

Privacy Policy

LAST UPDATED: March 2024

IMPORTANT NOTICE: THIS AGREEMENT IS SUBJECT TO BINDING ARBITRATION AND A WAIVER OF CLASS ACTION RIGHTS AS DETAILED BELOW. PLEASE READ THE AGREEMENT CAREFULLY.

PLEASE ALSO SEE SWIFTID PRIVACY POLICY [HERE](#).

Use of the words “cmorq,” “we,” “us,” or “our” refer to cmorq inc. and its affiliates. This Privacy Policy explains what Personal Information (as defined below) we collect, why we collect it, how we use and disclose it.

Your privacy matters to us, so please take the time to get to know and familiarize yourself with our policies and practices. Feel free to print and keep a copy of this Privacy Policy, but please understand that we reserve the right to change any of our policies and practices at any time. But don't worry, you can always find the latest version of this Privacy Policy [here](#).

1. Personal Information We Collect

As used herein, “Personal Information” means information that identifies or is reasonably capable of identifying an individual, directly or indirectly, and information that is being associated with an identified or reasonably identifiable individual.

A. Personal Information we collect from you

We may collect your name, address, telephone number, and email address directly from you. We may also keep an encryption of your wallet password, for recovery purposes.

B. Personal Information we collect automatically

We may collect the following categories of Personal Information automatically through your use of our services:

Online Identifiers, such as IP address and domain name;

Device Information, such as hardware, operating system, browser;

Usage Data, such as system activity, internal and external information related to cmorq pages that you visit, clickstream information; and

Geolocation Data.

Our automatic collection of Personal Information may involve the use of Cookies, described in greater detail below.

C. Personal Information we collect from third parties

We may collect and/or verify the following categories of Personal Information about you from Third Parties:

Transaction Information, such as public blockchain data (bitcoin, ether, and other Digital Assets) are not truly anonymous. We, and any others who can match your public Digital Asset address to other Personal Information about you, may be able to identify you from a blockchain transaction because, in some circumstances, Personal Information published on a blockchain (such as your Digital Asset address and IP address) can be correlated with Personal Information that we and others may have. Furthermore, by using data analysis techniques on a given blockchain, it may be possible to identify other Personal Information about you.

Personal Information you provide during the registration process may be retained, even if your registration is left incomplete or abandoned.

D. Accuracy and retention of Personal Information

We take reasonable and practicable steps to ensure that your Personal Information held by us (i) is accurate with regard to the purposes for which it is to be used, and (ii) is not kept longer than is necessary for the fulfillment of the purpose for which it is to be used. BSA mandates us that records be retained for at least a period of 5 years after the relation ends

2. How We Use Your Personal Information

The Personal Information we collect and the practices described above are done in an effort to provide you with the best experience possible, protect you from risks related to improper use, and help us maintain and improve cmorq. We may use your Personal Information to:

A. Provide you with our services. We use your Personal Information to provide you with our services.

B. Comply with legal and regulatory requirements. We process your Personal Information as required by applicable laws and regulations.

C. Detect and prevent fraud. We process your Personal Information to detect and prevent fraud.

D. Protect the security and integrity of our services. We use your Personal Information to maintain the security of your account.

E. Provide you with customer support. We process your Personal Information anytime that you reach out to our Customer Support team with issues arising from your account.

F. Optimize and enhance our services. We use your Personal Information to understand how our products and services are being used to help us improve our services and develop new products.

G. Market our products to you. We may contact you with information about our products and services. We will only do so with your permission, which can be revoked at any time.

H. Other business purposes. We may use your information for additional purposes.

I. In some circumstances we may anonymize your personal information (so that it can no longer be associated with you) in which case we may use this information indefinitely without further notice to you.

