INTRODUCTION

Welcome to Centauri Pay LLC (Centauri) Privacy Notice (this "**Notice**").

Centauri Pay LLC is a private limited liability company with its registered address at 101 Hudson Street, Jersey City, New Jersey 07302 ("**Centauri**", "**we**"; "**us**"; "**our**") respects your privacy and is committed to protecting your personal information or, as otherwise termed, your "**personal data**". In that regard, Centauri has launched and offers clients (subject to prior account registration) an online platform in respect of virtual financial assets and related digital wallet services (the "**Platform**") and/or related custody services (collectively, the "**Services**") which are all accessible via our website coinpayments.net (the "**Site**").

The purpose of this Notice is to set out the basis on which we will process your personal data when you:

- visit and use the Site and/or the Platform (regardless of where you visit or use them from);
- apply for and open an account with us (your "**Account**"); and
- apply for, receive, or use any of the Services that we offer via our Site.

This includes any data that you may provide for and in relation to our newsletters, updates, events and other marketing and promotional communications. This Notice also informs you about: (1) who is responsible for looking after your personal data (2) what personal data we process (3) what we use your personal data for and how we will handle your personal data,(4) who we share your personal data with (5) our obligations in regard to processing your personal data responsibly and securely, (5) how long we keep your personal data and (6) your data protection rights as a data subject.It should be read in conjunction with our **IP Address and Cookie Policy** which is available at https://www.coinpayments.net/. We may change this Privacy Notice from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website or sending you a notification). We encourage you to review the Privacy Notice whenever you access the Services or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

This Notice is provided in a layered format so you can click through to the specific areas set out below.

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IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Notice

We process your personal data in an appropriate and lawful manner, in accordance with the Applicable Laws as may be amended from time to time. This Notice aims to give information on how Centauri collects and processes your personal data in the scenarios outlined above in the '**Introduction**' (namely, through your use of the **Site**, the **Platform** and our related **Services**, including any data that you may provide to us or which we may receive).

It is important that you read this Notice together with any other privacy notice or policy which we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Notice supplements the other notices and is not intended to override them. As a customer, you are responsible for complying with US biometric privacy laws and other applicable privacy laws, including any consent or notification requirements under Applicable Law.

1. DEFINITIONS

Set out below are key definitions of certain data protection terms which appear in this Notice:

"**Consent Form**" refers to separate documents which we might from time to time provide you where we ask for your explicit consent for any processing which is not for purposes set out in this Notice.

"**Data subjects**" means living individuals (i.e. **natural persons**) about whom we collect and process personal data.

"**Data controller**" or "**controller**" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

"**Data processor**" or "**processor**" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

"**Personal data**" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

"**Processing**" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;.

"**Sensitive personal data**", "**sensitive data**" or "**special categories of personal data**" includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offense committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. This type of sensitive data can only be processed under strict conditions.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified (as stated above). It does not include data where the identity has been removed (**anonymous data**). In the course of your relationship with us (including during the account opening stage), we may collect, use, store and transfer different kinds of personal data about you which we have grouped together. For avoidance of doubt, categories marked in blue are applicable to customers (i.e. individuals who hold a registered customer account with us).

- **Identity Data** includes your first name, maiden name (where applicable), last name, address, username or similar identifier, marital status, title, nationality, date of birth and gender, identity card and/or passport number. This will form part of your account information on the Site.
- **Contact Data** includes your billing address, email address and contact number (telephone and/or mobile).
- **Financial Data** includes your digital wallet address, private key, bank account and payment details.
- **Transaction Data** includes details about:
    - the type of cryptocurrencies involved, the order volume, price, value and, where applicable, the proceeds derived;
    - open orders which you may have which are available for matching with other users of the Platform;
    - your trading and transactional history on the Platform; and
    - the payments which we receive, or otherwise, charge you (e.g. our fees for your use of the Platform).

- **Portfolio Data** includes details about the cryptocurrencies and amounts credited to your Account.
- **AML / KYC Data** includes the following due diligence / KYC information and documentation about you: (i) copy of I.D. card or passport, (ii) proof of residence (e.g. utility bill), (iii) KYC database checks, (iv) fraud database checks and (v) any documentation or information which we may, from time to time:
    - be required to collect to ensure compliance with any applicable legislation (including applicable foreign laws) and global AML/KYC practices; and/or
    - otherwise be mandated to collect under the Bank Secrecy Act ("**BSA**"), and/or any other competent authority or law enforcement agency.

