

PRIVACY POLICY

Level-Tech

Operated by Smart Money Commercial Brokers LLC

Last updated: 03 April 2026

This Privacy Policy explains how Smart Money Commercial Brokers LLC, having its registered address at AL NASR CENTRAL - HALL NO 1, Office NO 1-A67 (“**Smart Money**”, “**we**”, “**us**”, or “**our**”), collects, uses, stores, shares, and otherwise processes personal data in connection with the **Level** branded platform, website, onboarding tools, user interfaces, dashboards, applications, APIs, communications, and related services (collectively, the “**Platform**”).

Please read this Privacy Policy carefully.

By accessing or using the Platform, submitting information to us, creating an account, initiating onboarding, or otherwise interacting with us, you acknowledge that your personal data may be processed as described in this Privacy Policy.

1. Our Role

Smart Money operates Level as a technology platform, onboarding interface, and integration layer.

Smart Money is **not** a bank, payment institution, electronic money institution, card issuer, IBAN provider, wallet custodian, crypto-asset service provider, or financial institution. Smart Money does not itself provide regulated financial services to end users. Instead, the Platform may connect users with third-party licensed providers of financial or related services.

Accordingly, Smart Money may process personal data:

- to operate and administer the Platform;
- to onboard users;
- to communicate with users;
- to coordinate onboarding and service access with our white-label platform provider and other vendors;
- to transmit personal data to third-party licensed financial or crypto service providers that may provide services to users.

In some cases, Smart Money acts as an independent controller of personal data for its own business and compliance purposes. In other cases, Smart Money may process data together with, on behalf of, or in coordination with third-party providers, depending on the relevant service flow, contract structure, and legal requirements.

2. Scope of This Privacy Policy

This Privacy Policy applies to personal data processed by Smart Money in connection with:

- your use of the Platform;
- your access to our website, landing pages, forms, portals, and applications;
- your communications with us by email, phone, web form, chat, messaging tools, or other channels;
- your onboarding for services accessible through the Platform;

- your interaction with third-party providers through the Platform, to the extent Smart Money receives or transmits your personal data in that process.

This Privacy Policy does not replace the privacy policies of third-party financial service providers, identity verification providers, card issuers, IBAN providers, wallet providers, or other external partners. Where their services are used, their own privacy notices may also apply.

3. Legal and Regulatory Background

We process personal data in accordance with applicable laws and regulations, including, where applicable, the data protection laws of the United Arab Emirates, as well as other laws that may apply depending on the user's jurisdiction, the provider involved, and the nature of the service.

Where required or appropriate, we also implement internal controls relating to confidentiality, information security, fraud prevention, anti-money laundering, sanctions screening, legal reporting, and regulatory cooperation.

4. Categories of Personal Data We Collect

We may collect and process the following categories of personal data.

4.1 Information you provide directly

You may provide us with personal data when you:

- complete a registration or onboarding form;
- request access to the Platform or to services available through it;
- communicate with us;
- upload documents;
- participate in checks, verifications, or support processes.

This information may include:

- full name;
- date of birth;
- nationality;
- residential address and mailing address;
- email address;
- phone number;
- account login details;
- copies of passports, national ID cards, residence permits, visas, driver's licenses, or other identification documents;
- proof of address documents;
- tax identification information;
- employment information;
- source of funds / source of wealth information;

- wallet addresses;
- payment details;
- company information, including corporate registration documents, beneficial ownership data, and authorization documents where you act for a legal entity.

4.2 Information collected automatically

When you use the Platform, we may automatically collect certain technical and usage information, including:

- IP address;
- browser type and version;
- device identifiers;
- operating system;
- language settings;
- access times and dates;
- session logs;
- clickstream and navigation data;
- error logs and security events;
- approximate geolocation inferred from technical data where permitted.

4.3 Information from third parties

We may receive personal data from third parties, including:

- our white-label platform provider;
- identity verification and KYC vendors;
- AML / sanctions screening providers;
- fraud prevention and analytics vendors;
- payment, card, IBAN, wallet, crypto, or other financial service providers;
- corporate registries, public databases, watchlists, and sanctions lists;
- your representatives, introducers, employers, or affiliated entities;
- governmental, judicial, or regulatory authorities, where applicable.