3. How We Share Your Personal Information

We will not share your Personal Information with third parties, except as described below:

A. Service Providers. We may share your Personal Information with third-party service providers for business or commercial purposes. Your Personal Information may be shared so that they can provide us with services, including security threat detection, payment processing, customer support, data analytics, Information Technology, advertising, marketing, data processing, and network infrastructure. We share your Personal Information with these service providers only so that they can provide us with services. Our third-party service providers are subject to strict confidentiality obligations.

B. Affiliates. We may share your Personal Information with our affiliates, for the purposes outlined above, and as it is necessary to provide you with our services.

C. Law Enforcement. We may be compelled to share your Personal Information with law enforcement, government officials, and regulators.

D. Corporate Transactions. We may disclose Personal Information in the event of a proposed or consummated merger, acquisition, reorganization, asset sale, or similar corporate transaction, or in the event of a bankruptcy or dissolution.

E. Professional Advisors. We may share your Personal Information with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.

F. Consent. We may share or disclose your information with your consent.

If we decide to modify the purpose for which your Personal Information is collected and used, we will amend this Privacy Policy.

4. Cookies

When you access cmorq, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit cmorq. We use Cookies to help us recognize you as a customer, collect information about your use of cmorq to better customize our services and content for you, and collect information about your computer or other access devices to: (i) ensure compliance with our Bank Secrecy Act ("BSA") and anti-money laundering ("AML") program ("BSA/AML Program") (ii) ensure that your account security has not been compromised by detecting irregular, suspicious, or potentially fraudulent account activities; (iii) assess and improve our services and advertising campaigns.

You also can learn more about cookies by visiting <https://www.allaboutcookies.org>, which includes additional useful information on cookies and how to block cookies on different types of browsers and mobile devices. Please note that if you reject cookies, you will not be able to use some or all of cmorq. If you do not consent to the placing of Cookies on your device, please do not visit, access, or use cmorq.

5. Information Security

No security is foolproof, and the Internet is an insecure medium. We cannot guarantee absolute security, but we work hard to protect you and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Information we collect and store. Measures we take include; periodic review of our Personal Information collection, storage, and processing practices; and restricted access to your Personal Information on a need-to-know basis for our employees, contractors and agents who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

6. Information For California Residents

We are required under the California Consumer Privacy Act of 2018 (“CCPA”) to provide certain information to California residents about how we collect, use and share their personal information, and about the rights and choices California residents may have concerning their personal information. For purposes of this section, “personal information” has the meaning provided in the CCPA.

Personal information that we collect, use, and share

For ease of reference, we have compiled the chart below to demonstrate how we use the categories of personal information we have collected, used, and disclosed in the past 12 months. We do not “sell” any personal information, as “selling” is defined under the CCPA.

CATEGORY OF PERSONAL INFORMATION	SOURCE(S) OF PERSONAL INFORMATION	WHY WE COLLECT YOUR PERSONAL INFORMATION	HOW WE SHARE YOUR PERSONAL INFORMATION
Identifiers such as Personal Identification Information	Sections 1.A, 1.B, 1.C	Sections 2.A, 2.B, 2.C, 2.D, 2.E, 2.F, 2.G, 2.H	Sections 3.A, 3.B, 3.C, 3.D, 3.E, 3.F
Commercial information such as records of products or services purchased, obtained, or considered	Sections 1.A, 1.C	Sections 2.A, 2.B, 2.C, 2.E, 2.F	Sections 3.A, 3.B, 3.C, 3.D, 3.E, 3.F
Internet or other electronic network activity information, including browsing history and search history	Section 1.B	Sections 2.A, 2.B, 2.C, 2.F	Sections 3.A, 3.B, 3.C, 3.D, 3.E, 3.F

California privacy rights

California consumers have the following rights under the CCPA with respect to their Personal Information. Please understand, however, that these rights are not absolute, and we may decline requests as permitted under applicable law.

Right to Request Access. You may submit a request that cmorq disclose the categories and specific pieces of personal information that we have collected, used, or disclosed about you in the past 12 months.

