

Fasset Group

Privacy Policy

Last Updated: 2 September 2025

This Privacy Policy (the “**Policy**”) outlines how the Fasset Group uses, stores, and discloses Your Personal Data (defined in Clause 1.1(a)) when using Our Platform. This Policy should be read together with, and forms part of, Our Terms and Conditions (the “**Terms**”), which are available on the Platform. Unless otherwise defined herein, capitalised terms in this Policy have the meaning given to them in the Terms.

We recognise our responsibility to protect Personal Data by maintaining its confidentiality and are, therefore, committed to complying with the Personal Data protection laws, as applicable to each of our operating jurisdictions. Please read this Policy carefully so that You know and understand the purposes for which We collect, use, store and disclose Personal Data.

By accessing, browsing, or using the Platform, interacting with Us or providing Your data to Us, and subject to Your rights at law, You accept and agree to these terms which include sharing parts or all of Your Personal Data with Third-Party Service Providers. If You do not agree with any aspect of this Policy, You should immediately discontinue access or use of the Platform.

This Policy supplements but does not supersede or replace any other consents You may have previously provided to Us in respect of Your Personal Data, and Your consents herein are additional to any rights which the We may have at law to collect, use, or disclose Your Personal Data. This Policy only applies to the Fasset Group. As a part of the use of the Platform, You may be required to contract with or interact with certain Third-Party Service Providers as specified in Our Terms. Each of these Third-Party Service Providers may have their own privacy policies applicable to You. We recommend reading those policies as well.

We may from time to time update this Policy to ensure that it is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to Your rights at law, You agree to be bound by the prevailing terms of this Policy as updated from time to time. Please check back regularly for updated information on the handling of Your Personal Data.

1. Definitions

1.1 In this Policy, where the context otherwise requires, words in the singular shall include the plural, and vice versa, and the following terms have the following meanings:

- (a) “**Cookies** or “**Cookies Data**” shall have the same meaning ascribed in Clause 7.1 of this Policy;
- (b) “**Fasset Group**” shall refer to the Group of Companies included in and operating the Fasset platform. This includes Fasset FZE (“**Fasset Dubai**”), PT Gerbang Aset Digital (“**Fasset Indonesia**”); Fasset Labuan Limited (“**Fasset Labuan**”); FTL TEKNOLOJİ ANONİM ŞİRKETİ (“**Fasset Turkey**”); FTL EURO UAB (“**Fasset Lithuania**”); and Fasset Financial Services W.L.L. (“**Fasset Bahrain**”).
- (c) “**Personal Data**” means any information that directly or indirectly identifies a particular individual, including the KYC Data, and any other information that is subject to applicable data protection laws;
- (d) “**Personal Data Protection Authority**” means a regulatory body established by a government of a local jurisdiction who is responsible for overseeing the enforcement

and adherence to data protection laws and regulations applicable in that local jurisdiction;

- (e) **“Processing”** or **“Process”** means any operation or set of operations which is performed on Personal Data, whether or not by automatic means, including collecting, recording, organising, classifying into groups, storing, adapting, altering, retrieving, using, disclosing by transmission, dissemination, transference or otherwise making available for others, or combining, blocking, erasing, or destroying such Personal Data; and
- (f) **“Sources”** shall have the same meaning ascribed in Clause 4.1 of this Policy.

2. Scope

- 2.1 This Policy applies to Our collection, use and disclosure of Personal Data related to the Users of Our Platform.
- 2.2 This Policy does not apply to Your interactions with Third-Party Service Providers unless and to the extent that We, with Your consent, are providing Your Personal Data to such Third-Party Service Providers. Please read each Third-Party Service Provider’s privacy policy separately.
- 2.3 This Policy does not apply to job applicants or to Company employees and non-employee contractors, whose Personal Data is subject to different privacy notices.

