



新奥能源控股有限公司 ENN Energy Holdings Limited

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 2688)

Cybersecurity and Privacy Protection Policy

Prompt Clause

Your trust is of great importance to us. We deeply understand the significance of your personal information. We will take corresponding security protection measures in accordance with the requirements of laws and regulations, and make every effort to ensure that your personal information is under safe control. In view of this, ENN Energy Holdings Limited (hereinafter referred to as "ENN Energy", together with its subsidiaries, collectively referred to as "we" or "the Company") has developed this "ENN Energy Cybersecurity and Privacy Protection Policy" (hereinafter referred to as "this policy"). The Chief Executive Officer of ENN Energy is responsible for the overall supervision of the Company's cybersecurity and privacy protection work.

This policy applies to all employees of ENN Energy and all our business operations. We encourage our suppliers to comply with the requirements specified in this policy. It should be noted that this policy does not apply to services provided to you by other third parties, nor does it apply to products or services of ENN Energy that have a separately established privacy policy.

This policy has been integrated into ENN Energy's risk management and compliance system. We ensure that all our business operations and activities meet the requirements of this policy. We will regularly evaluate and audit the implementation of this policy to promptly identify and rectify existing problems and risks.

This policy aims to clarify how we collect, use, store, and share your information when you use the products and/or services we operate and in related management, as well as the ways we provide for you to access, update, control, and protect this information. This policy is closely related to your access and use of our products and/or services. Please read and understand this policy carefully. If you have any questions, comments, or suggestions regarding the content of this policy, you can contact us through the ENN Energy customer service hotline 0316 - 259000,

the email address Privacy-Protection@enn.cn, or by mailing the relevant correspondence to the following address: Building A, ENN Science Park, Langfang Economic and Technological Development Zone, Hebei Province.

Part I. Definitions

Affiliated Companies: Refer to all affiliated companies disclosed in the annual report of ENN Energy, a listed company in Hong Kong.

Personal Information: Refers to various types of information recorded electronically or by other means that can identify the identity of a specific natural person either alone or in combination with other information, or that can reflect the activities of a specific natural person.

Sensitive Personal Information: Includes identity document numbers, personal biometric information, bank account numbers, property information, travel trajectories, transaction information, and the personal information of children under 14 years old (inclusive).

Deletion of Personal Information: Refers to the act of removing personal information from the systems involved in fulfilling daily business functions, keeping it in a state where it cannot be retrieved or accessed.

Part II. Information Security Policy

Continuous Investment in Information System Security:

To ensure the security of our information systems, we will continuously invest in the latest security technologies, equipment, and solutions, including but not limited to firewalls, intrusion detection systems, data encryption technologies, and security audit systems. We will regularly evaluate the effectiveness of these investments and make adjustments and optimisations as needed.

Data Integrity and Protection:

We are committed to maintaining the integrity and confidentiality of data. We will adopt appropriate technical and organisational measures to prevent data loss, unauthorised access, modification, or disclosure. We will regularly back up data and ensure the secure storage of backup data.

Monitoring and Responding to Information Security Threats:

We will establish a comprehensive information security monitoring system to monitor network traffic, system logs, and abnormal behaviors in real - time, so as to promptly detect and respond to potential information security threats. We have developed emergency response plans and conduct regular drills to ensure that we can respond quickly and restore systems in the event of a security incident.

Establishing Personal Information Security Responsibilities for All Employees:

We will clarify the information security responsibilities of each employee, including protecting company data and customer information, following security operation procedures, and promptly reporting security vulnerabilities and incidents. We will enhance employees' information security awareness and skill levels through training and publicity.

Applicable Requirements Assigned to Third Parties (such as Suppliers):

We will sign strict contracts with third parties (including suppliers and partners), clearly defining the security standards and requirements they should comply with when handling personal information. We will regularly review the security practices of third parties to ensure that they are in line with our information security policy.

Part III. Privacy Policy

This privacy policy will help you understand the following:

1. How we collect your personal information and the types of data collected
2. How we use your personal information
3. How we use Cookies and similar technologies
4. How we share, transfer, and publicly disclose your personal information
5. How we protect your personal information
6. How you can manage your personal information
7. How we handle the personal information of minors
8. How your personal information is transferred globally
9. Disciplinary actions for violations of this policy
10. How this policy is updated

11. How to contact us

1. How We Collect Your Personal Information and the Types of Data Collected

We collect your personal information in accordance with the principles of legality, rationality, and necessity. When providing you with a specific service, we will clearly inform you of the information to be collected and its purpose. Depending on the services you choose, we may collect one or more of the following types of information in the following scenarios:

A. Browsing Scenario

When you browse our official website (www.ennenergy.com), we will collect your IP address, browser information, operating system, and other service log information, as well as device information. It should be noted that alone, service log information such as IP addresses, browser information, operating systems, and device information cannot identify the identity of a specific natural person. If we combine such non - personal information with other information to identify the identity of a specific natural person, or combine it with personal information, during the period of combined use, such non - personal information will be regarded as personal information. Except when we obtain your authorisation or as otherwise provided by laws and regulations, we will anonymise and de-identify such information.

