

PRIMESTACK PTE. LTD.

Privacy Policy

JULY 2020

Legal & Compliance Team

PRIMESTACK PTE. LTD. | 105 CECIL STREET, #07-02, THE OCTAGON, SINGAPORE 069534

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PRIMESTACK PTE. LTD.

INTRODUCTION

We at PRIMESTACK PTE. LTD., of 105 Cecil Street, #07-02, The Octagon, Singapore 069534, recognize that your privacy is very important and we take it seriously. This Privacy Policy (“**Privacy Policy**”) describes the Company’s policies and procedures on the collection, use and disclosure of your information pursuant to your use of the Company’s website (available at www.coindcx.com) and related mobile and software applications, whether existing now or in future (collectively, the “**Online Platforms**”). The Company is committed to ensuring that any use or sharing of your information with anyone shall be one only in accordance with the procedures described in this Privacy Policy.

The terms “We”, “Our”, “CoinDCX”, “Company”, “Platform” and “Us” refers to the Company, its subsidiaries, affiliated entities, permitted assigns (as and when applicable) and the terms “User”, “You” and “Your” refer to a User of our Online Platforms. The capitalized terms used in this Privacy Policy, but not defined in this Privacy Policy, shall have the meaning given to such terms in the Terms (defined hereinafter).

Please read this Privacy Policy before using the site or submitting any personal data. By using the Online Platforms, it shall be deemed that you are expressly consenting to be bound by the terms and conditions described in this Privacy Policy.

PRIVACY POLICY IS PART OF OUR TERMS

This Privacy Policy is a part of and incorporated within, and is to be read along with the Terms & Conditions of our platform (the “**Terms**”). You may view these Terms on any of our Online Platforms.

PRIVACY POLICY CHANGES

The Company may change and update this Privacy Policy from time to time. We will use commercially reasonable efforts to generally notify all users of any material changes to this Privacy Policy, however, you should look at this Privacy Policy regularly to check for such changes. We will also update the “Last Updated” and “Effective” date at the top of this Privacy Policy, which reflects the effective date of such policy. Your continued access to or use of the Services after the date of the updated Privacy Policy constitutes your acknowledgment and agreement that you have read, understood and accepted the terms of the updated Privacy Policy. If you do not agree to the updated Privacy Policy, you must stop accessing or using the Platform and/or the Services. Any changes will only apply to activities and information on a going forward and not retroactive basis. You are encouraged to review this Privacy Policy whenever you access our Online Platforms to make sure that you understand how any personal data you provide will be used.

LINKS TO OTHER WEBSITES

The procedures and practices set forth in this Privacy Policy describe the use and disclosure of information collected only through the Online Platforms. These Online Platforms may contain links to other websites. Any personal data about you collected whilst visiting such websites is not governed by this Privacy Policy. You are encouraged to exercise caution and review the privacy policies applicable to such websites before accessing

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them. You acknowledge that the Company shall not be responsible for and has no control over the practices and content of any website accessed using the links contained on our Online Platforms.

VOLUNTARY DISCLOSURE TO THIRD PARTIES

This Privacy Policy shall not apply to any information voluntarily disclosed by you to other Users of our Online Platforms or third parties other than Selected Third Parties (defined hereinafter).

COMPETENCY TO CONTRACT

This Privacy Policy is not applicable to Users who are minors or otherwise incompetent to contract. Such Users must not provide us or other visitors with any personal data. You acknowledge that the Company shall not be responsible for and has no control over any information submitted by such Users on our Online Platforms.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- a. **Information You Give Us** – You may be required to give us sensitive personal data about yourself while creating an Account, or by corresponding with us by phone, e-mail chat or otherwise. This includes information voluntarily provided by you including but not limited to when you register to use the Online Platforms, activate your Account, use any of our Services, transfer any funds from/to your Linked Bank Account, or when we troubleshoot problems reported by you. The information you give us may include without limitation your name, photograph, postal address, e-mail address and phone number, Govt. Issued Identity Details (i.e. Aadhaar Number), information about/images of your Tax Identification Details (i.e. Permanent Account Number - PAN card) and other identification documents, financial and credit card information, details of your Linked Bank Account and digital assets wallets held on third party exchanges/websites, location details or other information requested by us to detect and protect against frauds and similar criminal activity and such other information required by us from time to time for providing the Services. We may also occasionally require you to participate in optional surveys. Your personal data may be collected through such surveys. We may also require additional information about you for performing ongoing due diligence (necessitated under the applicable law) based on your risk assessment, transaction value, etc.

