

PRIVACY POLICY

Last updated: 19.10.2025

Please carefully read this Privacy Policy ("**Policy**"), which governs how Liberion Group S.A., a company incorporated under the laws of Panama, reg. number: 155774188 ("**Company**", "**we**") collects, uses and discloses information, when you interact or use the Platform, products and services, and any other sites or services that link to this Privacy Policy, or when you otherwise interact with us.

1. Applicability and Acceptance of Policy

- 1.1. This Policy defines the Personal Data, explains how Personal Data is collected, used, processed, and disclosed.
- 1.2. By registering in the personal account through the Platform and ticking the "I agree with the Privacy Policy", you unconditionally accept and adhere to provisions of this Policy without any exemptions, limitations and/or exclusions.
- 1.3. In the event you disagree with any provision of this Policy or would not like to provide your consent for processing of your Personal Data.
- 1.4. All terms specified in the Privacy Policy are interpreted in accordance with this Policy, Terms of Use, and applicable personal data laws.

2. Information about the Data Controller

- 2.1. Liberion means Liberion Group S.A., a company incorporated under the laws of Panama, reg. number: 155774188. Contact details: top@liberion.com.
- 2.2. Under applicable data protection legislation, we are the controller of your Personal Data we process ("**Controller**") and determine the purposes and means of the processing of Personal Data.
- 2.3. We may also act as a data processor when processing your Personal Data in accordance with the purposes and by the means determined by our clients by connecting our Platform through SDK. In this case, the processing of your Personal Data is governed by the privacy policy of each client.

3. Legal Grounds for Personal Data Processing

- 3.1. We process your Personal Data on the basis that it is:

- 3.1.1. **Necessary for the performance of a contract**, therefore, where we have a contract with you, we will process your Personal Data in order to fulfill that contract (in particular, to provide access to participate in the Program);
- 3.1.2. **Authorized by your Consent**, which you give us as it is set out in section 4 hereof;
- 3.1.3. **Necessary for compliance with our legal obligation**, in particular, when we are obliged to respond to a court order or a regulator;
- 3.1.4. **Necessary for performance our legitimate interests**;
- 3.1.5. **Permitted by applicable legislation**;
- 3.1.6. **Our client's instruction to process Personal Data**.
- 3.2. We process the Personal Data for a number of legitimate interests, including to provide and improve the Platform, administer our relationship with you and our business, for marketing, and in order to exercise our rights and responsibilities as specified in section 6 of the Agreement.

4. Consent to Personal Data Processing

- 4.1. To process your Personal Data we need to receive your consent, as it is prescribed by other applicable law, we will process your Personal Data in the case we have received from you a freely given, specific, informed and unambiguous indication of your wishes by which you signify agreement to the processing of your Personal Data ("**Consent**").
- 4.2. ***By registering in the personal account through the Platform and ticking the "I agree with the Privacy Policy", you unconditionally agree to this Policy and the terms of processing your Personal Data specified herein. If you do not agree with these terms, you should refrain from registering in the Program.***
- 4.3. Your Consent covers all processing activities with your Personal Data carried out for the same purpose or purposes. When the Processing has multiple purposes, your Consent should be deemed given for all of them, unless otherwise provided by this Policy.
- 4.4. You have the right to withdraw your Consent at any time. You can submit such a request by email to top@liberion.com.

- 4.5. Your withdrawal of Consent shall not affect the lawfulness of your Personal Data processing based on Consent before its withdrawal.
- 4.6. Except as required or enabled by law we will not use or disclose your Personal Data for any purpose for which you refuse Consent or later withdraw your Consent. If you withdraw Consent, you agree that in spite of this withdrawal, we may continue to use those Personal Data previously provided to us to the extent that we are contractually or otherwise legally obliged to do so and to the extent necessary to enforce any contractual obligation you may have towards the Company or in any other way permitted by law.

5. Collection of Personal Data

5.1. General Provisions

- 5.1.1. The type of Personal Data we collect depends on how you are interacting with us. In many cases, you can choose whether or not to provide us with Personal Data, but if you choose not to, you may not get full functionality of the Platform. When you visit the Platform, you may provide us with the following types of Personal Data: **(i)** Personal Data that you voluntarily disclose that is collected on an individual basis; **(ii)** Personal Data collected automatically when you use the Platform.
- 5.1.2. Personal Data hereof is collected only when voluntarily offered, and solely for purposes that are clearly identified on the Platform or in this Policy.

