

PRIVACY POLICY

Last updated: November 20, 2023

The Company is committed to protecting and respecting your privacy, managing your personal data transparently and in a fair and lawful manner.

This Privacy Policy (together with our Terms of Use and any other documents referred to herein) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. **Please read the following carefully to understand our practices in processing your data, as well as your rights regarding your personal data and how we will treat it. Your acceptance may limit or waive certain of your rights. It is your responsibility to re-review this Privacy Policy if you have not reviewed it since the “Last updated” date above.**

By visiting our Sites or otherwise utilizing any of the Services and submitting data to us, you are accepting and consenting us to use your personal data as described in this Privacy Policy. Please refrain from accessing the Sites if you disagree with this Privacy Policy.

We may update our Privacy Policy from time to time. In the event of any change, amendment or update to this Privacy Policy by the Company, you agree to be bound by this Privacy Policy, as may be amended, if you continue thereafter utilizing any of the Sites or the Services after notice that there has been a change, amendment or update, which may take the form of alerting you to the “last updated” date so that you can determine whether there has been an update since your last review, or any other form of notice the Company elects to provide in its sole discretion. If you do not agree to this Privacy Policy, please exit the Sites and immediately cease usage of the Sites and the Services.

Your Personal Data

We may collect and process personal data provided directly by you; we also process, insofar as necessary, personal data provided to us by third parties, including publicly accessible data, personal data legitimately provided by other group companies and personal data provided by other trusted third parties. You are responsible to provide us with personal data that is correct and inform us of any changes occurring in your data in writing, so that we may take all reasonable measures to keep our records in your regard correct and up to date. You have the choice, at any time, not to provide your personal data to the Company; however, do note that failure to provide such personal data for us to process may result in the Company being unable to continue to provide our Services to you or pursue any contractual relationship which may be in place between us.

Personal Data you give us

You may give us personal data about you by connecting your Wallet, filling in forms on the Sites, submitting your documents or by corresponding with us by phone, e-mail or otherwise. This includes personal data you provide when you register on the Sites, use our Services, or when you report a problem with the Sites. Examples of such personal data you may provide to us may include (depending on the nature of your interaction with us) your wallet address, name, passport or other identification number, telephone number, mailing address, email address, identification data (such as copies of your identification document or personal photograph) and financial and credit card information, and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you. You may also provide us with personal data of your officers, employees, agents and customers in order for us to provide you with our Services.

Personal Data and information we collect about you

With regard to each of your visits to our Sites we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. An IP address is a number that is automatically assigned to your computer when you sign up with an Internet Service Provider. When you visit our website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server, and to administer our Sites.
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- If you contact us or we contact you using the telephone, we may monitor or record the phone call for quality assurance, training and security purposes.

Personal Data we receive from other sources

We may receive personal data about you if you use any of the other websites we operate or other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising

networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

Apart from personal data, we may collect other types of information which are not related to an individual and which are anonymous. For example, the number of website visitors and the number of website users using a particular service. In this way, we hope to improve our customer services.

Processing your personal data

We collect and process your personal data, including data provided by you, data we collect about you and data provided by third parties in the following ways and upon the following grounds:

- for the fulfillment of contractual obligations entered into between you and us and to provide you with the information, products and services that you request from us;
- for the fulfillment of legal obligations and legal compliance;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit specific third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS or others) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you, subject to your consent. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only subject to your consent.
- to safeguard legitimate company interests which require processing beyond the fulfilment of contractual obligations such as:
 - + processing of personal data for the purposes of our daily operations including billing and debt collecting;
 - + processing of personal data for market research, statistical purposes and service and product development;
 - + processing of your data for the protection of the company's legal position in the event of legal proceedings;

- + processing for the purposes of ensuring network and information security, including preventing unauthorized access to electronic communications networks and stopping damage to computer and electronic communication systems;
- + processing for the purpose of reporting possible criminal acts or threats to public security to competent authorities;
- + to administer our Sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- + to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- + to allow you to participate in interactive features of our services, when you choose to do so;
- + as part of our efforts to keep our Sites safe and secure;
- + to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- + to make suggestions and recommendations to you and other users of our Sites about services that may interest you or them;
- + for accurately carrying out and confirming your instructions, for training purposes and/or in order to improve the quality of our customer services. Such data shall include calls, email communication and online chats.

Disclosure of your personal data

As part of our compliance procedure, the Company may forward your data to trusted third parties to be processed for Anti-Money Laundering (“AML”), Counter Terrorist Financing (“CTF”), Counter Proliferation Financing (“CPF”) purposes. Your personal data may also be provided to trusted third-party processors for the customer care and client communication services, credit reference, fraud prevention, business scoring, credit scoring, placing of monetary deposits, transfer of payments, debt collection and recovery. Such processing shall be conducted in compliance with all legal requirements as well as our Privacy Policy and strict retention policies and codes of conduct. We will ensure that all companies to which we disclose your Personal Data will only process it in accordance with our instructions and on our behalf, and that they shall only use such data to the extent to which we ourselves are entitled.

