

# PRIVACY POLICY

November 22, 2023

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE ACCEPTING IT (EXPRESSING YOUR AGREEMENT TO THE TERMS AND CONDITIONS THEREOF).

With this Privacy Policy, we inform you that the Closed Joint Stock Company Dzengi Com, a company registered in the Republic of Belarus under the number 193130368 at the address: Minsk, st. Internatsionalnaya street, 36-1, office 624, room 15 (hereinafter referred to as Dzengi.com), processes your personal data provided by you in the process of concluding, executing, changing, terminating the contract concluded between you and Dzengi.com (hereinafter referred to as the Contract), and explain to you the rights associated with the processing of personal data, the mechanism for the implementation of such rights.

The processing of personal data includes the collection, systematization, storage, modification, use, depersonalization, blocking, distribution, provision, deletion of personal data.

This Privacy Policy is an integral part of the Contract. All terms used in this Privacy Policy should have the same meaning as in the Contract (unless otherwise provided by this Privacy Policy).

**By accepting this Privacy Policy, you give your free, unambiguous consent that we can process your personal data in accordance with the conditions specified in this Privacy Policy.**

## 1. LIST OF PROCESSED PERSONAL DATA

1.1. We collect and process the following personal data:

- (a) personal and contact information (your name, surname, patronymic (if any), citizenship, date and place of birth, place of residence, date of issue of the passport or other identity document, e-mail address, other data obtained when checking personal and contact data);
- (b) data (information) about financial transactions and transactions (operations) with digital tokens (tokens) that are not financial transactions using the Application;
- (c) data (information) about your payment instruments, including data of bank payment cards and virtual wallets;
- (d) communication with you, including sound and video recording of communication (telephone and video calls, correspondence by e-mail and in chats);
- (e) IP address;
- (f) your device ID;
- (g) ID of the operating system you have installed;
- (h) documents and other materials (information) obtained in the course of determining the level of knowledge (competence) for making transactions (operations) for the acquisition of digital tokens (tokens) for money or electronic money (only for citizens of the Republic of Belarus);
- (i) information required to be recognized as a qualified investor (annual income, work experience, education, experience in transactions with securities and (or) derivative financial instruments, transactions with non-deliverable Over-The-Counter financial instruments, etc.);
- (j) information about how you use the Application (for example, connection type, session data);
- (k) any other information that you provide to us (in particular, when communicating with our technical support service).

1.2. We may collect data that, by themselves, does not disclose information about you (i.e., is not data that allows you to identify you personally), including data about the device you use to log into the Application (for example, device type, operating system, language, other device specifications and settings). We may collect, use and distribute such non-personally identifiable data for any other purposes that do not contradict the law, for which such information can be used until it becomes personal data.

## 2. BASIS FOR PROCESSING PERSONAL DATA

2.1. The processing of your personal data specified in letters (a), (b), (c), (d), (h) and (i) of subparagraph 1.1. of paragraph 1 of this Privacy Policy is subject to the requirements of the legislation of the Republic of Belarus and the acts of the Supervisory Board of the Hi-Tech Park, which are mandatory for us. We are obliged to collect the specified personal data so that we can provide you with Services. Thus, if you do not provide us with the above data, we do not have the right to allow you to make transactions with digital tokens (tokens).

2.2. The processing of your personal data specified in letters (e), (f), (g) and (j) subparagraph 1.1. clause 1 of this Privacy Policy is necessary in connection with our legitimate interests. "Legitimate interests" are the interests of Dzengi.com in the effective implementation of its activities, pursued with the aim of constantly improving the quality of the Services provided. The following are our Legitimate Interests that we pursue in collecting your personal data in accordance with this clause:

<b>Personal information</b>	<b>Our legitimate interest</b>
IP address	We need to know your IP address: (a) to determine your location (country only), since we do not want to violate the laws of the state in which you are located, and are also required to comply with special AML / CFT requirements; (b) to conduct marketing attribution and market analysis *.
Your device ID	We need to know your device ID: (a) to "bind" your device to you; (b) to conduct marketing attribution and market analysis *.
ID of the operating system you have installed	We need to know the ID of your operating system in order to conduct marketing attribution and market analysis *.
Information about how you use the Application	We need to know this information in order to be able to effectively provide the Services (maintain and control the smooth operation of the Application, correct errors (eliminate technical failures), improve the quality of the Services provided).

