

## **Personal Data Privacy and cookies Policy**

### **PREFACE**

Understanding the importance of privacy and inviolability of personal data, as well as of the content posted by the Users on our website, we bring into action this Privacy Policy to determine the procedure for conducting transactions with confidential data of the Parties when using the website and some services of the Decimal ecosystem.

This document contains the rules for the use of your personal data, your rights and obligations, as well as the rights and obligations of our company in relation to your personal data in cases where access to the services of the Decimal ecosystem involves the provision of personal data by you

This privacy policy (hereinafter - the Policy) applies to all information, including personal data in the understanding of the applicable law (hereinafter - the "Personal Information"), which DECIMAL PTE. LTD. and / or our affiliates, including those belonging to the same group as We can receive about you in the process of using any sites, programs, products and / or our services of the ecosystem Decimal Ecosystem Decimal(hereinafter referred to as the "Services"), information about which you can find on the website <https://decimalchain.sg/> and other sites we own (yes together - the "Sites"), as well as during the execution by us / our affiliates of any agreements and contracts concluded with you in connection with your use of the Services. We may also receive Personal Information from our partners (hereinafter referred to as the "Partners"), the sites, programs, products or services of which you use in such cases, the transfer of Personal Information is possible only in cases established by applicable law, and is carried out on the basis of special agreements between us and each of the Partners

This Privacy Policy (hereinafter - the Privacy Policy) applies to all information that DECIMAL PTE. LTD. located on the domain <https://decimalchain.sg/> can receive about the User while using the site and services of the ecosystem Decimal on the site <https://decimalchain.sg> and in another accessible way .

In cases where you provide personal data when using the services of the Decimal ecosystem this Privacy Policy applies, regardless of how you use them, including on mobile devices.

We reserve the right to introduce changes to the Privacy Policy at any time by posting a modified version on this website and indicating the effective date of such modifications. Should there be any significant changes to this document, we will notify you by e-mail (using the e-mail address specified at the time of registration).

Please read this document carefully. The use of our platform services in the manner indicated below is mandatory.

The Policy was last revised and published on <https://decimalchain.sg/>

For more information about PDPA generally, please visit the Personal Data Protection Commission's website at <http://www.pdpc.gov.sg>

## 1. TERMS AND DEFINITIONS

In this document, unless otherwise stated directly in the body text, the following words and expressions shall have the meanings as described below:

**“Personal Data”, “Personal Information” or “Your Data”** refer to any information relating directly or indirectly to the individual in question (personal data owner).

**"Decimal Ecosystem", "Decimal Ecosystem Services" "Decimal Software" "Decimal Blockchain"** means the websites, applications, services or tools operated by DECIMAL PTE. LTD. “Ecosystem” “Services”, “We” and “Us” refer to DECIMAL PTE. LTD.

**Service** means any service, feature or function offered within the Decimal Ecosystem.

**The Decimal ecosystem site** is a site hosted on the Internet at <https://decimalchain.sg> where the ecosystem and software interface is hosted or available.

**The Decimal ecosystem** is a complex interconnected system (set) of services that can be accessed through the use of Decimal software (blockchain).

**The Decimal blockchain** is a continuous sequential chain of blocks (linked list, database) built according to certain rules, containing information about a certain asset (resource).

**Software (program, blockchain) Decimal** - software based on distributed ledger technology (computer program), including algorithms for accounting for assets (resources), as well as algorithms for delegation (transfer) of cryptocurrency in order to generate cryptocurrency and receive rewards in the form of cryptocurrency.

The software (also - the Program) Decimal exists in the form of a website, an application, and add-ons to applications (messengers).

A detailed description of the software is given on the official Decimal website. Intellectual property rights for the software, application and its elements belong to DECIMAL PTE. LTD.

**Use of the Program** - any actions related to the functioning of the Program in accordance with its purpose.

**Digital assets** is a digital representation of values, which means "cryptocurrency", "virtual currency", "digital currency", for example, bitcoin, which is based on the cryptographic protocol of a computer network, can be centralized or decentralized, with closed or open source code and used as a means of exchange and / or storage of values.

