

CALASSYS
CALCULUS ASSET SYSTEM



PRIVACY POLICY



www.calassys.com

1. Overview

This Privacy Policy applies to your Personal Information when you visit this Site or use the Services. This Privacy Policy explains how we may collect, retain, process, share and transfer your Personal Information when you visit this Site or use the Services.

This Privacy Policy is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use this Site and the services.

Please **contact us** via contact@calassys.com if you have questions about our privacy practices that are not addressed in this Privacy Policy.

This Privacy Policy is incorporated by reference into any terms of service made available on the Site or in the Services. By using the Services, you agree to the terms of this Privacy Policy. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately stop using the Services.

Upon your acceptance of this Privacy Policy, your Personal Information collected by us prior to the time of acceptance shall also be subject to this Privacy Policy.

2. Definitions

1. **“Account”** means a User’s account with this Site.
2. **“Personal Information”** means personal information that can be associated with an identified or identifiable person. “Personal Information” can include name, postal address, telephone number, email address, financial account information, account number, date of birth, and government-issued credentials (e.g., driver’s license number, national ID, passport, and Taxpayer ID). Personal Information does not include information that does not identify a specific User.
3. **“Services”**: any website owned or operated by us, any API Tools (as defined below), or mobile applications (the “App(s)”) and all services, features, functionality, and content provided through the Site, API Tools, or App, including:
(i) any digital asset platforms and tools that allow trading of supported digital assets; and (ii) any hosted digital wallets for storage of digital assets.

4. **“Site”** means this website www.calassys.com and our mobile apps, official social media platforms, or other online properties through which we offer the Services.
5. **“User”** means those users who has successfully registered with this Site.

3. What Personal Information Do We Collect?

We may collect information about you when you visit our Sites or use the Services, including the following:

- **Registration information** – When you create an Account or use the Services, we may require you to provide us with your name, postal address, telephone number, and email address to create an Account.
- **Identity Verification information** – We may require you to provide us with additional Personal Information as you use the Services which we may use in collaboration with service providers acting on our behalf to verify your identity, source of funds, and address, and/or to manage risk as required under applicable law. This information may include your date and place of birth, taxpayer or government identification number, a copy of your government-issued identification, or other personal information.
- **Transaction and experience information** – When you use the Services, we may collect information about the transaction, as well as other information associated with the transaction such as amount placed for a purchase/sale order. This information may include your digital wallet address, Internet protocol (IP) address, cookie identifiers, mobile carrier, mobile advertising identifiers, MAC address, details about your browser or device, geo-location information, Internet service provider, pages that you visit before and after using the Services, and other information about how you use the Services. These information would be collected to facilitate the Services we provide.
- **Information about you from third-party sources** – We may obtain information from third-party sources such as public databases, ID verification partners, and credit bureaus, where permitted by law.

Such information may include your name, account number and/or customer ID with a third party, address, job role, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data.

- **Other information we collect related to your use of the Services** – We may collect additional information, including email address, telephone number, mail address from or about you when you communicate with us, contact our customer support teams or respond to a survey. Such information will be collected to maintain contact with you and to provide the Services.

4. How Do We Process Personal Information?

We may process your information for the following purposes:

- **To operate the Site and provide the Services**, including to:
 - generally manage individual information and accounts;
 - authenticate your access to your Account;
 - communicate with you about your Account and your transactions;
 - provide a personalized experience and implement the preferences you request; and
 - keep your Account information up to date and process transactions.
- **To manage our business needs**, such as monitoring, analyzing, and improving the Services and the Sites' performance and functionality; ensuring quality control and staff training; develop new products and Services; and enforcing our agreements with third-parties;
- **To manage risk and verify your identity**, We may use Personal Information to enhance security, monitor and verify service access, combat spam or other malware or security risks; prevent potentially prohibited or illegal activities; and enforce our Terms of Service.

- **To facilitate services provided by third parties.** We may provide your Personal Information to any third parties if you choose to render any services provided to you directly by such third party. For example, if you choose to enter into Fiat Trading via Calassys partnered OTC platforms or Third Party Payment Providers, we may share your Personal Information with such third party in order to facilitate such services.
- **To market to you** about the Services and the products and the Services of unaffiliated businesses. We may also Process your Personal Information to uniquely tailor the marketing content, advertisements, and offers, and certain Services or Site experiences to better match your interests on the Site.
- **To provide personalized Services.** We may use your Personal Information and other information collected in accordance with this Privacy Policy to provide a targeted display, feature, or deliver targeted offers based on your communication preferences.
- **To comply with our obligations and to enforce our terms of services,** including to comply with all applicable laws and regulations.
- **To provide customer support,** for example to respond to your requests, resolve disputes, and troubleshoot problems.
- **Other uses.** We may use personal information for any other purpose disclosed to you at the time you provide such information or otherwise with your consent.

