

Privacy Policy

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING MESSIA.

Last Updated: September 1, 2022

Our Commitment to Privacy

MESSIA is committed to protecting your Personal Information (as defined below) by ensuring that your Personal Information is treated with care and is not used or disclosed in ways to which you have not consented or as described in this privacy policy ("Policy"). This Policy explains the ways in which we collect, use, and disclose your Personal Information. It applies to any Personal Information that is collected by us, whether it is collected over the telephone, in writing, or electronically, including through any of our websites, mobile applications, or other digital platforms, online products or services that link to this Privacy Policy (each a "Platform" and collectively, the "Services").

We will only use your Personal Information in accordance with this Policy, unless otherwise permitted or required by applicable law. Please read this Policy carefully to understand our policies and practices for collecting, using, disclosing, processing, storing and deleting your Personal Information. By providing us with your Personal Information and using our Services, you indicate your acceptance of this Policy, as well as any other terms that are described to you when your Personal Information is collected. If you do not agree with or are not comfortable with any aspect of this Policy, please do not use the Services or otherwise provide your Personal Information to us.

Changes to this Privacy Policy

We may modify, revise or update this Policy at any time by updating this posting. We include the date the Policy was last revised at the top of the page. Each time you use the Services, the version of this Policy then posted will apply to that use, so you should check this page each time you use the Services. If we make material changes to how we treat Personal Information, we will post a notice on the homepage of our Platform and email notice of the change to registered users of our Platforms. You are responsible for ensuring we have up-to-date, active, and deliverable contact information for you, and for periodically visiting this page to check for any changes. Any modifications to this Privacy Policy will be effective upon our posting of the new terms. In all cases, your continued use of our Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy. If you disagree with any change to this Policy, please refrain from using our Service or otherwise providing us with your Personal Information.

What is Personal Information?

"Personal Information" is information about an identifiable individual. This includes information that we can reasonably use on its own, or with other information we have, to identify directly or indirectly an individual. Personal Information generally does not include business contact information, including your name, title, or business contact information. The definition of Personal Information depends on the applicable law based on your physical location. Only the definition that applies to your physical location will apply to you under this Policy.

What Information Do We Collect and How?

The information we collect, and how that information is used, depends on how you use our Services.

Personal Information

Personal Information Collected Directly From You. Personal Information is collected by MESSIA when you provide it to us, such as when you provide us with your contact information or send us a question or comment through the Services, when you meet with us in person, or when you phone us with an inquiry.

- MESSIA may collect the following types of Personal Information directly from you:
- your contact information such as your name, email address and phone number(s);
- information to establish an account with our Services, including a username and password chosen by you;
- digital asset addresses and electronic wallet addresses used to send and receive payments;
- your transaction history and account activity with us; and
- your comments and questions and other Personal Information you choose to share with us.

We may not be able to serve you as effectively or offer you our services if you choose not to share certain Personal Information with us. Any Personal Information you provide to us that is not required is voluntary.

We engage third party service providers to collect and assess any information required to fulfil know your client/anti-money laundering ("KYC/AML") and know your token ("KYT") requirements. Such information may include your full legal name, date of birth, photograph and residential address; name and confirmation of a financial account or credit file; and details associated with government-issued photo identification cards/documents and utility bills. This information is not shared with MESSIA and we are only provided a summary report of the results, which contains personal information that we already have on record for you. Please familiarize yourself with the privacy policies of these third-party service providers.

All transactions take place between users of the Platform. MESSIA is acting in the capacity of a service provider facilitating such transactions and is not a party to any transaction. All payments for transactions are processed by third party service providers. Payment and banking information is collected and stored by those providers and is subject to their privacy policies. Please familiarize yourself with the privacy policies of those payment providers before using their services.

If you sign-up for marketing and promotion communications, we may ask for your contact information such as your name and email address. You can choose to unsubscribe from such marketing and promotion communications at any time as described below under the heading entitled "Your Privacy Preferences".

Personal Information Collected from Third Parties. MESSIA or our agents or service providers may receive information about you from third parties and through publicly available sources, including the following:

- **Public Databases, Credit Bureaus & ID Verification Partners.** Our KYC/AML and KYT service providers may obtain information about you from public databases and ID verification partners for purposes of verifying your identity in accordance with applicable law, to comply with legal obligations such as anti-money laundering laws. In some cases, we may process additional data about you to assess risk and ensure our Services are not used fraudulently or for other illicit activities. In such instances, processing is necessary for us to continue to perform our contractual obligations with you and others.

