

PRIVACY AND COOKIES POLICY

Paera UAB ("Paera", "us", "we", or "our"), a company incorporated and registered in Lithuania with company number 306695227 and registered office at Vilnius, Žalgirio g. 88-101, LT-09303, providing crypto-asset services. ("Services").

This Privacy Policy (the "Privacy Policy") is applicable between you as a user of our Services ("you", "User") and us as an operator of the Services. This Privacy Policy applies to the use of any Personal Data we collect or that you provide to us in connection with your use of the Service.

The purpose of this Privacy Policy is to inform you how your Personal Data is collected, processed, used, and disclosed when you use our Services.

We can assure you that we comply with the European General Data Protection Regulation ("GDPR") and any other applicable laws and regulations and that we process your personal data lawfully, fairly and transparently.

We use your data to provide and improve our Services. By using the Services, you agree to the collection and use of Personal Data in accordance with this Privacy Policy.

1. DEFINITIONS

"Partner Service" means a service or feature offered by a third-party partner directly to users of the Services.

"Personal Data" means all information making you directly or indirectly identifiable (e.g. your name, first name, address, phone number or email address but also the IP address of your computer).

"Device Information" means Personal Data collected automatically, either generated by the use of the Services or from the Services' infrastructure itself.

"Data Controller" means the natural or legal person determines the purposes for which and the manner in which any personal information are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

"Data Processor" means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Partner Service in order to process your data more effectively as stated in this Privacy Policy.

2. RESPONSIBLE PERSON / REPRESENTATIVE IN THE EU

The Responsible Person for the Personal Data collected is Kestutis Budreika ("Responsible Person"). For any matters relating to data protection, you may contact Responsible Person by letter to the following address:

Paera UAB, Vilnius, Žalgirio g. 88-101, LT-09303.

The representative in the EU according to article 27 of GDPR is: Kestutis Budreika.

3. DATA WE COLLECT

We collect several different types of Personal Data for various purposes described in this Privacy Policy.

4. PERSONAL DATA YOU PROVIDE US

During provision of Services Paera may collect the following information:

- name
- email address
- phone number

When you make a purchase or attempt to make a purchase through our Services, a Partner Service may ask you to provide Personal Data including, but not limited to, the following:

- name;
- email address;
- phone number;
- identity document;

- username and password used for the Services;
- real time photo of the customer (selfie);
- utility bill;
- any other information you provide to us.

If provided, your email address may be used to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us.

5. PERSONAL DATA COLLECTED AUTOMATICALLY LIKE DEVICE INFORMATION / COOKIES / GOOGLE ANALYTICS

When you access the Services by or through a mobile device, we may automatically collect information such as the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers and other diagnostic data.

Additionally, we collect information about the individual web pages or products that you view, what sites or search terms referred you to the Services, and information about how you interact with the Services. We refer to this type of data as "Tracking Cookies Data".

We collect Device Information and Tracking Cookies Data using the following technologies:

- **"Cookies"**. Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from the mobile application and stored on your device. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>.

Two types of cookies may be used - "session cookies" and "persistent cookies". Session cookies are temporary cookies that remain on your device until you leave the Services. A persistent cookie remains on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings).

We collect "Necessary Cookies" and "Performance Cookies" which do not identify you as an individual.

If you do not agree to our use of Cookies, you should set your browser settings accordingly or not use our Services. By continuing to use our Services without changing your settings, you are agreeing to our use of Cookies and the terms with regard to Cookies of this Privacy Policy. You can manage your cookie preferences by adjusting your browser settings or using our cookie consent management tool. You can withdraw your consent for non-essential cookies at any time without affecting the functionality of our core services.

- **"Log files"**. Log files track actions occurring in the Services, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- **"Web beacons", "tags", and "pixels"** are electronic files used to record information about how you browse the Services.
- **"Google Analytics"**. Google Analytics is a web analytics service offered by Google Inc. that tracks and reports website traffic (such as navigation path, length of stay, returning or new user, end device). Google uses the data collected to track and monitor the use of our Services. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. We do not use the information and personal data collected by Google Analytics to identify individuals unless we become aware of specific indications of illegal use. For more information on the privacy practices of Google, please visit the [Google Privacy Terms](http://www.google.com/intl/en/policies/privacy/) web page: <http://www.google.com/intl/en/policies/privacy/>.

We also encourage you to review the Google's [policy](https://support.google.com/analytics/answer/6004245) for safeguarding your data: <https://support.google.com/analytics/answer/6004245>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>. By continuing to use our Services without opting out to Google Analytics, you are agreeing to the collection of data by Google Analytics.

- **"Firebase"**. Firebase is analytics service for mobile applications, provided by Google Inc. You may opt-out of certain Firebase features by following the instructions provided by Google in their Privacy Policy: <http://www.google.com/intl/en/policies/privacy/>. For more information on what type of information Firebase collects, please visit the Google Privacy Terms web page: <http://www.google.com/intl/en/policies/privacy/>.

6. PURPOSE OF THE COLLECTION OF PERSONAL DATA

Paera uses the Personal Data you provided to us for the following purposes:

- To provide the Services;
- To allow you to participate in interactive features of our Services when you choose to do so;
- To provide customer support;
- To process transaction history;
- To provide you with news, special offers and general information about other services which we offer that are similar to those that you have already used unless you have opted not to receive such information.

Paera uses the Personal Data collected automatically like Device Information and Tracking Cookies Data for the following purposes:

- To enable the use of our Services;
- To gather analysis or valuable information so that we can improve our Services and offer you more enjoyable and efficient experience;
- To monitor the usage of our Services;
- To detect, prevent and address technical issues;
- For internal statistical purposes.

7. LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

Paera's legal basis according to the GDPR for collecting and using the personal Data described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Paera may process your Personal Data because:

- We need to perform a contract with you (fulfillment of an agreement in accordance with Art. 6 Par. 1 lit. b of GDPR),
- You have given us permission to do so (consent in accordance with Art. 6 Par. 1 lit. a of GDPR),
- The processing is in our legitimate interests and is not overridden by your rights (legitimate interest in the processing of Data in the sense of Art. 6 Par. 1 lit. f. of GDPR),
- It is required to comply with a legal obligation (Art. 6 Par. 1 lit. c of GDPR).

8. RETENTION OF DATA

The retention period of Personal Data processed by Paera may vary depending on common practice, and considered in accordance with the legal obligations and the applicable limitation rules. In any way, Paera will process and store the Personal Data only for the period necessary to achieve the purpose of storage or as far as this is granted by the applicable laws or regulations.

If the storage purpose is not applicable anymore, or if the storage period prescribed by the applicable laws and regulations expires, the Personal Data is routinely erased in accordance with legal requirements.

9. TRANSFER OF DATA

Your data, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. If your data is transferred outside the EU, we ensure that such transfers are compliant with GDPR using Standard Contractual Clauses (SCCs) or other lawful mechanisms.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Paera will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

10. DATA DISCLOSURE

We do not sell, lease, rent, or otherwise disclose your Personal Data to third parties except to the Service providers, who are contractually bound to confidentiality. When we do so we take steps to ensure they meet our data security standards, so that your Personal Data remains secure.

Paera may further disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of Paera;
- To prevent or investigate possible wrongdoing in connection with the Services;
- To protect the personal safety of users of the Services or the public;
- To protect against legal liability.

We transmit your Personal Data only to such our employees who are authorized to process them as part of their duties.

All Personal Data used by these third parties is solely used for the purposes of the Services provided at your request. Any use for other purposes is strictly prohibited. In addition, any Personal Data processed by third parties will be in accordance with the terms of this Privacy Policy and in compliance with the GDPR and any other applicable laws and regulations. The third-party providers we use will only collect and use your information to the extent necessary to enable them to perform the Services they provide to us.

If the level of data protection in a country where a service provider is located does not correspond to the European data protection level, we contractually ensure that the protection of your personal data corresponds to that in the EU at all times by concluding agreements using the standard contractual clauses complying with the GDPR.

11. SECURITY OF DATA

The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we guarantee to use commercially acceptable means to protect your Personal Data in accordance with the GDPR and other applicable laws and regulations, we cannot guarantee the absolute security and accept no liability of the transmission of your Personal Data through our Services.

We also periodically review and adjust security safeguards as the threat landscape evolves. Ultimately no security system is impenetrable, and we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, our policy is to take reasonable steps to investigate the situation and, where appropriate, communicate with affected individuals.

In the event of a data breach that affects your personal data, we will notify you and relevant data protection authorities within 72 hours, as required under GDPR. We will also take necessary measures to mitigate any risks arising from such an incident.

12. SERVICE PROVIDERS

We may engage the below mentioned Partner Service providers to facilitate our Services, to provide the Services on our behalf, to perform Services' related services or to assist us in analyzing how our Service is used.

These Partner Services have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

We cooperate with the following Partner Service providers:

| Partner's name | Function | Privacy policy |
|-------------------------|---|----------------------|
| Tangem AG | Main interface for the Services provision | Link |
| UAB Holyheld Financial | Liquidity and KYT provider | Link |
| UAB Lunu Europe | Liquidity and KYT provider | Link |
| Sum and Substance Ltd. | AML, KYC, document checks | Link |
| Crystal Blockchain B.V. | KYT Provider | Link |
| Google Inc. | Analytics | Link |

As described above, we use your Personal Data to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>. You can opt out of targeted advertising by using the link below:

- Google: <https://www.google.com/settings/ads/anonymous>

By continuing to use our Services without opting out as described above, you are agreeing to the collection of data by the mentioned Partner Service providers. We will only send you marketing communications if you have explicitly opted in. You can opt out at any time by clicking the 'unsubscribe' link in our emails or adjusting your notification settings in your account.

13. YOUR DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION (GDPR)

Depending on your jurisdiction you may have certain data protection rights. Paera aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data to the extent permitted by law.

If you wish to be informed what Personal Data, we hold about you and if you want it to be removed from our systems, please contact us as stated in this Privacy Policy.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. If you would like to exercise this right, please contact us through the contact information below. However, some data (such as transaction records and KYC data) may be retained for up to 6 years to comply with legal and regulatory obligations.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your Personal Data.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Paera relied on your consent to process your Personal Data. Please note that we may ask you to verify your identity before responding to such requests.
- You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data.

To use these data protection rights please contact us as stated herein.

14. MINORS

You must be at least eighteen (18) years of age to register with and use the Services. This Service is not directed to children under 18. We do not intend to collect Personal Data from children under 18.

15. CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at dpo@paera.com or by mail using the details provided below:

Paera UAB

Re: Privacy Compliance

Žalgirio g. 88-101, LT-09303, Vilnius, Lithuania

16. CHANGES TO THE PRIVACY POLICY

From time to time, we may change this Privacy Policy in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. You can tell when changes have been made to the Privacy Policy by referring to the "Last Updated" CLAUSE. If we materially change the ways in which we use and disclose personal data, we will post a notice in the Services and send an email to our registered users. Your continued use of the Services following any changes to this Privacy Policy constitutes your acceptance of any such changes made.

LAST UPDATED: [01/03/2025]