

## Privacy Policy

## 1. OVERVIEW

CoinMENA (CoinMENA FZCO has been established in the UAE as Virtual Asset Service Provider). CoinMENA is a Free Zone Company under license from VARA. Please take the time to read this Privacy Policy carefully. If you have any questions about this Privacy Notice, please get in touch with our support team.

## 2. ACCEPTANCE OF THE PRIVACY POLICY

This Privacy Policy applies to all sites under the CoinMENA.io domain and the brand. If a client does not agree or accept any of the aspects of this Privacy Policy, the client must not access or create an account on CoinMENA. By accessing and using CoinMENA's services, the client signifies acceptance of the terms of this Privacy Policy. Where CoinMENA requires a client's consent to process their personal information, CoinMENA will ask for the client's consent to the collection, use, and disclosure of their personal information.

## 3. CHANGES TO THE PRIVACY POLICY

CoinMENA may from time to time amend this Privacy Policy. When the Privacy Policy is amended, CoinMENA will modify the date listed on the Agreement or notify clients of changes to the Privacy Policy via email or by means of a notice on our Services prior to the amendments becoming effective.

CoinMENA's Privacy Policy is reviewed regularly to ensure continuous compliance with regulations, changes to business operations and practices are taken into consideration, and changes to technologies. All client information held will be governed by CoinMENA's most recent Privacy Policy.

## 4. THE PERSONAL INFORMATION WE COLLECT

To open an account with CoinMENA, each client must initially enter his information to create an account with CoinMENA. Once the account has been created, each client must disclose personal information that will allow CoinMENA to assess the client's eligibility and comply with the relevant laws and the regulatory directives.

CoinMENA will collect the following information on each client:

- a) Full Name
- b) Email Address
- c) Telephone Number
- d) Proof of Identity (e.g., Passport/ID/Residency Visa)
- e) Self Portrait Photograph of the client holding their passport on the picture & main page
- f) Bank Statement and/or Salary certificate to verify the source of funds
- g) Bank details (e.g., Bank Name, Bank Account Holder Name, IBAN, Swift Code, Branch Address)
- h) Residential Address

CoinMENA will automatically collect the following non-personal information about each client:

- a) Location - IP address, referral website, login information, browser type, time zone, browser plug-in types and versions, operating system, and platform.
- b) Log Information - This information is generated through the client's use of CoinMENA's services. This includes device information, location information, system activity, internal information related to pages visited on the CoinMENA website including the full Uniform Resource Locators (URL), date and time of visit, page response times, length of visit on each page, page interaction information (clicks, scrolling, and mouse-overs) and download errors.
- c) CoinMENA may through third-party service providers, receive the following information:
- d) Client basic personal information such as name, address, and bank account details provided by the client's bank account or payment service provider.
- e) Anonymized or de-identified information about the client indicating how they found CoinMENA's website from advertising, analytics, and search information providers.
- f) Client background check information provided by identity verification companies to allow CoinMENA to analyze the client's digital identity for KYC onboarding, AML, sanctions screening, transaction monitoring, and fraud prevention.

CoinMENA will store client account information for a period of 10 years after account closure.

## 5. USE & DISCLOSURE OF YOUR PERSONAL INFORMATION

Through the collection of client information, CoinMENA aims to provide each client with a secure, efficient, and personalized experience. CoinMENA will only use and disclose each client's information as follows:

- a) Provide each client with an efficient, secure, and more personalized experience by analyzing client website usage and associated statistics. This will aid CoinMENA in further enhancing the website's layout, content, and overall services.
- b) Provide each client with relevant notices and communication related to their use of CoinMENA's services.
- c) To execute client trades related to order fulfillment, trade settlement, and currency receipt and distribution.
- d) Enforce CoinMENA's Compliance and User Agreements which each client has agreed to be bound by either in writing or through the use of CoinMENA's services or otherwise set forth in this Privacy Policy.

CoinMENA will not use or sell any client information to profit organizations or to non-profits for non-monetary purposes.

CoinMENA may disclose client information as and when required by the regulator or by law to comply with any judicial process, court orders, subpoenas, or any other relevant regulatory authority. CoinMENA does this to comply with its legal obligations, investigate fraud, and to protect its interests and those of our clients.

In the case where CoinMENA changes its products or services or laws, clients might be notified of such changes. CoinMENA might have to process a client's personal information to send such notifications. Clients will continue to receive such information even when they have opted not to receive direct marketing information from CoinMENA.

## 6. STORAGE OF PERSONAL INFORMATION

CoinMENA's operations are supported by a network of computers, servers, and other information technology infrastructure, which includes third-party service providers. By providing their information to

CoinMENA, a client consents to transfer and store their information on third-party servers that are located in the UAE. CoinMENA may use third-party services to collect and store clients' personal information.

## 7. DATA OWNER RIGHTS

### 7.1. Your legal rights

Under the provisions of the law, you are provided with the following rights in relation to the processing of your personal data. To exercise your rights under the law, you may be required to authenticate yourself with adequate proof of identity.

### 7.2. Right to Enquire

You have the right to request and obtain information on your personal data that we hold and the purpose for which it is maintained by us.

### 7.3. Right to Object

You have the right to object to being contacted by us for direct marketing purposes. On receipt of such objection, we will ensure that you are removed from the relevant marketing databases, as applicable. To opt-out from receiving direct marketing communications, please contact us at any time through the following channels:

Opt-out links: Contact our Support Team.