\*Marketing attribution and market analysis allow us to efficiently allocate our funds, optimize marketing costs, including advertising campaign costs.

### 3. REFUSAL OF PERSONAL DATA PROCESSING

3.1. You have the right to refuse processing:

- (a) data required for marketing attribution and analytics;
- (b) the email address used to send you advertising materials (for more details, see subparagraph 5.1 of paragraph 5 of this Privacy Policy);
- (c) data needed for third parties to offer (provide) additional services or facilities to you.

3.2. You can refuse to process this data by sending an application as defined in subparagraph 10.1. clause 10 of this Privacy Policy.

### 4. METHODS FOR PROCESSING PERSONAL DATA

We process personal data in the following ways:

- (a) using automation tools;
- (b) without the use of automation tools.

### 5. PURPOSES OF PERSONAL DATA PROCESSING

5.1. We process your personal data for the following purposes:

<b>Type of personal data</b>	<b>Goals</b>
Data specified in letters (a), (b), (c), (d), (h) and (i) of subparagraph 1.1. clause 1 of this Privacy Policy	(a) ensuring compliance with legislative acts and acts of the Supervisory Board of the Hi-Tech Park, which are mandatory for us; (b) conclusion, performance and termination of the Contract.
The data specified in subparagraph 1.1. clause 1 of this Privacy Policy	For other purposes when we have a legitimate interest in processing them. In particular, our legitimate interests include: (a) maintaining and monitoring the functioning of the Application, protecting our intellectual property rights, communicating with you; (b) sending promotional materials to your email address.

Data specified in letters (e), (f), (g) of subparagraph 1.1. clause 1 of this Privacy Policy	For marketing attribution and marketing automation.
The data specified in subparagraph 1.1. clause 1 of this Privacy Policy	Transfer to third parties to offer (provide) you additional services or facilities from our partners or third parties carrying out activities with digital tokens (tokens) in accordance with Decree No. 8 dated December 21, 2017 “On Digital Economy Development” and other legislation of the Republic of Belarus.

5.2. We guarantee that the processing of personal data is necessary and proportionate to the purposes for which it is carried out.

## 6. EXCHANGE OF PERSONAL DATA

6.1. We have the right to provide your personal data to the following categories of authorized persons (third parties), when it is necessary for the purposes of processing:

- (a) banks, non-bank financial institutions, payment systems and providers with which Dzengi.com interacts, as well as providers of its liquidity;
- (b) advertising platforms (networks) and analytical systems (unless you have refused to process your personal data necessary for marketing attribution and market analysis);
- (c) the providers of the software used by the support team to communicate with you;
- (d) communication service providers, for example, those that send you marketing information, notifications, news, etc.;
- (e) suppliers of software that allows you to take the necessary AML/CFT measures;
- (f) any other authorized persons (third parties).

6.2. If you do not want us to provide your personal data to advertising platforms (networks) and analytical systems, you can contact our support service at [support@dzengi.com](mailto:support@dzengi.com).

6.3. We have the right to provide your personal data to third parties when it is required in accordance with the law and (or) the requirements of state bodies and organizations.

**6.4. Some authorized persons (third parties) to whom we provide your personal data are located in countries where there is no adequate level of personal data protection. You acknowledge and consent to the provision of your personal data to authorized persons (third parties) located in countries where there is no adequate level of personal data protection.**

6.5. All authorized persons (third parties) to whom we provide your personal data receive the minimum amount of personal data that they need for a specific purpose. The use of the information provided to them by authorized persons (third parties) is strictly limited to the purposes of processing personal data described in subparagraph 5.1. clause 5 of this Privacy Policy, and is not allowed for any other purpose. All authorized persons (third parties) to whom we provide personal data are obliged to maintain the confidentiality of personal data and take measures to ensure their protection.

