

<b>Policy Name</b>	Customer Privacy Policy
<b>Responsible Party</b>	David Trost
<b>Contact</b>	<a href="mailto:privacy@compto.com">privacy@compto.com</a>
<b>Status</b>	Under Review
<b>Effective Date</b>	
<b>Revision Date</b>	February 2025

## Compto Public Benefit Corporation Customer Privacy Policy:

Compto Public Benefit Corporation (“we,” “our,” or “us”) respects your privacy and is committed to protecting your personal information. This Privacy Policy explains how we collect, use, store, and share your data when you use our services, including our website, mobile applications, and any related products or services.

By using our services, you consent to the practices described in this Privacy Policy.

### 1. Information We Collect

We collect the following types of personal information:

#### 1.1 Information You Provide to Us:

- **Personal Identifiers:** Name, email address, phone number, date of birth, Residential address, and government-issued ID (if required).
- **Financial Information:** Payment details, transaction history, linked bank accounts, and wallet addresses.
- **Authentication & Security Data:** Passwords, PINs, and identity verification data.
- **Customer Support Data:** Any information you provide when contacting us for support.

#### 1.2 Information We Collect Automatically:

- **Device & Usage Data:** IP address, device type, operating system, and app usage statistics.
- **Transaction Data:** Records of deposits, withdrawals, and cryptocurrency transactions.
- **Cookies & Tracking Data:** We use cookies and tracking technologies to enhance your experience and analyze user behavior.

#### 1.3 Information from Third Parties:

- **Regulatory & Compliance Data:** Information received from identity verification services and fraud prevention agencies.

- **Marketing & Analytics Data:** Data received from advertising partners and analytics providers.

## **2. How We Use Your Information**

We process your personal information for the following purposes:

- To provide and manage our services.
- To verify your identity and comply with regulations (e.g., KYC/AML requirements).
- To facilitate transactions and secure your account.
- To detect, prevent, and investigate fraud or security incidents.
- To improve our platform and user experience.
- To send account updates, security alerts, and promotional communications (with your consent).
- To comply with legal obligations and respond to law enforcement requests.

## **3. How We Share Your Information**

We do not sell your personal data. However, we may share it with: Regulatory Authorities & Law Enforcement when required by law. Service Providers & Business Partners for identity verification, payment processing, fraud detection, and security monitoring. Affiliates & Corporate Transactions if we undergo a business merger, acquisition, or sale.

## **4. Data Storage & Security**

We implement industry-standard security measures to protect your personal data from unauthorized access, loss, or misuse.

- **Data Encryption:** All sensitive data is encrypted in transit and at rest.
- **Access Controls:** Only authorized personnel can access user data.
- **Retention Policy:** We retain your data for as long as necessary to comply with legal obligations and business operations.

If you believe your data has been compromised, please contact us immediately at [privacy@compto.com](mailto:privacy@compto.com).

## **5. Your Rights & Choices**

You have the right to:

- **Access Your Data:** Request a copy of the personal data we hold about you.

- **Correct Your Data:** Update inaccurate or incomplete information.
- **Delete Your Data:** Request deletion of your data (subject to legal requirements).
- **Withdraw Consent:** Opt out of marketing communications or restrict certain processing activities.

To exercise any of these rights, contact us at [privacy@compto.com](mailto:privacy@compto.com).

## Revisions

Revision	Revision Date	Effective Date	Description of Changes	Approved By
v1.0	January 2025	January 2025	- Initial Release	David Trost
v1.1	February 2025		- Switch to md - add revisions	