

Estate Protocol

PRIVACY & COOKIES POLICY

Thank you for visiting our website. We at Estate Protocol (referred to as "we," "us," and "Company" in this policy) respect your concerns about privacy. This privacy policy ("Privacy Policy") has been developed to better serve those who are concerned with how their "Personally identifiable information (PII)" is being used online by us and explains our practices for information collected via the website, how such information is used, the circumstances under which we disclose such information to third parties, and the choices you can make about the way we use and share such information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. We will process your personal information at all times in accordance with applicable privacy and U.S. data protection laws. The purpose of this Privacy Policy is to provide transparency around how we collect information on this website. Please take the time to read and understand this Privacy Policy so you can understand how we use your personal information.

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

1. OUR COMMITMENT

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

2. CHILDREN'S PRIVACY

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

3. WHOSE PERSONAL AND OTHER INFORMATION DO WE COLLECT?

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

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

4. INFORMATION WE COLLECT ON THIS WEBSITE

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

- Name, Contact Number, residential, business, and postal addresses, E-mail Address, IP Address;
- Computer or mobile device information;
- Profile information such as username and password;
- Demographic details such as date of birth, country of citizenship and/or country of residence, marital status;
- Information about your net worth and/or income such as your stated net worth; stated current, historical, and expected future income; source(s) of income; and supporting documentation that you choose to submit (e.g., tax forms, tax returns, pay stubs, financial account statements, and information about your financial assets and liabilities);
- Government-issued identification (to the extent permitted under applicable law) such as a national identification number (e.g., a Social Security Number, tax identification number, or passport number), state or local identification number (e.g., a Driver's License or other government-issued identification number), a copy of your government-issued identification card, and related government issued photographs;
- Information about your investment experience and preferences such as investment objectives, investment experience, liquidity needs, and risk tolerance;
- Financial Account and payment Information such as your bank accounts you may use to source your investment funds, other related payment information, and the cryptocurrency wallet addresses you may use to receive your tokens and revenue payout, if any;
- Information about your relationship to a company such as your current occupation, job title, and whether you are a beneficial owner or authorised signatory of the legal entity using the Service;

- Feedback and correspondence such as information you provide when you request information from us, receive customer support, or otherwise correspond with us including by interacting with our pages on social networking online sites or services;
- Marketing information such as your preferences for receiving marketing communications and details about how you engage with our marketing communications;
- Transaction Information: Information about the transactions you make on our Services such as the name of the recipient, your name, the amount, and/or timestamp.
- Employment Information: Office location, job title, and/or description of role.
- Social media information such as username or handle preferences; and
- Other personal information in content/message you provide to us such as through emails you send us.

A. Information that you voluntarily provide to us:

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

B. Information collected automatically:

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

C. Information collected from third parties:

- We may also collect Personal Data from third-party partners and public sources as required or permitted by applicable law, such as public databases, credit bureaus, and ID verification partners for KYC which include: Financial information, Reputational information, Corporate/business activities for corporate customers.
- We use ID verification partners for KYC. Our ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job position, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws. In some cases, we may process additional data about you to ensure our Services are not used fraudulently or for other illicit activities. In such instances, processing is necessary for us to continue to perform our contract with you and others.

- **AML/KYC and Crime Prevention:** For the prevention, detection, investigation, and prosecution of crime (including without limitation money laundering, terrorism, fraud, and other financial crime) in any jurisdiction, identity verification, government sanctions screening, and due diligence checks.

- **Legal and Regulatory Compliance:**
 - To comply with local or foreign law regulations, voluntary codes, directives, judgments or court orders, agreements between any member of the FAB group and any authority regulator or enforcement agency, policies, reporting requirements under financial transaction legislation, and demands or requests of any authority regulator, enforcement agency, or exchange body.
 - To seek professional advice including in connection with any legal proceedings (including any prospective legal proceedings), for obtaining legal advice or establishing, exercising, or defending legal rights.

5. HOW WE USE THIS INFORMATION

We may use the information described above to:

- Send you quotes, promotional materials, newsletters, and other communications;
- Serve you relevant offers and ads;
- Respond to your inquiries;
- Perform data analyses;
- Identify and verify customers using our Services in order to comply with anti-money laundering and terrorist financing laws across jurisdictions;
- Verify customer's identity by comparing the personal information provided against third-party databases and public records;
- Operate, evaluate, and improve our business;
- Resolve any question, dispute, collected fees, or to troubleshoot problems;
- Protect against, identify, and prevent fraud, copyright infringement, and other criminal activity;
- Enhance security, monitor, and verify identity or service access, combat spam or other malware or security risks, and to comply with applicable security laws and regulations; and
- Comply with and enforce applicable legal requirements, relevant industry standards, and our policies including our Terms & Conditions.