B. Post and Email Reminder

To improve the convenience of your access to the relevant announcements of ENN Energy as a listed company, you can choose to activate the post and email reminder function (<https://www.ennenergy.com/p1/email.html>), and we will send you relevant announcements regularly or in a timely manner. If you choose to receive relevant announcements, we need to collect your surname, given name, phone number, fax number, email address, affiliated institution, job title, and region/country to send you the announcements. If you no longer wish to receive our announcements after activating the reminder, you can unsubscribe according to the unsubscribe instructions in the announcements or directly contact us to unsubscribe.

C. Contacting Us

When you contact us through the phone number or email address displayed on the network platform, in order to communicate with you and handle your requests, we will collect your contact information (such as phone number or email address) and communication conversation records.

D. Other Service Scenarios

We will collect your personal information through other web pages, apps, WeChat mini-programs, and other online platforms operated by us or our affiliated companies, as well as through offline channels. In such scenarios, we will collect data types as clearly stated in the privacy policies displayed on these online platforms or offline channels during the service - providing process, including but not limited to personal information (such as name, contact information, address, etc.), device information (such as IP address, device model, operating system, etc.), browsing and search records, etc. We will collect and use this information reasonably and legally in accordance with the requirements of laws and regulations and the needs of the service. For example:

- i. When you apply for gas services online through apps or mini - programs such as "ENN 95158 Online Service Hall" and "e - City e - Home", our affiliated companies will collect and process your personal information in accordance with the "*ENN Energy Privacy Protection Policy*".
- ii. When you manage your energy consumption data online through the "ENN Intelligent Energy Usage" app, our affiliated companies will collect and process your personal information in accordance with the "*ENN Intelligent Energy Usage Privacy Policy*".

2. How We Use Your Information

We will collect and use your personal information for the following purposes stated in this policy:

A. Displaying Products and Services

To improve our products or services and provide you with personalised information services, we will extract your browsing and search preferences, behavior habits, location information, and other characteristics based on your browsing and search records, device information, and location information. We will create indirect user profiles based on these characteristic tags and display relevant content.

B. Providing Products or Services

We may use the information collected during the process of providing services to you for the following purposes:

- i. To fulfill our services or functions as agreed in the privacy policy.
- ii. To conduct customer, product, facility, and service surveys.

- iii. To handle your complaints and inquiries regarding ENN Energy's affiliated companies.
- iv. For any matters directly related to the above.

C. Providing Security Assurance

To enhance the security of your use of the services provided by us, our affiliated companies, and our partners, and to protect the personal and property safety of you, other users, or the public from infringement, and to better prevent security risks such as phishing websites, fraud, network vulnerabilities, computer viruses, network attacks, and network intrusions, and to more accurately identify situations that violate laws, regulations, or the relevant gas supply and use agreement rules, we may use or integrate your user information, device information, relevant network logs, and the information shared by our affiliated companies and partners with your authorisation or in accordance with the law. We will comprehensively judge for identity verification, detect and prevent security incidents, and take necessary recording, auditing, analysis, and disposal measures in accordance with the law.

D. Other Purposes

When we use information for purposes not stated in this policy, or when we use information collected for a specific purpose for other purposes, we will obtain your prior consent.

E. Exceptions to Obtaining Authorised Consent

According to relevant laws and regulations, the collection of your personal information in the following situations does not require your authorised consent:

- i. It is necessary for the conclusion or performance of a contract to which you are a party.
- ii. It is necessary for the performance of legal duties or obligations.
- iii. It is necessary to respond to a public health emergency or to protect the life, health, and property safety of natural persons in an emergency.
- iv. It is necessary for news reporting, public opinion supervision, and other acts carried out for the public interest, and the personal information is processed within a reasonable scope.
- v. Personal information that you have publicly disclosed on your own or that has been legally disclosed by others is processed within a reasonable scope in accordance with laws and regulations such as the "Personal Information Protection Law".
- vi. Other situations stipulated by applicable laws and administrative regulations.

