

## **PRIVACY POLICY**

***Last Updated: 7th of August, 2025***

This Privacy Policy ("**Policy**") outlines Decubate B.V.'s ("**Decubate**", "**we**", or "**us**") practices in relation to the storage, use, processing, and disclosure of personal data that you (hereinafter referred to as "**User**" or "**you**") shared with us when you access the Decubate Service (as defined in the [Terms and Conditions](#)) or use the Services. This Policy, together with our Terms and Conditions and Cookie Policy, applies to your use of the Services.

At Decubate, we are committed to protecting your personal data and respecting your privacy. During the processing of your personal data, we adhere to the requirements of relevant privacy legislation, including the General Data Protection Regulation (GDPR). Please read this Policy carefully to understand our practices regarding your personal data and how we will treat it. The Policy sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us.

Unless defined in this Policy, capitalized words shall have the same meaning ascribed to them in our Terms and Conditions. Please read this Policy in consonance with our Terms.

By accessing the Services, you consent to the collection, storage, use, and disclosure of your personal data in accordance with this Policy, and are agreeing to be bound by this Policy.

### **1. THE DATA WE COLLECT ABOUT YOU**

1. Decubate may process your personal data if you:
  - a. are a visitor or User of our website;
  - b. are a User of our Services;
  - c. are (an authorized representative or UBO of) our customer (or their related family member or close business partner).
2. We may collect, use, store, and transfer different kinds of personal data about you in connection with your use of the Services, including but not limited to:
  - a. Registration and identification data;
    - i. Full name;
    - ii. Address;
    - iii. Country of residence;
    - iv. Telephone number;
    - v. E-mail address;
    - vi. Passport/ID-card/driver's license;
    - vii. Photo/video
    - viii. Date of Birth;
    - ix. Place of Birth;
    - x. Nationality;
    - xi. Verification documents;
    - xii. Client ID;
    - xiii. Answers to onboarding questions (e.g. employment status, purpose of business relationship)
    - xiv. Proof and/or source of funds.

- b. Personal data included in institutional information: proof of legal formation of a company (e.g. articles of incorporation), additional legal document, including but not limited to articles of association, shareholder register, structure chart, corporate tax return and UBO statement, and personal identification (and institutional) information for all direct and indirect representatives, directors and material beneficial owners (if applicable).
  - c. Account information: Information of purpose and intended nature of the business relationship you have with us.
  - d. Financial data, including cryptocurrency wallet address and transactional data;
  - e. Technical data, including IP address, login details, time zone setting and locations, operating system, and other technologies on your device used to access the Services;
  - f. Any information you voluntarily share with us, for example via the contact form on the website or via customer support.
- 3. Special categories of personal data: Part of your registration and identification data qualifies as biometric data. We process such data as this is necessary for our legal identification and authentication purposes. We may also process personal data related to criminal offenses and/or personal data revealing political opinions to meet our legal obligations under the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft).
- 4. You do not have to provide any personal data or information to us but in not doing so, you may not be able to use the Services we offer.

## **2. HOW IS YOUR PERSONAL DATA COLLECTED?**

- 1. Information you give us: This is the information you provide us about you when creating an account and using our Services or by corresponding with us (for example, by email or chat). It includes information you provide when you share data through the Platform, through other activities commonly carried out in connection with the Services, and when you report a problem with the Services. If you contact us, we will keep a record of the information shared during the correspondence.
- 2. Information we collect about you and your device: Each time you visit our Platform, or use one of our Services, we will automatically collect personal data including technical and usage data. We may also receive certain usage data, such as your IP address and referral source.
- 3. We also collect, use, and share aggregated data such as statistical data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data under applicable laws. For example, we may aggregate your usage data to calculate the percentage of Users accessing a specific feature of the Services. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

