

Privacy Policy

Valid from 23.12.2022

This Privacy Policy describes the general principles on how ALF services UAB (registry code 305955832) address Kalvariju 125, Vilnius 08221, Lithuania (hereinafter "**ALF services**") processes Users' Personal Data and is applicable to any person who uses, has used or has expressed intent to use the Services of ALF services. ALF services is responsible for Processing your Personal Data. All of the definitions used in and all circumstances not covered by this Privacy Policy shall be regulated by the Terms and & Conditions of ALF services and/or Regulation (EU) 2016/679.

Your privacy is important to us. We are committed to protecting the privacy, confidentiality and security of the personal data we hold by complying with the requirements under applicable laws and regulations. We are equally committed to ensuring that all our employees, service providers, partners and agents uphold these obligations. This policy explains how we manage personal data within our organization, including how we process the personal data of the users of our website.

Please read this Privacy Policy before using the Site and/or Services or submitting your Personal Data.

1. Definitions

Here you can find the meanings of the most important terms in this Privacy Policy to help you understand who and for what we are Processing your Personal Data.

- **Agreement** - service agreement concluded with the Merchant, i.e. our client.
- **Cookie(s)** - small pieces of information stored by the Visitor's browser on the hard disk of the computer of any other device of the Visitor.
- **Personal Data** - means any information which ALF services directly relates to you (a legal or natural person or an organization legally engaged in business activities or any other business). In particular by reference to an identifier such as a name, date of birth, contact information, location data, an online identifier etc. Processing may be done manually or using automated systems.
- **Privacy Policy** - this privacy policy.
- **Processing** means any operation carried out with Personal Data (collection, recording, storing etc.).
- **Visitor** - is any person using the Website of ALF services.
- **Website** - www.myriadtrust.io

2. The content of Personal Data we Process

By agreeing to this Agreement or using the Services and/or the Website, you agree that the ALF services will use, disclose and process your personal information in accordance with this Privacy Policy:

- 1) ALF services Terms of Service and present Privacy Policy applies to communication between you and ALF services (incl. emails, phone calls, etc.) and to your use of the Website and Services and establishes the policy on which Personal Data will be processed by ALF services.
- 2) ALF services may process any information submitted, shared or exchanged to provide the Services. ALF services collects information by email, phone calls or by questionnaire or any other means. Some information may also be collected via automatic means, e.g. Cookies. ALF services may also collect information from third parties. ALF services shall do all that is reasonably possible to ensure the confidentiality of the Personal Data that ALF services has collected.

- 3) ALF services processes Personal Data only if it has your consent to do so, or if it is necessary for providing you the Services, or ALF services has the legitimate interest to do so, or if it is required by applicable legislation.
- 4) ALF services mainly processes data to comply with applicable laws, regulations and instructions, to manage the relationship between ALF services and you, to provide additional Services, to prevent illegal activities and misuse of the Service and Website, to ensure to quality of the Service and Website, etc.
- 5) You are required to provide your real name, address, nationality, telephone number, e-mail address, as well as other information as required by applicable laws and regulations. You can also choose to fill in additional information. By providing the previously mentioned information you understand and agree to that ALF services, will access your Personal Data (including but not limited to mobile phones, electronic mail, etc.) to send you relevant notices and other commercial electronic information to provide you with new Services and opportunities. ALF services will not share your Personal Data without your previous consent unless, we are legally obliged to.
- 6) ALF services collects some of the information automatically. Information that is collected automatically is associated with your use of the Services and/or the Website. ALF services may collect information (incl. IP address, operating system, browser ID, location, language settings, demographic information, Personal information, and other information about the interaction of you and the Website) about your usage or the Service and/or the Website. ALF services may use authorised processors and Services provided by third parties to collect and process data.
- 7) In order to ensure the safety of your use of the Services and the Website and to continuously improve the quality of service, ALF services will record and keep information about your login and use of the Service and the Website, but ALF services undertakes not to provide such information to any third party (unless otherwise agreed upon by both parties, or other laws and regulations).
- 8) ALF services will keep tight security of all the complete comprehensive statistics regarding identity data of ALF services users and will not use and/or disclose them for sale and reward. ALF services reserves the right to transmit the Personal Data to law enforcement institutions, state authorities and financial institutions if it should be required to comply with valid laws.

3. We collect personal data about you in the following ways:

- a. you provide us your personal data yourself (e.g. by registering for a ALF services customer Account by submitting a query, a request or an application to us;
- b. your personal data is provided to us by third parties who are entitled to disclose that information to us.
- c. we collect your data from public sources (e.g. by examination of public blockchains; from public registries; from your public social media profile).
- d. we collect your personal data by automatic means (e.g. tracking your use of our websites and mobile applications). See also below in our Cookie Policy how we use cookies and other similar technologies on our Website.