5.2. Personal Data You Provide on the Platform

- 5.2.1. In order to fulfill our obligations on provision of an access to Platform, we are entitled to ask you to provide us with your Personal Data, including:

<i>Purpose of Personal Data Processing</i>	<i>Personal Data Category</i>
Registration and authorization of the Client on the Platform. Providing access to the Platform	E-mail address

Customer support services	Full name; Information and documents sent to the support service
KYC verification to use all the features of the Platform	Full name; Identification document data, including passport series, number, date of issue and issuing authority, place and date of birth, registration address; Photo; Company documents (if applicable) Important: Liberion does not have access to such Personal Data according to the clause 9 of this Privacy Policy
Processing of completed contact forms	E-mail address; Full name; Other personal data requested in the contact form
Processing of requests to the Liberion's e-mail	E-mail address; Personal Data contained in the text of the letter
Direct marketing	E-mail address

5.2.2. We may collect the Personal Data from you in a variety of ways and circumstances, including, but not limited to, registration at the Program, subscription to a newsletter, filling out a form, providing us with feedback via email. We shall be entitled to combine Personal Data collected in the course of your interaction with different sections of the Platform with any other relevant available information.

5.2.3. Our clients may use our identity verification services by connecting our platform via the SDK. In this case, we process the Personal Data of their Users on behalf of our clients, including the following Personal Data:

<i>Purpose of Personal Data Processing</i>	<i>Personal Data Category</i>
KYC verification to execute our client's instruction	Full name; Identification document data, including passport series, number, date of issue and issuing authority, place and date of birth, registration address; Photo Important: Liberion does not have access to such Personal Data according to the clause 9 of this Privacy Policy

5.2.4. Our clients control and are responsible for correcting, deleting or updating the Personal Data processing and for complying with any regulations or laws that require providing notice, disclosure, and/or obtaining consent prior to transferring the Personal Data to us for processing purposes.

5.3. **Personal Data We Collect Automatically**

5.3.1. Personal Data collected by or transmitted to the Company in the course of accessing, interacting and operating of the Platform may include the following Personal Data:

<i>Purpose of Personal Data Processing</i>	<i>Personal Data Category</i>
Platform's functionality, analytics, and improvement	Cookies, web beacons
Customer support services	Technical information about the device; Date and time of authorization on the Platform; List of used tool

6. Disclosure of Personal Data

- 6.1. We treat Personal Data as confidential and may not pass on or use any such data without valid legal grounds.
- 6.2. We will only disclose your Personal Data in the following circumstances:
 - 6.2.1. With your Consent or at your instruction;
 - 6.2.2. With companies under common control or ownership with us or our offices internationally;

6.2.3. For everyday business purposes, such as to process transactions, maintain accounts, send marketing newsletter, respond to court orders and legal investigations. We may instruct some companies (Processors) to protect your Personal Data for the purposes determined in this Privacy Policy:

- IT service providers, data disposal service providers , data enrichment services and data storage service providers.
- Companies that help us provide our services to you e.g. our customer service function to handle your enquiries.
- Hosting providers.

6.2.4. In connection with a merger or sale of our company assets, or if we do a financing or are involved in an acquisition, or any other situation where Personal Data may be disclosed or transferred as one of our business assets;

6.3. Where we share your Personal Data with our service providers, we enter contracts to ensure they also protect your Personal Data in line with applicable data protection law and to this Privacy Policy.

6.4. We may without limitations share aggregated or de-identified information, which cannot reasonably be used to identify you.

6.5. We do not share Users' Personal Data when logging in to our partners' services. You can at any time report the misuse of your Personal Data and/or ask us to restrict access to your Personal Data in accordance with this Policy and applicable law. Please note that certain functions of the Platform may be unavailable to you.

7. International Transfer of Your Personal Data

7.1. Information about you may be transferred to, and processed in countries other than the country in which you are a resident. These transfers will only happen when:

- There is a legal or regulatory obligation;
- To meet our contractual obligation with you or about to enter with you; or
- We have your consent.

7.2. When we transfer your Personal Data to a Program Partner, service provider, staff member outside applicable jurisdiction, we will implement safeguards

so that your data continues to be protected. We protect your data by making sure:

- The country has adequacy protection; or
- We conduct a security and data protection transfer assessment and put an appropriate contract in place with standard contractual clauses between the Program Partner, service provider, staff member and us.

8. Protection of Personal Data. Security Measures

- 8.1. We take appropriate security, administrative and technical measures to protect any Personal Data you provide regarding the collection, storage and processing of Personal Data, as well as security measures to protect your Personal Data against unauthorized access, modification, disclosure or destruction.
- 8.2. **Personal Data received through KYC is stored encrypted in an external distributed storage (InterPlanetary File System, IPFS), and only hashes are recorded in the blockchain.**
- 8.3. Other Personal Data (for example, when you send us an email) is safeguarded from unauthorised access and unlawful processing or disclosure, as well as accidental loss, modification or destruction, through state-of-the-art technical and organisational measures. These are adjusted and updated continuously in tandem with technical developments and organizational changes. Additionally, Personal Data protection audits and other controls are carried out on a regular basis.
- 8.4. However, no computer security system is entirely foolproof, and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the Personal Data you submit to or receive from us through the Internet, or for any unauthorized access or use of that information, and we cannot and do not guarantee that information communicated by you to us or sent to you by us will be received, or that it will not be altered before or after its transmission to us. You agree to not hold the Company liable for any loss or damage of any sort incurred as a result of any misappropriation, interception, modification, deletion, destruction or use of information provided through the Platform.