## **3. LEGAL GROUNDS AND PURPOSE OF PROCESSING PERSONAL DATA**

1. By using our website, the website functionalities and our Services the above mentioned categories of personal data may be processed. We may process your personal data if we have a legal ground to do so. This can be for example your consent, to fulfill a contract with you, when we have a legal duty to comply with, or when it is in our legitimate business interest to use your personal data. We can only rely on our legitimate business interest, if it is fair and reasonable to do so. We primarily use your personal data to enable your use of the Services requested by you. We may process your personal data for the following purposes:
  - a. Creating an account: via our website you can create an account on our online platform. This account allows you to make use of the Services that Decubate provides. To create an account, we will ask you to share certain personal data. In the event of suspicion of fraud or misuse of our website we may hand over personal data to the entitled authorities. When creating an account, we process your personal data for the performance of your agreement with Decubate.
  - b. Verifying your cryptocurrency wallet address: In order to use your cryptocurrency wallet for our Services, we need to verify this wallet. When verifying your cryptocurrency wallet we process your personal data for the performance of your agreement with Decubate.
  - c. Verification procedure: At Decubate we have a verification procedure in place as part of our security measures and legal obligation. In order to complete this verification procedure we need your name, email address, date of birth, country of residence and telephone number. You also need to provide us with a copy of your passport or ID-card and address details. If deemed necessary you need to provide us with more verification documents. When proceeding through the verification procedure we process your personal data in order to comply with a legal duty.
  - d. Customer and Transaction Monitoring: Customers and transactions are monitored in order to prevent anti-money laundering and financing of terrorism. When monitoring, we process your personal data in order to comply with a legal duty.
  - e. Setting alerts: We will send these notifications to the e-mail address that you provided us. When setting alerts, we process your personal data with your consent, which can be withdrawn at any time.
  - f. Contacting Decubate: If you have any questions relating to our Services. You can contact us via email, our social media channels or by filling in our contact form. To answer a question that is sent via the contact form, we will process your name and e-mail address. When contacting Decubate we process your personal data on account of a legitimate business interest.
  - g. Receiving our email updates: We send emails to inform those interested about our Services. You can ask to receive the emails via our website. To receive these emails, we process your personal data with your consent, which can be withdrawn at any time by opting out from receiving future marketing communications through an opt-out button included in each communication.
  - h. Other uses: We may further use your information for the following purposes:

- i. To operate, manage, develop and promote our business and, in particular, our relationship with the organization you represent (if any) and related transactions – this includes, for example, marketing and billing/ payment purposes;
  - ii. Decubate has a legal obligation to know who our Customers are in accordance with Know Your Customer (KYC) regulations. Decubate has contracted specialized parties to do parts of this KYC onboarding process for Decubate. Personal data can be shared with these parties for meeting the KYC regulations;
  - iii. To operate, administer and improve our website and premises and other aspects of the way in which we conduct our operations;
  - iv. To protect our business from fraud, money-laundering, breach of confidence, theft of proprietary materials and other financial or business crimes; and
  - v. To comply with our legal and regulatory obligations and file and defend legal claims. When processing your personal information for these purposes, we process your personal data on account of a legal duty and/or legitimate business interest.
2. We may from time to time review information about you held in our systems – including the contents of and other information related to your email and other communication with us – for compliance and business-protection purposes as described above. This may include reviews for the purposes of disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law these reviews will be conducted in a reasonable and proportionate way and will be approved at an appropriate level of management. They may ultimately involve disclosure of your information to governmental agencies and litigation counterparties as described below. Your emails and other communications may also occasionally be accessed by persons other than the members of staff with whom they are exchanged for ordinary business management purposes (for example, if necessary, when a staff member is out of the office or isn't an employee of Decubate anymore).
3. We will only process your personal information if this is necessary for the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances we may also be required by law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself, if providing the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary. If it is voluntary there will be no implications if you decline to provide the information. Otherwise you should assume that we need the information for our business or compliance purposes (as described above). If you are uncertain as to Decubate's need for information that we request from you, please contact the Decubate representative asking for the information, or Contact us (see below), with your query.

#### **4. (INTERNATIONAL) DATA TRANSFERS AND DISCLOSURE TO THIRD PARTIES**

1. We may disclose your personal data where we have obtained your consent or where it is reasonably necessary for the various purposes set out above:
  - a. To the other members of the Decubate group of companies;
  - b. To improve our website and premises and other aspects of the way in which we conduct our operations;
  - c. To service providers, including hosting providers, payment providers, e-mail service providers and (web) developers who host our website or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
  - d. To a person who takes over our business and assets, or relevant parts of them; or
  - e. In exceptional circumstances:
    - i. To competent regulatory, prosecuting and other governmental agencies, or litigation counterparties, in any country or territory; or
    - ii. Where we are required by law to disclose.
2. These disclosures may involve transferring your personal information overseas. If you are dealing with us within the European Economic Area (or the UK, after it has left the European Economic Area), you should be aware that this may include transfers to countries outside the European Economic Area / UK, which do not have similarly strict data privacy laws. In those cases, where we transfer personal data to other members of the Decubate group or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements or mechanisms, designed to ensure that your personal information is protected on the same level (including, where appropriate, under an agreement on terms approved for this purpose by the European Commission). Please contact us (see below) if you would like to know whether any such agreements are in place.
3. By submitting your information and personal data to us, you agree to the transfer, storage and/or processing of such information and personal data outside the country you are based in, in the manner described above.

