#### PRIVACY & COOKIES POLICY

Thank you for visiting our website. We at Estate Protocol (referred to as "we", "us" and "Company" in this policy), respect your concerns about privacy. This privacy policy ("Privacy Policy") has been developed to better serve those who are concerned with how their "Personally identifiable information (PII)" is being used online by us and explains our practices for information collected via the website, how such information is used, the circumstances under which we disclose such information to third parties and the choices you can make about the way we use and share such information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

We will process your personal information at all times in accordance with applicable privacy and U.S. data protection laws. The purpose of this Privacy Policy is to provide transparency around how we collect information on this website. Please take the time to read and understand this Privacy Policy so you can understand how we use your personal information.

PLEASE READ THIS POLICY CAREFULLY BEFORE SUBMITTING YOUR PERSONAL INFORMATION THROUGH OUR WEBSITE OR ACCESSING, BROWSING OR OTHERWISE TRANSACTING OR USING OUR WEBSITE. IF YOU SUBMIT YOUR PERSONAL INFORMATION ON OUR WEBSITE, YOUR INFORMATION WILL BE PROCESSED AS PER TERMS OF THIS POLICY.

#### 1. OUR COMMITMENT

We are committed to protecting your personal information, and ensuring its privacy, accuracy and security. We handle your personal information in a responsible manner in accordance with the Federal Privacy laws. By visiting our website, transacting on our website or giving us your personal information, you agree that your information being collected, stored, used and disclosed as set out in this Policy.

#### 2. CHILDREN'S PRIVACY

This website is not intended for use by children under the age of 13 (or under the age of 16 in some jurisdictions). By using our website, users represent that they are legal adults or have obtained the necessary permission from their parent or guardian to provide any personal information. If you have concerns about this website or its services, or if you believe that your child has gained access to our website without your permission, you may contact us via Email. If we become aware that we have unintentionally collected personal information from a child without proper consent, we will take immediate steps to delete such information from our records.

#### 3. WHOSE PERSONAL AND OTHER INFORMATION DO WE COLLECT?

We may collect user's personal and other personal information from a range of sources, including from user itself. Wherever reasonable and practicable, we collect personal information

from the individual to whom the information relates. Providing personal information about someone other than yourself is prohibited under the law.

# 4. INFORMATION WE COLLECT ON THIS WEBSITE

When you visit our website, you may be asked to enter your personal details including full name, email, contact number and other details for business or other purpose. We collect information about you if you make use of any of the interactive features within our website that rely on a personalized response, or where you ask us to respond to a query you have. The information we collect is limited to the details we need to provide the specific service you have asked for. We do not collect sensitive information, such as your political or religious beliefs, ethnic background, sexual preference or any other sensitive information. The types of information we collect includes:

- (i) Name, Contact Number, residential, business and postal addresses, E-mail Address, IP Address;
- (ii) Computer or mobile device information;
- (iii) Profile information, such as the username and password;
- (iv) Demographic details, such as date of birth, country of citizenship and/or country of residence, marital status;
- (v) Information about your net worth and/or income, such as your stated net worth; stated current, historical, and expected future income; source(s) of income; and supporting documentation that you choose to submit (e.g., tax forms, tax returns, pay stubs, financial account statements, and information about your financial assets and liabilities);
- (vi) Government-issued identification (to the extent permitted under applicable law), such as a national identification number (e.g., a Social Security Number, tax identification number, or passport number), state or local identification number (e.g., a Driver's License or other government-issued identification number), a copy of your government-issued identification card and related government issued photographs;
- (vii) Information about your investment experience and preferences, such as investment objectives, investment experience, liquidity needs, and risk tolerance;
- (viii) Financial Account and payment Information, such as your bank accounts you may use to source your investment funds, other related payment information and the crypto currency wallet addresses you may use to receive your tokens and revenue payout, if any;
- (ix) Information about your relationship to a company, such as your current occupation, job title and whether you are a beneficial owner or authorized signatory of the legal entity using the Service;
- (x) Feedback and correspondence, such as information you provide when you request information from us, receive customer support, or otherwise correspond with us, including by interacting with our pages on social networking online sites or services;

- (xi) Marketing information, such as your preferences for receiving marketing communications and details about how you engage with our marketing communications:
- (xii) Transaction Information: Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp.
- (xiii) Employment Information: Office location, job title, and/or description of role.
- (xiv) Social media information such as username or handle, preferences; and
- (xv) Other personal information in content/message you provide to us, such as through emails you send us.

**A.** Information that you voluntarily provide to us: You can visit our website without sharing your name and contact information. In certain places on this website, you may be asked to provide your name, address, contact information and/or email address to use our website. It is your option to provide the information requested. However, if you do not provide details that are essential, it would be impossible to use all of the features and functions of the website and/or to benefit from our services.

