

July 2023

PRIVACY POLICY

This website is owned by Primestack Pte. Ltd. ("**Company**", "**We**", "**Us**", "**Our**") which term shall include its operators, Partners (*as listed hereinbelow*), licensee, successors, subsidiaries and/or affiliates.

As Partner operator, Neblio Technologies Pvt. Ltd. is an Indian company registered with the Financial Intelligence Unit bearing No. VA00030982 and exchange and allied services to Indian User(s) only is provided by this Partner entity.

As another Partner operator, Oystex UAB is a Lithuanian private limited company with registration number 306162453, with registered office at Laisvės Ave. 60' Vilnius, Lithuania, registered with the State Enterprise Center of Registers of the Republic of Lithuania as a provider of activities of a virtual currency depository wallet operator and virtual currency exchange operator in accordance with the applicable laws of the Republic of Lithuania and all crypto transmission services are being offered by this Partner entity.

THIS PRIVACY POLICY ("POLICY") CONSTITUTES A LEGAL AGREEMENT BETWEEN YOU, THE USER OF THE 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, 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 AND HOW WE COLLECT IT

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

- a. Information You Give Us – 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.

We receive the following information directly from you, thereby enabling you to make use of our Online Platforms:

- (i) Identification Details – Name, date of birth, nationality, gender, Photograph, etc. which are used for the purposes of registering your valid profile with the Online Platforms.
- (ii) National Identifiers – Any government issued identity card details, is used for the purposes of mapping your identity with the profile so created and registered with, by you.
- (iii) Correspondence Details – E-mail Address, Phone Number, Postal Address, which are used for the purposes of communicating with you, resolving your queries and provisioning of other support services. In case you participate in our surveys, you may also provide us with additional information of your own accord.
- (iv) Financial Data – Bank Account Details, permanent account number, credit or debit card number, transaction history, trading data, UPI, tax identification details, Digital Assets information including but not limited to any wallet address or details, which are used for the purposes of enabling and effecting transactions on the Online Platforms.
- (v) Location Data – we may seek your location data for providing certain Services or in order to enable you to access certain features of the Online Platforms or in the event we suspect any fraudulent transactions.
- (vi) Transaction Information - Information about the transactions by using the Online Platforms, such as

the name of the recipient, digital currency address, your name, the amount, and/or time-stamped.

- (vii) Employment or Business Information – office location, job title, and/or description of Business, role, etc.
 - (viii) 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.
- b. Information We Collect About You – We may also collect certain personal identifiers from you automatically, during your association with us:
- (i) Technical information: 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.
 - (ii) Access to your apps and services including messaging through SMS; Storage data, device details.
 - (iii) Information about your visit: Uniform Resource Locators (URL) clickstream with timestamp; transactions and trades executed or attempted to be executed by you; viewed and searched items; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
 - (iv) 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.
 - (v) Metadata is usually technical data associated with the content you submit, post or share on the Website. Users can add or may have metadata added to their content including geolocation, date, attribution, or other data.
 - (vi) 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.

- c. Information We Receive from Third Parties – We may receive information about you from third parties if you have volunteered/ consented for such information to be shared with us. We may combine and process such data internally towards our Services. We also work closely with select third parties (including, for example, subcontractors such as advertising networks, analytics providers, search information providers, infrastructural services, including cloud service providers) and may receive information about you from such sources. We may also collect and receive information in an aggregated form from different browser types for analysis.
2. If applicable and in order to automate input Transaction Id/ Reference/UTR number linked with Your deposit to the Company, we will need access to your SMSs, for our systems to be able to read and proceed with auto-input instead of the same being manually entered by You. Your explicit consent to read Your SMSs in order to extract the Transaction Id/ Reference/UTR number (s) will be sought. Please be advised that our systems are restricted to read only transactional SMS with the keyword -partner entity name. In the event, you decide to proceed manually with inputting Transaction Id/ Reference/ UTR number as you proceed with the money transfer in your wallet, you accept the responsibility for any manual error that may result in the failure of transferred money not reflecting in Your Fiat Wallet. Your SMS data will not be uploaded, published, or shared with any remote server, external ad agency, or third party or be uploaded to our

systems, or servers.

