

# Privacy Notice

## 1. Introduction

This Privacy Notice applies to the personal data that the Company obtains and processes, where we are committed to protecting your privacy rights and securing all collected information when you use our Site and Services.

We are also committed to transparency when managing your personal data, where it is crucial that you are given the relevant information so you can make informed consent and decisions throughout your use of our Services.

This Privacy Notice contains the following:

- How we protect, process, and control all personal data relating to you
- How we obtain and store personal data from users
- To whom do we disclose your personal data
- Your rights regarding the processing of your personal data

Moreover, our Services are made available to general users who are 18 years old and above only, where persons under the said age are not authorized to use our Services. We do not knowingly allow minors to access our Site, nor do we gather and seek their information. If we discover that data from a minor has been obtained, we shall take all reasonable efforts to get it erased as quickly as practicable.

## 2. Amendment to this Policy

The terms of this Policy are subject to amendments from time to time, which shall be binding upon your continued use, effective immediately. We may but are not obliged to notify you regarding the changes, regardless of how relevant such changes are to you.

### 3. Interpretation

For the purpose of this Privacy Notice, “**data subjects**” refer to the Clients and users whose personal data has been collected and processed by the Company. In line with that, “**personal data**” means any information or document relating to the Client. The term “**user**” refers to the Client or the identified person of the relevant personal data.

“**Privacy Notice**” refers to this document that stipulates the information of handling Client data.

The term “**processing**” and “**treatment**” refer to any action done on your personal data, including but not limited to obtaining, recording, storing, modifying, amending, accessing, and using any of your information. Such processing and treatment also include disclosing your personal data through transmitting and disseminating and other actions such as combining, restricting, removing, or disposing of information.

For the purpose of this document, the term “**Services**” means the Company’s provided products, resources, and other services as offered by the Company.

“**Site**” refers to the Company’s official website.

### 4. Processing of Personal Data

#### For what purpose do we process your personal data?

Collecting and processing your personal data allow us to execute our business transactions and activities appropriately and provide you with the relevant Services. Additionally, we use it to carry out and maintain our operations, such as back-office duties, monitoring methods, commercial development, and business decision-making process.

Such processing also helps us improve our Services and enhance the user experience on our Site. Among many other purposes, we process your personal data to review any error logs and other Service-related malfunction reports.

Upon your deliberate request and processing consent, we may obtain your personal data and disclose it to third parties who will receive your contact details, which can be used for one or more purposes.

Processing your information is required when responding to your inquiries, requests, and claims related to your use of our Services.

We may also gather and treat your personal data in compliance with the applicable legal and regulatory requirements, including protecting our Company's rights and interests. In line with that, your personal data can be used to protect the relevant parties from fraud and unauthorized use of our Services.

We have the right to process your personal data for one or more specific intents. For instance, such a process can be when you have expressly provided us with information through the Site to disclose to third parties. We may also process your personal data to pursue our legitimate interests or a third party's, including filing, exercising, and defending legal rights in compliance with a legal obligation.

Furthermore, different methods are available to give you access and control over your personal data. For instance, you can contact us if you need to review or confirm your personal data, request its update or removal, limit or cease its use for a specific purpose, or request us to transfer such data to a third party.

We use various security measures consistently to protect all collected and stored personal data. However, you acknowledge that while we act according to the applicable cybersecurity standards, we cannot guarantee that your personal data will always remain uncompromised.

### **When and how do we gather your personal data?**

We receive your information when you use our Site and Services, including when you contact us through our available communication means.

You may deliberately provide us with your personal data, but we may also collect it by analyzing and monitoring your Site and Service use.

In some cases, you are not obligated to provide personal data, but a lack of Client information or documents may prevent us from granting you complete access to our Site, Services, and other facilities. In other cases, you may be obliged to provide certain information for us to deliver you the appropriate Services, complete a business transaction, or comply with a legal obligation.

## **What personal data do we collect from you?**

When you get in touch with us through our available communication means or if you fill out any of our electronic forms, we may obtain your information, such as full name, contact number, email, and address. You hereby acknowledge that we can disclose your provided name and email to the relevant third parties.