**B.** Information collected automatically: When you visit our website, our information technology systems automatically collect information about the equipment you are using and about your use of our website and services. Examples of the information we collect and analyze include the Internet Protocol (IP) address, location used to connect your mobile/computer to the Internet, the email address which you use to communicate with us, and your mobile/computer and connection information (for example, browser type, version, and time zone setting, browser plug-in types and versions, operating system, and platform). We may also use browser data such as cookies for fraud prevention and other purposes. We may use software tools to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (for example scrolling, clicks, and mouse-over), and methods used to browse away from the page. We may also collect technical information to help us identify your device for fraud prevention and for dealing with diagnostic purposes relating to our website.

C. Information collected from third party: We may also collect Personal Data from third party partners and public sources as required or permitted by applicable law, such as public databases, credit bureaus and ID verification partners for KYC which include:

- (i) Financial information
- (ii) Reputational information
- (iii) Corporate/business activities for corporate customers

We use ID verification partners for KYC. Our ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job position, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. In

some cases, we may process additional data about you to ensure our Services are not used fraudulently or for other illicit activities. In such instances, processing is necessary for us to continue to perform our contract with you and others.

# **Use of Google Analytics**

This website uses Google Analytics (including User tracking, as part of the Google Analytics Services), a web analysis service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"). Google Analytics uses cookies, which are text files placed on your computer/phone to enable website use to be analyzed. The information generated by the cookie concerning your use of this website (including your IP address) is sent to a Google server in the USA where it is saved. Google will use this information to analyze your use of the website, to compile reports on website activities for the website operators and to provide services associated with the use of the website and the internet. Google may also send this information to third parties where this is required by law or insofar as third parties process the data on behalf of Google. Google will under no circumstances link your IP address to other data from Google. Although you can adjust your browser software to prevent installation of the cookies, we would point out that if you do so, you might not be able to make full use of all the functions offered by this website. By using this website, you agree to the data about you collected by Google being processed as described above and for the above-mentioned purpose. --You can read more about how Google uses your Personal Information here: https://www.google.com/intl/en/policies/privacy/. You can also opt-out of Google Analytics here: https://tools.google.com/dlpage/gaoptout.

**D. Consent:** The Company obtains the explicit consent of users before collecting their personal data. By voluntarily providing personal information through quote forms, contact us forms, or any other information submission forms available on our website, individuals expressly consent to the collection, use, and processing of their personal data in accordance with this privacy policy. Users have the right to withdraw their consent at any time by contacting us. However, please note that the withdrawal of consent may impact the Company's ability to provide certain services or fulfill specific requests.

#### 5. HOW WE USE THIS INFORMATION

We may use the information described above to:

- i) send you quotes, promotional materials, newsletters and other communications;
- ii) Serve you relevant offers and ads;
- iii) respond to your inquiries;
- iv) perform data analyses;
- v) identify and verify customers using our Services in order to comply with anti-money laundering and terrorist financing laws across jurisdictions;
- vi) verify customer's identity by comparing the personal information provided against third-party databases and public records;

- vii) operate, evaluate and improve our business;
- viii) resolve any question, dispute, collected fees, or to troubleshoot problems;
- ix) protect against, identify and prevent fraud, copyright infringement, and other criminal activity;
- x) enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations; and
- xi) Comply with and enforce applicable legal requirements, relevant industry standards and our policies, including our Terms & Conditions.

We also may use the information in other ways for which we provide specific notice at the time of collection.

#### 6. ADVERTISING

We may work with online advertising companies to provide you with advertising which is tailored to your interests. These ads may be seen on our website. These ads may be based on information gathered as you browsed our website or based on your transactions with us. Our advertising partners collect information using cookies, web beacons, and other technologies which do not identify you personally.

# 7. WHAT ARE COOKIES?

Cookies are small text files sent to your browser and stored by your browser on your computer or other device by the websites that you visit, or by certain emails that you open. Cookies allow our websites to "remember you" when you return and allow us to deliver relevant page to you on our websites. Cookies save data such as your IP address or MAC address, the city associated with your IP or MAC address, the date and time you visited our website, pages you viewed, the URL of the website you viewed prior to visiting our website and the type of browser you use.

# 8. WHAT ARE THE DIFFERENT TYPES OF COOKIES?

Our website uses the following types of cookies:

- A. <u>Strictly necessary cookies</u>: These cookies are essential in order to enable you to move around the website and use its features. These are known as "First Party" cookies. Without these cookies, services like enabling appropriate content based on your type of device cannot be provided.
- B. <u>Functionality cookies</u>: These cookies allow our website to remember choices you make and provide enhanced, more personal features. The information these cookies collect may be removed and they cannot track your activity on the other website.

An HTTP Cookie cannot be used to get data from your hard drive, get your email address or steal sensitive information. We believe cookies to be harmless, and will eventually be to everyone's benefit (end users, as well as site builders) from the World Wide Web

Consortium: "Cookies cannot be used to steal information about you or your computer system." By using this website you consent to us deploying cookies as described above.