HOW WE TREAT YOUR INFORMATION

1. By providing consent under this Policy, you grant us the permission to collect, use, copy, transmit, process, disclose, store and back-up your Personal Data and/or Sensitive Personal Data for purposes of the Services and/or for any other purpose mentioned below. We shall not be responsible for the authenticity of the personal identification information, Personal Data, Sensitive Personal Data or any other information supplied by you to us or any other person acting on our behalf. We use your information:
 - a. to create and register your User Account with us, and maintain your records and profile details, and authenticate such information;
 - b. to inform you of promotions, offers, surveys, events, products and services, which may be of interest to you;
 - c. to facilitate and provide the services offered through the Online Platforms.
 - d. to carry out our obligations arising from any contracts entered into between the Company and you;
 - e. to enhance the security of our Online Platforms;
 - f. to personalize content/Services offered to you;
 - g. to facilitate transactions related to Digital Assets;
 - h. to provide you, or permit selected third parties to provide you;
 - i. for KYC verification of the details of Tax Identification Details and other Identification documents provided by you. We may seek you to validate such information by way of OTP, or by having a third-party service provider to authenticate and validate such information, only with your consent hereunder.
 - j. to prevent and identify suspicious /other illegal transactions in order to mitigate risks relating to money laundering and other illegal activities, and discharge any other duties and obligations under the applicable laws
2. We may transfer your Personal Data if we are acquired by or merged with another company. In such an event, we will notify you and take your prior consent before your Personal Data is transferred and becomes subject to a different privacy policy.

DISCLOSURE AND SHARING OF YOUR INFORMATION

1. 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.
2. We may be required to disclose your Personal Data in the following cases:
 - a. 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;
 - b. 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;
 - c. Responding to claims that an advertisement, posting or other content violates the intellectual property rights of a third party;
 - d. Under a duty to disclose or share your personal data in order to enforce or apply our Terms and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with third parties for the purposes of fraud protection and KYC verification.

CROSS BORDER TRANSFERS

1. To facilitate our global operations, your Personal Data may be transferred to and stored in locations outside of the European Union ("**Alternate Country**") by us or our Affiliates/Partners located in foreign jurisdictions. We will do this only when the transfer is lawful, and only when the same is required for us to meet our contractual and statutory obligations. For completeness, the Personal Data which may be transferred outside is such information which may be sent to foreign jurisdictions as per the applicable laws. You hereby confirm that you have noted the aforementioned provisions and accordingly consent to the same.
2. When we transfer your Personal Data from your Home Country (country, state and city in which you are present) to the Alternate Country (another country, state and city), we will comply with our legal and regulatory obligations in relation to your Personal Data, including having a lawful basis for transferring Personal Data and putting appropriate safeguards in place to ensure an adequate level of protection for the Personal Data. We will also ensure that the recipient in Alternate Country is obliged to protect your Personal Data at a standard of protection comparable to the protection under applicable laws.
3. Our lawful basis for such transfer will be either on the basis of consent or one of the safeguards permissible by the applicable laws. We also rely on decisions from the European Commission where they recognise that certain countries and territories outside of the European Economic Area ensure an adequate level of protection for personal information.

DATA SECURITY PRECAUTIONS

1. We have in place appropriate technical and security measures to prevent unlawful access to or accidental loss of information collected including those prescribed under applicable laws. We do this by having in place a range of appropriate technical and organisational measures, including firewalls, encryption measures and disaster recovery plans. All information you provide to us is stored on our secure servers. We ask you not to share your password with anyone, and to follow general internet etiquette in operating your User Account with us. In public areas, you should exercise caution and not leave your computer/device unattended especially whilst logged into your User Account. The use of established malware and virus protection software and apps for your device is recommended.
2. Please remember that if you post any of your Personal Data in public areas of the Online Platforms, such information may be collected and used by others over whom we have no control.
3. You understand and acknowledge that any transmission through the internet is not completely secure and is at your own risk. However, we will do our best to protect your personal data, we cannot guarantee or give any warranties in this regard, and hereby disclaim all liabilities for any breach of security, malicious attacks, error, omission or commission concerning the data transmitted through the Online Platforms or leading to a breach of data or information of the User.
4. If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately. Please raise your concern on the app at [dcxgo://go.coindcx.com/chatBot](https://go.coindcx.com/chatBot) or on the web support.coindcx.com, in the first instance, and we will investigate the matter and update you as soon as possible on next steps.
5. We also may subject ourselves to regular checks by third party security evaluation specialists and restrict access to your Personal Data by our personnel on a need-to-know basis only. Once we have received your Personal Data, we will use strict procedures and security features to try to prevent, as far as is reasonably possible, unauthorized access to your Personal Data.

