

[Last updated on \_\_\_\_\_]

## **PRIVACY POLICY**

**This privacy policy (the “Privacy Policy”) explains how we collect, use, share, and safeguard personal information. This Privacy Policy also tells you about your rights, and how you can reach us if you have any concerns or questions with respect to your personal information.**

**“Personal information” will include all and any information which, either alone or in combination with other data enable you to be identified. For example, your name, email address, username, contact details or any unique identifier such as an IP address, device ID or other online identifier.**

Any of the terms that is not defined in this Privacy Policy will have the meaning given to it in the terms and condition for use of the Services (“**T&C**”). Please refer to the T&C before accessing any Services available on our Platform.

### **1. Type of Information we collect**

- 1.1 We collect and process certain data/information of, and from the user for duly legitimate purpose on a valid legal basis for provision of the Services and maintenance of the Platform, among others, its operation, improvement and to diagnose its problems.
- 1.2 Some of this data is collected automatically, when a user or a visitor uses the Platform and/or the Services, such as login information, device information, activities, location and those collected by cookies. We also collect information when you create an Account, participate in any interactive features of the Services, fill out a form, participate in a contest or promotion, make a purchase, communicate with us via third party social media sites, request customer support, or otherwise communicate with us. This includes your name, email address, telephone number etc. You may provide this information to us directly, or by signing in to your account/service with a third party, including without limitation, Facebook or Google. In addition, the Company for the provision of Services and compliance with Law, could also request for additional data including, your gender, date of birth, place of birth, addresses, nationality, national insurance number, social security number citizenship and residency status, trading history, and other details, as may be required from time to time.

- 1.3 We have provided below examples of the type of information that we may collect from you, and purpose of collecting such information.

<b>Nature</b>	<b>Type of data</b>	<b>Legitimate Interest</b>
<b>Account Registration</b>	We collect your name and contact information when you create an account.	We use this information to provide account related functionalities to our users. Also, to confirm user' identify, prevent fraud and compliance with legal obligation.
<b>Demographic Information</b>	We may collect personal information, such as your age, location, and gender.	We use this information to comply with applicable Law.
<b>Client Information</b>	We collect the name, and contact information, of our clients and their employees with whom we may interact.	To contact clients and communicate with them for business administration such as projects, services, and billing.
<b>Support Information</b>	When you contact us for technical and customer support requests, we collect the information shared with us, including any follow-up interactions we have with you.	Your consent and our legitimate interests in assisting the users on issues relating to the Services.
<b>Survey Information</b>	We may from time to time invite you to participate in surveys about your experience using the Platform. If you agree to participate in a survey, we collect the information included in your answers to the survey.	Your consent and our legitimate interest in developing and enhancing the Services.

<b>Device Information</b>	Usage Data, i.e., Internet Protocol address, browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.	Performance of analytic operation in order to improve the Services.
<b>Cookies</b>	Various browsing information of user resulting from use of Cookies.	We use this information to ensure our website operates efficiently, and where required by Law, we base the use of cookies upon consent.
<b>Third Party Information</b>	We may receive personal information about you from third parties including business partners, our Affiliates, or publicly available sources. Example, user KYC verification through third party or background check of employee to ensure compliance with Law.	For the provision of the Services, compliance with Law and to further develop and enhance the Platform.
<b>Transaction Information</b>	When you connect your wallet to our Platform/Services we will collect information on all transactions connected to your public key through our Platform.	To prevent fraud, compliance with legal obligation, and our legitimate interest in developing and enhancing the Services.

## 2. DATA SUBJECT'S RIGHTS AND DUTIES

2.1 **Right of the Data Subject:** As a data subject, you have certain rights with respect to your personal information, such as:

- **Right to Consent:** You have the right not to consent/provide us any such data, however, if you do so, we may not be able to provide you with the Services, or the products and/or Services offered through the Platform.
- **Access:** You have the right to request details of your personal information from us.
- **Data Erasure.** You can request for deletion of your personal information. However, if such data is required for the provision of the Services, you may be required to delete your Account and/or may not be able to use our Services.
- **Correction:** If you believe any personal information held by us is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us to correct such information, or update the same via your Account, if allowed.
- **Concerns and Queries:** If you want to exercise your rights or have any concerns and queries on how we process, handle, and keep your personal information, please make a request to us accompanied by a proof of identity and full details of your concerns and queries. We will take appropriate steps to address them.
- **Unsubscribe:** To unsubscribe from our e-mail or to opt-out of any communications, please contact us at the address provided on the Platform or where available, use opt-out option.
- **Anonymity:** We will allow you the option of not identifying yourself or using a pseudonym, where practicable.

2.2 **Data Security:** We will use appropriate security measures (organizational and technical) to prevent your personal information from being accidentally lost, used, damaged, or accessed in an unauthorised or unlawful way, altered, or disclosed. Unfortunately, the transmission of information via the Internet is not completely secure, and despite implementing appropriate security measures, we cannot guarantee that the personal information we collect will not be shared/disclosed in a way that is inconsistent with this Privacy Policy. We cannot guarantee the security of your data transmitted to us over the email or through the Platform, and any such transmission is at your own risk. Further, where we need to use or share your personal

information, we will allow access to your personal information only to those employees, agents, contractors and other third parties who have a legitimate business need to know and are subject to a duty of confidentiality.