#### 9. HOW WE USE COOKIES TECHNOLOGY

We use cookies and similar technologies to:

- (i) Support the functioning of our websites;
- (ii) Enhance your experience on our websites by remembering your preferences;
- (iii) Understand how our websites are functioning and inform improvements to our websites and services; and
- (iv) Gather data that helps us to deliver information relevant to your interests.

#### 10. HOW TO MANAGE COOKIES

You can manage cookies on your computer or device through your browser settings. Please refer to your browser's "help" section for more information on how to delete saved cookies and allow or block cookies.

#### 11. DATA PROCESSING PARTNER AND LEGAL DISCLOSURE

We may share your information with third party service providers for KYC in connection with transaction with us. We may disclose your information to our business partners and if we have a good faith belief that the disclosure is required by law, is required in order to enforce the Terms and Conditions, or is necessary to detect, prevent or address fraud or security issues or to prevent harm to Company or others

#### 12. COMMUNICATIONS

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe instructions provided in any email we send.

#### 13. ACCESS

You may request access to the information we hold about you by contacting us. We will respond to your request within a reasonable time. We will provide you with access to the information we hold about you unless otherwise permitted or required by law. If we deny you access to the information, we will notify you of the basis for the denial unless an exception applies.

#### 14. CORRECTION

If you believe that personal information we hold about you is incorrect, incomplete or not current, you can update it through your account or may request that we update/ delete or correct your information by contacting us.

#### 15. SECURITY

Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our website as safe as possible. We use regular Malware Scanning. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive information you supply is encrypted. We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of their personal information. Although no method of transmission over the Internet, or method of electronic storage is one hundred percent secure, we strive to continually update and improve our security measures with the most recent technological developments.

# 16. LINKS TO OTHER WEBSITES (INCLUDING KYC)

Our Site may provide links to other websites for KYC or for your convenience and information. These websites may operate independently from us. Linked sites may have their own privacy notices or policies (including Terms and Conditions), which we strongly suggest you to review. To the extent any linked websites are not owned or controlled by us, we are not responsible for their content, any use of the websites, or the privacy practices of the websites.

#### 17. DATA TRANSFERS

Sometimes, we transfer information to third party contractors including persons in other State(s) or country assisting us in operating our website. By giving us your personal information, you consent to such disclosures. Where we transfer information to persons in other State or Country, we believe that the recipients of such information are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are similar in all material respects to international laws. We will protect that information as described in this Privacy Policy and will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in other State or countries other than the one in which you provided the information.

We may also share your information with certain other third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

#### 18. COMPLAINTS

If you have a complaint in relation to the collection, storage, use or disclosure of your personal information, please contact us.

# 19. User Rights under Privacy Laws

Users may exercise the following rights by submitting a request using the methods specified by the Company in the privacy notice. The method must take into account the ways in which users normally interact with the company, the need for secure and reliable communication relating to

the request, and the ability of the company to authenticate the identity of the user making the request. Company shall not require a consumer to create a new account in order to exercise consumer rights pursuant to this section but may require a consumer to use an existing account. A user may submit a request at any time specifying which of the following rights the user wishes to exercise:

- (i) Right to Opt-out: (i) a user has the right to opt out of the processing of personal data concerning the user for purposes of: (a) targeted advertising; (b) the sale of personal data; or (c) profiling in furtherance of decisions that produce legal or similarly significant effects concerning a user.
- (ii) **Right of Access:** a user has the right to confirm whether company is processing personal data concerning the user and to access the user's personal data.
- (iii) **Right to Correction:** a user has the right to correct inaccuracies in the user's personal data, taking into account the nature of the personal data and the purposes of the processing of the user's personal data.
- (iv) Right to Deletion: a user has the right to delete personal data concerning the user.
- (v) Right to Data Portability: when exercising the right to access personal data, a user has the right to obtain the personal data in a portable and, to the extent technically feasible, readily usable format that allows the user to transmit the data to another entity without hindrance. Nothing in this act requires a company to provide the data to the user in a manner that would disclose the company's trade secrets.

#### 20. USE OF INFORMATION OUTSIDE YOUR COUNTRY OF RESIDENCE

At this time, some or all of the data in the service is stored and processed in the State of Delaware, United State. Your use of the website represents your consent and agreement to these practices.

#### 21. CHANGES TO THIS POLICY

We reserve the right to revise this policy or any part of it from time to time. Please review this policy periodically for changes.

# 22. CONTACT US [FOR NOTICE AND OTHER COMMUNICATIONS] ESTATE PROTOCOL

1201 Orange Street, Suite 600, City of Wilmington, County of New Castle,
Delaware, USA
Support Email: team@estateprotocol.com