3. Collection of Personal Data

- 3.1 The Personal Data We collect varies depending upon the User’s use of the Platform, the Tokens and Our Services.
- 3.2 While the Personal Data We collect depends on the circumstances, We collect the following types of personal data:
 - (a) Contact Information and other identifiers: identifiers such as email address, phone number, and other online identifiers.
 - (b) User records: electronic User records containing Personal Data.
 - (c) Device information: internet protocol (IP) address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, and mobile advertising identifiers.
 - (d) Communications and requests: direct communication between Users, web forms, online polls, or interactions with Our Platform, information You share with Us in Your communication with Us.
 - (e) User Content: We may maintain a record of User Content, including the location, date and time of submission, as well as any other information contained in that User Content.
 - (f) Cookie data: as explained in more detail later in this Policy.
 - (g) Marketing, surveys and events: if You sign up to receive news, updates, offers and other marketing communications from Us, We may collect Your name, contact information and information about Your preferences.
 - (h) Location data: location information about a particular individual or device, general location information (for example, Your IP address may indicate Your more general

geographic region).

- (i) KYC Data: in accordance with Clause 7 of Our Terms.
- (j) Profiles and inferences: inferences drawn from any of the information identified above to create a profile reflecting a User's preferences.

4. Sources of Personal Data

4.1 We may collect Personal Data from the following sources ("**Sources**"):

- (a) Directly from You: such as when You access or use Our Platform, participate in promotions We offer, register to receive marketing and other communications from Us, or contact Us for User support purposes. If You submit any Personal Data relating to other people to Us, You represent that You have the authority to do so and have informed that other person about the contents of this Policy.
- (b) From third parties: We may collect information about Users from openly available information on the internet.
- (c) From Third-Party Service Providers: We may collect information Users share with the Third-Party Service Providers and You grant Us and the concerned Third-Party Service Providers Your unequivocal consent for any such data sharing or collection.
- (d) Related to Your use of Our Platform: including information We collect automatically when You use Our Platform or interact with Us or information We derive about You and Your preferences or interests based on the Personal Data We collect and Our interactions with You. This information may be collected via Cookies when You use Our Platform and You can find more details about Our use of Cookies later in this Policy.

5. Use of Personal Data

5.1 We, and Our authorised third parties will only Process Your Personal Data where We have the legal grounds to do so. We may use Personal Data for a variety of purposes which are specific, explicit, and legitimate, as follows:

- (a) Providing support and services: to provide and operate Our Platform, Services or Tokens, to respond to Your inquiries, to provide troubleshooting, to fulfil Your requests related to Our Platform, Services or the Token, to provide technical support; and for other User service and support purposes. Our lawful basis is to fulfil any contractual terms with You.
- (b) Analysing and improving Our business: to better understand how Users access and use Our Platform, Services and Tokens, to evaluate and improve Our Platform, Services and Tokens and business operations, and to develop new features, offerings, and services; to conduct surveys and other evaluations (such as User satisfaction surveys); to monitor consumer interest in Our products and Platform, Services and Tokens; to troubleshoot problems that may arise on the Platform; to improve the accuracy of Our User database; to increase Our understanding of Our User database; to increase Our understanding of Our Users; and for other research and analytical purposes. Our lawful basis is Our legitimate business interests in understanding and improving Our Platform, Services or Tokens or consent where We use Cookies or similar technology that are not strictly necessary.
- (c) Personalising content and experiences: to tailor content We send or display on Our Platform and to otherwise personalise Your experiences. To assist in these purposes, as well as the other purposes identified in this Policy, at certain times, We create a profile relating to You in order to show You the content that We think You

might be interested in and to display the content according to Your preferences. Our lawful basis is Our legitimate business interests in offering a more personalised service or consent where We use Cookies or similar technology that are not strictly necessary.

