AXNAB – Global Privacy and Cookies Policy

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AXNAB operates internationally through different entities (together "**AXNAB**," "**we**," "**us**," or "**our**") to provide fiat on ramp and fiat off ramp services for buying and selling cryptocurrency. Please see the table below in "Contact Us" to determine which AXNAB entity or entities you are contracting with.

This Privacy Policy is designed to help you understand how we collect, use, process, and share your personal information, and to help you understand and exercise your privacy rights.

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ANNEX A – GRAMM-LEECH-BLILEY ACT ("GLBA") PRIVACY NOTICE

1. SCOPE AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy applies to personal information processed by us, including on our websites, mobile applications, and other online or offline offerings. To make this Privacy Policy easier to read, our websites, mobile applications, and other offerings are collectively called the "**Services**."

For information on our processing of Non-public Information that is subject to Gramm-Leach-Bliley Act ("**GLBA**"), please see **Annex A – GLBA Privacy Notice**.

For information on our processing of Non-public Information that is subject to the General Data Protection Regulation ("**GDPR**"), please see **Annex B – EU Privacy Notice Addendum**.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

2. NOTICE AT COLLECTION

We collect information from you and about you. Here are some examples of the information we may collect, how we may collect it, how we may use it, how we may disclose it and whether we share it for cross-contextual marketing purposes or sell it. Below this Notice At Collection, you will find more detailed

descriptions of how we may use and disclose these categories of personal information. For information regarding our data retention criteria, please see the Retention of Personal Information section below.

The categories of personal information we collect / process depend on how you interact with us, our Services, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Personal Information You Provide to Us Directly

- **Account Administration information**. We may collect personal information from you in connection with the administration of your account. This personal information may include your name, date of birth, age, nationality, country of residence, gender, occupation, signature, utility bills, professional details, photographs, video footage, phone number, home address, email address, government issued identification such as passport, driver's license, national identification card with photograph, tax identification number, national insurance number, social security number and visa information.

    - **We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**

- **Financial and Transactional Information**. We may collect financial information such as your wallet address, bank account numbers, bank statements, transaction history, trading data, and credit/debit card numbers. We may collect personal information and details associated with your transactions including, but not limited to, information about the transactions you make using the Services, the purpose of the transactions, information on sources of your funds, sender and receiver of funds, and ultimate beneficiary information.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**

- **Your Communications with Us**. We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter, request customer or technical support, or otherwise communicate with us.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**

- **Surveys**. We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Interactive Features**. We and others who use our Services, such as our third-party technology vendors, may collect personal information that you submit or make available through our interactive features (e.g., messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered "public," unless otherwise required by applicable law.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Sweepstakes or Contests**. We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Conferences, Trade Shows, and Other Events**. We may collect personal information from you when we attend or host conferences, trade shows, and other events.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Business Development and Strategic Partnerships**. We may collect personal information from you and third parties to assess and pursue potential business opportunities.

- **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
- **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
- **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**

- **Job Applications**. We may post job openings and opportunities on our Services. If you respond to one of these postings, we may collect your personal information, such as your application, CV, cover letter, and/or any other information you provide to us.
  - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
  - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
  - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**

B. Personal Information Collected Automatically

We may collect personal information automatically when you use our Services, as described below.

- **Technical Information**. We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including precise location information and/or approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other Information about how you use our Services.
  - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
  - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
  - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Biometric Information.** If you consent to our collection of biometric information or if our collection of biometric information is otherwise permitted, you agree that we may use facial recognition technology to extract biometric information contained in facial images that you provide to the Services. For example, we may compare the face on your government-issued photo ID against a selfie that you provide to us. We use this biometric information for identity verification and fraud prevention. This information may be shared with, or collected by, our service providers to facilitate these purposes. Where required by law, we will delete your biometric information within one year from your last interaction with the Services. For more information about our processing of biometric information, please click here https://axnab.com/biometric-privacy-disclosure-and-consent.