**Personal Data Processing** refers to an action (operation) or a set of actions (operations) performed with personal data using automatic means or independently, including collection, recording, systematization, collection, storage, refinement (update, change), extraction, use, transfer (dissemination, submittal, access), anonymization, blocking, deletion and destruction of personal data.

**Personal Data Privacy** is a mandatory requirement for the Controller or another person who has obtained access to personal data to prevent its dissemination without the consent of the personal data owner or any other legal basis.

**“Website User”, “Platform User”, “User”, “Client”** – a person who has access to the Website and platform services via the Internet.

**Cookie** is a small piece of data sent by a web server and stored on the user's computer. It is sent to the user's web server by a web client or a web browser in an HTTPS request while the user is browsing.

**IP address** is a unique network address of a node on an IP computer network.

**Decimal cryptocurrency wallet** means the User's account on the Decimal blockchain network, accessible through the Decimal ecosystem, which is only accessible to the Ecosystem User who has a

private key and is an element of the program (Decimal blockchain), the interface of which is posted and available on the Ecosystem Website. An electronic (cryptocurrency) wallet (account) is a tool for interacting with the blockchain network

**Website Administration** – authorized employees responsible for the website management.

## 2. GENERAL PROVISIONS

2.1. Acceptance of this Privacy Policy and the terms of processing the User's personal data prior to using the website is mandatory in cases where the User provides personal data to use the services.

2.2. In case of disagreement with the terms and conditions of the Privacy Policy, the User shall stop using the website.

2.3. This Privacy Policy applies only to the <https://decimalchain.sg> website, which does not control and is not responsible for any third-party websites, accessible to the User through the links on <https://decimalchain.sg>.

## 3. MEASURES TO PROTECT PERSONAL DATA

3.1. In cases of receiving your personal data we use encryption to protect the information you provide and store the decryption keys in separate systems. The data controller processes and stores your personal information on our server – inside the data center.

3.2. In cases stipulated by law, we shall appoint employees to protect your personal data, who will be responsible for observing the Privacy Policy.

3.3. We exert every effort to protect your personal data from unauthorized access or disclosure and prevent the collected and stored information from destruction.

3.4. The list of measures we take:

- data encryption using SSL;
- two-factor authentication;
- analyzing the methods of gathering, storing and processing information.

We conduct training for our employees teaching them to work with personal data.

We strive to ensure full compliance of our personal data processing and storage methods with the legislation in force.

Unfortunately, despite our security measures, data transfer through the Internet is not completely secure. We do our best for your personal data protection, but we cannot guarantee the security of your personal data during transfer. In this regard, all actions concerning your personal data transfer are performed at your own risk.

**If you have any questions regarding your personal data protection, feel free to email us at [info@decimalchain.sg](mailto:info@decimalchain.sg)**

## 4. SUBJECT MATTER

4.1. This Privacy Policy establishes the obligations of the Website Administration for non-disclosure and protection of the User's personal data provided at the request of the Website Administration during registration in cases where such registration is required.

Personal data provided at the time of registration may be saved, even if you have not completed the registration process.

**If you are located within the European Economic Area, in Russia and some other countries, this information will not be saved without your consent.**

By providing us personal data of any person (except yourself) while using our platform, you guarantee that you have received consent from such person to disclose his / her personal data to us, as well as his / her consent to processing, use and disclosure of such personal data for the purposes and in the manner described in this Privacy Policy.

## **4.2. Information we collect:**

### **4.2.1. Information you provide:**

We reserve the right to collect and make use of the following data about the platform users in cases where the User provides personal data to use the services.:

- full name;
- home address, including country of residence;
- email address;
- mobile phone number;
- date of birth;
- proof of identity (for example, driver's license, passport or identity card issued by a government agency);
- social security number or its equivalent issued by a government agency;
- other personal or commercial and / or identification information which, in our sole discretion, is necessary for us to fulfill our legal obligations to comply with anti-money laundering legislation (AML / CFT), for instance, in accordance with the European Union's Anti-Money Laundering Directive, etc.

