

Privacy Policy

This privacy policy ("Privacy Policy") outlines the privacy practices of Daba Markets INC. and its affiliates, including Daba Technologies LLC, Daba Advisors LLC, Daba Portal LLC, Daba Securities LLC, and Daba Fund Advisors LLC. The objective of this policy is to inform users of their rights and obligations regarding the collection, processing, and disclosure of their Personal Information on the unified investment platform provided by Daba.

Definitions

In this Privacy Policy, a "user" or "you" refers to any individual or entity that falls under the following categories:

Visitors of Daba and its affiliates' websites.

Individuals who interact with Daba or its Services.

Individuals who create an account on the Daba Platform, including "Issuers" and "Investors" (collectively, "Users"). By accessing our services, you acknowledge and consent to the privacy practices outlined below.

Data Collection and Retention

Daba may collect the following Personal Information from Investors and Registered Issuers:

- Legal physical address;
- Telephone number;
- Date of birth;
- Business name, address, email, phone number, and names of owners and management (for Investors);
- Tax ID number or social security number, citizenship status, and state or country of formation for investment entities (for Investors); and
- Responses to profile creation questions and other inquiries required for identity validation (e.g., driver's license information) and preparation of offering materials.

Certain Personal Information subject to record retention requirements, under SEC and FINRA rules and regulations, will be retained for at least 7 years for legal and compliance purposes, as well as with respect to relevant statutes of limitations.

Purpose of Data Use

We use Registered User Information to:

- Provide the Services;
- Communicate with you and send relevant market intelligence communications;
- Keep your account secure and protect our Platform and other Users;
- Analyze your investment preferences and behavior to provide tailored content and communications; and
- Determine demographics of platform usage.

We use Investor and Issuer Information to:

- Verify identity and status with respect to securities and other laws;
- Facilitate payments and escrow of funds;
- Record investments and fulfill notification and reporting requirements with relevant regulatory authorities ;
- Provide necessary tax reporting information;
- Fulfill other purposes as may be required by law.

We use Daba Event Attendee Information to:

- Communicate with you and respond to your event registration;
- Provide necessary event information; and
- Send post-event communications.

Lawful Basis for Processing

We process Personal Information based on the following lawful bases:

- Consent: When you provide consent for specific purposes.
- Contract: When processing is necessary for the performance of a contract.
- Legal Obligation: When processing is required for compliance with a legal obligation.
- Legitimate Interests: When processing is necessary for our legitimate interests or those of third parties.

Sharing and Disclosure of Personal Information

Daba may share Personal Information with the following categories of third parties, as required by relevant securities laws and obligations:

- Daba Markets INC - Affiliates and Subsidiaries for supporting common business objectives.
- Service Providers for specific purposes like payment processing, web services, security, storage, and analytics.
- Business Services Providers for the operation of our business and facilitation of the Services.
- Government and Legal Authorities as required by applicable law, regulation, or legal process.

Communications and Marketing

We will periodically send emails regarding Services and new opportunities. You can opt-out of promotional or marketing email communications by clicking the unsubscribe link, accessing your notification settings, or contacting us at info@joindaba.com.

Information Security and Breach Notification

We take reasonable measures to protect your Personal Information and will notify you of any data breaches as required by applicable laws and regulations.

General Inquiries and Updates

For inquiries or privacy complaints, please contact us at info@joindaba.com or at the address provided below. This Privacy Policy may be updated, so please check back regularly for changes.

Daba Legal and Compliance Team
1000 Brickell Ave Ste, 715 PMB 1469,
Miami Florida, USA.

Effective Date: [Insert Effective Date] (Date of last update)