C. Personal Information Collected from Other Sources

- **Third-Party Services and Sources**. We may obtain personal information about you from other sources, including through Third-Party Services (defined below) and organizations. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect personal information about you from that third-party application that you have made available via your privacy settings. We may also obtain personal information about you from other third-party sources, including information about your transactions, wallet balances or usage, and other information.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Credit Bureaus and ID Verification Partners.** We may obtain personal information about you from credit bureaus and identity verification partners.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Blockchain Information.** We may obtain personal information about you through our analysis of blockchain information.
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.
    - **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**
- **Referrals and Sharing Features**. Our Services may offer various tools and functionalities that allow you to provide personal information about your friends through our referral service. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Services. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or coworker).
    - **How We May Use It:** To provide our services; for administrative purposes; for marketing and advertising our products and services; with your consent; for other purposes; or at your request or direction.
    - **How We May Disclose It:** To provide our services; to protect us or others; in the event of a merger, sale or other asset transfers; at your request or direction or as we may otherwise request at the time of collection.

- **We Do Not Share This Information For Cross-Contextual Marketing Purposes or Sell This Information.**

3. HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our products and Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Facilitating the on-ramp and off-ramp Services for the currencies you request;
- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Short-term, transient use, such as contextual customization of ads;
- Improving, upgrading, or enhancing our Services;
- Developing new products and services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Disclosing personal information to our services providers as needed to provide the Services;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing and Advertising our Products and Services

We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we may market to you include email campaigns, text messages, custom audiences advertising, and "interest-based" or "personalized advertising," including through cross-device tracking.

If you have any questions about our marketing practices, you may contact us at any time as set forth in "Contact Us" below.

D. With Your Consent

We may use personal information for other purposes that are compatible with the specific purpose(s) that were disclosed to you at or before the time you provided your personal information, or with your consent.

E. Other Purposes

We also use your personal information for other purposes as requested by you or as permitted by applicable law.

- **Automated Decision Making**. We may engage in automated decision making, including profiling. For example, we may engage in automated decision making for purposes of fraud prevention. This automated decision making may involve the processing of your name, contact information and government identification numbers. This process allows us to verify the identity of the users of the Services and protect ourselves and our users by allowing us to detect and prevent fraudulent or criminal transactions. As a result of our use of automated decision making, your account, or specific transactions through the Services, may be suspended or denied. You may have the right to opt out of the processing of your personal information for profiling in furtherance of decisions about you that produce legal or similarly significant effects. AXNAB's processing of your personal information will not result in a decision based solely on automated processing that significantly affects you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making. If you have questions about our automated decision making, you may contact us as set forth in "Contact Us" below.
- **De-identified and Aggregated Information**. We may use personal information to create de-identified and/or aggregated information, such as demographic information, information about the device from which you access our Services, or other analyses we create.

F. At Your Request or Direction

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

4. HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We disclose your personal information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

Notice Regarding Use of the Blockchain. Aspects of our Services may be hosted on or interact with the blockchain. Where you use aspects of our Services that are hosted on or interact with the blockchain, information about your interactions and/or transactions will be provided to the applicable blockchain network and may be accessible to third parties due to the nature of the blockchain protocol.

The categories of third parties with whom we may disclose your personal information are described below.

- **Service Providers.** We may disclose your personal information to our third-party service providers and vendors that assist us with the provision of our Services. This includes service providers and vendors that provide us with IT support, hosting, payment processing, identity verification services, customer service, and related services.