You must ensure that all your data and/or information shared with us is accurate, correct and complete, at all times. You understand that you must promptly inform us of any changes to your data and/or information which may impact your use of our Services. We shall not be liable or responsible for any loss or damage that may occur to you or other third parties on account of provision of incorrect data and/or information provided by a User.

- b. **Information We Collect About You** – With regard to each of your visits to any of the Online Platforms, we may automatically collect and analyse the following demographic and other information:
 - Technical information, including the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and other similar information.
 - Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from the Online Platforms (including date and time); information about

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transactions and trades executed or attempted to be executed by you; material or information that you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- Information relating to fund transfer requests executed by you while accessing Services through our Online Platforms. In such transactions, we may collect information relating to such transactions provided by you or by a Selected Third Party.
- Metadata is usually technical data associated with the content you submit, post or share on the Website. Users can add or may have metadata added to their content including geolocation, date, attribution, or other data.

- c. **Information We Receive from Other Sources** – We may receive information about you if you use any of the other websites/apps we operate or the other Services we provide. Such data may be shared internally and combined with data collected through use of the Online Platforms. We also work closely with select third parties (including, for example, subcontractors such as advertising networks, analytics providers, search information providers) and may receive information about you from such sources. We collect non-personally identifiable information to track the total number of visitors to the Online Platforms in aggregate form and identify the type of Internet web browser (e.g., Google Chrome®) and operating system (e.g., Windows®) used by the visitor. This information allows us continuously to improve the Online Platforms and Services.

YOUR CONSENT

By using any of the Online Platforms, you agree and consent to the collection and use of information collected in the manner described above and in accordance with this Privacy Policy. You also agree and consent to any changes made to this Privacy Policy in due course and without notice. If you do not agree with the terms and conditions of this Privacy Policy, please do not provide any information to us. If you refuse or withdraw your consent, or if you choose not to provide us with any information as required by us, we may not be able to provide you with the Services that are being offered through the Online Platform.

USE OF COOKIES

Our Online Platforms use cookies and tracking technology (including pixels) depending on the features offered. Cookies are small files that are placed on your device (either temporarily or until manually deleted by you) in order to distinguish you from other Users of our Online Platforms. We also use local storage to provide you with a customised experience when you browse our Online Platforms and to improve advertising. This also allows us to improve the Online Platforms and our Services. Third parties may also use such cookies and tracking technology if you interact with any content provided by them through our Online Platforms, however we endeavour to identify these cookies before they are used and allow you to accept or deny them.

Limited personal data may be collected through the cookies and tracking technology, including but not limited to transaction information and other generic information such as number of visitors, device information, etc. Further, if any personal data has been previously provided, cookies may be tied to such information.

Cookie and tracking information collected by us may be shared with third-parties which directly support our advertising/promotional activities and are involved in development/updatation of our Online Platforms.

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Commonly used browsers are set up to automatically accept cookies however you can modify your device's settings to either alert you when you receive cookies or block cookies. If you disable/block cookies, it may affect the performance and functionality of our Online Platforms and may also restrict your experience. If you use different devices to access our Online Platforms, you would be required to modify each device's settings individually to suit your cookie preferences.

