

PRIVACY POLICY

Assetara Limited

Effective Date: March 3, 2026

1. INTRODUCTION

This Privacy Policy ("**Policy**") describes how Assetara Limited, a company incorporated in the Republic of Seychelles under registration number 246868 with registered address at Providence Industrial Estate, Victoria, Seychelles ("**Company**", "**we**", "**us**", or "**our**"), collects, uses, processes, stores, and discloses personal data of individuals who access and use the Assetara platform and services.

The Assetara platform ("**Platform**") is accessible through the website assetara.ai, associated mobile applications, and smart contracts deployed on the BNB Chain blockchain.

This Policy applies to:

- **Visitors:** individuals who browse the Platform without registering
- **Users:** individuals who register an account and use the Services

This Policy should be read in conjunction with our Terms of Use available at <https://assetara.ai/terms>.

By accessing or using the Platform, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree, you must immediately cease using the Platform.

2. DATA CONTROLLER

Assetara Limited is the data controller responsible for your personal data. We are committed to protecting your privacy and fundamental rights in accordance with applicable data protection laws, including:

- The Seychelles Data Protection Act 2023
- The General Data Protection Regulation (GDPR) where applicable
- Other relevant international data protection standards

We implement "privacy by default" and "privacy by design" principles in all our operations.

3. LEGAL BASIS FOR PROCESSING

We process your personal data based on the following legal grounds:

3.1 Contractual Necessity

Processing is necessary for the performance of the Terms of Use to which you are a party, including:

- Account creation and management
- Transaction processing
- Service delivery

3.2 Legal Obligation

Processing is necessary to comply with legal obligations, including:

- Anti-Money Laundering (AML) regulations
- Counter-Terrorist Financing (CTF) requirements
- Know Your Customer (KYC) procedures
- Tax reporting obligations
- Court orders and regulatory requests

3.3 Legitimate Interests

Processing is necessary for our legitimate interests, including:

- Platform security and fraud prevention
- Service improvement and analytics

- Network and information security
- Internal business administration

3.4 Consent

Where required by law, we obtain your explicit consent for:

- Marketing communications
- Optional features requiring additional data processing
- Cookies and tracking technologies

You may withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

4. DATA WE COLLECT

We collect the following categories of personal data:

4.1 Account and Identity Data

- Full name
- Email address
- Password (encrypted and hashed)
- Date of birth
- Country of residence
- Cryptocurrency wallet address(es)
- Username or display name
- Account registration timestamp

4.2 KYC and AML Verification Data (when required)

- Government-issued identification documents (passport, national ID, driver's license)
- Proof of address documents (utility bills, bank statements)
- Selfie photographs for identity verification
- Source of funds information
- Beneficial ownership information (for corporate accounts)
- Politically Exposed Person (PEP) status
- Sanctions screening results

4.3 Financial and Transaction Data

- Deposit and withdrawal transaction history
- Trading activity and order history
- Investment plan participation and balances
- Staking pool participation and rewards
- Token purchase history (ASRA ICO participation)
- Wallet balances and asset holdings
- Transaction amounts, timestamps, and blockchain addresses
- Gas fees and transaction costs

4.4 Technical and Usage Data

- IP address and geolocation data
- Device type, model, and operating system
- Browser type and version
- Mobile device identifiers (IDFA, Android ID)
- Session duration and activity timestamps
- Pages viewed and features accessed
- Click-stream data and navigation patterns
- API request logs
- Error logs and crash reports

4.5 Referral and Rewards Program Data

- Referral codes and links generated
- Referrer and referee relationships
- Commission earnings and bonuses
- Referral network structure
- Reward claim history

4.6 Communication and Support Data

- Email correspondence
- Support ticket messages
- Live chat transcripts
- Communication preferences
- Newsletter subscription status
- Feedback and survey responses

4.7 Blockchain Data

As a non-custodial platform, certain data is recorded immutably on public blockchains:

- Transaction hashes
- Smart contract interactions
- Wallet addresses
- Token transfers and balances

Important: Blockchain data is permanent, public, and cannot be deleted or modified by Assetara.

5. HOW WE COLLECT DATA

5.1 Direct Collection

Data you provide directly when:

- Creating an account
- Completing KYC verification
- Making deposits or withdrawals
- Contacting customer support
- Participating in surveys or promotions
- Subscribing to communications

5.2 Automatic Collection

Data collected automatically when you use the Platform:

- Technical data through cookies and similar technologies
- Usage analytics through third-party tools
- Log files and server records
- Blockchain transaction monitoring

5.3 Third-Party Sources

Data received from:

- KYC/AML verification service providers
- Blockchain explorers and analytics platforms
- Fraud prevention and security services

- Payment processors
- Public databases and sanctions lists

6. PURPOSES OF DATA PROCESSING

We use your personal data for the following purposes:

6.1 Service Provision

- Creating and maintaining your Assetara account
- Processing transactions and managing balances
- Facilitating deposits, withdrawals, and transfers
- Operating investment plans and staking pools
- Executing ASRA token purchases and distributions
- Processing referral rewards and bonuses
- Providing access to the AI Trading Engine

