

**Vaultbanc Ltd.**  
**Incorporated in Singapore**  
**Company Registration No. 201728158C**  
**(A member of a business group known as “Vaultbank”)**

**Privacy Policy**

*Last Updated December 8, 2017*

**We Respect the Privacy of Visitors to Vaultbank.io.**

Your (hereinafter “you,” “your,” or “User”) privacy is important to us at Vaultbanc Ltd. We have developed this Privacy Policy to clearly and transparently communicate what information we collect, as well as how we collect, use, share, store and protect that information.

*BY VISITING, ACCESSING, OR USING THE VAULTBANC LTD.’S WEBSITE (VAULTBANK.IO), AND THE ASSOCIATED SERVICES, FEATURES AND CONTENT (HEREINAFTER “THE SERVICES”) YOU SIGNIFY YOUR ACCEPTANCE OF THIS PRIVACY POLICY AND CONSENT TO THE DATA POLICIES AND PRACTICES PRESCRIBED THEREIN.*

Vaultbanc Ltd. proactively encourages each of its Users to engage in privacy best practices. Vaultbanc Ltd. does its best to ensure that everyone that is part of its ecosystem is aware of those practices and has received concrete guidance and/or training concerning implementation. However, this Privacy Policy does not apply to the practices of companies that Vaultbanc Ltd. does not own or control, including any third-party products or services that are integrated with the Services, or to individuals that Vaultbanc Ltd. does not employ or manage.

Please note, Vaultbanc Ltd. does not hold itself to be a bank as defined under the Banking Act of 1933 or any other applicable law or regulation in the United States, Singapore, or any other jurisdiction. Nothing mentioned in this Privacy Policy or any other document issued by Vaultbanc Ltd. shall be construed to mean that Vaultbanc Ltd. is a bank under the Banking Act of 1933 or any other applicable law in the United States, Singapore, or any other jurisdiction.

Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in our Terms of Service. Vaultbanc Ltd. may periodically post changes to this Privacy Policy, and it is the User’s responsibility to review this Privacy Policy frequently and Vaultbanc Ltd. encourages the User to visit this page often.

The following are Vaultbanc Ltd.’s promises to each User:

(1) **Notice.** When Vaultbanc Ltd. collects your personal information, we give you timely and appropriate notice describing what personal information we are collecting, how we will use it and the types of third parties with whom we may share it. This notice is located in this policy.

(2) **Choice.** Vaultbanc Ltd. will give you choices about the ways we use and share your personal information, and we will respect the choices you make.

(3) **Relevance.** Vaultbanc Ltd. will collect only as much personal information as is required to meet the specific, identified purposes of the Services it is effectuating, and we will not use it for other purposes without obtaining your consent.

(4) **Retention.** Vaultbanc Ltd. will keep your personal information only as long as we need it for the purposes for which we collect it, or as permitted by law.

(5) **Accuracy.** Vaultbanc Ltd. will take appropriate steps to make sure your personal information in our records is accurate, as much as is within the power of Vaultbanc Ltd.

(6) **Access.** Vaultbanc Ltd. will provide ways for you to access your personal information as quickly as possible upon request, as required by law, so you can correct inaccuracies. Please use the address below to request access to your information.

(7) **Security.** Vaultbanc Ltd. will take appropriate physical, technical and organizational measures to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration, and destruction. Vaultbanc Ltd. uses the highest industry standards with respect to storage of data and the security of its system.

(8) **Sharing.** Except as described herein, Vaultbanc Ltd. will not share your personal information with third parties without your consent.

(9) **International Transfer.** If Vaultbanc Ltd. is used to transfer your personal information to another country, Vaultbanc Ltd. will take appropriate measures to protect your privacy and the personal information transferred.

(10) **Enforcement.** Vaultbanc Ltd. will regularly review how we are meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices (see immediately below).

To access your information, ask questions about our privacy practices, or issue a complaint, contact us at [contact@vaultbank.io](mailto:contact@vaultbank.io).

To learn more about our Privacy Policy for the Services, please read below.