HOW WE TREAT YOUR BROWSER INFORMATION

We analyse the log files of our Online Platforms to better understand the volume of traffic to particular areas of our Online Platforms. This information helps us to serve your information needs. Use of your information is done in the following manner:

a. **Information You Give to Us** is used –

- to verify and process your personal particulars and payment;
- to inform you of promotions, offers, surveys, events, products and services, which may be of interest to you;
- to facilitate and provide the services offered through the Online Platforms.
- to update and back-up our records;
- to carry out our obligations arising from any contracts entered into between the Company and you (including processing of any transactions executed or attempted to be executed by you) and to provide you with the information and Services, that you request from us;
- to enhance the security of our Online Platforms;
- to personalise content/Services offered to you;
- to facilitate sale of digital tokens or virtual currencies;
- to provide, manage or access digital wallets for holding digital assets;
- to provide services for purchasing, trading and/or holding of digital assets;
- to facilitate various products and/or services related to digital assets;
- to provide any escrow, courier, anti-counterfeiting or dispute resolution services;
- to remember information to help you efficiently access your Account;
- to provide you with information about other Services we offer that are similar to those that you are already using or have enquired about;
- to provide you, or permit Selected Third Parties to provide you, with information about Services we feel may interest you. If you are a registered User, we will only contact you by electronic means (e-mail or SMS) with information about services similar to the Services being used by you. If you are a new customer, and where we permit Selected Third Party to use your data, we (or they) may contact you for the purposes of verification and authentication of your identification documents;
- to notify you about changes to our Services;
- to ensure that Content from our Online Platforms is presented in the most effective manner for you and for your computing device;
- to send you Service-related notices or emails and other non-essential promotional material (Users will be provided the opportunity to opt-out of receiving such email communication by unsubscribing using the relevant link or by contacting us at service@primestack.io)
- for KYC verification of the details of Tax Identification Details and other Identification documents provided by you. You understand that in order to verify that such information belongs to you:
 - we may send you a verification emails/one-time password;
 - share all such information with a Selected Third Party.
- to prevent and identify suspicious /other illegal transactions in order to mitigate risks relating to money laundering and other illegal activities.

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- b. **Information We Collect About You** is used –
- to administer our Online Platforms and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Online Platforms to ensure that the content is presented in the most effective manner for you and for your device;
 - to allow you to participate in interactive features of our Services, if any, when you choose to do so;
 - as part of our efforts to keep our Online Platforms safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other Users about Services that may interest you or them.
 - for fulfilling our obligations under applicable law including performing on-going due diligence and reporting suspicious/other illegal transactions.
 - for mitigating risks relating to money laundering and other illegal activities.
 - in order to comply with directions of various law enforcement agencies/regulators.
- c. **Information We Receive from Other Sources** is used for – We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE AND DISTRIBUTION OF YOUR INFORMATION

We reserve the rights to distribute any information that you (i) voluntarily disclose to us or (ii) chose to make public to any third party. You acknowledge your personal data and other data may be exported outside of Singapore. Your personal data may be processed and stored in a foreign country or countries. Under those circumstances, the governments, courts, law enforcement, or regulatory agencies of that country or those countries may be able to obtain access to your personal data under relevant foreign laws. You acknowledge that the privacy standards of those countries may be lower than those followed in Singapore.

We further reserve the rights to distribute your personal data to any third party only under one of the following circumstances:

- a. **For Crime Prevention or Investigation** – We may share this information with the government/enforcement agencies or other companies assisting us, when we are:
- Obligated under the applicable laws or in good faith to respond to court orders and processes; or
 - Detecting and preventing against actual or potential occurrence of identity theft, fraud, money laundering, abuse of Services and other illegal acts;
 - Responding to claims that an advertisement, posting or other content violates the intellectual property rights of a third party
 - Under a duty to disclose or share your personal data in order to enforce or apply our Terms and other agreements; or to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with third parties for the purposes of fraud protection and KYC verification.
- b. **For Internal Use** – We may share this information:
- With any member of our Group. The term “Group” includes means, with respect to any person, any entity that is controlled by such person, or any entity that controls such person, or any entity that is under common

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control with such person, whether directly or indirectly, or, in the case of a natural person, any relative of such person.

In the event that we sell any business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets.

