

## **Banxa – Global Privacy and Cookies Policy**

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Banxa operates internationally through different entities (together “**Banxa**,” “**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 Banxa 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 – 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**.

**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. PERSONAL INFORMATION WE COLLECT**

The categories of personal information we collect 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**

We may collect personal information that you provide to us, as described below.

- **Account Administration.** We may collect personal information from you in connection with the administration of your account. This personal information may include, but is not limited to, 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, 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.

- **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.
- **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.
- **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.
- **Interactive Features.** We and others who use our Services 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, and is not subject to the privacy protections referenced herein.
- **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.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from you when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from you and third parties to assess and pursue potential business opportunities.
- **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.

## **B. Personal Information Collected Automatically**

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

- **Automatic Collection of Personal 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.
- **Cookie Policy (and Other 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, 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;
- **Advertising- or Targeting-Related.** We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our Services or on third-party digital properties.

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding these Technologies.

- **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](#).
- **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 our service providers to facilitate these purposes. Where required by law, we will delete your biometric information within three years from your last interaction with the Services.

### 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.

- **Credit Bureaus and ID Verification Partners.** We may obtain personal information about you from credit bureaus and identity verification partners.
- **Blockchain Information.** We may obtain personal information about you through our analysis of blockchain 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 co-worker).

### **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;
- Sharing personal information with third parties 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 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 clearly disclosed to you at the time you provide 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. Banxa’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.

## 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 share your personal information are described below.

- **Service Providers.** We may share your personal information with 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 Banxa may provide personal information

to is Sift Science, Inc. (“**Sift**”). Sift may use personal information to detect and prevent fraud, security threats, other illegal or malicious behavior, and for other purposes set forth in the Sift Service Privacy Notice.

- **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 – Sila and Evolve.** Some of the Third-Party Services Banxa allows you to interact with include the financial services software company Sila Inc. (“**Sila**”) and banking services provider Evolve Bank & Trust (“**Evolve**”), member FDIC, which offer you electronic fund transfers (EFTs). When you create a Banxa account, link a bank account, or initiate an EFT, you are authorizing us to share your identity and banking information with Sila and Evolve to support your account. To the fullest extent permitted by applicable law, you are also acknowledging and/or agreeing to the terms of Sila’s privacy policy, <https://silamoney.com/privacy-policy/>, Evolve’s privacy policy, <https://www.getevolved.com/privacy-policy/>, and Evolve’s communications consent and disclosure, <https://silamoney.com/evolve-electronic-communications-consent-and-disclosure/> (“**Sila and Evolve Terms**”). It is your responsibility to make sure the personal information you provide us is accurate and complete, which is necessary for our partners to process EFTs on your behalf. The Sila and Evolve Terms may be modified from time to time, and the governing versions are incorporated by reference into this Privacy Policy. Any term not defined in this section but defined in the Sila and Evolve Terms assumes the meaning as defined in the Sila and Evolve Terms. IT IS YOUR RESPONSIBILITY TO READ AND UNDERSTAND THE SILA AND EVOLVE TERMS BECAUSE THEY CONTAIN TERMS AND CONDITIONS CONCERNING YOUR BANXA ACCOUNT, INCLUDING BUT NOT LIMITED TO USE OF YOUR PERSONAL INFORMATION.
- **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 Banxa 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 share your personal information with 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.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of

delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”

- **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.

## **5. 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.** In accordance with applicable law, you may have the right to:

- **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; and
- **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.

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).

## **6. SECURITY OF YOUR INFORMATION**

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information.

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.

## **7. 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](#).



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

## 8. **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.

## 9. **SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS**

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“CCPA”). The CCPA provides California residents with the right to know what categories of personal information Banxa has collected about them, and whether Banxa disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

Category of Personal Information Collected by Banxa	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> <li>● Advertising partners</li> </ul>
<b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> </ul>
<b>Protected classification characteristics under California or federal law</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> </ul>
<b>Commercial information</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> </ul>
<b>Biometric information</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Affiliates</li> </ul>
<b>Internet or other electronic network activity</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> <li>● Advertising partners</li> </ul>
<b>Geolocation data</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> </ul>
<b>Sensory data</b>	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> </ul>
<b>Professional or employment-related information</b>	<ul style="list-style-type: none"> <li>● Service providers</li> </ul>

Category of Personal Information Collected by Banxa	Category of Third Parties Personal Information is Disclosed to for a Business Purpose
	<ul style="list-style-type: none"> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> </ul>
Inferences drawn from other personal information to create a profile about a consumer	<ul style="list-style-type: none"> <li>● Service providers</li> <li>● Third-Party Services you share or interact with</li> <li>● Affiliates</li> <li>● Advertising partners</li> </ul>

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in [“Personal Information We Collect”](#) and [“How We Use Your Personal Information”](#) above, respectively.

**Additional Privacy Rights for California Residents**

**“Sales” of Personal Information under the CCPA.** For purposes of the CCPA, Banxa does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

**Non-Discrimination.** California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.

**Authorized Agent.** Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth in [“Contact Us”](#) below for additional instructions.