- **Blockchain Data.** We may analyse public blockchain data to ensure parties utilizing our Services are not engaged in illegal or prohibited activity under our Terms of Use, and to analyse transaction trends for research and development purposes.
- **Joint Marketing Partners.** Unless prohibited by applicable law, joint marketing partners may share information about you with us so that we can better understand which of our Services may be of interest to you.
- **Advertising Networks & Analytics Providers.** We work with these providers to provide us with de-identified information about how you found our Platform and how you interact with the Platform and Services. For more information on how you can manage collection of this information, please refer to the section entitled “Your Privacy Preferences” below.

Technical Information

When you visit MESSIA, we may automatically collect the following information, which we refer to as “Technical Information” in this Policy. Technical Information is generally used on an aggregate and anonymized basis and in a non-personally identifiable form, but if we can or do use your Technical Information to identify you, including by sending you targeted advertising (as described below), we treat such Technical Information as Personal Information in accordance with this Policy.

- **Usage details.** We may automatically collect certain details of your access to and use of our Platform, including traffic data, location data, logs and other communication data and resources that you interact with on or through the Platform, such as individual pages or products that you view and what websites or search terms referred you to the Platform.
- **Device information.** We may collect information about your device and internet connection, including the device’s unique device identifier, IP address, MAC address, operating system, browser type, mobile network information, and the device’s telephone number (where applicable).

The technologies we use for this automatic data collection may include:

- **Cookies** are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies on your browser, visit <https://www.allaboutcookies.org/>. When using an app, it may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you disable browser cookies or refuse to accept mobile cookies, you may be unable to use certain features or access certain parts of the Platform.
- **Log files.** Log files track actions occurring on the Platform, and collect data including your IP address, MAC address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- **Web beacons.** Small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) permit us, for example, to count users who have visited certain pages and other related statistics (for example, recording the popularity of certain content and verifying system and server integrity).

For What Purposes Do We Collect Your Information?

Personal Information

Generally, we collect and use Personal Information to:

- fulfil the purposes for which you provided it or that were described when it was collected, or any other purpose for which you consented;
- provide you with information, products, or services that you request from us and to improve them;
- communicate with you, respond to your inquiries, provide you with technical and customer support;
- meet our legal, regulatory, audit, security and financial requirements under applicable law;
- manage our risk, including fraud, money laundering, terrorist financing and other risk;
- send you press releases, marketing materials or information about scheduled events for which we have your consent to receive under applicable law;
- administer contests, surveys, or other Platform features in which you have chosen to participate;
- provide you with targeted advertisements or other behavioural marketing (as described below); and
- investigate any violations of, and enforce compliance with, our Terms of Use and other terms and conditions of use.

We do not collect more Personal Information than we require for the purposes for which Personal Information is being collected unless we are required or permitted by law to collect additional information. We will notify the individual from whom the information is collected of the purposes for which we are collecting the information. This notice will be provided at or before the time that we collect the Personal Information. Depending on the way in which Personal Information is collected, this may be done orally or in writing. Other than as required or allowed by law, your Personal Information will not be used for any other purpose without your consent.

Technical Information

Technical Information may be used for the following purposes:

- for Platform and system administration purposes;
- to improve the performance of the Platform and our Services;
- to provide you with a streamlined and personalized experience;
- to keep track of your specified preferences;
- to conduct internal reviews of the number of visitors to the Platform;
- to help us better understand how users interact with our Platform;
- to respond to customer support and other specific requests from users; and
- to prevent fraudulent activity and protect the security or integrity of our Platform.

To Whom Do We Disclose Your Information?

We do not sell or rent Personal Information. We may disclose Personal Information that we collect as described in this Policy with your consent for any other purpose we disclose when you provide the information or as permitted or required by applicable law. When Personal Information that has been collected is to be used for a purpose that we have not previously identified, we will obtain your consent for the new purpose, unless the new purpose is required or permitted by law.

We may disclose aggregated and anonymized information, which no longer allows an individual to be directly or indirectly identified, for study or research purposes or to produce statistics.