- **Service Provider – Sift.** One of the service providers AXNAB may provide personal information to

- **Third-Party Services.** Certain features and functionalities of the Services may link to or allow you to interface, interact, or share information with, access and/or use third-party websites, services, products, and technology (collectively, "**Third-Party Services**"). For example, you may use the Services to interact with Third-Party Services such as financial institutions and cryptocurrency exchanges and vice versa. Any information disclosed to or otherwise collected by a Third-Party Service may be subject to the Third-Party Service's privacy policy. We do not provide or control any aspect of the Third-Party Services and are not responsible for any compatibility issues, errors or bugs in the Services or Third-Party Services caused in whole or in part by the Third-Party Services or any update or upgrade thereto. We encourage our users to read the privacy policies of each Third-Party Service with which they interact. We do not endorse, screen or approve, and are not responsible for such Third-Party Services. Providing information to or interacting with Third-Party Services is at your own risk.
- **Third-Party Services – ComplyAdvantage**. Your personal data may be shared with ComplyAdvantage for purposes of fraud and anti-money laundering risk detection as required by applicable law. The terms of its privacy policy can be found at https://complyadvantage.com/terms-and-conditions/#privacy-cookies.
- **Third-Party Services – Plaid.** If you are based in the US, we may use Plaid, Inc. ("**Plaid**") to connect your AXNAB account with your bank account, verify your bank account and confirm your bank account balance prior to approving a transaction. Information shared with Plaid is treated by Plaid in accordance with its Privacy Policy, which is available at https://plaid.com/legal/#end-user-privacy-policy.
- **Business Partners.** We may disclose your personal information to business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.
- **Affiliates.** We may share your personal information with our company affiliates.
- **APIs/SDKs.** We may use third-party application program interfaces ("**APIs**") and software development kits ("**SDKs**") as part of the functionality of our Services. For more information about our use of APIs and SDKs, please contact us as set forth in "Contact Us" below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

D. At Your Request or Direction or As We May Otherwise Request at the Time of Collection

We may disclose personal information for other purposes at your request or direction. We may also disclose your personal information for purposes that are specifically disclosed at the time of collection.

5. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws. Please note that due to technical restrictions inherent in the blockchain, deletion of some of your personal information may be difficult or impossible.

6. COOKIE AND OTHER TRACKING TECHNOLOGIES

We, as well as third parties that provide content, advertising, or other functionality on our Services, may use cookies, pixel tags, and other technologies ("**Technologies**") to automatically collect information through your use of our Services.

- **Cookies**. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- **Pixel Tags/Web Beacons**. A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- **Operationally Necessary**. This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity (*see Sift above at section 4.(A)*), improve security, or allow you to make use of our functionality;
- **Performance-Related**. We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- **Functionality-Related**. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Analytics**. We may use Technologies and other third-party tools to process analytics information on our Services. These Technologies allow us to better understand how our digital Services are used and to continually improve and personalize our Services. Some of our analytics partners include:
    - **Google Analytics.** For more information about how Google uses your personal information (including for its own purposes, e.g., for profiling or linking it to other data), please visit Google Analytics' Privacy Policy. To learn more about how to opt-out of Google Analytics' use of your information, please click here.
    - **Hotjar (Session Replay Analytics)**. We use Hotjar's session replay analytics services. This allows us to record and replay an individual's interaction with the Services. For more information about how Hotjar uses your personal information, please visit the "Personal Data collected from a visitor of a Hotjar Enabled Site" section of Hotjar's Privacy Policy. To learn more about how to opt-out of Hotjar's use of your information, please click here.
    - **Microsoft Clarity.** Microsoft collects or receives personal data and/or personal information from you to provide Microsoft advertising. For more information about how Microsoft uses your personal data and information, please visit the Microsoft Privacy Statements.

7. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- **Email Communications**. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).
- **Text Messages**. If you receive an unwanted text message from us, you may opt out of receiving future text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us as set forth in "Contact Us" below.
- **Mobile Devices**. We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.
- **Phone Calls**. If you receive an unwanted phone call from us, you may opt out of receiving future phone calls from us by following the instructions which may be available on the call or by otherwise contacting us as set forth in "Contact Us" below.
- **"Do Not Track."** Do Not Track ("**DNT**") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies and Personalized Advertising**. You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Services may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for Android, iOS, and others. The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the Network Advertising Initiative, the Digital Advertising Alliance, the European Digital Advertising Alliance, and the Digital Advertising Alliance of Canada. Please note you must separately opt out in each browser and on each device.