DATA RETENTION AND STORAGE

1. Notwithstanding anything contained herein or in the Terms, we retain any information and/or data provided by you for as long as your User Account is active, for resolution of disputes, for the purpose of investigations or ongoing prosecutions or in case of any suspicious/illegal transactions, for enforcement of any agreements, and/or as necessitated under applicable laws. The retention period may be extended in accordance with the applicable law and shall only be for such a period that is absolutely necessary for us to comply with the law, and provision our Services to you.
2. We make no warranties and shall not be liable regarding non-availability or non-retention of any information and/or data provided by you beyond the deletion of your User Account.
3. While we will endeavour to permanently erase your Personal Data once it reaches the end of its retention period, some of your Personal Data may still exist within our systems, for example if it is waiting to be overwritten. For our purposes, this data has been put beyond use, meaning that, while it still exists in the electronic ether, our employees will not have any access to it or use it again. This is subject to retention for purposes of complying with applicable laws, resolving disputes, enforcing the terms of our Policy and protecting our rights.

CHILDREN'S PERSONAL DATA

Unless otherwise indicated, you are only allowed to use our Online Platforms and Services if you are over the age of 18 (eighteen) years. We do not knowingly collect Personal Data from individuals under 18 (eighteen) years of age, without the consent of the parents/legal guardians or unless the information is provided to use by the parents or legal guardian.

USE OF COOKIES AND SIMILAR TECHNOLOGY

1. We may automatically track certain information about you based upon your behaviour on our Online Platforms or while accessing our Services. You agree that we may use such information to do internal research on our Users' demographics, interests, and behaviour to better understand, protect and serve our Users. This information is compiled and analysed on an aggregated basis.
2. The Platform uses cookies to distinguish you from other Users of the Online Platforms. This helps us to provide you with a good experience when you browse the Online Platforms and also allows us to improve the Online Platforms. By continuing to browse the Online Platforms, you are agreeing to our use of cookies. Usage of a cookie is in no way linked to any personally identifiable information on our Online Platforms.
3. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer and of your other device if you agree. Cookies contain information that is transferred to your computer's hard drive.
4. Please note that third parties (including, for example, advertising networks and providers of external services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.
5. We may use certain third party web analytics services on the Online Platforms such as Google Analytics tools offered by Facebook and/or LinkedIn which may use technologies such as cookies, web server logs and web beacons to collect information and help us analyze how visitors use the Online Platforms. These analytic services may use the data collected to contextualize and personalize the marketing materials of their own advertising network.

6. Google Analytics is a web analysis service provided by Google Inc. ("Google"), in accordance with its policies: <http://www.google.com/policies/privacy/partners/>. You can prevent Google's collection and processing of data by using the Google Ads Settings page or by downloading and installing its browser plug-in. (<https://tools.google.com/dlpage/gaoptout>).

7. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of the Online Platforms or avail of our Services. You further agree that if you send us personal correspondence, such as emails or letters, or if other Users or Third Parties send us correspondence about your activities or postings on the Online Platforms, we may collect and/or store such information.

THIRD PARTY LINKS

Our Services and Online Platforms may contain links to third party applications/websites. Please note that when you click on one of these links, you are entering another application/website over which we have no control and will bear no responsibility. We do not own or control these third party applications and when you interact with them you may be providing information directly to them or us or both. Often such a third party application/website will require you to enter your Personal Data, and use/collect your Personal Data, in accordance with its own privacy policy and standard practices. You are requested to exercise your own discretion in this regard and you agree that we shall not be liable for any breach of your privacy of Personal Data or loss incurred by your use of these applications/websites.

YOUR RIGHTS

1. You may deal with your personal data available with us in the following ways:
 - a. to check whether we hold Personal Data about you and to access such data;
 - b. to ask for a copy of 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);
 - c. to require us to correct when communicated to us by you in writing, as soon as reasonably practicable any data relating to you that is inaccurate or deficient;
 - d. to ascertain our policies and practices in relation to Personal Data held by us;
 - e. to object to the use of your Personal Data where we do so for one of the following reasons (i) because it is in our legitimate interests to do so; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; or (iv) for scientific, historical, research, or statistical purposes.
 - f. right to withdraw consent, where we have obtained your consent to process your Personal Data for certain activities; and
 - g. to ask us to erase and forget your Personal Data.
2. You may exercise the above rights by sending us requests for the same on the app at [dcxgo://go.coindcx.com/chatBot](https://go.coindcx.com/chatBot) or on the web support.coindcx.com. While the majority of questions and issues related to access or requests can be handled quickly, complex requests may take more research and time. We reserve the right to charge a reasonable fee for processing any data access request(s).
3. The Company may retain all or some of your data in accordance with our policies in force or as per applicable law.