## **TYPE OF INFORMATION WE COLLECT AND HOW WE COLLECT INFORMATION**

### **Your Identifiable Information.**

Through this Website and the associated Services, we may collect information that can identify you (“Identifiable Information”) when it is voluntarily submitted to us. You may submit

information, such as your email address, through the Website by clicking the subscribe button. When you enter your email address you are voluntarily submitting this information to Vaultbanc Ltd. Additionally, by clicking the “Subscribe” button and entering your email address, you consent to receiving Vaultbanc Ltd.’s newsletter. You also consent to Vaultbanc Ltd. providing your email address to MailChimp, a third-party service provider, in order to send you emails via MailChimp’s services. MailChimp provides marketing automation and allows Vaultbanc Ltd. to create, send and manage Vaultbanc Ltd.’s email newsletters. Please see MailChimp’s Privacy Policy available at <https://mailchimp.com/legal/privacy/> to learn and understand how they collect, store and protect your information.

You can also submit information through the Widget, powered by Orderbook Pte. Ltd., by creating an Account, submitting documentation, depositing Funds, purchasing Vaultbank Tokens, or taking some other explicit action. When you create an Account, you are creating an Account with Orderbook, which you can access through the Vaultbanc Ltd.’s Website or through Orderbook’s website at <https://www.orderbook.io/#/>. Orderbook’s website is a third-party website that has a separate privacy policy and terms of service. Orderbook’s Privacy Policy is available at <https://www.orderbook.io/static/docs/privacy.pdf> while the Terms of Services is available at <https://www.orderbook.io/static/docs/terms.pdf>. The data collection process will be automated via a secure software platform and stored in an encrypted database compliant to applicable data privacy standards. Specifically, your information is initially collected by Orderbook, a third-party provider hired by Vaultbanc Ltd., and then is shared with Vaultbanc Ltd. after all the information is collected. The Identifiable Information Vaultbanc Ltd. receives will be shared with Watiga Trust Pte. Ltd., a third-party agent of Vaultbanc Ltd. This Privacy Policy applies to all means of information submission, including information submitted through the Website or the Widget.

Your Identifiable Information includes:

- Your name;
- Email address;
- Your telephone number;
- Date of birth;
- Current address or principal place of business;
- Identification number, including, but not limited to social security number, tax identification number or passport;
- Government-Issued Identification or other government issued documents proving existence of a legal entity;
- Banking details, such as account numbers, routing numbers, the name of the bank and the bank’s address; and
- Other similar information.

Upon registration, you are prompted for the following information:

- Your name (first and last);
- Your email address;
- Country of residence; and

- A password that you create for login purposes.

If your Country of Residence is not a Restricted Location, as defined in Vaultbanc Ltd.'s Terms of Service, your information will be used to immediately email you an activation link. Upon returning to the Website, you are then asked for your telephone number. Your telephone number will be used to send you a text message with a verification code. This code is then entered on the Website. The phone number authentication is provided to User's through a third-party API owned by SecondFactor, a third-party provider. Your phone number and email address will be shared with SecondFactor for the authentication process and recovery process. When you provide your phone number during the Account creation process, you are agreeing to create an Account with SecondFactor, which will allow your phone number to be authenticated and provide you with a recovery code, should you have any security problems with your Account. Please see SecondFactor's Privacy Policy available at <http://www.secondfactor.io/privacy> to learn about how they collect your information, store your information and protect your information.

By entering all of the above information, you consent to receiving:

- An Account activation link via email at the email address you provided at sign up;
- An SMS verification code via telephone at the telephone number you provided; and
- An email with your encrypted private key.

You further consent to receiving other communications related to your use of the Services and the Widget, powered by Orderbook. After the activation is complete, you will need to provide:

- Your date of birth;
- Your address or principal place of business;
- A government-issued identification number, such as a social security number, tax identification number or passport number; and
- A government-issued identification document evidencing your nationality or residence and bearing a photograph, such as a driver's license or passport, or if you are an entity, other documents proving the existence of a legal entity, such as certified articles of incorporation, a government-issued business license, a partnership agreement, or trust agreement.