If we cease operations, we will promptly stop the activity of collecting your personal information, notify you of the cessation of operations in the form of individual delivery or public announcement, and delete or anonymise the personal information we hold.

3. How We Use Cookies and Similar Technologies

A. Cookies

We may provide services (or products) to you through the website. To ensure the normal and efficient operation of the website, provide you with a more convenient access experience, and recommend content that may interest you, we may store relevant information on your computer or mobile device. This information may include Cookies, Flash Cookies, or other local storage provided by your browser or related applications (collectively referred to as "Cookies"). With the help of Cookies, the client can store data such as your preferences or the products in your shopping cart. Please understand that some of our services can only be achieved by using Cookies. If your browser or browser-added services allow, you can modify your acceptance of Cookies or reject our Cookies. However, rejecting our Cookies may affect your safe access to the website and use of our services in some cases.

B. Web Beacons and Pixel Tags

In addition to Cookies, we also use other similar technologies such as web beacons and pixel tags on the website. For example, the emails we send to you may contain address links to the content of our website. If you click on such a link, we will track this click to help us understand your product or service preferences and improve customer service. A web beacon is usually a transparent image embedded in a website or email. With the help of the pixel tag in an email, we can know whether the email has been opened. If you do not want your activities to be tracked in this way, you can unsubscribe from our mailing list at any time.

4. How We Share, Transfer, and Publicly Disclose Your Personal Information

A. Sharing

We will not share your personal information with other companies, organisations, or individuals, except in the following cases:

- i. Sharing with explicit consent: After obtaining your explicit consent, we will share your personal information with other parties.
- ii. Sharing in legal circumstances: We may share your personal information externally in accordance with the provisions of laws and regulations, for the resolution of litigation disputes, or as required by administrative or judicial organs according to law.
- iii. Sharing with affiliated companies: To facilitate the joint provision of services to you by ENN Energy's affiliated companies, recommend information that may interest you, or protect the personal and property safety of our affiliated companies, other users, or the public from infringement, your personal information may be shared with our affiliated companies. We will only share necessary personal information (for example, to facilitate your use of the products or services of our affiliated companies with your gas account, we will share your necessary account information with affiliated companies). If we share your sensitive personal information or if affiliated companies change the purpose of using and processing personal information, we will obtain your authorisation and consent again.
- iv. Sharing with authorised partners: Only for the purposes stated in this policy, some of our services will be jointly provided by us and authorised partners. We may share some of your personal information with partners to provide better customer service and member experience. We will only share your personal information for legal, legitimate, necessary, specific, and clear purposes, and only share the personal information necessary for providing the service. Our partners have no right to use the shared personal information for purposes unrelated to the products or services.

Currently, our authorised partners include suppliers, service providers, and other partners. We send information to suppliers, service providers, and other partners who support our business. These supports include providing technical infrastructure services, analysing the usage of our services, measuring the effectiveness of advertisements and services, providing customer service, facilitating payments, or conducting academic research and surveys. For the companies, organisations, and individuals with whom we share personal information, we will sign strict data protection agreements, requiring them to use personal information in accordance with our instructions, this privacy policy, and any other relevant confidentiality and security measures.

B. Transfer

We will not transfer your personal information to any company, organiSation, or individual, except in the following cases:

- i. Transfer with explicit consent: After obtaining your explicit consent, we will transfer your personal information to other parties.
- ii. In the event of a merger, acquisition, or bankruptcy liquidation, or other situations involving merger, acquisition, or bankruptcy liquidation, if personal information transfer is involved, we will require the new company or organisation that holds your personal information to be bound by this policy. Otherwise, we will require the company, organisation, or individual to obtain your authorisation and consent again.

C. Public Disclosure

We will only publicly disclose your personal information in the following situations:

- i. With your explicit consent or based on your active choice, we may publicly disclose your personal information.
- ii. If we determine that you have violated laws, regulations, or the terms of this privacy policy, or to protect the personal and property safety of our affiliated companies' users or the public from infringement, we may disclose your personal information in accordance with laws, regulations, or with your consent obtained in accordance with the terms of this privacy policy, including relevant default behaviors and the measures taken by ENN Energy against you.

D. Exceptions to Obtaining Prior Authorised Consent for Sharing, Transferring, and Publicly Disclosing Personal Information

The sharing, transfer, and public disclosure of your personal information in the following situations do not require your prior authorised consent:

- i. Related to national security and national defense security.
- ii. Related to public security, public health, and major public interests.
- iii. Related to criminal investigation, prosecution, trial, and judgment enforcement.
- iv. To protect the major legal rights and interests such as the life and property of you or other individuals, but it is difficult to obtain the consent of the individual.
- v. Personal information that you have publicly disclosed to the public.
- vi. Personal information collected from legally publicly disclosed information, such as legal news reports and government information disclosures.

