# **Privacy Policy**

Last Updated: June 10, 2023

#### INTRODUCTION

Thank you for visiting the DARO VENTURE CONGLOMERATE trading platform (https://www.daro.vc). By visiting, accessing, or using DARO VENTURE CONGLOMERATE and its associated application program interface or mobile applications ("Site"), you agree to our privacy policy ("Privacy Policy") and practices. PLEASE READ THIS PRIVACY POLICY CAREFULLY. This Privacy Policy explains how DARO VENTURE CONGLOMERATE uses your Personal Data (defined below) as we provide you with access and functionality through our platform for information provision and digital asset exchange via the website https://www.daro.vc, software, application program interface (API), technologies, products, and/or features ("Service"). In providing you with our Service, to comply with the laws of the jurisdictions in which we operate and improve our services, we need to collect and store personal information about you. As a general rule, we never disclose any personal information about our customers to third parties, except as described below. DARO VENTURE CONGLOMERATE may update this Privacy Policy at any time and from time to time by posting an amended version on this website.

#### DATA WE COLLECT

DARO VENTURE CONGLOMERATE collects, processes, and stores Personal Data obtained from you as a result of your use of the Service or with your consent. This Personal Data may include:

- 1. Account/password.
- 2. Account assets, transaction history, exchange data, and/or taxpayer identification data.
- 3. Transaction information: information about transactions you make on the Platform, such as the recipient's name, your name, amount, and/or timestamp.
- 4. Message content: feedback, email, SMS, app ratings, comments.
- 5. App activity: browsers and touch records, search history, installed applications, launched applications, crash logs, user content, favorites, touch movement, scroll position, key events, and touch events.
- 6. Device information: carrier, brand, software version, model name, manufacturer, system language, OS version, language standard, fingerprint, build identifier, main frequency band version, SIM card country, SIM card serial number, battery status, network, OAID, IMEI, GUID, MAC address, Android identifier, SSID, advertising identifier, and gyroscope/accelerometer data.
- 7. Correspondence: responses to surveys, information provided to our support team or user research group.
- 8. Audio, electronic, visual, and similar information, such as call recordings and video recordings.

We may collect information that you provide during the registration process with DARO VENTURE CONGLOMERATE, which may be completed, incomplete, or terminated. When offering services to residents of certain jurisdictions, we collect, store, and process your personal information in accordance with the provisions of local data protection laws, such as the General Data Protection Regulation (GDPR) and Data Protection Act.

In addition, to comply with applicable anti-money laundering laws and regulations, we may collect the

following personal information: **INDIVIDUAL CLIENTS: Email Address** Mobile Phone Number Full Legal Name (including any former names and names in the local language) **Nationality** Passport Number or any government-issued identification number Date of Birth ("DOB") Proof of Identity (e.g., passport, driver's license, or government-issued identity card) **Residential Address Proof of Residence** Additional personal data or documentation at the discretion of our Compliance team. **CORPORATE CLIENTS:** Corporate Legal Name (including legal name in the local language) Registration/Incorporation Information Full legal names of all beneficial owners, directors, and legal representatives. Address (principal place of business and/or other physical locations) Evidence of Legal Existence **Business Description** 

Contact information for owners, executives, and management (if applicable)

Ownership percentage for individual/corporate owners

Proof of Identity (e.g., passport, driver's license, or government-issued identity card) for significant individual beneficial owners of institutional clients within the organization.

PERSONAL DATA FOR EACH SIGNIFICANT BENEFICIAL OWNER OF AN INSTITUTIONAL CLIENT (For detailed information on the personal data we collect for individuals, see the "Individual Clients" section above).

Source of Wealth

Amount of Bitcoin or other digital assets to be introduced

ACCESS, CORRECTION, DELETION, AND OTHER RIGHTS RELATING TO YOUR PERSONAL DATA

In accordance with applicable laws, as stated below, you have a range of rights regarding your privacy and the protection of your personal data. You have the right to request access to your personal data, correct and delete it, and request data portability. You can also object to our processing of your personal data or request us to restrict the processing of your personal data in certain cases. Moreover, if you provide your consent for us to process your personal data for a specific purpose, you can withdraw your consent at any time. If you wish to exercise any of your rights outlined below, please contact our data protection specialist via email at support@daro.vc. These rights may be restricted in some situations, for example, when applicable legislation or anti-money laundering compliance practices require us to process your personal data.