We may share or disclose your Personal Information in the following circumstances:

- **Subsidiaries and Affiliates.** To our subsidiaries and affiliates for the purposes that you consented to.
- **Service Providers.** To contractors, service providers, technology providers and other affiliated or third parties we use to support our business. For instance, we use service providers to host our servers, send communications on our behalf, conduct KYC/AML and KYT compliance and process transactions. Our service providers are given access to the information they need to perform their designated functions for uses you have consented to, and we do not authorize them to use or disclose personal information for any other purposes, including their own purposes or the purposes of any third party. Service providers are also required to have appropriate security measures in place to protect your Personal Information whether it is in transit or in storage.
- **Sale or Business Transaction.** In accordance with applicable law, to a buyer or other successor in the event of a proposed and completed merger, divestiture, restructuring, reorganization, dissolution, other sale or transfer or business transaction involving all or part of our company or our assets, including for the purposes of determining whether to proceed with such transaction.
- **Law Enforcement.** MESSIA, our affiliates and related companies may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law.
- **Enforce our Rights.** We may also disclose personal information where necessary for the establishment, exercise or defence of legal claims, or as otherwise permitted by law, including to enforce our rights arising from our Terms of Use and any other contracts between you and us.
- **Protect our Rights.** If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for fraud prevention and credit risk reduction.

Collection of Information from Minors

Our Services are not intended for use by and we do not knowingly collect any personal information from minors, i.e., those under the age of majority in their jurisdiction of residence or not legally capable of entering into a contract. If you are a minor, you may not use the Services. If we discover that we have such information in our possession, we will destroy it.

Use of Automated Systems

We may use both manual and automated systems, such as machine learning and artificial intelligence, to: analyse your Personal Information and Technical Information to improve our Platform; make decisions; personalize your experience; automate certain aspects of the Platform; aggregate, de-identify or anonymize your information; provide you certain features; and protect the safety and security of our Platform.

Targeted Advertising

We may use the technologies described above under the heading “Technical Information” to collect information about your activities over time and across third party websites, apps or other online services (i.e., behavioural tracking), so that we can tailor our advertising to you that suits your interests, preferences and usage patterns.

We may use the information we have collected from you to display advertisements to our advertisers’ target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Personal Information may be used by MESSIA and disclosed to Facebook for the purpose of delivering targeted advertising to you and other individuals on Facebook and for building lookalike audiences, using Facebook’s Custom Audiences and Lookalike Audiences features.

Third Party Information Collection. When you download or use the Platform or its content, certain third parties may collect information about you or your device. These third parties may include:

- advertisers, ad networks, and ad servers
- analytics companies
- your mobile device manufacturer
- your mobile service provider
- the third party app provider/vendor.

These third parties may use cookies alone or in conjunction with other tracking technologies to collect information about you when you use the Platform. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites, apps and other online services. They may use this information to provide you with behavioural advertising or other targeted content. We do not control these third parties’ tracking technologies or how they use them. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

In addition to helping advertisers reach the right people for their products and services, behavioural advertising helps support the Platform so that you can enjoy free content. To learn more about how targeted advertising works, you can visit the Network Advertising Initiative’s educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>. For information on how to opt-out of targeted advertisings, please see the section entitled “Your Privacy Preferences” below.

Security Safeguards

Our Obligation

We implement security safeguards to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. We use physical, organizational and technological measures to protect Personal Information, such as locked filing cabinets, firewalls, encryption, and employee education. The measures we take will vary depending on the sensitivity, format, location, and storage of the Personal Information. We ensure that our service providers are contractually obligated to adhere to appropriate security safeguards.

You should be aware that there is a residual risk in transmitting any data electronically. Despite our efforts, no security measures are perfect or impenetrable and no method of data transmission can be guaranteed against any interception or other type of misuse. This risk is inherent in all Internet dealings.

Your Obligations

The safety and security of your Personal Information also depends on you. While many of our Services are publicly accessible, access to your account information and some of our Services are accessible only through the use of an individual user ID and password. To protect the confidentiality of Personal Information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe that the confidentiality of your password has been compromised or that your password has been misused. In addition, always log out and close your browser when you finish your session. Please note that we will never ask you to disclose your password in an unsolicited phone call or email. MESSIA IS NOT RESPONSIBLE FOR ACTIONS TAKEN REGARDING YOUR ACCOUNT WHILE A USER IS LOGGED IN USING YOUR USER ID AND P A S S W O R D .

We are not responsible for losses due to blockchains or any other features of the Platform, the Protocols, our service providers or any electronic wallet, including but not limited to late report by developers or representatives (or no report at all) of any issues with the Protocols, including forks, technical node issues, or any other issuers having fund losses as a result.

