

## **CL - Global Privacy Policy**

Last updated: December 2022

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The protection of the personal data of customers and visitors to our websites is important to CL (see definition below).

This privacy policy describes our data handling practices when you access our services, including our content on other websites, pages, features or content owned or operated by us (collectively the "Website (s)"), or if you are using the CL mobile app, the CL Cards app (such as defined below), any API or third-party applications based on such API and related services (hereinafter collectively referred to as "Services").

Please read this data protection declaration carefully. If you have any questions about this privacy policy, you can send us a request via the support portal at [gdpr@cl-cards.com](mailto:gdpr@cl-cards.com).

Use of the words "CL," "Frozen Time," "we," "us," or "our" refer to any or all CL entities and their affiliates. This Privacy Policy explains what Personal Data (as defined below) we collect, why we collect it, how we use and disclose it.

Your privacy matters to us so whether you are new to CL or a long-time customer, please do take the time to get to know and familiarize yourself with our policies and practices. Feel free to print and keep a copy of this Privacy Policy, but please understand that we reserve the right to change any of our policies and practices at any time. But don't worry, you can always find the latest version of this Privacy Policy here on this page.

This table describes which CL entity or entities you are engaging with, which determines the means and purposes of processing your Personal Data:

YOUR PLACE OF RESIDENCY	SERVICES PROVIDED	ENTITY
UK	Fiat services	Optimus Cards UK Ltd, De Montfort House, High Street, Coleshill, Birmingham, B46 3BP.
	Digital Asset services	Frozen Time UNIPessoal LDA, Urbanização Algarvesol, Lote 1, Fonte Santa, Quarteira, freguesia de Quarteira, Concelho de Loulé.
Europe	Fiat services	UAB Finansinès paslaugos Contis Mėnulis g. 11-101, 04326, Vilnius
	Digital Asset services	Frozen Time UNIPessoal LDA, Urbanização Algarvesol, Lote 1, Fonte

Santa, Quarteira, freguesia de  
Quarteira, Concelho de Loulé.

## **1. Personal Data We Collect**

As used herein, “Personal Data” means information that identifies or is reasonably capable of identifying an individual, directly or indirectly, and information that is being associated with an identified or reasonably identifiable individual.

### *A. Personal Data we collect from you*

We may collect the following categories of Personal Data directly from you:

- Identification Information, such as name, email, phone number, postal address, government identification numbers (which may include Social Security Number or equivalent, driver’s license number, passport number);
- Commercial Information, such as trading activity, order activity, deposits, withdrawals, account balances;
- Financial Information, such as bank account information, routing number, bank statements or utility bills;
- Correspondence, such as information that you provide to us in correspondence, including account opening and customer support;
- Sensory Information, such as images collected for identity verification, audio recordings left on answering machines and video recordings;
- Employment Information, such as job title, source of wealth; and
- Institutional Information, such as for institutional customers, we may collect additional information, including: institution’s legal name, Employer Identification Number (“EIN”) or

any comparable identification number issued by a government, and proof of legal existence (which may include articles of incorporation, certificate of formation, business license, trust instrument, or other comparable legal documents).

#### *B. Personal Data we collect automatically*

We may collect the following categories of Personal Data automatically through your use of our services:

- Online Identifiers, such as IP address; domain name;
- Device Information, such as hardware, operating system, browser;
- Usage Data, such as system activity, internal and external information related to CL pages that you visit, clickstream information; and
- Geolocation Data.

Our automatic collection of Personal Data may involve the use of Cookies, described in greater detail below.