The information you provided will be verified using third-party verification providers, including, but not limited to Onfido and Cynopsis Solutions Pte. Ltd. Please review Onfido's Privacy Policy available at <https://onfido.com/privacy>, and Cynopsis Solutions' Privacy Policy available at <https://www.cynopsis-solutions.com/privacy-policy> to learn about how they collect, store and protect your information. Additionally, the Identifiable Information you provide will be shared with Watiga Trust Pte. Ltd, a third-party agent of Vaultbanc Ltd.

### **Your Private Key.**

The Account you create through the Widget, powered by Orderbook, is browser-based. The User's

private key is encrypted as well as decrypted but only in the browser, and the decrypted version is never transferred to the server. None of the exchange operators have any access to your keys or Funds.

Each User Account is implemented via a smart contract and has unique functionalities, including: the ability to replace User key in case of loss; and your Account address never changes.

As part of the signup process, you will receive an email with a copy of your encrypted private key. If you are in need of restoring your key, the instructions for decrypting a copy of the private key are available at [https://github.com/Ambisafe/private\\_key\\_recovery\\_service](https://github.com/Ambisafe/private_key_recovery_service). Please maintain this information and other related information as securely as possible.

### **Usage Information.**

Vaultbanc Ltd. and Orderbook may also collect certain types of usage information when you visit our Website and use the Widget, such as information about your device and its software, including, but not limited to the User's:

- IP Address;
- Browser Type;
- Internet service provider;
- Platform type;
- Device identifier;
- Device type and manufacturer;
- Operating system;
- Browser settings;
- Language preference;
- Browser version;
- Location information;
- Other device settings;
- Previous webpage visited;
- Length of visit and usage;
- Navigate of Website;
- Number of clicks;
- Frequency of clicks and visits;
- Date and time stamps of activity on the Website or Widget; and
- Any other technological usage information.

Additionally, when you use the Services, Vaultbanc Ltd. or Orderbook may collect information about your Transaction and/or other activities on our Website for fraud prevention purposes, to monitor for possible breaches of the User's Account, and to identify any malicious software or other activity that may harm Vaultbanc Ltd., our third-party providers or other Users. The number of ICO Tokens you purchase will be collected and will be provided to Vaultbanc Ltd. Data about

your use of our Website or Services may be collected, from which personal information has been removed.

We or our third-party partners may also use cookies, web beacons, or other technologies to collect and store other information about your visit to, or use of the Services, including, but not limited to, your duration or specific links you click on. We may later associate the usage and other information we collect online with personal information about you.

Further, any information a User discloses to Vaultbanc Ltd. or a third-party provider's Support team, such as Orderbook Support, may be collected. If you encounter a crash or error while using our Services, a crash report may be generated that includes, technical usage, and if you are logged in, your Account information so that we can diagnose and potentially prevent the problem in the future. Third-party tools are used to collect this information.

We or our third-party providers may ask your permission before collecting certain information, such as precise geo-location information.

#### **Accredited Investor Information.**

In order for a User to purchase Securities Offerings, the User will need to be verified as an Accredited Investor. For the United States Accredited Investor verification process, a User's Identifiable Information may also include income-based information, net worth based information, or information from a third-party representative. If the User is an Accredited Investor based on income then the User's Identifiable Information will also include:

- The User's W-2 Form, Form 1099, Schedule K-1, or Filed Form 1040; and
- A written representation from the User that he or she has a reasonable expectation of reaching the income level in the current year.

If the User is an Accredited Investor based on net worth then the User's Identifiable Information will also include:

- Bank statements;
- Brokerage statements; and
- Other statements of securities holdings, certificates of deposit and/or tax assessments and appraisal reports issued by third parties in order to verify assets.

However, if the User is an Accredited Investor based on third-party representation, then the User's Identifiable Information will also include:

- Written confirmation from a broker-dealer, a registered investment advisor, a licensed attorney or a CPA that such person has taken reasonable steps to verify that the User is an accredited investor within the prior three (3) months and determined that such User is an accredited investor.

Additionally, any other relevant documents that a User provides to prove Accredited Investor status will be included in the User's Identifiable Information.

