

Privacy Policy

This privacy policy ("**Privacy Policy**") applies between users of the Platform (as defined below) (collectively, the "**Users**" and each a "**User**", and references herein to "**you**", "**your**" or "**yours**" shall be the User(s) unless the context requires otherwise) and Dederi (hereinafter collectively referred to as the "**Organization**" and references herein to "**we**", "**us**", or "**our**" are to the Company unless the context requires otherwise).

We recognize that privacy and protection of Personal Data (as defined below) are important concerns to users of the platform, website and mobile applications managed by us (hereinafter referred to as the "**Platform**"), we will treat your information in a responsible manner. The information you provide will be used to help us provide better services or protect your legal rights when necessary (among other potential purposes as outlined herein).

The purpose of this Privacy Policy is to inform you as to how we manage, collect, use, disclose and otherwise process Personal Data (as defined below). For instance, we conduct our business in compliance with applicable Data Privacy laws in the jurisdictions of our operations and have implemented various measures to ensure that any Personal Data (as defined below) we collect, use, disclose or otherwise process remains safe and secure.

Therefore, please read the terms of this Privacy Policy carefully when you visit, use, register for an account on the Platform or contact this Platform in any way. If you have any questions about the content of this Privacy Policy, please contact our Data Protection Officer (whose contact is set out below). If you do not agree with this Privacy Policy or any content therein, please stop accessing and/or using this Platform and the services ("**Services**") provided therein immediately. If you continue to use and/or access the Platform and/or the Services, you shall be deemed to have known and fully understood the meaning of all terms of this Privacy Policy, and you shall further be deemed to have accepted all of the terms of this Privacy Policy.

Please ensure that you provide a copy of this Privacy Policy (as may be amended from time to time) to any third parties whose Personal Data you provide to us.

1. Definitions

"**Data Subject**" means a natural person, whether living or deceased.

"**Personal Data**" refers to any information in respect of commercial transactions that relates directly or indirectly to a Data Subject, who is identified or identifiable from that information, or from that and other information in the possession of a data user, including any Sensitive Personal Data and expression of opinion about the Data Subject.

"**Sensitive personal data**" includes any personal data about a Data Subject's physical or mental health; sexual orientation; political opinions; religious beliefs or other beliefs of a similar nature; criminal convictions, the commission or alleged commission, of any offence.

2. Acceptance of this Privacy Policy

- 2.1 By accessing and using our Services, you signify acceptance to the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below.

We may provide additional "just-in-time" disclosures or information about the data processing practices of specific Services. These notices may supplement or clarify our privacy practices or may provide you with additional choices about how we process your data.

If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

3. Collection of Personal Data

We may collect the following types of information from you (including but not limited to):

- **Personal Identification Information:** Full name, date of birth, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.
- **Formal Identification Information:** Government issued identity document such as Passport, Driver's License, National Identity Card, State ID Card, Tax ID number, passport number, driver's license details, national identity card details, visa information, and/or any other information deemed necessary to comply with our legal obligations under financial or anti-money laundering laws.
- **Institutional Information:** Employer Identification number (or comparable number issued by a government), proof of legal formation (e.g. Articles of Incorporation), personal identification information for all material beneficial owners.
- **Financial Information:** Bank account information, payment card primary account number (PAN), transaction history, trading data, and/or tax identification.
- **Transaction Information:** Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp.
- **Employment Information:** Office location, job title, and/or description of role.
- **Correspondence:** Survey responses, information provided to our support team or user research team.
- **Audio, electronic, visual and similar information,** such as call and video recordings.

