

Privacy Policy

1. Introduction

Thank you for choosing the relevant service(s) (the "Services") and/or product(s) (the "Products") provided by OTCU TRAD INC. (BVI) ("OTCU") and its affiliates (collectively, "we", or the "Company"). By accessing or using our Services and/or Products, you agree to the policies and practices contained in this Privacy Policy (the "Privacy Policy") and represent and warrant that you have obtained valid consent and authorization from Relevant Persons (as defined below) to consent to and authorize us to collect, use, disclose and/or process your personal data in accordance with this Privacy Policy. This Privacy Policy explains how we collect, use and disclose your personal data when you access or use our Services/Products. You agree that OTCU may update this Privacy Policy at any time by posting an amended version on our website and related application program interfaces or mobile applications (the "Site") or by sending you the latest version of the Privacy Policy by email. Your use or continued use of any of our Services/Products after the revision of this Privacy Policy shall be deemed as your acceptance of and agreement to such revision.

2. What Personal Data We Collect

When you use our Services/Products or with your consent, we may from time to time collect, process and store certain personally identifiable information ("Personal Data") that can be used to contact or identify you and your beneficial owners, directors, officers, authorized signatories, employees, representatives, guarantors/security providers and other natural persons related to you ("Relevant Persons"). Such Personal Data may include contact information, information and data generated in the course of your normal interactions with us, information and data we collect when you or Relevant Persons participate in activities organized by us, and cookie information or information generated from the use of information technology applications. During the client onboarding process, the Personal Data you may provide to us may also include but is not limited to:

Individual Clients:

- Legal name (including former names, Chinese/English names, if applicable)
- Type of identification document (e.g., passport)
- Identification document number (e.g., passport number)
- Gender

- Date of birth
- Place of birth
- Nationality
- Residential address
- Country/region of residence
- Total net wealth (approximate USD)
- Purpose of opening an account
- Initial and ongoing sources of wealth or income
- Nature and details of business/occupation/employment
- Expected level of activity
- Source of funds/digital assets used for trading
- Contact phone number
- Email address
- Bank account information
- Blockchain address
- Other personal data or documents as determined by our compliance team at its discretion

Corporate Clients:

- Legal name (including Chinese/English names, if applicable)
- Company name (if different from legal name)
- Registration/incorporation information
- Contact person details
- Related party details
- Authorized representative details
- Asset information
- Other information or documents as determined by our compliance team at its discretion

3. How We Use Your Personal Data

- We may use the Personal Data we collect for the following purposes:
- To decide whether to provide or continue to provide you with Services/Products;
- To manage, operate, deliver, improve and personalize the Services/Products;
- To monitor and record the use of the Services/Products and communications with you and/or Relevant Persons (including for the purpose of investigating and preventing fraud);
- To detect, prevent and resolve technical issues;
- For risk assessment and data analysis (including data processing, anti-money laundering and credit analysis), internal management and conducting internal/external audits;

- To communicate with you, your affiliates and/or representatives about events, our Services/Products and other products or services offered by OTCU or its affiliates, unless you choose not to receive such information;
- To comply with any applicable legal, regulatory and compliance requirements (including anti-money laundering and tax obligations applicable to us);
- To enforce or maintain the rights or property of OTCU, its affiliates and other users;
- To perform any other purpose described to you at the time of data collection.

4. Do We Share Your Personal Data

We may disclose your Personal Data to the following persons:

- Our third-party service providers (including any "Know Your Customer" or other blockchain analytics service providers, and service providers providing website hosting, data analysis, information technology, mailing, communications, human resources, data processing, payment, credit reference or other services);
- Any individual or entity within OTCU and its affiliates who owes a duty of confidentiality to the disclosing entity;
- Any person to whom we are obligated or otherwise required to disclose pursuant to legal process or pursuant to any domestic or foreign legal, tax and/or regulatory obligations or requirements;
- Any actual or proposed assignee or business transferee of OTCU and/or its affiliates.

We may also disclose aggregated or anonymized Personal Data to the above persons to help them manage, operate, deliver and improve our Services/Products.

5. Do We Transfer Your Personal Data

Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. Please note that we may transfer data, including Personal Data, to a location outside your jurisdiction for processing. Your consent to this Privacy Policy and submission of such information constitutes your consent to such transfer.

We will take reasonable steps to ensure that your Personal Data is treated securely in accordance with this Agreement and that your Personal Data will

not be transferred to an organization or country that has not established adequate controls, including security measures for your Personal Data and other personal information.

6. How We Store Your Personal Data

The Personal Data we collect from you may be transferred to and stored at a destination in Singapore or outside of your state, province, country or other jurisdiction. By submitting your Personal Data, you consent to such transfer, storage or processing. Information you provide to us may also be stored on our and/or third-party cloud servers.

7. How Long Do We Retain Your Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations, resolve disputes and enforce our legal agreements and policies. By accessing/using our Services/Products, you consent to our retention of your Personal Data.

8. Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area ("EEA"), the legal basis for our collection and use of the Personal Data described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it. We may process your Personal Data for the following reasons:

- We need to use your Personal Data to enter into a contract with you or to perform our obligations under a contract;
- You have consented to our processing of your Personal Data;
- Processing your Personal Data is in our legitimate interests or is necessary to perform our legal obligations;
- To comply with applicable laws and regulations.

If you are an EEA resident, you have certain data protection rights. We strive to take reasonable steps to enable you to correct, amend or delete your Personal Data or restrict the use of your Personal Data. Please see Section 15 below (Contacting Us About Privacy Questions or Concerns).

In certain circumstances, you have the following data protection rights:

- You have the right to access, update or delete the information we hold about you.

- Right of rectification. You have the right to have your information rectified if it is inaccurate or incomplete.
- Right to object. You have the right to object to our processing of your Personal Data.
- Right of restriction. You have the right to request that we restrict the processing of your Personal Data.
- Right to data portability. You have the right to obtain a copy of the information we hold about you.
- Right to withdraw consent. Where we rely on your consent to process your Personal Data, you have the right to withdraw your consent at any time.

9. Marketing Communications

We may send company news, promotional advertisements and information related to our products and services. We may also share your Personal Data with our affiliates so that they can send marketing communications. By using our Services/Products, you accept this Privacy Policy and agree to receive such marketing communications, unless you choose not to receive such marketing communications during the client onboarding process.

If you have previously chosen to receive such communications but have changed your mind and no longer wish to receive them, please send an email to support@otcu.io with the subject line "Marketing Opt Out".

To ensure the quality of our Services/Products, you understand that you will not be able to opt out of receiving communications related to Services/Products, such as revisions to terms and conditions, updates and operational notices.

10. Cookie Usage

When you visit our Site, we may, in accordance with industry practice, place a small amount of data in your browser (a "Cookie"). Such information may be placed on your computer or other device used to access our Site. Such information helps us identify your customer identity, collect information about your use of our Services/Products, better personalize our services and improve your experience. We may also use the information we collect to ensure compliance with our compliance program and to ensure that your account security is not compromised by detecting unusual or suspicious account activity.

Most browsers are set to automatically accept Cookies. When you complete a session, some Cookies expire, while others remain on your computer or other device until deleted or expired. You may choose to refuse our Cookies, but

this may affect the functionality of our Services/Products or your user experience.

Some browsers have a do-not-track feature that allows you to tell websites that you do not want your online activities to be tracked. At the moment, we do not respond to browser do-not-track signals.

11. Information Security

We strive to prevent unauthorized access, alteration, disclosure or destruction of the data we collect and store, both by ourselves and by you. We take various measures to ensure information security, including using SSL to encrypt our communications, requiring two-factor authentication for all sessions, regularly reviewing our Personal Data collection, storage and processing practices, and limiting access to your Personal Data to the extent necessary.

The security of your data is important to us, but you must understand and acknowledge that no method of transmission over the Internet or method of electronic storage is completely secure. We will strive to protect your Personal Data using commercially acceptable means, but we cannot guarantee its absolute security.

12. Links to Other Sites

Our website may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's website. We strongly recommend that you review the privacy policy of each website you visit. You understand that we have no control over and assume no responsibility for the content, privacy policies or practices of any third-party websites or services.

13. Minor Policy

We do not provide Services/Products to minors under the age of 18. We do not knowingly or intentionally collect personally identifiable information from minors under the age of 18. If you are a parent or guardian and you know that your child has provided us with Personal Data, please contact us and we will take appropriate action.

14. Your Contact with Other Customers

You understand that you are solely responsible for your interactions with other users. We have the right (but not the obligation) to regulate disputes between you and other users.

15. Contacting Us About Privacy Questions or Concerns

If you have any questions about this Privacy Policy or the use of your Personal Data, please send an email to support@otcu.io with the subject line "Privacy Question".

If you would like to know what Personal Data we retain and would like to update, revise or delete such data from our systems, please send an email to support@otcu.io with the subject line "Data Inquiry". We will make every effort to act on your request as soon as possible, but in some cases (such as for legal compliance or other legitimate purposes) we may refuse your deletion request.

If you wish to withdraw your consent, please send an email to support@otcu.io with the subject line "Data Inquiry". If you or Relevant Persons withdraw your/their consent or fail to provide the relevant information or data we need to provide you with Services/Products, we may not be able to provide (or continue to provide) you with Services/Products.

To respond to data access, modification, deletion or data portability requests, we will verify the identity of the requester to ensure that they are legally entitled to make such requests. While we respond to such requests free of charge, in some cases (especially when you make multiple requests or when the content of your request is onerous or complex), we reserve the right to charge you a reasonable fee.

16. Language

If this Agreement is translated from English into any other language, and there is any inconsistency between the various language versions, the English version shall prevail.