### **4.2.2 Information we automatically collect about you.**

- Information about your location.
- Information automatically collected through providers of analytical systems to determine your location, including your IP address and / or domain name, as well as any external authentication page, your login data, browser type and version, time zone setting, types and versions of browser plug-ins, operating system and platform;
  - Log data – information generated when our platform services are used, automatically collected and stored in our server logs. This may include, among other things, information about a specific device, location, system activity, as well as any internal and external information associated with the web pages you visit (full / single URL address) using our website or application (including date and time, page response time, loading errors, duration of visits to certain pages, page interaction information (such as scrolling, clicks, etc.), as well as ways to switch between open pages;
  - account information;
  - Correspondence – information that you provide to us in writing or in speech, when opening a account, in customer support service, including phone numbers used to contact us.

### **4.2.3. Information about you received from other sources.**

We may receive information about you, if you use any other website that we use or any other services that we provide.

We may receive information about you from third parties, including:

- banks you use to transfer money to us provide us with your personally identifiable information, such as your name and address, as well as your financial information, for instance your bank account details;
- business partners who can provide us with your name and address and any other data, including financial information;
- ad networks, search engines that can provide us with anonymous or withdrawn information about you, for instance confirm the way you found our site;
- etc.

## 5. PURPOSE OF COLLECTING THE USER'S PERSONAL DATA

### 5.1. General provisions:

- whereas we are **legitimately interested** in further implementation of innovations and improvement of the platform services;

- whereas it is important to process your personal data in order to **fulfill our obligation**, where necessary (provided that you are or will be a party committed to its fulfillment);

- whereas we have **legal obligations** to comply with while processing your personal data in accordance with the requirements of the legislation in force,

We use various ways of processing your personal data depending on the corresponding legal grounds.

### 5.2. The Website Administration reserves the right to use the User's Personal Data in order to:

- identify the User registered on the Website;

- provide the User with access to personalized resources of the Website;

- establish feedback with the User, including sending notifications, inquiries regarding the use of the Website, the provision of services, processing the User's requests and applications;

- determine the User's location to ensure security and prevent fraud;

- confirm the adequacy and completeness of personal data provided by the User;

- ensure effective customer and technical support of the User in case of problems related to the use of the Website;

- notify the User with his / her consent of special offers, information about new services, newsletters and other information on behalf of the Website or the Website's partners.

### 5.3. Deciding upon processing your personal data, we analyze all risks of using it in order to respect your rights and legitimate interests.

### 5.4. We have more than one legal basis to process your personal data depending on the specific purpose of using it, including:

- in order to effectively fulfill our contractual obligations, provide you with quality service, as well as comply with the applicable rules of the legislation in force, **we process the information you provide**.

- in order to comply with legal and / or regulatory requirements, including, but not limited to, anti-money laundering requirements, taking into account our legitimate interests and legal obligations, as well as the need to fulfill the obligations you are committed to as a party, we process **the information you provide, information about your devices and information about third parties**.

- in order to implement measures to fight against fraud, prove identity for protection against fraud, comply with current legislation, as well as confirm the right to use our products and services and ensure the security of our services, we process **the information you provide, information about your devices and information about third parties**.

- in order to notify you of new platform features, functions or services, give recommendations for you and other users, process applications for platform services, taking into account our legitimate interests, we process **the information you provide, information about your devices and information about third parties**.

- in order to ensure proper operation of the platform, manage the internal operations necessary for its smooth running, including troubleshooting, data analysis, tests, studies (for statistical and investigation purposes), timely notify you of any changes in our service, our terms and conditions,

as part of our efforts to ensure the platform security, we process the **information you provide and information about your devices**.

**If you have any questions related to specific legal grounds for processing your personal data, please contact us at [info@decimalchain.sg](mailto:info@decimalchain.sg).**

## **6. PERSONAL DATA PROCESSING METHODS AND DEADLINES**

### **6.1. General provisions**

The User's personal data are processed for an indefinite period of time, in any legal way, including in personal data information systems, using automatic means or independently.

In case of loss or disclosure of personal data, the Website Administration shall notify the User of the fact.