Right to Rectification: You can request the correction of your inaccurate personal data and supplement it. You can also change your personal data in your Account at any time.

Right to Erasure: In certain cases, you can delete your personal data.

Right to Object: You can object, for reasons related to your particular situation, to the processing of your personal data. For instance, you have the right to object when we rely on legitimate interests or when we process your personal data for direct marketing purposes.

Right to Restriction of Processing: In certain cases, you have the right to temporarily restrict our processing of your personal data when there are substantial grounds for doing so. We may continue processing your personal data if necessary to defend against legal claims or for any other reasons allowed by applicable legislation.

Right to Withdraw Consent: For processing that requires your consent, you have the right to withdraw your consent at any time. Exercising this right does not affect the lawfulness of processing based on consent before its withdrawal.

Exercising your rights as outlined above may affect the form and content of the Services we provide to you, and in some circumstances, such exercise may mean that we cannot continue to provide you with the Services, and we may need to terminate any agreement you have with us.

We may charge you a reasonable fee for processing your requests for access to your personal data. If we decide to charge a fee, we will provide you with a written estimate of the amount we will charge. Please

note that we are not obligated to respond to your access request or process it if you have not agreed to pay the fee.

### **COLLECTION OF PERSONAL DATA**

You will directly provide us with most of the personal information we collect. We will collect and process your information in the following situations:

- (a) When you register online, log in, or access DARO VENTURE CONGLOMERATE or use any DARO VENTURE CONGLOMERATE service;
- (b) When you voluntarily complete user surveys or provide feedback to us via email or any other channel;
- (c) Through cookies via your browser or software when you use or browse our web pages or clients.
- (d) Other instances of self-collection of information mentioned in this agreement.

### **USE OF PERSONAL DATA**

We may use your Personal Data in the following ways:

(a) Compliance with Laws and Regulations

Most of our services are subject to laws and regulations that require us to collect, use, and store your Personal Data in specific ways. For example, DARO VENTURE CONGLOMERATE must identify and verify clients using our services to comply with anti-money laundering laws across jurisdictions. This includes collecting and storing photos of your identification. We may have to close your account if you do not provide the required personal information as mandated by the law.

(b) Ensuring Compliance with the Terms of This Agreement

We actively monitor, investigate, prevent, and mitigate any potential prohibited or illegal actions, ensure compliance with our agreements with third parties, and prevent and check violations of this Agreement. Moreover, we may need to charge you for using our services. We collect information about how you use your account and closely monitor your interactions with our services. We may use any personal information we have collected about you for these purposes.

(c) Detecting and Preventing Fraud and/or Loss of Funds

We process your personal information to help detect, prevent, and reduce fraud and abuse of our services, as well as to protect the security of your account.

(d) Providing Services

We will need access to your personal information to provide you with services. For instance, if you wish to use an additional service on our DARO VENTURE CONGLOMERATE platform, specific information such

as your identity, contact information, and payment information will be required. We may also work with third-party identity verification service providers who collect your personal information when providing identity verification and/or fraud prevention services.

## (e) Providing Service Communications

We will send you account management or service-related information to keep you informed about the latest updates and information about our services, notify you about security-related issues, or provide other information related to trading. Without these messages, you may not be aware of important events related to your account that could impact your use of our services. You cannot opt out of receiving essential service messages such as emails or text messages sent for legal or security purposes.

# (f) Providing Customer Support

We will have access to your personal information when you contact us to resolve any issues. We cannot respond to your request or ensure your uninterrupted use of the service if you do not process your personal information.

# (g) Ensuring Network and Information Security

We will process your personal information to enhance security, track and verify your identity and access to our services, combat spam or other malicious software or security threats, and comply with applicable security laws and regulations. It is critically important that we receive timely and accurate information about how you use our services. We may not be able to ensure the security of our services if you do not process your personal information.

### (h) For Research and Development

We will have access to your personal information to better understand how you use our services and interact with them. Additionally, we will use this information to tailor and improve the content and structure of our services and to develop further services. We may not be able to guarantee that you can continue to use our services if you do not process your personal information.

# (i) Enhance Your Experience

We will have access to your personal information to provide you with a personalized experience and meet your needs. For example, you may allow us access to specific personal information held by third parties. We may not be able to ensure you have access to some or all of our services if you do not process your personal information.

