privacy policy

[Introduction and Terms] ekbit (hereinafter referred to as the "Company") is a Singapore-based digital asset investment platform specializing in cross-era innovation. The Company operates the ekbit App (hereinafter referred to as "the Platform" or "the Service"), which provides dedicated services for digital asset trading and related operations. For the sake of clarity, both the Company and the Platform are collectively referred to as "we" or other first-person terms in this Agreement. Any individual or entity accessing the Platform shall be deemed a user of the Platform. Subsequent references to "you" or other second-person terms shall combine "you" with "we", while either "we" or "you" may be used individually as "one party".

We fully understand and respect the importance of your personal information to you. We will take appropriate security measures in accordance with legal and regulatory requirements to protect the security of your personal information. In view of this, we hereby formulate this Privacy Policy (hereinafter referred to as "this Policy/This Privacy Policy") and remind you:

This policy applies to all products and services we provide. If a product or service we provide has a separate privacy policy, that product or service shall be governed by its separate privacy policy. If no separate privacy policy exists for our products or services, this policy shall apply.

It should be noted that this Policy does not apply to services provided by other third parties to you, and the privacy policy separately stated by the third party to you applies to the services provided by the third party.

Before using any of our products or services, please carefully read and fully understand this policy, with particular attention to clauses highlighted in bold or underlined text. You must thoroughly review these sections and confirm full understanding and consent before proceeding. Should you have any questions, feedback, or suggestions regarding this policy, please contact us through the official channels provided. If you disagree with any terms in this policy, you should immediately stop accessing the platform.

## Part I. Definitions

Personal information refers to all kinds of information recorded electronically or otherwise that can identify the identity of a specific natural person alone or in combination with other information or reflect the activities of a specific natural person.

Sensitive personal information: refers to personal information including id card number, personal biometric information, bank account number, property information, whereabouts, transaction information, children under the age of 14 (inclusive) and other personal information (we will highlight specific sensitive personal information in bold in this Privacy Policy).

Personal information deletion: refers to the act of removing personal information in the system involved in the implementation of daily business functions, so that it remains unsearchable and inaccessible.

Child: means a minor under the age of fourteen.

Part II Privacy Policy

This Privacy Policy section will help you understand the following:

I. HOW WE COLLECT AND USE YOUR INFORMATION

II. HOW WE USE ekbit AND LIKE TECHNOLOGIES

III. HOW WE SHARE, TRANSFER AND publicly disclose your Information

## IV. HOW WE PROTECT YOUR INFORMATION

- V. How do you manage your information
- VI. How do we handle information about minors
- VII. How this Privacy Policy is updated

VIII. HOW TO CONTACT US

#### I. HOW WE COLLECT AND USE YOUR INFORMATION

When you use our products and/or services, we need/ may need to collect and use your personal information in the following two ways:

- 1. In order to provide you with the basic functions of our products and/or services, you must authorize us to collect and use necessary information. If you refuse to provide the corresponding information, you will not be able to normally use our products and/or services;
- 2. To enable additional features of our products and/or services, you may choose to authorize us to collect and use specific information. If you decline to provide this information, you may not be able to fully utilize the additional features or achieve the intended functionality. However, this will not affect your access to the core functionalities of our products and/or services.

You understand and agree that:

- 1 We are committed to developing diverse products and services tailored to your needs. As our offerings vary in type and scope, the specific features available may differ across users. Accordingly, the basic/advanced functionalities and categories of personal information collected will also vary. Please refer to the specific product/service features for details.
- 2. To deliver enhanced product and service experiences, we continuously refine our technology. As a result, we may periodically introduce new or enhanced features that require collecting, using, modifying personal information, or changing how it is used. We will notify you through updates to this policy, pop-up notices, or page prompts regarding these changes.

The purpose, scope, and usage of data collection are clearly defined. You may choose to consent through self-selection methods, and we will collect and use your information only after obtaining your explicit consent. Should you have any questions, feedback, or suggestions during this process, please contact us via the various channels provided on our platform. We will respond promptly to address your concerns.

We will collect and use your personal information to enable us to perform the following functions under this Policy:

(1) Help you register and provide you with the services provided by the Platform;

## 1 Registration services

We provide basic membership services through this platform account. To register as a member and use our membership services, you need to fill in and provide the following information when applying for registration:

(1) Identity Information. This information helps us verify your eligibility to register as a member of this platform, including but not limited to your name, residential address, other certificates issued by your country or government that serve as proof of identity, relevant numbers, and all other information that assists in verifying your identity (collectively referred to as "identity information"). The specific identity information varies depending on whether you are an individual user or an institutional user. Depending on the laws and regulations of different jurisdictions, the information we collect from users in various countries or regions may differ. The following information and data serve as illustrative examples:

Individual User: Nationality, legal full name (including former names and local language names), ID number, email address, telephone number, Social Security Number ("SSN"), passport number or any government-issued identification number, date of birth, identification documents (e.g. passport, driver's license or government-issued identification).