Your Privacy Rights. Based on your state and country of residence, you may have the rights listed below with respect to the personal information that we maintain about you. We may take steps to verify your identity, as permitted or required under applicable law, before we process your request. Verification may include asking you to provide information about yourself that we can match against information already in our possession.

- **Access to and Portability of Your Personal Information**, including:
  - confirming whether we are processing your personal information;
  - obtaining access to or a copy of your personal information;
  - (where applicable in certain jurisdictions) receiving information regarding public and private entities with which we may have shared your personal data; and
  - receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (also known as the "right of data portability");

- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- **Request Deletion** of your personal information;
- **Request Restriction of or Object to** our processing of your personal information;
- **Right to object to an automated decision** that significantly affects you;
- **Right to Opt Out of the Sale or Sharing of Personal Information.** This means that you have the right to opt out of the "sale" of your personal information or "sharing" of personal information with third parties for cross-contextual marketing purposes, as these terms are defined by applicable state law. Please note that we have not "sold" or "shared" personal information in the past 12-months.
- **Use or Disclosure of Sensitive Personal Information**. Some laws classify certain personal information as sensitive personal information. We do not process sensitive personal information except as necessary to provide the Services and to comply with our own regulatory compliance and reporting obligations;
- **Withdraw your Consent** to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal; and
- **Right to Non-Discrimination**. This means that we are prohibited from discriminating against you if you exercise your rights under applicable law

If you would like to exercise any of these rights, please contact us as set forth in "Contact Us" below. We will process such requests in accordance with applicable laws. Please note that technical restrictions inherent in the blockchain may make certain requests difficult or impossible (e.g., deletion).

Agents. Agents that you have authorized to act on your behalf may also submit privacy requests as instructed above. The agent must also provide evidence that they have your written permission to submit a request on your behalf. If we are unable to verify the authenticity of a request, we may ask you for more information or may deny the request.

De-Identified Information. If we create or receive de-identified information, we will not attempt to reidentify such information, except to comply with applicable law.

Appeal Process. If you exercise any of the above rights and either (a) receive a decision from us which you disagree with or (b) we have not acted on your request within the statutorily mandated timeframe, you may submit a written appeal by contacting us as set forth in "Contact Us" below. If we deny the appeal, you may contact your relevant regulator (e.g., if you are a resident of Virginia, you may submit a compliant to the Virginia Attorney General at: https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint).

8. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

9. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that

are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

If we transfer personal information which originates in the European Economic Area, Switzerland, and/or the United Kingdom to a country that has not been found to provide an adequate level of protection under applicable data protection laws, one of the safeguards we may use to support such transfer is the EU Standard Contractual Clauses or the UK International Data Transfer Agreement.

For more information about the safeguards we use for international transfers of your personal information, or the transfers themselves, please contact us as set forth below.

10. SUPPLEMENTAL NOTICE FOR CERTAIN INTERNATIONAL COUNTRIES

A. Supplemental Notice for Australia

This Supplemental Notice for Australia only applies to our processing of personal information that is subject to the applicable data protection laws of Australia.

- **Sensitive Personal Information.** We do not generally require you to disclose any sensitive personal information (e.g., details of race, religious belief, sexual orientation, or membership of a trade union) to us. If you do provide us with sensitive personal information for any reason, you consent to us collecting that information and using and disclosing that information for the purpose for which you disclosed it to us and as permitted by the *Privacy Act 1988* (Cth) ("**Privacy Act**").
- **Marketing.** We will only use and disclose your personal information for the purposes of marketing our Services or services of third-party organizations where you have consented to us doing so, or as otherwise permitted by law.
- **International Transfers.** Except in some cases where we may rely on an exception under the Privacy Act, we will take reasonable steps to ensure that any overseas recipients of personal information which originates in Australia do not breach the 'Australian Privacy Principles' in the Privacy Act in relation to such information.
- **Children's Information.** If an individual indicates they are under 15 and we are required to obtain the individual's consent (for example, for the collection of sensitive information), we will seek consent from the individual's parent or legal guardian.

