



CASL PRIVACY POLICY

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Thank you for visiting our website <https://caslinvest.com> ("Website"). This Privacy Policy ("Policy") sets out the basis on which any Personal Data collected from you, or that you provide to us, will be processed by CASL LLC ("CASL", "us", "we", "our").

This Privacy Policy together with our Terms of Use and any additional provisions that may be incorporated there apply to your use of our Website ("Platform") and any of the Services accessible through the Website.

Please read the following Policy carefully and make sure you understand what Personal Data ("Data") we collect, how this Data is stored/used and which way it may be shared by Us.

If you have any questions about this Policy, or any concerns about how we treat your Data, you can reach CASL directly via feedback@caslinvest.com or contact our Data Protection Officer j.grows@caslinvest.com

You hereby acknowledge and agree that we cannot guarantee that any losses or unauthorized access to your Data will not occur.

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY IN GENERAL OR IN ANY PART, YOU SHOULD NOT USE OUR WEBSITE AND OUR SERVICES.

1. WHAT PERSONAL DATA WE COLLECT

a) When you access to our Website we may collect the following Data automatically:

- Internet Protocol (IP) address, OS;
- Browser, device information (device ID, hardware model, etc.);
- Country, location, language, GPS;
- Time of access to Website, clickstream data, time stamps, page response time, occurring errors, duration of visits to pages;

- Services you searched/viewed, information about the relationship of pages (scrolling, clicks and mouse hovering), page interaction information;
- Google Analytics;
- Cookies;
- Geolocation data;
- Other technical info that does not reveal your identity.

b) When you link your digital wallet ("Wallet") on the Website, in addition to Data shown in clause "a" we may collect:

- Public blockchain data;
- Wallet type and identification data;
- Transactions data;
- Stored smart contracts data;
- Other information which may become available to Us directly or through third party Services.

c) When you sign up for a contract, we may collect the following Data:

- In case you register via social network accounts - social network accounts data, including full name, home address, email address, birthdate, profile picture, friends list, personal description, as well as any other information made publicly available;
- In case you register through the application or the website – full name, email address, home address, hometown, nationality, birth date, phone number, information required for Know Your Customer checks, such as passport, identification number and any other relevant information.

For the avoidance of doubt, if we combine Personal Data with non-personal data, the combined information will be treated as Personal Data as long as it remains combined.

In addition, we may collect Personal data from different sources, such as: our affiliates, our service providers, or our affiliates' service providers; public websites or other publicly accessible directories and sources, including bankruptcy registers, tax authorities, governmental agencies

and departments, and regulatory authorities; and/or from credit reporting agencies, sanctions screening databases, or from sources designed to detect and prevent fraud or financial crimes. The relevant source may be responsible for obtaining the relevant consents from you (where applicable) to ensure you are happy with the ways in which your Personal data will be used.

2. HOW WE USE YOUR PERSONAL DATA

Your Data may be used by Us for various purposes including, but not limited to:

- To provide you timely and full access to our Services;
- To fulfill our contract obligations;
- To prevent unlawful activity and to protect your interests. Although, CASL is not liable to provide any security services we do our best to detect and prevent damage to our Users;
- To comply with applicable laws and regulatory requirements related to protection of Personal Data;
- To provide you technical support. We may use your Data to send you administrative information about changes to our terms, conditions and policies;
- To be able to receive feedback from you and update you with latest information about our Platform/Services;
- To carry out verification activities;
- For business purposes and marketing.

3. HOW WE PROTECT YOUR PERSONAL DATA

We will do our best to protect your Data from unauthorized access with our system of organizational and technical security measures. These security measures fully comply with applicable laws and meet the highest standards in Data protection sphere. However, despite mentioned above facts it is impossible to achieve complete security of your Data.

You hereby acknowledge and agree that CASL will not:

- a) be liable for any loss or damage which may occur due to unauthorized access to your Data;

- b) hold any responsibility for any actions committed by any service providers or any other third parties;
- c) be liable for any leak of Data and any loss or damage it may cause.

4. HOW LONG DO WE KEEP YOUR PERSONAL DATA

We will only keep your Personal Data in an identifiable format for the least amount of time necessary to fulfill our legal/regulatory obligations and for our business purposes. We may retain your Data for longer periods than required by law if it is in our legitimate business interests and is not directly prohibited by the applicable law. When Personal Data is no longer necessary for the purpose for which it was collected, we will remove any details that identifies you or we will securely destroy the records, where permissible. However, we may need to maintain records for a significant period of time (even after you cease using our Services) if it will be required by law (tax, accounting, other legal purposes).

