

# Privacy Policy – Tin-DeFi

## Introduction

This Privacy Policy explains what we do with your personal data to provide the services offered on our website ("Site"), such as sending complaints, subscribing to mailings, communications, purchases, customer service chats, among others (the "Services"). Our policy also explains the data we may collect when you visit the Site, as well as how we may use and share it. Please use this policy carefully to understand how we process data and if you have any questions, feel free to contact us.

If you do not provide the information indicated as mandatory, we may not be able to process your user registration or provide the use of some Services on our Site. This is because some benefits of our Services require that personal information be shared. Among the personal data we may collect are: name, email, IP address, device identifier, among others. You are solely responsible for ensuring the accuracy of the data you share with us, since, if you keep untruthful or outdated information within you, this may affect your use of the site, the information you receive from it and our ability to contact you.

In order to communicate with us and browse the Platform, it is necessary that you are over 18 years old. Tin-DeFi may use your personal information to verify your age and ensure compliance with this restriction.

## Legal basis for the processing of personal data

The collection and processing of personal data is mainly based on the contractual and non-contractual relationship you have with us. When we send newsletters and when you use our Services, or when we use the e-mail address you have provided to us to contact you individually or to recognize you when you revisit our website, it is done under informed consent. The way in which we process the information collected by our cookies is based on the informed consent you have given us, in accordance with current legislation.

Within Tin-DeFi, we adhere to the regulatory compliance of the company's country of domicile, as well as internationally, to the rules of the General Data Protection Regulation ("GDPR"), as well as the Privacy Shield of the United States. In general, we follow all current legal guidelines to ensure respect and protection of your data.

## Personal Information We Collect

To create a user on our Site, it will be necessary for you to provide your personal information, such as, but not limited to e-mail address, date of birth, country or city in which you reside, your name, your surname and any other data you wish to share in your profile.

However, if you do not create a user and only purchase a product through us, only one reading of the wallets will be made when connecting the wallets.

When you visit or use our Services, we record data that also relates to the frequency of use, the date and time of access, when you view or click on specific content. We may also collect information from URLs from which you were redirected to our site. We use this information when you log in and when you read our e-mails, and we use Internet Protocol ("IP") addresses to identify you and record your use of the Site.

## About data processing

Tin-DeFi will process your personal data based on the following:

1. Manage your registration as a user of the Site, to identify you and give you access to the Services that are available to users registered on it.
2. The development, fulfillment and execution of the contract for the provision of our services.
3. Contact you by e-mail to update you and inform you about resources, products or services offered, including security updates to the Platform, whenever necessary and reasonable.
4. Respond to requests or inquiries you make through the customer service channels available on our Platform.
5. We also use your information to generate non-identifiable aggregate data. For example, to generate statistics about our users, their jobs or areas of expertise, the number of impacts or clicks on a given course or project, or their demographics.
6. For Tin-DeFi's legitimate interests, such as:
  - a) Manage, develop and grow our business
  - b) Operate our Site and provide our Services
  - c) Appropriately select suppliers
  - d) Research and statistical analysis
  - e) Marketing Development
  - f) Management and internal audit purposes

All handling of your personal data is done with the consent you give us by reading this policy and making use of the Site. If you wish to withdraw your consent, you may do so, but it is likely to affect your ability to provide our Services.

## Data retention period

Your personal data will be retained for as long as necessary according to the purposes for which we have collected and processed such data, and in no case will it exceed that period. The exact time will depend on the purposes for which we have collected and used the information, always considering the applicable laws and respecting the right to data protection.

## Recipients of the data

To fulfill the objectives indicated in this Privacy Policy, it may be necessary to provide or disclose your personal data to third parties due to the following reasons:

- Relationships with service providers: to provide services on our behalf or to help us provide our services. For example, we engage vendors to perform marketing, advertising, communication, INFRASTRUCTURE and IT services, to personalize and improve our service, to process transactions with credit cards or other payment methods, for customer service, to collect debts, analyze and improve data (such as data related to the interaction of users with our services), and to process and manage satisfaction surveys.

By accepting our Privacy Policy, you specifically authorize us to process and report our personal data to the aforementioned providers for the purposes described herein and to offer a complete service. As Tin-DeFi, we are committed to ensuring that such providers comply in turn with the rules of protection of personal data.

## Data protection rights

Because Tin-DeFi collects, uses and stores personal data of its users, we are committed to respecting the confidential nature of all personal data and guarantee the full exercise of these rights. Among the rights and principles that are sought to protect with our privacy policy are:

1. Right to access. Right to confirm whether we are processing your personal data and, if we are, you have the right to obtain a copy of the data and information related to the processing.
2. Principle of notice. We Will provide appropriate and timely notice describing the personal information we are collecting, how we will use that information and the third parties with whom we may share it, as well as the reasons why we will share it.
3. Principle of option. As a user, you will have the opportunity to opt out of sharing personal information with unnecessary third parties and for any purpose or purpose materially different from the initial purpose for which the information was collected. You will also

have the right to request that your personal data not be used for direct marketing purposes.

4. Right of modification. The right to correct errors, to modify incomplete or erroneous data and to guarantee the authenticity of the information processed is guaranteed.
5. Right to delete. As a user, you have the right to request the deletion of your personal data without undue delay, if it has been processed erroneously or if the purpose for which it has been processed or collected has ceased to exist.
6. Right to limit processing. Right to request the suspension of the processing of information if it is unlawful or if the accuracy of the data is questioned.
7. Data integrity and limitation of use. Your personal data will be processed in a manner that is relevant and compatible with the purpose for which it was collected and for which you authorize its use. Reasonable and necessary steps will be taken to ensure that such information is truthful, complete, current and reliable for the intended use.

The exercise of such rights is free of charge, except when the claims are deliberately unfounded or excessive, in which case the subject will have to pay the costs of the process.

## Use of cookies

We use cookies, small files with information related to your navigation on our Site, mainly to enable a better user experience. Please read our Cookie Policy for more information about the cookies we use, their purpose and other useful information.

## Changes

Tin-DeFi may update this Privacy Policy from time to time and in accordance with legal, regulatory or operational modifications. In the event of a modification, we will notify these changes (including the date from which the modifications take effect) in accordance with legal requirements.