- (d) Securing and protecting Our business: to protect and secure Our business operations, assets, and Platform; to investigate, prevent, detect, and take action regarding fraud, unauthorised access, situations involving potential threats to the rights or safety of any person or third-party, or other unauthorised activities or misconduct. Our lawful basis is Our legitimate business interests in protecting Our business and Platform.
 - (e) Defending Our legal rights: to manage and respond to actual and potential legal disputes and claims, and to otherwise establish, defend or protect Our rights or interests, including in the context of anticipated or actual litigation with third parties. Our lawful basis is Our legitimate business interests in protecting Our business or Our need to defend Ourselves legally.
 - (f) Auditing, reporting, corporate governance, and internal operations: relating to financial, tax and accounting audits; audits and assessments of Our operations, privacy, security and financial controls, risk, and compliance with legal obligations; Our general business, accounting, record keeping and legal functions; and relating to any actual or contemplated merger, acquisition, asset sale or transfer, financing, bankruptcy or restructuring of all or part of Our business. Our lawful basis is Our legal obligations under relevant legislation such as tax, reporting and/or Our legitimate interests in running Our compliance programmes.
 - (g) Complying with legal obligations: to comply with the law, Our legal obligations and legal process, such as warrants, subpoenas, court orders, and regulatory or law enforcement requests. Our lawful basis is compliance with applicable law.
- 5.2 We may also de-identify information and create anonymous and aggregated data sets and reports to assess, improve and develop Our business, products and Platform, prepare benchmarking reports on Our industry and for other research, marketing and analytics purposes.
- 5.3 Where We have indicated above that We rely on legitimate interests for Processing of Personal Data, We carry out assessments of likely adverse effects and if required a 'balancing' test to ensure that Our Processing is necessary and that Your fundamental rights of privacy are not outweighed by Our legitimate interests, before We go ahead with such Processing. We may also carry out a data protection impact assessment for processing that is likely to result in a high risk to You. You can Contact Us for more details on Our assessments in accordance with the provision of Clause 16.1.
- 5.4 Any wholly or partially automated data Processing operation or set of such operations intended to serve a single purpose or several related purposes shall be notified to the relevant Personal Data Protection Authority in the form and manner as required by applicable local laws.
- 5.5 Certain automated Processing of Personal Data will be conducted upon receiving appropriate authorisation from the Personal Data Protection Authority, if required by the local laws. Such Processing includes:
- a) automatic Processing of biometric data necessary for the verification of a User's identity;
 - b) automatic Processing involving linkage between Personal Data files, of two or more data controllers, Processed for different purposes; and
 - c) Processing that is done by means of visual recording and used for surveillance purposes.

6. Disclosure of Personal Data

6.1 We may share or disclose the Personal Data We may collect as follows:

- (a) Service providers: We may disclose Personal Data to third parties who use this information to perform services for Us, such as developers, auditors, advisors, consultants, User service and/or Third-Party Service Providers, *etc.*
- (b) Subsidiaries, Affiliates, and business partners: We may share Your Personal Data with Our Affiliates and other businesses We have partnered with to offer exclusive content on Our Platform; they may use such Personal Data for the purposes set out in this Policy.
- (c) Legal compliance: We may be required to share Personal Data in response to a valid court order, subpoena, government investigation, or as otherwise required by law. We also reserve the right to report to law enforcement agencies any activities that We, in good faith, believe to be unlawful.
- (d) Business transfers: We may disclose and/or transfer Personal Data as part of any actual or contemplated merger, sale, transfer of assets, acquisition, financing and/or restructuring of all or part of Our business, bankruptcy or similar event, including related to due diligence conducted prior to such event where permitted by law.
- (e) Protect Our rights: We may disclose Personal Data where We believe it necessary to respond to claims asserted against Us, to enforce or administer Our agreements and terms, for fraud prevention, risk assessment, investigation and/or to protect the rights, property or safety of the Company or Our Affiliates, partners, clients, Users and/or others.

6.2 We ensure third parties who receive Your Personal Data will handle Your Personal Data as required by applicable data protection laws, such by putting in place appropriate contracts with third parties to protect Your Personal Data.

7. Cookies and Analytics

7.1 **Cookies** are small alphanumeric identifiers or small data text files that are sent from a server during a browsing session and are placed on Your computer. When We refer to Cookies We include other technologies with similar purposes, such as pixels, tags and identifiers ("**Cookie Data**").

7.2 We use Cookies or similar technologies, which may be provided by third parties, on Our Platform to enable certain functionality and for security and fraud detection and prevention, as well as to collect usage information about Our Platform and the emails that We send, and to personalise content and provide more relevant ads and information. We may combine the information We collect via these technologies with other information, including Personal Data.

7.3 Details of Your Cookie preferences are presented to You when You first use the Platform or visit the Website in incognito mode, but You can also change Your preferences any time through Your browser settings or Our consent tool. We always ask for Your consent before deploying any non-essential cookies or similar technology.