9. Retention of Your Personal Data

- 9.1. In accordance with applicable laws and as needed to fulfill our obligations, we may hold your Personal Data. This requirement is conditioned by a need to comply with legal obligations and resolve possible disputes.
- 9.2. **Your Personal Data received through KYC is stored encrypted in an external distributed storage (InterPlanetary File System, IPFS), and only hashes are recorded in the blockchain. Liberion does not have access to such Personal Data.**
- 9.3. We may retain some Personal Data you provide to us (for example, when you send us an email) until your consent is withdrawn or Terms of Use are terminated. After your consent is withdrawn or Terms of Use are terminated, the data may be stored for a period of time to comply with legal and regulatory requirements, resolve disputes and prevent money laundering, fraud and other illegal activities.

10. Your Rights in relation to Personal Data

- 10.1. The Company is committed to making sure you can exercise your respective rights effectively and free of charge. The Company will ensure each your request related to your Personal Data be reviewed in a timely fashion.
- 10.2. You have the following rights relating to your Personal Data in accordance with any applicable laws:
 - 10.2.1. **Right to access.** You can request access to your Personal Data and obtain a copy of such Personal Data in a format acceptable to you (e.g. PDF, DOC, DOCX, etc.). You can submit such a request by sending an email to top@liberion.com. After your request is received, our privacy team reviews the form and conducts the requestor's identity verification, without undue delay. Upon successful verification, you are provided with a copy of your Personal Data.
 - 10.2.2. **Right to data portability.** You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another service provider without hindrance from us.

10.2.3. **Right to erasure ("Right to be forgotten") and right to rectification.** You are entitled to request erasure or rectification of your Personal Data by sending an email to top@liberion.com. We will handle requests for Personal Data to be rectified or deleted, unless there is a legal requirement that prohibits such requests to be fulfilled. When a request is fulfilled, you will be informed that your Personal Data is changed or erased and is not-longer collected, however, to fulfil our legal requirements the Company will store information about each requestor for the purposes of providing evidence that a request has been fulfilled.

10.2.4. **Right to object.** At all times, you are entitled to object to Processing of your Personal Data. Right to object can be exercised by sending an email to top@liberion.com. Upon receipt of the request, the Company ceases the Processing, unless there is a legal or statutory ground for such Processing.

10.2.5. **Right to be informed.** If you are inquiring about Processing activities conducted with respect to your Personal Data, the Company, without undue delay, will provide information about: **(i)** purposes of Processing; **(ii)** categories and types of Personal Data; **(iii)** the recipients or categories of recipients to whom the Personal Data have been or will be disclosed to, in particular recipients in third party countries or international organizations **(iii)** retention period; **(v)** source of the relevant Personal Data; **(vi)** privacy rights and information on data portability; **(vii)** where the Personal Data are not collected from the data subject, any available information as to their source; **(viii)** the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject; **(ix)** information as to whether Personal Data are transferred to a third country or to an international organization. Where this is the case, the data in subject to, shall have the right to be informed of the appropriate safeguards relating to the transfer. However, all

information about the categories of Personal Data and Processing operational conducted by the Company is available in this Policy.

10.2.6. Right to lodge a complaint with a supervisory authority.

Supervisory authority means an independent public authority, which is established by an applicable law.

10.2.7. Please note that each request to our e-mail regarding your Personal Data must be accompanied by a corresponding note (for example, with the note "Withdrawal of consent to the processing of personal data").

11. Minimum age

- 11.1. The Company will not knowingly collect Personal Data from anyone under the age of 18.
- 11.2. If minors, when using the Platform, have provided their Personal Data without parental consent, including data that is provided purposefully and data that is collected automatically, parents of minors may submit a request to our email top@liberion.com to stop processing the Personal Data of such minors.

12. Alterations to Policy

- 12.1. We have the right, at our discretion, to update this Policy at any time. We recommend that you frequently check this Policy to find any changes and stay informed about how we help protect the Personal Data.
- 12.2. By using the Platform, you will acknowledge and agree that it is your responsibility to periodically review this Policy and be aware of the changes.
- 12.3. The subsequent use of the Platform after changes to this Policy will also be considered as your acceptance of these changes.
- 12.4. This Policy may from time to time be translated into other languages. To the extent that any discrepancy may exist between the English version of this Policy and its version in another language, the English version prevails.

13. Data Protection Officer

- 13.1. The Company appoints an expert on data privacy who works independently to ensure that the Company is adhering to the policies and procedures set

forth in the applicable law (data protection officer). Data protection officer assists the Company to monitor internal compliance, inform and advise on data protection obligations, provide advice regarding data protection impact assessments (DPIAs) and act as a contact point for data subjects and the supervisory authorities.

14. Feedback

- 14.1. We welcome your questions and suggestions with respect to the implementation or amendment of this Policy. Please use this feedback for communicating with us by sending an email to top@liberion.com.