5. Special Categories and Sensitive Data

Where necessary for onboarding, compliance, fraud prevention, or legal obligations, we or our service providers may process data that is considered sensitive or high-risk, such as:

- government-issued identification data;
- facial image or biometric comparison results used for identity verification;
- sanctions / PEP / adverse media screening results;
- source-of-funds and financial background information.

We only process such data where permitted by applicable law and where necessary for legitimate onboarding, compliance, security, or legal purposes.

6. How We Use Personal Data

We may use personal data for the following purposes:

- to provide, operate, maintain, and improve the Platform;
- to create and manage user accounts;
- to onboard users and process applications for services available through the Platform;
- to transmit onboarding data and documents to our white-label platform provider and relevant third-party financial service providers;
- to verify identity and eligibility;
- to conduct KYC, AML, sanctions, fraud, and risk screening;
- to communicate with you regarding onboarding, service status, support, security alerts, and administrative matters;
- to personalize your user experience and improve usability;
- to investigate suspicious or unauthorized activity;
- to comply with legal, regulatory, contractual, audit, and reporting obligations;
- to establish, exercise, or defend legal claims;
- to enforce our Terms of Use and other legal documents;
- to send marketing or promotional communications, where permitted by applicable law.

7. Legal Bases for Processing

Depending on the context, we may process your personal data on one or more of the following grounds:

- your consent;
- the need to take steps at your request before entering into a relationship or to perform a contract with you;
- our legitimate interests in operating the Platform, securing our business, preventing fraud, and improving our services;
- compliance with legal and regulatory obligations;
- the establishment, exercise, or defense of legal claims;
- other lawful grounds available under applicable law.

Where we rely on consent, you may withdraw it at any time, subject to any lawful basis we may have to continue processing certain data.

8. Sharing of Personal Data

We may share personal data with the following categories of recipients, where necessary:

8.1 Group companies and affiliates

Where relevant for internal administration, compliance, support, or business operations.

8.2 White-label and technology providers

Including hosting, infrastructure, CRM, onboarding, communication, analytics, cybersecurity, and software vendors.

8.3 Third-party financial service providers

Including licensed providers of card services, IBAN or account services, payment services, wallet services, custody services, virtual asset services, exchange services, or other financial infrastructure services made available through the Platform.

8.4 Verification and compliance providers

Including identity verification vendors, sanctions and AML screening providers, fraud detection vendors, and due diligence providers.

8.5 Professional advisers

Including lawyers, auditors, accountants, insurers, and consultants.

8.6 Authorities and regulators

Including courts, law enforcement agencies, regulators, supervisory bodies, tax authorities, and other competent authorities, where disclosure is required or appropriate.

8.7 Corporate transaction counterparties

In connection with a merger, restructuring, sale of assets, financing, acquisition, or similar corporate transaction, subject to appropriate confidentiality protections.

9. Cross-Border Transfers

Because we use international vendors and may facilitate access to third-party providers located in different jurisdictions, your personal data may be transferred to, stored in, or accessed from countries outside the United Arab Emirates.

Such countries may have data protection laws that differ from those of the UAE.

Where personal data is transferred internationally, we take reasonable steps to ensure that appropriate protections are in place, which may include:

- contractual safeguards;
- confidentiality obligations;
- data processing agreements;
- internal access controls;
- technical and organizational security measures.

By using the Platform and submitting your personal data, you acknowledge that such cross-border transfers may occur where necessary for onboarding, service provision, compliance, support, or technical operations.

10. Cookies and Similar Technologies

We may use cookies, pixels, SDKs, tags, local storage, and similar technologies to:

- enable Platform functionality;

- maintain session integrity;
- remember preferences;
- analyze usage patterns;
- improve performance;
- support security;
- measure marketing effectiveness.

Some cookies may be necessary for the Platform to function properly, while others may be used for analytics or marketing purposes.