RIGHT TO OPT-OUT

We cannot utilize your Personal Data and/or Sensitive Personal Data (to provide you with access to our Online Platforms and process any application to avail Services from us) without your consent and request that you provide the same by NOT ticking the OPT-OUT box on our Online Platforms sign-up page or in the "Settings" section of the Online Platforms. If you decide to tick the 'Opt-out' box, you are indicating that you DO NOT wish for us to use your Personal Data in direct marketing and DO NOT wish to receive direct marketing materials by phone, SMS, mail, email, fax or any other communication channels and DO NOT wish for us to provide your Personal Data to any other persons for their use in advertising and marketing, whether or not such persons are members of the Company except where you have applied for or will apply for any Service that is provided by us jointly with a co-branding partner, such Opt-Out will not apply to such co-branding partner to whom you have consented or shall consent to the provision of your Personal Data separately.

SERVICE PROVIDERS

1. We may use a variety of third party service providers to help us provide our Services. Service providers may be used, including without limitation: (a) to authenticate your identification information and documents to process your payments; (b) to check information against public databases; (c) for fraud prevention and risk assessment; (d) to allow the provision of Services through third party platforms and software tools; (e) to provide customer service and for marketing, and (f) to process and handle claims.
2. The third party service providers shall have limited access to your Personal Data for performance of the above tasks and in accordance with our strict directions and policies.

NON-PERSONAL INFORMATION COLLECTED BY US

1. Non-personal data or information is information that does not personally identify you. When you visit and interact with our Online Platforms or third parties with whom we have contracted to provide services, non-personal information, like a list of website pages visited by you, domain name, areas of the site you visit, URL, etc. could be collected to enhance your online experience by understanding your web usage patterns.
2. We may use or disclose non-personal information for any purpose from time to time, for instance, we may embed email addresses with images. In such cases where we combine non-personal information with personal information, the combined information will be treated by us as personal information as per this Policy.

DATA PROTECTION

1. We will: (a) comply with all applicable Data Protection Laws and standards in relation thereto/to your Personal Data and ensure that no act/omission of ours causes a breach thereof; and (b) immediately report theft or loss of Personal Data.
2. Any Personal Data collected or accessed by us shall be limited to that which is necessary to perform our obligations in relation to the Services offered on by us or to fulfil any legal requirements. We shall not share any Personal Data that is collected or possessed by us with any third party for any reason except as expressly stated in this Policy.
3. You agree that other than as stated in this Policy, we shall have the right to collect and/or use or analyse the Personal Data on an anonymised basis and in no way shall the Personal Data be used in a way that can lead to or reveal your identity. We advise you not to include Sensitive Personal Data in any emails you may send to us. Please do not send credit/debit card numbers or any other Sensitive Personal Data to us via email.

CHANGES TO THE POLICY

We may update this Policy from time to time when required by the applicable law or due to business reasons and provide you with notice of the same. We encourage you to periodically review the Policy for the latest information on Our privacy practices. Continued use of the Online Platforms constitutes agreement of the User to the terms contained herein and any amendments thereto.

SEVERABILITY

If any term or provision of this Policy is held by a court of competent jurisdiction to be invalid, void or unenforceable, the remainder of the terms and provisions of this Policy shall remain unaffected, and in full force and effect.

NOTICES

We may provide any notice to you under any of our policies by sending a message to the email address then associated with your User Account. Notices we provide by email will be effective when we send the email. It is your responsibility to keep your email address current. To give us notice under any of our policies, you must contact us by email, overnight courier or registered mail to the mailing address listed below. Notices to us must be sent details to grievances@coindcx.com or to any other email address notified by email to the User by us, or by electronic communication via the Online Platforms from time to time for such purpose. Notices provided by overnight courier will be effective 1 (one) business day after they are sent. Notices provided by registered mail will be effective 3 (three) business days after they are sent.

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@coindcx.com.

or to the Data Protection Officer at dpo@coindcx.com:

To,
Data Protection Officer,
Re: Privacy Policy

Details of issue with evidence if any