

YIELD App

Privacy Policy

Last Revised Date: 15 July 2021

1. Introduction

This Privacy Policy describes how YieldApp OÜ¹, YALP LTD², YIELD App Limited³, TGT, LP⁴ and YIELD D.F.A.S.⁵, including but not limited to, their legal persons, unincorporated organizations and teams that provide YIELD Services (collectively, the “YIELD Operators”, “we”, “our”, and “us”), collect, use, process, disclose, share, transfer, and protect the information you provide on the YIELD website (“YIELD.APP”) as well as our mobile application (collectively as “YIELD Platform”). This Privacy Policy constitutes a part of the Terms and Conditions of YIELD Platform (“T&Cs”). The terms used in this Privacy Policy shall share the same definition as those stipulated in the T&Cs unless otherwise indicated herein.

We respect and value your privacy as well as the integrity of the information you have provided and/or permitted us to collect. Thus, we endeavor to follow industry standards to ensure the security and confidentiality of your Personal Information (as defined below) when you access YIELD Platform or use YIELD Services.

When accessing, registering, downloading, using, clicking or engaging in any of the YIELD Services provided on YIELD Platform, you are strongly advised to carefully read, acknowledge, understand and accept all terms stipulated in this Privacy Policy. Unless upon providing you with a prior notification and obtaining your consent, we will not use your Personal Information, in any form, for any other purposes other than those indicated in this Privacy Policy or the T&Cs.

This Privacy Policy has incorporated several provisions from the General Data Protection Regulation (“GDPR”), in particular with regard to the rules governing the processing of personal information within the European Economic Area (EEA).

This Privacy Policy shall inform you about the following matters among several others:

¹ YieldApp OÜ is an Estonian Limited Liability Corporation incorporated under the laws of the Republic of Estonia.

² YALP LTD is an entity registered under the laws of Cyprus.

³ YIELD App Limited is an International Business Company incorporated under the laws of the Republic of Seychelles.

⁴ TGT, LP is an Exempted Limited Liability Partnership registered under the laws of Cayman Island.

⁵ YIELD D.F.A.S. is an Exempted Company registered as an Investment Manager under the laws of Cayman Island.

- Acceptance of the Privacy Policy;
- Personal Information (as defined below) collected by us;
- How we collect personal information;
- How we use personal information;
- How we store personal information;
- How long we retain personal information;
- Cookies;
- Sharing your personal information;
- Third-Party collection of personal information;
- Your legal rights;
- Rights of the residents in EEA;
- Limitations;
- Updates or amendments to the Privacy Policy; and
- How to contact YIELD Operators.

2. **Acceptance of the Privacy Policy**

By accessing, using or engaging in YIELD Services, you indicate and confirm that you have agreed to the terms of this Privacy Policy. Unless upon providing you with a prior notification and obtaining your consent, we will not use your personal information for any other purposes other than those indicated in this Privacy Policy or the T&Cs.

If you do not agree, either partially or wholly, to this Privacy Policy, you must immediately discontinue accessing, using or engaging in YIELD Services and YIELD Platform.

3. **Personal Information that we collect**

For the purposes of this Privacy Policy, your Personal Information (as defined herein) is information that can be used to identify, describe, relate, or associate with a particular individual. The following are the types of information we collect and store when you use YIELD Services (collectively, the “Personal Information”):

3.1. Information provided by you when registering to YIELD Platform

When you first sign up to use YIELD Services by opening a virtual account with YIELD Platform (“YIELD Account”), you may be required to provide us your real name, date of birth, nationality, home address, email address,

signature and other information which can be used to distinguish your identity.

Generally, we will not collect nor process "Sensitive Information", such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data that uniquely identify specific persons, or any information concerning health or sexual orientation. Thus, if you are using biometric authentication methods to sign into your YIELD Account, you shall be required to provide us with your fingerprint data, facial recognition data and, more importantly, your explicit consent to process your biometric data.

3.2. Information collected by us for compliance purposes

In order to comply with domestic and international industry standards, government rules and regulations, in particular the Anti-Money Laundering (AML) regulations, Know Your Customer (KYC) rules and Counter-Terrorist Financing (CTF) regulations, YIELD Operators are required to collect your Personal Information from identification documents, such as your passport, national identification card, driver's license, tax identification and visa. Other documents which we may use are, including but not limited to, your proof of address, source of fund declaration, purpose and source of wealth, etc.

3.3. Information collected by us during your usage of YIELD Services

3.3.1. Usage of Information

When you engage or use YIELD Services, we will monitor and track your Personal Information in relation to your usage of YIELD Services such as your IP address, phone number, the type of device you use to access YIELD Platform, device information, operating system and hardware settings, browser type, and network operator. This information shall either be directly obtained by YIELD Operators or through third-party service providers.

We collect this type of information to ensure that our interface and/or YIELD Platform is seamlessly accessible for all users around the world.

