

PRIVACY AND PERSONAL DATA PROTECTION POLICY (“PRIVACY POLICY”)

- (1) Maxonrow Ltd. (Company No. 1989278), a BVI Business Company incorporated in the British Virgin Islands having correspondence address at Vistra Corporate Services Centre, Wickhams Cay II, Road Town, Tortola, VG 1110, British Virgin Islands (“**Maxonrow**”) collects your personal information when you register with us to use our platform (“**Platform**”), use Maxonrow websites, mobile applications or other services which we provide or otherwise contact us online (collectively, “**Services**”).

By using these Services, you agree to the terms of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services. We reserve the right to make changes in this Privacy Policy, so please check back from time to time to ensure you are aware of any changes. Your continued use of the Services following any changes to the Privacy Policy will signify your acceptance of these changes to the Privacy Policy.

- (2) This Privacy Policy describes our collection, use, disclosure and/or processing of personal information which has been provided by you or collected through our websites and mobile applications. We will collect your personal information in accordance with the local laws and regulations that apply to us.
- (3) This Privacy Policy applies only to the Services on which this Privacy Policy is made available by Maxonrow and not to websites, networks or platforms maintained by other third-party companies or organizations to which we may provide links. Please note, however, that when you access any third-party websites, networks or platforms through links provided within our Services, Maxonrow is not responsible or liable for the contents or activities of those third-party websites, networks or platforms and their privacy policies, and Maxonrow does not guarantee the security of any personal information disclosed on or collected by those third-party services. Please check the privacy policies of such third-party websites, networks or platforms before you submit any personal data to such third party. If you access and provide your personal information to those third-party websites, networks or platforms, you do so at your own risk.

(4) WHEN DOES COLLECTION TAKE PLACE

- (A) Maxonrow collects your personal information at different times when you make use of our Services. Generally, personal information is collected when:
- you use our Services;
 - you create an Account;
 - you watch advertisements within our Services;
 - you sign up to our newsletter;
 - you contact Maxonrow’s customer service and during technical support sessions;
 - you enter into Maxonrow’s contest(s) or promotion(s);
 - you chat with other users of the Services via the Platform or on Maxonrow’s websites or mobile applications;
 - you participate in a beta or otherwise use a trial version of the Platform; or
 - you share content on or otherwise contribute to our social media channels and other community websites.
- (B) We will only collect, use, disclose and/or process personal information to the extent deemed reasonably necessary to fulfil your requests, or for any purposes that we have given you prior notification of.
- (C) If you do not submit personal information when asked by Maxonrow, your refusal may limit our ability to provide you with our Services, including but not limited to processing your creation of a Maxonrow account (“**Account**”), registration for our contests or promotions, or requests for customer service and technical support.
- (D) You have the right to withdraw your consent at any time. However, please be advised that withdrawing your consent may result in the closing of your Account at Maxonrow and/or us ceasing to provide you with the Services.

(5) TYPES OF PERSONAL INFORMATION COLLECTED

(A) We collect the following categories of personal information:

- Registration information you provide when you create an Account, including your first name and surname, country of residence, gender, date of birth, email address, username and password;
- Transaction information you provide when you request for information or use our Services, whether through our websites or mobile applications, including your postal address, telephone number, payment information and cryptocurrency wallet address;
- Information you provide in public forums on our Platform, websites and applications;
- Information sent either one-to-one or within a limited group using our message, chat, post or similar functionality, where we are permitted by law to collect, use, disclose and/or process this information;
- Location information when you visit our websites or use our applications, including location information either provided by a mobile device interacting with one of our websites or applications (including through beacon technologies), or associated with your IP address, where we are permitted by law to collect, use, disclose and/or process this information; and
- Usage, viewing and technical data, including your device identifier or IP address, when you visit our websites, use our applications on third-party websites or platforms or open emails we send.

(6) HOW YOUR PERSONAL INFORMATION IS COLLECTED

We collect personal information when you use our Services, request for information from us, register an account with us, participate in public forums or other activities on our websites and applications, respond to our customer surveys, or otherwise interact with us using one or more devices. Please keep in mind that when you provide personal information to us through a third-party website or platform, the personal information may be collected by the third-party website or platform, in which case it will be subject to the third-party website or platform's privacy practices and policies. Privacy choices that you have made on the third-party website or platform will not apply to our use of the personal information we have collected directly through our applications.

We collect information through technology such as cookies, Flash cookies and Web beacons, when you visit our websites and applications or use our applications on third-party websites or platforms using one or more devices. Please see our Cookie Policy under Appendix 1 for more information.

We acquire information from other sources to update or supplement the information you provided or we collected automatically. Please note that we may be required under local law to first take steps to ensure that you have authorized the relevant third party to share your personal information with us.

(7) PURPOSE FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF YOUR PERSONAL INFORMATION BY MAXONROW

The personal information which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including for the following purposes:

- Facilitate the use of any Services;
- Communicate with you about your Account or transactions with us and send you information about features on our websites and applications or changes to our policies;
- Send you offers and promotions for our Services or third-party products and services, where you have consented to be provided with such offers and promotions;
- Personalise your content and experiences on our Services, websites and mobile applications;

- Provide you with targeted advertisements based on your activity on our websites, applications and third-party websites and applications, where you have consented to be provided with such advertisements;
- Process your registration and/or participation for competitions, contests, promotions, seminars, and other events organised or co-organised by Maxonrow;
- Optimise or improve our Services and operations, including by conducting research, analysis and other development activities such as data analytics, surveys and/or profiling; and
- Detect, investigate and prevent activities that may violate our policies or any other illegal activities, including the prevention of fraud, anti-money-laundering, anti-terrorism-financing, and other customer due diligence procedures.

