

Privacy Policy

Last Updated: 24 October 2024

1. Introduction

As part of our daily business operations, we collect personal information from our clients and prospective clients in order to provide them with our products and services, and ensure that we can meet their needs when providing these products and services, as well as when providing them with any respective information.

Your privacy is of utmost importance to us, and it is our policy to safeguard and respect the confidentiality of information and the privacy of individuals. This Privacy Policy sets out how VOUCHER CURRENCY, its affiliates and subsidiaries (“the Company”, “We”, “Us”), collects, uses and manages the personal information we receive from you, or a third party, in connection with our provision of services to you or which we collect from your use of our services and/or our website. The Privacy Policy also informs you of your rights with respect to the processing of your personal information.

Our Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, as well as any changes to our business operations and practices are taken into consideration, as well as that it remains abreast of the changing regulatory environment. Any personal information we hold will be governed by our most recent Privacy Policy.

Please note that if you are an employee of the Company, a contractor to the Company or a third-party provider, your personal information will be used in connection with your employment contract or your contractual relationship, whichever applies.

This Privacy Policy applies to the processing activities performed by VOUCHER CURRENCY to the personal information of its clients and its potential clients and website visitors.

We may amend this Privacy Policy at any time by posting the amended version on this site including the effective date of the amended version. We will announce any material changes to this Privacy Policy on our website.

2. Definitions

2.1 As used herein, the following terms are defined as follows:

2.1.1 “Digital Asset” is a digital representation of value (also referred to as “cryptocurrency,” “virtual currency,” “digital currency,” “crypto token,” “crypto asset,” or “digital commodity”), such as bitcoin, XRP or ether, which is based on the cryptographic protocol of a computer network that may be (i) centralized or decentralized, (ii) closed or VOUCHER CURRENCY -source, and (iii) used as a medium of exchange and/or store of value.

2.1.2 “VOUCHER CURRENCY Account” means a user-accessible account offered by VOUCHER CURRENCY .

2.1.4 “We,” and “Us” refers to VOUCHER CURRENCY .

2.1.5 “Personal Information” or “Personal Data” or “your data” refers to any information relating to you, as an identified or identifiable natural person, including

your name, an identification number, location data, or an online identifier or to one or more factors specific to the physical, economic, cultural or social identity of you as a natural person.

2.1.6 “VASP Services” means exchange between virtual assets and fiat currencies; exchange between one or more forms of virtual assets; transfer of virtual assets, that is to say, conduct a transaction on behalf of another person that moves a virtual assets from one virtual asset address or account to another; and act as a custodian wallet provider.

3. How do we protect personal information?

The Company respects the privacy of any users who access its website, and it is therefore committed to taking all reasonable steps to safeguard any existing or prospective clients, applicants and website visitors.

The Company keeps any personal data of its clients and its potential clients in accordance with the applicable privacy and data protection laws and regulations.

We have the necessary and appropriate technical and organisational measures and procedures in place to ensure that your information remains secure at all times. We regularly train and raise awareness for all our employees to the importance of maintaining, safeguarding and respecting your personal information and privacy. We regard breaches of individuals’ privacy very seriously and will impose appropriate disciplinary measures, including dismissal from employment.

The personal information that you provide us with when applying to VOUCHER CURRENCY an account, applying for a role within the Company, or when using our website, is classified as registered information, which is protected in several ways. You

can access your registered information after logging in to your account by entering your username and the password that you have selected. It is your responsibility to make sure that your password is only known to you and not disclosed to anyone else. Registered information is securely stored in a safe location, and only authorised personnel have access to it via a username and password. All personal information is transferred to the Company over a secure connection, and thus all reasonable measures are taken to prevent unauthorised parties from viewing any such information. Personal information provided to the Company that does not classify as registered information is also kept in a safe environment and accessible by authorised personnel only through username and password.

4. Information we may collect about you

In order to VOUCHER CURRENCY an account with us, you must first complete and submit a “create account” form to us by completing the required information. By completing this form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant laws (including their regulations).