**Verification.** To protect your privacy, we will take steps to reasonably verify your identity before fulfilling your request. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, or to answer questions regarding your account and use of our Services.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in [“Contact Us”](#) below. We will process such requests in accordance with applicable laws.

**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.

**10. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. Please note that we do not currently sell your personal information as contemplated under Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth in [Contact Us](#) below.

**11. SUPPLEMENTAL NOTICE FOR VIRGINIA RESIDENTS**

This Supplemental Notice for Virginia residents only applies to our processing of personal information that is subject to the Virginia Consumer Data Protection Act (“**VCDPA**”). The VCDPA provides Virginia residents with the right to know what categories of personal information Banxa has collected about them, and whether Banxa disclosed that personal information for a business purpose (e.g., to a service provider). Virginia residents can find this information in [“Personal Information We Collect”](#) and [“How We Use Your Personal Information”](#) above, respectively.

**“Sales” of Personal Information under the VCDPA.** For purposes of the VCDPA, Banxa does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 13 years of age.

**Non-Discrimination.** Virginia residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the VCDPA.

**Authorized Agent.** Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth in “[Contact Us](#)” below for additional instructions.

**Verification.** To protect your privacy, we will take steps to reasonably verify your identity before fulfilling your request. These steps may involve asking you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, or to answer questions regarding your account and use of our Services.

**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.

**Exercise of VCDPA Rights.** If you are a resident of Virginia, you have the right to:

- confirm whether or not we are processing your personal data and to access such personal data;
- correct inaccuracies in your personal data, taking into account the nature of the personal data and the purposes of the processing of your personal data;
- delete personal data provided by or obtained about you;
- obtain a copy of your personal data that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another controller without hindrance, where the processing is carried out by automated means; and
- opt out of the processing of the personal data for purposes of:
  - targeted advertising;
  - the sale of personal data; or
  - profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

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).

**Appeal Process.** If you exercise any of the above rights under the VCDPA 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 the Attorney General to submit a complaint at: <https://www.oag.state.va.us/consumer-protection/index.php/file-a-complaint>

## 12. 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 Banxa’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
<b>Account administration</b>  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	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 sub b 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 sub c GDPR)	As long as the applicable legal obligation dictates.  <u>Tax legislation</u> In UK, LU and LV: 10 years. In NL: 7 years  <u>Anti-money laundering</u> 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
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 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 sub f GDPR)	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 sub a GDPR)	Until you withdraw your consent
<b>Financial and transactional information</b>  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 sub b 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 sub c GDPR)	As long as the applicable legal obligation dictates <u>Tax legislation</u> In UK, LU and LV: 10 years. In NL: 7 years  <u>Anti-money laundering</u> 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 communications with us	To answer your questions and to provide our Services	Necessary for the performance of our contract (art. 6.1 sub b GDPR)	1 year after closing your account
	To document our rights and obligations towards you	Necessary for the purposes of a legitimate interest (art. 6.1 sub f 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 sub a 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 sub b GDPR)	1 year after closing your account
	If you publicly post something on our Interactive Features: to	Your consent (art. 6.1 sub a GDPR)	Until you withdraw your consent

Category of data	Processing goals	Processing grounds	Retention term
	share information for the benefit of others who take an interest in our services and our Interactive Features		
Information you provide at conferences, trade shows or other events	For market research, in order to develop our business and enhance our services	Necessary for the purposes of our legitimate interest (art. 6.1 sub f GDPR), 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
	To contact you, e.g. with questions or offers connected to the expertise or interests you displayed at 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 sub a 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, 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.	To allow our computers to recognize your device and communicate with it, in order to perform our Services	Necessary for the performance of our contract (art. 6.1 sub b GDPR)	For the duration of your session
	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 sub f GDPR)	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 sub a 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 sub a 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	To better understand the way people use our Services, so that we can improve on them	Your consent (art. 6.1 sub a GDPR)	2 years, or until you withdraw your consent; whichever is sooner

Category of data	Processing goals	Processing grounds	Retention term
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 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 sub a 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 sub a 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 sub b 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 sub a 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 sub b 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 sub c GDPR)	As long as the applicable legal obligation dictates <u>Tax legislation</u> In UK, LU and LV: 10 years. In NL: 7 years <u>Anti-money laundering</u> 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 sub f 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 sub c GDPR)	As long as the applicable legal obligation dictates <u>Tax legislation</u> In UK, LU and LV: 10 years. In NL: 7 years <u>Anti-money laundering</u> In UK, LU and NL: 5 years after the end of your

Category of data	Processing goals	Processing grounds	Retention term
			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 sub f GDPR)	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 sub a GDPR)	Until you withdraw your consent
	To monitor the effect of our referral service	Our legitimate interest (art. 6 sub f GDPR)	2 years after the referral