If the User is from Singapore, the User must provide documentation showing that they meet one of the following requirements:

- Is an individual with net personal assets exceeding two million (\$2,000,000) SGD in value;
- Is an individual whose income in the preceding twelve (12) months is not less than three hundred thousand (\$300,000) SGD; or
- Is an entity with net assets exceeding ten million (\$10,000,000) SGD in value certified by the User's most recently audited balance-sheet or a balance-sheet certified by the User as a true and fair view of the state of affairs of the User as of the date of the balance-sheet, which should be dated within the preceding twelve (12) months.

To prove that the User meets the Singapore Accredited Investor requirement, the User shall provide bank statements, securities statements, income statements, or other financial documents evidencing the necessary requirement. All the information the User submits to show they meet the Singapore requirement will be included in the User's Identifiable Information that is collected and retained.

If the User is not from the United States or Singapore, the User may still need to qualify as an Accredited Investor based on their country of residence, including, but not limited to, Australia, New Zealand, Gibraltar, Switzerland, European Union/United Kingdom, Hong Kong, Israel, Canada, and Japan. Please review the list of countries, available at <https://orderbook.atlassian.net/wiki/spaces/OVR/pages/10027009/Countries+that+require+accredited+investor+status+verification+to+buy+securities>. The list is not exhaustive and is subject to change, therefore, please consult with your local counsel to ensure you are compliant with the standards in your jurisdiction. If the User is required to show that they meet an Accredited Investor standard, then the User's Identifiable Information will also include any documentation or information that the User provides during the verification process. It is the User's responsibility to understand and comply with any and all laws, rules and regulations of his/her specific jurisdiction that may be applicable to the User's use of the Services or the Website.

### **Foreign Account Tax Compliance Act and Common Reporting Standards (FATCA/CRS).**

In order to comply with the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standards (CRS), Users will need to provide the information that Vaultbanc Ltd. is required to collect. The information required by these forms is considered Identifiable Information, and may include the Identifiable Information mentioned above, such as the "Know Your Customer" (KYC), Anti-Money Laundering (AML), and Accreditation information; as well as other Identifiable Information, including, but not limited to, foreign tax identifying number, global intermediary identification number, entity type if applicable, government-issued documentation if applicable and/or other relevant financial documentation if necessary.

## **Non-Identifiable Information.**

Other non-identifiable information may also be automatically collected in connection with your visit to this Website. (“Non-Identifiable Information”).

## **HOW WE USE COOKIES**

Vaultbanc Ltd., or our service providers and other companies we work with, may deploy and use cookies, web beacons, local shared objects and other tracking technologies to track your use of the Website and the Services, or for various other purposes, such as fraud prevention and monitoring, as well as advertising and marketing performance. These tools may detect characteristics or settings of the specific device you use to access the Website or Services. Additionally, information such as the types of Services used and the number of Users the Website or Services receive daily may be collected. The servers automatically log information about your computer, but this information is not used to identify you personally.

Cookies are small amounts of data a website can send to a visitor’s web browser. They function as your computer’s identification card and enables Vaultbanc Ltd. to improve your experience by securely maintaining your authenticated session and preferences. Cookies may also enable us or our service providers and other companies we work with to relate your use of the Services over time to customize your experience.

A web beacon embeds a small transparent gif image in a webpage or email, and is used to help recognize Users, identify when Users access the webpage or view the email, assess traffic patterns and measure website engagement. Local shared objects may be stored on your hard drive using a media player or other software installed on your device. Local shared objects are similar to cookies in terms of their option, but may not be managed in your browser the same way and may not function as an identification card nor store any data on your device.

Most Internet browsers are set up to accept cookies automatically. You can set your browser to notify you when you receive a cookie, allowing you to decide whether or not to accept it. For some web pages requiring an authorization, cookies are not optional. Users choosing not to accept cookies or similar devices may not be able to access those webpages or the Services.

## **HOW WE USE THE INFORMATION WE COLLECT**

The primary purpose in collecting the information is to provide you with a secure and efficient experience. The information may be used for the following purposes:

- Allow Users to create and operate an Account;
- Verify a User’s identity;
- Provide the Services;

- Process Transactions and send notices about your Transactions;
- Resolve disputes, collect fees, and troubleshoot problems;
- Prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted Terms of Service;
- Generate statistics about how the Services are being used;
- Perform analytics concerning your use of the Services;
- Target advertising and communications;
- Deliver targeted marketing and promotional offers; and
- To meet any legal or regulatory requirements.