6.6. We do not provide your personal data to third parties who, in our opinion, are not able to provide (ensure) an adequate level of protection of personal data.

6.7. You consent to the processing of your personal data by authorized persons (third parties) specified in subparagraph 6.1. clause 6 of this Privacy Policy, in accordance with the provisions of this Privacy Policy.

## 7. YOUR RIGHTS

7.1. You have the right to:

- (a) at any time, without giving any reason, withdraw your consent to the processing of personal data specified in subparagraph 3.1 of paragraph 3 of this Privacy Policy;
- (b) receive information regarding the processing of your personal data;
- (c) require us to amend our personal data if the personal data is incomplete, outdated or inaccurate;
- (d) receive information from us about the provision of their personal data to third parties;

- (e) require us to stop processing your personal data, including their deletion, in the absence of grounds for processing personal data provided for by the legislation of the Republic of Belarus and (or) acts of the Supervisory Board of the Hi-Tech Park;
- (f) to appeal against our actions (inaction) and decisions that violate your rights when processing personal data, to the authorized body for the protection of the rights of subjects of personal data in the manner prescribed by the legislation of the Republic of Belarus on appeals of citizens and legal entities.

## 8. PERIOD OF PROCESSING PERSONAL DATA

8.1. We store your personal data specified in letters (a) - (c), (h) in subparagraph 1.1. of paragraph 1 of this Privacy Policy **for the entire period of validity of the Contract and for 5 (five) years from the date of termination of the Contract**, since such storage period is provided for by the legislation of the Republic of Belarus and (or) acts of the Supervisory Board of the Hi-Tech Park, which are mandatory for us.

8.2. We keep records of communication with you (letter (d) of subparagraph 1.1 of paragraph 1 of this Privacy Policy) **for 5 (five) years from the date of making such a record**, since such a retention period is provided for by acts of the Supervisory Board of the Hi-Tech Park, which are mandatory for us.

8.3. We store the information necessary to recognize you as a qualified investor (letter (i) of subparagraph 1.1. of paragraph 1 of this Privacy Policy) **for 5 (five) years from the date of receipt**, since such storage period is provided for by the act of the Supervisory Board of the Hi-Tech Park, which is mandatory for us.

8.4. We store any other personal data for the entire duration of the Contract (except for cases when you have refused to process personal data in accordance with subparagraph 3.1 of paragraph 3 of this Privacy Policy), and delete them immediately after termination of the Contract.

## 9. PRIVACY POLICY UPDATES

9.1. We make updates to this Privacy Policy as necessary. You will receive a notification via the Application and/or by e-mail about changes in the Privacy Policy regarding the processing of your personal data, except in cases where such changes will not change your and/or our rights and/or obligations regarding the processing of personal data.

## 10. QUESTIONS AND CLAIMS

10.1. In order to exercise the right to revoke the consent of the personal data subject, the right to receive information concerning the processing of personal data and the modification of personal data, the right to receive information about the provision of personal data to third parties, the right to demand the termination of the processing of personal data and (or) their deletion, you need to submit an application to us in writing at the address Republic of Belarus, 220030, Minsk, Internatsionalnaya street, 36-1, office 624, room 15, or send such an application to us by e-mail [support@dzengi.com](mailto:support@dzengi.com).

10.2. Your application must contain:

- (a) surname, proper name, patronymic (if any), address of residence (place of stay);
- (b) date of birth;
- (c) identification number, in the absence of such a number – the number of the identity document, in cases where this information was indicated by you when giving your consent to us or the processing of personal data is carried out without your consent;
- (d) statement of the essence of the requirements;
- (e) personal signature or electronic digital signature.

10.3. The response to the application is sent to you in the form corresponding to the application form, unless otherwise specified in the application itself.

10.4. Any suggestions, questions regarding this Privacy Policy, please send to [privacy@dzengi.com](mailto:privacy@dzengi.com).