### **6.2. Disclosure of personal data**

The Administrator undertakes not to disclose the User's personal data to third parties for commercial purposes without the User's consent, except as provided in this Privacy Policy, as well as in cases stipulated by law, namely:

**6.2.1.** We are entitled to disclose your personal data to the following third parties:

- affiliates, business partners, parties to contracts for the purposes of execution of any contract concluded with them or with you;
- analysts and search engine specialists who help improve and optimize our Website;

**6.2.2.** We may disclose your personal data to third parties if:

- we sell or buy any business or assets, in which case we are entitled to disclose your personal data to a prospective seller or buyer in order to continue providing services.

**6.2.3.** We shall disclose your personal data to comply with any legal obligations, ensure compliance with / use of our internal documents (including the Platform Terms of Use, etc.) and other applicable agreements; or to protect the rights, property and ensure the security of the platform, our customers and other persons. Exchange of information with other companies and organizations is necessary for protection against fraud and compliance with other requirements established by applicable law.

**6.3.** If it seems reasonable, we conduct and assist in criminal investigations. Amongst other things, we attempt to:

- prevent and detect fraud and other criminal activities;
- comply with the requirements of public authorities;
- protect the platform from financial and insurance risks;

**6.4.** We cannot publish an exhaustive list of all third parties we share your personal data with, since it depends on how you use our services.

**To get additional information about third parties we share your personal data with (a list of persons you are interested in), please send us a request to [info@decimalchain.sg](mailto:info@decimalchain.sg)**

## **7. DATA EXCHANGE OUTSIDE THE EUROPEAN ECONOMIC AREA**

In some cases (including in order to meet your needs), we need to disclose your personal data to third parties outside the European Economic Area.

In these cases, we guarantee that we, as well as our partners take the necessary security measures to protect your data.

**By using our platform, you consent to the transfer of your personal data to foreign countries, including countries that have different data protection rules, unlike those established in your country.** During these transfers, your personal data will be protected as described in this Privacy Policy.

**For more information, contact us at [info@decimalchain.sg](mailto:info@decimalchain.sg).**

## **8. PROFILING AND AUTOMATED DECISION MAKING**

**8.1.** In some cases, including in order to meet your needs, we may use your personal data, for instance, your country of residence and history of transactions. For example, if you often trade in a certain virtual currency, we may use this information to inform you about new platform updates. When we do this, we take all the necessary measures to ensure the protection of your privacy and security. Additionally, we only use anonymous or de-identified data.

We are entitled to use automated decision making (ADM) to improve your experience or help fight financial crime. For instance, to guarantee you a fast and efficient service, we use ADM to verify your identity documents or to confirm the accuracy of the provided data.

## **9. DATA PRIVACY WHEN USING DIGITAL ASSETS AND BLOCKCHAIN**

**9.1.** Your use digital assets may be “recorded” in blockchain. The use of blockchains may lead to inadvertent disclosure of personal data.

Considering the decentralized nature of a blockchain, participation of third-party networks that are not controlled by our platform in a blockchain, we cannot delete, modify or change your personal data in such networks.

## **10. PERSONAL DATA STORAGE**

**10.1.** General provisions.

Our transactions are supported by a network of computers, servers, other infrastructures and information technologies, including, but not limited to third-party service providers. We and our third-party service providers store and process your personal data in Singapore.

**10.2.** Since the platform complies with the legislation in force, including with AML requirements, we are required by law to store some of your personal and transactional data to be used only when absolutely necessary. We will delete all data that we no longer require under the legislation in force.

## **11. USING COOKIES AND SIMILAR TECHNOLOGIES**

When you browse through our website and use the platform services, we may use Cookies on your computer or other devices used to visit our website.

We use Cookies to help us recognize you as a customer, collect information about your use of our services, configure our services and select content to meet your needs, as well as collect information about your computer or other access devices to ensure that our AML obligations are met and that your account security is not compromised by detecting irregular or suspicious account activities.

We use both "session" and "persistent" Cookies. Session Cookies expire once you log out of your account or close your browser. Persistent Cookies remain on your computer or mobile device until deleted. Most web browsers are set to accept Cookies by default.

## **12. OBLIGATIONS OF THE PARTIES**

### **12.1. The User shall:**

12.1.1. provide accurate personal data necessary to use the Website and the platform services;

12.1.2. update and supplement the personal data provided, in case of any changes.