In some cases, we may be required by law to collect certain types of personal data about you.

Where we collect personal data from you, we will generally do so ourselves. However, in some cases we may collect personal data from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

4. Kind of personal data we collect and purposes and legal basis for the processing of personal data. We process your personal data on the following legal bases and for the following purposes:

- a. Processing on the basis of the performance of the contract between us. We mainly process your personal data to provide our products and services to you on the basis of the agreement we have concluded with you. This also includes providing customer support and contacting you otherwise as regards the Website or our products and services and taking steps prior to entering into an agreement with you (e.g. identifying you on the basis of your personal data we require and verify that you are allowed to use our products and services under our Services Terms of Use and any other relevant terms as set out by ALF services from time to time). For the foregoing, we process the personal data including the following:
 - Personal identification information (e.g. full name [first, any middle and second first and second last and last], date of birth, gender, ID documentation, passport numbers, Non-Signature IDs, utility bills, nationality, signature, photographs, employer, job title and tax ID number);
 - contact details (e.g. e-mail address, phone number, home and work address);
 - financial information (e.g. credit and debit card numbers, PANs, IBANs, bank account numbers and details, sort codes and other payment details, payslips);
 - communication data (e.g. records of our communications with you, including any messages you send us);
 - blockchain-related information (e.g. blockchain identifiers, such as blockchain addresses and public keys);
 - transaction information (e.g. transactions you make on our platform, including the name of the recipient, the amount of the transaction and the time stamp);
 - account log-in and usage data (e.g. emails and passwords that you create when registering for a ALF services Account, details of any products or services that we provide to you, survey responses, information provided to our support team, public social networking posts, authentication data, security questions, user IDs, click-stream data and other data collected via cookies and similar technologies);
 - online identifiers (e.g. geolocation, IP address, browser fingerprint, browser name and version and OS) and other information that may be present on documentation that we may ask you to provide for the purposes of proving your identity.
- b. Without this information, we may not be able to provide you with our products or services (or with all the features and functionality offered by our products or services) or to respond to queries or requests that you submit to us.
- c. Processing on the basis based on our legal obligation. We may also process your personal data to fulfill our obligations arising from the law, our AML and CTF obligations (e.g. properly identifying you, monitoring your use of our website, products and services, and transmitting data to supervisory authorities).
- d. Processing based on our legitimate interest. We process the data received from your use of the ALF services Services (e.g. information about how you move around on and use our website) to improve the user experience in using the website and the products and services. Improving our website, products and services includes carrying out market analysis and research, education and training programs for our staff and planning and forecasting business activities and other internal business processes. The legal basis for this is our legitimate business interest to improve the ALF services Services and the user experience and our business as a result thereof. Considering the nature of the data and that we use the data in an aggregated manner, your interests or fundamental rights and freedoms do not override our legitimate interest.

- e. We may also process your personal data to safeguard our rights (e.g. establishing, exercising and defending legal claims, debt collection). The legal basis for this is our legitimate interest to protect our legal rights and ensure the performance of the agreement concluded between us. In such case, your interests or fundamental rights and freedoms do not override our legitimate interests.
- f. To the extent required by applicable data protection regulation, you have the right to object to the processing of your personal data which is based on legitimate interest (see also section "Your rights" below).
- g. Processing on the basis of your consent. We may also process your personal data based on your consent (e.g. for direct marketing purposes, including sending you our newsletter or informative e-mails). When processing is based on consent, you can withdraw your consent at any time by clicking on the 'unsubscribe' link at the end of each e-mail. Please note that withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal. For specifications about how we use your personal data for direct marketing purposes, please see section "Direct marketing" below.

5. Disclosure and transfer of Personal Data

ALF services only processes your Personal Data on your consent, if there is a legitimate interest to process data or if it is required by valid legislation. In order to provide you with a more efficient service, you agree that ALF services shall have the right to provide your registered information which you have furnished to ALF services in the course of your registration and use of the Service. At the same time, ALF services reserves the right to require you to submit identity information (including but not limited to identity card, bank account book, passports, and other certificates or other documents). Except as otherwise provided in Terms of Service or present Privacy Policy, ALF services does not disclose or provide your information to third parties except in the following cases:

- with your explicit authorization;
- only to disclose your Personal Data in order to provide you with required products and/or Services;
- disclosure in accordance with the requirements of this Privacy Policy;
- according to the provisions of applicable laws and regulations;
- in accordance with the instruction and requirements of applicable laws and Authorities etc;
- for the maintenance of ALF services legitimate rights and interests;
- to verify the authenticity of the identity of you or your representative company.