According to the law, the sharing and transfer of de-identified personal information, and ensuring that the data recipient cannot restore and re-identify the personal information subject, do not belong to the external sharing, transfer, and public disclosure of personal information. The storage and processing of such data do not require separate notice to you and your consent.

5. How We Protect Your Personal Information Security

We have implemented security protection measures that are in line with industry standards and reasonably feasible to safeguard the security of the personal information you provide. These measures aim to prevent personal information from being accessed without authorisation, publicly disclosed, used, modified, damaged, or lost. We use encryption technologies to enhance the security of personal information; we employ trusted protection mechanisms to prevent malicious attacks on personal information; we deploy access control mechanisms to ensure that only authorised personnel can access personal information; and we conduct security and privacy protection training courses to strengthen employees' awareness of the importance of protecting personal information.

We will take reasonable and feasible measures to avoid collecting irrelevant personal information as much as possible. At the same time, we will store your personal information in accordance with the principle of minimum necessity. We determine the retention period of the information as follows:

- i. Store the information within the period necessary to achieve the purposes described in this policy;
- ii. Store your personal information within the period specified by laws and regulations. For example, in accordance with the Cybersecurity Law of the People's Republic of China, network logs shall be retained for at least six months.

After the storage period expires, we will delete or anonymise the above-mentioned personal information.

The Internet is not an absolutely secure environment. We strongly recommend that you use the email address or message window communication method published on our website to send personal information. You can establish contacts and share information with others through our services. When you create communication or sharing through our services, you can choose the communication or sharing objects on your own. These third parties will be able to see your contact information, communication information, or shared content and other related information.

Please note that the information you voluntarily share or even publicly disclose when using our services may involve your or others' personal information, and even sensitive personal

information. Please consider more carefully whether to share or even publicly disclose relevant information when using our services.

We will do our best to ensure the security of any information you send to us. If our physical, technical, or administrative protection facilities are compromised, resulting in unauthorised access, public disclosure, tampering, or destruction of information, and causing damage to your legitimate rights and interests, we will assume the corresponding legal responsibilities.

In the unfortunate event of a personal information security incident, we will inform you in accordance with the requirements of laws and regulations: the basic situation of the security incident and its possible impact, the disposal measures we have taken or will take, suggestions for you to independently prevent and reduce risks, and remedies for you, etc. We will inform you of the relevant situation of the incident by means of email, letter, telephone, etc. When it is difficult to inform each individual information subject one by one, we will issue announcements in a reasonable and effective manner. At the same time, we will also report the handling situation of the personal information security incident in accordance with the requirements of the regulatory authorities.

6. How Do You Manage Your Personal Information?

You can access and manage your personal information in the following ways:

A. Access Your Personal Information

You have the right to access your personal information, except in cases where otherwise provided by laws and regulations. You can access your personal information by yourself through the background system of this website and the websites of ENN Energy's affiliated enterprises. If you are unable to access your personal information through the above channels, you can contact us by telephone published on this website.

B. Correct or Supplement Your Personal Information

When you find that the personal information we process about you is incorrect, you have the right to request us to make corrections or supplements. You can submit a correction or supplement application through the methods listed in "A. Access Your Personal Information".

C. Delete Your Personal Information

You can delete some of your personal information through the methods listed in "A. Access Your Personal Information". In the following situations, you can submit a request to us to delete your personal information:

- i. If our processing of personal information violates laws and regulations;
- ii. If we collect and use your personal information without your explicit consent;
- iii. If our processing of personal information seriously violates the agreement with you;
- iv. If you no longer use our products or services;
- v. If we permanently stop providing products or services to you.

If we decide to respond to your deletion request, we will also, to the extent possible, notify the entities that have obtained your personal information from us and request them to delete it in a timely manner, unless otherwise provided by laws and regulations, or these entities have obtained your independent authorisation.

When you delete information from our services, we may not immediately delete the corresponding information from the backup system, but we will delete this information when the backup is updated.

D. Change the Scope of Your Authorised Consent

Each business function may require some basic personal information to be completed (see item (1) of Part III of this policy). In addition, for the collection and use of additional personal information, you can contact ENN Energy by telephone published on this website to give or withdraw your authorised consent.

When you withdraw your consent, we will no longer process the corresponding personal information. However, your decision to withdraw your consent will not affect the personal information processing carried out based on your previous authorisation.