If you submit your email address through the Website's subscribe button, then that information will be used to send you Vaultbanc Ltd. newsletters. We may also use data that we collect on an anonymous basis, such that it does not identify any individual customer, for various business purposes, where permissible under applicable laws and regulations. Such data is used to help us understand consumer trends, needs, interests, and preferences so we can improve our Services.

### **Interacting With You.**

Your Identifiable Information will be used to communicate with you, manage your Account, respond to requests or complaints you may submit and for the sole purpose of your participation at the Website and use of the Widget.

### **Making Our Platform Better.**

From time to time, your Identifiable Information may be referenced to better understand your needs and how the Services can be improved or developed. Non-Identifiable Information may also be referenced to analyze the performance of, and make improvements to, the Website and Widget. Your Identifiable Information will not be sold to any third parties.

## **WHEN WE DISCLOSE YOUR INFORMATION TO OTHERS**

Except to the extent required by applicable law or governmental or judicial body, Vaultbanc Ltd. will not disclose your Identifiable Information to any third-party other than to a regulator, our affiliates, a third-party service provider, a third-party verification provider, a partner, a vendor, an affiliated third-party, or representative to whom we are required to disclose such information to in order for them to assist us in providing our Services to you.

To achieve the purposes described herein, Vaultbanc Ltd. employs the services of individuals and companies, such as those described above, to perform tasks on our behalf. Our agents and those individuals and companies noted above, do not have any right to use your Identifiable Information we share with them beyond what we authorize or beyond what is necessary to assist us in providing the Services to you as described in this Privacy Policy. Any third-party which receives or has access to your Identifiable Information shall be required by us to protect such information.

Specifically, Vaultbanc Ltd. employs Orderbook to provide the Widget and associated Services, as well as, to collect all the information during the Account creation process. Additionally, your email address may be disclosed to third-party providers that perform marketing services on our behalf or on the behalf of our third-party providers. Third-party providers may be used to perform Anti-Money Laundering checks and to perform verification procedures, also known as “Know Your Customer,” in order to comply with KYC and AML Requirements. The FATCA/CRS information the User provides may also be disclosed to third-party providers in order to have the information verified. All of the Identifiable Information you provide during the Account registration process will be shared with Vaultbanc Ltd.’s third-party agent, Watiga Trust Pte. Ltd.

Your Identifiable Information may be shared to comply with requests by law enforcement or governmental authorities or where we have any other legal obligation to disclose the information sought. Your information may be disclosed or transferred as part of, or during negotiations of, a merger, consolidation, sale of our assets, as well as equity financing, acquisition, strategic alliance or in any other situations where such information may be transferred as one of the business assets of Vaultbanc Ltd.

We may also release Identifiable Information when we believe in good faith that release is necessary to enforce or apply our conditions of use and other agreements, or protect the rights, property, or safety of Vaultbanc Ltd., our employees, our Users, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Due to the nature of the blockchain network, all transactions are publicly auditable. The data that is published in the blockchain network is defined by the specification of the consensus algorithm of that network and does not depend on management decisions of Vaultbanc Ltd. or our third-party providers. Additionally, when a User’s Account address is disclosed, the User’s Account balance and transaction history will be viewable by the person who the address was disclosed to. However, the User’s name or other Identifiable Information will not be publicly available. Therefore, it is important that you protect the address to your Account.

Your information may also be shared or disclosed with your consent or under your direction to do so.

## **MARKETING AND PROMOTIONAL COMMUNICATION**

If you wish to receive targeted and relevant promotional communication, you have the option to “opt-in” to this service when creating an Account through the Widget, which is powered by Orderbook. If you change your mind and wish to stop receiving any such communication, you may opt out of receiving promotional communication by following the instructions in those communications.

The email address collected during the Account creation process may also be shared with third-party providers to perform marketing services and display ads that may be relevant to your interests. However, you have the right to ask that your information not be processed for marketing purposes. You can exercise this right and limit this by choosing the “opt-out” option in your Account, checking the relevant box during the Account creation process or contacting Orderbook Support at [support@orderbook.io](mailto:support@orderbook.io).

