

# Tokinvest (“We”) are committed to protecting and respecting your privacy

We will only process your personal data where permitted by applicable data protection laws, including the United Arab Emirates Personal Data Protection Law, Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data, the European and UK General Data Protection Regulation and any analogous law that may apply to you. This policy (together with our terms of use) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

This Privacy Policy is intended to assist you in making informed decisions when using the Tokinvest.Capital Site and our Services and/or to understand how your personal information may be processed by us as a result of providing the Services to third parties or when you apply to work at Tokinvest. Please take a moment to read and understand it.

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and you hereby consent to our collection and processing of the following data about you:

<b>Data</b>	<b>Purpose</b>	<b>Legal Basis / Consent</b>
Name, address, e-mail address, company name and address, phone number	To carry out our obligations arising from any contracts entered into between you (or your employer) and us and to provide you with the information, products and services that you (or your employer) request from us	Performance of contract legitimate interest in providing our products and services to you  Consent
	To provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about	Legitimate interest to develop our products/services and grow our business  Consent
	To notify you about changes to our products or services	Performance of contract; legitimate interest to develop our products/services and grow our business

	To make suggestions and recommendations to you about goods or services that may be of interest to you	Legitimate interest to develop our products/services and grow our business
	To process any job application	Consent; performance of a contract
	We use information that we observe about you from your interactions with our Site, our email communications to you and/or with Services to send you marketing communications. communications where you have consented to receive such marketing communications, or where we have a lawful right to do so.	Legitimate interest to develop our products/services and grow our business  We will only send you marketing communications where you have consented to receive such marketing communications, or where we have a lawful right to do so.
	To authenticate your access to our products, using emails and SMS messages for two factor authentication.	Consent; Performance of a contract
Name, address, e-mail address, company name and address, phone number, shareholder reference number	To maintain the shareholder register, dividend payments, voting, elections, annual report correspondence, identifying relevant products and services	Necessary for compliance with our legal obligations; Legitimate interest for the purpose of administration of our business
Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet; your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems and platform	As part of our efforts to keep our sites safe and secure	Legitimate interest; necessary for the purpose of protecting our systems and for detecting and preventing fraud
Education and employment history	To process any job application	Consent

Biometric data	Remote verification for KYC purposes  Money Laundering or Anti-Bribery, conflicts or similar obligations including, but without limitation, maintaining regulatory insurance);	Necessary for compliance with our legal obligations; Legitimate interest for the purpose of administration of our business  Consent
IP address to monitor Site traffic and volume.  Session ID to track usage statistics on our Site;  Information regarding your personal or professional interests, demographics, experiences with our products and contact preferences.	We analyse your contact details with other personal information that we observe about you from your interactions with our Site, our email communications to you and/or with our Services such as the Services you have viewed. Where you have given your consent (where lawfully required), we use cookies, log files and other technologies to collect personal information from the computer hardware and software you use to access the Site, or from your mobile.	Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best products and services to you and our other clients.

Where we intend to process the personal data that you have provided for a purpose other than that for which the personal data was collected, we shall provide you with information on that other purpose and with any relevant further information prior to that further processing.

We may receive information about you from other sources, such as conference organisers and marketing companies. Where we process this information, the legal basis for the processing will be consent. We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

## COOKIES

Our sites use cookies to distinguish you from other users of a site. This helps us to provide you with a good experience when you browse our sites and also allows us to improve our sites.

Cookies are small text files which a website may put on your computer or mobile device when you first visit a site or page. We use cookies on our sites to improve their performance and enhance your user experience.

If you do not want to receive cookies, you may choose to opt-out by changing your browser settings. Most browsers allow you to turn off cookies. Switching off cookies may restrict your use of a site and/or delay or adversely affect the way in which it operates.

Listed below are the cookies being used on the Tokinvest website. And their source and supposed usage:

First Party Cookies: Cookies that are set by the website and can only be used by the website.

## Tokinvest

- To persist user session so they stay logged in on the website (session only)
- To store currently logged in user details to pre-fill form data
- To authorise the interface with Tokinvest servers as part of user registration and onboarding
- To save user's account preferences

## Third Party Cookies

Cookies that are not set by the website owner and are primarily used for analytical data of that service or feature.

## Google

- To track current active users
- To get visits based on geolocation
- To get most visited pages and duration of user session per visit
- To get devices commonly used to access the site
- To get traffic based on time of day
- To know how users get referred to the website

## MARKETING

From time to time, we may send you information regarding that which we perceive may be of interest to you or your business. You may receive this information by letter, telephone or email. If at any time you prefer not to receive further communications from us in any or all forms (except in connection with information, products or services that you specifically request) you will have the ability to opt-out from such communications by means of a link provided in e-mails that are sent to you by us.

## DISCLOSURE OF YOUR INFORMATION

We may share your information with selected third parties including:

- Third party service providers, for example, our recruitment applicant tracking system provider, professional advisors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Analytics and search engine providers that assist us in the improvement and optimisation of our sites. Any party which acquires Tokinvest or substantially all of its assets, in which case personal data held by it about its customers will be one of the transferred assets.

- Third parties to whom we outsource certain services such as, without limitation, document processing and translation services, confidential waste disposal, IT systems or software providers, IT Support service providers, document and information storage providers.
- Third party service providers to assist us with client insight analytics, such as Google Analytics.
- Any other party as required by law, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safety of Tokinvest, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- Government or regulators including the Virtual Assets Regulatory Authority of Dubai.
- Professional indemnity or other relevant insurers.
- Regulators/tax authorities/corporate registries.

Please note this list is non-exhaustive and there may be other examples where we need to share with other parties in order to provide the Services as effectively as we can.

## WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, stored and processed in any destination where Tokinvest or its affiliates, subsidiaries or facilities used by third party service providers have a presence. We will only transfer your data to a country outside the UAE where that country ensures an adequate level of data protection or where we have mandated compliance with such standards through contractual means.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of a site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We will implement appropriate technical and organisational measures to protect your data, taking into account the nature, scope, context and purpose of the processing and the risks involved in processing. Unfortunately, the transmission of information via the internet is not completely secure. Although we will seek to protect your personal data, we cannot guarantee the security of your data transmitted to a site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## HOW LONG WILL WE STORE YOUR PERSONAL DATA

The personal data that we collect from you will be stored only for so long as is necessary to fulfil the purpose for which the data was collected, or to comply with applicable legal, tax or regulatory requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## YOUR RIGHTS

You have the following rights, subject to the provisions of relevant privacy laws:

- to access your data in accordance with then applicable privacy and subject access laws
- to request that inaccurate data be rectified
- to request that your personal data be erased
- to restrict the processing of your data
- to transfer your data between controllers
- to object to processing of personal data

Should you wish to exercise any of your rights under UAE or other privacy laws please contact Tokinvest at the address detailed below.

## CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## CONTACT

Questions, comments and requests regarding this privacy policy should be sent to Data Protection Officer, Tokinvest, DMCC Crypto Centre, Almas Tower, DMCC, Dubai, UAE.