# (j) Facilitating Mergers, Acquisitions, or Company Transactions

We may access any information about your account and use of our services in the event of corporate acquisitions, mergers, or other corporate transactions. If you do not want your personal information to be processed for these purposes, you can close your account.

# (k) Engage in Marketing Activities

We may send you marketing messages (e.g., emails or text messages) to inform you about our events or our partners' activities, provide targeted marketing, and offer you advertising deals. Our marketing strategy will be based on your advertising and marketing preferences and in accordance with applicable legislation. If you do not want to receive marketing information from us, please send a request to our data protection specialist at support@daro.vc.

# (I) For Any Other Purposes

We may disclose your personal information for any purposes to which you have given consent.

Nevertheless, we may also transfer your Personal Data to the following individuals or organizations under the circumstances specified below:

## (a) Affiliates:

Personal information we process and collect may be transferred between DARO VENTURE CONGLOMERATE companies as a routine part of conducting business and providing our services to you.

# (b) Third-Party Service Providers:

We hire other companies and individuals to perform functions on our behalf. Examples include data analysis, providing marketing assistance, processing payments, delivering content, as well as assessing and managing credit risk. These third-party service providers have access only to the personal information necessary to perform their functions and may not use it for other purposes. Moreover, they must process personal information in accordance with our contractual agreements and only in accordance with applicable data protection laws.

# (c) Legal Authorities:

By law or court order, we may be required to disclose specific information about you or any of our interactions with you to relevant regulatory, law enforcement, and/or other competent authorities. We will disclose information about you to law enforcement agencies to the extent required by law. We may also need to share your information to ensure compliance with or enforcement of our lawful rights or to prevent fraud.

### (d) Business Transfers:

### (e) Protecting DARO VENTURE CONGLOMERATE and Others:

We disclose accounts and other personal information when we believe that disclosure of such information is required by law or our regulatory obligations; to enforce or apply our User Agreement and other agreements; or to protect the rights, property, or safety of DARO VENTURE CONGLOMERATE, our users, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

DARO VENTURE CONGLOMERATE will not provide, sell, rent, share, or trade your personal information to any unrelated third party without your prior consent, except where a third party and DARO VENTURE CONGLOMERATE (including our affiliates) individually or jointly have provided you with a service, and after the service is terminated, access to such information, including all previously accessible information, will be prohibited. DARO VENTURE CONGLOMERATE also does not permit third parties to collect, edit, sell, or distribute your personal information in any way. If any DARO VENTURE CONGLOMERATE user engages in the above actions, after discovery, DARO VENTURE CONGLOMERATE has the right to terminate the service agreement with the user.

If you are not a natural person with full capacity to conduct civil rights and civil behavior, you do not have the right to use this service. In the future, DARO VENTURE CONGLOMERATE hopes that you will not provide any personal information.

### STORAGE OF INFORMATION

Information and materials collected about you will be stored on DARO VENTURE CONGLOMERATE servers and/or its subsidiaries and may be transferred to countries, regions, or locations outside the country where the information and materials were collected by DARO VENTURE CONGLOMERATE and may be visited, stored, and displayed outside the country of origin. By submitting your personal data, you agree to such transfer, storage, and/or processing. Further information about the transfer of personal data and/or information regarding users located within the EU can be found in the "Additional Provisions for EU Users" section.

### **CROSS-BORDER INFORMATION TRANSFERS**

To facilitate our global operations, DARO VENTURE CONGLOMERATE may transfer your personal information outside the European Economic Area ("EEA"). Transfers outside the EEA are sometimes referred to as "transfers to third countries."

We may transfer your personal information to our Affiliates, third-party partners, and service providers worldwide. In cases where we intend to transfer personal information to third countries or international organizations outside the EEA, DARO VENTURE CONGLOMERATE takes appropriate technical, organizational, and contractual security measures (including standard contractual clauses) to ensure that such transfers comply with applicable data protection laws.

We also rely on decisions of the European Commission that certain countries and territories outside the European Economic Area provide an adequate level of data protection. These decisions are known as "adequacy decisions."

### **COOKIES**

Setting of Cookies. When you visit the Platform, the Platform will use Google Analytics cookies to record the performance of the Platform and assess the effectiveness of online advertising. Cookies are small amounts of data that are sent to your browser and stored on your computer's hard drive. Cookies are only sent to your computer's hard drive when you use your computer to access the Platform.