8. Children's Privacy

8.1 Following the User Eligibility criteria as specified in the Terms, the use of Our Platform is restricted to Users over the age of 18.

8.2 If We discover that We have collected Personal Data from a child who is under the age of

13, We will promptly delete such Personal Data. If You have any concerns regarding the data of children, please Contact Us at help@fasset.io

9. Security

- 9.1 The security of Your Personal Data is important to us. We have put in place the appropriate technical and organisational safeguards to guarantee the protection of the Personal Data We collect against accidental or unauthorised access, use and disclosure, and We take steps to ensure that all of Our employees, agents, contractors and other third parties have similar adequate measures in place. The technical and organisational measures We adopt shall be recorded and made accessible to all relevant parties if required by local laws. We also have procedures to deal with any suspected Personal Data breach, and We will notify You and any applicable regulator when We are legally required to do so. However, We cannot guarantee that unauthorised access, hacking, data loss, or other breaches will never occur. We urge You to take steps to keep Your Personal Data safe, such as choosing a strong password and logging out of Your User account and closing Your web browser when You have finished using the Platform.

10. Transfers Outside Your Home Country

- 10.1 We may transfer Your Personal Data to countries outside of Your home country when necessary for the purposes outlined in Section 5.1 of this Policy regarding the Use of Personal Data. The privacy laws in countries outside Your home country may be different from those in Your home country.
- 10.2 If We transfer Your Personal Data to countries outside of Your home country, We will take steps to comply with the requirements for such transfer in Your home country as required by relevant law.

11. Links to Third-Party Websites

- 11.1 Our Platform provides links to various websites operated by third parties including, but not limited to, third-party sites that may display Our trademarks. This Policy does not apply to third-party websites that are accessible through the Platform unless such website directs Users or visitors to this Policy. When You click on one of these links, You will be transferred out of the Platform and connected to the website of the organisation or company that maintains that website. Even if an affiliation exists between Our Platform and a third-party website, We exercise no control over and assume no responsibility for linked websites. Each of these linked websites maintains its own independent privacy and data collection policies and procedures. We encourage You to read the privacy policies of those other websites to learn how they collect, use, share, and secure Your information before providing any Personal Data.

12. Retention

- 12.1 Except to the extent prohibited by law, and subject to this Policy, We will retain and use Your Personal Data for as long as it is needed to provide You access to the Platform, provide any other services, communications, information You have requested, or access to the Services, to document Our business relationship with You, and as necessary to comply with Our legal obligations, resolve disputes, and enforce Our agreements. As soon as it is reasonable to assume Your Personal Data is no longer needed or required, We will cease to retain Your Personal Data.

13. Your Rights

- 13.1 By law, You have a number of rights when it comes to Your Personal Data. Further information and advice about Your rights can be obtained from the data protection regulator in Your country. The rights You have depend on the jurisdiction in which You are based and all rights envisaged in relevant data protection laws of the jurisdiction may be exercised.

- 13.2 You may request for a copy of the Personal Data which We hold about You or information about the ways We use or disclose about Your Personal Data. You may also ask Us to correct or update Your Personal Data or withdraw Your consent and request Us to stop using or disclosing Your Personal Data for any of the purposes stated in this Policy.
- 13.3 You may do so by submitting Your request in writing or via email in accordance with Clause 16.1.
- 13.4 We usually act on requests and provide information free of charge, but We may charge a reasonable fee to cover Our administrative costs of providing the information for baseless or excessive/repeated requests, or further copies of the same information. Alternatively, We may be entitled to refuse to act on the request in some circumstances.
- 13.5 We will respond as soon as We can. Generally, this will be within one month from when We receive Your request but, if the request is going to take longer to deal with, We will come back to You and let You know.
- 13.6 Depending on applicable law, Your rights may include the following:

