



PRIVACY POLICY

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1. Privacy in Wingform

This Privacy Policy, as amended or otherwise changed from time to time (the “Privacy Policy”) explains the manner in which Digital Trading Solutions Inc. FZCO (the “Company”, “We”, “Us”, “Our”) collects, uses, maintains and discloses Personal Data in Our electronic platform (“Wingform”) and through the provision of Our services (the “Services”).

We routinely collect and use personal data about individuals, including our customers, business partners and service provider representatives (“you”). We are aware of Our responsibilities to handle your personal data with care, to keep it secure, and comply with applicable privacy and data protection laws, including the UAE Federal Law (45) of 2021 on the Protection of Personal Data (the “UAE Data Protection Law”).

The purpose of this Privacy Policy is to provide a clear explanation of when, why and how we collect and use information that may relate to you including, but not limited to, personal data collected via our website (<https://wingform.com/>) (the “Site”) or Our platform Wingform. Do read this Privacy Policy carefully. It provides important information about how we use personal data and explains your statutory rights. This Privacy Policy is not intended to override the terms of any contractual agreement you have with us, nor rights you might have available under applicable data protection laws, including the UAE Data Protection Law.

Definitions:

“Consent”: is the consent by which an individual authorizes third parties to process Personal Data relating to him or her. Consent must be clear, simple, specific, unambiguous and accessible. It can be given electronically.

“Data Controller”: anyone who determines the means, methods, standards and purposes of the processing of an individual's Personal Data.

“Data Processor”: which is anyone who processes Personal Data on behalf of a Data Controller and under their supervision and instruction.

“Personal Data”: which is any data relating to an identified natural person, or a natural person who can be identified, directly or indirectly, through the linking of data, by reference to an identifier such as his or her name, voice, picture, identification number, electronic identifier, geographical location, or one or more physical, physiological, cultural or social characteristics. Personal Data includes Sensitive Personal Data and biometric data

“Sensitive Personal Data”: which is any information that directly or indirectly reveals a person's race, ethnicity, political or philosophical views, religious beliefs, criminal record, biometric data, or any data related to such person's health.

2. Contact information

If you have any questions regarding this Privacy Policy, or how we use your personal data, you can contact us by:

(a) Email: dp@wingform.com

(b) Post: Digital Trading Solutions Inc. FZCO, HD-180, Sheikh Rashid Tower, Dubai World Trade Centre (DWTC), Dubai, United Arab Emirates, Shared PO Box: 416654

Data Protection Officer (DPO): You may contact Our DPO by email at dp@wingform.com

3. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in law, Our Personal Data collection and use practices, the features on the Site, or advances in technology. If material changes are made to this Privacy Policy, the changes will be prominently posted on the Site. Please ensure that you visit the Site regularly to ensure that you are familiar with the most current version of this Privacy Policy.

4. Data Controller

Digital Trading Solutions Inc. FZCO is the Data Controller of your Personal Data. As Data Controller subject to UAE Data Protection Law, We must ensure that any Personal Data We Process are:

- Processed fairly, lawfully and securely;
- for specified, explicit and legitimate purposes in accordance with the data subject's rights and not further processed in a way incompatible with those purposes or rights; and that it is
- adequate, relevant and not excessive in relation to the purposes for which they were collected or further processed;
- accurate and, where necessary, kept up to date; and
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data were collected or for which they are further processed.

5. What personal data do we collect?

We collect and process the following personal identification information for registration:

- Username;
- Contact details (email address, telephone number)

We may collect and process the following personal identification information and data to the extent necessary to create an Account and use Our Services:

- Full Name;
- Contact details (phone number, email address)
- Residential address and country of residence;
- Nationality;

- Occupation;
- Place and Date of Birth;
- Identity Document (National ID, Passport, Driver's license, Residence permit)
- Selfie and Biometrics through our Third-Party Partner
- Proof of address (Bank Statements, Utility bills, Internet/Cable TV/House phone line, Tax Returns, Council Tax bills, Government-issued certifications of residence.)
- Your status as a politically exposed person (PEP);
- Tax Identification Number (TIN)
- Bank account information;
- Source of Funds/Wealth Information/Documentation

We may also collect other Personal Data provided by third party identity verification, market surveillance providers, and sanctions screening services, service providers, regulators or via social networking websites.

We log technical information about your use of the Services, including the type of browser and version you use, the wallet identifier, the Internet Protocol (IP) address used to create the wallet and the most recent IP address used to access the wallet.

We collect information about the device you use to access your account, including the hardware model, operating system and version, and unique device identifiers.

In connection with Our Services, We may collect and maintain information relating to transactions you effect in your wallet.

We may collect referral URLs, your location, and blockchain analytics information related to the blockchain addresses you provide. Some of the Personal Data used by the blockchain and Virtual Asset exchange services is public information and can be seen by others, including, your public address and the type and amount of digital assets transferred. Additionally, certain technologies, such as blockchain, are immutable meaning that information, including Personal Data, cannot be deleted from the ledger. If you have concerns about this use of your Personal Data, do not use the Services

Some information is collected automatically by Our servers: a) We gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider ("ISP"), referring/exit pages, operating system, date/time stamp, and clickstream data; b) We use cookies to collect information. "Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing the website.