#### **COOKIE FUNCTIONALITY**

Cookie Function. Cookies are often used to record the habits and preferences of visitors as they browse various elements on the Platform. Cookies collect anonymous aggregated statistics that do not contain Personal Data. Cookies cannot be used to obtain data from your hard drive, your email address, or personal data; they can allow the Platform or the service provider's system to recognize your web browser and collect and retain information.

Disabling Cookies. Most browsers are set to accept cookies, and you can configure your web browser to reject cookies or notify you about their installation. You should be aware that you may not have the ability to run or use certain Platform functions if you decide to disable cookies. However, if you choose to reject cookies, you will not be able to log in or use the services or features of our platform that rely on such cookies. This paragraph applies to any relevant information obtained through cookies set by DARO VENTURE CONGLOMERATE.

### INFORMATIONAL SECURITY

Your account is secure and protected; please keep your account and password information properly. We will ensure that your information is not lost, used improperly, or altered by maintaining backups of other servers and encrypting user passwords. Despite the security measures mentioned above, please be aware that there is no such thing as "perfect security" on the internet. When using our Platform services for online trading, you inevitably disclose your personal information, such as contact information or mailing address, to the counterparty or other potential counterparty. Please protect your personal information and provide it to other parties only when necessary. If you discover that your personal information, especially your account and password, has been disclosed, please contact our customer support immediately so that we can take appropriate action.

We will store personal data in accordance with the Personal Data Protection Act and/or other applicable laws. In other words, we will destroy or anonymize your personal data if we reasonably determine that (1) the storage of such personal data no longer serves the purpose for which personal data was collected; (2) storage is no longer necessary for any legal or business purpose; and (3) no other legitimate interests guarantee the further storage of such personal data. If you cease to use our services, we may continue to store, use, and/or disclose your personal data in accordance with this Privacy Policy and our obligations under the Personal Data Protection Act and/or other applicable laws.

# ACCOUNT DELETION

You can delete your DARO VENTURE CONGLOMERATE account at any time. Consequences of deleting an account include, among other things:

- (a) You will lose all digital assets and data contained in that account.
- (b) You will not be able to recover personal information, transaction records, business data, and historical account information.

(c) You will not be able to use this account to access DARO VENTURE CONGLOMERATE services.

### **IMPORTANT**

An account cannot be restored after deletion. To protect your rights, we will remind you of the risks after you click the "Delete Account" button.

Deleting your account does not mean that all your operations and responsibilities related to the account before the account was deleted are released from liability or mitigated. All records and information associated with your account will be deleted. However, we may retain certain information about your account as required by applicable laws and regulations.

### PROVISIONS SPECIFIC TO THE EU

The provisions in this section apply only if you are a user located in the European Union (EU). These provisions take precedence over any conflicting provisions elsewhere in this Privacy Policy.

Your Personal Data may be transferred outside the EU. In such cases, we take all reasonable precautions to apply the appropriate or suitable security measures as provided by the GDPR, such as implementing measures like standard contractual clauses, to ensure that the recipients of such transfers protect and handle your personal data in compliance with all applicable data protection laws.

In accordance with the GDPR, you have the following rights:

- (a) The right to access personal information about yourself, rectify or correct inaccurate information, and when applicable, object to data processing;
- (b) The right to have data deleted when it was collected solely on the basis of your consent or it is no longer necessary for the purposes for which it was collected;
- (c) The right to restrict processing when such data is no longer necessary for the purposes for which it was collected;
- (d) The right to data portability, i.e., the right to receive personal information in a structured, commonly used, and machine-readable format;
- (e) The right to withdraw consent at any time without prejudice, provided that the processing of personal data is based solely on your consent.

### CONTACT

You can contact our data protection specialist via email at support@daro.vc, and they will work on resolving any questions or issues you may have regarding the collection and processing of your personal information.

# **NOTIFICATIONS AND CHANGES**

If you have any concerns regarding privacy at DARO VENTURE CONGLOMERATE, please don't hesitate to reach out to us, and we will attempt to address your inquiries as promptly as possible.

Our business changes regularly, and our Privacy Notice may also change. You should check our websites frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information we have about you and your account.

Our Privacy Notice is not linked to the privacy notice or policy of any third parties, such as Trading View or other parties unfamiliar with this Privacy Notice.