### **12.2. The Website Administration shall:**

12.2.1. use the information obtained solely for the purposes specified in this Privacy Policy;

12.2.2. ensure secure storage of the information, not disclose it without the prior written consent of the User; the Website Administration shall not sell, exchange, publish, or disclose the obtained personal data of the User by any means, except as provided in this Privacy Policy;

12.2.3. take precautions to protect the privacy of the User's personal data in accordance with the established business practices for protecting this type of information;

12.2.4. block personal data of the corresponding User at the request made by the User, his / her legal representative or the competent authority for the protection of the rights of personal data owners for the period of verification, in case of discovery of unreliable personal data or illegal actions.

## **13. USER RIGHTS**

13.1 In accordance with applicable laws and regulations, we may occasionally send you information on our products, additional services or upcoming events using the information we have obtained from you. When you create a Decimal account, you sign up for our newsletter. You can refuse to receive messages from us (including newsletter). We will never disclose your personal information to third parties for direct marketing or other unrelated purposes without your prior written consent. You cannot refuse to receive the letters we send for certain legal or administrative purposes.

### **13.2. Cookies.**

You may choose to disable session cookies, if your browser has such option, but deleting or disabling our cookies may interfere with your user experience, as well as with the platform features.

### **13.3. Right to correction.**

You are entitled to correct any personal data.

### **13.4. Right to deletion (oblivion).**

You have the right to ask us to delete your data, if it is no longer needed for the purposes of fulfilling our obligations, as well as compliance with the legislation in force.

13.5. You may have the right to transfer certain personal data with participation of personal data operators, for instance, in order to transfer your account information from one online platform to another.

### **13.6. Location tracking.**

You may disable location tracking using your device settings or follow the standard procedure for removal of our applications from your device; however, since we use such data to meet certain legal requirements, as well as for continuous fraud and risk monitoring, choosing to delete or disable location tracking services may interfere with your user experience and our platform services.

13.7. At any time, you can withdraw your consent to the processing of personal data by sending us an application to withdraw consent to the processing of personal data.

## **14. WEBSITE ADMINISTRATION EXEMPTION FROM LIABILITY**

In case of loss or disclosure of the Private Data, the Website Administration shall not be held liable, if such Private Data:

- had been publicly available prior to its loss or disclosure;
- had been received from a third party before it was received by the Website Administration;
- has been disclosed with the consent of the User.

## **15. ACCESS TO DATA**

In accordance with the legislation in force, you are entitled to access your data in our possession. Your right to access may be exercised in accordance with the relevant data protection legislation.

**For more information, please contact us at [info@decimalchain.sg](mailto:info@decimalchain.sg)**

## **16. MODIFICATIONS OF THE PRIVACY POLICY**

Any modifications of our Privacy Notice will be posted on this page and, if necessary, sent to you by email.

Please regularly check the indicated page for changes and updates.

## **17. PROTECTION OF MINORS**

The platform services are not intended for persons under 18 (hereinafter referred to as “Minors”). We do not knowingly collect personal information from Minors.

If we find out that we have accidentally collected personal information from a Minor, we will take legally acceptable measures to remove this information from our records. The platform will require the User to close his / her account, prohibiting the use of its services.

**If you are a parent or a guardian of the Minor who has provided his / her personal data to the platform, please contact us at [info@decimalchain.sg](mailto:info@decimalchain.sg)**

## **18. OUR CONTACT DETAILS**

Please address any questions, comments and requests regarding this Privacy Policy to [info@decimalchain.sg](mailto:info@decimalchain.sg).

**If you believe that your questions or issues have been left unanswered or unsolved, please contact our personal data operator at [info@decimalchain.sg](mailto:info@decimalchain.sg)**

## **19. DISPUTE RESOLUTION**

**19.1.** Before taking legal action following the disputes between the User and the Website Administration, it is necessary to file a claim (make a written proposal for voluntary settlement).

**19.2.** The claimee shall notify the claimant in writing of the results of the claim consideration within thirty (30) calendar days from the date of its receipt.

**19.3.** If the agreement is not reached, the dispute will be referred to the judicial authority in accordance with the applicable laws of Singapore.

**19.4.** The current laws of Singapore apply to this Privacy Policy and the relationship between the User and the Site Administration.