E. Restrain Automatic Decision-making by Information Systems

In some business functions, we may make decisions based solely on non-manual automatic decision-making mechanisms such as information systems and algorithms. If these decisions significantly affect your legitimate rights and interests, you have the right to request us to provide an explanation, and we will also provide an appeal method on the premise of not infringing on the trade secrets of ENN Energy or the rights and interests of other users and the public interest.

F. Respond to Your Above Requests

To ensure security, you may be required to submit a written request or prove your identity in other ways. We may first ask you to verify your identity before processing your request.

We will respond to your reasonable requests within 15 days. If you are not satisfied, you can also file a complaint with ENN Energy through the email address or telephone number published on this website.

For requests that are gratuitously repetitive, require excessive technical means (for example, require the development of a new system or a fundamental change to the existing practice), pose risks to the legitimate rights and interests of others, or are extremely impractical, we may reject them.

In the following situations, in accordance with the requirements of laws and regulations, we will not be able to respond to your requests:

- i. Related to national security and national defense security;
- ii. Related to public safety, public health, and major public interests;
- iii. Related to criminal investigation, prosecution, trial, and execution of judgments, etc.;
- iv. There is sufficient evidence to show that the personal information subject has subjective malice or abuses their rights;
- v. Responding to your request will cause serious harm to the legitimate rights and interests of you or other individuals and organisations;
- vi. Involving trade secrets.

7. How Do We Handle the Personal Information of Minors?

Minors are not allowed to create their own member accounts without the consent of their parents or guardians. If you are a minor, it is recommended that you ask your parents or guardians to read this policy carefully and use our services or provide information to us with the consent of your parents or guardians.

In the case of collecting the personal information of minors with the consent of their parents or guardians for the use of our products or services, we will only use, share, transfer, or disclose this information when it is permitted by laws and regulations, when the explicit consent of the parents or guardians is obtained, or when it is necessary to protect the minors.

8. How Is Your Personal Information Transferred Globally?

The personal information collected and generated during our operations within the People's Republic of China is stored within China, except in the following situations:

- i. As clearly specified by laws and regulations;
- ii. With your explicit authorisation.

For the above situations, we will ensure that your personal information is provided with sufficient protection in accordance with this privacy policy, and we will perform administrative procedures such as security assessment, filing, and certification in accordance with the applicable laws and regulations.

9. Disciplinary Actions for Violations of This Policy

We will take strict disciplinary actions against behaviors that violate this policy, including but not limited to warnings, fines, dismissal, etc. We will implement a zero-tolerance policy and will investigate and hold accountable any behavior of disclosing users' privacy information in accordance with the law and severely crack down on such behavior.

10. How Will This Policy Be Updated

We will annually review and update this policy to ensure that it complies with the requirements of laws and regulations and the actual needs of the Company's operations. Without your explicit consent, we will not restrict your rights as described in this policy. We will publish any changes made to the network security and privacy protection policy on a dedicated page.

For major changes, we will also provide more prominent notifications (including soliciting opinions through the publicity method of ENN Energy, issuing public announcements, and even providing pop-up prompts to you).

The major changes referred to in this policy include but are not limited to:

- i. Significant changes occur in our service model. For example, the purpose of processing personal information, the types of personal information processed, the way of using personal information, etc.;
- ii. Significant changes occur in our control rights, etc. For example, changes in ownership caused by mergers and acquisitions, etc.;

- iii. The main objects of personal information sharing, transfer, or public disclosure change;
- iv. Significant changes occur in your rights in participating in personal information processing and the way of exercising these rights;
- v. When the department responsible for handling personal information security, the contact method, and the complaint channel change;
- vi. When the personal information security impact assessment report indicates the existence of high risks.

11. How to Contact Us

You can contact us in the following ways, and we ensure that these channels are unobstructed and will reply to your requests within 15 days:

- i. If you have any questions, comments, or suggestions regarding the content of this policy, or if you have any concerns about your data privacy, you can contact us through the email address (PrivacyProtection@enn.cn) and telephone number (0316-259000) published on this website, or send relevant correspondence to the following address: Building A, ENN Science and Technology Park, Economic and Technological Development Zone, Langfang City, Hebei Province.
- ii. If you find that your personal information may have been leaked, you can file a complaint through the email address, message window, and telephone number published on this website.

Part III Supplementary Provisions

This policy was revised and took effect in March 2025. ENN Energy Holdings Limited is responsible for the explanation of any matters not covered. We will continuously improve and update this policy in accordance with the requirements of laws and regulations and the actual needs of the Company's operations to better protect the network security and privacy of users.

Update Date: March 19, 2025