



PRIVACY POLICY

Vaulto Digital Assets Platform

Protecting Your Privacy in Digital Finance

Effective Date: January 1, 2024

1. INTRODUCTION

Vaulto ("we," "our," or "us") is committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our digital asset platform, including our stablecoin suite (vltUSD, vltUSDY, vltUSDe) and tokenized private equity services.

2. INFORMATION WE COLLECT

2.1 Personal Information

- Identity verification information (name, date of birth, government ID)
- Contact information (email address, phone number, mailing address)
- Financial information (bank account details, transaction history)
- Know Your Customer (KYC) and Anti-Money Laundering (AML) documentation
- Tax identification numbers and related documentation

2.2 Technical Information

- Device information (IP address, browser type, operating system)
- Usage data (pages visited, time spent, click patterns)
- Blockchain wallet addresses and transaction data
- Cookies and similar tracking technologies

2.3 Financial and Trading Information

- Investment preferences and risk tolerance
- Trading history and portfolio composition
- Stablecoin holdings and transaction patterns
- Private equity investment activities

3. HOW WE USE YOUR INFORMATION

3.1 Service Provision

- Facilitate stablecoin transactions and private equity investments
- Provide customer support and account management
- Process payments and maintain accurate records
- Enable access to tokenized private equity opportunities

3.2 Compliance and Security

- Comply with regulatory requirements (KYC/AML, tax reporting)
- Prevent fraud, money laundering, and unauthorized access
- Maintain audit trails and regulatory reporting
- Ensure platform security and integrity

3.3 Platform Improvement

- Analyze usage patterns to improve user experience
- Develop new features and services
- Conduct research and analytics
- Provide personalized investment recommendations

4. INFORMATION SHARING AND DISCLOSURE

4.1 Service Providers

We may share information with trusted third-party service providers including:

- Identity verification services
- Payment processors and banking partners
- Blockchain infrastructure providers
- Cloud storage and security services
- Legal and compliance advisors

4.2 Legal Requirements

We may disclose information when required by law or to:

- Comply with legal processes and regulatory requirements
- Respond to government requests and investigations
- Protect our rights, property, and safety
- Prevent fraud and enforce our terms of service

4.3 Business Transfers

In the event of a merger, acquisition, or sale of assets, your information may be transferred to the acquiring entity, subject to the same privacy protections.

5. DATA SECURITY

5.1 Security Measures

- Industry-standard encryption for data transmission and storage
- Multi-factor authentication and access controls
- Regular security audits and penetration testing
- Secure blockchain infrastructure and smart contract protocols
- Employee training on data protection best practices

5.2 Data Retention

We retain personal information for as long as necessary to provide services and comply with legal obligations. Financial records may be retained for up to 7 years as required by applicable regulations.

6. YOUR RIGHTS AND CHOICES

6.1 Access and Control

- Access and review your personal information
- Request corrections to inaccurate data
- Request deletion of personal information (subject to legal requirements)
- Opt-out of marketing communications
- Data portability rights where applicable

6.2 Cookie Management

You can manage cookie preferences through your browser settings, though this may affect platform functionality.

7. INTERNATIONAL TRANSFERS

Your information may be transferred to and processed in countries other than your residence. We ensure appropriate safeguards are in place to protect your information in accordance with applicable data protection laws.

8. CHILDREN'S PRIVACY

Our services are not intended for individuals under 18 years of age. We do not knowingly collect personal information from minors.

9. UPDATES TO THIS POLICY

We may update this Privacy Policy periodically. Material changes will be communicated through our platform or via email. Your continued use of our services constitutes acceptance of the updated policy.

10. REGULATORY COMPLIANCE

We comply with applicable data protection regulations including GDPR, CCPA, and other relevant privacy laws. Our practices are designed to meet the highest standards of financial services data protection.

CONTACT INFORMATION

Data Protection Officer

Email: charliebc@vaulto.ai

Address: 2108 N ST STE N, Sacramento, CA 95816

For privacy-related inquiries and exercising your rights, please contact us using the information above.

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