenas or search warrants.

Voghion reserves the right to assist law enforcement agencies in their investigation of any User’s fraudulent and other illegal conduct on Voghion’s platform and may in appropriate circumstances voluntarily provide the relevant non-content information to the law enforcement agencies without a subpoena or search warrant. Voghion may produce all other non-content information in response to a valid, legally binding request, such as a subpoena, search warrant, court order, writ, or other, served on the appropriate contact through proper

process. Where appropriate or necessary, Voghion may require the Requesting Authority to provide the relevant documentation to substantiate the legal basis for the information request.

Voghion reserves its right to object to, in whole or in part, any request that is inappropriate or conflicts with any applicable laws and regulations, in particular the laws of the PRC, and, if necessary, seek an appropriate legal remedy.

III. HOW TO SUBMIT REQUESTS

a. Information to Include in Requests

To facilitate an expedient response with minimal delay, requests from a Requesting Authority should include each of the following documents and information:

- A signed copy of the request;
- Details of the Requesting Authority:
 - The name and location of the Requesting Authority;
 - The requesting official's name, email address from a government domain, telephone number, and physical address; and
 - Credentials for identity verification, such as a badge or ID number;
- Identifying details for the relevant User(s), including but not limited to all known names, aliases, platform usernames, street addresses, email addresses, phone numbers, and any relevant listings, transactions, and URLs;
- Detailed description of the requested User Information, including the relevant timeframe of the offending transactions and type of data requested; and
- Legal basis for the request:
 - Description of the investigations or proceedings, citing the relevant legal provision, which authorizes the request for the User Information;
 - Description of the offense under investigation, including the circumstances of the offense and how it is connected to Voghion;
 - Indication whether User notification would jeopardize the law enforcement activity or other legal process.

Voghion will seek to respond to all requests from a Requesting Authority as soon as possible. In some instances, it may be necessary for Voghion to seek additional or clarifying information before responding to the request. Failing to provide the information described

above or providing an overly broad scope may result in delays in fulfilling the information request. The scope and type of information disclosed may be limited by applicable laws and regulations of the PRC and other relevant jurisdictions. Voghion reserves the right to object to any inappropriate or invalid request and, if necessary, seek an appropriate legal remedy.

b. Service of Requests

Requests must be served through the proper legal and/or diplomatic channels recognized by the PRC, including bi-lateral or multi-lateral legal assistance treaties. Where PRC or other applicable local laws would prohibit Voghion from voluntarily providing requested data located outside the United States, a Requesting Authority in the United States should follow the Agreement on Mutual Legal Assistance in Criminal Matters, which entered into force in 2001. Please refer to the Ministry of Justice of the PRC's website for additional information regarding the PRC's commitments related to legal assistance in criminal matters: <https://www.moj.gov.cn/pub/sfbgw/flfggz/flfggzflty/fltysfxzxgflfg/>.

c. Contact Information

All requests for User Information should be sent to the following email address: patrol@Voghion.com. The email subject line must contain "Law Enforcement Information Request."

Voghion's acceptance of requests sent to the email address is for convenience only. Voghion reserves its rights to raise objections, including for lack of proper service or jurisdiction. Voghion will not respond to requests for User Information from non-law enforcement officials sent through this email address or other informal channels.

IV. USER NOTIFICATION

a. Notification

Voghion respects the rights and privacy of its Users and will generally notify Users before disclosing any information. Subject to PRC and other local laws that may require Voghion to obtain consent from Users prior to producing Personal Information, Voghion will not give notice under the following conditions: (1) such notice is prohibited by applicable law or under the terms of the request, (2) providing notice risks jeopardizing an ongoing investigation, or (3) in the case of emergencies, such as threats to a child's safety or threats to someone's life.

It is the responsibility of the Requesting Authority to request Voghion to not notify a User. Voghion may ask that a Requesting Authority believing that User notification may jeopardize a law enforcement investigation obtain an appropriate court order or follow legal processes that would specifically prohibit notification. Voghion will consider these requests and ensure that all applicable laws and regulations regarding disclosure are followed.

b. Consent

Pursuant to the Personal Information Protection Law of the PRC, Voghion will not disclose any Personal Information located in the PRC unless it obtains informed consent from the data subject. Personal Information is defined in Section I.b.

V. OTHER INFORMATION

a. Cost Reimbursement

Voghion may seek reimbursement for costs, including fees and other expenses, associated with responding to requests for information, particularly if costs incurred are the result of responding to burdensome or unique requests.

b. Additional Questions

Any additional questions or inquiries regarding these Guidelines should be submitted to patrol@Voghion.com.