



PRIVACY & GDPR POLICY

VERTICATE LTD (*hereinafter referred to as “the Company”, “We”, “Us”, “Our”*)

www.Verticate.io (*hereinafter referred to as the “Website” or “Platform” interchangeably*)

Please read this Privacy & GDPR Policy carefully before accessing, browsing, creating an Account or using the Website and/or any of the Products or Services. It is intended for the reader of this Privacy & GDPR Policy to have an understanding of and accept the Company’s Terms and Conditions. Your access to and use of the Website is conditioned on your understanding of and compliance of this Privacy & GDPR Policy.

1. Scope

- 1.1. This Privacy Policy applies to the Company Website, Products and Services.
- 1.2. Please note that all User access and use of the Company Website, Products and Services conveys consent to the collection, storage, use and disclosure practices set out in this Privacy & GDPR Policy.
- 1.3. The Website Policies and legal documents may be changed or updated occasionally to meet the requirements and standards.
- 1.4. Users are encouraged to frequently visit the legal sections of the Website in order to be updated and remain informed about changes.
- 1.5. Modifications will be effective on the day they are posted.

2. Personal Information Collection

- 2.1. The Company may collect and use the following kinds of personal information for an indefinite period of time information about your use of this Website, Products and Services including frequency of use, duration of use, and particular areas of interest such as pages viewed, purchase history, wish list, hyperlinks clicked, and other actions you take on our Sites. Website may also track URL that you visited that led you to the



Website, URL to which user goes next, and user Internet Protocol (IP) address or the nature of Website.

2.2. Personal Information the Company may collect from Users includes, but is not limited to;

2.2.1. Personal Identification Information: Full name, date of birth, age, nationality, gender, signature, utility bills, photographic identification, phone number, home address, email address, government issued identification and any other relevant contact details.

2.2.2. Blockchain wallet address(es).

2.2.3. Blockchain network information related to transactions and as a result of your interaction with the Platform.

2.2.4. Suitable Formal Identification Information: Tax ID number, passport number, driver's license details, national identity card details, photograph identification cards, and/or visa information.

2.2.5. Online Identifiers: Geo location/tracking details, browser fingerprint, OS, browser name and version, and/or personal IP addresses.

2.2.6. Usage Data: Survey responses, information provided to our support team, public social networking posts, authentication data, security questions, user ID, click-stream data and other data collected via cookies and similar technologies.

2.2.7. Any other relevant personal information, available through the users' browsers.

2.3. The Website uses "cookies" in combination with similar automated techniques to collect and store information obtained from your use. A cookie is a small data file that is transferred from your device (*e.g. your phone or your computer*) for record keeping purposes.

2.3.1. For example, a cookie may allow the Company to recognize your browser, while another could store your preferences and other information.

2.3.2. You may have an option and chose to decline the use of cookies but this will affect the parts of the site and services, or they may not work at all.



- 2.4. The Company Website and services may incorporate third-party advertisements and any third-party content on its Website, Products or Services. Such third parties may collect information about you or your online activities across other Websites and over time through your use of our Website. These will be subject to privacy policy of such third parties. However, all credit/debit cards details and personally identifiable information will not be stored, sold, shared, rented or leased to any third parties.
- 2.5. Some of the advertisements you see on the Website are selected and delivered by third parties, such as ad networks, advertising agencies, advertisers, and audience segment providers. These third parties may collect information about you and your online activities, either on the Website or on other Websites, through cookies, web beacons, and other technologies in an effort to understand your interests and deliver to you advertisements that are tailored to your interests. Please remember that we do not have access to, or control over, the information these third parties may collect. The information practices of these third parties are not covered by this privacy policy.
- 2.6. The Platform may require the use of a wallet and may obtain additional information from the wallet address related to the blockchain address and transactions.
- 2.7. The blockchain and other public blockchains provide transparency into transactions and the Company is not responsible for preventing or managing information broadcasted on a blockchain.

3. Information Collection

- 3.1. The Company may Collect and Use your personal information for a variety of commercial purposes, including but not limited to:
 - 3.1.1. Administer this Website, Products and Services,
 - 3.1.2. Promote our Products and Services to you,
 - 3.1.3. Personalize the Website, Products and Services for your use,
 - 3.1.4. Enable your access to and use of the Website, Products and Services,
 - 3.1.5. Publish information about you on the Website and for general marketing and promotional purposes,
 - 3.1.6. Send to you services that you transact on, win through a competition and promotion through the use of the Website, Products and Services,