6. Retention and security of Personal Data

We shall store your Personal Data for as long as required by law or in accordance with the law, or for the purposes stated in this Privacy Policy. Your Personal Data will be processed no longer than necessary. The retention period of your Personal Data may be based on the applicable law (e.g. Money Laundering and Terrorist Financing Prevention Act, etc.) or legitimate interest of ALF services or Agreements signed between you and ALF services. After the expiration of the Personal Data storage period, we shall anonymize or permanently erase your Personal Data. We take the appropriate technical and organisational security measures in protecting your personal data.

We retain your personal data for as long as is necessary for the purposes they were collected for, as long as necessary to safeguard our rights, or as long as required by the applicable law. We may retain your personal data for a number of years after the end of our relationship if it is necessary to safeguard our rights or required under the applicable law. If your personal data is being processed for several different purposes, the longest retention period shall apply.

In general, we store your personal data as follows:

- information on legal transactions between us is retained for as long the agreement between us is valid and for a period of 10 years as of when a claim falls due unless otherwise provided by law, asking you occasionally to update your personal data;
- billing information is retained for 7 years as of the end of the financial year in which the information was provided to us;
- cookies' information is retained according to our Cookie Policy below;
- all other data is retained for 5 years.

7. Cookies

Cookies are small files text files placed on your device when you visit a Website. We use Cookies on our Website, that you can accept if you choose to use our Website. ALF services places on your device only a session-ID cookie. The cookie is used to ensure that the source of a request to a server is the same as the one through which log-in occurred. Cookies allow us to recognize whether you have used the Service before and it helps us to store your preferences and other information.

Most of the web browsers allow Cookies. Without fully allowing Cookies, not all of the functions of the Website are available to a Visitor. The allowing or prohibiting Cookies and other similar technologies shall be under the control of a Visitor via the settings of the Visitor's own web browser. Most browsers allow you to control cookies, including turn off their acceptance by your device, through their settings' preferences. However, if you turn off the ability of your device to accept cookies, you may lose access to this Website and the Services provided via it.

If you prefer that your Personal Data will not be Processed on our Website, you can activate the private browsing feature of your web browser.

If you access this Website without changing your browser settings, ALF services will assume that you agree to receive the cookies which ALF services or third parties place into your device when you use this Website.

We use all the cookies, except the "essential" technical cookies, with your prior consent. You always have the right to withdraw the consent by changing your preferences via our website. Should technical cookies process your personal data, we rely on our legitimate interests in processing of such data (see the section above that explains our legitimate interests).

We use first-party cookies (i.e., the cookies which belong to us), but also third-party cookies (i.e., the cookies that belong to third-party service providers, such as Google).

We may use both session cookies and persistent cookies. Session cookies or non-persistent cookies are cookies that exist only temporarily while you browse our website. Your web browser should delete these cookies when you close your browser. On the other hand, persistent cookies that we use expire at a specific date or after a specific length of time set by the third-party or us.

For your convenience, we have categorized the cookies we use on our website by their purposes as follows:

Technical

We use this type of essential cookies to run our website properly, i.e., without these cookies our website would not function as it should. Due to the nature of such cookies, and as per applicable legislation, we have the right to use them without your prior consent. However, if these cookies process personal data, we rely on our legitimate interests upon processing of such data.

Analytical

We use this type of cookies to analyse how you use our website. We retain and evaluate information on your recent visits for statistical purposes, as well as to improve the functionality of the website and make it more user-friendly. We use the analytical cookies only based on your prior consent.

Hereunder we have listed all the cookies used on our website. You will find the information regarding their purpose, retention period and whether it is a first-party or a third-party cookie.

Category	Name	Purpose	Retention period	First party or third party
	@@scroll#	tbd	Session	First-party
Analytical	_ga	Used as part of Google Analytics to distinguish users.	2 years	Third-party: Google, LLC
Analytical	_gat	Used as part of Google Analytics to distinguish users.	24 hours	Third-party: Google, LLC
Analytical	_gid	Used as part of Google Analytics to throttle request rate.	24 hours	Third-party: Google, LLC

8. Contact Us / Contact details

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal data and think we may have breached any applicable privacy laws, or any other relevant obligation, please contact our privacy compliance team using the contact details set out below. We will make a record of your complaint and refer it to our internal complaint resolution department for further investigation. We will deal with the matter as soon as we can, and keep you informed of the progress of our investigation.

In addition to the foregoing, you also have the right to lodge a complaint with the Estonian data protection authority (Estonian Data Protection Inspectorate) or the court.

If you have any questions or comments about this Privacy Policy, or if you would like to review, delete or update information we have about you or your preferences, please contact our privacy compliance team at the following address: info@myriadtrust.io

9. Changes to this policy

We may make changes to this policy from time to time to take into account changes to our standard practices and procedures or where necessary to comply with applicable new laws, regulations, case-law and guidelines issued by competent authorities. Should the changes be material to you, we will notify you by e-mail and pop-up on the website. The latest version of this policy will always be available on our website.