

Date - 20th September, 2024

PRIVACY POLICY

This website is owned by CIFDAQ BLOCKCHAIN ECOSYSTEM IND LTD ("CIFDAQ", "Company", "We", "Us", "Our",) which term shall include its parent, operators, partners, licensee, successors, subsidiaries and/or affiliates.

CIFDAQ is an Indian company engaged in the business of providing a trading platform for purchase/ sale of Virtual Digital Assets to its clients and is governed by the AML & CFT Guidelines For Reporting Entities Providing Services Related To Virtual Digital Assets 2023 as issued by the Financial Intelligence Unit (FIU) India and amendments thereof from time to time.

THIS PRIVACY POLICY ("POLICY") CONSTITUTES A LEGAL AGREEMENT BETWEEN YOU, THE USER OF THE ONLINE PLATFORMS (Associated mobile and software applications offered by CIFDAQ are collectively called "ONLINE PLATFORMS), AND US. BY REGISTERING YOUR ACCOUNT WITH US OR BY OTHERWISE VISITING / ACCESSING THE ONLINE PLATFORMS, YOU ARE HEREBY PROVIDING US YOUR EXPRESS, SPECIFIC AND VOLUNTARY CONSENT AND ALLOWING US TO USE, COLLECT, ACCESS, PROCESS, STORE, DISCLOSE, TRANSFER AND PROTECT YOUR PERSONAL DATA IN ACCORDANCE WITH THIS POLICY AND FOR THE PURPOSES STATED HEREIN.

YOU MAY BE REQUIRED TO AGREE WITH THIS POLICY, BY TICKING THE BOX NEXT TO THE WORDS "I AGREE WITH THE TERMS & CONDITIONS". IF YOU DO NOT AGREE WITH THIS POLICY, PLEASE DO NOT PROCEED FURTHER TO USE/ ACCESS THIS ONLINE PLATFORMS. YOU WILL HAVE THE OPTION TO NOT PROVIDE YOUR CONSENT, OR WITHDRAW ANY CONSENT GIVEN EARLIER, PROVIDED THAT THE DECISION TO NOT PROVIDE CONSENT / WITHDRAWAL OF THE CONSENT IS INTIMATED TO US IN WRITING.

THIS POLICY SHALL BE READ IN CONJUNCTION WITH THE TERMS OF USE ("TERMS") OF THE ONLINE PLATFORMS (AND CAPITALIZED TERMS USED BUT NOT DEFINED HEREIN SHALL HAVE THE SAME MEANING ASSIGNED TO THEM UNDER THE TERMS.

PERSONAL DATA AND SENSITIVE PERSONAL DATA

"Data Protection Law" shall mean any data protection, data security or privacy law, including, without limitation, the Information Technology Act, 2000, Digital Personal Data Protection Act 2023, EU General Data Protection Regulation 2016/679 (the "GDPR") and any laws governing Personal Data, Sensitive Personal Data or information from outbound telephone calls,

transmission of electronic mail, transmission of facsimile messages and any other communication-related data protection, data security or privacy laws.

"Personal Data" shall mean any personally identifiable information relating to an identified or identifiable individual, including data that identifies an individual or that could be used to identify, locate, track, or contact an individual. Personal Data includes both directly identifiable information, such as name, identification number or unique job title, and indirectly identifiable information such as date of birth, unique mobile or wearable device identifier, information that could be used to identify a household, telephone number, key-coded data or online identifiers, such as IP addresses, and includes any data that constitutes "personal data" under the GDPR or similar terms under other Data Protection Law.

"Sensitive Personal Data or Information" with respect to a person shall mean such personal information which consists of information relating to: (i) any detail relating to the above clauses as provided to us for providing the Service; (ii) any of the information received under above clauses by us for processing, stored or processed under lawful contract or otherwise; (iii) biometric information; (iv) financial information such as bank account or credit card or debit card or other payment instrument details; (v) medical records and history; (vi) password; (vii) physical, physiological and mental health condition; and (viii) sexual orientation.