4. Purpose of collecting Personal Data

4.1 Personal Data may be collected for the following purposes:

- 4.1.1 carrying out your transactions with us, taking steps as may be directed by you, or to provide products and/or services to you;
- 4.1.2 facilitating your registration with, opening an account with and access to the Platform and/or use of our Applications and Services, including verifying and establishing your identity, and authenticating, operating and maintaining user accounts;

- 4.1.3 processing payment or credit transactions;
- 4.1.4 communicating with you;
- 4.1.5 compliance with any applicable laws, regulations, codes of practices, guidelines, or rules (e.g. Know-Your-Client checks, anti-money laundering and countering the financing of terrorism), or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority in any jurisdiction;
- 4.1.6 performing or carrying out of our functions as the approved holder of digital tokens, including issuing, administering, processing claims for and providing refunds in respect of such tokens;
- 4.1.7 fulfilment of our contractual obligations;
- 4.1.8 administrative purposes, including finance, IT and HR purposes, quality assurance and staff training, and compliance with internal policies and procedures, including audit, accounting, risk management and record keeping;
- 4.1.9 carrying out research and statistical analysis, including development of new products and services or evaluation and improvement of our existing products and services;
- 4.1.10 resolving any disputes, investigating any complaint, claim or dispute or any actual or suspected illegal or unlawful conduct;
- 4.1.11 responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- 4.1.12 to comply with any applicable laws, regulations, codes of practice, guidelines, or rules in any jurisdiction;
- 4.1.13 enforcing legal obligations owed to us, or responding to complaints, litigation or investigations concerning us;
- 4.1.14 facilitating business asset transactions;
- 4.1.15 managing your relationship with us;
- 4.1.16 such other purposes that may be informed to you when your personal data is collected;
- 4.1.17 any other reasonable purposes related to the aforesaid; and/or
- 4.1.18 any other lawful purpose (and we hereby expressly reserve all rights to collect, store, disclose and otherwise process Personal Data for any lawful purpose, even if not expressly set out in this Privacy Policy),

(hereinafter collectively referred to as the “**Purposes**”).

- 4.2 We may collect Personal Data through Users’ IP addresses and other information, such as Users’ browser properties, operating system types, and domain names of internet service providers that provide access to Users’ Personal Data, in order to optimize the Platform’s interface and operating system. By collecting the above-mentioned information, we also conduct

statistical analysis on Users' use of and/or access to the Platform and/or the Services, thereby improving management of the Platform and the quality of Services. We may also use such data to communicate with Users about other products or services provided by us or our partners.

- 4.3 When a User registers for an account with the Platform and accesses and/or uses the Platform and/or the Services, with the consent and confirmation of the User, the Platform may collect some Personal Data, including but not limited to the User's name, gender, age, date of birth, passport number (or other identification number), telephone number, mailing address, residential address, zip code, e-mail address, occupation, education level, income and other financial information, tax residency and tax identification information, marital status, family status and other information necessary for us to provide our Services including access and/or use of the Platform and/or the Services. For any entity (i.e. not a natural person) User, information collected may concern individuals connected with you (such as your directors, officers, trustees, employees, representatives, investors, members, partners, clients, beneficial owners, controlling persons and/or agents). Information may be provided in an application form, face-to-face, by telephone, by email, on an online portal, or otherwise. We may also collect information from other sources including for the purposes of "know-your-client" and other anti-money laundering, counter-terrorist financing and sanctions screening procedures, information from government or public bodies, public websites and other public sources, your advisers or from intermediaries. The provision of your Personal Data is voluntary. However, if you choose not to provide your Personal Data, we may be unable to provide or continue to provide the Services or access to and/or use of the Platform, or to fulfil your requests.

5. Personal Data protection policy

- 5.1 Unless otherwise stated in this Privacy Policy, we will not disclose Personal Data to other third parties without the consent of the User.
- 5.2 We will strictly manage and protect the Personal Data of Users. To safeguard your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of Personal Data by us, and disclosing Personal Data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
- 5.3 In order to ensure the security of Personal Data, we may entrust professional and technical personnel to perform computer processing of Personal Data when necessary to meet the needs of Personal Data security. The professional and technical personnel mentioned in this clause may have access to the Personal Data of Users when necessary.
- 5.4 Users should take all reasonable measures to protect their own Personal Data including but not limited to not arbitrarily disclosing their Personal Data, securing their account registered on the Platform and the user password, and securing their necessary computer equipment and internet connections used to access the Internet.
- 5.5 We strive to adopt various reasonable physical, electronic and management security measures to ensure that the Personal Data in the possession and/or

control of the Platform is not lost, abused or altered. We have also adopted strict management policies in respect of employees or outsourced personnel who may have access to your Personal Data, including but not limited to measures such as taking information access control, signing confidentiality agreements with such personnel who have access to the Personal Data, and monitoring the operations of such personnel. Despite security measures, we do not guarantee the absolute security of Personal Data that loss, misuse, unauthorized acquisition or alteration of your data will not occur. While security cannot be guaranteed, we strive to protect the security of your Personal Data and are constantly reviewing and enhancing our information security measures. To the maximum extent permissible under applicable laws, we will not be held liable or responsible for any loss, misuse or alteration of Personal Data that may be caused by third parties or a User's non-compliance with clause 5.4 above.

