

Privacy Policy

1. Introduction

Welcome to BEC Ltd.

As part of our mission to provide accessible investment opportunities to people around the globe, BEC Ltd. and its affiliates collect and process a lot of information. This Privacy Policy is intended to help you better understand how we collect, use and store your personal information as an end user that uses BEC Ltd.'s products, applications or services (together, the "Services"), or whether you're simply visiting this website. By using any of BEC Ltd.'s Services, or by dealing with a merchant using BEC Ltd.'s Services, you are agreeing to the terms of this Privacy Policy and, as applicable, the BEC Ltd. Terms of Service.

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our privacy practices or for other operational, legal, or regulatory reasons. If we make material changes to this Privacy Policy, we will give you notice of such changes by posting the revised policy on this Website, and where appropriate, by other means. By continuing to use this Website or the Support Service after these changes are posted, you agree to the revised policy.

2. Information from customers

What information do we collect from our customers and why?

- We collect our customers' name, email, billing address, payment details, company name, phone number, IP address, information about orders you initiate, and information about the device and browser you use.
 - We use this information to provide our merchants with the Services, including supporting and processing orders, risk and fraud screening, authentication, and payments. We also use this information to improve our Services.
- We use some of the personal information you provide us to conduct some level of automated decision-making -- for example, we use certain personal information (for example, IP addresses or payment information) to automatically block certain potentially fraudulent transactions for a short period of time.

When do we collect this information?

- We collect this information when you use or access our website, such as when you place an order or sign up for an account.

When and why do we share this information with third parties?

- BEC Ltd. works with a variety of third parties and service providers to help provide our merchants with the Services and we may share personal information with them to support these efforts.
- We may also share your information in the following circumstances:
 - to prevent, investigate, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service or any other agreement related to the Services, or as otherwise required by law.
 - to conform to legal requirements, or to respond to lawful court orders, subpoenas, warrants, or other requests by public authorities (including to meet national security or law enforcement requirements).
- Personal information may also be shared with a company that acquires our business or the business of a merchant whose store you visit or access, whether through merger, acquisition, bankruptcy, dissolution, reorganization, or other similar transaction or proceeding.
- BEC Ltd. is responsible for all onward transfers of personal information to third parties in accordance with the EU-U.S. Privacy Shield Framework, the Swiss-U.S. Privacy Shield Framework, and Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

3. Information from BEC Ltd. website visitors and support users

What information do we collect and why?

- As you visit or browse the BEC Ltd. website, we collect information about the device and browser you use, your network connection, your IP address, and information about the

cookies installed on your device. We also collect personal information submitted by you via any messaging feature available from any of our websites ("Messaging Feature").

- From telephone support users, we collect your phone number, call audio, and other personal information you provide us during our call. Pursuant to our Terms of Service, we may request additional documentation from you during our call to verify your identity.
- From chat support users, we collect your name, email address, information about the device and browser you use, your network connection, your IP address, chat transcript, and other personal information you provide us during our chat. Pursuant to our Terms of Service, we may request additional documentation from you during our chat to verify your identity.
- From forum users, we collect your name, email address, website URL, and other personal information you may post.

We use this information to verify your account, to provide and enhance our Services (including supporting or servicing your account, if applicable), and answer any questions you may have.

When do we collect this information?

- We collect this information when you visit the BEC Ltd. website, use Services offered on our website or engage with us either by email, web form, instant message, phone, or post content on or through our websites (including forums, blogs and via any Messaging Feature). We also collect any additional information that you might provide to us.

4. Information from cookies and similar tracking technologies

What is a cookie? A cookie is a small amount of data, which may include a unique identifier. Cookies are sent to your browser from a website and stored on your device. We assign a different cookie to each device that accesses our website.

Why does BEC Ltd. use cookies and similar tracking technology?

- We use cookies to recognize your device and provide you with a personalized experience on our websites, or otherwise through the Services. We also use cookies as part of the Services, for example to operate the shopping cart for our merchants' stores.

- We also use cookies to serve targeted ads from Google, Facebook, Bing, SourceKnowledge, and other third-party vendors.
- Our third-party advertising partners use cookies to track your prior visits to our websites and elsewhere on the Internet in order to serve you targeted ads. For more information about targeted or behavioral advertising, please visit <https://www.networkadvertising.org/understanding-online-advertising>.
- Opting out: You can opt out of targeted ads served via specific third party vendors by visiting the Digital Advertising Alliance's Opt-Out page.
- We may also use web beacons, software development kits, and other automated tracking methods on our websites, in communications with you, and in our products and services, to measure performance and engagement.
- Please note that because there is no consistent industry understanding of how to respond to "Do Not Track" signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

5. For how long do we retain your personal information?

- In general, we keep your personal information throughout your relationship with us. This means we will keep your information as long as you maintain an account our platform. For partners, this means we will keep your information until you inform us that you wish to terminate your partner relationship with us.
- Once you terminate your relationship with us, we generally will continue to store archived copies of your personal information for legitimate business purposes such as to defend a contractual claim or for audit purposes and to comply with the law, except when we receive a valid erasure request.
- We will continue to store anonymous or anonymized information, such as website visits, without identifiers, in order to improve our Services.