OUR LEGAL BASIS FOR DATA PROCESSING Our processing of your Personal Data will be based on one of the following reasons, depending on the purpose of our processing activity:

1. It is necessary for the legitimate interests of our Company, without unduly affecting your interests or fundamental rights and freedoms, to provide you with communications related to our Services, promotions, offers and events. You have a right to opt-out of receiving marketing messages by clicking on the unsubscribe link in the bottom of our marketing emails;
2. It is necessary for taking steps to enter into or executing an agreement with you for the Services you request, or for carrying out our obligations under such an agreement;
3. It is essential for us to meet our legal or regulatory responsibilities both within and outside of the European Union; or
4. Processed with your explicit and free consent which we obtain from you from time to time. We ensure that your personal data is processed lawfully, fairly and in a transparent manner and is collected for specified, explicit and legitimate purposes shared with you. Any

information you provide to us that is not required, is voluntary. You are free to choose whether to provide us with the types of personal information requested, but we may not be able to serve you as effectively or offer you all our Services when you do choose not to share certain information with us.

Information We Collect

We may collect, store, use, disclose and process the following data about you

(i) Personal Information Provided by You – You may be required to give us your Personal Data (including any Sensitive Personal Data) while creating a User Account, or during your continued use of our Online Platforms. You hereby agree to provide us with accurate information, and ensure that you update them, as and where a need for the same arises.

- a. When you register, we collect personal information such as your name, email address, date of birth, nationality, gender, and any government-issued identity documents (e.g., passport or ID card) for verification purposes. We also collect phone numbers, home addresses, and other contact details.
- b. We collect and process payment information such as bank account details, credit/debit card numbers, cryptocurrency wallet addresses, transaction histories, and tax identification numbers to facilitate transactions and comply with legal obligations. We also collect proofs if any in support of you being the owner and beneficiary of a particular bank account and/or wallets used for holding virtual digital assets.
- c. Know Your Customer (KYC) and Anti-Money Laundering (AML) procedures require us to collect identification information, income proofs, and transaction details for regulatory compliance.
- d. We may collect the content of your messages, queries, and other communications with us, as well as any metadata associated with such communications.
- e. Employment or Business Information – office location, job title, and/or description of Business, role, etc.
- f. Any other information which you may provide to us when you leave us a message, during customer support conversations, surveys, or for assistance in case of matters related to law enforcement, investigations

(ii) Automatically Collected Data – We may also collect certain personal identifiers from you automatically, during your association with us:

- a. IMEI or equipment identification numbers, IMSI or subscriber identification, UUID, MAC address, OS version, device details, network operator, Wi-fi/data network connectivity, etc. Internet protocol (IP) address, your login information, browser details, time zone setting, browser plug-in types and versions, operating system and platform and other similar information. Access to your apps and services including messaging through SMS; Storage data, device details.
- b. Information related to how you interact with the Platforms, including page response times, download errors, length of visits, and user behavior such as clicks and mouse-overs.
- c. Information relating to fund transfer requests executed by you while accessing Services through our Online Platforms. In such transactions, we may collect information relating to such transactions provided by you or by a Selected Third Party.
- d. We may collect geolocation information, depending on your device permissions, to detect fraud and ensure compliance with our services.
- e. Our Online Platforms use cookies and tracking technology (including pixels) depending on the features offered. This also allows us to improve the Online Platforms and our Services. Third parties may also use such cookies and tracking technology if you interact with any content provided by them through our Online Platforms, however we endeavor to identify these cookies before they are used and afford the choice for you to accept or deny them. The information discussed here is processed for the purposes of ensuring that the Services brought to you are in order and enable us to continuously monitor and update our Online Platforms, Services.

(iii) Third-Party Data

We may receive information about you from third parties when you have voluntarily provided consent for such data sharing. We may aggregate and process this information internally for the purpose of providing and improving our services. Additionally, we collaborate with selected third parties—including but not limited to subcontractors, advertising networks, analytics providers, search information providers, and infrastructural services such as cloud hosting providers—and may receive information about you from these sources. Furthermore, we may collect and receive data in aggregated form from various browser types for analytical purposes.