B. Supplemental Notice for Canada

This Supplemental Notice for Canada only applies to our processing of personal information that is subject to the applicable data protection laws of Canada.

- **Security of Your Information.** The files and records containing your personal information will be kept in our offices and/or on our servers or those of our service providers, and only those employees that require it for the purposes of their duties will have access to these files.
- **International Transfers and Access.** Personal information may be accessible to the courts and the law enforcement and national security authorities of the United States. To obtain more information about AXNAB's policies and practices with respect to service providers outside of Canada, please contact us as set forth in Contact Us below.

C. Supplemental Notice for the European Economic Area and the United Kingdom

This Supplemental Notice for the European Economic Area and the United Kingdom only applies to our processing of personal information that is subject to the applicable data protection laws of the European Economic Area or the United Kingdom.

These are the processing goals, legal processing grounds and retention terms for personal data we collected directly from you:

Category of data	Processing goals	Processing grounds	Retention term
Account administration Such as: name, date of birth, age, nationality, country of residence, gender, occupation, signature, utility bills, professional details, photographs, video footage, phone number, home address, email address, government issued identification such as passport, driver's license, national identification card with photograph, tax identification number, national insurance number, social security number, visa information and/or any other information deemed necessary to comply with our legal obligations under anti-money laundering and counter terrorism financing laws and procedures	To onboard you as our customer and to provide our Services	Necessary for the performance of our contract and to take steps prior to entering into a contract (Art. 6.1(b) of the GDPR and UK GDPR)	1 year after closing your account
	To comply with legal obligations, such as tax-, social security legislation laws to counter money laundering and financing of terrorism	Necessary for compliance with a legal obligation (Art. 6.1(c) of the GDPR and UK GDPR)	As long as the applicable legal obligation dictates. Tax legislation In UK, LU and LV: 10 years. In NL: 7 years Anti-money laundering In UK, LU and NL: 5 years after the end of your relationship with us. In LV: 8 years after the end of your relationship with us.
	To send you information or offer you services that are akin to Services we already provide to you	Necessary for the purposes of a legitimate interest (Art. 6.1(f) of the GDPR and UK GDPR), which legitimate interest is direct marketing and order recovery and updates	1 year after closing your account
	To send you information or commercial offers that are different from the Services that we already provide to you	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	Until you withdraw your consent
Financial and transactional information Such as: wallet address, bank account numbers, bank statements, transaction history, trading data, credit/debit card numbers. Information about the transactions you make using the Services, the purpose of the transactions, information on sources of your funds, sender and receiver of funds, and ultimate beneficiary information	To provide our services	Necessary for the performance of our contract (Art. 6.1(b) of the GDPR and UK GDPR)	1 year after closing your account
	To comply with legal obligations, such as tax-, social security- and anti-money laundering laws	Necessary for compliance with a legal obligation (Art. 6.1(c) of the GDPR and UK GDPR)	As long as the applicable legal obligation dictates Tax legislation In UK, LU and LV: 10 years. In NL: 7 years Anti-money laundering In UK, LU and NL: 5 years after the end of your relationship with us. In LV: 8 years after the end of your relationship with us.