(8) DISCLOSURE OF YOUR PERSONAL INFORMATION TO OTHER PARTIES

Subject to the provisions of any applicable law, we may/will disclose your personal information to other parties for the above purposes and the following:

- where you elect to share your personal information with third-party companies, so that they can send you offers and promotions about their products and services;
- where you direct us to share your personal information with third-party websites or platforms, such as social networking websites;
- when companies perform services on our behalf, such as customer service, in which case we will take reasonable steps to ensure that these companies do not process your personal information for purposes other than those requested by us or required by law; and
- when we share personal information with third parties in connection with the sale of a business, to enforce our terms and conditions or policies, ensure the safety and security of our guests and third parties, protect our rights and property and the rights and property of our guests and third parties, comply with legal process or in other cases if we believe in good faith that disclosure is required by law, including, for the avoidance of doubt, when we are required by law to disclose to the relevant government or authorities.

Please note that once we share your personal information with another company, the information received by the other company may be subject to the other company's privacy practices.

(9) YOUR CONTROLS AND CHOICES

You can exercise certain controls and choices regarding our collection, use and sharing of your personal information. In accordance with applicable local law, this may include the right to correct, update and delete your Account.

You may exercise your controls and choices, or request access to your personal information, including if for any reason you wish to question, view, correct or delete (if and only if possible) the personal information collected about you by Maxonrow, by filling out the relevant forms in the English language and sending it to the Maxonrow Support Centre, and following any instructions provided in the follow-up communications sent to you. The relevant forms can be provided by us to you upon your request for such forms.

We will process your request within a reasonable time, and will inform you if more time is required. We will be happy to review, update, correct or remove information where applicable and as appropriate.

This Privacy Policy has, as much as we could, incorporated elements from the General Data Protection Regulation as we act in accordance to its personal information processing rules within European Economic Area. If you are located in or are a citizen of the European Union, you may have the following rights (subject to some exceptions) under the General Data Protection Regulation in relation to personal information that we hold about you:

- To request confirmation of whether we process personal information relating to you, and if so, to request a copy of that personal information;

- To request that we rectify or update your personal information that is inaccurate, incomplete or outdated;
- To request that we erase your personal information in certain circumstances, such as where we collected personal information on the basis of your consent, and you withdraw your consent;
- To request that we restrict the use of your personal information in certain circumstances;
- Where you have given us consent to process your personal information, to withdraw your consent; and
- To request that we provide a copy of your personal information to you in a structured, commonly used and machine-readable format in certain circumstances.

(10) DATA SECURITY, INTEGRITY AND RETENTION

The security, integrity and confidentiality of your personal information are extremely important to us. We have implemented reasonable technical, administrative and physical security measures that are designed to protect your personal information from unauthorized access, disclosure, use and modification. From time to time, we review our security procedures to consider appropriate new technology and methods. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable.

We will cease to retain your personal information as soon as it is reasonable to assume that (i) the purpose(s) for which that personal information was collected is no longer being served by the retention of such personal information; and (ii) the retention is no longer necessary for legal or business purposes.

(11) DATA TRANSFERS, STORAGE AND PROCESSING GLOBALLY

We operate globally and may transfer your personal information to related corporate bodies or third parties in locations around the world for the purposes described in this Privacy Policy. Regardless of where your personal information is transferred, stored or processed, we will take reasonable steps to protect and safeguard the privacy of your personal information and comply with the applicable local data protection laws in doing so. In this regard, this includes us obtaining your consent unless an exception under the law applies, and taking appropriate steps to ascertain that overseas recipients are bound by legally enforceable obligations to ensure that these recipients provide a standard of protection to your personal information that is comparable to the standard of protection under the applicable local laws. This may include us entering into an appropriate contract with the overseas recipient dealing with the personal information transfer or permitting the personal information transfer without such a contract if the applicable law permits us to.

(12) CONTACT US

If you have any questions, complaints or comments about this Privacy Policy or our use of your personal information, please do not hesitate to contact our Data Protection Officer at: support@maxonrow.com or write to:

Address:

Maxonrow Ltd. (Company No. 1989278)
 Vistra Corporate Services Centre,
 Wickhams Cay II, Road Town, Tortola,
 VG 1110, British Virgin Islands

(13) CHANGES TO THIS PRIVACY POLICY

From time to time, we may change this Privacy Policy to accommodate new technologies, industry practices, regulatory requirements or for other purposes. Your continued use of the Services following any changes to this Privacy Policy will signify your acceptance of these changes to this Privacy Policy.

(14) PRIVACY POLICY AND TERMS AND CONDITIONS

The terms of this Privacy Policy shall be read together with our Terms of Use.

APPENDIX 1

COOKIE POLICY

Maxonrow may collect your personal information provided to or collected by Maxonrow via cookies and other tracking technologies. By using our Services, you agree and consent to our use of cookies in accordance with this Cookie Policy and our Privacy Policy.

Cookies are used to help speed up your future activities and your experience on Maxonrow. We use cookies to make Maxonrow websites easier to use, to recognise when you log in and any preferred settings, to deliver a personalised experience on our websites, to better tailor our services and websites to your interests and needs, and to analyse how you use our website which helps us troubleshoot any problems and to monitor our own performance.

To opt out of these cookies you will need to change the settings on your browser Cookie preferences. If you choose to block these cookies, your use of the Services may not work as it should and any preferences you have may be lost. Please take note that Maxonrow is not responsible for any loss resulting from your decision or inability to use cookies.

We may update this Cookie Policy from time to time. You agree and consent to any changes in this Cookie Policy by way of your continued use of our Services following the updates to the Cookie Policy, as defined in the Privacy Policy.