If the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

- c. **With Selected Third Parties** – We or our Group entities may disclose and share your personal data with selected business partners and third parties including but not limited to service providers who authenticate KYC and details as furnished/provided by the Users to the Company; Scheduled commercial bank(s) which provide(s) banking facilities to the Company; payment processing companies and other Digital Asset exchanges as the Company may require for providing the Services etc. (“Selected Third Party”).
- d. **With Advertisers and Advertising Networks** – We do not disclose sensitive personally identifiable information about our Users to any advertisers, but we may provide them with aggregate information about our Users (for example, we may inform them that any given number of women in a specified age group clicked on their advertisement on any given day) to select and serve relevant adverts to you. We may also use such aggregate information to help advertisers reach the kind of audience they want to target.
- e. **General Information of Public Interest** – The Company reserves the right to share current and historical bids, asks, and market prices; opening and closing range prices; high–low prices; trade prices; estimated and actual trade volumes; settlement prices; and, other aggregate data and information related to the Digital Assets traded on the Online Platforms.

TRANSFER OR SHARING OF PERSONAL DATA OUTSIDE OF SINGAPORE

We may need to transfer or share your personal data to third parties outside of Singapore, especially to our affiliates and subsidiaries in India, for various reasons including for regulatory compliance in Singapore and for our Indian users, to offer them a full suite of services in India in compliance with Indian laws. In circumstances where we may need to transfer or share your personal data to third parties outside of Singapore (including our affiliates and subsidiaries), we will ensure that such transfers are compliant with the requirements under the Personal Data Protection Act 2012 (“PDPA”). In this regard, we will take such necessary measures to ensure that such overseas recipients are bound by legally enforceable obligations (such as data transfer agreements or binding corporate rules where applicable) to ensure that these overseas recipients will provide a standard of protection to your personal data so transferred or shared that is at least comparable to the protection to your personal data under the PDPA.

ASSIGNMENT

You shall not assign or transfer any right or obligation that has accrued to you under this Privacy Policy and any attempt by you to assign or transfer such rights and obligations, shall be null and void.

We may assign, novate, or transfer any or all rights and obligations that accrued in our favour under the Privacy Policy, at our sole discretion, to our subsidiaries, affiliated entities, or any other third party, especially in order to comply with regulatory requirements in Singapore, and for our Indian users, to offer them a full suite of services in India through our Indian subsidiaries or affiliates.

DATA SECURITY PRECAUTIONS

Personal data means data, whether true or not, about an individual who can be identified (i) from that data, or (ii) from that data and other information to which the organisation has or is likely to have access. Your personal data is accessible only by our authorized employees and Selected Third Parties, and is otherwise kept secure.

We have in place appropriate technical and security measures to prevent unlawful access to or accidental loss of information collected including those prescribed under applicable laws. All information you provide to us is stored on our secure servers. We use firewalls on our servers. Any information collected during processing of payment transactions electronically will be encrypted using Secure Socket Layer (SSL) technology. Where we have given you (or where you have chosen) a username and password which enables you to access certain parts of our Online Platforms, you are responsible for keeping these details confidential. We ask you not to share your password with anyone. You must log out when you leave any section of our Online Platforms protected by a password. We recommend closing the browser completely and re-opening it before accessing other websites over the internet.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee, give no warranties, and shall not be liable for breach of the security of your data transmitted through the Online Platforms due to malicious attacks, errors, commission or omissions not wilfully initiated by us. Any transmission is at your own risk. Once we have received your information, we will use strict physical, electronic, and procedural safeguards to try to prevent unauthorised access.

DATA RETENTION

We may, at our sole discretion, retain any information and/or data provided by you for as long as your Account is active, for resolution of disputes, for the purpose of investigations or ongoing prosecutions or in case of any suspicious/illegal transactions, for enforcement of any agreements, and/or as necessitated under applicable laws. The retention period may be extended in accordance with the applicable law.

We make no warranties and shall not be liable regarding non-availability or non-retention of any information and/or data provided by you beyond the deletion of your Account.

YOUR RIGHTS

You may deal with your personal data available with us in the following ways: You may correct, amend, add or update personal data from your Account at any time by logging in to your Account.

You are free to remove or delete your content from your Account at any point in time, provided, however, the Company may retain all or some of your data in accordance with the AML Policy in force or as per Applicable Law. Copies of public content may be retained indefinitely in our systems, including in cached and archived pages of our Online Platforms, or if other Users have copied or saved that information.