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

6. ADVERTISING

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

7. WHAT ARE COOKIES?

- Cookies are small text files sent to your browser and stored by your browser on your computer or other device by the websites that you visit or by certain emails that you open. Cookies allow our websites to "remember you" when you return and allow us to deliver relevant page to you on our websites.

Cookies help us in many ways to make your visit to our websites more enjoyable and meaningful to you. They also allow us to tailor our websites to better match your interests and preferences.

8. HOW DO WE USE COOKIES?

- We may use information collected from our cookies to identify user behaviour and to serve content and offers based on your profile and for the other purposes described below. Some of the cookies we use don't collect information that identifies a visitor. For example –
 - Performance cookies (see below)
 - Targeting cookies
 - Functionality cookies
 - Third-party cookies
- In other cases, we can associate cookie information (including information from cookies placed via our advertisements on third-party sites) with an identifiable individual. For example, if we send you a targeted email which includes web beacons, cookies, or similar technologies, we will know whether you open, read, or delete the message. When you click a link in a marketing email you receive from us, we will also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered or logged into our site.
- We may combine and compile personal information and information collected through cookies to create a profile of your preferences and interests. We may use your profile to display content, programs, and services that may be of interest to you.

9. TYPES OF COOKIES WE USE

- We use cookies that are required for the operation of our website to enhance the functionality of the website by storing your preferences, enabling social interactions, ensuring our services are working properly, and to customise content and ads provided to you based on your browsing activities. These cookies help us understand how our website is used and to help us improve your overall online experience.
- Some of the cookies we use may capture personal data about you. For example, cookies can capture your login ID, password, and browsing history if you set your browser to accept such cookies. In this instance, we will also use the captured personal information to create a profile for you.

Types of cookies we use are:

- **Essential Cookies:** These cookies are necessary to provide you with some of the features of our website, such as remembering your login details or the goods you placed in your shopping basket.

- Analytical/performance cookies: These cookies allow us to collect information about how visitors use our website. These cookies don't collect information that identifies a visitor. They help us understand which pages are the most popular and help improve how our websites work.
- Functionality cookies: These cookies allow our website to remember choices you make (such as your language or the region you are in) and provide more enhanced features. For instance, a website may be able to provide you with local weather reports or traffic news by storing information about your current region. These cookies can also be used to remember changes you have made to text size, fonts, and other parts of web pages that you can customise. They may also be used to provide services you have asked for, such as watching a video or commenting on a blog.
- Advertising cookies: These cookies collect information about your browsing habits in order to make advertising relevant to you and your interests. They are usually placed by advertising networks with our permission. These cookies remember that you have visited a website and this information is shared with other organisations such as advertisers.

10. HOW LONG DO WE RETAIN YOUR PERSONAL DATA?

- We retain your personal data only for as long as is necessary for the purposes set out in this Policy. Different retention periods apply for different types of data. For instance:
 - Financial information will be retained as long as necessary for tax purposes.
 - Identifying information will be retained as long as necessary for fraud prevention.
 - General marketing information will be retained until you unsubscribe from marketing communications.

11. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

- We may disclose your personal information to the following entities:
 - Service providers: We use other companies, agents, or contractors ("Service Providers") to perform services on our behalf or to assist us with the provision of services to you. For example, we engage Service Providers to provide marketing, advertising, communications, infrastructure, and IT services, to personalise and optimise our services, to provide customer service, to analyse and enhance data, including customers' interaction with our services, and to process and administer consumer surveys. In the course of providing such services, these Service Providers may have access to your personal or other

information. We do not authorise them to use or disclose your personal information except in connection with providing their services.

- **Third Parties:** We may share information with third parties such as advisors, advertising and marketing partners, external auditors, legal representatives, and business partners when we have your permission or when otherwise authorised or required by law. The website contains links to other websites. We are not responsible for the privacy policies or practices of third party websites.
- **Other instances:** We may share your information with other parties in connection with corporate transactions, such as during mergers, acquisitions, bankruptcy, dissolution, or similar events. We may also share information to enforce our Terms & Conditions, protect the security and integrity of our website, to investigate and defend against any claims or allegations, or to assist government enforcement agencies.
- **Use of Personal Data for Marketing:** To provide you or permit selected third parties to provide you with information about goods or services we feel may interest you. Except where you have opted out we may also use your personal data to keep you informed about relevant products and services.
- **Market Research and Surveys:** Conducting market research and surveys with the aim of improving our products and services.