Additionally, by clicking the subscribe button on Vaultbanc Ltd.’s Website and submitting your email address to Vaultbanc Ltd., you consent to receiving Vaultbanc Ltd.’s newsletters. If you change your mind and no longer want to receive Vaultbanc Ltd. newsletters, you may unsubscribe by following the instructions at the bottom of the email.

## **HOW WE STORE AND PROTECT INFORMATION WE COLLECT**

Vaultbanc Ltd. will take reasonable precautions, as well as physical, technical, and organizational measures in accordance with industry standards, as described herein, to protect your Identifiable Information from loss, misuse, unauthorized access, disclosure, alteration, or destruction. Information you provide is transmitted to and stored by Orderbook using industry-standard methods for each type of information, and will be shared with Vaultbanc Ltd.

The Services are maintained in the United States of America and all servers, which store your Identifiable Information, are secured and located in the United States of America. Computer safeguards, such as firewalls and data encryption are used to protect your information. We authorize access to your information only for those employees or agents who require it to fulfill their job responsibilities and these individuals are required to treat this information as confidential.

However, the security of information on or transmitted via the Internet cannot be guaranteed. Unauthorized entry of use, hardware or software failures, and other factors may compromise the security of your Identifiable Information. All information you send to us electronically or through email is not secure. Any transmission is at your own risk as the transmission of information via the Internet is not completely secure. Users are solely responsible for protecting their passwords, limiting access to their computers, and signing out of the Account and Widget after their sessions.

Although Vaultbanc Ltd. has Users from all over the world, by accessing the Services, the User consents to and authorizes the export of their Identifiable Information to the United States and its storage and use as specified in the Privacy Policy.

Your information will be retained for as long as your Account is active or is needed to provide you the Services, having regard to the purposes described in the Privacy Policy and the legal and regulatory requirements. The Accounts and Identifiable Information will be retained for, at least a period of five years after they are closed by Users or as necessary to comply with the legal obligations or to resolve disputes.

The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

### **LINKS TO OTHER WEBSITES**

The Vaultbanc Ltd. Website and Services may contain links to other third-party websites not operated or controlled by Vaultbanc Ltd. This Privacy Policy only applies to the Vaultbanc Ltd. Website and Services. Vaultbanc Ltd. is not responsible for the content, accuracy, or opinions expressed in other websites. Vaultbanc Ltd. is not responsible for the privacy policies and/or practices of third parties. Please note that when you use a link to go from the Vaultbanc Ltd. Website to another website, our Privacy Policy is no longer in effect. Vaultbanc Ltd. encourages you to review all policies, rules, terms and regulations, including the privacy policy, of each website that you visit.

### **HOW TO ACCESS, UPDATE & DELETE YOUR INFORMATION**

The User has the right to review, correct, update, or amend the Identifiable Information where it is inaccurate, and the User may do so at any time by logging into their Account or by sending a request to Orderbook at [privacy@orderbook.io](mailto:privacy@orderbook.io), as Orderbook provides the Widget and the Services. The User is also entitled to request the deletion or destruction of both the Account and Identifiable Information by sending a request to [privacy@orderbook.io](mailto:privacy@orderbook.io). Additionally, you may request a copy of the information we have collected about you by contacting us with your full name and email address. Please send all requests to [contact@vaultbank.io](mailto:contact@vaultbank.io).

If you do not wish to have your Identifiable Information used or shared as described in this document, please discontinue the use of the Services or do not provide such information. While we strive to honor all reasonable requests, please be aware that we backup the data to prevent accidental or malicious destruction of your information. Information on backup servers may take some time to be completely deleted from the system. If you request that we remove you from our system and delete your Account, please note that you may still receive materials while your request is being processed.

If you request that your Account be deleted, we will keep your Account information for a period of time in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their Account and opening a new Account. However, if you delete your Account, your Identifiable Information will not be used by Vaultbanc Ltd. or our third-party providers for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, as required by law, or in accordance with this Privacy Policy.