5. How Do We Use Cookies and Tracking Technologies?

When you visit the Site or use the Services, we may use cookies, pixel tags, local storage, and other tracking technologies (collectively, "Cookies") to automatically collect information through the Services, for the following purposes: (1) to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; (2) to measure the effectiveness of promotions and perform analytics; (3) to help us understand how our Users use and interact with the Services so that we can improve them and offer you enhanced functionality when using the Services; and (4) to mitigate risk,

prevent potential fraudulent activity, improve security and promote trust and safety across this Site and the Services. If you would like to opt-out of the Technologies we employ on the Services, you may do so by blocking, disabling, or deleting them as your browser or device permits. However, certain aspects and features of the Services and this Site are only available through the use of Cookies, so if you choose to disable or decline Cookies, the Services may not work properly.

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. You can use DNT as a way for Users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that at this time no formal “Do Not Track” standard has been adopted and we do not respond to or honor DNT signals.

6. Do We Share Personal Information?

We may share your Personal Information or other information about you with others in accordance with the Privacy Policy. We may share your Personal Information or other information for the following reasons:

With other members of our corporate family: We may share your Personal Information with other members of our family of entities for various purposes, including but not limited to, to provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of the Services, and communications.

With third parties that provide services to us: We may share Personal Information with third-party service providers that perform the Services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with the Services, verify your identity, assist in processing transactions, send you advertisements for the Services, or provide customer support. By using the Services, you have acknowledged and approved that third-party service providers have the right to collect, process and store your Personal Information.

With other third parties to protect us or others We may share information about you with other parties for our business purposes, including:

- to protect the vital interests of a person;
- to protect our property, the Services and legal rights;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving the Site or use of the Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals;
- to companies that we plan to merge with or be acquired by; and
- to support our audit, compliance, and corporate governance functions.

With other parties as permitted or required by law and regulations: We may share information about you with other parties if we need to do so to comply with a law, legal process or regulations; or as required by law enforcement, regulators, government officials, or other third parties in relation to a subpoena, court order, or other legal process or requirement under applicable law or regulation; or when we believe, in our sole discretion, that the disclosure of Personal Information is necessary or appropriate to prevent physical harm or financial loss; or to report suspected illegal activity or to investigate violations of a user agreement; or to satisfy regulatory requirements as applicable to provide our Services.

With your consent: We also will share your Personal Information and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.

7. Why Do We Retain Personal Information?

We retain Personal Information to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Information for longer periods than required by law if it is in our legitimate business interests and not prohibited by law. If your Account is closed, we may take steps to mask Personal Information and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Information in accordance with this Privacy Policy.

8. How Do We Protect Your Personal Information?

We maintain appropriate technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Information against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. However, we cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your data will not occur. While we are dedicated to securing our systems and the Services, you are responsible for securing and maintaining the privacy of your password(s) and Account registration information, for example, to choose a password of sufficient length and complexity and not reveal account credentials to any third-parties, and verifying that the Personal Information we maintain about you is accurate and current. We are not responsible for protecting any Personal Information that you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us.

9. Can Children Use the Services?

The Site and the Services are not directed to people under the age of 18 (“Minors”). We do not knowingly collect information, including Personal Information, from Minors or other individuals who are not legally able to use the Site and the Services. If we obtain actual knowledge that we have collected Personal Information from a Minor, we will promptly delete it, unless we are legally obligated to retain such data, and take steps to disable that Account.

10. Third-Party Websites and Social Media Platforms

The Services may contain links to websites and services that are owned or operated by third-parties (each, a “Third-party Service”). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to the owner’s or operator’s privacy policy. We’re not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third-party Services that you access.

Our Services may include access to publicly accessible blogs, forums, or social media platforms. Personal information you voluntarily transmit or publish online in a publicly accessible blog, forum, or social media platform may be viewed and used by others without any restrictions. By using such services, you assume the risk that your personal information may be viewed and used by third-parties for any number of purposes.

11. Others

Changes to This Privacy Policy. We may revise, modify for replace this Privacy Policy from time to time to reflect changes to our business, the Site or the Services, or applicable laws. The revised Privacy Policy will be effective as of the published effective date. If the revised version includes a substantial change, we will provide you with a prior notice by posting notice of the change on the “Policy Update” page of our website. We also may notify Users of the change using email or other means.

Transfers of Your Personal Information to Other Countries. Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. By using our Sites and the Services, you agree that all information collected via or by this Site may be transferred, processed, and stored anywhere in the world, including but not limited to, in the cloud, on our servers, on the servers of our affiliates, or the servers of our service providers, to provide the Services. And you consent to your Personal Information being transferred to other countries, including countries that have different data protection rules than your country. We will protect your information as described in this Privacy Policy if your Personal Information is transferred to other countries. We do not represent that our Sites and the Services are appropriate or available in any particular jurisdiction.

12. Contact Us

You may **contact us** if you have general questions about our Privacy Policy and practices or questions about your Account information or Personal Information. We provide users with the ability to review and correct their personal information where it is inaccurate. You may do this at any time by logging in to your account or by contacting us at contact@calassys.com.



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THANK YOU

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