

PRIVACY POLICY

1. INTRODUCTION

In this policy, **we, us, our** and **DigiCOX** refer to DigiCOX. For more information about us and how to contact us, see Section 11.

We respect your privacy and are committed to protecting it through our compliance with this Policy.

This privacy policy (**Policy**) applies when we are acting as a data controller with respect to the personal data of our users. This Policy describes how we collect, use and share personal data of consumer users across our websites, including www.digicox.com (the **Website**), DigiCOX mobile and desktop application (the **App**) and services offered to users (collectively with the Website and the App, the **Services**), and from our partners and other third parties. When using any of our Services you consent to the collection, transfer, storage, disclosure, and use of your personal data as described in this Policy. This Policy does not apply to anonymised data, as it cannot be used to identify you.

Please read this Policy carefully to understand our policies and practices regarding your personal data and how we will treat it. By accessing or using the Services, you agree to this Policy. Our Services also incorporate privacy controls which affect how we will process your personal data. Please refer to Section 5 for a list of rights with regard to your personal data and how to exercise them.

This Policy may change from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

2. PERSONAL DATA WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

There are three general categories of personal data we collect.

2.1 INFORMATION YOU GIVE TO US.

- (a) We collect your account data, which may include personal identification information such as your name, date of birth, age, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email address, and formal identification information such as Tax ID number, passport number, drivers license details, national identity card details, photograph identification cards, and/or visa information (collectively, **Account Data**). The Account Data may be processed for the purposes of providing to you our Services, satisfying anti-money laundering and know-your-customer obligations, and ensuring the security of the Services, maintaining back-ups of our databases and communicating with you. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested Services.

- (b) We process financial information such as bank account, credit card or PayPal information when you order Services in order to facilitate the processing of payments (**Payment Information**). The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.
- (c) We may process information contained in or relating to any communication that you send to us (**Correspondence Data**). The Correspondence Data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- (d) We may process information included in your personal profile, which may include your location, time zone and website (**Profile Data**). The Profile Data may be processed for the purposes of providing you a better user experience when using the Services. The legal basis for this processing is your consent.

2.2 INFORMATION WE AUTOMATICALLY COLLECT FROM YOUR USE OF THE SERVICES. When you use the Services, we may automatically process information about your computer and internet connection (including your IP address, operating system and browser type), your mobile carrier, device information (including device and application IDs), search terms, cookie information, as well as information about the timing, frequency and pattern of your service use, and information about the transactions you make on our Services, such as the name of the recipient, your name, the amount and type of cryptocurrency and timestamp (**Service Data**). The Service Data is processed for the purpose of providing our Services. The legal basis for this processing is the adequate performance of the contract between you and us, to enable us to comply with legal obligations and our legitimate interest in being able to provide and improve the functionalities of the Services.

2.3. INFORMATION WE COLLECT FROM THIRD PARTIES. From time to time, we may obtain information about you from third party sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners, and social media platforms. ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. The legal basis for the processing such data is compliance with legal obligations.

3. DISCLOSURE OF PERSONAL DATA

- 3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.
- 3.2 We may disclose Service Data to a variety of third party service providers insofar as reasonably necessary to improve the functionalities of the Services. For example, we may disclose Service Data to obtain useful analytics, provide in-app support to mobile app users, determine location data and provide search engine functionality to our users.
- 3.3 We may share aggregated data (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.
- 3.4 In the event of a dispute in P2P transaction, we may disclose some of your Personal Data with the counterparty to such transaction to the extent we deem required, in our discretion, to resolve the dispute.
- 3.5 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data if we believe that it is reasonably necessary to comply with a law, regulation, legal process, or governmental request; or in order to protect your vital interests or the vital interests of another natural person; to protect the safety or integrity of the Services, or to explain why we have removed content or accounts from the Services; or to address fraud, security, or technical issues; or to protect our rights or property or the rights or property of those who use the Services.
- 3.6 We offer individuals the opportunity to choose (opt out) whether their personal information is (i) to be disclosed to a third party or (ii) to be used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals. In order to opt out from disclosure of your personal information, please write to us at crypto@DigiCOX.com.

4. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA). We and our other group companies have offices in India, USA and Singapore. To facilitate our operations we may transfer, store, and process your information within those countries or with service providers based in Europe, India, Asia Pacific and North America. Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed outside of the EEA for the purposes described in this Privacy Policy. Where we transfer store, and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection.

Transfers to our affiliated entities, to our service providers and other third parties will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission or applicable certification schemes.

