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Palmex Exchange Limited Privacy Notice

This Palmex Exchange Privacy Notice (“Notice”) outlines how we manage the Personal Data we hold. Palmex Exchange Limited is your data controller. We may share your data with ArabianChain Technology LLC in (who are our Administrators, and act as our processor of personal data) as well as other related corporations and affiliates based in Kingdom of Bahrain , who provide Compliance related services to ArabianChain Technology Group Companies, in accordance with this Notice.

Palmex Exchange , ArabianChain Technology LLC & other related corporations and affiliates (referred to hereunder as “Palmex Exchange ”, the “Palmex Exchange ”, “we”, “us” or “our”) collectively or singularly as the context requires, recognize the importance of protecting Personal Data. We respect the confidentiality of Personal Data and privacy of individuals and are committed to complying with the General Data Protection Regulation 2016/679 (“GDPR”), the UK Data Protection Act 2018 and other applicable data protection laws. Please read this Notice so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

In the course of providing our services, we may engage in collecting, using, storing, processing, disclosing and sharing amongst ourselves your Personal Data as data controllers, and disclosing such Personal Data to our authorised service providers and relevant third parties as appropriate in the manner set forth in this Notice. By accessing and using any websites of the Palmex Exchange , interacting with us, or providing your data to us, and

subject to your rights at law, you acknowledge and agree to these terms and conditions without any limitation or qualification. If you do not agree with any aspect of this Notice, you should immediately discontinue access or use of our website and services.

This Notice supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data. This Notice does not affect any rights which we may have at law in connection with the collection, use or disclosure of your Personal Data.

We may from time to time update this Notice to ensure that this Notice is consistent with our 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 Notice as updated from time to time on our website at <https://palmex.ae/en/terms>. Please check back regularly for updated information on the handling of your Personal Data.

1. Your Personal Data

1.1. "Personal Data" refers to any data or information about you from which you can be identified either (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Examples of such Personal Data which you may provide us include (depending on the nature of your interaction with us):

a) your name, date of birth, nationality, passport number or other identification number, telephone number(s), mailing address, email address, photograph (including any 'selfies') and any other information relating to you which you have provided us in any form you may have submitted to us, or in other forms of interaction with you;

b) information about your use of our websites and services, including cookies, IP addresses, transaction details, subscription account details and membership details;

c) proof of your address of residence (including as indicated in your utility or credit card bills); and

d) your payment related information, such as your bank account or credit card information, and your credit history.

2. Collection of Personal Data

2.1. Generally, we collect your Personal Data in the following ways:

a) when you submit forms relating to any of our products or services, or submit any online queries;

b) when you register for or use any of our services on websites owned or operated by us or when you register as a member of websites owned and/or operated by us;

- c) when you interact with our customer service officers or any of our staff, for example, via face-to-face meetings, telephone calls, letters, online forms (such as any “Contact Us” forms on our websites), social media platforms and emails;
- d) when you use or purchase our services or products;
- e) when you apply for and establish any online accounts with us;
- f) when you carry out transactions on our platform or our services;
- g) when you request that we contact you;
- h) when you respond to our request for additional Personal Data;
- i) when you ask to be included in an email or other mailing list;
- j) when you respond to our promotions and other initiatives;
- k) when you respond to our market surveys;
- l) when you submit a job application;
- m) when we receive references from business partners and third parties, for example, where you have been referred by them;
- n) when you submit your Personal Data to us for any other reason; and
- o) when you browse our website. Please refer to the Use of Cookies section below at paragraph 7 for more information.

2.2. We may monitor or record phone calls, your usage patterns and customer-facing interactions for quality assurance, employee training and performance evaluation, identity verification purposes, feedback, respond to your queries and requests and resolve complaints and other related purposes.

2.3. Where you provide Personal Data of a third party (e.g. information of your dependent, spouse, children and/or parents) to us, you represent and warrant that all necessary consents of that third party has been obtained for the collection, use and disclosure of the Personal Data for the purposes set out above and that you have provided a copy of this Privacy Notice to them.