- 3.1.7. Collect payments from you,
- 3.1.8. Send you marketing communications,
- 3.1.9. Send email communications, any newsletters, and other correspondence to which you subscribe,
- 3.1.10. Information about the computer (or other electronic device) that you use to connect to us with, the operating system it uses, your IP address, geographical location, the type of browser you use, application type, and referral source, as well as information relating to which Internet service provider or mobile network you use,
- 3.1.11. Data about how you use the site such as the number of page views, the particular pages and links you access when you visit the site, the specific time you access the site and the amount of time you are on it, the Website you came to our site from, the Website you visit after leaving our site, and any selections or choices you make when using the site,
- 3.1.12. Your individual preferences, your selections and any comments or feedback that you choose to leave on our pages,
- 3.1.13. Your reviews and ratings on our Products and Services,
- 3.1.14. Payment and transaction information including information relating to any purchases you make of our goods or services.
 - 3.1.14.1. We will keep records of the Products and services you purchase from us and the payment method that you use to complete the transaction,
- 3.1.15. Personal information such as the information that you provide to us for the purpose of registering with us, demographic data that you enter via forms on our site, information that you provide us with when you enter a competition or promotion, and information that you provide us with when you communicate with us via email or mail; and finally information that you provide us with when you purchase from us. This information includes your name, your email address, your telephone number and addresses associated with your account,
- 3.1.16. Information that you provide to us for the purpose of subscribing to our Website services, email notifications and/or newsletters,



3.1.17. Any other information that you choose to send to us either via fax, mail or email, or through any other electronic file transfer or storage service.

4. Information we Use

4.1. We use the types of information we obtain from you in the following ways:

- 4.1.1. To process your order or transaction,
- 4.1.2. To contact you about your purchases,
- 4.1.3. To communicate with you in reply to any complaints, issues, requests you make including any quotation requests,
- 4.1.4. To send you or deliver your purchases,
- 4.1.5. To send you quotations, invoices, statements,
- 4.1.6. To provide third parties such as couriers and delivery service agents in connection to delivering your order,
- 4.1.7. Establish and maintain a responsible commercial relationship with you,
- 4.1.8. Conduct surveys and get feedback from you,
- 4.1.9. Provide information to you about developments and new products, including changes and enhancements to the Website,
- 4.1.10. Understand your needs and your eligibility for the services provided in the Website,
- 4.1.11. Inform you about lending and financing features,
- 4.1.12. Provide our services efficiently and effectively,
- 4.1.13. Develop, enhance, market and deliver products and services to you,
- 4.1.14. Provide information to you about developments and new products, including changes and enhancements to the Website,
- 4.1.15. Process billings and collection of any fees,
- 4.1.16. Meet the Company's legal and regulatory requirements, including, but not limited to, information required to verify your identity,



- 4.1.17. To provide to third parties such as advertises, marketers and other service agents for the purpose of gathering and analysing statistical information about usage on our site. This information will not personally identify you,
- 4.1.18. To improve your use, navigation and browsing experience on our Website,
- 4.1.19. To send you information regarding any listing or services we think may be of interest to you,
- 4.1.20. To send you our newsletter and any marketing material,
- 4.1.21. To notify you of upcoming competitions and promotions,
- 4.1.22. We will use information about fraudulent or criminal activity relating to your account for the purposes of preventing fraud or crime.

5. Information we Share with Third Parties

- 5.1. The Company is committed to protecting your privacy. The Company's systems and data are constantly under review to ensure that you are getting the best class of service and that market leading security features are in place.
 - 5.1.1. The Company reserves the right to retain and share certain personal information in order to meet our regulatory and statutory requirements and further to our contractual agreements with partners and third parties.
- 5.2. We may share your information with the following third parties:
 - 5.2.1. Our subsidiaries and holding companies,
 - 5.2.2. Couriers and delivery service agents in connection to delivering your order,
 - 5.2.3. Buyers and prospective buyers of our business or any asset part which we are selling,
 - 5.2.4. Third parties such as law enforcement, government, regulators and other parties for legal reasons who we are under a legal obligation to disclose your personal information to,
 - 5.2.5. To third parties in order to exercise or defend our legal rights, property or safety or the rights, property or safety of others. This also includes disclosure of your personal information to others for the purposes of detecting and investigating illegal activities and breaches of any agreement we have with you,



5.2.6. To our advertising partners and marketing services agents who we enlist to advertise and promote Products, competitions and special promotions. We will not without your express consent provide your personal information to any third parties for the purpose of direct marketing,

5.2.7. To providers of statistical services for the purposes of collating statistical information about our users and their behaviour. Our users cannot be personally identified from this information.

6. Payment Information

6.1. The Company uses a third party to process and verify credit cards for billing purposes. This requires us to share user name, credit card number, expiration date and billing address with the credit card processing company.

6.2. When processing a payment transaction, The Company will also obtain information regarding the amount of the payment and other transaction data.

6.3. We may transfer or disclose this payment information to a third party only to the extent necessary in order to complete the payment processing or as lawfully required.