Your personal data may also be collected when you deliberately provide it through our available communication channels. For instance, in compliance with the Know-Your-Customer (“KYC”) policy, you can submit the required information or documents by sending them to our official email. Additionally, such personal data can be used for identification and verification purposes.

Every time a user visits our Site, we may collect the following information depending on the browser’s settings:

- IP addresses
- Preferred language and region
- Time of visit to Site
- Date of visit to Site
- Pages visited on the Site
- The used device’s information
- Type of used web browser
- Crash records of software

Some of the listed information above is not personally identifiable to the user, which does not qualify as personal data.

## **How long do we store your personal data?**

The Company only stores all personal data for as long as it is necessary to process such information or document. However, if a longer retention time is called for by the applicable laws, regulations, policies, or court orders, we may store your personal data for a longer time.

We review our retained data frequently to determine whether any of it is no longer needed for processing and can be deleted.

## 5. Personal Data Disclosure

You acknowledge the possibility that we can disclose your personal data to relevant third parties, including but not limited to our:

- Service affiliates and providers
- Affiliated organizations
- Business associates

Our service providers include but are not limited to:

- Web host
- Backup storage
- IP address and user analytics
- Statistical and technical services

We may also transfer your personal data to third-party Bitcoin hubs upon your request, where you understand and accept that their separate privacy terms govern their use of your personal data.

We reserve the right to disclose and transfer your personal data to local, state, federal, and regulatory bodies, counting when such disclosure is necessary to protect our rights, interests, properties, and assets.

Furthermore, we have the right to disclose your personal data to the Company's investors, buyers, and financiers, including any firm in the group of businesses where our Company belongs.

Regarding the Company's internal affairs, we are not authorized to disclose our transactions, such as merging, restructuring, consolidating, or bankruptcy, including those of our affiliates, and any transactions related to the sales and marketing operations of the Company, its committee, and affiliates. Additionally, we are not permitted to disclose the names of our investors, whether corporate or individual.

## 6. Transfer of Personal Data to International Jurisdictions

You accept that the Company may disclose and transfer your personal data to international jurisdictions or a third country, i.e., jurisdictions other than where you reside, including the jurisdiction where the Company's Terms of Use and Privacy Policy take place.

If you live in the European Economic Area ("EEA") and your personal data will be processed outside the EEA, we will take the necessary precautions to protect your data, subject to your legal rights and legal remedies.

You hereby accept that if we receive legal responsibilities and other obligations beyond our control, we have the right to disclose your personal data to the relevant third parties, such as state or federal authorities. In that case, our ability to secure your personal data may be limited.

We impose suitable security measures to protect all stored and processed personal data. These measures are taken to prevent data leaks, corruption, loss, unauthorized access, and accidental or unlawful destruction of information. However, regardless of the appropriate level of security and other safeguarding measures we implement, we cannot guarantee your personal data's absolute safety when you submit it online.

## 7. Cookies

### What are cookies?

Cookies are small text files stored on your device when accessing our Site, depending on your device or browser's settings. They serve as a memory tool to recognize your behavior and remember your actions made on the Site. These cookies make the user experience personalized, faster, and more convenient.

### What cookies do we use on our Site?

When you visit our Site, the following cookies can be stored on your device, depending on your browser's settings:

- **Session cookies** – Also known as "temporary cookies" that remember your online activities, and without these cookies, your browsing data would always be blank, or the Site would treat you as a completely new visitor. Ultimately, these cookies help the user navigate our Site by remembering your activities and expire as soon as you leave the Site.

- **Strictly necessary cookies** – These cookies allow our Site’s core functionality like secure areas, including user login and account management. For instance, such security purposes include identifying and authenticating a logged-in user and ensuring that you are connected to the Site’s appropriate Services. If you prevent these cookies, we cannot guarantee how our Site or its security will perform when you visit the Site.
- **Functional cookies** – We use these cookies to enhance our Site’s performance, where they allow us to remember important information and the user’s preferences. Such information includes language, region, and login data.
- **Performance cookies** - These cookies gather information on how you use our Site, including which pages you visit and if you encounter any errors, but they do not obtain information that could identify you. We only use performance cookies for web analytics and error management, i.e., to identify and prevent website crashes.