Category of data	Processing goals	Processing grounds	Retention term
Your communications with us	To answer your questions and to provide our Services To document our rights and obligations towards you	Necessary for the performance of our contract (Art. 6.1(b) of the GDPR and UK GDPR)	1 year after closing your account
		Necessary for the purposes of a legitimate interest (Art. 6.1(f) of the GDPR and UK GDPR)	As long as the applicable statute of limitations for rights or liabilities that are connected to the topic of the communication
Your responses in surveys	To develop our business and enhance our services	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	3 years after your participation in the survey, or until you withdraw your consent (whichever is sooner)
Information you provide through our Interactive Features	If you communicate with us directly (privately) through our Interactive Features: to answer questions you might have or provide services that you request	Necessary for the performance of our contract (Art. 6.1(b) of the GDPR and UK GDPR)	1 year after closing your account
	If you publicly post something on our Interactive Features: to share information for the benefit of others who take an interest in our services and our Interactive Features	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	Until you withdraw your consent
Information you provide at conferences, trade shows or other events	For market research, in order to develop our business and enhance our services To contact you, e.g. with questions or offers connected to the expertise or interests you displayed at the conference, trade show, or event	Necessary for the purposes of our legitimate interest (Art. 6.1(f) of the GDPR and UK GDPR), which legitimate interest is research and development (including marketing research) and taking into consideration that the processed personal data was provided of your own volition at the conference/trade show/event and that our processing is in line with the spirit in which the data was provided	2 years after the conference, trade show or event
Information you provide in a job application	To evaluate your application and respond to it	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	6 months after we gave you our final decision on your application, or one year with your permission

These are the processing goals, legal processing grounds and retention terms for personal data that are collected automatically when you use our Service:

Category of data	Processing goals	Processing grounds	Retention term
Internet protocol (IP) address, user settings, MAC address, cookie identifiers,	To allow our computers to recognize your device and communicate with it, in	Necessary for the performance of our contract	For the duration of your session

Category of data	Processing goals	Processing grounds	Retention term
mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including precise location information and/or approximate location derived from IP address), and Internet service provider.	order to perform our Services	(Art. 6.1(b) of the GDPR and UK GDPR)	
	To monitor the use of our Services for the purpose of recognizing and combating attacks on its security	Necessary for the purposes of our legitimate interest (Art. 6.1(f) of the GDPR and UK GDPR), which legitimate interest is network and information security and fraud prevention	24 hours after ending your session
	To better understand the way people use our Services, so that we can improve on them	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	2 years, or until you withdraw your consent; whichever is sooner
	To share this information with our advertising partners, so that they may offer you information or advertisements that are tailored to you interests	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	2 years, or until you withdraw your consent; whichever is sooner
Information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services	To better understand the way people use our Services, so that we can improve on them	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	2 years, or until you withdraw your consent; whichever is sooner
	To share this information with our advertising partners, so that they may offer you information or advertisements that are tailored to you interests	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	2 years, or until you withdraw your consent; whichever is sooner
Biometric data, e.g. for facial recognition	For identification and authentication only	Your explicit consent (Art. 6.1(a) of the GDPR and UK GDPR)	1 year after closing your account, or until you withdraw your consent; whichever is sooner

These are the processing goals, legal processing grounds and retention terms for personal data that we collect elsewhere:

Category of data	Processing goals	Processing grounds	Retention term
Information we receive if you access our Services through an app store, a third-party login service, or a social networking site, that you have made available via your privacy settings	To identify you and authorize your access to our Services	Necessary for the performance of our contract (Art. 6.1(b) of the GDPR and UK GDPR)	As long as is technologically necessary to grant you access to our Services
	To offer you information or advertisements that are tailored to you interests	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	Until you withdraw your consent
Information we receive from credit bureaus and identity verification partners	To assess our risks when contracting with you	Necessary for the performance of our contract (Art. 6.1(b) of the GDPR and UK GDPR)	1 year after closing your account