## **5. THIRD PARTY SERVICES**

1. Our Services may, from time to time, contain Services provided by or links to and from the websites of our partner networks, advertisers, and affiliates ("Third Party Services"). Please note that the Third Party Services that may be accessible through our Services have their own privacy policies. We do not accept any responsibility or liability for the policies or for any personal data that may be collected through the Third Party Services. Please check their policies before you submit any personal data to such websites or use their Services.
2. Your relationship with these third parties and their Services and tools is independent of your relationship with us. These third parties may allow you to permit/restrict the information that is collected. It may be in your interest to individually restrict or enable such data collections.
3. The place of processing information depends on each third-party service provider and you should check the privacy policy of each of the service providers to identify the data

shared and its purpose. You will be subject to a third party's privacy policy if you opt in to receive communications from third parties. We will not be responsible for the privacy standards and practices of third parties.

## **6. DATA SECURITY**

1. We take appropriate technical and organizational security measures to protect your personal data from unauthorized access, and such security measures are in compliance with the security practices and procedures as prescribed under the applicable laws. However, you agree and acknowledge that the above-mentioned measures do not guarantee absolute protection to the personal information and by accessing the Services, you agree to assume all risks associated with disclosure of personal information arising due to breach of firewalls and secure server software.
2. We will comply with the requirements of applicable laws in the event of a data or security risk.

## **7. DATA RETENTION**

1. As a rule, we store your personal data for as long as necessary for the purpose for which the data were collected, as described in this Policy. After the retention period is finished or when the data is no longer necessary for the purpose for which the data were collected, the personal data will be deleted. Decubate has the following legal obligations to (keep) retaining personal data for a certain period of time:
  - a. Personal data to the extent relevant to comply with Article 33(3) of the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft) will be kept for a period of 5 years after the business relationship between has been ended;
  - b. Personal data to the extent relevant to comply with Article 34 of the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft) will be kept for a period of 5 years after Decubate submitted a notification to the Financial Intelligence Unit (FIU);
  - c. Personal data to the extent relevant for tax purposes (pursuant to Article 52 of the Dutch General Tax Act) will be kept for a period of 7 years after the latest relevant calendar year.

## **8. YOUR RIGHTS**

1. You have certain rights involving the processing of your data:
  - a. You have the right to request access to the personal data that we have registered about you;
  - b. When the data is incorrect or no longer relevant, you can request any inaccurate personal information to be corrected, supplemented or deleted (right to rectification and supplementation);
  - c. In some circumstances you have the right to limit the processing of your personal data by us;
  - d. In some cases you have the right to be forgotten, which means we have to erase the personal data we hold from you;

- e. You can object to our use of your personal data at any time and you may have the right to object to our processing of some or all of your personal data (right to object) and require them to be deleted in some other circumstances;
  - f. In some circumstances, you have the right to obtain a copy of your data in a usual, machine-readable format in order to be able to transfer it to another organization (right to data portability);
  - g. You have a right regarding automated decision-making and profiling which means you have the right to a human review when decisions are being made.
2. To exercise your rights involving the processing of your data, you can contact Decubate at [support@decubate.com](mailto:support@decubate.com). We may ask you to provide information in order to determine your identity and to ensure that no one other than you is trying to execute your privacy rights. We adhere to the legal deadlines regarding the execution of the request. This means that generally a request will be processed within one month. This period can be extended to two months if it is considered a complex request. You will be notified when the period is extended. In certain cases, if legally permitted, we may deny your request. We will inform you about the reason for denying your request.

## 9. BUSINESS TRANSITIONS

You are aware that in the event we go through a business transition, such as a merger, acquisition by another organization, or sale of all or a portion of our assets, your personal data might be among the assets transferred.

## 10. COOKIES

When you visit the website (<https://www.decubate.com/>), information can be automatically stored on your device. This is done in the form of so-called "cookies", which are small files transferred by a website and stored on your device (such as your computer, mobile phone, tablet, etc.). Cookies could contain personal information about you. They help us to improve our website and to deliver a better and more personalized service. Some of the cookies we use are necessary for the website to operate. You can read more about what cookies we use, for what purpose and how to accept or reject them in Decubate's Cookie Policy.

## 11. NATIONAL SUPERVISORY AUTHORITY

Of course, we will gladly help you if you have any complaints about the processing of your personal data. Based on privacy legislation, you have the right to lodge a complaint with the relevant national data protection authority, responsible for the protection of personal data (this is the 'Autoriteit Persoonsgegevens' for the Netherlands) against our processing of your personal data (<https://www.autoriteitpersoonsgegevens.nl>).

## 12. CHANGES IN PRIVACY POLICY

1. We keep our Policy under regular review and may amend this Policy from time to time, at our sole discretion.
2. The terms of this Policy may change and if they do, the changes will be posted on this page and, where appropriate, notified to you on the website. The new Policy may be

displayed on-screen and you may be required to read and accept the changes to continue your use of the Services.

### **13. CONTACT INFORMATION**

If you want to know more about Decubate's Privacy Policy or have any questions or recommendations, please send an email to [support@decubate.com](mailto:support@decubate.com). Decubate will respond to your request as quickly as possible.