

## COOKIE POLICY

### NOTAM PAY LTD. OTC SERVICES

**Last updated:** 05 May 2026

This Cookie Policy explains how NOTAM PAY LTD. uses cookies, pixels, tags, scripts, local storage, software development kits, device identifiers and similar technologies in connection with its website, platform, online forms, client onboarding flows, OTC Services and related digital channels.

This Cookie Policy should be read together with our Privacy Policy and our Terms and Conditions for NOTAM PAY LTD. OTC Services.

By continuing to use our website, platform, online forms or other digital services, you acknowledge that we may use cookies and similar technologies as described in this Cookie Policy, subject to your choices and applicable law.

#### 1. ABOUT NOTAM PAY LTD.

1.1. NOTAM PAY LTD. is a company incorporated under the laws of the Province of British Columbia, Canada, with incorporation number BC1575404 and Business Number 706910965BC0001, having its registered office at 1783 Manitoba St, Vancouver, BC V5Y 0K1, Canada.

1.2. NOTAM PAY LTD. is registered as a Money Services Business with the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) under MSB Registration Number N300000181.

1.3. In this Cookie Policy, “NOTAM PAY”, “we”, “us” and “our” refer to NOTAM PAY LTD.

1.4. For questions about this Cookie Policy or our use of cookies and similar technologies, please contact:

**Privacy Officer’s email:** [legal@notampay.com](mailto:legal@notampay.com)

**Address:** 1783 Manitoba St, Vancouver, BC V5Y 0K1, Canada

**Website:** Notampay.com

#### 2. SCOPE OF THIS COOKIE POLICY

2.1. This Cookie Policy applies to cookies and similar technologies used in connection with:

- (a) our website;
- (b) our OTC Services;
- (c) online onboarding forms;
- (d) KYC and identity verification flows;
- (e) transaction request and quote request forms;
- (f) client portals, if made available;
- (g) support and communication tools;
- (h) security, fraud prevention and compliance systems;
- (i) analytics and service improvement tools;
- (j) marketing tools, where used and where permitted by applicable law.

2.2. This Cookie Policy applies primarily to individual users. Where we provide OTC Services to Business Clients in cases permitted by applicable law, this Cookie Policy also applies to cookies and similar technologies used in relation to the Business Client's representatives, directors, officers, beneficial owners, authorized signatories, employees, contractors and other related individuals.

2.3. This Cookie Policy does not apply to cookies or similar technologies used by third-party websites, wallets, exchanges, banks, payment service providers, custodians, liquidity providers or other independent third parties, except where such technologies are used on our website or digital channels on our behalf.

### **3. WHAT ARE COOKIES AND SIMILAR TECHNOLOGIES?**

3.1. **Cookies** are small text files placed on your browser or device when you visit a website. Cookies may allow a website to recognize your browser, remember your preferences, maintain a secure session, support website functionality, analyze usage or support security controls.

3.2. **Similar technologies** may include:

- (a) pixels;
- (b) tags;
- (c) scripts;
- (d) local storage;
- (e) session storage;
- (f) device identifiers;
- (g) browser fingerprinting technologies;
- (h) software development kits;
- (i) server logs;
- (j) tracking URLs;
- (k) similar technologies used to store or access information on your device or browser.

3.3. Some cookies and similar technologies may collect information that identifies you or can reasonably be linked to you. Where such information is Personal Information, we process it in accordance with our Privacy Policy and applicable privacy laws.

### **4. TYPES OF COOKIES WE MAY USE**

4.1. We may use the following categories of cookies and similar technologies.

#### **4.2. Strictly necessary cookies**

These cookies are required for the operation, security and basic functionality of our website, platform, onboarding flows and OTC Services.

They may be used to:

- (a) load pages correctly;
- (b) maintain secure sessions;
- (c) remember cookie preferences;

- (d) process quote requests;
- (e) support client onboarding;
- (f) protect against fraud, abuse, bots and cyberattacks;
- (g) maintain website and platform security;
- (h) support compliance and audit logs;
- (i) enable secure access to forms or client portals, if available.

Strictly necessary cookies cannot usually be disabled through our cookie preference tool because the website or service may not function properly without them. You may disable them through your browser settings, but doing so may affect the availability, security or functionality of our website or OTC Services.

#### **4.3. Functional cookies**

Functional cookies help us remember your choices and improve your experience.

They may be used to remember:

- (a) language preferences;
- (b) region or country preferences;
- (c) display settings;
- (d) form progress;
- (e) communication preferences;
- (f) previously selected cookie preferences.

If you disable functional cookies, some features may not work as intended.

#### **4.4. Analytics and performance cookies**

Analytics and performance cookies help us understand how visitors use our website, online forms and digital channels.