Institutional User: The company's legal name (including the local language version), registration details, business contact number, authorized representative and user information, primary business address, personal data of all beneficial owners, identification documents of shareholders/beneficial owners (passport or government-issued ID), corporate structure, establishment-related documentation, board resolutions, capital source declaration, risk and compliance control statements, and any other information or files required by the platform.

(2) Service Information. This information helps us contact you and provide various transaction services between digital assets, including but not limited to your personal identification information, contact details, transaction records, debit card details, and/or other account information (collectively referred to as "Service Information"). Please note that the services we offer are continuously updated and improved. If you choose to use additional services not covered in the above description, where we need to collect extra information from you for such services, we will inform you through page prompts, interactive processes, contractual agreements, pop-up notifications, etc., about the scope and purpose of data collection, and obtain your consent.

If you only need to use the browsing service, you do not need to register as a member of us and provide the above information.

## 2. Other registration services

Real-name authentication: When you register and log in, you need to enter the "Personal Center" to complete the real-name authentication. During the process of real-name authentication, you need to provide your real name, ID card number or passport number to the platform.

Advanced Verification: When your transaction volume on this platform exceeds a specified threshold, the platform will require advanced verification to safeguard your asset security. In addition to real-name authentication, you consent to the platform's advanced facial recognition verification process. This verification involves collecting relevant video streams or facial images for identity confirmation.

Account Information Display: If you have an account on this platform, we may display your personal information (real-name verification only shows approval status) and your activities in products/ services associated with your account. This includes centralized display of your profile details and transaction records. We will respect the preferences you've set regarding account settings.

#### (2) Safety management services and service information push services

When you use or access the services provided by this platform, we automatically collect and record your browser information to ensure transaction security and maintain stable service operations. This includes device identifiers such as the type, model, and version of your login device; IP addresses and records from web pages you visit; geographical location; network environment; device fingerprint data; service log information; software details; and location data.

Please note that standalone device information cannot be used to identify specific individuals. When such non-personal data is combined with other information for identifying specific individuals or integrated with personal data, it will be treated as personal information during this period. Unless authorized by you or otherwise specified by laws and regulations, we will anonymize or de-identify this information.

To provide you with more convenient and personalized information display and push services, we may extract your preference profiles based on device information and browsing data from your platform or client. These profiles will generate indirect audience profiles for displaying, pushing information, and potential commercial advertisements. If you do not wish to receive such notifications or wish to withdraw consent for personal information collection, please contact us through the contact details provided in this policy.

We strive to ensure your browsing experience. If you do not wish to receive our commercial advertisements, you can unsubscribe or disable them through SMS prompts or other methods provided by us.

In addition, we will use your information to continuously improve and optimize the above features.

# (3) Keeping and inquiry service of transaction records

We collect relevant data from your transactions on this platform, including but not limited to trading records. To check your order details, you can access your personal transaction records through the "Order Management" section of the platform. The details include: counterparty nickname, order placement time, order ID, transaction information, digital asset type, and quantity.

## (iv) Customer service and dispute resolution

When you contact us or apply for sale and after-sales service or dispute settlement, in order to ensure the security of your account and system, we need you to provide necessary personal information to verify your membership status.

To facilitate communication with you, promptly resolve your issues, or document solutions and outcomes, we may retain your correspondence records and related information (including account details, order data, additional materials you provide to substantiate claims, or contact information). When you inquire about specific orders, file complaints, or offer suggestions, we will utilize your account information and order records.

In order to provide and improve the reasonable need for service, we may also use other information about you, including the relevant information you provide when contacting customer service, and the questionnaire responses you send to us when participating in the questionnaire.

# (5) Other

- 1 . If your submitted information contains personal data of other users, you must obtain proper authorization prior to sharing such information with this platform. When dealing with children's personal information, you must obtain consent from their legal guardians before publication. In these cases, guardians may contact us through the channels specified in Article 9 of this policy to request corrections or removal of content involving children's personal information.
- 2. We will obtain your prior consent if we use the information for other purposes not specified in this Policy, or if the information collected for a specific purpose is used for other purposes, or if we actively obtain your personal information from a third party.

When collecting information indirectly from third parties, we explicitly require them to obtain your written consent prior to data collection. We will notify you of the shared information content, with sensitive data requiring explicit confirmation before usage. Third parties must commit to the legality and compliance of their data sources. Should any violations occur, we will hold them legally accountable. We implement robust security measures for indirect data acquisition, including sensitive data reporting, encrypted storage, and access control. We protect indirectly obtained personal information using safeguards equivalent to those we apply to our own user data.

# 3 Exceptions to authorization

You fully understand and agree that we may collect and use your personal information without your authorization and consent under the following circumstances, and we may not respond to your requests for correction/modification, deletion, cancellation, withdrawal of consent or retrieval of information:

- (1) Those related to national security and defense security;
- (2) Those related to public safety, public health or major public interests;
- (3) Related to judicial or administrative law enforcement such as criminal investigation, prosecution, trial and execution of judgment;
- (4) Where it is difficult to obtain the consent of the person concerned, in order to safeguard the life, property and other major legitimate rights and interests of the person concerned or others;