3. Use and Disclosure of Personal Data

3.1. Our business is to understand and meet your needs and provide you with the products and services that you require. To do this effectively, we need to collect a range of Personal Data about you.

3.2. In general, we use and disclose your Personal Data for the following purposes:

a) as necessary for the performance of our contract with you to provide you with the products or services that you have requested;

b) to help us review, develop, improve, manage the delivery of and enhance our products and services, including analysing future customer needs, conducting market research and data analytics;

c) to communicate with you and respond to your queries, requests and complaints;

d) to provide ongoing information about our products and services which may be of interest to you;

e) to handle disputes and conduct and facilitate investigations and proceedings;

f) to protect and enforce our contractual and legal rights and obligations;

g) to prevent, detect and investigate crime, including fraud and money-laundering, and to analyze and manage other commercial risks (including via anti money-laundering (AML), counter-terrorism financing (CTF) and know-your-customer checks);

h) to manage our business operations and to comply with internal policies and procedures;

i) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any Palmex Exchange entity; and/or

j) to comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities.

3.3. In addition, we may use and disclose your Personal Data for the following purposes, depending on the nature of our relationship with you:

a) If you have an account with us:

(i) to process your application for the account;

(ii) to maintain your account with us;

(iii) to provide you with the goods and services which you have signed up for (including to facilitate and process crypto-related transactions and to seek your authorisation for such transactions);

(iv) to verify your personal particulars and process payment requests in relation to provision of the services which you may be entitled to or which you may have requested for;

(v) to communicate with you of changes and development to our policies, terms and conditions and other administrative information, including for the purposes of servicing you in relation to products and services offered to you;

(vi) to resolve complaints and handle requests and enquiries;

(vii) to carry out periodic screening on your transactions (including screening upon onboarding);

(viii) to carry out on-chain due diligence;

(ix) to conduct market research for statistical, profiling and statistical analysis for the improvement of services provided to you (including through the use of server log or device information); and/or

(x) to process your Personal Data in relation to any of the purposes stated above.

b) If you are a vendor, a prospective vendor or a contractor:

(i) to evaluate your proposals and to conduct background checks on you;

(ii) to communicate with your deployed staff after award of contract who are providing products or services to us, and for any emergency or/and security concerns; and/or

(iii) any other purpose directly relating to any of the above.

c) If you are an applicant for funding or initiatives provided by ArabianChain Technology or any Entity :

(i) to process your application including KYC, AML/CTF checks;

(ii) to provide or to obtain references for background screening/vetting;

(iii) to collect information about your suitability for the position applied for;

(iv) to assess your performance;

(v) to administer benefits and provide funding to you;

(vi) to communicate with you to coordinate the running of our initiatives, and to comply with our policies and processes, including for business continuity purposes; and/or

(vii) any other purposes relating to the aforesaid.

d) If you submit an application to us as a candidate for employment:

(i) to process your application including pre-recruitment checks;

(ii) to provide or to obtain opinions or references for background screening/vetting from third parties; and/or

(iii) to collect information about your suitability for the position applied for, including past employment, professional qualifications and education, immigration and residential status and any other details about you which may be gathered during the recruitment process.

We may also review publicly available information about you on your social media accounts.

3.4. The above purposes are not exhaustive, and depending on the nature of your relationship with us, we may collect, use and disclose your Personal Data for additional purposes which you will be notified of, in accordance with applicable terms and conditions.

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3.6. In addition, where you have provided us with specific consents, we may also use and disclose your Personal Data for the following purposes:

a) providing services and extending benefits to you, including promotions, reward programmes, and sending you industry market updates, newsletters and other information on our products, services, offers or promotions which may be of interest to you;

b) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by us or third parties;

c) administering contests, competitions and conducting lucky draws, including, where necessary, announcing the results of these contests, competitions and lucky draws and identifying and contacting the winners; and

d) conducting market research to understand and determine customer locations, preferences and demographics for us to develop special offers, promotional and/or marketing programmes.