- **Suitability Data** in cases where you decide to make use of our wealth/portfolio management services and/or investment advisory services and/or related custody services, we shall need to carry out an assessment of the right investment for you. In this regard we may also collect information relating to your employment, previous experience in investment and finance, financial situation and investment objectives.
- **Technical Data** includes the IP address, your login data to the Platform (username and password), device type, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and other technology on the devices you use to access the Site and Platform.
- **Usage Data** includes information about how you use the Platform and the Services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of the Site and/or the Platform. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

<u>If you Fail to provide Personal Data</u>

Should you fail to provide personal data when requested, or else provide incomplete or insufficient data, we may not be able to perform or conclude the contract which we have or are otherwise trying to enter into with you (namely regarding your account opening on the Platform and provision of our related services).

In certain instances, particularly where this relates to **AML / KYC Data**, we may even need to exercise our prerogative to terminate our contract with you as we would not be able to fulfill a legal requirement, and thus withdraw the availability of our services to you or else refuse to

process any trades which you may try to effect over the Platform. We will however notify you if this is the case at that point in time.

Sensitive Personal Data

We do not knowingly collect Special Categories of Personal Data (or Sensitive Personal Data) about you. Should we receive sensitive personal data about you, we will only process that data where there is a legitimate reason to do so and, in all circumstances, in accordance with our obligations at law and under the appropriate safeguards.

As set out below in Section 5, we collect and process AML / KYC Data in order to be able to (i) comply with legal and regulatory obligations, as applicable (ii) conduct our AML and KYC checks, and other due diligence checks, on you, (iii) verify your identity or claimed identity and identify and/or verify your source of funds and source of wealth, as appropriate (iv) take an informed decision on whether we want to enter into a customer relationship with you, and, if positive, to conduct initial and ongoing screening and monitoring and (iv) to comply with any legal or regulatory obligation that we may have and/or any Court, regulatory or enforcement order that may be issued upon us.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

a. Account Registration and Opening.

We will ask you to provide us with your **Identity Contact** and **Financial Data** when you apply to register and open an account with us on our Platform (including at account finalization stage). You provide these personal details and information to us, which we collect and process, when you fill in and submit our application form (together with other related forms) and complete our required application steps.

Your **Account Data** will be generated on the basis of your registration and use of our Platform and Services and is also processed and stored by us.

b. Service Use.

This may encompass all of the data categories listed in Section 3 (namely, Identity, Contact, AML and KYC Data, Enhanced KYC Data and Transaction Data).

c. Direct Interactions.

You may also give us your **Identity, Contact, Financial, AML / KYC Data** and **Transaction Data** by filling in our other forms (i.e. separate to our account opening and registration form), or

by corresponding with us by post, phone, e-mail or otherwise. This includes personal data that you provide when you, as applicable:

- apply to open an account;
- update or edit your account details;
- subscribe to our Platform;
- request withdrawals from your Account;
- contact us with complaints or queries;
- report issues;
- submit the (additional or supplementary) AML / KYC Data that we may request from you;
- request marketing to be sent to you;
- participate in a survey; or
- provide us with feedback.

d. Automated Technologies or Interactions.

As you interact with the Platform and the Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

e. Third Parties or Publicly Available Sources.

We may receive personal data about you from various third parties and public sources, as set out below:

- **Technical Data** from the following parties:
  - analytic providers
  - advertising networks
  - search information providers
- **Identity, Contact, AML / KYC Data** from publicly available sources such as public court documents, and the company houses and registers of other jurisdictions, and from electronic data searches, online KYC search tools (which may be subscription or license based), anti-fraud databases and other third party databases, sanctions lists, outsourced third-party KYC providers and from general searches carried out via online search engines.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you in respect of your customer relationship with us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental

rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

<u>Purposes for which we will Use your Personal Data</u>

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our]legitimate interests are where appropriate. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at support@coinpayments.net if you need details about the specific legal ground, we are relying on you to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of Data**	**Lawful Basis for Processing (including Basis of Legitimate Interest)**
To open and register your account with us and to create your digital wallet	a. Identity b. Contact c. Financial	a. Performance of a contract with you
To provide the Services, in particular: i. to match any orders for virtual financial assets in order to find an appropriate trade with another registered user; ii. manage payments, fees, charges and	a. Identity b. Contact c. Financial d. Transaction e. Portfolio f. Suitability	a. Performance of a contract with you a. Necessary for our legitimate interest to collect and recover debts and prevent fraudulent transactions

