

## Privacy Policy

### 1. Purpose

Our Privacy Policy explains how KABN (Gibraltar) PLC. (“KABN” or the “Company”) its subsidiaries, affiliate companies and the digital on-boarding, Know-Your-Customer (KYC) and Anti-Money Laundering (AML) companies that KABN works with collect, use, store and disclose your personal information. It also describes the choices available to you concerning the use of, your access to, and how to update and correct your personal information.

### 2. Scope

This Privacy Policy applies to personal information that KABN collects when you use or access the Company’s web and mobile applications, [www.kabnsystemna.com](http://www.kabnsystemna.com), and other Services offered by KABN that mention this policy (collectively referred to as “Services”).

“Personal Information” is defined as any information about an identifiable individual.

Personal information will be handled by KABN in accordance with the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) and this Privacy Policy.

### 3. Consent

When you sign up for a user account, KABN will ask for your express consent to the collection, use, disclosure and retention of your personal information as outlined in this Privacy Policy and for any other purposes identified to you at the time of collection. To verify your identity, KABN will ask for your express consent to the collection, use, disclosure and retention of specific personal information including ID documentation, and a “selfie” picture of yourself. Additional documentation in the form of a utility bill or bank statement may be required. You have the right to withdraw your consent at any time. However, if you choose to withdraw your consent with respect to any information that KABN collects in order to provide the Services to you, we will no longer be able to provide the Service to you. You may always opt out of KABN’s collection, use and disclosure of your personal information for any marketing purposes without affecting your use of the Services.

### 4. Security

KABN takes commercially reasonable measures to help safeguard your personal information from loss, disclosure, alteration, misuse and unauthorized access, theft and destruction. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your data that they will protect the data with adequate safeguards. As the internet is not 100% secure, KABN cannot guarantee the absolute security of your information. We do not accept liability for unintentional disclosure. KABN is not responsible for the security of information that you transmit to us over networks that the Company does not control, including the internet and wireless networks.

KABN retains information collected for no longer than is reasonably necessary to fulfill the purposes for which the Company collects information and to comply with the Company's legal obligations.

If you have any questions about the security of your personal information, please contact us at [support@kabn.network](mailto:support@kabn.network).

## 5. Collection of Information

KABN collects the following types of information:

Information that you provide to KABN directly to deliver Services requested

When you use the Services to register an account with KABN, the Company will collect your email address. When you use the Services to verify your identity through KABN, the Company will collect information such as ID Documents (passport, driver's license, ID card, etc...), document type, scan of the document, country, "selfie" photo, account ID, legal name, national ID number, gender, date of birth, mailing address, IP address, user name, blockchain address, email, local storage, user display settings, Google authenticators, audit logs, and device camera. When you use the Services to verify your identity, KABN may collect information such as Social Insurance Number, credit records, telephone number, IP Address and utility bills.

Facial Biometric Identity Verification

Facial biometric identity verification is accomplished by comparing two or more captured images of faces. The biometric identifiers used to complete this assessment are taken from the images that you submit.

Information we may collect from Third Parties

KABN may collect information about you from other sources, including third parties that help the Company verify your eligibility for KABN Services. This information may be combined with personal information that has been collected about you under this Privacy Policy. Please note that the information KABN may receive from these third parties is governed by the privacy settings, policies, and/or procedures of the third parties.

## 6. Cookie Policy

A cookie is a small text file that is placed and stored on your computer, mobile or other devices by webpages that you visit. The Cookies collect information in an anonymous form, including the number of visitors to the webpage, how the visitor found the webpage and recent webpages visited. All cookies used by KABN are in accordance with current regulations.

Before Cookies are placed on your device, you will be shown a pop-up requesting your consent to KABN's use of Cookies. Your consent enables KABN to provide the best possible service to you.

If you do not consent to the use of Cookies certain features of the KABN Service may not function as intended. You are also able to delete Cookies from your device at any time.