They may be used to collect information about:

- (a) pages visited;
- (b) time spent on pages;
- (c) referral sources;
- (d) device and browser type;
- (e) approximate location derived from IP address;
- (f) error messages;
- (g) user flows;
- (h) form completion issues;
- (i) technical performance.

We use this information to improve website performance, onboarding flows, security, user experience and service reliability.

Where analytics cookies collect Personal Information or information that can reasonably be linked to an individual, we use them in accordance with applicable privacy laws and, where required, with your consent.

#### **4.5. Security, fraud prevention and compliance cookies**

Because NOTAM PAY provides OTC digital asset exchange services and is subject to AML/ATF, sanctions, fraud prevention and compliance requirements, we may use cookies and similar technologies to protect our systems and support compliance controls.

These technologies may help us:

- (a) detect suspicious access patterns;
- (b) prevent account takeover attempts;
- (c) identify bots, scraping or automated abuse;
- (d) detect multiple failed verification attempts;
- (e) support device and session security;
- (f) prevent fraud and identity misuse;
- (g) support KYC and onboarding integrity;
- (h) maintain audit trails;
- (i) investigate suspicious activity;
- (j) protect clients, counterparties and NOTAM PAY.

Security, fraud prevention and compliance cookies may be essential for the safe provision of our website, onboarding flows and OTC Services.

#### **4.6. Marketing and advertising cookies**

We may use marketing or advertising cookies only where we decide to conduct marketing campaigns and where permitted by applicable law.

These cookies may be used to:

- (a) measure the effectiveness of marketing campaigns;
- (b) understand whether a visitor came from a particular campaign;
- (c) avoid showing the same advertisement repeatedly;
- (d) personalize or measure advertising content;
- (e) support retargeting or similar advertising activities.

We do not use marketing cookies for minors, and the OTC Services are not intended for minors.

Where required by applicable law, we will request your consent before using marketing or advertising cookies. You may withdraw your consent at any time.

#### **4.7. Third-party cookies**

Some cookies and similar technologies may be provided by third parties acting on our behalf or integrated into our website or digital channels.

These third parties may include:

- (a) website hosting providers;
- (b) analytics providers;
- (c) cybersecurity providers;

- (d) fraud prevention providers;
- (e) identity verification providers;
- (f) KYC providers;
- (g) sanctions screening providers;
- (h) blockchain analytics providers;
- (i) customer support providers;
- (j) marketing service providers, where used.

Third-party cookies are subject to the privacy policies and cookie policies of the relevant third parties, unless they process information solely on our behalf under contract.

## **5. WHY WE USE COOKIES**

5.1. We may use cookies and similar technologies for the following purposes:

- (a) to operate our website and digital services;
- (b) to provide secure access to online forms and client portals;
- (c) to remember your cookie preferences;
- (d) to support onboarding and verification flows;
- (e) to process quote requests and transaction-related forms;
- (f) to maintain security and prevent fraud;
- (g) to detect suspicious, automated or abusive activity;
- (h) to comply with legal, regulatory, AML/ATF and sanctions obligations;
- (i) to monitor and improve website performance;
- (j) to understand how users interact with our website;
- (k) to diagnose technical issues;
- (l) to maintain audit logs and security logs;
- (m) to improve the OTC Services and user experience;
- (n) to conduct marketing or campaign measurement where permitted by law and subject to your choices.

## **6. INFORMATION COLLECTED THROUGH COOKIES**

6.1. Cookies and similar technologies may collect or process the following types of information:

- (a) IP address;
- (b) browser type and version;
- (c) device type;
- (d) operating system;
- (e) device identifiers;
- (f) cookie identifiers;

- (g) session identifiers;
- (h) pages visited;
- (i) date and time of access;
- (j) referral URL;
- (k) approximate location derived from IP address;
- (l) language and region settings;
- (m) user preferences;
- (n) interaction with forms or website elements;
- (o) security logs;
- (p) fraud prevention indicators;
- (q) technical error logs;
- (r) marketing campaign identifiers, where applicable.

6.2. In connection with OTC Services, cookies and similar technologies may also support the secure processing of:

- (a) onboarding sessions;
- (b) KYC verification steps;
- (c) quote requests;
- (d) transaction request forms;
- (e) support requests;
- (f) compliance checks;
- (g) suspicious activity detection;
- (h) device or session risk assessments.

6.3. We do not use cookies to collect your private keys, seed phrases, full wallet recovery phrases or wallet passwords. You should never disclose such information to NOTAM PAY or any third party.

## **7. CONSENT AND YOUR CHOICES**

7.1. We use cookies and similar technologies in accordance with applicable privacy laws, including Canadian federal privacy law and the privacy laws of British Columbia, where applicable.

7.2. Where cookies are strictly necessary to provide a secure and functional website or OTC Services, they may be used without separate optional consent, subject to applicable law.