subscription costs; and iii. collect and recover money as may be appropriate; iv. assess and manage your portfolio and decide which trades to carry out; and v. investigate any suspected fraudulent transactions		
(i) To conduct due diligence checks on you (following your application to open and register an account).	a. Identity; b. Contact; c. Financial; d. AML / KYC Data;	a. Performance of a contract with you. b. Necessary for our legitimate interests, including to establish and verify: - your identity and suitability for our Platform,

(ii) To determine if we will enter into a relationship with you and accept to effect any transactions you may request on our Platform or otherwise provide the Services which you request		● the existence of any risks that you may present as a prospective customer of our Services, ● your ability to meet financial commitments, and ultimately, to enable us to take an informed decision on whether to carry out any transactions which you may request..

i. To establish and verify your identity. ii. To fulfil our other internal KYC policies and requirements. iii. To fulfil any external mandatory reporting obligations that we may have to our regulators or law enforcement and any other (including overseas) public, regulatory, law enforcement or tax authority.	a. Identity; b. Contact; c. AML / KYC Data; d. Transaction;	a. Necessary to comply with a legal obligation. b. Necessary for our legitimate interests (for risk assessment purposes, to prevent and mitigate against fraud, to safeguard the reputation of our business).
For legal, tax and accounting purposes (e.g. reporting to tax authorities, and accounting record requirements).	a. Financial; and b. Transaction.	Necessary to comply with a legal obligation.
To detect, prevent and report fraudulent or suspicious orders/transactions.	a. Identity; b. Contact a. AML / KYC Data b. Enhanced KYC Data; c. Financial; d. Portfolio;	a. Necessary to comply with a legal obligation (where applicable) b. Necessary for our legitimate interests, including in particular to: ● protect the reputation of our business; ● avoid any complicity or association with fraud; ● report fraudulent or otherwise suspicious orders that we receive (or which later came

	e. Transaction.	to our knowledge) to relevant public authorities.
To manage our relationship with you, including in particular to i. notify you about changes to our terms and conditions or privacy notices; ii. inform you about changes to our Platform (including the addition of new cryptocurrencies that are available to trading);	a. Identity; b. Contact; c. Financial; d. Account; e. Portfolio; f. Transaction; g. Usage; h. Marketing and Communications.	a. Performance of a contract with you. b. Necessary for our legitimate interests (for 'customer care' and service matters, to study how clients use our Platform, to assess our operations and the quality of our Services, to develop them and grow our business).

i. to send you updates regarding the management and performance of your portfolio where applicable.; ii. deal with your enquiries, requests, complaints or reported issues; iii. provide you with customer support and assistance; iv. contact you in relation to your account, portfolio and other related matters; v. ask you to participate in a survey; vi. request feedback from you; vii. advise you of industry and legislative updates ; viii. inform you about our events; ix. provide you with information about our Platform; x. administer your account; xi. provide you with any other		

information or materials that you have requested to receive from us; xii. manage disputes with you or other players; xiii. to identify and correct issues with the Platform and/or the Site.		
To administer and protect our business, including the Platform and the Site, (including troubleshooting, data analysis, testing, system maintenance, support, safety and security testing, reporting and hosting of data).	a. Identity; b. Contact; c. Technical; d. Account.	a. Necessary for our legitimate interests (for running and administering our business, network security, to prevent fraud, and in the context of a business reorganization or group restructuring exercise). b. Necessary to comply with a legal obligation. c. Performance of a contract with you.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising which we serve to you.	a. Identity; b. Contact; c. Account; d. Usage; e. Marketing and Communications;	Necessary for our legitimate interests (to study how clients use our Platform and our Services, to develop them, to grow our business and to inform our marketing strategy).}{}

To ensure that our content is presented in the most effective manner for you and your computer and devices, and in a user friendly manner.	f. Technical.	