12. YOUR DATA RIGHTS

Under DIFC Data Protection Law you have a number of rights in respect of your information which include the right to:

- access your information;
- withdraw your consent to the processing of your information at any time;
- ask us to make changes to the information we hold about you to make sure that it is accurate and up to date;
- delete or erase your information (sometimes called the right to be forgotten);
- stop or restrict our processing of your information;
- object to our processing your information;
- not be subject to automated decision-making; and
- request the transfer of some of the information we hold about you (known as data portability).

If you would like to exercise any of your rights please contact us at team@estateprotocol.com . Please note that an archive copy of any information provided to us may be retained by us for our records and for audit purposes.

If you wish to exercise any of these rights, please contact us using the contact details provided below.

- **Retention of Data**
 - Information relating to your financial transactions with us will be kept for the period required by relevant UK tax and revenue legislation.
 - Your personal profile and membership data will be retained whilst you continue to be an active free or paid member and for up to 7 years following cessation of membership activity.

- **How Do You Withdraw Your Consent, Including Marketing Opt-Out?** You may withdraw your consent for data processing or opt out of marketing communications at any time by contacting us at [contact email]. Unsubscribe links are also provided in our emails.

- **Do We Carry Out Profiling and Automated Decision Making?** We use analytics tools to collect anonymous website usage data for improving our services but do not engage in profiling or automated decision-making beyond this scope.

13. SECURITY (DATA SECURITY & TRANSMISSION)

- We implement and maintain reasonable security measures to protect your personal data against unauthorised access, disclosure, alteration, and destruction. We use encryption, access controls, and other security protocols to ensure the confidentiality and integrity of your personal data.
- The Internet is not a secure form of communication and sending and receiving information over the Internet carries risks including the risk of access and interference by unauthorised third parties. Information passing over the Internet may be transmitted internationally (even when the sender and recipient are located in the same country) via countries with weaker privacy and data protection laws than your country of residence. We do not accept responsibility or liability for the confidentiality, security, or integrity of your personal information in connection with its transmission over the Internet.
- To help protect your personal data and minimise the risk of it being intercepted by unauthorised third parties, our secure servers use industry standard Secure Socket Layer (SSL) and Transport Layer Security (TLS) technology when you submit information to us through our website.

Personal and Sensitive User Data

Our mobile application available on the Google Play Store and Apple Store collects certain personal data from users. This data is necessary for Stake to operate its business and serve our customers. Below we outline the types of data we collect and their uses:

- Images (Photo Roll and Camera):
 - Purpose: To capture passport and "selfie" images as required by our financial regulators (DFSA and CMA) as part of our KYC (Know your Customer) process.
 - Service Provider: IDWise.
- Device Information:
 - Data Collected: Device ID and model.
 - Purpose: To personalise the user experience and send push notifications.
 - Service Provider: Customer.io.
- Payment Data:
 - Purpose: To process payments.
 - Service Provider: Checkout.com.
 - Note: Stake does not store any card information.
- Analytics:
 - Data Collected: Analytics data such as events.
 - Purpose: To enhance product development and marketing activities.
 - Service Provider: Segment.
 - All data is shared with providers using HTTPS a secure protocol.

14. INTERNATIONAL DATA TRANSFERS

- Information that Estate Protocol collects may be stored and processed in and transferred between any of the countries in which we operate to enable us to use the information in accordance with this privacy policy.
- Information, which you provide, may be transferred to countries including the United States, which do not have data protection laws equivalent to those in force in the European Economic Area. However any transfers of personal data will be done in compliance with applicable DIFC Data Protection laws.
- In addition personal information that you submit for publication on the website will be published on the internet and may be available via the internet around the world. We cannot prevent the use or misuse of such information by others.
- You expressly agree to such transfers of personal information.

15. Social Media

- Estate Protocol operates channels, pages, and accounts on some social media sites to inform, assist, and engage with customers. We monitor and record comments and posts made on these channels about Estate Protocol so that we can improve our services.
- Estate Protocol is not responsible for any information posted on those sites other than information we have posted ourselves. We do not endorse the social media sites themselves or any information posted on them by third parties.

16. Monitoring:

- To the extent permitted by law, Estate Protocol may record and monitor your communications with us to ensure compliance with our legal and regulatory obligations and our internal policies. This may include the recording of telephone conversations.

17. CHANGES TO THIS PRIVACY POLICY

- We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will post the updated Privacy Policy on our website and indicate the date of the last update. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your personal data.

18. CONTACT US

- If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at:

CONTACT US [FOR NOTICE AND OTHER COMMUNICATIONS]

ESTATE PROTOCOL

1201 Orange Street, Suite 600, City of Wilmington, County of New Castle,
Delaware, USA

Support Email: team@estateprotocol.com