

NB PAY FZCO Privacy Policy

The purpose of this Privacy Policy (hereinafter referred as **“Policy”**) is to inform you as to what information may be collected by NB PAY FZCO, a company registered in Dubai Silicon Oasis, DDP, Building A1, Dubai, United Arab Emirates, and with company registration number DSO-FZCO-13633, from 22-Mar-2022 (hereinafter referred as **“the Company”**, **“we”**, **“us”**, **“our”**) from you when you visit our Website <http://nbp.ae/> (hereinafter referred as **“this Website”** or **“our Website”**) or when you use NB PAY software published on our Website, how such information will be used by us, with whom such information may be shared, your choices regarding the collection, use, and disclosure of such information, your ability to edit, update, correct, or delete such information and the security procedures that we have implemented to protect your privacy.

Information Collection

On various occasions you may be asked for certain types of personally identifiable information, such as:

- your first and last name;
- username, password in NB PAY;
- citizenship;
- phone number;
- e-mail address;
- cryptocurrency address;
- other personal information you choose to provide;
- other personal information we obliged to obtain from you in accordance with our AML Policy.

We hope that you will provide us with this information. However, if you do not want to disclose your personally identifiable information to us, please do not submit it. This means that in some cases we will not be able to provide you the service you have requested. By submitting your personal information on our Website you agree and give your consent to us for collecting, processing, using, storing and disclosing your personally identifiable information.

We may also collect non-personally identifiable information from you when you visit the Website (e.g. IP address, browser type, domain name, the date and time of visits, the pages viewed, time spent at our Website etc.) or when you use the software published on our Website. This information is collected and analyzed in the aggregate in order to improve the functioning and content of the Website.

We may expand the list of personally identifiable information requested from you by amending this Policy.

Use of Information

We use the information provided by you for a variety of purposes. You will be informed as to these purposes at the time the information is collected. In general, however, we foresee the following purposes:

- provide you with the access to digital assets;
- provide you with the access to experimental technology and software;
- understand and meet your needs and preferences;

- develop new and enhance existing service and product offerings;
- manage and develop our business and operations;
- carry out any purposes for which we have received your consent;
- monitoring and analyzing trends, usage and activities in connection with our Website;
- marketing purposes (add you to our email subscription list, send you promotional materials, etc.);
- meet legal and regulatory requirements.

Non-personally identifiable information may be used to analyze trends and statistics, enhance the Website's operation, and serve content and advertisements.

Processing

We will process your personal data legally and fairly and not use it outside the purposes of which we have informed you. So far as we are able we shall ensure that all of your personal data is accurate and up to date.

Storage of personal data

Data provided to us is stored in accordance with applicable laws of the jurisdiction of the data subject, at secure locations. We take reasonable steps to ensure that the personal information we collect about you remains accurate, timely, and secure. You shall understand that your personal data might be processed and stored by our counterparties who provide us with services for processing and storing your personal data in various geo (jurisdictions of data subject). All such third parties will be contractually bound to protect data in compliance with our policy. We take all necessary organizational and technical measures to protect personal data from unauthorized or accidental access to such data, destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure and while we strive to protect your personal information, we cannot guarantee or warrant its complete security. We shall not be responsible for losses that you or any person may suffer as a result of a breach of confidentiality in respect to your use of the Website or any information you transmit to the Website. Also, we do not assume any responsibility for the 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 us and our respective past, present and future employees, officers, directors, contractors, consultants, advisers, equity holders, suppliers, vendors, service providers, parent companies, subsidiaries, affiliates, agents, representatives, predecessors, successors and assigns (collectively, the "our Parties") 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 our Website.

Disclosure of personal data

We will only share your personal data in the following ways:

- with your consent or at your instruction;

- within our current company;
- with third parties or service providers that perform work for us;
- analytics and search engine providers that assist us in the improvement and optimization of our Website;
- 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 Information may be disclosed or transferred as one of our business assets.

We may disclose information that we collect about you should we have reason to believe that:

- it is necessary to identify, contact, or bring legal action against persons or entities who may be causing harm to you, us, or others;
- it is necessary because of official inquiry of governmental authorities;
- it is necessary securing compliance with law's provision or with requirements of judicial proceedings concerning us;
- we may also disclose information when we believe the law requires it.

Access or corrections to your information

You are able to correct, update or change your personal data provided to us. You can correct, update or change your personally identifiable information by sending us an e-mail or make it by yourself in your personal account if our Website gives you such opportunity.

In addition, you may request us to delete your personally identifiable information from our database. Upon your e-mail request to terminate the processing of your personally identifiable information, we will terminate processing your personal data. Our contact information is listed below. We will use commercially reasonable efforts to accommodate all such requests. Please, note that we cannot delete the transactions information from Blockchain.

You may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about your account (if you have one).

Cookies

Our Website use cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our Website. Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on your browser); however, switching off cookies may restrict your use of our Website.

Third-Party Links

The Website may contain links to web sites operated and maintained by third parties over which we have no control. Any information you provide to third party websites will be governed under the terms of each website's privacy policy and we encourage you to investigate and ask questions before disclosing any information to the operators of third party websites. We bear no responsibility or liability whatsoever for the content, actions, or policies of third party websites. The inclusion of third party websites on our Website in no way constitutes an

endorsement of such websites' content, actions, or policies. Please, check third-party's policies before you submit any personal data to these websites.

Protection of Children

The Website is a general audience website that is designed or targeted to people at least 18 years of age. We do not knowingly collect, use, or disseminate any personally identifiable information from children. If, however, we become aware that personally identifiable information regarding a child under the age of 18 has been collected on the Website we will make reasonable efforts to delete it from our records.

Social Sharing Features

Our Website may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with your contacts or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the privacy policies of the entities that provide these features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

Modifications to Policy

This Policy may be amended from time to time. We reserve the right to change this Privacy Policy at any time. Any changes to this Policy will be effective immediately upon posting the latest version on our Website. Your subsequent use of the Website shall be deemed as acceptance of such changes. Be sure to review this Policy periodically to ensure familiarity with its most current version. If you disagree with the changes in our Policy, however, please do not use the Website after the posting of such changes online. By using the Website following the posting of changes to this Policy, you agree to all such changes.

Questions or comments or how to contact us

If you have any questions about this Policy, please contact us at support@nbp.ae

This Privacy Policy is effective as of 01.01.2024.