6.2 Regulatory Compliance

- Conducting KYC/AML verification procedures
- Sanctions and PEP screening
- Preventing money laundering and terrorist financing
- Meeting regulatory reporting requirements
- Responding to legal requests and court orders
- Maintaining required records and documentation

6.3 Platform Security

- Preventing fraud, abuse, and unauthorized access
- Detecting and investigating suspicious activity
- Monitoring for market manipulation
- Implementing security measures and access controls
- Protecting against cyber attacks and threats

6.4 Customer Support

- Responding to inquiries and support requests
- Resolving technical issues and disputes
- Providing platform guidance and assistance
- Processing complaints and feedback

6.5 Analytics and Improvement

- Analyzing platform usage and performance
- Improving user experience and interface design
- Developing new features and services
- Conducting market research
- Optimizing AI Trading Engine algorithms

6.6 Marketing and Communications

- Sending service-related notifications and updates
- Providing newsletters and promotional materials (with consent)
- Announcing new features and products
- Conducting surveys and requesting feedback

6.7 Business Operations

- Internal record-keeping and administration
- Financial reporting and accounting
- Business planning and strategy
- Mergers, acquisitions, or asset sales

7. DATA SHARING AND DISCLOSURE

We do not sell your personal data to third parties. We may share your data with the following categories of recipients:

7.1 Service Providers

- KYC/AML verification providers (identity verification services)
- Cloud hosting and infrastructure providers
- Payment processors and banking partners
- Customer support and communication platforms
- Analytics and monitoring tools
- Security and fraud prevention services
- Email and marketing automation services

All service providers are bound by contractual obligations to protect your data and use it only for specified purposes.

7.2 Legal and Regulatory Authorities

We may disclose data when required by law or in good faith belief that disclosure is necessary:

- To comply with legal obligations, court orders, or regulatory requests
- To respond to lawful requests from government authorities
- To report suspicious activity to financial intelligence units
- To cooperate with law enforcement investigations
- To enforce our Terms of Use or protect our rights

7.3 Business Transfers

In the event of a merger, acquisition, reorganization, asset sale, or bankruptcy, your personal data may be transferred to the successor entity, subject to the same privacy protections.

7.4 Professional Advisors

- Legal counsel, accountants, auditors, and consultants bound by confidentiality obligations

7.5 With Your Consent

We may share data with other third parties when you provide explicit consent.

8. INTERNATIONAL DATA TRANSFERS

Your personal data may be transferred to, stored, and processed in countries outside the Republic of Seychelles, including:

- European Union member states
- United States
- Singapore
- Other jurisdictions where our service providers operate

When transferring data internationally, we ensure adequate protection through:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Adequacy decisions recognizing equivalent data protection standards
- Binding Corporate Rules or other approved transfer mechanisms
- Encryption and security measures during transmission

You have the right to request information about the safeguards we use for international transfers by contacting legal@assetara.ai.

9. DATA RETENTION

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this Policy and to comply with legal obligations.

9.1 Retention Periods

Data Category	Retention Period
Account and identity data	Duration of account + 7 years after closure
KYC/AML documentation	7 years after account closure (regulatory requirement)
Transaction records	7 years after transaction date
Communication records	3 years after last communication
Technical and usage logs	2 years
Marketing consent records	Until consent withdrawn + 1 year

9.2 Blockchain Data

Data recorded on blockchain networks is permanent and immutable. Assetara cannot delete or modify blockchain records.

9.3 Account Deletion

Upon account deletion, we will:

- Deactivate your access immediately
- Delete or anonymize personal data not required for legal compliance
- Retain required data (KYC, transaction records) for regulatory periods
- Inform you of data that cannot be deleted due to legal obligations

10. DATA SECURITY

We implement industry-standard technical and organizational measures to protect your personal data:

10.1 Technical Measures

- End-to-end encryption for data transmission (TLS 1.3)
- AES-256 encryption for data at rest
- Secure password hashing (bcrypt with salt)
- Two-factor authentication (2FA) support
- Regular security audits and penetration testing
- Intrusion detection and prevention systems
- DDoS protection and rate limiting
- Secure smart contract architecture

10.2 Organizational Measures

- Access controls and role-based permissions
- Employee confidentiality agreements
- Regular security training for staff
- Data protection impact assessments
- Incident response and breach notification procedures
- Vendor security requirements and audits

- Regular backup and disaster recovery protocols

10.3 Non-Custodial Security

As a non-custodial platform, you maintain exclusive control of your private keys and cryptocurrency assets. Assetara never has access to your private keys. You are solely responsible for:

- Securing your private keys and seed phrases
- Protecting your account credentials
- Using secure devices and networks
- Reporting unauthorized access immediately

No security system is impenetrable. While we strive to protect your data, we cannot guarantee absolute security and are not liable for breaches caused by circumstances beyond our reasonable control.

11. YOUR RIGHTS

Under applicable data protection laws, you have the following rights:

11.1 Right of Access

You may request a copy of the personal data we hold about you.