### **How can you remove or block cookies?**

On your device or browser’s settings, you may remove some or all existing cookies or set them to block cookies in the future. However, removing or blocking cookies may prevent you from using our Site as intended, where some features and functions might not be available.

## **8. Third-party Providers**

Our Site and other channels or platforms that we own may contain third-party materials. For instance, analytical firms and corporations run advertisements on our Site, where they may use Cookies and other data processing tools, subject to their separate privacy terms.

Before accessing third-party websites or applications and sharing your personal information, you should read their separate terms of use and privacy policy.

## **9. Rights of Data Subject**

### **Right to be informed**

The data subjects have the right to be informed when the relevant personal data will be, is being, or has been processed, hence this Privacy Notice that includes the following information:

- Description of the personal data you will enter into our system
- Purposes of processing the personal data
- Basis and significance of processing
- Scope and methods of processing the personal data
- Name of recipients to whom your personal data are disclosed, whether individual or group of receivers, including third-party jurisdictions outside of EEA
- Period of personal data retention and our criteria to establish the duration
- Rights of the data subjects, including the right to access, correction, and object

## **Right to access**

You, as a data subject, have the right to access the following upon your request:

- The contents of your personal data that we have processed
- Sources of where your personal data was acquired, including when it was not obtained from you
- Methods of how your data was processed
- Names of your personal data's recipients
- Reasons for the disclosure of your personal to recipients, if applicable
- The suitable measures related to processing your personal data when transferred to third-party jurisdictions outside of EEA
- The date when your personal data was last accessed and modified

## **Right to rectification**

You have the right to appeal modification when there is any inaccuracy or error in your personal data, where we will correct such information immediately and accordingly unless the request is made on unlawful or unreasonable grounds.

## **Right to object**

You have the right to object to processing your personal data, including processing for direct marketing and profiling. Upon your objection or withholding of consent, we will no longer process your personal data. However, we have the right to deny such objection to the process if any of the following occurs:

- The personal data is required to pursue a subpoena
- Your personal data is being obtained and processed out of legal obligation
- The purpose of collection and processing outweigh your interests, rights, and privileges to object to its processing

## **Right to erasure or blocking**

You can exercise your right to request the removal or blocking of your personal data upon substantial proof of any of the following:

- Your personal data is outdated, incomplete, inaccurate, or was unlawfully collected
- Your personal data is being used for purposes you did not consent
- Your personal data is not needed anymore for the reasons they were acquired
- You withdraw your consent to process your data, and there are no legal grounds or overwhelming legitimate interests to use it
- The collection and processing of your personal data were unlawful
- The erasure of your data is required to comply with a legal obligation, whether related to the European Union's law or a Member State relevant to the Company

However, you accept that we can revoke your right to erasure and blocking when the processing is needed for a legal basis governed by the EU or Member State legislation, including when the processing is required to pursue, exercise, or defend a legal claim.

### **Right to Data Portability**

If the personal data is processed electronically and in a valid format, you have the right to obtain a copy of your data in the same method and format. This right is for you to have control over your personal data being processed based on consent or agreement, for commercial purposes, or through automated means. You may request your personal data to be transferred directly from the Company to another controller without breaching another person's right or privilege.

### **Right to Limit Treatment**

You can exercise your right to request for the Company to limit your personal data's processing if any of the following applies:

- If we no longer require your personal data for its processing purposes, but you still need it saved to pursue, exercise, or defend legal claims
- If your personal data was processed unlawfully, but you do not intend to have it removed, request for restricted processing instead
- When you have appealed for the inaccuracy of your personal data, we need to allow a certain period to review such inaccuracy
- If your personal data is processed for direct marketing or profiling

If your request to limit your personal data's processing is based on unlawful reasons, if we cannot restrict its processing out of legal obligations, or when the Company's interests and rights override your grounds, we will continue processing it for purposes as stated herein.

Once we grant your right to restrict the processing of your personal data, we will only have it stored for the right reasons and process it with your consent to pursue, exercise, or defend legal claims. Furthermore, we will only use it to protect the rights of other natural persons or legal entities, including if it is based on the EU or Member States' public interest.