#### *C. Personal Data we collect from third parties*

We may collect and/or verify the following categories of Personal Data about you from Third Parties:

- Identification Information, such as name, email, phone number, postal address, government identification numbers (which may include Social Security Number or equivalent, driver's license number, passport number);
- Financial Information, such as bank account information, routing number, bank statements or utility bills;
- Transaction Information, such as public blockchain data (bitcoin, ether, and other Digital Assets are not truly anonymous. We, and any others who can match your public Digital Asset address to other Personal Data about you, may be able to identify you from a blockchain transaction because, in some circumstances, Personal Data published on a blockchain (such as your Digital Asset address and IP address) can be correlated with Personal Data that we

and others may have. Furthermore, by using data analysis techniques on a given blockchain, it may be possible to identify other Personal Data about you); and

- Additional Information, at the discretion of our Compliance Team to comply with legal obligations, which may include criminal records or alleged criminal activity.

Personal Data you provide during the registration process may be retained, even if your registration is left incomplete or abandoned.

#### *D. Accuracy and retention of Personal Data*

We take reasonable and practicable steps to ensure that your Personal Data held by us (i) is accurate with regard to the purposes for which it is to be used, and (ii) is not kept longer than is necessary for the fulfillment of the purpose for which it is to be used. Please visit our CL - Data Retention Policy for more detailed information.

## **2. How We Use Your Personal Data**

The Personal Data we collect and the practices described above are done in an effort to provide you with the best experience possible, protect you from risks related to improper use and fraud, and help us maintain and improve CL. We may use your Personal Data to:

A. Provide you with our services. We use your Personal Data to provide you with our Services pursuant to the terms of our User Agreement. For example, in order to facilitate fiat transfers into and out of your account, we need to know your financial information.

B. Comply with legal and regulatory requirements. We process your Personal Data as required by applicable laws and regulations. For example, we have identity verification requirements to fulfill our obligations under the anti-money laundering laws of numerous jurisdictions.

C. Detect and prevent fraud. We process your Personal Data to detect and prevent fraud on your account, which is especially important given the irreversible nature of cryptocurrency transactions.

D. Protect the security and integrity of our services. We use your Personal Data to further our security-first mentality. Maintaining the security of your account and the Exchange requires us to process your Personal Data, including information about your device and your activity on the Exchange, and other relevant information.

E. Provide you with customer support. We process your Personal Data anytime that you reach out to our Customer Support team with issues arising from your account.

F. Optimize and enhance our services. We use your Personal Data to understand how our products and Services are being used to help us improve our Services and develop new products.

G. Market our products to you. We may contact you with information about our Products and Services. We will only do so with your permission, which can be revoked at any time.

H. Other business purposes. We may use your information for additional purposes if that purpose is disclosed to you before we collect the information or if we obtain your consent.

### **3. How We Share Your Personal Data**

We will not share your Personal Data with third parties, except as described below:

A. Service Providers. We may share your Personal Data with third-party service providers for business or commercial purposes. Your Personal Data may be shared so that they can provide us with services, including identity verification, fraud detection and prevention, security threat detection, payment processing, customer support, data analytics, Information Technology, advertising, marketing, data processing, network infrastructure, storage, transaction monitoring, and tax reporting. We share your Personal Data with these service providers only so that they can provide us with services, and we prohibit our service providers from using or disclosing your Personal Data for any other purpose. Our third-party service providers are subject to strict confidentiality obligations. These include our service providers Compliance Assist, Elliptic, Veriff who support us with our financial regulation compliance.

B. Affiliates. We may share your Personal Data with our affiliates, for the purposes outlined above, and as it is necessary to provide you with our Services.

C. Law Enforcement. We may be compelled to share your Personal Data with law enforcement, government officials, and regulators.

D. Corporate Transactions. We may disclose Personal Data in the event of a proposed or consummated merger, acquisition, reorganization, asset sale, or similar corporate transaction, or in the event of a bankruptcy or dissolution.

E. Professional Advisors. We may share your Personal Data with our professional advisors, including legal, accounting, or other consulting services for purposes of audits or to comply with our legal obligations.

F. Consent. We may share or disclose your information with your consent.

If we decide to modify the purpose for which your Personal Data is collected and used, we will amend this Privacy Policy.