We may share your personal data with any member of our group of companies, which means our subsidiaries and our ultimate holding company and its subsidiaries.

We may share your personal data with selected third parties including:

- Business partners, suppliers and subcontractors for the performance of any contract we enter into with them;
- Analytics and search engine providers that assist us in the improvement and optimization of our site;
- Credit reference agencies, AML/CFT/CPF service providers for the purpose of compliance where this is a condition of us entering into a contract with you.

We may disclose your personal data to third parties for the purpose of fulfilling legitimate company interests:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging data with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- For the purposes of billing, debt collecting credit rating and verification and fraud prevention;
- For the protection of the Company's legal position in the event of legal proceedings.

We will ensure that all companies to which we disclose your personal data will only process it in accordance with our instructions and on our behalf, and may only use such data to the extent to which we ourselves are entitled. All such companies and third parties will further be required by us to meet the requirements of data protection legislation and our strict privacy and retention policies to keep your data secure at all times.

We may, if necessary or authorized by law, provide your personal data to law enforcement agencies, regulatory organizations, courts or other public authorities. We attempt to notify you about legal demands for your personal data unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe that the requests are disproportionate, vague or lack proper authority, but we do not promise to challenge every demand.

Your personal data shall not be processed for purposes other than those it was collected for; should further processing be required, you will be informed of that purpose and provided with all necessary information.

Storing of data

Where we store your personal data

The security of your personal data is our top priority. The Company takes all physical, technical and organizational measures needed to safeguard your personal data. We will use all reasonable efforts to protect your information in a highly secure data center, adhering to strict computer security standards. We have put in place privacy protection control systems designed to ensure that our customers' information remains safe, secure and private.

Access to personal data is only limited to authorized personnel who are fully trained in handling your information. These authorized personnel are required to ensure the confidentiality of your information and to respect your data protection rights at all times. Personnel who have access to your information will be subjected to disciplinary action should they fail to observe this Privacy Policy and other guidelines, code of conduct or policies which we may issue to them from time to time.

The data that we collect from you may be transferred to, and stored at, via third parties for certain purposes. It may also be processed by staff who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfillment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We take all steps reasonably necessary to ensure that your data is treated securely using sufficient and appropriate safeguards and in compliance with all legal requirements as well as this Privacy Policy and our strict codes of conduct.

All personal data you provide to us is stored on our secure servers. Where we have given you a password which enables you to access certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites; any transmission is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorized access.

In line with applicable law, we shall, where lawfully obliged, notify the competent authorities and/or you in cases of personal data breach and will keep a log of any such breaches.

For how long will your data be stored?

We will process and store your personal data for as long as it is necessary in order to fulfill our contractual, regulatory and statutory obligations. We will assess and respond to requests to delete data and we shall accordingly delete data provided that the data is no longer required in order to

fulfill contractual, regulatory or statutory obligations, or the fulfillment of any obligations to preserve records according to law.

We will normally retain your records for a minimum of five years to comply with legal, regulatory and contractual requirements unless there is a particular reason to hold the records for longer; your personal data may be retained for longer periods in the event of prospective or pending debt collecting, legal or law-enforcement proceedings and until such proceedings are formally and definitively concluded.

Your rights

In relation to your personal data, you have the right to:

- access to your personal data;
- the rectification of your personal data;
- restrict processing;
- object to processing;
- data portability;
- request erasure of your personal data.

The Company will facilitate your requests to exercise your rights above, always communicating in a concise, transparent, intelligible, and easily accessible form and without undue delay.

If you want to withdraw your consent to pass personal data to specific third parties for marketing purposes, you shall write an email to our Customer Service at any time. Withdrawal of consent does not affect the legality of data processed prior to such withdrawal.

You shall have the right to object to any of the above-mentioned legitimate company interests as a basis for the processing of personal data by contacting our Customer Service. If you submit an objection, we will no longer process your personal data unless we can give evidence of mandatory or legitimate reasons for processing, or processing serves the enforcement, exercise, or defense of our company's legitimate interests.

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Access to Data

You have the right to request, free of charge, access to and a copy of your personal data as processed by us.

Automatic Decision Making

In establishing and carrying out our business relationship, we generally do not make use of fully automated decision making. If we use this procedure in individual cases, we shall inform you of this separately, provided it is a legal requirement.

Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to our Customer Service.