The information that we collect from you is as follows:

- a. Full name, residential address and contact details (e.g. email address, telephone number, fax etc.);
- b. Date of birth, place of birth, gender, citizenship; Bank account information, credit card details, including details about your source of funds, assets and liabilities, and OFAC information;

- c. Trading account balances, trading activity, your inquiries and our responses; Information on whether you hold a prominent public function (PEP);
- d. Verification information, which includes information necessary to verify your identity such as a passport, driver's licence or Government-issued identity card);
- e. Other Personal Information or commercial and/or identification information –
Whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under various anti-money laundering (AML) obligations.

5. Lawful basis for processing your personal information

We will process your personal information on the following bases and for the following purposes:

Performance of a contract

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with our clients (i.e. so as to perform our contractual obligations). In addition, the processing of personal data takes place to enable the completion of our client on-boarding process.

In view of the above, we must verify your identity in order to accept you as our client and we will use your personal data in order to effectively manage your trading account with us. This may include third parties carrying out credit or identity checks on our behalf. The use of your personal information is necessary for us to know who you are, as we have a legal obligation to comply with “Know Your Customer” and customer due diligence regulatory obligations.

Compliance with a legal obligation

There are a number of legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements e.g. anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws. There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements imposed on us necessary personal data processing activities for identity verification, payment processing, compliance with court orders, tax laws or other reporting obligations and anti-money laundering controls.

These obligations apply at various times, including client on-boarding, payments and systemic checks for risk management.

For the purpose of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Example of such processing activities include the following:

- a. Initiating legal claims and preparing our defense in litigation procedures;
- b. Means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security and access controls;
- c. Measures for managing the business and for further developing products and services;
- d. Risk management.

To provide you with products and services, or information about our products and services, and to review your ongoing needs.

We may need to use personal information collected from you to investigate issues or to settle disputes with you because it is our legitimate interest to ensure that issues and disputes get investigated and resolved in a timely and efficient manner.

To comply with applicable laws, subpoenas, court orders, other judicial process, or the requirements of any applicable regulatory authorities

We may need to use your personal information to comply with any applicable laws and regulations, subpoenas, court orders or other judicial processes, or requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

To send you surveys

We may use your personal information to send you marketing communications by email or other agreed forms (including social media campaigns), to ensure you are always kept up-to-date with our latest products and services. If we send you marketing communications we will do so based on your consent and registered marketing preferences.

Internal business purposes and record keeping

We may need to process your personal information for internal business and research purposes as well as for record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the products and services we provide to you and our relationship with you. We will also keep records to ensure that you

comply with your contractual obligations pursuant to the agreement (“Terms of Service”) governing our relationship with you.

Legal Notifications

Often the law requires us to advise you of certain changes to products or services or laws. We may need to inform you of changes to the terms or the features of our products or services. We need to process your personal information to send you these legal notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us.

6. Disclosure of your personal information

The Company will not disclose any of its clients’ confidential information to a third party, except: (a) to the extent that it is required to do so pursuant to any applicable laws, rules or regulations; (b) if there is a duty to disclose; (c) if our legitimate business interests require disclosure; (d) in line with our Terms of Service; (e) at your request or with your consent or to those described in this Privacy Policy. The Company will endeavour to make such disclosures on a “need-to-know” basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

As part of using your personal information for the purposes set out above, the Company may disclose your personal information to the following:

- a. Any members of the Company, which means that any of our affiliates and subsidiaries may receive such information;

7. Where we store your personal data

Our operations are supported by a network of computers, servers, and other infrastructure and information technology, including, but not limited to, third-party service providers.

8. Transfers of Personal Information outside of your country

By using our products and services, you consent to your Personal Data being transferred to other countries, including countries that have differing levels of privacy and data protection laws than your country. In all such transfers, we will protect your personal information as described in this Privacy Policy, and ensure that appropriate information sharing contractual agreements are in place.