#### **4. Cookies**

When you access CL, we may make use of the standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit CL. We use Cookies to help us recognize you as a customer, collect information about your use of CL to better customize our services and content for you, and collect information about your computer or other access devices to: (i) ensure compliance with our Bank Secrecy Act ("BSA") and anti-money laundering ("AML") program ("BSA/AML Program") (ii) ensure that your account security has not been compromised by detecting irregular, suspicious, or potentially fraudulent account activities; (iii) assess and improve our services and advertising campaigns.

You also can learn more about cookies by visiting <https://www.allaboutcookies.org>, which includes additional useful information on cookies and how to block cookies on different types of browsers and

mobile devices. Please note that if you reject cookies, you will not be able to use some or all of CL. If you do not consent to the placing of Cookies on your device, please do not visit, access, or use CL.

## **5. Direct Marketing**

Subject to applicable laws and regulations, we may from time to time send direct marketing materials promoting services, products, facilities, or activities to you using information collected from or about you. You may opt-out of such communications at any time by contacting us at [support@CL.com](mailto:support@CL.com). You may also opt-out of such communications by following the directions provided in any marketing communication. It is our policy to not provide your Personal Data for those third parties' direct marketing purposes without your consent.

## **6. Information Security**

No security is foolproof, and the Internet is an insecure medium. We cannot guarantee absolute security, but we work hard to protect CL and you from unauthorized access to or unauthorized alteration, disclosure, or destruction of Personal Data we collect and store. Measures we take include encryption of the CL website communications with SSL; required two-factor authentication for all sessions; periodic review of our Personal Data collection, storage, and processing practices; and restricted access to your Personal Data on a need-to-know basis for our employees, contractors and agents who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

## **7. Information For California Residents**

We are required under the California Consumer Privacy Act of 2018 ("CCPA") to provide certain information to California residents about how we collect, use and share their Personal Data, and about the rights and choices, California residents may have concerning their Personal Data. For purposes of this section, "Personal Information" has the meaning provided in the CCPA.

Personal Data that we collect, use, and share

For ease of reference, we have compiled the chart below to demonstrate how we use the categories of Personal Data we have collected, used, and disclosed in the past 12 months. We do not "sell" any Personal Data, as "selling" is defined under the CCPA.



CATEGORY OF Personal Data	SOURCE(S) OF Personal Data	WHY WE COLLECT YOUR Personal Data	HOW WE SHARE YOUR Personal Data
Identifiers such as Personal Identification Information	Sections 1.A, 1.B, 1.C	Sections 2.A, 2.B, 2.C, 2.D, 2.E, 2.F, 2.G, 2.H	Sections 3.A, 3.B, 3.C, 3.D, 3.E, 3.F
Commercial information such as records of products or services purchased, obtained, or considered	Sections 1.A, 1.C	Sections 2.A, 2.B, 2.C, 2.E, 2.F	Sections 3.A, 3.B, 3.C, 3.D, 3.E, 3.F

Internet or other electronic network activity information, including browsing history and search history	Section 1.B	Sections 2.A, 2.B, 2.C, 2.F	Sections 3.A, 3.B, 3.C, 3.D, 3.E, 3.F
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### *California privacy rights*

California consumers have the following rights under the CCPA with respect to their Personal Data. Please understand, however, that these rights are not absolute, and we may decline requests as permitted under applicable law.

- Right to Request Access. You may submit a request that CL disclose the categories and specific pieces of Personal Data that we have collected, used, or disclosed about you in the past 12 months.
- Right to Request Deletion. You may submit a request that CL delete the Personal Data that we have about you.
- Right to Opt out of Sale of Personal Data. You have the right to opt out of the sale of your Personal Data. CL does not sell your Personal Data.
- Right Not to Receive Discriminatory Treatment. You have the right to exercise the privacy rights conferred by the CCPA without discriminatory treatment.

You may submit a request to access, edit or delete your Personal Data by emailing us a. We are legally obligated to verify your identity when you submit a request. We may request additional information from you to verify your identity.

