

Privacy Policy

Effective Date:

Version: 1.0

1. Introduction

1.1 Purpose of the Policy

This Privacy Policy ("Policy") governs the collection, processing, use, storage, and transfer of Personal Data by CIFDAQ BLOCKCHAIN ECOSYSTEM GLOBAL INC.(hereinafter referred to as the "Company," "We," "Us," or "Our"), a corporation duly organized and operating under the laws of the Republic of Panama. The Policy applies to individuals ("Users" or "You") who access or use Our website, mobile application, or any other online services provided by the Company (collectively, the "Platforms").

1.2 Scope and Binding Nature

By accessing, browsing, registering for an account, or using the Platforms, You confirm Your agreement to be bound by this Policy, which constitutes a legal agreement between You and the Company. This Policy is an integral part of the Terms of Use governing Your relationship with Us. If You do not agree with the provisions of this Policy, You must cease using the Platforms immediately. Your continued use of the Platforms after being notified of any amendments or updates to the Policy shall be deemed as Your acceptance of such changes.

1.3 Updates and Modifications

We reserve the right to update, amend, or modify this Policy at any time. Any material changes to this Policy will be communicated to You via the Platforms or email, and such changes will become effective immediately upon being posted on the Platforms. It is Your responsibility to review this Policy periodically to ensure You remain informed of any updates.

2. Definitions

For the purpose of this Policy, the following terms shall have the meanings ascribed to them:

2.1 Personal Data

"Personal Data" means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.

2.2 Sensitive Personal Data

"Sensitive Personal Data" refers to a subset of Personal Data, which includes data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data,

biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. This type of data is subject to more stringent protection under applicable data protection laws.

2.3 Data Controller

The "Data Controller" is the entity that determines the purposes and means of processing Personal Data. The Company acts as the Data Controller concerning the Personal Data collected from Users under this Policy.

2.4 Processing

"Processing" means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether by automated means or not, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, combination, restriction, erasure, or destruction.

2.5 Data Subject

The "Data Subject" is any natural person whose Personal Data is processed by the Company.

3. Legal Basis for Processing Personal Data

We will only process Your Personal Data where We have a lawful basis to do so. The legal bases upon which We rely for the collection, use, and processing of Your Personal Data include the following:

3.1 Contractual Necessity

We process Your Personal Data because it is necessary to perform Our contractual obligations to You, including to provide You with the services You have requested (such as access to Your account or facilitating a financial transaction) or to take steps at Your request prior to entering into a contract (such as verifying Your identity).

3.2 Legal Obligation

We process Your Personal Data to comply with legal obligations to which We are subject, including obligations under applicable data protection laws, tax laws, AML/CFT laws, and other regulatory requirements. For example, We may be legally required to retain certain data for tax reporting, regulatory compliance, or to respond to lawful requests by governmental authorities or law enforcement agencies.

3.3 Legitimate Interests

We may process Your Personal Data when it is necessary for the legitimate interests of the Company, provided that such processing does not unduly prejudice Your rights or freedoms. Examples of legitimate interests include using Your Personal Data to improve the functionality of Our Platforms, secure Our systems, prevent fraud, or analyze user behavior to enhance Your experience.

3.4 Consent

Where We rely on Your consent to process Your Personal Data, You will be asked to explicitly agree to the processing before We collect or use Your data. You have the right to withdraw Your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

4. Categories of Personal Data Collected

The following categories of Personal Data may be collected, processed, and stored by the Company:

4.1 Personal Information Provided by You

We may collect Personal Data that You voluntarily provide to Us, including but not limited to:

- Identification Data: Full name, date of birth, gender, nationality, government-issued identification (e.g., passport, driver's license, national ID).
- Contact Data: Email address, telephone number, residential address.
- Financial Data: Bank account information, credit/debit card numbers, cryptocurrency wallet addresses, tax identification numbers, and transaction history.
- KYC/AML Information: Copies of identification documents, income verification, and other information required to comply with regulatory requirements.
- Communications Data: Any messages, queries, or feedback You provide to Us via email, customer support, or through the Platforms.