Category of data	Processing goals	Processing grounds	Retention term
	To comply with legal obligations, such as tax-, social security- and anti-money laundering laws	Necessary for compliance with a legal obligation (Art. 6.1(c) of the GDPR and UK GDPR)	As long as the applicable legal obligation dictates Tax legislation In UK, LU and LV: 10 years. In NL: 7 years Anti-money laundering In UK, LU and NL: 5 years after the end of your relationship with us. In LV: 8 years after the end of your relationship with us.
Information about your transactions, wallet balances or usage, and other information we obtain through analysis of blockchain information of from third parties	To develop our business and enhance our services	Necessary for the purposes of our legitimate interest (Art. 6.1(f) of the GDPR and UK GDPR), which legitimate interest is research and development (including marketing research) and network and information security and fraud prevention	1 year after closing your account
	To comply with legal obligations, such as tax-, social security- and anti-money laundering laws	Necessary for compliance with a legal (Art. 6.1(c) of the GDPR and UK GDPR)	As long as the applicable legal obligation dictates Tax legislation In UK, LU and LV: 10 years. In NL: 7 years Anti-money laundering In UK, LU and NL: 5 years after the end of your relationship with us. In LV: 8 years after the end of your relationship with us.
Your email address or other contact information if we received it through our referral service	To send you the information that your friend/relation thinks you are interested in	Our legitimate interest (Art. 6(f) of the GDPR and UK GDPR), which legitimate interest is direct marketing	For as long as is technologically necessary to send the information to you.
	To send you further communications, if you opt in	Your consent (Art. 6.1(a) of the GDPR and UK GDPR)	Until you withdraw your consent
	To monitor the effect of our referral service	Our legitimate interest (Art. 6(f) of the GDPR and UK GDPR), which legitimate interest is direct marketing and to provide our Services	2 years after the referral

11. CHILDREN'S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent, you may contact us as described in "Contact Us" below. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account, if applicable.

12. OTHER PROVISIONS

Supervisory Authority. If your personal information is subject to the applicable data protection laws of Australia, Brazil, Canada, the European Economic Area, Switzerland, the United Kingdom or Turkey, you have the right to lodge a complaint with the competent supervisory authority or attorney general if you believe our processing of your personal information violates applicable law.

- Office of the Australian Information Commissioner
- Brazilian National Data Protection Authority (ANPD)
- Office of the Privacy Commissioner of Canada (OPC)
- EEA Data Protection Authorities (DPAs)
- Swiss Federal Data Protection and Information Commissioner (FDPIC)
- UK Information Commissioner's Office (ICO)
- Turkey Personal Data Protection Authority

13. CONTACT US

The following table describes which entity (or entities) you are contracting with:

Where you reside	Services and/or Payment Method	AXNAB entity you are contracting	AXNAB entity contact information	Governing law and venue
Default – Anywhere unless expressly identified elsewhere in this table	All	EU Internet Ventures B.V.	Nieuwezijds Voorburgwal 162, 1012 SJ Amsterdam, Netherlands privacy@AXNAB.com	Amsterdam, Netherlands
Argentina	Bank / Wire	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
Australia	All	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
Brazil	PIX	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
Canada	All	Richmond Internet Ventures Corporation	Suite 1103, 11871 Horseshoe Way, Richmond BC V7A 5H5, Canada privacy@AXNAB.com	British Columbia, Canada

Where you reside	Services and/or Payment Method	AXNAB entity you are contracting	AXNAB entity contact information	Governing law and venue
Chile	Bank / Wire – Khiphu	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
Colombia	Bank / Wire – Pagos Seguros en Línea (PSE)	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
Mexico	Bank / Wire	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
Netherlands	All	EU Internet Ventures B.V.	Nieuwezijds Voorburgwal 162, 1012 SJ Amsterdam, Netherlands privacy@AXNAB.com	Amsterdam, Netherlands
Peru	Bank / Wire	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
South Africa	Bank / Wire	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
Thailand	Bank / Wire – PromptPay – Thai QR	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
United Kingdom	All	EU Internet Ventures B.V.	Nieuwezijds Voorburgwal 162, 1012 SJ Amsterdam, Netherlands privacy@AXNAB.com	Amsterdam, Netherlands
United Kingdom	All (unless expressly identified elsewhere in this table)	BNXA UK VASP Limited[1]	Cannon Place, 78 Cannon Street, London, England, EC4N 6AF privacy@AXNAB.com	English, England and Wales
United States of America	ACH	EU Internet Ventures B.V.	Nieuwezijds Voorburgwal 162, 1012 SJ Amsterdam, Netherlands privacy@AXNAB.com	Amsterdam, Netherlands