If applicable, and to automate the input of Transaction ID, Reference, or UTR number associated with your deposit to the Company, we will require access to your SMS messages. This access will enable our systems to automatically retrieve and process the relevant information, eliminating the need for manual entry by you. Your explicit consent will be

obtained to access and read SMS messages, strictly limited to those containing transactional data associated with our partner entities. Should you choose to manually input the Transaction ID, Reference, or UTR number during the transfer process, you assume responsibility for any errors, including the potential failure of the funds to reflect in your Fiat Wallet due to incorrect input.

Please note that your SMS data will not be uploaded, stored, published, or shared with any remote server, third-party advertiser, or external entity, nor will it be transmitted to our internal systems or servers.

How We Use Your Information - By providing consent to this Policy, you authorize us to collect, utilize, reproduce, transmit, process, divulge, store, and safeguard your Personal Data and/or Sensitive Personal Data for the purposes of delivering the Services and/or any other stated objectives. We shall not be held accountable for the accuracy or authenticity of any personal identification information, Personal Data, Sensitive Personal Data, or other information furnished by you to us or any representative acting on our behalf. We employ your information to:

- a. To create and manage your account, facilitate transactions, and offer related services such as customer support.
- b. To meet regulatory obligations such as KYC/AML requirements, tax reporting, and fraud detection.
- c. To provide personalized content and improve user experience on our Platforms.
- d. To send important updates, promotional materials (with your consent), and respond to your queries.
- e. To analyze usage patterns and improve the functionality of our Platforms.
- f. To protect our users, Platforms, and services against fraud, unauthorized access, and potential threats.

Sharing of Your Information - You hereby grant us the consent to disclose and share the information collected from you, with such other third parties, when you have submitted such information to us directly, or where such information is received by us from a third party, based on your consent. We share your information with other third parties who provide us with services, which are essential for us to provision you with our Services. We may be required to disclose your Personal Data in the following cases:

- **With Service Providers:** We use third-party vendors for services such as payment processing, identity verification, analytics, and customer support. These vendors have

access to your personal data only to perform their services and are required to protect it.

- **For Legal Compliance:** Where we are obligated under any applicable laws or for responding to orders, direction, processes of law enforcement agencies, judiciary, governmental authorities and persons/authorities tasked to investigate (suspected) illegal activities.

Where we are in the process of detecting and preventing potential or actual occurrence of identity theft, fraud, money laundering, abuse of Services and other illegal acts;

- **In Business Transfers:** In the event of a merger, acquisition, or sale of our assets, your personal data may be transferred to the new entity.

Cross-Border Data Transfers

To effectively conduct our global operations, your Personal Data may be transmitted to and retained in countries outside the European Union ('Alternate Country') by us or our affiliated entities/partners situated in foreign jurisdictions. We will only undertake such transfers when they are legally permissible and necessary to fulfill our contractual and statutory obligations. The Personal Data that may be transferred abroad is subject to applicable laws governing international data transfers. By acknowledging this provision, you consent to the transfer of your Personal Data to Alternate Countries.

When we transfer your Personal Data from your Home Country (the country, state, and city where you are located) to an Alternate Country (another country, state, and city), we will adhere to our legal and regulatory obligations concerning your Personal Data. This includes establishing a lawful basis for data transfers and implementing appropriate safeguards to ensure adequate protection for your Personal Data. We will also guarantee that the recipient in the Alternate Country is obligated to safeguard your Personal Data at a level of protection comparable to that provided under applicable laws.

Our lawful basis for such transfers will be either based on your consent or one of the safeguards permitted by applicable laws. We also rely on decisions from the European Commission that recognize certain countries and territories outside the European Economic Area as providing an adequate level of protection for personal information.