### **NOTICE CONCERNING CHILDREN'S INFORMATION**

Vaultbanc Ltd. does not direct any of its business practices or system outputs directly or indirectly towards children. We do not target our Services towards children, nor do we knowingly collect information about children. We are committed to respecting the privacy of children online and ensuring that Vaultbanc Ltd. is compliant with the Children's Online Privacy Protection Act (COPPA). If Vaultbanc Ltd. learns that the information of a child under the age of 13 is stored within its system, Vaultbanc Ltd. will promptly delete any information in that User's Account or any other profile information that Vaultbanc Ltd. has been used for. If you become aware that a child under the age of 13 has provided us with personal information, please notify us immediately at [contact@vaultbank.io](mailto:contact@vaultbank.io) and we will terminate the Account.

### **UPDATES TO THIS POLICY**

We reserve the right to change, modify, update, add, or remove portions of this Privacy Policy at any time. Any changes or updates will be effective immediately upon posting to this page. When we do update it, for your convenience, we will make the updated policy available on this page. If you opt out of receiving communications, you may not receive certain notifications, however, they will still govern your use of the Services, and you are responsible for proactively checking for any changes. Vaultbanc Ltd. encourages all Users to check this Website Privacy Policy frequently to stay up to date on any changes. You can determine if changes have been made by checking the effective date on the Privacy Policy. Continued use of the Website after the effective date of any change in this Privacy Policy will constitute acceptance of such changes and it will signify that you agree to abide by and be bound by the modified Privacy Policy.

### **CONTACT VAULTBANC LTD.**

If you have questions, comments, or concerns regarding this Privacy Policy, please contact us at the following email address [contact@vaultbank.io](mailto:contact@vaultbank.io).

Please include the following information in your request:

- 1) Your Name;
- 2) Your contact information, including phone number, mailing address, and email address;  
and
- 3) The precise nature of your request, inquiry, or complaint.

## **VAULTBANC LTD.'S POLICY FOR DATA TRANSFER FROM THE EUROPEAN UNION**

Some of our Users' use of the Vaultbanc Ltd. system may require a cross-border transfer of personal information. Vaultbanc Ltd. is already committed to adhering to the principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability in accordance with the requirements of the laws of the European Union.

### **Definitions**

"Personal Information" or "Information" means any information or set of information that (1) is transferred from the EU to another country; (2) is recorded in any form or medium; (3) is about, or pertains to a specific individual; and (4) that identifies, or can be used to identify, a specific individual.

"Sensitive Personal Information" means Personal Information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information that concerns health or sex life. In this privacy policy, all references to Personal Information include Sensitive Personal Information.

### **Principles**

**Notice.** Vaultbanc Ltd. shall inform an individual of the purpose for which it collects and uses the Personal Information and the types of third parties to which Vaultbanc Ltd. discloses or may disclose that Information. Vaultbanc Ltd. shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Vaultbanc Ltd., or as soon as practicable thereafter, and in any event before Vaultbanc Ltd. uses or discloses the Information for a purpose other than for which it was originally collected. Such notice may be disseminated, for example, through the provision of this Privacy Policy.

The types of Personal Information that may be collected in order to provide Services to the Users include, but are not limited to, the first and last names, email address, date of birth, current address or principal place of business, passwords created at registration and phone numbers.

We collect Personal Information for various purposes, which include, but are not limited to, your specific use of the Vaultbanc Ltd. Website and Services.

**Choice.** Vaultbanc Ltd. will offer individuals the opportunity to choose (opt in or out) of whether their Personal Information is (1) to be disclosed to a third-party, or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. We will comply with the requirements of the laws of the European Union with respect to disclosures of Sensitive Personal Information, including, when applicable, obtaining the explicit consent (i.e., opt in consent) of the individual prior to disclosing sensitive information to a third-party or using Sensitive Personal Information for purposes other than those for which it was

originally collected or subsequently authorized by the individual. Vaultbanc Ltd. shall treat Sensitive Personal Information received from an individual the same as the individual would treat and identify it as Sensitive Personal Information.

Please contact Vaultbanc Ltd. for further details.

