

# PRIVACY POLICY

This privacy policy ("Policy") outlines your choices and our practices concerning your Personal Information (as defined below). In this Policy, "we," "us," "our," and the "Company" refer to CoinLock Protector LLC, registered under number 3277 LLC 2023, with its office located at Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, Saint Vincent and the Grenadines.

As this Policy is an integral part of the Terms of Use, capitalized terms used herein have the same meanings as defined in the Terms of Use.

This Policy outlines the elements of the Platform and Services that may impact your privacy and personal information, detailing how we process, collect, manage, and store such information, along with your rights.

This Policy does not extend to information you may submit to third-party websites or mobile applications that may link to or be linked from the Platform. We bear no responsibility for the actions or privacy practices of such third-party websites and applications. For their privacy practices, please refer directly to those websites and applications.

## GENERAL

For the purpose of this Policy, "Personal Information" means any information relating to an identified or identifiable individual. This also includes information relating to your use of our Platform and Services. By accessing or registering on the Platform you accept our rules and policies which set out how we handle your Personal Information, and you understand we may collect, process, use, and store your Personal Information as described in this Policy. If you do not agree with this Policy, you should not proceed to access the Platform or use our Services.

We are dedicated to safeguarding the privacy and security of Personal Information entrusted to us by Users. To ensure transparency and compliance with applicable data protection laws and regulations, we adhere to the principles of Personal Information processing. These principles include processing data in a lawful, transparent, and fair manner, collecting and utilizing data only for specific and legitimate purposes, minimizing the amount of data collected, ensuring the accuracy and currency of data, limiting the retention period of data, implementing robust security measures to protect against unauthorized access or disclosure, and maintaining accountability for all data processing activities. It is important to note that these principles guide our approach to Personal Information processing, and we continuously review and update our practices to ensure ongoing compliance with evolving legal and regulatory requirements.

## INFORMATION COLLECTION AND USE

We gather and utilize various types of information about you to ensure the seamless functioning of our Platform and to provide you with an optimal user experience. Here's a detailed breakdown of the information we collect and how we use it:

1. Information Provided by you. When you interact with our Platform, you may provide us with the following details:
  - Full name
  - Mailing address
  - Phone number

- Email address
- Date of birth
- Place of living
- Social media and messaging platform details
- Optional biographic and demographic information

This information is essential for us to deliver our Services, fulfill contractual obligations under our Terms, and comply with legal requirements.

1. Information Collected Automatically. Upon accessing our Platform, certain information is automatically collected or generated, including:
  - Identifiers such as IP address, device and app ID, unique ID, location data, and device information (e.g., model, brand, operating system)
  - Cookies. We use cookies and similar technologies to ensure the functionality of the Platform, enhance user experience, and personalize content. You have the option to manage your cookie preferences.
  - Interaction data. This includes timestamps of events, page view statistics, referral URLs, ad data, transaction history, and web log information.

These automated data collection methods help us optimize the Platform and tailor it to your needs.

1. Information Received from Third Parties. We may receive information from external sources to improve our Services and enhance your user experience:
  - Social media: When you engage with our Platform through social media platforms, we may collect personal information such as your account ID, username, and post content. Additionally, if you log into your Account via a social networking service, certain information may be shared between us and that service.
  - Analytics: We integrate third-party analytic software to gain insights into user activity and optimize our features. However, this information remains anonymous and cannot be linked back to individual users.

We do not collect any special categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

## **PROCESSING GROUNDS**

We collect and use your Personal Information on the following grounds:

- Legitimate Interests. We may process your information when it is necessary for our legitimate interests or those of a third party, provided your interests and fundamental rights do not override those interests. Examples include fraud prevention, network and information security, and identifying potential criminal activities or threats to public security.
- Contractual Obligations. We use your information to fulfill our contractual obligations to you, including granting you access to the Platform and providing support services when you reach out to us for assistance. This ensures smooth interaction and resolution of any queries or complaints.
- Legal Compliance. In order to defend the Company against legal claims or disputes, enforce our Terms, and comply with legal obligations, we may process relevant

information, including data provided by you, automatically collected data, and information obtained from third parties.

- **Explicit Consent.** We may process your Personal Information if we have obtained your explicit consent. By registering with the Platform, you consent to the processing of your information as outlined in this Policy. This may include serving you with targeted advertisements, fulfilling marketing purposes, and identifying you for various purposes.

## **DISCLOSURE OF PERSONAL INFORMATION**

Here's a detailed outline of who we may share your Personal Information with:

1. **Vendors and Service Providers.** We may share your Personal Information with vendors and service providers who assist us in providing the service. This includes:
  - Cloud service providers for data storage.
  - Analytics providers to understand our user base.
  - Advertising partners for serving ads within the Platform and measuring their effectiveness. Advertising identifiers and user interests may also be shared for personalized advertising.
1. **Partner Exchanges.** These processors handle your information and may use it for their own purposes according to their privacy policies. Please refer to their individual policies for more information.
2. **KYC Providers.** Third-party providers may be engaged for user identification and verification purposes. They typically act as data processors based on processing agreements.
3. **Law Enforcement and Legal Requirements.** Information may be disclosed to law enforcement agencies, public authorities, or judicial bodies if legally required or in good faith belief to comply with legal obligations, enforce our Terms, detect or prevent security issues, or protect the rights, property, or safety of us, our users, or the public.
4. **Corporate Transactions.** In the event of a merger, acquisition, bankruptcy, or other corporate transaction, your Information may be disclosed as part of that transaction.
5. **Third-Party Platforms.** If you access the Platform through Third Party Services, those services may collect additional information about you according to their own terms and privacy policies. The practices outlined in this Policy do not apply to Third Party Services, and links to them do not imply our endorsement or review of those services.

## **INTERNATIONAL TRANSFERS**

Your Personal Information will be processed by our employees and service providers on servers located in the European Union (EU). However, it may also be transferred to and maintained on computers located outside of your jurisdiction, where data protection laws may differ. Your consent to this Policy constitutes agreement to such transfers.

We will take all reasonable steps to ensure your data is treated securely and in accordance with this Policy, and transfers will only occur to organizations or countries with an adequate level of data protection. If you are an EU, European Economic Area (EEA), or UK resident, your Personal Information may be processed by recipients outside of these areas. In such cases, we will ensure that adequate protection is provided through Standard Contractual Clauses approved by the European Commission and other appropriate safeguards in compliance with GDPR and UK GDPR. This ensures that any third-party processing of Personal Data collected from individuals within the EU, EEA, or UK is consistent with applicable legislation.

## **STORAGE DURATION**

We commit to storing your Personal Information only for the duration required for the purposes outlined in this Policy and as allowed by the relevant laws. Should you withdraw your consent for the processing of your Personal Information, and if we lack alternative legal grounds for its retention, we will promptly erase your data. Deleting your Account, thereby terminating your use of the Platform, signifies the withdrawal of consent for the processing of Personal Information.

Nevertheless, we will retain and utilize your Personal Information as necessary to fulfill our legal obligations, such as regulatory requirements, resolving disputes, and upholding our legal agreements and policies. Upon the completion of the purposes for which your Personal Information was initially collected or processed, we will take appropriate measures to delete or anonymize the data. These actions may encompass removing it from active databases and systems, deleting electronic records, shredding physical documents, and ceasing all associated data processing activities.

## **PERSONAL INFORMATION RIGHTS**

Under specific circumstances, you possess rights under data protection laws regarding your Personal Information. These rights encompass:

- The right to access: You have the entitlement to be informed whether your Personal Information is being processed, to receive details about the processing of personal data, and to request a copy of the Personal Information being processed. Additionally, you have the right to obtain information about both public and private entities with whom we have shared data. However, this right is not absolute; for instance, we cannot disclose trade secrets or provide information about other individuals.
- The right to rectification: You have the right to have any inaccuracies or incompleteness in your Personal Information corrected.
- The right to erasure: You can request the deletion of your Personal Information. Nevertheless, we may need to retain certain aspects of your Personal Information where there are valid legal grounds to do so under data protection laws.
- The right to object to processing: You have the right to object to our processing of your Personal Information.
- The right to restriction of processing: You can request that we limit the processing of your Personal Information.
- The right to portability: You have the right to receive a copy of your Personal Information in a structured, commonly used, and machine-readable format, or to request its transfer to a third party.
- The right to withdraw consent: You have the right to withdraw any previously provided consent for the processing of your Personal Information.

Please be aware that we may require you to verify your identity before addressing such requests. Additionally, note that we may be unable to provide Services without certain necessary information.

For Brazilian residents, please refer to ANNEX – Brazil Privacy Rights.

## **COOKIES**

Cookies are text files containing small amounts of information that are placed onto your device when you visit a website. They are widely used in order to make websites work, or work more

efficiently, as well as to provide information to the owners of the website to generally improve the User experience, for example, by remembering your preferences, or by offering you personalized content and advertisement.

Functions usually performed by a cookie can also be achieved by other similar technologies, such as log files, pixel tags, web beacons, clear GIFs, and device IDs. In this Policy, we will be referring to them collectively together as “Cookies”.

We may use Cookies to:

- verify log-in information
- track traffic flow and patterns of travel in connection with the Platform;
- understand the total number of Users of the Platform on an ongoing basis and the types of devices;
- monitor the performance of a Service to continually improve it;
- customize and enhance your online experience;
- provide customer service to you; and
- serve third parties’ adverts within the Platform.

The types of Cookies used by us and our partners in connection with the Platform can be classified into these categories: ‘Necessary Cookies’, ‘Functionality Cookies’, ‘Analytics Cookies’, and ‘Advertising and Tracking Cookies’. We have set out below some further information about each category, purpose, and duration of the Cookies we and third parties set. You may change your Cookie preferences or withdraw consent and disable Cookies at any time by using the Privacy Settings, but this may affect how the Platform functions.

- **Necessary Cookies.** Necessary Cookies enable core functionality such as security, network management, and accessibility.
- **Functional Cookies.** Functional Cookies record information about choices you have made and allow us to tailor a Service to you. These Cookies mean that when you continue to use or come back to the Platform, we can provide you with our Services as you have previously asked for them to be provided. For example, these Cookies allow us to show you when you are logged in and store your preferences such as your language preferences.

**Analytics Cookies.** Analytics Cookies analyze how our Platform is accessed, used, or is performing in order to provide you with a better User experience and to maintain, operate, and continually improve the Platform. These Cookies allow us to:

- Better understand Users of the Platform so that we can improve how we present our content;
- Test different design ideas for particular features;
- Determine the number of unique Users of the Platform;
- Improve the Platform by measuring any errors that occur; and
- Conduct research and diagnostics to improve product offerings.
- **Advertising and Targeting Cookies.** Advertising and Targeting Cookies may be set through the Platform by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites.

You have the right to and can control our use of Cookies and other similar technologies at any time by using the Privacy Settings and/or, by adjusting the in-app settings. However, please note that if you choose to refuse Cookies you may not be able to use the full functionality of the Platform. In addition to the above, please note that most browsers allow you to change your preferences for Cookies through their settings. These settings will typically be found in the "options" or "preferences" menu.

## **SECURITY MEASURES**

The Company diligently safeguards its Users' Personal Information against unauthorized access, alteration, disclosure, or destruction. However, like other technology firms, while the Company implements security measures to protect User information, it cannot guarantee absolute prevention of unauthorized access, hacking, data loss, or other breaches. The Company retains the right to suspend an Account without prior notice if there's reasonable suspicion of a security breach or unauthorized access to the Account. If Users suspect their Account or information is compromised, they should promptly inform the Company by contacting [support@cybro.io](mailto:support@cybro.io). Users are responsible for taking reasonable precautions to secure their Personal Information, including their account password. It's advisable not to share the Account password with anyone.

## **AMENDMENTS**

We may update our Policy from time to time. The most current version of this Policy will be posted on the Platform and you may be invited to review and accept the revised Policy in order to continue accessing the Platform and using the Services. We suggest all users regularly check the Policy on the Platform. By continuing accessing the Platform and using the Services you will be deemed to have accepted the Policy as varied from time to time.

## **CONTACT**

If you have any questions about this Policy or requests please contact us by email: [support@cybro.io](mailto:support@cybro.io).

## **ANNEX – BRAZIL PRIVACY RIGHTS**

The terms of this Annex apply to residents of Brazil under the Lei Geral de Proteção de Dados (Lei nº 13.709, de 14 de agosto de 2018) and its implementing regulations, as amended or superseded from time to time (“LGPD”). For the purposes of this Annex, Personal Information has the meaning as defined in the LGPD.

The categories of your Personal Information are collected and processed, ways and grounds we process and use Personal Information are described in the main portion of the Privacy Policy.

### **Your rights under the LGPD**

In addition to rights provided in the Privacy Policy, the LGPD provides residents of Brazil with certain legal rights. To exercise these rights, please email us at [support@cybro.io](mailto:support@cybro.io). These rights are not absolute and are subject to exemptions. In particular, you have the right to:

- Ask whether we hold personal information about you and request copies of such personal information and information about how it is processed.
- Restrict the processing of your personal information that is not being processed in compliance with the LGPD.
- Obtain information on the possibility of refusing consent and the consequences of doing so.
- Obtain information about the third parties with whom we share your personal information.
- Obtain the deletion of your personal information being processed if the processing was based upon your consent unless one or more exceptions provided for in Art. 16 of the LGPD apply.
- Revoke your consent at any time.
- Oppose a processing activity in cases where the processing is not carried out in compliance with the provisions of the law.