DATA DETELTION POLICY

<u>**Policy Statement**</u>
Fano Labs Limited (the "Company") is committed to protecting the privacy and security of our clients' data. This Data Deletion Policy outlines the procedures and guidelines for the secure and complete deletion of client data upon their request.

<u>**Objectives**</u>
The goal of this policy is to ensure that all client data is handled in accordance with applicable compliance.

<u>**Procedures**</u>
Clients can initiate data deletion by submitting a written request to <u>support@fano.ai</u>. To ensure accurate identification of the data, clients must include the following information in the written request:

- the specific types of data subject to deletion; and
- any necessary details that can assist in identifying the designated data

Upon receipt of the written request, the Company will acknowledge receipt within 5 working days and commence the deletion process within 10 working days.

To maintain the security and integrity of sensitive data, the Company may conduct verification or authentication procedures to confirm the identity and authority of the requesting party. These measures aim to protect against unauthorized data deletion.

Unless specified otherwise by Hong Kong compliance regulations regarding data retention requirements, our DevOps team will adhere to established procedures to facilitate the secure and permanent deletion of client data from our systems and environments. The selected deletion techniques will depend on the nature of the data and relevant compliance standards. These techniques may include:

- Secure Erasure
- Physical Destruction
- Data Anonymization
- Log and Audit Trail Deletion

Upon successful deletion, clients will receive a confirmation email providing applicable proof of data deletion.

The Company will also maintain certain data deletion records for the purposes of auditing and compliance.

Version 2 (Effective from 1 November 2023)

Exceptions

This policy may not apply under the certain exceptional cases, which may arise due to legal obligations, regulatory requirements, contractual agreements, or other circumstances that necessitate deviation from the standard procedure. Such exceptions will be handled and on a case-by-case basis, ensuring compliance with applicable laws and regulations. Any exceptions to the data deletion procedure will be clearly documented and approved by VP of Engineering.

Responsibilities

General Responsibility:

- All employees of the Company are required to comply with this policy regarding data deletion. Any activities that do not align with this policy should be promptly reported.

Team and Department Heads:

- Team and department heads hold the responsibility of ensuring that their teammates are familiar with the scope and implications of this policy. They should communicate and enforce the policy with their respective teams.

F&A Team:

- The F&A team is responsible for overseeing policy compliance. They must ensure that each employee acknowledged the policy.

Policy Ownership:

- The ownership of this policy resides with the VP of Engineering, who is responsible for its maintenance, updates and overall adherence. Any inquiries or questions regarding this policy should be directed to the F&A team via hr@fano.ai.

Regular Review

HR Director is responsible for keeping this policy current. This policy will be reviewed annually or as circumstances arise.

The DevOps team is responsible for data deletion measures. These data deletion measures will be reviewed annually or as circumstances arise.

Version 2 (Effective from 1 November 2023)