[1] BNXA UK VASP Limited has not and will not commence contracting with any persons until (at the earliest) 24 September 2024. Accordingly, all United Kingdom based persons contracting with AXNAB will be contracting with EU Internet Ventures B.V – subject always to clause 20 in Part A of the Customer T&Cs.

Where you reside	Services and/or Payment Method	AXNAB entity you are contracting	AXNAB entity contact information	Governing law and venue
United States of America	Wire	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia
United States of America	All (unless expressly identified elsewhere in this table)	BNXA USA MTL Inc.	1 East Liberty Street, Suite 600, Office 16, Reno, NV USA 89501 privacy@AXNAB.com	Nevada, U.S.A.
Vietnam	Bank / Wire	Global Internet Ventures Pty Ltd	Forum Workspace BANXA, Level 2, 65 Dover St, Cremorne VIC 3121, Australia privacy@AXNAB.com	Victoria, Australia

The AXNAB entity (or entities) you are contracting with (each a "**AXNAB Party**") is the controller of the personal information processed under this Privacy Policy. However, the AXNAB Party may also disclosure your personal information to other AXNAB affiliates and such affiliates may also act as a controller of your personal information.

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us using the information set forth above.

● ANNEX A – GRAMM-LEACH-BLILEY ACT ("GLBA") PRIVACY NOTICE

- Rev. December 16, 2025
- This GLBA Privacy Notice supplements our Privacy Policy and only applies to our processing of "Non-public Information" that is subject to the GLBA. All "personal information" referred to in this GLBA Privacy Notice is "Non-public Information" under the GLBA.

FACTS	**WHAT DOES AXNAB DO WITH YOUR PERSONAL INFORMATION?**
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: ▪ Name, date of birth, age, nationality, country of residence, gender, occupation, signature, professional details, social security number, and driver's license or ID number. ▪ Wallet address and wallet transactions ▪ Banking information
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons AXNAB chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	**Does AXNAB share?**	**Can you limit this sharing?**
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	Yes
For our affiliates' everyday business purposes— information about your transactions and experiences	No	N/A
For our affiliates' everyday business purposes— information about your creditworthiness	No	N/A
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit our sharing	▪ Call +1 800-909-9664 or ▪ Visit us online: www.AXNAB.com (see Contact Us in the Privacy and Cookies Policy) **Please note:** If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	Call +1 800-909-9664 or go to www.AXNAB.com (see Contact Us in the Privacy and Cookies Policy)

Who we are	
Who is providing this notice?	BNXA USA MTL Inc.
What we do	
How does AXNAB protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does AXNAB collect my personal information?	We collect your personal information, for example, when you ▪ Open an account with us. ▪ Use our services. We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only ▪ sharing for affiliates' everyday business purposes— information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include financial companies such as: ▪ AXNAB Holdings Inc. ▪ BTC Corporation Holdings Pty Ltd ▪ BNXA USA Holding Inc. ▪ BNXA USA MTL Inc.

	▪ BNXA USA Operating Inc. ▪ BNXA USA NV Inc. ▪ Global Internet Ventures Limited ▪ AXNAB.com Pty Ltd ▪ BC Cloud Mining Pty Ltd ▪ LT Internet Ventures UAB ▪ Rhino Loft Pty Ltd ▪ Richmond Internet Ventures Corporation ▪ EU Internet Ventures B.V. ▪ BNXA UK Holding Limited ▪ BNXA UK VASP Limited ▪ BNXA Brazil LTDA ▪ BNXA PHL Inc
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Non-affiliates we share with can include co-branded partners, data processors, and advertisers.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.