3.7. In relation to particular products or services or in your interactions with us, we may also notify or have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

3.8. If you have provided your contact details (for example, telephone number, mobile number, postal address or email address) and have indicated that you consent to receiving marketing or promotional information, then from time to time, we may contact you using such contact details (including via voice calls, text, fax, email or other means) with information about our products and services (including discounts and special offers). You have the right to withdraw your consent for us to use this information for this purpose. If you wish to do so, please contact us at the details provided in paragraph 10.

3.9. Your Personal Data will be protected and kept confidential, but subject to the provisions of any applicable law, your Personal Data may, depending on the products or services concerned, be disclosed to the following third parties:

a) transaction counterparties;

b) other divisions or entities within the Palmex Exchange or ArabianChain Technology Group ;

c) our joint venture/ alliance partners and business partners;

d) our agents, contractors, vendors, third party service providers and specialist advisers who have been contracted to provide us with administrative, financial, research, operational, IT or other services, such as telecommunications, information technology, payment, processing, training, market research, storage and archival;

e) any third party business partners who offer goods and services or sponsor contests or other promotional programmes, whether in conjunction with us or not;

f) insurers or insurance investigators and credit providers;

g) in the event of default or disputes, any debt collection agencies or dispute resolution centres;

h) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving the Palmex Exchange or ArabianChain Technology Group ;

i) our professional advisors such as our auditors and lawyers;

j) relevant government regulators or authority or law enforcement agency to comply with any laws or rules and regulations imposed by any governmental authority;

k) anyone to whom we transfer or may transfer our rights and obligations;

l) banks, credit card companies and their respective service providers; and

m) any other party as may be consented to by you, as specified by that individual or in the applicable contract.

4. Keeping Your Personal Data Accurate and Up-To-Date

4.1. We endeavor to ensure that all Personal Data we have about you is accurate and up-to-date. We understand that this information changes frequently with changes of address and other personal circumstances. We encourage you to contact us as soon as possible to enable us to update any Personal Data we have about you in accordance with paragraph 10. Incomplete or outdated Personal Data may result in our inability to provide you with products and services you have requested.

5. Transfer of Data

5.1. The personal data that we collect from you may be processed or shared with Palmex Exchange or ArabianChain Technology Group Companies, or third party affiliate in a country or territory outside your home country, including outside the European Economic Area ("EEA").

5.2. Where we transfer your data to another jurisdiction which does not offer the same level of protection of personal data as may be enjoyed by your home jurisdiction, we will ensure that your data is appropriately protected.

6. Retention Periods

6.1. We will retain your personal data for as long as necessary in order to fulfil the purpose for which it was collected, as well as for periods as required by our legal or regulatory obligations. In some cases, this may mean that data is kept once the purpose for holding that data has completed.

7. Use of Cookies

7.1. When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our server to recognize a return visitor as a unique user including, without limitation, monitoring information relating to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).

7.2 Cookies are small text files stored in your computing or other electronic devices which allow us to remember you or other data about you. The cookies placed by our server are readable only by us, and cookies cannot access, read or modify any other data on an electronic device. All web-browsers offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.

7.3 Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

8. Third-Party Sites

8.1. Our website may contain links to other websites operated by third parties, such as our business partners. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Once you have left our website, you should check the applicable privacy Notice of the third-party website to determine how they will handle any information they collect from you.

9. Your rights

9.1. You have the following rights (which are subject to a number of exceptions and exemptions) in respect of your personal data:

(i) the right to access and "port" personal data;

(ii) the right to rectify personal data;

(iii) the right to restrict the use of personal data;

(iv) the right to request that personal data is erased; and

(v) the right to object to processing of personal data;

9.3. Where we have relied on consent to process your personal data, you have the right to withdraw consent at any time. Should you exercise your right to withdraw consent or to object to the processing of personal data it may impact on our ability to provide services to you.

9.4. If you wish to exercise any of the rights set out in this paragraph 9, please contact us as set out below in paragraph 10.

10. How to contact us

10.1. If you have any questions about this Notice or any complaints relating to your Personal Data, or you would like to obtain access and make corrections to your Personal Data records (for which we may charge a fee to cover the cost of verifying the application and locating, retrieving and copying any material requested), please contact Jon Day, Data Protection Officer by writing to us at email address: info@palmex.ae.

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