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Privacy Policy

DHS International Exchange FZE is a free zone entity under the Dubai World Trade Centre authority registration number: L-3990. Its registered office is at Office No. 5.18, Floor 05, Convention Tower, Dubai World Trade Centre, Dubai, United Arab Emirates. We value our customers trust and are committed to protecting their personal information. We view data protection as a vital responsibility.

This Privacy Notice explains how DHS International Exchange FZE collects, uses and manages your personal information when you interact with our websites, platforms or applications mentioned in this document.

This Privacy Notice covers all processing of personal information conducted by DHS International Exchange FZE related to its users. **Personal Data** means any details that identify or can identify a person, either directly or indirectly through other available information.

As the Data Controller, DHS International Exchange FZE decides how and why we handle your Personal Data. Our processing of Personal Data complies with applicable laws, including the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL) as well as regulations issued by the Dubai Virtual Assets Regulatory Authority (VARA). We are responsible for ensuring that we process your information legally, fairly and transparently in relation to the services we offer.

DHS International Exchange FZE is authorized and regulated by the Dubai Virtual Assets Regulatory Authority (VARA) to operate activities related to virtual assets in the Emirate of Dubai, including its free zones, except for the Dubai International Financial Centre (DIFC).

For customers and service users, please read this Privacy Notice alongside the DHS International Exchange FZE Terms of Use, the specific terms for our products (as defined in the Terms of Use) and any other agreements that relate to your relationship with us. Any terms in this Privacy Notice have the same meaning as defined in the Terms of Use unless stated otherwise.

For website visitors who are neither customers nor service users this Privacy Notice still applies along with our Cookie Policy, which explains how we use cookies and similar technologies. Both documents should be read together to fully understand our practices. You can access the Cookie Policy [here](#).

By visiting, browsing or using our platform, you confirm that:

- (a) you have the authority and legal capacity to agree to this Privacy Notice,
- (b) you have read and understood its content and
- (c) you consent to the practices and policies described here.

What Personal Data Do We Collect and Handle?

Personal Data refers to any information that can directly identify you or can be linked to you. We collect this information in three main ways: data you give us, data we gather automatically when you use our services and data shared with us by others.

Information you provide directly:

When you create an account and use our services, we will ask for certain details. Some of this information is legally required; for example, we need it to verify your identity and meet regulatory obligations like Know Your Customer (KYC) rules. Other details are necessary for us to provide the services you request, such as your email address to register an account. In some cases, we may also ask for extra information if we introduce new features or services.

If you decide not to provide the required information, DHS International Exchange FZE will not be able to give you access to our services.

We may collect various types of information about you, including:

Category of Data	Examples of Information Collected
Personal Identification Information	Full name, email address, gender, residential address, phone number, date of birth, nationality, signature, utility bills, photographs and video recordings.
Sensitive and Biometric Data	Data that reveals personal characteristics such as ethnicity, family background, political or philosophical opinions, religious beliefs, criminal records, health information (physical, mental, genetic or sexual), or biometric information. For instance, we may collect biometric data to verify identity, such as facial scans compared with your

	government-issued ID, when permitted by law or with your consent.
Government Identifiers	Information from official documents including passports, national ID numbers, identity cards and driver's license details.
Online Identifiers	Social media handles or profiles, for example on platforms like Telegram or X.
Institutional Information	Documents proving legal establishment, identification of significant beneficial owners and personal information of directors or senior executives responsible for corporate operations.
Financial Information	Bank account details, payment card information, sources of funds and information about your financial background.
Wallet Information	Digital wallet addresses, wallet IDs and details related to any wallet integration you choose to use.
Transaction Information	Details of transactions made using our services, including recipient name, sender name and email address.
Information from Cookies	Data collected via cookies and similar technologies. Please refer to our Cookie Policy for more details.
Employment Information	Job title, salary or wage information and employer details.
Communications	Responses to surveys, survey-related data and interactions with us, including call recordings with customer support.
Contact Information	Email address, country and region.

To the extent allowed by applicable laws, we may automatically gather certain types of information whenever you interact with our services. We use this information to improve

your experience, optimize site performance, resolve support issues and protect your account by detecting unauthorized access or suspicious activity.

Types of information collected automatically include:

Category of Data	Examples of Information Collected
Browsing Information	Device ID, browser type and version, IP address and other details about your device and web activity.
Usage Data	Authentication details, responses to security questions, click-stream data, public social media posts and information collected through cookies or similar tracking technologies.
Service Performance Data	Information about how our services work, including error messages and performance metrics experienced during your use.
Marketing and Research Data	Online identifiers like IP address, email address for communications, name and address; demographic details such as age range, gender, income level, family status, interests and preferences; browsing history; device type and operating system; and analytics or profiling based on collected data. This also includes inferred interests and marketing preferences

For more details on automatic data collection, tracking and profiling, please refer to our [Cookie Policy](#).

Information Collected from Third Parties and Affiliates

From time to time, we may receive additional information about you from our affiliates or other third-party sources, when allowed or required under applicable law. This helps us provide better services and support your interactions with our platforms.

Source	Examples of Information Collected
Affiliates	Information from our affiliates may include personal identification details, transaction history, institutional information and usage data to help deliver affiliated services.
Public Blockchain Data	Data available on public blockchains such as transaction IDs, amounts, wallet addresses, timestamps or other event information.
Retail Merchants	When you make purchases with third-party merchants, they may provide us with personal information such as your name, contact details and information related to the transaction.

1. Managing our contractual relationship with you

- ✓ We process your Personal Data to create and manage your account and provide the services you request. This includes handling orders, processing payments and facilitating transactions.
- ✓ Types of data involved: Personal Identification Information, Institutional Information, Contact Information, Financial Information.
- ✓ Impact if data is not provided: You may not be able to open an account, or your existing account may be suspended or terminated.
- ✓ Processing in this context is necessary for the performance of the contract between you and DHS International Exchange FZE.

2. Compliance with legal and regulatory requirements

- ✓ Our services follow specific laws and regulations that may require us to collect, use and store certain Personal Data. For instance, we need Personal Identification Information and in some cases, Sensitive or Biometric Data to meet Know Your Customer (KYC) obligations, Anti-Money Laundering (AML) rules and other regulatory requirements.
- ✓ Types of data involved: Personal Identification Information, Institutional Information, Sensitive/Biometric Data, Government Identifiers, Contact Information, Financial Information.
- ✓ Impact if data is not provided: You may not be able to open an account, or we may need to close an existing account to comply with legal obligations.

- ✓ Processing in this context is necessary to meet our legal obligations under applicable laws and regulations.

3. Communicating with you regarding services and transactions

- ✓ We use your Personal Data to send account-related or administrative messages, provide updates about our services, inform you about security issues or share other transaction-related information. Important service communications cannot be opted out of, as they help keep you aware of key developments affecting your account.
- ✓ Types of data involved: Personal Identification Information, Contact Information.
- ✓ Processing here is necessary for the performance of the contract between you and DHS International Exchange FZE.

4. Providing customer support

- ✓ When you contact us with questions, disputes, complaints or technical issues, we process your Personal Data to provide effective support.
- ✓ Types of data involved: Personal Identification Information, Institutional Information, Transaction Information, Communications, Contact Information, Financial Information, Browsing Information, Usage Data.
- ✓ Impact if data is not provided: We will be unable to respond to your requests or resolve issues.
- ✓ Processing here is necessary for the performance of the contract. Additionally, where permitted under applicable law, processing may also be based on our legitimate interest in improving service quality and enhancing your user experience.

5. Ensuring safety, security and integrity of our platform

- ✓ We use your Personal Data to protect the platform, verify identities, monitor access, detect fraud and prevent abuse or violations of our Terms of Use. This also includes addressing security risks and complying with security-related legal requirements.
- ✓ Types of data involved: Personal Identification Information, Institutional Information, Transaction Information, Contact Information, Financial Information, Browsing Information, Usage Data.
- ✓ Impact if data is not provided: We may not be able to maintain the security, integrity or proper functioning of our services.

Processing here is necessary for the performance of the contract and, where applicable, may also support our legitimate interest in keeping a secure and reliable service.

Purposes for Processing Personal Data

1. Providing services

- ❖ We process your data to deliver our services, manage orders, facilitate transactions and fulfill requested actions. For example, to use exchange or payment features, we may need identification, contact and financial information.
- ❖ Types of data involved: Personal Identification Information, Institutional Information, Transactional Information, Contact Information, Financial Information, Browsing Information, Usage Data.
- ❖ Legal basis: Processing is necessary to perform a contract. Additionally, when applicable, processing may rely on legitimate interests to improve documentation and service quality.

2. Marketing and social media services

- ❖ We may use your Browsing and Usage Data for marketing, advertising, or promotion through social media and other advertising platforms.
- ❖ Consent required: Processing is based on your consent, which you can withdraw at any time. Withdrawal does not affect the legality of prior processing.

3. Improving services and user experience

- ❖ We process data to improve platform functionality, fix errors and enhance user experience.
- ❖ Types of data involved: Personal Identification Information, Institutional Information, Transactional Information, Browsing Information, Usage Data.
- ❖ Legal basis: Processing is necessary to protect your interests and, where applicable, may be based on our legitimate interest in improving services.

4. Promotions and incentives

- ❖ We may use your information to provide promotions, offers, rewards, competitions, surveys, or prize draws.
- ❖ Types of data involved: Personal Identification Information, Institutional Information, Transactional Information, Browsing Information, Usage Data, Online Identifiers.
- ❖ Consent and legal basis: Consent is required for marketing promotions and you can withdraw it anytime. Processing may also rely on legitimate interests to reward user engagement.

5. Research and innovation

- ❖ We conduct surveys, research and development initiatives to enhance our services and products. We may also use information for marketing purposes.
- ❖ Legal basis: Processing may rely on consent where required or on legitimate interests to improve services and encourage innovation.

6. Internal business purposes and record keeping

- ❖ We keep certain Personal Data for record-keeping, monitoring contractual obligations and conducting internal research.
- ❖ Types of data involved: Personal Identification Information, Financial Information, Transaction Information, Browsing Information.
- ❖ Legal basis: Processing is necessary to meet legal obligations and for legitimate business needs.

7. Recommendations and personalization

- ❖ We use data to suggest relevant services, features and content. We tailor your experience based on your preferences and usage patterns.
- ❖ Legal basis: Processing may be necessary for contract performance or rely on legitimate interests to improve user experience. We may also obtain consent where required.

8. Marketing communications

- ❖ We send targeted marketing messages via email, mobile, or in-app notifications, using profiling to identify relevant promotions.
- ❖ Types of data involved: Personal Identification Information, Institutional Information, Transactional Information, Browsing Information, Usage Data, Marketing/Research Information, Communications.
- ❖ Consent and legal basis: Consent is required for marketing communications, which You may opt out of receiving marketing communications at any time by clicking the **unsubscribe** link in our emails, adjusting your account settings, or contacting us at dpo@dhscrypto.com. Please note that you cannot opt out of essential service-related communications.

9. Events

We host live or virtual events, conferences and workshops. We may use Personal Data to:

- ◆ Provide event-related information and services including ticketing.
- ◆ Collect presenter information, photos, or recordings when applicable.

- ◆ Share attendee information with sponsors or co-organizers, based on consent.
- ◆ Communicate about other events and improve attendee experiences.

Legal basis: Processing may depend on contract performance, legitimate interests, or consent, depending on the activity. You can withdraw consent anytime without affecting prior processing.

10. Cookies and similar technologies

We use cookies to collect usage data and improve our services functionality.

Consent: Where required by law, we obtain consent and you can withdraw it at any time.

11. Legal and regulatory compliance

We may access, preserve and disclose Personal Data to meet legal obligations, respond to law enforcement requests, court orders or regulatory requirements.

Types of data involved: Personal Identification Information, Institutional Information, Financial Information, Transaction Information, Browsing Information, Usage Data, Blockchain Data.

Legal basis: Processing is necessary to comply with applicable laws. When not strictly required, processing may depend on legitimate interests in good faith compliance.

Use of Services by Minors

Our services are not available to anyone under the age of 21. We do not knowingly collect or process Personal Data from individuals below this age.

Cookies and Similar Technologies

We use cookies and similar tracking technologies to improve your experience, provide our services efficiently, support marketing efforts and understand how users interact with our platform. Depending on local laws, your browser may show a cookie banner allowing you to accept or refuse cookies. For more information, please refer to our Cookie Policy.

How and Why We Share Personal Data

We may share your Personal Data with third parties, including affiliates, if required by law, regulatory obligations, contractual relationships or business needs.

Affiliates:

Data may be shared among affiliated companies to provide services and conduct business. We ensure that affiliates follow privacy practices that are at least as protective as this Privacy Notice.

Third-party service providers:

We work with external vendors for tasks such as data analysis, marketing, payment processing, content delivery and risk assessment. These parties only access the Personal Data necessary to perform their services and must follow data protection laws and contractual agreements. You may also exercise your data portability rights with these providers where applicable.

Legal authorities:

We may disclose Personal Data to courts, regulators, law enforcement, or other legal bodies to:

- Comply with applicable laws or legal obligations.
- Establish, exercise, or defend legal rights.
- Respond to legal requests, subpoenas, or court orders.
- Protect the rights, property, or safety of users or the company.
- Investigate fraud, illegal activity, or violations of our Terms of Use.

Business transfers:

If we engage in mergers, acquisitions or asset sales, user information may be transferred as part of the transaction, following existing privacy commitments.

With your consent:

We may share your Personal Data in specific ways described at the time of collection or when you provide consent. You can withdraw consent at any time.

International Data Transfers

To support our global operations, Personal Data may be transferred outside Dubai or the UAE, including to countries with different data protection standards. Where we transfer Personal Data outside the UAE, we ensure appropriate safeguards are in place, such as adequacy decisions, contractual obligations or your explicit consent, in line with applicable data protection laws.

Data Security

We put in place appropriate security measures to protect your Personal Data from unauthorized access, disclosure, alteration or loss. This includes encryption, physical and electronic safeguards and controlled access. Employees and third parties only access Personal Data on a need-to-know basis.

We recommend using unique passwords and signing out of shared devices to help protect your account.

Advertising

We may share Personal Data with marketing partners for targeted advertising, analytics and promotions. You have the right to object to direct marketing at any time.

Your Rights

You have the following rights regarding your Personal Data:

- Access: Request confirmation and a copy of your data.
- Correction: Rectify inaccurate or incomplete information.
- Deletion: Request deletion where legally permitted.
- Objection/opt-out: Object to specific processing activities.
- Restriction: Temporarily limit processing under certain conditions.
- Data portability: Receive your data in a machine-readable format or request transfer to another service provider.
- Automated decision review: Request a human review of decisions made solely through automated processing.
- Consent withdrawal: Withdraw consent at any time without affecting prior processing.
- Lodge a complaint: Contact the UAE Data Office or the relevant data protection authority if concerns remain unresolved.

To exercise your rights, please contact us via email: dpo@dhscrypto.com.

Data Retention

We keep your Personal Data as long as necessary to provide services, comply with legal obligations, resolve disputes or meet regulatory requirements. Certain identity and sensitive data may be retained for up to 10 years to comply with UAE Anti-Money Laundering laws and VARA record keeping obligations.

Contact Information

You can contact our Data Protection Officer via email at dpo@dhscrypto.com with any questions or concerns regarding your Personal Data.

Updates to this Privacy Notice

Our business and services evolve, so this Privacy Notice may be updated accordingly. We encourage you to check our website regularly for the latest version. When we make material changes, we will notify you by platform notifications or a notice on our website. The date of the latest version will always appear at the top of this page.