5. COOKIES

We may log information using «cookies». When you visit the Website, we invite you to read and accept our use of cookies. By accepting the banner and continuing to use the Website, you agree to the placement of cookies in your browser in accordance with this Policy. A cookie is a small text file that is stored on your computer to help us make your visit to our Website more convenient. Cookies provide us with information about your use of the Website that can help us to improve it. We will process Personal Data collected through cookies in accordance with this Privacy Policy. You may refuse cookies by turning them off in your browser, however, you should be aware that our Website, like most other sites, may not work well with cookies disabled.

We use the following Cookies:

- a) Strictly necessary Cookies. These are Cookies that are required for the operation of our Website.
- b) Analytical Cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works.
- c) Targeting Cookies. These Cookies record your visit to our Website, the pages you have visited and the links you have followed. We may also share this information with third parties for this purpose.

6. THIRD PARTY SERVICES

The Website may include links to third party resources which we have no control of. The fact that such information is displayed on the Website does not mean that CASL approves content provided on such websites or is in any way related to it.

These links provided for your convenience only, once you follow the link and leave the Website you will be no longer governed by this Policy, and you should refer to third party website Privacy Policy.

7. PERSONAL DATA TRANSFER

To ensure the most effective and seamless delivery of the Services, CASL reserve a right to process, store, analyze, transfer your Data in different locations, including countries other than your home jurisdiction where the data protection laws may differ and be not so protective. CASL is a company registered in Saint Vincent and Grenadines and will take all necessary preparations to ensure that your Data is protected and treated in accordance with this Privacy Policy. Your consent to this Privacy Policy followed by your submission or our collection of such Personal Data represents your agreement to such transfer.

8. DISCLOSURE OF YOUR PERSONAL DATA

You hereby acknowledge and agree that CASL have the right to disclose and share your Data with any person/in any circumstances defined below:

- a) Third Party Service Providers, if it is necessary to supply Services you have requested, or to provide additional technical and customer support; and/or to provide other support to us and to the Services;
- b) If CASL will be involved in a business transition or any merger projects, Data might be transferred to a new company. Such company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Policy.
- c) We may share your Personal data with law enforcement, and government officials when we are compelled to do so: (i) by a subpoena, (ii) a court order to prevent financial loss, (iii) to report suspected illegal activity, (iv) in connection with any legal investigation, (v) to comply with relevant laws or to respond to subpoenas, warrants, or other legal process served on the Website, (vi) to protect or defend the rights or property of CASL or users of the Service, (vii) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Service.

- d) If it is necessary to fulfill the purpose for which you provided Data, or with your prior consent.

9. PERSONAL DATA ACCESS AND CONTROL

EU/UK Based Users and the GDPR

If you are an EU or UK data subject and the processing of your Personal data is subject to the GDPR, please review this section in addition to the entire Policy.

(I) Grounds for Processing

We will only process your Personal data in circumstances where we have established a lawful basis to do so. Our lawful bases for processing that Personal data include:

Legitimate Interests. We process Personal data for our legitimate business interest in managing and promoting our business, provided that our interest is not overridden by your interest. In identifying and relying on this basis for certain processing, we have weighed our legitimate interest as a business against your rights and freedoms and have determined that such processing will not unfairly impact your rights. If you would like further information on how we balanced these interests, you can contact us using the details below. Please note that you have a right to object to the processing of your Personal data where that processing is carried on for our legitimate interest.

Legal Requirements. We may need to process your Personal data in order to comply with certain legal and regulatory requirements, including to establish, exercise or defend legal claims, respond to a judicial process, law enforcement or governmental agency.

Contract. Depending on the circumstances, we may need to process your Personal data for the performance of a contract to which you are a party, or related pre-contractual steps.