***Accountability for Onward Transfers to Third Parties.*** Vaultbanc Ltd. is potentially liable in cases of onward transfers of Personal Information to third parties. Prior to disclosing Personal Information to a third-party, Vaultbanc Ltd. shall notify the individual of such disclosure and allow the individual the choice (opt-out) of such disclosure. As stated above, prior to disclosing Sensitive Personal Information to a third-party, Vaultbanc Ltd., in most instances, will obtain the individual's affirmative express (opt in) consent. Vaultbanc Ltd. shall ensure that any third-party to which Personal Information may be disclosed subscribes to the Principles or are subject to law and/or agreements providing the same level of privacy protection as is required by the Principles, and agree in writing to provide an adequate level of privacy protection. We may transfer Personal Information to third-party agents, or service providers, who perform functions on our behalf. We enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection that the laws of the European Union require and limiting their use of the data to the specified services provided on our behalf.

At this time, we do not transfer Personal Information to unaffiliated third parties acting as data controllers. If we choose to begin transferring your Personal Information to such third parties, we will notify you by updating this Privacy Policy.

In some rare cases, it may be necessary to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

***Data Security.*** Vaultbanc Ltd. shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Vaultbanc Ltd. has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Vaultbanc Ltd. has a continued commitment to create and maintain the most stringent controls needed to ensure the highest quality and security of Services provided to its Users. Vaultbanc Ltd. cannot guarantee the security of Information on or transmitted via the Internet.

***Data Integrity.*** Vaultbanc Ltd. shall only process Personal Information in a way that is compatible with and relevant to the purposes for which it was collected or authorized by the individual. To the extent necessary for this purpose, Vaultbanc Ltd. shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

***Access.*** An individual has the right to obtain Vaultbanc Ltd.'s confirmation as to whether we maintain Personal Information relating to you. Upon request, Vaultbanc Ltd. shall allow an individual access to his or her Personal Information and allow the individual to correct, amend or delete inaccurate information. An individual's right to access Personal Information may be restricted in exceptional circumstances, including, but not limited to, when the burden or expense

of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual may be violated. If Vaultbanc Ltd. determines that an individual's access should be restricted in a particular instance, Vaultbanc Ltd. will provide the individual with an explanation of the determination and respond to any inquiries the individual may have.

To request to access, correct, or amend Personal Information, an individual may contact Vaultbanc Ltd.'s Privacy Compliance at the contact information provided below.

***Recourse, Enforcement, and Liability.*** Vaultbanc Ltd. uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the requirements of the laws of the European Union. We encourage interested persons to raise any concerns or complaints using the contact information provided below, and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the European Data Protection Authorities (EU DPAs) as an independent recourse mechanism. Vaultbanc Ltd. will cooperate with the DPAs in the investigation and resolution of complaints brought by you. Vaultbanc Ltd. agrees to comply with any advice given by the DPAs where the DPAs take the view that the organization needs to take specific action.

## **Amendments**

This Privacy Policy may be amended from time to time consistent with the requirements of the laws of the European Union. Vaultbanc Ltd. will provide notification of such changes through the Vaultbank.io Website.

## **Contact Information for Vaultbanc Ltd.'s Privacy Compliance**

To request to access, modify, or delete Personal Information, inquire about this Privacy Policy, or file a privacy complaint, please send an email to [contact@vaultbank.io](mailto:contact@vaultbank.io).

Please include the following information in your request:

- 1) Your Name;
- 2) Your contact information, including phone number, mailing address, and email address;  
and
- 3) The precise nature of your request, inquiry, or complaint.

## **General Amendments and Updates to this Privacy Policy**

This Privacy Policy may be amended from time to time consistent with applicable laws. Vaultbanc Ltd. will provide notification of changes to this Privacy Policy through the Vaultbank.io Website.

Please note, Vaultbanc Ltd. does not hold itself to be a bank as defined under the Banking Act of 1933 or any other applicable law or regulation in the United States, Singapore, or any other jurisdiction. Nothing mentioned in this Privacy Policy or any other document issued by Vaultbanc Ltd. shall be construed to mean that Vaultbanc Ltd. is a bank under the Banking Act of 1933 or any other applicable law in the United States, Singapore, or any other jurisdiction.