7.3. Where cookies or similar technologies are used for analytics, marketing, advertising or other non-essential purposes and collect Personal Information, we will provide notice and, where required by applicable law, obtain meaningful consent.

7.4. You may manage your cookie preferences through:

- (a) our cookie banner or cookie preference centre, where available;
- (b) your browser settings;

- (c) device settings;
- (d) privacy tools provided by third parties;
- (e) contacting us at the details set out in this Cookie Policy.

7.5. You may withdraw or change your consent at any time, subject to legal, operational and technical limitations.

7.6. If you disable or reject certain cookies, some website features, onboarding flows, quote request tools, security features or OTC Services may not function properly.

## **8. CASL AND TECHNOLOGIES PLACED ON YOUR DEVICE**

8.1. Certain cookies, scripts, local storage technologies or similar tools may involve placing or accessing information on your device or browser.

8.2. To the extent any such technology constitutes the installation or use of a computer program under Canada's Anti-Spam Legislation or other applicable law, NOTAM PAY will seek consent or rely on an available deemed consent or legal exception where permitted by law.

8.3. We do not knowingly use cookies or similar technologies to install malware, spyware or software intended to take control of your device, collect information unlawfully, interfere with your device, or bypass your privacy settings.

8.4. You should maintain appropriate security controls on your own devices, browsers, email accounts, messaging accounts and wallets.

## **9. THIRD-PARTY ANALYTICS AND SERVICE PROVIDERS**

9.1. We may use third-party analytics, hosting, cybersecurity, fraud prevention, KYC, blockchain analytics, communications and support providers in connection with cookies and similar technologies.

9.2. These providers may process information such as IP address, device information, browser information, cookie identifiers, usage data, session data and security logs.

9.3. We require service providers that process Personal Information on our behalf to use appropriate safeguards and process Personal Information only for authorized purposes, subject to applicable law and contractual obligations.

9.4. Some third-party providers may process information outside Canada. Personal Information processed outside Canada may be subject to the laws of the foreign jurisdiction and may be accessible to courts, regulators, law enforcement or government authorities in that jurisdiction.

## **10. INTERNATIONAL TRANSFERS**

10.1. Information collected through cookies and similar technologies may be transferred to, stored in or processed in Canada, the United States, the European Economic Area, the United Kingdom or other jurisdictions where NOTAM PAY or its service providers operate.

10.2. Where information collected through cookies and similar technologies is transferred outside Canada, we use contractual, organizational and technical safeguards designed to protect such information in a manner consistent with applicable privacy laws.

10.3. By using our website, platform, online forms or other digital services, you acknowledge that information collected through cookies and similar technologies may be processed outside your jurisdiction of residence.

## **11. RETENTION OF COOKIE DATA**

11.1. The duration of cookies may vary depending on their purpose.

11.2. **Session cookies** are deleted when you close your browser or end your session.

11.3. **Persistent cookies** remain on your browser or device for a set period or until you delete them.

11.4. We retain information collected through cookies and similar technologies only for as long as reasonably necessary for the purposes described in this Cookie Policy, or as permitted or required by applicable law.

11.5. Security, fraud prevention, compliance and audit logs may be retained for longer periods where necessary for:

- (a) AML/ATF compliance;
- (b) sanctions compliance;
- (c) fraud prevention;
- (d) cybersecurity;
- (e) FINTRAC record-keeping;
- (f) legal claims;
- (g) audit purposes;
- (h) dispute resolution;
- (i) regulatory inquiries.

11.6. Where cookie data is no longer required, we will delete, anonymize or de-identify it, unless continued retention is permitted or required by law.

## **12. MANAGING COOKIES THROUGH YOUR BROWSER**

12.1. Most browsers allow you to manage cookies through browser settings.

12.2. Depending on your browser, you may be able to:

- (a) block all cookies;
- (b) block third-party cookies;
- (c) delete existing cookies;
- (d) receive alerts before cookies are stored;
- (e) clear local storage and site data;
- (f) manage tracking prevention settings.

12.3. Browser settings vary by browser and device. You should review your browser's help materials for specific instructions.

12.4. If you block or delete cookies, you may need to re-enter preferences or information when you return to our website.

12.5. Blocking cookies may affect the availability, functionality or security of our website, onboarding flows or OTC Services.

### **13. DO NOT TRACK AND GLOBAL PRIVACY CONTROLS**

13.1. Some browsers or devices may offer “Do Not Track” signals or similar privacy controls.

13.2. There is currently no uniform industry or legal standard in Canada requiring websites to respond to all such signals in the same way.

13.3. Where legally required or technically supported, we will respect recognized consent-preference signals or similar privacy controls.