11.2 Right to Rectification

You may request correction of inaccurate or incomplete personal data.

11.3 Right to Erasure ("Right to be Forgotten")

You may request deletion of your personal data, subject to:

- Legal retention obligations (KYC, transaction records)
- Immutability of blockchain data
- Legitimate business interests

11.4 Right to Restriction

You may request limitation of processing in certain circumstances, such as while contesting data accuracy.

11.5 Right to Data Portability

You may request a copy of your data in a structured, commonly used, machine-readable format.

11.6 Right to Object

You may object to processing based on legitimate interests or for direct marketing purposes.

11.7 Right to Withdraw Consent

Where processing is based on consent, you may withdraw it at any time without affecting prior lawful processing.

11.8 Right to Lodge a Complaint

You may file a complaint with the Seychelles Data Protection Commissioner or your local supervisory authority:

- **Seychelles:** Office of the Data Protection Commissioner, Liberty House, Victoria, Seychelles

11.9 Exercising Your Rights

To exercise your rights, contact us at:

- **Email:** legal@assetara.ai
- **Subject line:** "Data Subject Rights Request"
- **Include:** Full name, registered email, description of request, identification verification

We will respond to verified requests within **30 days** (may be extended by an additional 60 days for complex requests).

12. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar technologies to enhance your experience and analyze platform usage.

12.1 Types of Cookies

Cookie Type	Purpose	Retention
Essential	Authentication, security, session management	Session/1 year
Functional	User preferences, language settings	1 year
Analytics	Usage statistics, performance monitoring	2 years
Marketing	Advertising, campaign tracking (with consent)	1 year

Table 1: Cookie categories and retention periods

12.2 Third-Party Cookies

We may use third-party analytics services (e.g., Google Analytics, Mixpanel) that set their own cookies. These services have their own privacy policies.

12.3 Cookie Management

You can control cookies through:

- Browser settings (block, delete, or receive alerts)
- Cookie consent banner on our website
- Opt-out tools provided by third parties

Note: Disabling essential cookies may impair platform functionality.

13. CHILDREN'S PRIVACY

The Assetara platform is not intended for individuals under 18 years of age. We do not knowingly collect personal data from children.

If we discover that we have inadvertently collected data from a person under 18, we will:

- Delete the data promptly
- Terminate the associated account
- Notify the user (if contact information is available)

If you believe a child has provided us with personal data, please contact us immediately at legal@assetara.ai.

14. AUTOMATED DECISION-MAKING

We may use automated processing, including profiling, for:

- Fraud detection and risk assessment
- KYC/AML screening and verification
- AI Trading Engine optimization
- Personalized service recommendations

You have the right to:

- Request human review of automated decisions
- Express your point of view
- Contest decisions with legal or significant effects

Automated decisions that significantly affect you will be subject to appropriate safeguards and human oversight.

15. DATA BREACH NOTIFICATION

In the event of a personal data breach that is likely to result in a high risk to your rights and freedoms, we will:

- Notify affected users **within 72 hours** of becoming aware of the breach
- Describe the nature, extent, and potential consequences

- Provide recommended measures to mitigate adverse effects
- Notify relevant supervisory authorities as required by law

Notifications will be sent to your registered email address. Please ensure your contact information is current.

16. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect:

- Changes in legal requirements
- New services or features
- Improvements in data practices
- User feedback

Material changes will be communicated through:

- Email notification to registered users
- Prominent notice on the Platform
- In-app notification

The "**Effective Date**" at the top indicates the latest revision. Continued use of the Platform after changes constitutes acceptance of the updated Policy.

We encourage you to review this Policy periodically.

17. CONTACT INFORMATION

For questions, concerns, or requests regarding this Privacy Policy or your personal data, please contact:

Data Protection Officer

Assetara Limited
Providence Industrial Estate
Victoria, Seychelles

Email: legal@assetara.ai

Support: support@assetara.ai

Website: <https://assetara.ai>

Response time: We aim to respond to all inquiries within 5-7 business days.

18. JURISDICTION-SPECIFIC PROVISIONS

18.1 European Economic Area (EEA) Users

If you are located in the EEA, you have additional rights under GDPR, including:

- Enhanced transparency requirements
- Strengthened consent provisions
- Right to data portability
- Right to lodge complaints with your national data protection authority

Our EU representative (if appointed) can be contacted through legal@assetara.ai.

18.2 California Residents (CCPA)

If you are a California resident, you have rights under the California Consumer Privacy Act, including:

- Right to know what personal information is collected
- Right to delete personal information (with exceptions)
- Right to opt-out of "sale" of personal information
- Right to non-discrimination for exercising your rights

We do not sell personal information as defined by CCPA.

To exercise California rights, email legal@assetara.ai with "California Privacy Rights" in the subject line.

18.3 Other Jurisdictions

Users in other jurisdictions may have additional rights under local data protection laws. Contact us to inquire about rights specific to your location.

BY USING THE ASSETARA PLATFORM, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTOOD, AND AGREE TO THIS PRIVACY POLICY.

Assetara Limited — Your Capital. Optimized by AI. Protected by Blockchain.

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