

# Privacy Policy

## I. Policy Purpose

This Privacy Policy ("Policy") describes the procedures for collecting, using, disclosing, and protecting personal data from clients who use our Site and Services ("you" or "your").

This Policy addresses your privacy rights as well as how we ensure secure business operations with our clients.

By using our Services, you agree to the collection, use, and sharing of your information in accordance with this Policy.

You should not use our Services if you do not agree to any or all of the terms of this Policy, including any other agreements that govern your use of our Services.

## Definitions II

The following are definitions of terms used in this Policy:

- A. The term "Account" refers to the individual Client account you established with us in order to access and use our Services.
- B. "Cookies" are small text files or code fragments that are stored on your browser when you visit our Site.
- C. A "data subject" is an individual or group of users whose personal information we collect and process.
- D. "Personal data" refers to any information we may use to confirm the identity of the Client. Such data does not include encoded or anonymous data, or public data that has not been combined with non-public data.
- E. The term "process" or "processing" refers to all activities associated with our use of your personal data, including collection, storage, use, disclosure, restriction, erasure, blocking, and disposal.
- F. "Sensitive personal data" refers to information that qualifies as "personal data," such as a.) a person's race and personal beliefs, b.) health or social security benefits, and c.) information about administrative or criminal proceedings that are not related to pending legal proceedings.

## III. Personal Data Collection

We process the following types of personal data:

- A. Identification: your full name, username, identity cards, similar IDs, date of birth, gender, and marital status
- C. Financial: information about your bank accounts, payments, and credit cards.
- D. Technical information: your IP address, account login information, browser type, plug-ins, domain names, time zone setting, location services, operating system, personal devices, and other means by which you access our Site.
- E. Account username and profile, service preferences, and any feedback you may have provided

Some of the above-mentioned information may not be considered personal data if it is not personally identifiable to you. You agree and authorize us to use, disclose, and share your personal information with our business partners and relevant third parties.

You also understand and agree that we may use your personal data for more than one purpose if it was submitted on your own initiative or obtained with your consent. This includes allowing us to disclose your personal information to other affiliates via the Site.

Disclosing your information may be required for official corporate matters, legal compliance, protecting the rights of us and other parties involved, and further improving our Services.

In addition to collecting personal data, we do not knowingly collect information from minors, as our Site and Services are only available to users 18 and older. Users under the age of 18 are not permitted to access or use our Site or Services. If we identify a minor or unintentionally collect data from an underage person, we have the right to immediately block access and destroy the obtained data.

#### IV. Personal Data Processing

We typically collect personal data when you create an account, request support, complete a survey, contact us, or engage in other specific activities on our Site.

You will decide whether or not to proceed with any activity that requires your personal information. However, if you choose not to submit the required information, we may be unable to complete some transactions. Furthermore, for the purposes described below, we may combine your personal data with information obtained from third parties or that we already have. Any use of your personal data for purposes other than those specified in this Policy will require your permission.

We use your personal information for a variety of purposes, including:

- A. Provide, test, improve, market, and personalize our Services
- B. Offer you new Services
- C. Respond to your inquiries, requests, concerns, or comments
- D. Allow you to customize our Services and choose what you want to access or share with a third party
- E. Inform you of changes or updates to our Services, Site, or policies.
- F. Determine and analyze usage trends and campaign effectiveness.
- G. Operate and maintain the quality of our Services, as well as collect statistics on Site usage
- H. Provide technical and other support to ensure the security and efficiency of our Services
- I. Adhere to Know-Your-Customer ("KYC") policies and other relevant legal requirements.
- J. Notify you of special event-related offers and promotions, and invite you to participate in surveys based on your preferred Services.

#### Fifth-Party Disclosure

When you submit personal information to our Site, you authorize and consent to the disclosure and transfer of that information to our business partners, affiliates, or third-party vendors and service providers.

We may share your personal information with third parties for the purposes of storage, legal compliance, billing, payment processing, customer support, analytics, performance monitoring, email deployment, hosting, and data processing. Among these third parties are:

#### Affiliates of the campaign

- B. Third-party providers, including those who assist in the operation of our Site
- C. Service providers, including information technology and system administration services
- D. Bankers, auditors, lawyers, insurers, and other professionals who provide financial, legal, insurance, and accounting advice.
- E. Database and marketing service providers
- F. Providers of HR and financial systems

Providing your personal information directly to our public message boards puts your information at risk of unauthorized collection and use by others. You should read the privacy policies of each website where you submit information, including those linked to us, and understand how those websites collect, use, and share your personal information. We are not responsible for the privacy practices, activities, or contents of sites

other than our own.