- 5.6 Please recognize that you play a vital role in protecting your own personal information. When registering with our Services, it is important to choose a password of sufficient length and complexity, to not reveal this password to any third-parties, and to immediately notify us if you become aware of any unauthorized access to or use of your account.
- 5.7 Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact our Data Protection Officer (whose contact is set out below).

6. Use and Disclosure of Personal Data

- 6.1 For any of the purposes set out in clause 3, we may transfer or otherwise disclose your Personal Data to the following persons:
 - 6.1.1 our affiliated entities;
 - 6.1.2 third party service providers and agents who provide banking, custody, brokerage, clearing, legal, accounting, audit, administrative, security, technical support, maintenance, or advisory services;
 - 6.1.3 law enforcement, officials, judicial courts and relevant governmental and/or regulatory authorities in any jurisdiction; and
 - 6.1.4 other third parties who have a reasonable need to access the Personal Data during the course and due to our normal business operation with such third party. Our contracts require these service providers to only use your information in connection with the services they perform for us and prohibit them from selling your information to anyone else. Examples of the types of service providers we may share personal information with (other than those mentioned above) include:
 - Network infrastructure
 - Cloud storage
 - Payment processing
 - Transaction monitoring
 - Security

- Document repository services
- Customer support
- Internet (e.g. ISPs)
- Data analytics
- Information Technology
- Marketing

6.2 ***International transfers of personal data.*** Where permissible, your Personal Data may be transferred to and stored by persons outside the jurisdiction of which personal data was provided. It may be transferred to and stored by our affiliates or service providers Internationally.

7. Exemptions

7.1 We shall have no responsibility or liability for any loss or damage (including but not limited to any legal costs incurred from settling legal disputes) arising from any of following situations:

7.1.1 To the fullest extent permitted by law, we do not accept liability for unintentional disclosure of your Personal Data;

7.1.2 Any leakage, loss, theft or tampering of your Personal Data, arising from your failure to properly safekeep your accounts, or informing others of your account passwords, or the sharing of registered accounts with others, and any legal disputes or consequences arising therefrom;

7.1.3 Any leakage, loss, misappropriation or tampering of your Personal Data caused by hacker attacks, computer virus intrusion or attack, and any legal disputes or consequences arising therefrom;

7.1.4 Any leakage, loss, misappropriation or tampering of your Personal Data caused by government control, equipment damage, etc. that affect the normal operation of the network, and any legal disputes or consequences arising therefrom;

7.1.5 The disclosure, loss, misappropriation or tampering of the User's Personal Data arising from your violation of clause 5.4 of this Privacy Policy.

8. Accuracy and Updating of Personal Data

8.1 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Further, when you provide us with any Personal Data relating to a third party (including your spouse, children, parents and/or employees), you represent and warrant to us that you have obtained the consent of the third party to provide us with their Personal Data.

8.2 You have the right to request correction of your Personal Data. You may request that we update and correct your Personal Data in our possession or control by contacting the Data Protection Officer (whose contact is set out below).

8.3 Upon your request under clause 8.2 above, we shall correct the Personal Data as soon as reasonably practical and without delay. A request for

rectification of Personal Data may be refused if we are unable to obtain the required information from you in order to comply with your request.

- 8.4 If we correct the Personal Data under clause 8.3 above, or are satisfied on reasonable grounds that we should not comply with the User's request to correct the Personal Information, we will notify you about the same as soon as reasonably practical and without delay.