7. Disclosure of Personal Information

7.1. We use the Personal Information for the purposes indicated at the time you provide us with such information, and/or otherwise for the purposes set out in this Privacy Policy and/or as otherwise permitted by law.

7.2. We may make available the Personal Information that you provide to us to our affiliates, agents, representatives, service providers and contractors for these purposes.

7.3. We reserve the right to disclose Personal information that the Company believes, in good faith, is appropriate or necessary to enforce our Terms of Use, take precautions against liability or harm, to investigate and respond to third-party claims or allegations, to respond to a court order or official requests, to protect security or integrity of the Company and to protect the rights, property or safety of Composable, our users or others.



- 7.4. We may share Users' Personal Information with any financial dispute resolution scheme to which the Company subscribes, and other law enforcement bodies, regulatory agencies, courts, arbitration bodies and dispute resolution schemes, as may be required by law.
- 7.5. Except where disclosure of your Personal Information is required by law or requested by you, we will generally require any third party which receives or has access to Personal Information to protect such Personal Information and to use it only to carry out the services they are performing for you or for us, unless otherwise required or permitted by law.
- 7.6. We will ensure that any such third party is aware of our obligations under this Privacy Policy and we will take reasonable steps to ensure that contracts we enter with such third parties binds them to terms no less protective of any Personal Information disclosed to them than the obligations we undertake to you under this Privacy Policy or which are imposed on us under applicable data protection laws.
- 7.7. In the event that Composable is involved in a merger, acquisition, sale, bankruptcy, insolvency, reorganization, receivership, assignment or the application of laws or change of control, there may be a disclosure of your information to another entity related to such an event.

8. Access to, and changing of Personal Information

- 8.1. You have the right to access the Personal Information we hold about you, and to require the correction, updating and blocking of inaccurate and/or incorrect data by sending an email to us.
- 8.1.1. The Company shall respond to the request within 14 days.
- 8.2. You have the right to request the deletion or destruction of your Personal Information, your Account details or your Transaction details by sending an email to us.
- 8.3. The Company shall act on your request(s) only if they are not inconsistent with its legal and regulatory obligations and compliance procedures.
- 8.3.1. Upon your written request, we will inform you of the use and general disclosure of your Personal Information.
- 8.3.2. Depending on the nature of your request, there may be a minimal charge for accessing your Personal Information.

9. Transaction Information



9.1. For all Users, we collect all transaction information, for example, order activity.

9.2. This transaction data is monitored for suspicious trading activity for user fraud protection, and legal case resolution.

10. Securing your Data

10.1. The Company will take reasonable organisational and technical precautions to prevent the loss, alterations or any misuse of your personal information.

10.2. The Company Website, Products and Services; while storing your data will take all commercially reasonable steps in storing all personal information you provide on its secure servers.

10.3. Information relating to electronic transactions entered into via this Website will be protected by proper encryption technology that consistent with industry best practices.

10.3.1. Notwithstanding the foregoing, please note that our Website, Products and Services are operated on software, hardware and networks, any component of which may, from time to time, experience breaches of security or other problems beyond our control and that may compromise the security of information collected about our users.

10.4. The Company cannot guarantee that any information will be absolutely safe from intrusion by others who do not have your authorization because of the tricky nature of internet itself and role of other third-parties. Any such transmission of information about you to the Company is at your own risk.

11. Cross-border Data

11.1. Information that the Company collects may be stored and processed in and transferred between any of the countries in which the Company operates to enable the use of the information in accordance with this privacy policy.

11.2. In addition, personal information that you submit for publication on the Website for the public will be published on the internet and may be available around the world.

11.3. Personal information and other related data may be exported outside of the jurisdiction in which you reside, and they may be processed and stored in a foreign country or countries.



11.3.1. Under those circumstances, the governments, courts, law enforcement or regulatory agencies of that country or those countries may be able to obtain access to your Personal Information through foreign laws.

11.4. You need to be aware that the privacy standards of those countries may be lower than those of the jurisdiction in which you reside

11.5. You agree to such cross-border transfers of personal information.

12. Records

12.1. The Company reserves the right to monitor all online sessions and exchanges of all Users, for quality control purposes and for Technical Support perspective, in addition to all other purposes as needed by the Company.

12.2. The Company may record on-line and off-line communications conducted in any capacity or form with reference to assisting in resolution of disputes and/or potential complaints.

12.3. All records will also be used to improve the Service, build a support knowledge base, and/or conduct internal market research. Recorded data will not be correlated with personally identifiable data about individual customers.

13. Cookies

13.1. A cookie is a message given to a web browser by a web server. The browser stores the message in a text file. The main purpose of cookies is to identify users and possibly prepare customized Web pages for them. Use of a cookie by the Website is in no way linked to any personally identifiable information while on our site and will not infringe on the privacy of our customers.