Your Rights

You may deal with your personal data available with us in the following ways:

- **Access:** You can request access to the personal data we hold about you in a structured, commonly used and machine readable format (or, when this is possible, ask for such personal information to be communicated on your behalf to another data controller);
- **Rectification:** You can request corrections to inaccurate or incomplete data to us in writing.
- **Erasure:** You can request that we delete your personal data under certain circumstances.
- **Restriction of Processing:** You can request that we limit how we process your data.
- **Data Portability:** You have the right to receive your data in a structured, commonly used format.
- **Objection:** You can object to our processing of your personal data for certain purposes, including direct marketing.
- **Withdraw Consent:** If you have provided consent for any data processing activity, you can withdraw this consent at any time.

To exercise your data rights, please submit a request through our app at support@cifdaq.in. While most inquiries and requests can be processed promptly, complex requests may require additional time for research and evaluation. We reserve the right to charge a reasonable fee for processing certain data access requests

Data Retention

We will retain information and data provided by you for as long as your User Account remains active, or as required for dispute resolution, investigations, legal proceedings related to suspicious or illegal transactions, enforcement of agreements, or compliance with applicable laws. The retention period may be extended in accordance with legal mandates and will be limited to the duration necessary to fulfill these purposes.

We disclaim any warranties and shall not be liable for the non-availability or non-retention of any information or data provided by you after the deletion of your User Account.

While we employ best efforts to permanently erase your Personal Data upon the conclusion of its retention period, residual data may persist within our systems. Such data is considered beyond use and inaccessible to our employees. However, it may be subject to retention for legal compliance, dispute resolution, enforcement of our terms, and protection of our rights.

Data Security

We employ a comprehensive suite of technical and organizational safeguards to shield your collected information from unauthorized access, accidental loss, or other unlawful activity. These safeguards align with the requirements of applicable data security laws and regulations. This includes, but is not limited to, the implementation of firewalls, robust encryption protocols, and comprehensive disaster recovery plans. All information you provide is stored on our secure servers designed to minimize risks of unauthorized access.

We strongly advise against sharing your password with anyone. Additionally, it is crucial to maintain secure user account practices consistent with general internet security protocols. This includes exercising caution in public areas, avoiding leaving your device unattended while logged in, and employing reputable malware and virus protection software.

You acknowledge that data transmission over the internet inherently carries some level of inherent risk. Despite our best efforts to secure your Personal Data, we cannot guarantee absolute security or warrant against potential breaches due to malicious attacks, errors, omissions, or other unforeseen circumstances. We hereby disclaim any liability arising from such security breaches or unauthorized access to data transmitted through our online platforms.

Should you suspect any misuse, unauthorized access to, or loss of your personal information, please notify us immediately. You can report the incident through our dedicated support channels:

- **Mobile App:** support@cifdaq.in
- **Website:** support@cifdaq.in

We will thoroughly investigate the matter and promptly update you on the next steps.

We may periodically engage third-party security specialists to conduct independent evaluations of our security protocols. We also implement strict access controls, granting access to your Personal Data only to authorized personnel on a strict "need-to-know" basis.

Cookies and Tracking Technologies

We use cookies, web beacons, and similar technologies to enhance your experience on our Platforms. You can manage cookie preferences through your browser settings. Third-party services such as Google Analytics may also use cookies to collect and analyze data on our behalf.

Children's Privacy

Our Platforms and Services are exclusively intended for individuals who are 18 (eighteen) years of age or older. We strictly prohibit the use of our services by minors. Without the explicit consent of parents or legal guardians, we do not knowingly collect Personal Data from individuals under the age of 18 (eighteen).

Changes to this Policy

We may update this Privacy Policy periodically to reflect changes in applicable laws or business requirements. We will provide you with reasonable notice of any significant changes. We encourage you to review the Policy regularly for the most current information on our privacy practices. Your continued use of the Online Platforms constitutes your agreement to the terms contained herein and any amendments thereto.

Grievance officer and Data Protection Officer

Please address Your grievances, feedback or questions, without limitation, with respect to the collection, processing, usage, disclosure, security of Your information or on any element of this Policy; or Your intention to exercise one of Your data protection rights in writing to at grievances@cifdaq.in. or to the Data Protection Officer at dpo@cifdaq.in:

To,

Data Protection Officer,

Re: Privacy Policy

Details of issue with evidence if any: