

TELCOIN PRIVACY POLICY

I. Overview

Telcoin has developed this Privacy Policy to explain how we may collect, retain, process, share and transfer your Personal Data when you visit our Sites or use our Services. This Privacy Policy applies to your Personal Data when you visit Sites or use Services, and does not apply to online websites or services that we do not own or control, including websites or services of other Users. Please note that our Service offerings vary by region. Capitalized terms are defined in the Definitions section. Additional terms may apply to your jurisdiction. Please refer to the Addendum to the General Terms & Conditions for your jurisdiction.

II. What Personal Data Do We Collect?

We may collect information about you when you visit our Sites or use our Services, including the following:

- **Registration and use information** – When you register to use our Services by creating an Account, we will collect Personal Data as necessary to offer and fulfill the Services you request.
- **Transaction and experience information** – When you use our Services or access our Sites, for example, to receive money or to send money to friends and family, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or requested, information about the currency or any funding instruments used to complete the transaction, Device Information and Technical Usage Data.
- **Participant information** – When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.
 - **Send or request money:** When you send or receive money through the Services, we collect Personal Data such as name, postal address, telephone number, and financial account information about the participant who is receiving money from you or sending money to you. The extent of Personal Data required about a participant may vary depending on the Services you are using to send or receive money and the jurisdiction that you are located in.
- **Information that you choose to provide us to obtain additional Services or specific online Services** – If you request or participate in an optional Site feature, or request enhanced Services or other elective functionality, we may collect additional information from you. We will provide you with a separate notice at the time of collection, if the use of that information differs from the uses disclosed in this Privacy Policy.
- **Information about you from third-party sources** – We obtain information from third-party sources such as data providers where permitted by law.

- **Other information we collect related to your use of our Sites or Services** – We may collect additional information from or about you when you communicate with us..

III. Why Do We Retain Personal Data?

We retain Personal Data to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Policy.

IV. How Do We Process Personal Data?

We may Process your information for the following reasons:

- **To operate the Sites and provide the Services**, including to:
 - send or request money or add value to an account;
 - authenticate your access to an Account;
 - communicate with you about your Account, the Sites, the Services or Telcoin;
 - create an account connection between your Account and a third-party account or platform; and
 - Perform AML/KYC and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes.
- **To manage our business needs**, such as monitoring, analyzing, and improving the Services and the Sites' performance and functionality.
- **To manage risk and protect the Sites, the Services and you from fraud by verifying your identity**, and helping to detect and prevent fraud and abuse of the Sites or Services.
- **To market to you** by delivering marketing materials about Telcoin products and online Services and the products and services of unaffiliated businesses. We may also Process your Personal Data to tailor certain Services or Site experiences to better match our understanding of your interests.
- **To provide personalized Services offered by Telcoin on third-party websites and online services.**
- **To provide you with location-specific options, functionality or offers**
- **To comply with our obligations and to enforce the terms of our Sites and Services**, including to comply with all applicable laws and regulations.
- **To respond to your requests**, for example to contact you about a question you submitted to our customer service team.

V. Do We Share Personal Data?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Policy.

We may share your Personal Data or other information for the following reasons:

With other members of the Telcoin group: We may share your Personal Data with members of the Telcoin group to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of Telcoin products, Services, and communications.

With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf.

With the other parties to transactions when you use the Services, such as other Users: We may share information with the other participants to your transactions, including other Users you are sending or receiving funds from.

With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for Telcoin's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- to law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to the Telcoin group;
- if we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; and
- to support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

VI. How Do We Work with Other Services and Platforms?

For the purposes of this Privacy Policy, an "account connection" with a third-party is a connection you authorize or enable between your Account and a non-Telcoin account, payment instrument, or platform

that you lawfully control or own. When you authorize such a connection, Telcoin and the third-party will exchange your Personal Data and other information directly.

If you choose to create an account connection, we may receive information from the third-party about you and your use of the third-party's service. If you connect your Account to other financial accounts, directly or through a third-party service provider, we may have access to your account balance and transactional information, such as purchases and funds transfers. We will use all such information that we receive from a third-party via an account connection in a manner consistent with this Privacy Policy.

Information that we share with a third-party based on an account connection will be used and disclosed in accordance with the third-party's privacy practices. Before authorizing an account connection, you should review the privacy notice of any third-party that will gain access to your Personal Data as part of the account connection.

VII. How Do We Use Cookies and Tracking Technologies?

When you visit our Sites or utilize the Services, we and certain business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies"). We use Cookies to recognize you as a customer; customize the Services, other content and advertising; measure the effectiveness of promotions; perform a wide range of analytics; mitigate risk and prevent potential fraud; and to promote trust and safety across our sites and the Services.

Certain aspects and features of the Services and the Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and the Services Services may be limited or not possible.

Do Not Track: Do Not Track ("DNT") is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

VIII. What Privacy Choices Are Available To You?

You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of your choices may be explained at the time you sign up for or use a Service or in the context of your use of a Site. You may be provided with instructions and prompts within the experiences as you navigate the Services.

- **Choices Relating to the Personal Data We Collect**

- Personal Data. You may decline to provide Personal Data when it is requested by Telcoin, but certain Services or all of the Services may be unavailable to you.
- Location and other device-level information. The device you use to access the Sites or Services may collect information about you, including User usage data that Telcoin may then collect and use. For information about your ability to restrict the collection and use of such information, please use the settings available in the device.
- **Choices Relating to Our Use of Your Personal Data**
 - Personalized Services offered by Telcoin on third-party websites and services. You may manage your preferences for other Telcoin Services that are personalized and offered to you on third-party websites from your Account. We may also provide you with instructions and prompts on how to manage your preferences within the Service experience.
 - Finding and connecting with others. If available, you may manage your preferences for finding and connecting with others from your account of the Service you use.
- **Choices Relating to Account Connections**
- If you authorize an account connection to a third-party account or platform you may be able to manage your connection preferences from your Account or the third-party account or platform. Please refer to the privacy notice that governs the third-party platform for more information on the choices you may have.
- **Choices Relating to Cookies**
 - You may have options available to manage your cookies preferences. For example, your browser or internet device may allow you delete, disable, or block certain cookies and other tracking technologies. You may choose to enable these options, but doing so may prevent you from using many of the core features and functions available on a Service or Site.
 - You may have an option regarding the use of cookies and other tracking technologies when you use a Service or visit parts of a Site. For example, you may be asked if you want the Service or Site to “remember” certain things about you, and we will use cookies and other tracking technologies to the extent that you permit them.
 - **Choices Relating to Your Registration and Account Information**
 - If you have an Account, you generally may review and edit Personal Data by logging in and updating the information directly or by contacting us. Contact us if you do not have an Account or if you have questions about your Account information or other Personal Data.
- **Choices Relating to Communication**
 - **Notices, Alerts and Updates from Us:**

Informational and Other: We will send communications to you that are required or necessary to send to Users of our Services, notifications that contain important information and other communications that you request from us. You may not opt out of receiving these communications. However, you may be able to adjust the media and format through which you receive these notices.

IX. How Do We Protect Your Personal Data?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

X. What Else Should You Know?

Changes to This Privacy Policy

We may revise this Privacy Policy from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Policy will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the “Policy Update” page of our website by the means specified on the Addendum to the General Terms and Conditions for your jurisdiction.

Transfers of Your Personal Data to Other Countries

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We and our third-party service providers store and Process your Personal Data in Japan and elsewhere in the world. We will protect your information as described in this Privacy Policy if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

XI. Contact Us

You may contact us if you have general questions about our Privacy Policy and practices or questions about your Account information or Personal Data. Please refer to the contact information on the Addendum to the General Terms and Conditions for your jurisdiction.

XII. Definitions

Account means a Telcoin account or as applicable, an account with a Telcoin partner.

Device Information means data that can be automatically collected from any device used to access the Sites or Services, such as device type; network connections; device name; IP address; and information about your device's web browser and the internet connection being used to access the Site or Services.

Telcoin means Telcoin Pte. Ltd. and its subsidiaries or affiliates. In this Privacy Policy, Telcoin is sometimes referred to as "we," "us," or "our," depending on the context.

Personal Data means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address, telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials. Personal Data does not include information that does not identify a specific User.

Process means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

Services means any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by Telcoin in connection with an Account.

Sites means the websites, mobile apps, official social media platforms, or other online properties through which Telcoin offers the Services and which has posted or linked to this Privacy Policy.

Technical Usage Data means information we collect from your phone, computer or other device that you use to access the Sites or Services.

User means an individual who uses the Services or accesses the Sites and has established a relationship with Telcoin (for example, by opening an Account).