- 2.3 **Anonymized Info:** The Company may also aggregate Anonymized Info, i.e., personal and other data such that the data is no longer capable of identifying an individual. We reserve the right to use this Anonymized Info for the purposes of improving and enhancing our Services, generating insights, and otherwise for the purposes of our business. Provided that such aggregated data does not directly or indirectly identify you as an individual, this data is not considered to be personal information and not covered by this Privacy Statement.
- 2.4 **Duty:** It is important that the personal information that we collect from you is accurate and current. Please update your personal information when such information changes by using the Services available on the Platform. If you do not wish for your personal information to be used in the ways described within this Policy then you should not use the Services, the Platform, functions, or features offered by us. You are under no obligation to provide the requested personal information. However, if we need information from you to offer our Services or meet any of our legal or regulatory requirements, failure to provide such information will mean that you will not get access to the Services.
- 2.5 **Right to disclose Personal Information:** You represent and warrant that when you disclose personal information to the us you have the legal right to disclose such data to us and such data is true and correct, and when such information includes personal information of other natural person, such person has been provided with this Privacy Policy and, to the extent applicable, have consented to the processing of their data.
- 2.6 **Minor:** As provided in our T&C, our Service is not intended for anyone under the age of 18 or minor under the law of the country where the Services are accessed ("**Minor**"). We do not intend to or knowingly collect any personal information related to a Minor. If you believe that personal information of any Minor has been collected or provided to us, please contact us.

### 3. **CONSENT OF USER**

- 3.1 **Consent:** By accessing our Platform and/or using our Services you agree to allow us to collect, hold, use, and disclose your data in accordance with this Privacy Policy.

3.2 **Consent for Third Party Disclosure:** Without prejudice to the above, for the provision of the Services and for fulfilling the purposes specified in this Privacy Policy, you understand and accept that we may disclose your personal information to:

- third party service providers for provision of the Services, including data storage, webhosting and server providers, debt collectors, professional advisors and payment systems operators,
- our employees, contractors and/or related entities,
- our existing or potential agents or business partners,
- anyone to whom our business or assets are, or may be, transferred,
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for the Services,
- courts, tribunals, regulatory authorities and law enforcement officers, as required by Law, or in order to establish, exercise or defend our legal rights,
- third parties, including agents or sub-contractors, who assist us in providing information, products, services or direct marketing to you,
- third parties to collect and process data, such as Google Analytics or other relevant businesses,
- operate and maintain the security or integrity of the Services, including to prevent or stop an attack on our computer systems or networks,
- protect the rights, interests, or property of our or third parties,
- prevent or investigate possible wrongdoing in connection with the Services, or
- enforce our T&C.

3.3 **Cookies:** The Company uses cookies to provide necessary website functionality, improve your experience and analyze the traffic on the Platform ("**Cookies**"). When you browse the Service for the first time, a Cookie banner will be displayed requesting you to accept, refuse or configure Cookies. You will have the option to accept, refuse and delete certain or all Cookies. However, please be informed that the refusal of certain Cookies may affect the delivery of the Service provided and your navigation of the Platform. We may use the following Cookies:

- **Functional Cookies:** We use functional cookies to recognize you when you return to our Platform.
- **Analytics and Performance Cookies.** We use analytics and performance cookies for website analytics purposes to operate,

maintain, and improve the Platform and the Services. The information gathered by these cookies is aggregated and anonymized and does not identify any specific individual visitor.

- **Advertising Cookies.** We may allow third-party advertising partners to use cookies on the Platform to collect information about your browsing activities over time and across websites.

#### **4. DATA RETENTION AND TRANSFER**

4.1 **Data Retention:** The Company will retain the Personal Information for a limited duration, not exceeding the time required for fulfilment of purposes described in this Privacy Policy. Further, we may retain personal information for an additional period permitted or required under applicable Laws, for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes.

4.2 **Data Transfer:** The personal information collected by us may be stored and processed in Panama or in any other country where we or our Affiliates or service providers maintain facilities. If we decide to transfer your data to other countries, we will take all commercially reasonable steps required to ensure that the data is stored, processed, and used in accordance to the provisions of this Policy, and the requirements of applicable Law wherever the data is located. Further, no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

**Your consent to this Privacy Policy represents your agreement to the above-mentioned transfers.**

#### **5. LINKS TO OTHER SITES AND THIRD-PARTY SERVICE PROVIDER**

5.1 The Platform may contain links to other websites. Those websites are not governed by this Privacy Policy. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. Please read the privacy policy and terms and conditions of such websites before using such websites. We have no control over and shall not be responsible for the content, privacy policies or practices of any third-party sites or services.

5.2 If you elect to use our applications provided via social networks, such as Facebook, Twitter, etc., our application will be granted access to your social

network account general information which includes your name and username in the social network, profile picture, gender, networks, user ID, list of friends, and any other information you have permitted to be shared depending on the settings you establish with the entity that provides the social sharing feature. For more information, please visit the privacy policies of the social network entities that provide these features.

## **6. MISCELLANEOUS**

- 6.1 **Modification:** We reserve the right to update this Privacy Policy at any time and at our sole discretion. Any changes to or modifications of this Privacy Policy shall be in effect as of the “Last Updated Date” referred to at the top of this page. We will notify you of such change prominently either by posting a notice of such changes before they take effect, or by sending you a notification directly. The amended Privacy Policy is effective once we notify you of the change. We encourage you to periodically review this Privacy Policy.
- 6.2 **Contact Details:** For queries on any aspect of this Privacy Policy or to provide any feedback please contact us at the address provided under the “Contact Us” on the Platform.
- 6.3 **Cookies Update:** To update your cookie preferences, visit the [“Cookie Consent Manager”](#).
- 6.4 **Accessibility:** If you are visually impaired, you may access this notice through your browser’s audio reader.