### 7.4. Right to Demand Rectification, Blocking, or Erasure

You may submit an application to request to rectify, block or erase your personal data, as the case may be, if the processing thereof is done in contravention of the provisions of the law, and in particular, if the data is incorrect, incomplete, or not updated, or if the processing thereof is illegal.

### 7.5. Right to Withdraw Consent

At any time, subsequent to providing consent, you have the right to withdraw the consent provided. Withdrawal of consent will be applicable to future use of the personal data and will not in any way impact legitimate use of the personal information prior to the withdrawal of the consent. Withdrawal of consent to process certain mandatory personal data related to services provided by CoinMena may result in our inability to continue the provision of those services.

### 7.6. Right to Complain

You may submit a complaint to the Authority if you have reason to believe that any violation of the provisions of this privacy law has occurred or that we are processing personal data in contravention of its provisions.

## 8. ACCOUNT CLOSURE

CoinMENA will upon a client's request to close their account in accordance with the applicable laws and regulations and in accordance with its User Agreement. The client must not have any outstanding balance due on their account to ensure closure. CoinMENA will retain and store a client's account, due diligence, and personal information, and any other recorded information, whether electronically, by telephone, or otherwise for a period of 10 years post-closure. This is done to abide by the regulations set forth by the regulator and to ensure that CoinMENA can fulfill any legal obligations that it has to comply with related to the law, fraud prevention, outstanding fee collection, dispute resolution, supporting investigations, and other actions required by the law and to enforce its User Agreement.

## 9. THIRD-PARTIES

Unless expressed otherwise in this Privacy Policy, this Policy only addresses the use and disclosure of client information provided to and collected by CoinMENA. If the client discloses information to other parties, be it partners of CoinMENA or other third-parties, different privacy rules pertaining to the use and disclosure of information may apply. CoinMENA does not control the privacy policies of third parties and clients will be subjected to such privacy policies where applicable. CoinMENA encourages its clients to review and familiarize themselves with the privacy policies of third-parties.

## 10. DIRECT MARKETING

Subject to applicable laws and regulations, CoinMENA may from time to time send its clients direct marketing materials promoting its products, services or activities using information collected from clients. CoinMENA will provide clients with the opportunity to opt-out of such direct marketing. CoinMENA may from time to time request permission from clients to share their personal information with third-parties. Clients may opt-out of having their personal information shared with third-parties and used for any purpose other than the purpose from which the information was originally collected and obtained with client authorization. If a client chooses to limit the use of their personal information, certain features or services provided by CoinMENA might not be available to the client.

## 11. SECURITY

CoinMENA follows accepted physical and electronic procedures to safeguard and secure clients' personal and non-personal information. CoinMENA uses various security measures such as encryption, firewalls, penetration testing, and access controls to protect clients' information. CoinMENA's servers reside in maximum security vaults under 24/7 surveillance.

Additionally, access to information is restricted to authorized employees and third-parties that need to know the information in order to operate, develop, and improve CoinMENA's Services. No method of transmission over the internet or method of electronic storage is 100% safe and consequently, CoinMENA cannot guarantee its absolute security.

## 12. PRIVACY OF MINORS

CoinMENA does not allow persons under 21 to register for any service, and we do not knowingly collect personal information from any person under the age of 21. If a user is submitting personal information that is suspected of being younger than 21 years of age, CoinMENA will require the user to close his/her account and will not allow the user to continue trading digital assets. We will also take action to delete the account/information as soon as possible. You can get in touch with our support team if you know of any individuals under the age of 21 using our services so we can take action to prevent access to our services.

## 13. COOKIES AND TRACKING

When clients engage with and use CoinMENA's products and services, tiny data files called cookies or other tracking tools (herein, "Cookies") may be placed on your computer or devices. CoinMENA may use cookies

to help identify a client, remember their preferences, better customize services and content for them, and to collect information about their computer or access devices to ensure compliance with AML and other obligations. Clients can reject cookies and still use CoinMENA, but that may restrict their usage of CoinMENA's platform. The use of cookies by CoinMENA's partners and third-parties is not covered by CoinMENA's Privacy Policy.

## 14. DISPUTES AND LEGAL PROCEEDINGS

CoinMENA may need to use clients' personal information to investigate issues and settle disputes with clients in a timely and orderly manner. In the case where an amicable resolution can be reached between CoinMENA and a client, CoinMENA will cooperate with the regulator and other relevant authorities to resolve issues related to the use or disclosure of client information under the laws of the UAE. Any dispute or claim arising out of or relating to CoinMENA's Privacy Policy shall be settled pursuant to the terms of the User Agreement.

## 15. PRIVACY WHEN USING DIGITAL ASSETS

Digital Assets offered by CoinMENA will be recorded on a public blockchain and are not anonymous. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Because blockchains are decentralized networks, CoinMENA is not able to erase, modify or alter personal data from such networks. Through the utilization of third-party forensic and analytical software, others might be able to see the transaction history of any digital asset and collect and use clients' non-personal information.

## 16. CONTACT US

If you have any questions, concerns, or comments about our Privacy Policy, you can get in touch by filling out our Support Form. Please be aware that any unsolicited information or communications you send will not be considered confidential or proprietary and we will not have any obligations with respect to such under this Privacy Policy.