### 13. **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.

### 14. **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](#)



## 15. CONTACT US

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

Where you reside	Services and/or Payment Method	Banxa entity you are contracting	Banxa entity contact information	Governing law and venue
<b>Default – Anywhere unless expressly identified elsewhere in this table</b>	All	EU Internet Ventures B.V.	Piet Heinkade 93 B, 1019GM Amsterdam, Netherlands 70850984 <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Amsterdam, Netherlands
<b>Australia</b>	All	Global Internet Ventures Pty Ltd	Level 2, 2-6 Gwynne Street, Cremorne VIC 3121, Australia <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Victoria, Australia
<b>Brazil</b>	PIX	Global Internet Ventures Pty Ltd	Level 2, 2-6 Gwynne Street, Cremorne VIC 3121, Australia <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Victoria, Australia
<b>Canada</b>	Bank / Wire	Richmond Internet Ventures Corporation	Suite 1103, 11871 Horseshoe Way, Richmond BC V7A 5H5, Canada <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	British Columbia, Canada
<b>Mexico</b>	Cash and Bank / Wire	Global Internet Ventures Pty Ltd	Level 2, 2-6 Gwynne Street, Cremorne VIC 3121, Australia <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Victoria, Australia
<b>South Africa</b>	Bank / Wire	Global Internet Ventures Pty Ltd	Level 2, 2-6 Gwynne Street, Cremorne VIC 3121, Australia <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Victoria, Australia
<b>Turkey</b>	Bank / Wire	BNXA Teknoloji Anonim Sirketi	Dikilitas Mahallesi, Ayazmadere Caddesi, No: 6-1/16, Elit Fulya Plaza, Besiktas, Istanbul, Turkey <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Istanbul, Turkey
<b>United States of America</b>	Certain Bank / Wire transactions	Global Internet Ventures Pty Ltd	Level 2, 2-6 Gwynne Street, Cremorne VIC 3121, Australia <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Victoria, Australia
<b>United States of America</b>	Certain Card transactions	EU Internet Ventures B.V.	Piet Heinkade 93 B, 1019GM Amsterdam, Netherlands 70850984 <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Amsterdam, Netherlands
<b>United States of America</b>	All (unless expressly identified elsewhere in this table)	BNXA USA MTL Inc.	1 East Liberty Street, Suite 600, Office 16, Reno, NV USA 89501 <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Nevada, U.S.A.
<b>Vietnam</b>	Bank / Wire	Global Internet Ventures Pty Ltd	Level 2, 2-6 Gwynne Street, Cremorne VIC 3121, Australia <a href="mailto:privacy@banxa.com">privacy@banxa.com</a>	Victoria, Australia

The Banxa entity (or entities) you are contracting with (each a “**Banxa Party**”) is the controller of the personal information processed under this Privacy Policy. However, the Banxa Party may also disclose your personal information to other Banxa 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-LEECH-BLILEY ACT (“GLBA”) PRIVACY NOTICE**

- 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 BANXA 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?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Name, date of birth, age, nationality, country of residence, gender, occupation, signature, professional details, social security number, and driver’s license or ID number.</li> <li>▪ Wallet address and wallet transactions</li> <li>▪ Banking information</li> </ul>
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 Banxa chooses to share; and whether you can limit this sharing.

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

<b>To limit our sharing</b>	<ul style="list-style-type: none"> <li>■ Call +1 800-909-9664 or</li> <li>■ Visit us online: <a href="http://www.banxa.com">www.banxa.com</a></li> </ul> <p><b>Please note:</b></p> <p>If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>
<b>Questions?</b>	Call +1 800-909-9664 or go to <a href="http://www.banxa.com">www.banxa.com</a>

<b>Who we are</b>	
<b>Who is providing this notice?</b>	BNXA USA MTL Inc.
<b>What we do</b>	
<b>How does Banxa protect my personal information?</b>	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.
<b>How does Banxa collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ Open an account with us.</li> <li>■ Use our services.</li> </ul> <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
<b>What happens when I limit sharing for an account I hold jointly with someone else?</b>	Your choices will apply to everyone on your account.
<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include financial companies such as:</p> <ul style="list-style-type: none"> <li>■ Banxa Holdings Inc.</li> <li>■ BTC Corporation Holdings Pty Ltd</li> <li>■ BNXA USA Holding Inc.</li> <li>■ BNXA USA MTL Inc.</li> </ul>

	<ul style="list-style-type: none"> <li>■ BNXA USA Operating Inc.</li> <li>■ BNXA USA NV Inc.</li> <li>■ Global Internet Ventures Limited</li> <li>■ Banxa.com Pty Ltd</li> <li>■ BC Cloud Mining Pty Ltd</li> <li>■ LT Internet Ventures UAB</li> <li>■ Rhino Loft Pty Ltd</li> <li>■ BNXA Teknoloji Anonim Sirketi</li> <li>■ Richmond Internet Ventures Corporation</li> <li>■ Internet S.G. Ventures Pte Ltd</li> <li>■ E.U Internet Ventures B.V.</li> <li>■ BNXA UK Holding Limited</li> <li>■ BNXA UK VASP Limited</li> <li>■ BNXA Brazil LTDA</li> <li>■ BNXA PHL Inc</li> </ul>
<b>Nonaffiliates</b>	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.
<b>Joint marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.