Retention & Disposal of Personal Information

We will keep Personal Information only for as long as it remains necessary for the purposes for which it was collected, to fulfil our legal, regulatory or reporting requirements, or as required by applicable law. There is no single retention period applicable to the various types of personal information collected. Please contact us if you would like to delete any personal information we hold about you, where provided for by applicable law as described below under the heading “Your Privacy Rights”.

Note that we will retain Personal Information to the extent necessary to send you marketing communications in accordance with your marketing preferences, which you can change at any time as described below under the “Your Privacy Preferences” heading. We also reserve the right to continue to hold Personal Information about you to the extent it is required to be held by us by applicable law, rule or regulation.

When your Personal Information is no longer required, we will make all reasonable efforts to ensure all electronic and hard copies of such information are securely destroyed or anonymized. However, where your information has been provided to third parties for certain purposes, such as payment processing, those third parties, such as payment processors and financial institutions, may retain the information according to their own retention and privacy policies.

Under some circumstances we may instead anonymize your Personal Information so that at all times it is reasonable to expect in the circumstances that it irreversibly no longer allows you to be directly or indirectly identified. We reserve the right to use such anonymized information for any serious and legitimate purpose without further notice to you or your consent, as permitted by applicable law.

Cross Border Data Transfers

Your Personal Information may be processed or stored on servers or cloud providers located outside of the jurisdiction in which such information was originally collected. As a result, your Personal Information may be subject to the laws of such foreign jurisdiction and may be accessible without

notice to you by the courts, law enforcement and national security authorities of that jurisdiction. You can obtain more information about our policies and practices with respect to the use of non-Canadian service providers by contacting us as described below under the “Contact Us” heading.

Links to Third Party Platforms

Our Services may provide links or references to websites or other platforms operated by third parties. These third-party platforms are not governed by this Policy but by other privacy policies that may differ from our Policy. This Policy does not extend to the collection of Personal Information by these third parties, and we do not assume any responsibility for the privacy practices, policies or actions of third parties. In visiting any third-party platforms, whether linked to our Services or otherwise, you do so at your own risk and you assume all responsibility in that regard. We make no representations or warranties regarding, and do not endorse, any third-party platforms or any content in such platform. We encourage you to review the privacy policies of each platform visited before using those platforms or disclosing any Personal Information to third parties.

Your Privacy Rights

You have certain rights with respect to your Personal Information that we collect and process, such as described below. Your privacy rights differ depending on your jurisdiction of residence. To exercise any of your privacy rights, please contact us as set out below under the “Contact Us” heading.

Your Privacy Preferences

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following controls over your information:

- **Cookies.** For more information about cookies, and how to disable cookies on your browser, visit <https://www.allaboutcookies.org/>. When using a mobile application, it may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you disable browser cookies or refuse to accept mobile cookies, you may be unable to use certain features or access certain parts of the Platform.
- **Google Analytics.** You can opt out of Google Analytics without affecting how you visit the Platform. For more information on opting-out of Google Analytics across all websites you use, visit this Google page:
- https://support.google.com/analytics/answer/181881?hl=en&ref_topic=2919631
- **Targeted Advertising.** You can opt-out of targeted advertising by visiting the Digital Advertising Alliance’s opt-out portal at: <https://optout.aboutads.info/?c=3&lang=en> (Canadian users) or <http://optout.aboutads.info/> (U.S. users). Please note that we do not alter our Platform’s data collection and use practices when we see a Do Not Track signal from your browser. You can opt-out of several third party ad servers’ and networks’ cookies simultaneously by using the opt-out tool created by the Digital Advertising Alliance. You can also access these websites to learn more about online behavioural advertising and how to stop websites from placing cookies on your device. Note that opting out does not mean you will no longer receive online advertising. It does mean that the network from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.
- **Marketing & Promotional Communications.** You may choose not to receive marketing and promotional emails, text messages, direct messages or other electronic communications from us by declining to receive such communications at the time of registration or at the time you otherwise provide your Personal Information to us. You may also opt-out of receiving

marketing and promotional emails, text messages, direct messages or other electronic communications from us by following the instructions in those communications or by sending an email to support@messia.io. Note that if you opt out, we may still send you transactional messages such as emails about your account, our ongoing business relationship or your use of our Platform.

Contact Us

We are accountable for all Personal Information in our custody and control and have designated an individual, who is ultimately accountable for the handling of such Personal Information and for ensuring that the principles described in this Policy are being complied with. If you have any concerns, complaints, would like to exercise your privacy rights, or would like further information regarding our privacy policies or practices, please contact us at support@messia.io.