14. Consent

14.1. Consent is required for the collection of Personal Information and the subsequent use of disclosure of Personal Information.

14.1.1. The form of consent may vary depending upon the circumstances and the type of Personal information obtained.



14.2. Your agreement with the terms herein constitutes your consent to the collection and use of Personal Information as agreed herein.

14.3. The Company reserves the right to use and disclose Personal Information without your knowledge or consent as permitted by applicable law.

15. Minors

15.1. Our Websites are not intended to appeal to persons under 18 years old (“Minors”). The Company Website, services will take appropriate steps to delete any unauthorised private information of a child has been collected, if it is discovered that such has been inadvertently collected.

15.2. All Users must be at least 18 years of age to register for a Company User membership.

15.3. All Users that represent that they are at under the age of majority in their state, province or country of resident require signed consent from their Legal Guardian.

16. Security

16.1. This Website takes every precaution to protect the information of users. When the user submits sensitive information via the Website, user information is protected both on-line and off-line.

16.2. When our registration form asks the user to enter sensitive information (such as credit card number), the information is encrypted and is protected with the best of the encryption software.

16.3. The Company continually monitors the Website and any corresponding Websites, ensuing all matters are dealt with, and everything is secure and protected. If we suspect anything then we will urgently pass any relevant information to the law enforcement.



16.4. All employees are required to be up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added.

16.5. The servers that we store personally identifiable information on are kept in a secure environment. In situations that are required by law, we may disclose some information about our users to law-enforcement officers.

17. Scam Prevention

17.1. The Company holds no Responsibility or Liability in the case of any scam.

17.2. No User should communicate or use any methods outside of the Website and general company's systems, as to prevent scams.

17.3. With common sense, usage of online sources and preventive measures, you should be able to be safe online.

18. Third party links

18.1. From time to time we may include links on our Website to third parties such as our partners, service providers, stockists, retailers and affiliates. If you choose to click on these links please note that we are not responsible or liable for their policies. It is your responsible to read their policies before you choose to engage with those Website.

18.1.1. We do not control those third party sites or any of the content contained therein and you agree that we are in no way responsible or liable for any of those third party sites, including, without limitation, their content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to or arising from those sites.

19. Identity Theft

19.1. The Company holds no responsibility or liability in the case of any Identity Theft.



19.2. No User should Communicate or use any methods outside of the Website systems, as to prevent scams.

19.3. With common sense, usage of online sources and preventive measures, you should be able to be safe online.

20. Your Rights

20.1. By using our Website we assume your agreement to this Privacy & GPDR policy.

20.2. If you do not wish for your personal data to be used as set out in this policy, you may write to us at: Contact@Verticate.io.

GDPR POLICY

This GDPR section covers all Users natural rights arising from all related European GDPR Regulation, with emphasis on GDPR Article 12; Art. 12 GDPR Transparent information, communication and modalities for the exercise of the rights of the data subject, Article 13; Information to be provided where personal data are collected from the data subject and Article 14; Information to be provided where personal data have not been obtained from the data subject.

1. Users Data Protection Rights

1.1. Our Company wishes to ensure that all Users and Individuals subject to Data Collection have a full understanding of their rights and their entitlements;

1.1.1. Right of Access: All Users have the right to request copies of personal data.

1.1.1.1. The Company will charge you a small and reasonable fee for this service.

1.1.2. Right of Rectification: All Users have the right to request that our Company correct any information you believe is inaccurate.

1.1.2.1. Users also have the right to request that the Company complete any information the User believes is incomplete.



1.1.3. Right to Restrict Processing: Users have the right to request that the Company restrict the processing of Personal data, under certain conditions.

1.1.4. Right to Object to Processing: Users have the right to object to the Company's processing of the Users personal data, under certain conditions.

1.1.5. Right to Data Portability: Users have the right to request that the Company transfer all personal data collected to another organization, or directly to the User, under certain conditions.

1.2. Upon a User making a request, the Company reserves the right to respond within 1 (*one*) month of receiving notice.

1.3. To exercise you GDPR rights please feel free to contact us immediately.

2. Cookies

2.1. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our Website, we may collect information from you automatically through cookies or similar technology

2.2. The Company uses cookies in a range of ways to improve your experience on our website.

2.3. For further information, read our dedicated Cookies Policy.

3. External Websites & GDPR

3.1. The Company Website may contain links to other Websites, our GDPR Policy applies only to the Company Website.

3.1.1. Upon clicking on a link to an External Website, all Users should read their legal policies.

4. Updates

4.1. Our Company keeps its GDPR Policy under regular review and places any updates on this web page.

4.2. This GPDR Policy was last updated on 27th July 2023.



5. Contact

5.1. Users can contact the Company at any time using the dedicated Contact sections on the Website if they wish to exercise any of their rights.