9. Privacy when using digital assets and blockchains

Your funding by using Digital Assets, may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are **VOUCHER CURRENCY** to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because blockchains are decentralized or third-party networks which are not controlled or operated by **VOUCHER CURRENCY** or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

10. Data Retention

Safeguarding the privacy of your personal information is of utmost importance to us, whether you interact with us personally, by phone, by email, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in secure computer storage facilities, and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time (after you cease being our client). For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of 5 years after our business relationship with you has ended.

- a. A copy of the records we used in order to comply with our client due diligence obligations;
- b. Supporting evidence and records of transactions with you and your relationship with us.

Also, the personal information we hold in the form of a recorded information, by telephone, electronically or otherwise, will be held in line with local regulatory requirements (i.e. 5 years after our business relationship with you has ended or longer if you have legitimate interests (such as handling a dispute with you)). If you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your data for longer than 5 years if we cannot delete it for legal, regulatory, or technical reasons.

11. Cookies

When you use our products and services, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, “Cookies”) on your computer or other devices used when engaging with us. We use Cookies to (i) help us recognize you as a customer, collect information about your use of our products and services, to better customize our services and content for you, and to collect information about your computer or other access devices to ensure our compliance with our AML obligations.

12. Your rights regarding your personal information

The rights that are available to you in relation to the personal information we hold about you are outlined below.

Information Access

If you ask us, we will confirm whether we are processing your personal information and, if so, what information we process and, if requested, provide you with a copy of that information within 30 days from the date of your request.

Rectification

It is important to us that your personal information is up to date. We will take all reasonable steps to make sure that your personal information remains accurate, complete and up-to-date. If the personal information we hold about you is inaccurate or

incomplete, you are entitled to have it rectified. If we have disclosed your personal information to others, we will let them know about the rectification where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your personal information so that you can contact them directly.

You may inform us at any time that your personal details have changed by emailing us at info@VOUCHER CURRENCY .com. The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof i.e. personal information that we are required to keep for regulatory or other legal purposes.

Erasure

You can ask us to delete or remove your personal information in certain circumstances such as if we no longer need it, provided that we have no legal obligation to retain that data. Such requests will be subject to the contract that you have with us, and to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal information to others, we will let them know about the erasure request where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your personal information so that you can contact them direct.

Processing restrictions

You can ask us to block or suppress the processing of your personal information in certain circumstances such as if you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information. We

will inform you before we decide not to agree with any requested restriction. If we have disclosed your personal information to others, we will let them know about the restriction of processing if possible. If you ask us, if possible and lawful to do so, we will also inform with whom we have shared your personal information so that you can contact them direct.

Data portability

In certain circumstances you might have the right, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

Objection

You can ask us to stop processing your personal information, and we will do so, if we are:

- a. Relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- b. Processing your personal information for direct marketing; or
- c. Processing your personal information for research unless we reasonably believe such processing is necessary or prudent for the performance of a task carried out in the public interest (such as by a regulatory or enforcement agency).

Automated decision-making and profiling

13. Changes to this Privacy Policy

Our Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, as well as any changes to our business operations and practices are taken into consideration, as well as that it remains abreast of the changing regulatory environment. Any personal information we hold will be governed by our most recent Privacy Policy.

If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and other places we deem appropriate.

14. Our products and services are not available to children

Our products and services are not directed to persons under the age of 18, hereinafter “Children”, “Child” and we do not knowingly collect personal information from Children. If we learn that we have inadvertently gathered personal information from a Child, we will take legally permissible measures to remove that information from our records. The Company will require the user to close his or her account and will not allow the use of our products and services. If you are a parent or guardian of a Child, and you become aware that a Child has provided personal information to us, please contact us at info@VOUCHER CURRENCY .com and you may request to exercise your applicable access, rectification, cancellation, and/or objection rights.

15. Contact Information

Any questions, complaints, comments and requests regarding this Privacy Policy are welcome and should be addressed to support@vouchercurrency.io