6. What we don't do with your personal information

- We do not and will never share, disclose, sell, rent, or otherwise provide personal information to other companies (other than to specific BEC Ltd. partners you are

interacting with, or to third party apps or service providers being used by the partners you are interacting with) for the marketing of their own products or services.

7. How do we keep your personal information secure?

- We follow industry standards on information security management to safeguard sensitive information, such as financial information, intellectual property, employee details and any other personal information entrusted to us. Our information security systems apply to people, processes and information technology systems on a risk management basis.
- No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee the absolute security of your personal information.

8. Residents of the European Economic Area (“EEA”)

BEC Ltd. provides services to users around the world, including in the EEA. If you are located in the EEA, we may transfer your personal information to other regions, including to Canada and the United States. In order to ensure that your information is protected when transferred out of the EEA, BEC Ltd. relies on the EU-U.S. Privacy Shield (described in more detail below).

If you are located in the EEA, you have certain rights under European law with respect to your personal data, including the right to request access to, correct, amend, delete, port to another service provider, or object to certain uses of your personal data. If you are a merchant, a partner, a visitor of BEC Ltd.’s website, or a user of BEC Ltd.’s support services and wish to exercise these rights, please reach out to us using the contact information below.

If you are unhappy with the response that you receive from us we hope that you would contact us to resolve the issue but you also have the right to lodge a complaint with the relevant data protection authority in your jurisdiction at any time.

Additionally, if you are located in the EEA, we note that we are generally processing your information in order to fulfill contracts we might have with you (for example if you make an order through the Site), or otherwise to pursue our legitimate business interests listed above, unless we are required by law to obtain your consent for a particular processing operation. In particular

we process your personal data to pursue the following legitimate interests, either for ourselves, our merchants, our partners, or other third parties (including our merchants' customers):

- To provide merchants and others with our services and applications;
- To prevent risk and fraud on our platform;
- To provide communications, marketing, and advertising;
- To provide reporting and analytics;
- To help merchants find and integrate with apps through our app store;
- To provide troubleshooting, support services, or to answer questions;
- To test out features or additional services; and
- To improve our services, applications, and websites.

When we process personal information to pursue these legitimate interests, we do so where we believe the nature of the processing, the information being processed, and the technical and organisational measures employed to protect that information can help mitigate the risks to the data subject.

9. How do we protect your personal information across borders?

While BEC Ltd. is a Cayman Islands company, we provide services to individuals and our technology processes data from users around the world. Accordingly, BEC Ltd. may transmit your personal information outside of the country, state, or province in which you are located. BEC Ltd. complies with the EU-U.S. Privacy Shield Framework, regarding the collection, use, and retention of personal information from data subjects in the European Economic Area ("EEA"), and with the Swiss-U.S. Privacy Shield Framework regarding the collection, use and retention of personal information from data subjects in Switzerland. In this regard, we have certified that we adhere to the Privacy Shield Principles of notice, choice, accountability for onward transfers, security, data integrity and purpose limitation, access, recourse, enforcement and liability.

If you are located in the EEA or in Switzerland, and believe that your personal information has been used in a manner that is not consistent with the relevant privacy policies listed above, please contact us using the information below. If your complaint or dispute remains unresolved, you may also contact the International Centre for Dispute Resolution®, the international division

of the American Arbitration Association® (ICDR/AAA). This organization provides independent dispute resolution services, at no charge to you. ICDR/AAA can be contacted at <http://go.adr.org/privacyshield.html>.

If, after attempting to resolve a dispute through ICDR/AAA, you feel that your concerns about the use of your personal information have not been resolved, you may seek resolution of the issue through binding arbitration. For more information about the binding arbitration process, please visit <http://www.privacyshield.gov>.

By participating in the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework, BEC Ltd.'s participating U.S. entities are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. For more information about the EU-U.S. Privacy Shield and the Swiss-U.S. Privacy Shield, please visit <https://www.privacyshield.gov>.

10. Control over and access to your personal information

BEC Ltd. understands that you have rights over your personal information, and takes reasonable steps to allow you to access, correct, amend, delete, port, or limit the use of your personal information. If you are unable to change your personal information within your account settings, or if you are concerned about data collected as you visit BEC Ltd.'s websites or use our support services, please contact us to make the required changes. It's important to remember that if you delete or limit the use of your personal information, the Services may not function properly.

If you have any questions about your personal information or this policy, or if you would like to make a complaint about how BEC Ltd. processes your personal data, please contact BEC Ltd. by email at privacy@bec.ltd, or by using the contact details below.

11. How to contact BEC Ltd.

BEC Ltd.

Attn: Chief Privacy Officer

C/O Stuarts Corporate Services, Ltd.

P.O. Box 251

4th Floor, Cayman Financial Centre

36 A Dr Roy Roy's Drive

Grand Cayman KY1-1104

Cayman Islands