Right to Request Deletion. You may submit a request that cmorq delete the personal information that we have about you.

Right to Opt out of Sale of Personal Information. cmorq does not sell your Personal Information.

Right Not to Receive Discriminatory Treatment. You have the right to exercise the privacy rights conferred by the CCPA without discriminatory treatment.

You may submit a request to correct, access or delete your personal information by emailing us at privacy@cmorq.com. We are legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity. If you submit a request to delete your personal information, you will also be required to confirm the deletion request by email.

You may designate an authorized agent to make a request under the CCPA on your behalf. Your authorized agent must submit proof that you have provided them with power of attorney pursuant to Probate Code sections 4000 to 4465. We may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf.

Please understand that we are not obligated to provide you with a copy of your personal information more than twice in a 12-month period.

Information from children under thirteen (aka the “Dinesh” clause)

We do not knowingly collect information online from children under 13. If you are a parent or guardian and you learn that your children have provided cmorq with Personal Information, please contact us at compliance@cmorq.com. If we become aware that it has collected Personal Information from a child under age 13 without verification of parental consent, we will take steps to remove that information from our servers.

7. Information For Persons Subject To EU Data Protection Law

For customers who are located in the European Economic Area (“EEA”), United Kingdom, Channel Islands, or other locations subject to EU data protection law (collectively, “European Residents”), we adhere to relevant EU data protection laws. For purposes of this section, “personal data” has the meaning provided in the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

Lawful bases for processing

We process personal data subject to GDPR on one or more of the following legal bases:

Legal Obligation: to conduct anti-fraud and identity verification and authentication checks and to fulfill our retention obligations;

Contractual Obligation: to satisfy our obligations to you, including to provide you with our services and customer support services, and to optimize and enhance cmorq;

Legitimate Interest: to monitor the usage of cmorq, conduct automated and manual security checks of our service, to protect our rights; and

Consent: to market cmorq and our services to you. You may withdraw your consent at any time without affecting the lawfulness of processing based on consent before consent is withdrawn.

European privacy rights

European Residents have the following rights under GDPR, subject to certain exceptions provided under the law, with respect to their personal data:

Rights to Access and Rectification. You may submit a request that cmorq disclose the personal data that we process about you and correct any inaccurate personal data.

Right to Erasure. You may submit a request that cmorq delete the personal data that we have about you.

Right to Restriction of Processing. You have the right to restrict or object to our processing of your personal data under certain circumstances.

Right to Data Portability. You have the right to receive the personal data you have provided to us in an electronic format and to transmit that Personal Information to another data controller.

When handling requests to exercise European privacy rights, we check the identity of the requesting party to ensure that he or she is the person legally entitled to make such request. While we maintain a policy to respond to these requests free of charge, should your request be repetitive or unduly onerous, we reserve the right to charge you a reasonable fee for compliance with your request.

Collection and transfer of data outside the EEA

cmorq operates internationally with many of our systems based in the United States. When we transfer your personal data to our affiliates outside the EEA, we make use of standard contractual clauses which have been approved by the European Commission. We may transfer personal data from Europe to third countries outside of Europe, including the United States, under the following conditions:

Contractual Obligation. Where transfers are necessary to satisfy our obligation to you, including to provide you with our services and customer support services, and to optimize and enhance cmorq; and

Consent: where you have consented to the transfer of your personal data to a third country.

Where transfers to a third country are based on your consent, you may withdraw your consent at any time. Please understand, however, that our services may not be available if we are unable to transfer personal data to third countries.

When we transfer personal data to third countries, we endeavor to ensure adequate safeguards are implemented, for example through the use of standard contractual clauses or Privacy Shield certification.

Automated decision-making

We may engage in automated decision-making for purposes of fraud detection and prevention.

8. Contact Us

If you have questions or concerns regarding this policy or our processing of your Personal Information, please feel free to email us at: support@cmorq.com