Blockchain Technical PRIVACY POLICY

GENERAL

This Blockchain Technical Privacy Policy of the web platform belonging to Blockchain Technical L.L.C.-FZ (**Company**, we, us, our), located at <u>https://emcd.ae</u> and all sub-domains (**Platform**).

The Company is the primary data controller for individuals and legal entities (**User**, **you**, **yours**) who access and use the Services of the Company and its Partners through the Platform.

This Privacy Policy sets out the basis for processing any Personal Data (*as defined below*) collected from you through the Platform or other means about your use of the Platform.

This Privacy Policy uses terms and definitions specified in the general Terms of Service (**General Terms**).

ACCEPTANCE OF THIS POLICY

If you agree to all and any of the Privacy Policy provisions, you can accept it by placing \square next to the box "*I have read and accept the terms of the Privacy Policy*" during your Account registration within the Platform.

If you do not agree with any provision of this Privacy Policy, you shall immediately stop using the Platform.

DEFINITIONS

"*Account*" means the User's personal webpage on the Platform, which the User can only access with the corresponding login-password pair. The User uses the same Account to access the Services of Partners.

"*Company*" or "*we*" means Blockchain Technical L.L.C.-FZ, a private legal entity registered under the laws and regulations of UAE, reg. No.: 2418630, addressed at Meydan Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai, U.A.E.

"*Partners*" means the legal entities that provide the Services through the Platform and are directly mentioned as providers under the General Terms.

"*Personal Data*" generally means any information that relates to an identified or identifiable living individual that Users provide our Partners or us through and(or) within the Platform, information which is collected about you automatically by us or our Partners, the information you shared with our Partners or us per KYC/AML Verification and communication purposes, as well as information that we or our Partners obtain from third parties.

"*Platform*" means a set of information, web forms, software, hardware, and intellectual property objects (including computer software, database, graphic interface design, content, etc.) that can be accessed from various User devices connected to the Internet through special web browsing software (browser) at "https://emcd.ae" domain, including domains of the following levels, to get access to the Services.

"*processing*" means a wide range of operations performed on Personal Data, including by manual or automated means the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

"Services" means the overall services the Company and its Partners offer through the Platform.

What Personal Data Do We Collect?

As a rule, the Platform can be used without providing any Personal Data. We collect Personal Data about you when you use Services or reach out to us or our Partners somehow. We collect your Personal Data directly received from you, such as:

- (a) Country;
- (b) E-mail;
- (c) Phone number;
- (d) Telegram ID;
- (e) Our Partners or we request other information and your Personal Data or you deem necessary to submit to us or our Partners during communication through the Platform.

Among other cases, we or our Partners may collect your Personal Data when you:

- Visit the Platform;
- Use the Platform;
- Contact us.

During your use of the Platform, we or our Partners may collect the following Personal Data:

- Information about your identity, including your name, country, email, and other information and your Personal Data you deem necessary to submit to us during communication through the Platform;
- Information about your actual address and residency;
- Cryptocurrency transaction information;
- When you visit the Platform, including your location information, IP address, and any thirdparty Platforms you access;
- Other personal information, such as details of your interactions with us.

How Do We Collect Your Personal Data?

Direct Collection

In most cases, we and(or) our Partners collect the Personal Data directly from you when you submit it through the Platform. This includes contact information, registration information, and Services inquiries. If you do not want to share your Personal Data, you can choose not to use a particular Service.

Indirect Collection

We and our Partners use cookies and local device storage to offer and provide personalized services. We and our Partners may use these technologies to:

- Provide you with customized content based on your use of the Platform;
- Enable you to use the Platform more easily by remembering and using contact information, purchasing information, and registration information;
- Evaluate, monitor, and analyze the use of the Platform and its traffic patterns to help improve the Platform and services and perform monitoring requirements under the AML/CTF laws and regulations;
- Assist us with ad reporting functions, such as learning which ads are bringing users to the Platform.

The types of technologies used for the indirect collection within the Platform are the following:

A. Cookies

A cookie is a small amount of data sent to your browser from a Web server and stored on your computer's hard drive.

Cookies enable us and our Partners to identify your browser as a unique user. Cookies may involve transmitting information from us to you and from you to us. Cookies may also be used by another party on our behalf to transfer data to us by their privacy policy.

There are persistent and session cookies. Persistent cookies are used by us each time you access the Platform. While session cookies, also called "session variables", are used only during a specific browsing session and expire after a pre-determined amount of time. Session cookies, for example, can be used to remember that you have already navigated through a particular menu.

We and our Partners may also use "analytics cookies" that allow web analytics services to recognize your browser or device and, for example, identify whether you have visited the Platform before, what you have previously viewed or clicked on, and how you found the Platform. This information is provided anonymously for statistical analysis only. Analytics cookies are usually persistent cookies. You may turn off browser cookies in your browser or set your browser to warn you when a cookie is being sent. You may lose some features or functionality when you turn off cookies. Remember, also, that disabling cookies is browser-specific.