Marketing

We strive to provide you with choices regarding certain personal data uses in relation to your account. Through your **Account, Identity, Contact, Technical, Usage and Marketing and Communications Data**, we can form a view on what we think you may want or need. We will send details as to how you may enhance your trading activity in relation to the account.
You may receive marketing communications from us (which may consist of newsletters, industry updates, mailshots, publications, promotional materials and/or information about our events) where:

- you provide your explicit consent to receiving the specific marketing material;
- you have an ongoing commercial or contractual relationship with us (e.g. where we consider you to be an active customer and user of the Platform); and
- provided you have not opted out of receiving marketing from us (see **Your right to object** below).

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third parties (including our associated or related corporate entities) for marketing purposes.

Opting Out

You can ask us to stop sending such advertising and marketing communications at any time by:

- following the opt-out links on any marketing message sent to you;
- contacting us at any time at support@coinpayments.net

Where you opt out of receiving such communications, this will not apply to personal data processed or provided to us as a result of your entry into a customer relationship with us and our Platform or as a user of our Services.

Change of Purpose

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without the need to obtain your consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in Section 5 above.

- External third parties. In particular we may share your personal data with our AML/CFT database provider which is located in the United States of the European Union.
- Suppliers and external agencies that we engage to process information on our and/or your behalf, including to provide you with the information and/or materials that you have requested.
- Our subsidiaries, associates, and agents where necessary to facilitate your relationship with us.
- The Commission for Revenue, regulators, law enforcement agencies and other authorities who require reporting of processing activities, or may request information from us, in terms of applicable law and in certain circumstances.
- Professional advisers such as consultants, bankers, professional indemnity insurers, brokers and auditors.
- Other organizations where exchange of information is for the purpose of fraud protection or credit risk reduction.
- Debt recovery agencies who assist us with the recovery of debts owed to us.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets (successors in title). Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law (including applicable data protection and privacy law). We do not allow our third party business partners or service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our documented instructions. Furthermore, these third parties access and process your data on the basis of strict confidentiality and subject to the appropriate security measures and safeguards.

We may also disclose your data if we are under a duty to disclose or share your personal data to comply with any legal obligation, judgment or under an order from a court, tribunal or authority.

6. INTERNATIONAL TRANSFERS

We do not generally transfer your personal data to entities outside the United States except as may be necessary to: (i) enable your use of the Platform or as necessary to provide the Services, (ii) fulfill our contractual obligations to you or exercise our contractual obligations against you, (iii) comply with our legal or regulatory obligations or (iv) assert, file or exercise a legal claim. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

How long will you use my personal data for?

Please note that we consider our relationship with you to be an ongoing and continuous customer relationship, until terminated

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for (i.e. the ongoing service provision) and, **thereafter**, for the purpose of satisfying any legal, accounting, tax and reporting requirements or obligations to which we may be subject and/or to the extent that we may also need to retain your personal data to be able to assert, exercise or defend possible future legal claims against or otherwise involving you. By and large, our retention of your personal data shall not exceed the period of **five (5) years** from the date of the termination of your relationship with us (which would typically arise from the closure/de-registration of your account on the Platform). This period of retention enables us to use the data in question for the possible filing, exercise or defense of legal claims (taking into account the timeframe of applicable statutes of limitation and prescriptive periods). We may need to revise this AML retention period in the event of applicable legal or regulatory developments, but we will notify you if this is the case at the time. In some circumstances, you can ask us to delete your data.

Data Minimisation

Whenever and to the extent possible, we anonymise the data which we hold about you when it is no longer necessary to identify you from the data which we hold about you (**anonymous data**). In some circumstances, we may even anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data*.
- *Right to withdraw consent*.

If you wish to exercise any of the rights set out above, please contact us at support@coinpayments.net. These rights are explained below.

Fees

You will not normally have to pay a fee to exercise your data subject rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in the above circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other data subject rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to Respond

We try to respond to all legitimate requests within the period of one month from receipt of the request. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

CHANGES TO THIS NOTICE

We reserve the right to amend or revise this Notice in the future, particularly where we need to take into account and cater for any (i) business developments and/or (ii) legal or regulatory developments to the issuance or trading of cryptocurrencies and virtual financial assets under applicable law. Changes, revisions and amendments to this Notice will be duly notified to you.

If you have any questions regarding this Notice, or if you would like to send us your comments, please contact us today or alternatively write to us using the details on our website.