4.2 Automatically Collected Data

Certain Personal Data may be automatically collected when You use the Platforms, including:

- Device Data: Internet Protocol (IP) address, device identifiers (IMEI, MAC address), operating system, browser type and version, and mobile network information.
- Usage Data: Details of Your interactions with the Platforms, including page views, clicks, login times, transaction records, and other user behaviors.
- Location Data: Geolocation data, provided that You have enabled location services on Your device.

4.3 Data Collected from Third Parties

We may obtain information about You from third parties, such as credit reference agencies, identity verification providers, payment processors, and other service providers. This information may be combined with the data You provide directly to Us to enhance the accuracy of Our records.

5. Purpose of Processing Personal Data

The Personal Data We collect will be processed for the following purposes:

5.1 Provision of Services

We process Your Personal Data to create and manage Your account, facilitate the execution of

transactions, and provide related services, including customer support, account maintenance, and notifications of service updates.

5.2 Regulatory Compliance

We process Personal Data to comply with our obligations under Panamanian law, including AML/CFT regulations, tax laws, and other legal requirements. This includes verifying Your identity, conducting background checks, and reporting suspicious transactions to regulatory authorities as required by law.

5.3 Fraud Prevention and Security

We process Personal Data to detect, investigate, and prevent fraud, money laundering, unauthorized access, and other unlawful activities. This involves monitoring transactions, reviewing user behavior, and implementing security protocols to protect Our Platforms.

5.4 Improvement of Services and User Experience

We process Personal Data to analyze how Users interact with the Platforms, in order to improve functionality, optimize performance, and develop new features. This includes the use of aggregated data for statistical analysis, research, and business planning.

5.5 Marketing and Promotional Communications

Where We have obtained Your consent, We may process Your Personal Data to send You promotional materials, offers, newsletters, and other marketing communications. You may opt out of receiving such communications at any time by following the unsubscribe instructions provided in the communication.

6. Sharing and Disclosure of Personal Data

We may disclose Your Personal Data to the following categories of recipients under the conditions outlined below:

6.1 Service Providers and Contractors

We may share Your Personal Data with third-party service providers who assist Us in operating the Platforms, processing transactions, and providing related services. These service providers are contractually obligated to protect Your data and are only authorized to use Your Personal Data as necessary to provide their services.

6.2 Regulatory Authorities and Law Enforcement

We may disclose Your Personal Data to governmental authorities, regulatory bodies, or law enforcement agencies if We are required to do so by applicable laws or regulations, or in response to a subpoena, court order, or other legal processes.

6.3 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of assets, Your Personal Data may be transferred to the new entity as part of the transaction. Any such transfer will be subject to the same privacy protections that apply under this Policy.

6.4 Affiliated Entities

We may share Your Personal Data with Our affiliates or subsidiaries for purposes consistent with this Policy, such as for internal business processes or to provide You with additional services.

6.5 With Your Consent

We may share Your Personal Data with other third parties when You have explicitly consented to such disclosure.

7. Cross-Border Data Transfers

7.1 International Data Transfers

As a global entity, Your Personal Data may be transferred to and processed in jurisdictions outside of Panama, including countries that may not offer the same level of data protection as Panama or the European Union. However, We will ensure that any such transfers comply with applicable data protection laws and provide adequate safeguards to protect Your Personal Data.

7.2 Legal Mechanisms for Data Transfers

In cases where Personal Data is transferred outside of the European Union or other jurisdictions with stringent data protection laws, We will use legal mechanisms such as standard contractual clauses, binding corporate rules, or reliance on adequacy decisions to ensure that Your Personal Data is protected to the same standard as required by applicable laws.

8. Data Retention

8.1 Retention Period

We will retain Your Personal Data for as long as necessary to fulfill the purposes for which it was collected, including maintaining Your account, facilitating transactions, complying with legal obligations, resolving disputes, and enforcing agreements.