13.4. You may also manage your cookie preferences through our cookie preference centre, where available, or by contacting us.

### **14. MARKETING COOKIES AND ELECTRONIC COMMUNICATIONS**

14.1. If we use marketing cookies, we will do so in accordance with applicable privacy and electronic communications laws.

14.2. Marketing cookies may be used to measure campaign performance, understand referral sources or personalize marketing content, subject to your choices and applicable law.

14.3. We may send marketing electronic communications only where permitted by applicable law and, where required, with your consent.

14.4. You may opt out of marketing communications at any time by using the unsubscribe mechanism in the relevant message or by contacting us.

14.5. Even if you opt out of marketing communications, we may still send service-related communications, including transaction notices, security alerts, compliance requests, operational updates and legal notices.

### **15. MINORS**

15.1. Our website and OTC Services are not intended for minors.

15.2. You must be at least nineteen (19) years old or the age of majority in your jurisdiction of residence, whichever is higher, to use the OTC Services.

15.3. We do not knowingly use cookies or similar technologies to track minors for the purpose of providing OTC Services or marketing Digital Asset services.

15.4. If we become aware that a minor has accessed or attempted to use the OTC Services, we may take steps to restrict access, delete information where appropriate, or retain limited information where required for legal, security, fraud prevention or compliance purposes.

### **16. PUBLIC BLOCKCHAINS AND COOKIE DATA**

16.1. Cookies and similar technologies do not control public blockchains.

16.2. However, cookies and similar technologies may be used to support secure onboarding, wallet verification, transaction request forms, blockchain analytics integrations or compliance workflows.

16.3. Public blockchain information, such as wallet addresses, transaction hashes, transaction amounts and timestamps, may be publicly visible and may be processed together with information collected through our website or systems for compliance, security or transaction monitoring purposes.

16.4. NOTAM PAY does not control public blockchains and cannot delete, modify or hide information recorded on a public blockchain.

## **17. SECURITY**

17.1. We use reasonable technical, organizational and physical safeguards appropriate to the sensitivity of information collected through cookies and similar technologies.

17.2. These safeguards may include:

- (a) encryption or secure transmission where appropriate;
- (b) access controls;
- (c) authentication measures;
- (d) audit logs;
- (e) security monitoring;
- (f) vendor due diligence;
- (g) contractual safeguards;
- (h) incident response procedures;
- (i) role-based access restrictions;
- (j) regular review of security and compliance controls.

17.3. No method of internet transmission, website operation or electronic storage is completely secure. We cannot guarantee absolute security.

17.4. You are responsible for securing your own devices, browsers, email accounts, messaging accounts, wallets, bank accounts and credentials.

## **18. CHANGES TO THIS COOKIE POLICY**

18.1. We may update this Cookie Policy from time to time to reflect changes in:

- (a) our website or platform;
- (b) OTC Services;
- (c) cookies and similar technologies used by us;
- (d) legal or regulatory requirements;
- (e) security, compliance or AML/ATF controls;
- (f) service providers;
- (g) business practices.

18.2. The updated Cookie Policy will be effective from the date stated at the top of the updated version.

18.3. Where required by applicable law, we will provide notice of material changes or request renewed consent.

18.4. Your continued use of our website, platform, online forms or OTC Services after the updated Cookie Policy becomes effective means that you acknowledge the updated Cookie Policy, subject to any consent requirements under applicable law.

## **19. RELATIONSHIP WITH PRIVACY POLICY AND TERMS**

19.1. This Cookie Policy forms part of the privacy and compliance framework applicable to NOTAM PAY's website, digital channels and OTC Services.

19.2. Our Privacy Policy explains more broadly how we collect, use, disclose, retain and protect Personal Information.

19.3. Our Terms and Conditions govern the contractual relationship between you and NOTAM PAY in relation to the OTC Services.

19.4. If there is a conflict between this Cookie Policy and the Privacy Policy regarding the processing of Personal Information, the Privacy Policy will prevail.

19.5. If there is a conflict between this Cookie Policy and the Terms and Conditions regarding transaction execution, fees, liability, dispute resolution or contractual matters, the Terms and Conditions will prevail.

## **20. CONTACT DETAILS**

For questions about this Cookie Policy, cookie preferences or our use of cookies and similar technologies, please contact:

**NOTAM PAY LTD.**

**Registered office:** 1783 Manitoba St, Vancouver, BC V5Y 0K1, Canada

**Email:** [support@notampay.com](mailto:support@notampay.com)

**Website:** Notampay.com

## **21. ACKNOWLEDGEMENT**

By using our website, platform, online forms, quote request tools, onboarding flows or other digital services, you acknowledge that you have read and understood this Cookie Policy.

Where required by applicable law, we will ask for your consent before using non-essential cookies or similar technologies that collect Personal Information.