B. Log Files

Like most standard Platform servers, we and our Partners use log files.

Log files track Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. We and our Partners utilize this information to analyze trends, administer the site, prevent fraud, track Platform navigation in the aggregate, and gather broad demographic information for aggregate use.

How Do We Use Your Personal Data?

We and our Partners are careful about how we use your Personal Data. Our Partners and we use it to deliver Services. Our Partners and we also use your Personal Data for other reasons, such as to understand you and your needs better and to let you know about other products and services you might be interested in.

Our Partners and we collect, use, and exchange your Personal Data to:

- Assess your application for different issues;
- Design, manage, price, and provide the best Services experience;
- Manage our relationship with you;
- Minimize risks and identify or investigate fraud and other illegal activities;
- Contact you;
- Improve Services;
- Comply with laws and assist government or law enforcement agencies;
- Manage our businesses.

Our Partners and we use the Personal Data only for the purposes stated in this Privacy Policy and retain such data as far and as long as necessary.

To Whom Do We Disclose Your Personal Data?

We may disclose Personal Data collected from Users and visitors to our Partners, affiliates, and independent contractors with whom we cooperate to enable you to use an aggregate of the Services through the Platform.

We may also disclose aggregate information on the use of the Platform in an anonymous form to investors and potential partners.

In certain instances, we or our Partners may also be required to disclose your Personal Data to law enforcement authorities in response to a valid emergency disclosure request. We or our Partners may share your Personal Data with law enforcement, data protection authorities, government officials, and other authorities when:

- Compelled by court order or other legal procedure;
- Disclosure is necessary to report suspected illegal activity.

Overall, we will not disclose any of your Personal Data except when we have your permission or under special circumstances, such as when we believe in good faith that the law requires it or under the circumstances described below.

How Long Do We Store Your Personal Data?

We and our Partners store your Personal Data as long as it is required:

- To render your Services;
- To comply with the respective legislation.

Where Do We Store Your Personal Data?

Our Partners and we store all the Personal Data on our own protected servers.

In case the local laws of your jurisdiction require local storage of the Personal Data, we will store your Personal Data on the servers located therein.

The processing of Personal Data is performed following privacy rights and regulations following the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486) as amended (**PDPO**) and EU General Data Protection Regulation (GDPR) and other local regulations of our Partners.

Your Rights For the Personal Data

Your principal rights as the Personal Data subject include the following:

- 1. **Right to access Personal Data**. You may request us or our Partners to provide you with a copy of your Personal Data that we or our Partners can access. We or our Partners will provide you with such information within a reasonable period and may require you to compensate for the expenses of gathering the data.
- 2. **Right to Personal Data Rectification**. You may request us or our Partners to rectify or update any of your Personal Data. You can do this using relevant Platform functionality or by contacting us or our Partners directly. We and our Partners reserve the right to reject personal assistance where rectification of Personal Data is available through the Platform.
- 3. **Right to Personal Data Deletion**. Subject to applicable law, you may request us or our Partners to erase your Personal Data. Please note that we or our Partners will sometimes automatically delete your Personal Data when you close Your Account. If you close your Account, we will not use your Personal Data for any further purposes nor share it with third parties except as required by the law. Please note that we and our Partners may only sometimes be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.
- 4. **Right to Withdraw Consent**. To the extent the processing of your Personal Data is based only on your consent, you may withdraw your consent at any time. This will not affect the lawfulness of any processing which was carried out before the withdrawal. Please note that any processing activities not based on your consent will remain unaffected.
- 5. **Right to Restrict Processing**. In some jurisdictions, applicable law may give you the right to restrict or object to us or our Partners processing or transferring your Personal Data under certain circumstances. We may continue to process your Personal Data if necessary to defend legal claims or any other exceptions permitted by applicable law.

Kindly note that none of the aforementioned rights are absolute, meaning they must generally be weighed against our and our Partners' legal obligations and legitimate interests. If a decision is taken to override your request, a respectful party will inform you of this, along with the reasons for the decision.

You can use your rights by contacting us at <u>support@emcd.ae</u> or our Partners according to the information provided on the Platform.

Privacy Policy Amendments

We and our Partners reserve the right to amend, modify, update, and change any of the terms and conditions of this Privacy Policy for several reasons, including commercial and legal (to comply with new laws or regulations) without prior notice.

We will notify you of any such amendment, modification, or change by publishing the new version of

the Privacy Policy on the Platform. It is the responsibility of the Users to make sure that they are aware of the up-to-date Privacy Policy, and we advise you to check for updates regularly.

For more information about the Privacy Policy, please contact us at supper@emcd.ae or our Partners according to the information provided on the Platform.

Last amended on 10.01.2025