9. Access to Personal Data and Respecting Individual's Consent

- 9.1 You have the right to request access to your Personal Data. If you wish to access the Personal Data that we have relating to you, inquire about the way in which Personal Data relating to you has been used or disclosed by us in the past year, or wish to withdraw your consent to our use of such Personal Data, you may contact our Data Protection Officer (whose contact is set out below) and we will seek to attend to your request as best as we reasonably can. We shall, on the written request of a data subject for access to Personal Data, inform the data subject (a) whether his or her Personal Data is being processed by us or on our behalf; (b) if Personal Data is being processed by us or on our behalf, communicate to the data subject in an intelligible form a description of (i) the Personal Data relating to that person which is being or will be processed; (ii) the purposes for which the Personal Data is being or will be processed; (iii) the recipients or classes of recipients to whom Personal Data is or may be disclosed; and (iv) any information available to us as to the source of the Personal Data; (c) within thirty days after the request is received, whether or not access will be given to all or part of the Personal Data. Access to Personal Data can be provided

- a) in order for us to provide any Personal Data, we will need to verify your identity and may request further information about your request;
- b) we may also refuse your request where we are legally permitted to do so and give you such reasons;
- c) you should be aware that we may take a reasonable time to process your application for access as we may need to retrieve information from storage and review the information to determine what information may be provided; and
- d) we may have to charge you a reasonable administrative fee for retrieving Personal Data relating to you, where we will first provide a written estimate of the fee to you and await your acceptance of the fee prior to proceeding with your request.

A person is entitled at any time, by notice in writing to our Data Protection Officer (whose contact is set out below), to require us within a period which is reasonable in the circumstances, to stop processing, or not to begin processing, for the purposes of direct marketing any Personal Data in respect of which the person is the data subject. For this purpose, "**direct marketing**" means the communication, by whatever means, of any advertising or marketing material which is directed to individuals.

- 9.2 Whilst we respect your decision if you decide to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our Services to you and we may terminate and close your accounts with the Platform and/or suspend or

restrict your access to the Platform, and we shall, in such circumstances, notify you before completing the processing of your request.

- 9.3 Please note that withdrawing consent shall not however affect the lawfulness of processing based on consent before its withdrawal. Also, for the avoidance of doubt, such right to withdraw consent only applies with respect to those matters which require your express consent (and would not, for example, affect our continued rights to disclose personal data to courts or regulatory, tax or other governmental authorities or to otherwise take steps to ensure continued compliance with legal and regulatory obligations and industry standards).
- 9.4 A data subject who suffers damage or distress by reason of our contravention of any of these provisions may institute civil proceedings in the court.
- 9.5 If you consider that your Personal Data has not been handled correctly, or you are not satisfied with our responses to any requests you have made regarding the use of your Personal Data, please contact the Data Protection Officer (who contact is set out below).

10. Retention of Personal Data

- 10.1 We store your personal information securely throughout your business relationship with us. We will only retain Personal Data for only if:
- a) the retention of the Personal Data continues to serve any Purpose; and
 - b) to fulfill and satisfy business, legal, regulatory, accounting, or reporting obligations and needs.
- 10.2 If retention of Personal Data is no longer necessary for any business or legal purposes or when the purpose for which the Personal Data was collected is no longer being served by the retention of the Personal Data, we will remove, destroy or anonymise the Personal Data.

11. Modification of this Privacy Policy

We reserve the right, in our sole and absolute discretion, to amend or vary this Privacy Policy at any time. We will use commercially reasonable efforts to ensure that all Users are notified of any amendments to this Privacy Policy, including posting the amended Privacy Policy on the Platform, and we will obtain your consent to the extent required by applicable laws and regulations. You should regularly check this Privacy Policy for any amendments, and your continued use and access of the Platform and/or Services after any such changes shall constitute acceptance of the latest Privacy Policy – if you do not agree to the amended Privacy Policy, you must stop accessing and using the Platform and the Services. For the avoidance of doubt, references herein to “Privacy Policy” shall include such Privacy Policy as amended from time to time by us.

12. How to contact us

Should you have any questions or complaints about our privacy practices or this Privacy Policy or wish to submit a written request to exercise your rights as detailed in this Privacy Policy, please contact our Data Protection Officer at: legal@dederi.io