- (a) *The right to be informed.* You have the right to be provided with clear, transparent, and easily understandable information about how We use Your Personal Data and Your rights. This is why We are providing You with the information in this Policy. If You have any additional questions concerning the Processing of Your Personal Data, for example, regarding transfers and locations of data, please Contact Us in accordance with the provisions of Clause 16.1 and, if required by the local laws, by providing Your proof of identity.
- (b) *The right of access.* You have the right to obtain access to Your Personal Data (if We are Processing it), and certain other information (similar to that provided in this Policy) save for any applicable exemptions to do so under the data protection law. This is so You are aware and can check that We are using Your Personal Data in accordance with data protection law.
- (c) *The right to rectification.* You are entitled to have Your information corrected if it is inaccurate or incomplete.
- (d) *The right to erasure (data deletion).* You have the right to request the deletion of Your Personal Data where there is no compelling reason for Us to continue processing it, subject to applicable law. To exercise this right, You may submit a request by contacting Us by email at legal@fasset.com, with the subject line "Data Deletion Request"

We may ask You to provide sufficient information to verify Your identity before acting on the request. Once verified, We will process Your request as soon as reasonably practicable, and in any case within the time period required by applicable law. Please note that certain legal or regulatory obligations may require Us to retain specific data despite Your deletion request.

- (e) *The right to restrict Processing.* You have rights to 'block' or suppress further use of Your Personal Data. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
- (f) *The right to data portability.* You have rights to have Your Personal Data transferred to another organisation under certain conditions.
- (g) *The right to object to Processing.* You have the right to object to certain types of Processing, including Processing for direct marketing and/or any form of Processing which may cause material or moral damage to User.

- (h) *The right to lodge a complaint.* You have the right to lodge a complaint about the way We handle or Process Your Personal Data with Your relevant data protection regulator.
- (i) *The right to withdraw consent.* If You have given Your consent to anything We do with Your Personal Data, You have the right to withdraw Your consent at any time (although if You do so, it does not mean that anything We have done with Your Personal Data with Your consent up to that point is unlawful). This includes Your right to withdraw consent to Us using Your Personal Data for marketing purposes. Please note that any such withdrawal of consent may result in You being unable to use or access the Platform or Your Account.
- (j) *The right to object to automated decision-making.* You have the right not to be subject to a decision based solely on automated Processing, including profiling, which produces legal effects concerning You or similarly significantly affects You. Automated Processing is ordinarily intended to assess Your reliability or conduct. You shall have the right to request Processing in a manner that is not solely automated. Reconsideration in this case shall be obligatory by Us and be free of charge, if required by applicable local laws.

14. Changes to This Policy

- 14.1 This Policy is kept under regular review and may be updated from time to time. When We make changes to this Policy, We will change the "Updated" date above. If a material change is made to this Policy, We may choose to provide notice to You of such change, such as by posting notice of that change on the first page of this Policy or on Our homepage, or by emailing Your email address on record with us.

15. Changes to Your Information

- 15.1 It is important that the information We hold about You is accurate and current. Please keep Us informed as soon as possible if Your Personal Data changes or is inaccurate during Your relationship with Us by using the contact details set out below.

16. Contact Us

- 16.1 If You have any concerns about Our privacy practices, please contact Us by email at help@fasset.io
- 16.2 If You are not satisfied with Our response to any complaint or believe Our Processing of Your Personal Data does not comply with applicable data protection laws, You can make a complaint to:
 - (a) If You are a User of Fasset Dubai: the UAE Data Bureau, incorporated by UAE Federal Decree-Law No. 44 of 2021 on the Establishment of the Emirates Data Office. If You are not satisfied with the decision of the UAE Data Bureau, You may submit a written grievance to the General Manager of the UAE Data Bureau.
 - (b) If You are a User of Fasset Indonesia: the Ministry of Communication and Information Technology (Kementerian Komunikasi dan Informatika Republik Indonesia).
 - (c) If You are a User of Fasset Labuan: the Personal Data Protection Department (PDP).
 - (d) If You are a User of Fasset Turkey: the Personal Data Protection Authority (KVKK - Kişisel Verileri Koruma Kurumu).

- (e) If You are a User of Fasset Lithuania: the State Data Protection Inspectorate (Valstybinė duomenų apsaugos inspekcija – VDAI).
- (f) If You are a User of Fasset Bahrain: the Personal Data Protection Authority of the Kingdom of Bahrain.