You may designate an authorized agent to make a request under the CCPA on your behalf. Your authorized agent must submit proof that you have provided them with power of attorney pursuant to Probate Code sections 4000 to 4465. We may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf.

Please understand that we are not obligated to provide you with a copy of your Personal Data more than twice in a 12-month period.

## **8. Information For Persons Subject To EU Data Protection Law**

For customers who are located in the European Economic Area (“EEA”), United Kingdom, Channel Islands, or other locations subject to EU data protection law (collectively, “European Residents”), we adhere to relevant EU data protection laws. For purposes of this section, “personal data” has the meaning provided in the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

### *Lawful bases for processing*

We process personal data subject to GDPR on one or more of the following legal bases:

- Legal Obligation: to conduct anti-fraud and identity verification and authentication checks and to fulfill our retention obligations (Article 6 (1) (c));
- Contractual Obligation: to satisfy our obligations to you under our User Agreement, including opening an account to provide you with our services and customer support services, and to optimize and enhance CL (Article 6 (1) (b));
- Legitimate Interest: to monitor the usage of CL, conduct automated and manual security checks of our service, to protect our rights (Article 6 (1) (f)); and
- Consent: to market CL and our services to you, which includes the use of audio recordings. You may withdraw your consent at any time without affecting the lawfulness of processing based on consent before consent is withdrawn (Article 6 (1) (a)).

### *European privacy rights*

European Residents have the following rights under GDPR, subject to certain exceptions provided under the law, with respect to their personal data:

- Rights to Access and Rectification. You may submit a request that CL discloses the personal data that we process about you and correct any inaccurate personal data (Article 15 and 16).

- Right to Erasure. You may submit a request that CL deletes the personal data that we have about you (Article 17).
- Right to Restriction of Processing. You have the right to restrict or object to our processing of your personal data under certain circumstances (Article 18).
- Right to Data Portability. You have the right to receive the personal data you have provided to us in an electronic format and to transmit that Personal Data to another data controller (Article 20).

When handling requests to exercise European privacy rights, we check the identity of the requesting party to ensure that he or she is the person legally entitled to make such a request. While we maintain a policy to respond to these requests free of charge, should your request be repetitive or unduly onerous, we reserve the right to charge you a reasonable fee for compliance with your request.

#### *Collection and transfer of data outside the EEA*

CL operates internationally with many of our systems based in the United States. When we transfer your personal data to our affiliates outside the EEA, we make use of standard contractual clauses which have been approved by the European Commission. We may transfer personal data from Europe to third countries outside of Europe, including the United States, under the following conditions:

- Contractual Obligation. Where transfers are necessary to satisfy our obligation to you under our User Agreement, including to provide you with our services and customer support services, and to optimize and enhance CL (Article 6 (1) (b)); and
- Consent: where you have consented to the transfer of your personal data to a third country (Article 6 (1) (a)).

Where transfers to a third country are based on your consent, you may withdraw your consent at any time. Please understand, however, that our services may not be available if we are unable to transfer personal data to third countries.

When we transfer personal data to third countries, we endeavor to ensure adequate safeguards are implemented, for example through the use of standard contractual clauses or Privacy Shield certification.

#### *Automated decision-making*

We may engage in automated decision-making for purposes of fraud detection and prevention.

### **9. Contact Us**

If you have questions or concerns regarding this policy or our processing of your Personal Data to CL specific products, please feel free to email us at: [safemoon@cl-cards.com](mailto:safemoon@cl-cards.com);

If you have questions or concerns regarding this policy or our processing of your Personal Data relating to CL-Card related products, please feel free to email us at: [safemoon@cl-cards.com](mailto:safemoon@cl-cards.com)

or write to us at:

Frozen Time UNIPessoal LDA, Urbanização Algarvesol, Lote 1, Fonte Santa, Quarteira, freguesia de Quarteira, Concelho de Loulé.

If you are a European resident and you believe that we have not adequately resolved any such issues, you have the right to contact your local supervisory authority.