5. YOUR RIGHTS WITH REGARD TO PERSONAL DATA

In this Section 5, we have summarized the rights that you have under data protection law based on whether you are a EEA resident (a **EEA Resident**) or you are not a resident of the EEA (a **Non- EEA Resident**). Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

- 5.1 Non-EEA Residents. If you are a Non- EEA Resident, you may access and verify your Personal Information held by DigiCOX by submitting a written request to us at crypto@DigiCOX.com.
- 5.2 EEA Residents. If you are a EEA Resident, your principal rights under data protection law are:
 - (a)the right to access;
 - (b)the right to rectification;
 - (c)the right to erasure;
 - (d)the right to restrict processing;
 - (e)the right to object to processing;
 - (f)the right to data portability;
 - (g)the right to complain to a supervisory authority; and
 - (h)the right to withdraw consent.
- 5.3 As a EEA Resident, you have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can access your personal data by writing to us at : crypto@DigiCOX.com.
- 5.4 As a EEA Resident, you have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed. You can request correction or modification of your personal data by writing to us at : crypto@DigiCOX.com.
- 5.5 In some circumstances, as a EEA Resident, you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data

protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims. You can request the deletion of your account by writing to us at : crypto@DigiCOX.com.

- 5.6 In some circumstances, as a EEA Resident, you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest..
- 5.7 As a EEA Resident, you have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 5.8 As a EEA Resident, you have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 5.9 As a EEA Resident, you have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 5.10 To the extent that the legal basis for our processing of your personal data is:
- (a) consent; or
 - (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, and you are a EEA Resident, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and

freedoms of others. You can request to download your account information, by writing to us at : crypto@DigiCOX.com.

- 5.11 To the extent that the legal basis for our processing of your personal data is consent and you are a EEA Resident, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 5.12 You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this Section 5.

6. RETAINING AND DELETING PERSONAL DATA

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. If you no longer want us to use your information to provide the Services to you, you can request that we erase your personal information and close your account.
- 6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. CHILDREN

Our Services are not intended for children. You must also be old enough to consent to the processing of your personal data in your country without parental consent. No one under age 18 may provide any personal data through the Services. If you are under 18, do not use or provide any information through the Services or on or through any of their features or register an account, make any purchases through the Services, use any of the interactive features of the Services or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use.

8. COOKIES

- 8.1 About cookies
- (a) A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- (b) Cookies may be either persistent cookies or session cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session

cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

- (c) Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.
- (d) We also use other technologies with similar functionality to cookies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity, browser, and device.

8.2 We use these technologies for the following purposes:

- (a) to identify you and log you into the Services;
- (b) to store information about your preferences and to personalise the Services for you;
- (c) as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (d) to help us display content that will be relevant to you;
- (e) to help us analyse the use and performance of the Services ; and
- (f) to store your preferences in relation to the use of cookies more generally.

8.3 Cookies used by our service providers

- (a) We use the following service providers to analyse the use of the Services. Each service provider gathers information about the Services by means of cookies and this information is used to create reports about with usage information. You can find information about the service providers privacy policies and practices at the URLs set forth below:

Service Provider - Analytics Privacy Policy

Google Analytics / Fabric /
Crashlytics <https://support.google.com/analytics/answer/6004245>

Sentry <https://sentry.io/privacy/>

Mixpanel <https://mixpanel.com/legal/privacy-policy/>

Zendesk <https://www.zendesk.com/company/customers-partners/privacy-policy/>

8.4 Managing cookies

- (a) Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version.

- (b) Your mobile device may allow you to control cookies through its settings function. Refer to your device manufacturers instructions for more information.
- (c) If you choose to decline cookies, some parts of the Services may not work as intended or may not work at all.

9. DATA SECURITY

- 9.1 We have implemented measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration and disclosure. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- 9.2 Steps taken to ensure data security:
 - (a) All the user information can only be accessed by authorized users;
 - (b) Users need to authenticate themselves with a username-password combination; and
 - (c) All data is hosted on Amazon AWS servers.
- 9.3 Unfortunately, the transmission of information via public networks such as the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted through the Services. Any transmission of personal data is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the Services.

10. CHANGES TO OUR PRIVACY POLICY

- (a) It is our policy to post any changes we make to our Policy on this page. If we make material changes to how we treat our users' personal data, we will notify you by e-mail to the primary e-mail address specified in your account. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this Policy to check for any changes.

11. CONTACT INFORMATION

The data controller responsible for your personal data is DigiCOX. Please write to us at crypto@DigiCOX.com.