KABN uses cookies for language selection and other semi persistent settings for visitors who are not signed in. KABN uses an encrypted session cookie for signed in users to identify who is signed in. Any other information in the encrypted session cookie is only available to read by our servers and should be treated as server data. It could include temporary messages or errors while using the app.

KABN may also use any of the following categories of Cookies.

1. Essential Cookies

The Cookies are strictly necessary for the KABN website to function. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. These Cookies do not store any personally identifiable information.

2. Analytics Cookies

These Cookies track information about visits to the website so that we can make improvements and report performance. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these Cookies collect is aggregated and anonymous.

3. Functional or Preference Cookies

These Cookies enable the website to provide enhanced functionality and personalisation. They are used to remember information you have entered or choices you make (i.e. username or language) on the KABN website. They may be set by KABN or by third party providers whose services we have added to our pages.

## 7. Use of Information

KABN may use the information collected from you for the following purposes:

KABN may use personal information to provide products, Services or information requested by you. Examples include to manage your individual information and account, help you efficiently access your information after you sign in, allow access to certain functionalities and features of the Company's Services, and respond to your inquiries.

KABN may use personal information for the following administrative purposes:

- Verify your identity
- Process applications and transactions
- Validate your identity with third parties of your choosing and upon your direction
- Transfer your information that you choose to share with third parties upon your direction
- Measure interest in KABN's Services
- Develop new products and Services or improve existing products and Services
- Monitor metrics such as total number of visitors, traffic, and demographic patterns applicable to the Services
- Send you Service-related emails (i.e., account verification, changes or updates to features of the Service, technical and security notice)
- Compliance with legal obligations and regulatory requirements (i.e., respond to legal process or request for information issued by government authorities)
- Prevent potentially prohibited or illegal activities
- Enforce KABN Terms and Conditions

## 8. Sharing of Information

KABN will not rent, share, transfer or sell your information to third parties without your consent, except as noted in this Privacy Policy.

KABN may disclose information the Company collects in the following circumstances or as otherwise described in this Privacy Policy:

### With Vendors and Service Providers

KABN may disclose your information to third party service providers that perform services on the Company's behalf, such as web-hosting companies, analytics providers and information technology providers. KABN entrusts personal information to the following types of service providers:

- Providers of IT and related services
- Customer service activities
- Fraud prevention
- Providers of services you have requested

KABN has contracts with service providers that forbid them from using or disclosing personal information except as necessary to execute the contracted services on the Company's behalf or to fulfil legal obligations.

### With Law Enforcement or Government Authorities

KABN may disclose information as may be permitted or required by laws of any jurisdiction that may apply to the Company, as provided for under contract, or as KABN NA deems reasonably necessary to provide legal services. In these circumstances, the Company takes reasonable efforts to notify you prior to disclosing information that may

reasonably identify you, unless prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.

#### Change of Control

If KABN sells or otherwise transfers part or the whole of KABN or the Company's assets to another organization (i.e., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. The buyer or transferee will have to honour the commitments KABN has made in this Privacy Policy.

### 9. Transfer of Data

KABN takes all reasonable steps to ensure that the data we collect under this privacy statement is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located. KABN operates in Gibraltar and through its Licensor and affiliated KABN companies, throughout the world and as we don't necessarily store your data in your country of origin, we do transfer personal data from your country to the European Economic Area and to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. Some of these data transfers may include a transfer between KABN entities, to third party suppliers and to cloud based storage providers.

Any transfer we make is done using a variety of legal mechanisms, including contracts, to help ensure your rights and equivalent protections travel with your data. We want to ensure that data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data.

Ways in which we safeguard your data include, but are not limited to:

- a. Through the use of a transfer agreement which includes the current standard contractual clauses put in place by the European Commission for the transfer of personal data;
- b. For any transfer of data to a US based entity, we require that entity to be part of Privacy Shield which is the framework in place in the United States to safeguard data;

Other circumstances under which your data could be transferred include when it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interest for the purposes of the contract and where you have consented to the data transfer.