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PRIVACY CONTACT INFORMATION

If you have any queries, concerns, or comments with regards to anything contained in our Privacy Policy, you may contact us by sending an email to service@primestack.io

ONLINE PLATFORMS' SECURITY

The Online Platforms store all data with the Cloud Platform provided by Amazon Web Services (AWS) which may store this data on its servers located outside of Singapore. AWS has security measures in place to protect the loss, misuse and alteration of the information. These measures adopted by the AWS Cloud Service and certain additional measures adopted by us are detailed in the [Manual of Data Security Practices and Procedures](#). You acknowledge you have reviewed and understood the Manual of Data Security Practices and Procedures and that these are reasonable security practices and procedures that are commensurate with the information assets being protected. You also acknowledge that the standards followed by AWS are not within control of the Company and are liable to change from time to time. You agree that it is in your interest to review from time to time the security standards, practices and policies adopted by AWS to confirm that there are no changes that you are not comfortable with, AWS can be contacted [here](#).

COMPLIANCE OFFICER

If you: (i) have queries about our data protection processes and practices, (ii) wish to request access to and/or make corrections to your personal data in our possession or under our control, or (iii) wish to withdraw your consent to our collection, use or disclosure of your personal data, please submit a written request (with supporting documents, (if any) to our Compliance Officer. The name and contact details of the Compliance Officer are provided below:

Compliance Officer [PRIMESTACK PTE. LTD.]

105 Cecil Street, #07-02, The Octagon, Singapore 069534

Email: legal@coindcx.com | service@primestack.io

Our Compliance Officer shall endeavour to respond to you within 30 days of your submission. Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. Our legal rights and remedies are expressly reserved in such event.

We may charge you a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you.

GOVERNING LAW AND JURISDICTION

This Privacy Policy and your use of the Online Platforms shall be governed and construed in accordance with the laws of Singapore. You agree to submit to the exclusive jurisdiction of the Singapore courts.

AMENDMENTS AND UPDATES TO PRIVACY POLICY

We reserve the right to amend this Privacy Policy from time to time to ensure that this Privacy Policy is consistent with any developments to the way CoinDCX uses your personal data or any changes to the laws and regulations applicable to CoinDCX. We will make available the updated Privacy Policy on the Online Platforms. You are encouraged to visit the Online Platforms from time to time to ensure that you are well informed of our latest policies in relation to personal data protection. All communications, transactions and dealings with us shall be subject to the latest version of this Privacy Policy in force at the time.

This Privacy Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us. We may revise this Privacy Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Privacy Policy was last updated.

ACCEPTANCE OF PRIVACY POLICY

By using the Online Platforms and/or any services provided by CoinDCX, you signify your acceptance of this Privacy Policy and terms of service. If you do not agree to this Privacy Policy or terms of service, please do not use the Online Platforms or any services provided by CoinDCX. Your continued use of the Online Platforms following the posting of changes to this Privacy Policy will be deemed your acceptance of those changes.

CONTACT US

If you have any questions on this Privacy Policy, please contact the team at service@primestack.io

DECLARATION

[When collecting personal information from users of the website, the below should show up and require users to acknowledge via checkboxes]

ACKNOWLEDGEMENT AND CONSENT

- I acknowledge that I have read and understood the above Privacy Policy, and consent to the collection, use and disclosure of my personal data by Primestack Pte. Ltd. for the purposes set out in the Privacy Policy, in particular the usage of cookies and related technologies as well as disclosure and sharing of personal data with third party providers.

Please tick the relevant boxes below if you agree to receive the following marketing materials:

- I do not wish to receive any marketing information.
- I would like to receive information about the goods and services which may be provided by Primestack Pte. Ltd., including but not limited to offers, promotions and information about new goods and services, via the following channels:
 - newsletter
 - email
 - text message
 - telephone call

DOCUMENT DETAILS

Document Type	Policy Document
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Adoption Date	27 July 2020
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Document Controller	Legal & Compliance
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