Consent. We may process your Personal data with your consent, as required by the GDPR. You have the right to withdraw this consent at any time where we are relying on consent to process your Personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

(II) Your Rights under the GDPR

We respect your privacy rights and therefore you may contact us at any time and request:

- Access. You have the right to know we collect certain Personal data about you and to ask us for copies of your Personal data. Please use the contact details provided at the end of this Policy.
- Rectification. You have the right to request that we correct your Personal data you think is inaccurate or incomplete.
- Objection to processing. You have the right to object to processing in some circumstances, including where we are using your Personal data for our legitimate interests and for direct marketing purposes, including by opting-out of marketing communications by contacting us using the contact details provided at the end of this Policy.
- Erasure. You have the right to request that we erase the Personal data we have collected about you in certain circumstances. The right to erasure is not absolute, and only applies if we no longer need your Personal data to carry out the purpose that we collected it for, whilst in compliance with laws applicable to us; you have withdrawn your consent to our use of your Personal data; you have objected to our use of your Personal data and your interests outweigh our interests in using it; you believe we have processed your Personal data unlawfully; or we have a legal obligation to erase your data. Subject to our retention policies, we will consider any request to erase Personal data for any of the above reasons and endeavor to comply with the request to the extent permitted by law, but we may not always be able to comply with your request. We may be required to retain the Personal data for certain retention periods in order to comply with legal and regulatory requirements under applicable laws and regulations to which we are subject. If we are unable to comply with your request, we will contact you in writing. If you wish to exercise this right, please contact us at: feedback@caslinvest.com.
- Restrict processing. You have the right to ask us to restrict the processing of your Personal data in certain circumstances, including if you have concerns regarding the accuracy of your Personal data, where you have made an objection to our use of your personal data; or if you believe we processed your Personal data unlawfully, but you do not want us to delete it.
- Data portability. You have the right to receive a copy of the Personal data that we collect about you in a way that is accessible and in a machine-readable format where the processing is based on your consent, the performance of a contract with you, or carried out by automated means. You have the right to request that such Personal data be transmitted directly from us to another data controller, where technically feasible.
- Withdrawal of consent. You can withdraw your consent at any time where we are relying on consent to process your Personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

We will store your Personal data only for as long as necessary for the purposes for which it was collected, including to provide the Services and to comply with our legal obligations, resolve disputes and enforce our policies and agreements. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client Personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion. If you wish to make a complaint regarding our handling of your Personal data, you can contact us at feedback@caslinvest.com. You may also make a complaint to the relevant supervisory authority for data protection issues. In the UK this is the Information Commissioner's Office ("ICO"). Contact details for the ICO may be found at www.ico.org.uk.

(III) Transfer of Information Outside the UK and/or the EEA

Please note that some data recipients may be located outside the EEA and/or the UK. In such cases we will seek to ensure a similar degree of protection is afforded to it by ensuring that, where possible, Personal data is generally transferred only to persons in countries outside the EU or the UK in one of the following circumstances:

- transfers only to such countries as approved by the European Commission or the equivalent entity in the UK as providing adequate level of data protection;
- to persons and undertakings to whom the transfer of such Personal data is made pursuant to a contract that is compliant with the model contracts for the transfer of Personal data to third countries from time to time approved by the European Commission (as supplemented where and if required) or the equivalent body in the UK;
- to persons and undertakings outside of the EU or the UK pursuant to other appropriate safeguards for the transfer of Personal data; and
- only on one of the conditions allowed under the GDPR in the absence of (i) a decision by the European Commission or the equivalent entity in the UK that has deemed a country to provide an adequate level of protection for Personal data (i.e. an adequacy decision) or (ii) appropriate safeguards such as a contract that is compliant with the model contracts for the transfer of Personal data to third countries approved by the European Commission or the equivalent entity in the UK.

You can contact us through the information provided below for further information on specific mechanisms we utilise for transferring Personal

data outside the EU or the UK and the countries to which such transfer may be made.

10. LIMITATION

CASL Website and Services are not directed to individuals who:

- are under 18 years or old or under legal age established under applicable laws of country where person is using our Services; or
- are residents or citizens of the following countries: United States of America, Democratic People's Republic of Korea, Republic of Iraq, Republic of the Sudan.

You are not allowed to provide us any Data or in any way interact with our Services if you have not attained required age. If we will find out that you achieved unauthorized access to our Platform/Services we will delete your Data and block your access to our Platform/Services.

11. CHANGES TO THE PRIVACY POLICY

We reserve the right to update this Privacy Policy in our sole discretion from time to time. We will leave mark "Last revised" at the beginning of document. If you do not agree, fully or partially to the revised version of Privacy Policy, you shall not access to our Website or Services, by continuing using our Website or Services you agree to be bound by this Privacy Policy, as modified by such update.

12. NAME AND ADDRESS OF THE CONTROLLER

CASL is the controller and responsible for your Personal Data.

Name: CASL LLC

Postal address: Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, St. Vincent and Grenadines

Company Registry Code: 2558 LLC 2022

Email: feedback@caslinvest.com

Email of data privacy officer: j.grows@caslinvest.com