You may control certain cookies through your browser settings or other available controls. Disabling some cookies may affect the functionality of the Platform.

Where required by applicable law, we will request consent before placing non-essential cookies or similar technologies.

11. Data Retention

We retain personal data for as long as reasonably necessary for the purposes described in this Privacy Policy, including for:

- onboarding and account administration;
- contractual and operational records;
- legal and regulatory compliance;
- anti-money laundering and fraud prevention;
- dispute resolution;
- enforcement of legal rights;
- audit and internal control purposes.

Retention periods may vary depending on the nature of the data, the service involved, the requirements of relevant third-party providers, and applicable legal obligations.

When personal data is no longer required, we will delete it, anonymize it, or securely archive it, as appropriate and permitted by law.

12. Data Security

We implement appropriate technical, organizational, and administrative measures designed to protect personal data against unauthorized access, accidental loss, misuse, alteration, disclosure, or destruction.

These measures may include:

- access controls and role-based permissions;
- secure hosting environments;
- encryption in transit and, where appropriate, at rest;
- activity logging and monitoring;

- security testing;
- vendor due diligence;
- internal policies and confidentiality requirements.

However, no method of transmission over the internet or method of electronic storage is completely secure. Accordingly, we cannot guarantee absolute security.

You are responsible for maintaining the confidentiality of your account credentials and for notifying us promptly if you suspect any unauthorized use.

13. Automated Decision-Making and Screening

We and/or our third-party providers may use automated tools, rules engines, and screening systems in connection with:

- identity verification;
- fraud detection;
- sanctions screening;
- PEP screening;
- transaction monitoring;
- risk scoring;
- onboarding approval workflows.

This may result in applications being flagged for review, delayed, restricted, or rejected.

Where required by applicable law, you may have the right to request additional information or human review of a relevant decision.

14. Your Rights

Subject to applicable law, you may have rights regarding your personal data, including the right to:

- request access to your personal data;
- request correction of inaccurate or incomplete data;
- request deletion of personal data in certain circumstances;
- request restriction of processing in certain circumstances;
- object to certain processing activities;
- withdraw consent where processing is based on consent;
- request a copy of certain personal data in a portable format, where applicable;
- lodge a complaint with a competent supervisory or regulatory authority.

These rights are not absolute and may be limited where we are legally entitled or required to continue processing data, for example for compliance, fraud prevention, legal defense, or regulatory recordkeeping purposes.

To exercise your rights, please contact us using the details below. We may require identity verification before responding to your request.

15. Marketing Communications

We may send you service-related communications without additional consent where necessary for the operation of the Platform or your relationship with us.

We may also send you marketing communications where permitted by applicable law. You may opt out of marketing communications at any time by using the unsubscribe function or contacting us directly.

Even if you opt out of marketing, we may still send you non-promotional communications relating to your account, onboarding, legal notices, security issues, or service updates.

16. Third-Party Websites and Services

The Platform may contain links to or integrations with websites, tools, or services operated by third parties.

We are not responsible for the privacy, security, or data handling practices of those third parties. You should review their privacy policies and terms before providing them with your personal data or using their services.

17. Children

The Platform is not intended for individuals under the age of 18, or the age of legal majority in the relevant jurisdiction, whichever is higher.

We do not knowingly collect personal data from children. If we become aware that we have collected personal data from a child without appropriate authorization, we may delete such data and restrict access.

18. Changes to This Privacy Policy

We may amend or update this Privacy Policy from time to time.

When we do so, we will update the "Last updated" date above. Where required by applicable law, we may also provide additional notice through the Platform, by email, or by other appropriate means.

Your continued use of the Platform after the updated Privacy Policy becomes effective constitutes your acknowledgment of the revised Privacy Policy.

19. Contact Us

If you have any questions, requests, or complaints regarding this Privacy Policy or our handling of personal data, please contact:

Smart Money Commercial Brokers LLC

AL NASR CENTRAL - HALL NO 1, Office NO 1-A67

Support contact: support@level-tech.io