

## Cipher Privacy Policy

The objective of this Privacy Policy is to set out in an accountable and transparent way the manner in which Cipher collects and uses your Personal Information

### **Information We Collect Automatically from our Services**

When you use our Services, we automatically collect information about you as follows:

**Transaction Information:** We collect and store transaction details related to your use of our Services, including information about your Cipher Account balances, trades, deposits, withdrawals, order activity, and any other transactions that you conduct or attempt to conduct through the Services.

**Log Information:** We collect standard server logs in connection with your use of our Services, which may include the type of browser you use, access times, pages viewed and IP address.

**Device Information:** We collect information about the computer or mobile device that you use to access our Services, including the hardware model, operating system and version, browser version, unique device identifiers and mobile network information.

**Location Information:** We may collect and use information to identify the location from which the services are being accessed in connection with providing the services.

**Information Collected by Tracking Technologies:** We may use various technologies to collect information in connection with your use of our Services.

The technologies we use include the following:

Mobile device identifiers, which are used on mobile devices and perform functions similar to cookies and pixel tags; and

Cookies, which are small files that are sent to your computer or mobile device when you visit a website. Cookies allow our Services to recognize your browser and track your usage each time you visit. You can usually decline or remove cookies through your browser, but doing so may interfere with your use of Services; and

Local storage, which stores data locally in your browser.

**1. Collecting Personal Information:** If you wish to transact on and use the Site, Cipher will collect information about you, including Personal Information. The Personal Information most often collected and maintained in a customer file includes, but is not limited to, name, address for service, government identification, and banking information.

**Personal Information is collected in order to:**

1. establish and maintain a responsible commercial relationship with you;
2. understand your needs and your eligibility for products and services;
3. inform you about trading and financing features;
4. provide information to you about developments and new products, including changes and enhancements to the Site;
5. develop, enhance, and market products and services, and provide products and services to you;
6. process billing and collection of any fees;
7. conduct surveys and get feedback from you;
8. deliver products and services to you;
9. provide you with news and other matters of general interest to you as a Cipher customer; and, to meet Cipher's legal and regulatory requirements.

The Site may use a browser feature called a "cookie" to collect information anonymously and track user patterns on Cipher. A cookie is a small text file containing a unique identification number that identifies a customer's browser, but not the customer personally, each time that customer visits a website using cookies. Cookies tell Cipher which pages of the Site are visited and how many people visited each one. This helps enhance visitors' online experience. Cookies also serve to identify your computer so that your preferences can be saved for future visits, and Cipher may work with third parties that use these cookies to help us.

The use of cookies is an industry standard and many major browsers are initially set up to accept them. You can reset your browser to either refuse to accept all cookies or to notify you when you have received a cookie. However, if you refuse to accept cookies, you may not be able to use some of the features available on the Site.

**2. Consent:** Consent is required for the collection of Personal Information and the subsequent use or disclosure of Personal Information. The form of consent may vary, depending upon the circumstances and the type of Personal Information obtained. In the case of Cipher, your agreement with the Terms of Service constitutes your consent to the collection and use of Personal Information as described in this Privacy Policy. Sometimes, Cipher may reach out to you for consent to obtain and then use further information, and Cipher reserves the right to do so. In exceptional circumstances, as permitted by applicable law, Cipher may collect, use and disclose Personal Information without your knowledge or consent.

**3. Using Personal Information:** Cipher is committed to protecting your privacy. Internally, only employees with a business need to know Personal Information, or whose duties reasonably require access to it, are granted access to customers' Personal Information. The Site's systems and data are constantly reviewed to ensure that you are getting the best possible service and that leading security features are in place.

We must reserve the right to retain and share certain Personal Information in order to meet our regulatory requirements and further to our contractual agreements with partners and third parties.

Cipher uses IP addresses to analyze trends, administer the Site, track user movements, and gather broad demographic information for aggregate use. For systems administration and detecting usage patterns and troubleshooting purposes, Cipher's web servers also automatically log standard access information including browser type, access times/open mail, URL requested, and referral URL. This information is not shared with third parties and is used only within Cipher on a need-to-know basis. Cipher reserves the right to block access for any user accessing the Site via a proxy service intending to conceal originating identity.

Cipher 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 Tokens traded on the Site.

Personal Information and other data may be exported outside of the jurisdiction in which you reside. Your Personal Information 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 Information through foreign laws. You need

to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside.

**4. Protecting Your Personal Information:** This Privacy Policy and the use of your Personal Information only applies to the information you provide. You are cautioned that if you disclose Personal Information or personally sensitive data through use of the Internet, such as through chat rooms, communities, bulletin boards, or other public online forums, this information may be collected and used by other persons or companies over which Cipher has no control. It is your responsibility to review the privacy statements, policies, terms, and conditions of any person or company to whom you choose to link or with whom you choose to contract. Cipher is not responsible for the privacy statements, policies, terms, conditions, or other content of any website not owned or managed by Cipher.

Cipher does its best to protect and safeguard Personal Information, but there are protective measures you should take, as well. Do not share your Personal Information with others unless you clearly understand the purpose of their request for it and you know with whom you are dealing. Do not keep sensitive Personal Information in your e-mail inbox or on Webmail. If you are asked to assign passwords to connect you to your Personal Information, you should use a secure password and always use two-factor authentication (2FA), where available. You should change your password regularly.

**Disclosure of personal information to third parties:**

- a. The User acknowledges that to enable the provision of the Website, Platform and Services to the User, it may be necessary in certain circumstances for the Company to share the User's personal data with third parties such as affiliates of the Company, or any third parties engaged by the Company to provide Services and features targeted at the User, that are most likely to meet the User's needs, and to customize and improve the Website and the general experiences of its users, including for any research or analysis of the data collected.
- b. In general, the Company will not disclose your personal data except in accordance with the following:
- c. Where we disclose your personal data to third parties, we will employ our best efforts to require such third parties to protect your personal data.

- in order to carry out the purposes for which such personal data was collected;
- where the User has consented;
- where disclosure is clearly in the User's interests, and if User consent cannot be obtained in a timely way;
- where permitted under the PDPA or other applicable law; or
- if required by applicable law.

d. Except as otherwise stated in this Policy or the TOS, the Company shall not sell or license to any third parties any personal data that it collects from a User.

### **Third Party Storage**

The Company and the Website uses international web hosting facilities and cloud server services which are maintained in accordance with tight security standards and applicable laws.

### **Security**

While no online or electronic system is guaranteed to be secure, Cipher takes reasonable measures designed to protect the information we collect from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. In particular, we implement reasonable security practices and procedures designed to protect the confidentiality and security of this information in accordance with, and prohibit disclosure other than as permitted by, this Privacy Policy. We also use reasonable measures designed to limit access to the information we collect about you to employees and agents that have a business reason to know such information.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us at [info@cipherex.net](mailto:info@cipherex.net)