8.2 Extended Retention for Legal or Regulatory Obligations

In some cases, We may be required to retain certain Personal Data for an extended period if it is necessary for regulatory compliance, legal claims, audits, or other legitimate purposes, such as resolving potential disputes or enforcing Our policies.

9. Data Security

9.1 Security Measures

We take appropriate technical and organizational measures to safeguard Your Personal Data from unauthorized access, disclosure, alteration, and destruction. These measures include, but are not limited to, the use of encryption technologies, secure access controls, firewalls, and regular security assessments.

9.2 User Responsibility for Account Security

While We employ advanced security protocols to protect Your Personal Data, You are responsible for ensuring the security of Your account credentials. You should avoid sharing Your password and ensure that two-factor authentication (2FA) is enabled where available.

9.3 Breach Notification

In the event of a data breach that may compromise Your Personal Data, We will notify You and any applicable regulatory authority of the breach in accordance with Our legal obligations under applicable data protection laws.

10. Your Rights as a Data Subject

Under applicable data protection laws, You have certain rights regarding the Personal Data We process about You. These rights include:

10.1 Right of Access

You have the right to request a copy of the Personal Data We hold about You and to obtain information about how that data is being processed.

10.2 Right to Rectification

You have the right to request the correction of any inaccurate or incomplete Personal Data that We hold about You.

10.3 Right to Erasure ("Right to Be Forgotten")

You may request the deletion of Your Personal Data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected or when You have withdrawn consent to its processing.

10.4 Right to Restriction of Processing

You may request that We restrict the processing of Your Personal Data in certain situations, such as when You dispute the accuracy of the data or object to its processing.

10.5 Right to Data Portability

You have the right to receive Your Personal Data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller where technically feasible.

10.6 Right to Object

You may object to the processing of Your Personal Data for direct marketing purposes or on other legitimate grounds relating to Your particular situation.

10.7 Right to Withdraw Consent

If We rely on Your consent for processing Personal Data, You may withdraw this consent at any time.

However, the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

11. Cookies and Tracking Technologies

11.1 Use of Cookies

We use cookies and similar tracking technologies to enhance Your user experience, analyze user behavior, and improve the performance of Our Platforms. Cookies are small data files that are stored on Your device when You visit the Platforms.

11.2 Types of Cookies Used

We use both session cookies (which expire when You close Your browser) and persistent cookies (which remain on Your device until deleted) to provide a more personalized experience. These cookies help Us understand how You interact with the Platforms, remember Your preferences, and ensure that Our Services function properly.

11.3 Third-Party Cookies

Our Platforms may also use cookies from third-party service providers, such as analytics providers and advertising networks. These third parties may use cookies to collect information about Your interactions with the Platforms, as well as other websites.

11.4 Managing Cookies

You can control or block cookies through Your browser settings. However, please note that disabling cookies may affect the functionality of certain features on the Platforms.

12. Children's Privacy

12.1 No Collection of Data from Minors

Our Platforms and Services are not intended for individuals under the age of 18. We do not knowingly collect Personal Data from individuals under the age of 18 without the consent of a parent or guardian. If We become aware that We have inadvertently collected Personal Data from a minor without such consent, We will take steps to delete the information promptly.

13. Changes to this Policy

13.1 Right to Modify Policy

We reserve the right to modify or update this Policy at any time to reflect changes in Our business practices, legal requirements, or regulatory obligations. Any significant changes to this Policy will be communicated to You via email or through the Platforms.

13.2 Continued Use of Platforms

Your continued use of the Platforms following any changes to this Policy constitutes Your acceptance of the updated Policy.

14. Grievances and Contact Information

14.1 Contact Information

If You have any questions, concerns, or complaints regarding this Policy or how Your Personal Data is handled, please contact Us at: **dpo@cifdaq.com**

14.2 Grievance Procedures

If You are not satisfied with Our response to any data protection-related concerns, You have the right to lodge a complaint with the relevant supervisory authority in Your jurisdiction.