If you provide Us feedback or contact Us via e-mail, We will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

We also collect other types of Personal Data that you provide to Us voluntarily when seeking support and other Services, such as email, chat name and logs, information submitted via online form, video conferencing service information, other contact information, or other information provided to support services staff.

6. What do we use your personal data for?

We may collect personal identification information for the following reasons:

- to provide you with information with respect to Our Services, if you are a prospective user;
- to verify your identity, if you are a user, or if you have given your permission for us to verify your identity in order for us to provide Our Services to another user;
- to provide you with Our Services, if you have a user;
- to provide a third party with our services, where you are an actual or potential user of that third party;
- to manage our relationship with you, if you are a representative of a business partner, service provider or professional advisor;

7. How do we obtain your personal data?

Most of the personal data we process is provided to us directly by you when you input information on the Site.

We also may receive personal data indirectly, from the following sources in the following scenarios:

- from Our users, where you have given your permission for them to share that with us; and
- from national credit reporting agencies or other third parties, where necessary in connection with Our Services.

We may obtain Personal Data about you from other sources, including through third-party services such as sanctions screening services and other organizations to supplement information provided by you. This supplemental information allows Us to verify the information that you have provided to Us and to enhance Our ability to provide you with information about Our business, products, and Services.

8. Who do we share your personal data with?

We may share your Personal Data with

- Our Third Party Services Providers (including Our KYC/AML compliance providers);
- Our professional advisers;
- any third party you instruct us to share your personal data with in relation to the provision of Our Services, including our users.
- law enforcement and governmental agencies, to the extent we are legally required to do so;

9. How long do we keep your personal data?

We will retain your personal data for as long as is reasonably necessary for the purposes listed in Section 6 (What do we use Personal Data for?) of this Privacy Policy. In some circumstances, we may retain your personal data for longer periods of time, for instance

where we are required to do so in accordance with legal, regulatory, tax or accounting requirements. In specific circumstances we may also retain your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings. Where your personal data is no longer required we will ensure it is securely deleted.

10. Marketing

We may use your personal data to send you direct marketing communications about our products and services. This may be in the form of email, post, SMS, telephone or targeted online advertisements. In most cases, our processing of your personal data for marketing purposes is based on our legitimate interests to provide information in relation to our services that may be of interest to you, although in some cases (such as where required by law) it may be based on your consent. You have a right to prevent direct marketing of any form at any time by contacting us using the details set out in Section 2 (Contact). We take steps to limit direct marketing to a reasonable and proportionate level and to send you communications that we believe may be of interest or relevance to you, based on the information we have about you.

11. Legal basis for using your personal information

You will need to give Us Personal Data about yourself or other individuals in order to create and secure an Account and access Our Services, and you may give Us Personal Data about yourself, or other individuals to help Us provide you with or improve the Services you have asked Us for.

Under the UAE Data Protection Law, the lawful basis we rely on for processing your personal data are:

- Processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into an agreement or legal documentation;
- Processing is necessary for compliance with any regulatory or legal obligation to which We are subject as Data Controller;
- Processing is necessary to comply with a relevant legal or regulatory obligation that we have, including regulations for anti-money laundering, countering the financing of terrorism, and countering the financing of proliferation of weapons of mass destruction (AML/CFT/CPF), as well as sanction compliance and fraud prevention;
- Processing is necessary to support 'legitimate interests' that we have as a business (for example, to improve our products and services, or to provide certain services to our clients, where you are aware of the provision of those services and have given your permission for those services to be provided, to the extent they relate to you), provided it is conducted at all times in a way that is proportionate, and that respects your privacy rights.

12. Your data protection rights

You have the following rights under the applicable UAE Data Protection Law:

Be informed	You have the right to be provided with clear, transparent and easily understandable information about how companies use their information. This is essentially an obligation to provide privacy notices to individuals.
Access	You have the right to obtain access to their information so they can check that companies are using their information in accordance with the Data Protection Law
Rectification	You are entitled to have their information corrected if it is inaccurate or incomplete
Erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables individuals to request the deletion or removal of their information where there is no compelling reason to keep using it, subject to certain exceptions.
Restrict Processing	You have the right to 'block' or suppress further use of their information.
Data Portability	You have the right to obtain and reuse your Personal Data for your own purposes across different services. For example, if they decide to switch to a new provider, it enables individuals to move, copy or transfer their information easily between one company's IT systems and another's safely and securely, without affecting its usability.
Object to Processing	You have the right to object to certain types of processing.
Lodge a Complaint	You have the right to lodge a complaint about the way companies handle or process their Personal Data.

13. How to complain

If you have any questions about or any concerns or requests in relation to the Privacy Policy or our processing of your personal data, please contact us at dp@wingform.com.

Should you wish to report a complaint or feel that we have not addressed your concern in a satisfactory manner, you may contact the UAE Data Office. The UAE Data Office is responsible for promoting data protection in UAE, preparing policies and legislations related to data protection, proposing and approving the standards for monitoring Personal Data Protection Law, preparing systems for complaints and grievances related to data, and issuing guidelines and instructions for the implementation of the law.