Furthermore, we are not required to reveal the following information:

- A. Investors' names and contact information: individuals, corporations, or organizations
  - B. Internal operations and transactions of the company, such as mergers, restructuring, consolidation, or bankruptcy information
  - C. Business transactions: the sale, lease, exchange, consummation, or transfer of securities by the Company and its third-party affiliates.
- VI. Notification to Non-EEA Countries

We have the authority to disclose and transmit your personal data to jurisdictions other than where the Company currently operates and where you reside.

Assume you are from or currently reside in the European Economic Area ("EEA") and your personal data must be processed outside of the EEA. In that case, we will take the necessary precautions to protect your data, subject to your legal rights and remedies. When we disclose your personal information to state or federal authorities to comply with a legal obligation, our control over such processed or transmitted data may be limited.

#### Services Provided by Third Parties

Third-party services from relevant providers, such as analytical firms or businesses that develop and post advertisements on the platform, may be available on the Site. Cookies, pixel tags, and other similar technologies may be used by these third-party services, which have their own privacy policies.

#### Cookie VIII

When you visit our Site or use our mobile app, the page will prompt you to accept or decline Cookies. Accepting Cookies allows the Site to customize your online experience and allows us to collect and record your browsing information, such as the date and time of your visit, as well as how you use our Site and Services.

Please keep in mind that we do not use Cookies to run programs or applications that could harm your device. Cookies are one-of-a-kind and can only be read by our server in the domain that sent the cookie to you.

We only use Cookies to monitor how the Site is used and identify areas that may need to be improved or updated. Our Cookies may also be used to target you with advertisements based on your preferences. We use the following cookies:

- A. "Strictly Required Cookies" are required for the Site to function properly. You can use these to sign in to our portal, save your settings and language preferences, navigate between pages, and remember your previous actions from the same session.
- B. Analytics or "Performance Cookies" Cookies assist us in collecting statistical data about Site usage. Such data is required for optimizing the Site's performance.
- C. "Functional Cookies" enhance the Site's functionality for visitors. Live chat services, online videos, and social media sharing buttons are among the features available. These cookies may be set by our third-party service providers or by the Site itself, and their functionality may or may not be activated when you accept them.

D. "Advertising/Tracking Cookies" are used by our advertising partners to profile and monitor data across websites. Accepting these cookies may result in our advertisements being displayed on other websites based on your profile and preferences. Furthermore, these cookies save data on the number of visitors who viewed or clicked on our advertisements in order to optimize campaigns.

Many browsers accept Cookies by default, but you can change your browser settings to reject Cookies if you prefer. Although you can refuse Cookies on our Site, some features may not function properly or as intended.

## IX. Data Storage

We will keep your personal information for as long as it is required for processing, including to comply with legal obligations.

If you have not used our Services in a year, your account will be considered inactive, and your personal information may be deactivated or deemed obsolete.

## X. Policy Modifications

This Policy is subject to periodic changes and updates without prior notice, which take effect immediately. As a result, we recommend that you review this Policy whenever you visit the Site to stay up to date on the terms and our privacy practices.

## XI. Data Subject Rights

As a data subject, you have the following rights:

A. Right to Information: You have the right to be informed of the following: a.) the types of personal data you must provide, b.) the methods of processing your data, c.) the purposes and significance of processing your data, d.) the duration of storing your personal data and the basis for such length of period, e.) the receivers of your personal data, including individuals, groups, and jurisdictions outside the EEA, and f.) your rights as the data subject.

B. Right of access: You have the right to obtain information about how your data is being processed, such as a.) the contents of your processed personal data, b.) the date your data was last accessed and modified, c.) the source of your collected personal data, and d.) the reasons for disclosing your personal data.

C. Right to rectification: If any of your information is false, inaccurate, or outdated, you have the right to have it corrected and updated.

D. Objection: You have the right to object to the processing of your personal data.

We will stop using your data immediately if you withdraw your consent. We reserve the right, however, to continue using and storing your data if the purpose outweighs your rights and interests.

E. Right to erasure: You have the right to erasure when a.) your personal data is no longer required for its original processing purpose, b.) your personal data is being processed for purposes you did not authorize, c.) your data is false, incomplete, or outdated, d.) your data was unlawfully obtained or processed, e.) you withdraw your authorization to process your data, and there are no legal grounds or overriding reasons to use it, and if e.

F. Right to limit processing: You have the right to limit the processing of your personal data when a.) your data was unlawfully processed, but you do not intend to have it removed and instead opt for its process restriction, b.) you did not consent to the specific purpose for which it was collected, c.) your data is no longer needed for the primary reason for which it was collected, but you still need it stored for legal reasons, and d.) you requested your data's modification and we need it

G. Data portability: You have the right to request that your data be electronically moved, copied, or transferred to another controller.