### 10. Individual's Data Rights

This section addresses how KABN handles requests pertaining to an individual's rights as set out in the European Union's General Data Protection Regulation (GDPR).

You may contact us at [support@kabn.network](mailto:support@kabn.network) to inquire about your right to view all of the personal data that KABN has collected about you. Requests to access personal data will be answered within one month of receipt. A representative of KABN will provide more details during correspondence.

You may contact us at [support@kabn.network](mailto:support@kabn.network) to request that KABN update or fix your personal data. Requests to rectify personal information will be answered within one month of receipt. A representative of KABN will provide more details during correspondence.

You may contact us at [support@kabn.network](mailto:support@kabn.network) to request that KABN erase all of your personal data on file. KABN is only able to provide the Services through collection, use, storage, and sharing of your personal data. Without your personal data, KABN is unable to provide the Services requested. A request for the erasure of personal data equates to a request to be deleted from all KABN systems. Requests to erase personal data will be answered within one month of receipt. A representative of KABN will provide more details during correspondence.

You may contact us at [support@kabn.network](mailto:support@kabn.network) to request that KABN restrict the processing of your personal data. Requests to restrict processing will be answered within one month. A representative of KABN will provide more details during correspondence.

You may contact us at [support@kabn.network](mailto:support@kabn.network) to request that KABN export all of your personal data on file. Personal data will be exported in a commonly used format. Requests to export data will be answered within one month. A representative of KABN will provide more details during correspondence.

## 11. Third Party Services and Content

The third party vendors with which KABN shares your personal information are contractually required by the Company to keep this information confidential and may generally not use such information for any purpose other than to help the Company provide solutions to KABN customers.

KABN's Services may include integrated content or links to content provided by third parties. This Privacy Policy does not address the privacy, security, or other practice of the third parties that provide such content.

KABN may use third party service providers to collect personal information on its behalf. These third party service providers may be located in countries where the privacy laws provide different levels of protection for personal information. If you would like more information about KABN's use of these service providers, please contact us at [support@kabn.network](mailto:support@kabn.network).

## 12.Retention

The Company retains personal information no longer than is necessary to fulfill the purpose(s) for which it was collected, except where you have given permission for a longer retention period or a longer period is permitted under applicable laws.

## 13.Updates or Changes to KABN Policies

KABN may modify or update this Privacy Policy from time to time, so please review it periodically. If the Company makes any material changes in the way it collects, uses, and/or shares the personal information that you have provided, the Company will notify you by posting notice of the changes in a clear manner. Your continued use of KABN's Services after any modification to this Privacy Policy will constitute your acceptance of such modification.

## 14.Your Choices and Rights

Subject to local law, you may have certain rights regarding information that KABN has collected and that is related to you. Please contact KABN to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate or out of date. You can also ask to see what personal information KABN retains about you, and to erase your personal information. If you would like to exercise the rights you may have, please contact us at [support@kabn.network](mailto:support@kabn.network).

Although KABN strives to provide individuals with access to their personal information, there may be instances where KABN may not provide access, including but not limited to: where the information would put another individual's privacy at risk, where the access would reveal confidential commercial information, or the requested information contains legal privilege. If KABN determines that access should be limited in any specific instance, the Company will provide an explanation of why that assessment has been made and a contact point for any further concerns.

If you no longer wish to receive marketing communications, please contact us.

## 15.Children's Privacy

KABN does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to register for the Service. The Service and its content are not directed at children under the age of 18. In the event that KABN learns that the Company has collected personal information from a child under the age of 18 without parental consent, KABN will delete that information as quickly as possible. If you believe that KABN might have any information from or about a child under 18, please contact the Company.

## 16.Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at [support@kabn.network](mailto:support@kabn.network).