3.3.2. Communication of Personal Information

You hereby agree that we are entitled to collect and use the Personal Information you have provided on YIELD Platform or generated through your usage of YIELD Services for the purpose of being able to communicate with you through messages, requests, emails, telephone conversions, voicemails, live chats, file attachments in connection with your transactions on YIELD, or any other information related to your contact with YIELD Operators.

3.3.3. Financial Information

You hereby agree that, for the purposes stipulated in this Privacy Policy, we are entitled to collect and use the information contained in or related to your financial information as provided by you during the usage of YIELD Services. This includes, without limitation, your transaction history, such as your initial

deposit amount, withdrawal requests, digital wallet address(es), investment details, bank name, bank account information, payment card number.

We collect this financial information to monitor any suspicious financial activities in order to protect users from fraud, resolution of legal cases, as well as any other purposes as disclosed in this Privacy Policy.

4. **How we collect Personal Information**

4.1. Personal Information automatically collected by us

We will collect and process Personal Information automatically provided by you under the following situations:

- 4.1.1. when you register YIELD Account, log in, or visit YIELD Platform;
- 4.1.2. when you voluntarily complete any user survey or provide feedback to us via emails or any other electronic channels;
- 4.1.3. when you use browser cookies or any other relevant software upon visiting YIELD Platform; and
- 4.1.4. other situations where we may automatically collect your information as described in this Privacy Policy or our T&Cs.

4.2. Information collected by the third-party

We shall collect your Personal Information from third parties as required or permitted to the extent of the applicable laws. Information from the third-party sources shall include, but not limited to, public databases, credit bureaus, ID verification partners, blockchain data, marketing partners and resellers, advertising partners, and analytics providers.

4.3. Anonymized and Aggregated Data

We will also collect other Personal Information in the form of anonymized and aggregated information, where all information shall be combined and then removed of any personally identifiable information, thus making it unusable for the identification of a specific individual. We use anonymized or aggregate users' information for the purposes stipulated in this Privacy Policy at any time, including gaining a better understanding of users' needs and behaviors, conducting business intelligence and marketing initiatives, and detecting security threats. In this regard, we reserve the right to implement innovative technologies as they become available to be used for strategic planning and operational processes.

5. **How we use Personal Information**

Your Personal Information shall be made available to YIELD Operators, our affiliates, and/or within our group of companies. This will include, but not be limited to, the employees and/or any persons or third parties working for YIELD Operators who are responsible for using and protecting your Personal Information.

We use and process your Personal Information for the following purposes or in the following manners:

5.1. To provide YIELD Services

We use your Personal Information, either collected or delivered, in order to maintain and provide efficient YIELD Services (including, but not limited to, processing transactions), to improve the efficiency of day-to-day YIELD Services, and to verify your identity. We use IP addresses and unique identifiers stored in your device's cookies to help us authenticate your identity and activities and provide YIELD Services.

5.2. To protect users

We use the information collected to protect YIELD Platform, users' YIELD Accounts and archives. We also use IP addresses and cookies to detect any suspicious activities and to protect against automated abuse, such as spam, phishing and Distributed Denial of Service (DDoS) attacks.

5.3. To comply with the relevant rules and regulations

For our legitimate interests, we shall use the Personal Information in compliance with our legal obligations, global and local industry standards, government requests and our AML/KYC/CTF procedures. In the case where it is strictly necessary (i.e. to protect the vital interests of the users or other natural persons, to fulfil the purpose of public interest, or to pursue our reasonable interests), we may use and process your Personal Information without obtaining your consent.

5.4. For measurement, research and development purposes

We actively measure and analyze your Personal Information to understand the way you use and interact with YIELD Services. This review is continuously conducted by our operational teams to continuously improve YIELD Platform's performance and to resolve issues with user experience.

In addition, we use such information to customize, measure and improve YIELD Services, our administration, the content and layout of YIELD Platform, and to develop new services for you.

5.5. For communication purposes

We use your Personal Information, collected or derived from your communication devices or your email address, to interact with you directly, to provide you with necessary support and/or to keep you informed of logins, transactions, YIELD Account security details, as well as other aspects. All direct communications shall be appropriately maintained with YIELD Operators, or the service providers designated by YIELD Operators, to be reviewed for accuracy, retained as evidence, or used to perform other statutory requirements or other obligations as stipulated in this Privacy Policy and the T&Cs.

5.6. To enforce T&Cs

Personal Information is also used to continuously and actively enforce our T&Cs among our users. Activities in this regard include, but are not limited to, reviewing, investigating and preventing any potentially prohibited or illegal activities that may violate preceding provisions, or disclose relevant information to third parties in accordance therewith. In light of this, we reserve the right to suspend or terminate any YIELD Services to any users who are found to be engaged in any activities that violate our T&Cs.

5.7. For marketing and advertising

We will share your Personal Information with our marketing partners for the purposes of targeting, modelling and/or identifying analytics as well as marketing and advertising.

5.8. For rebates

We shall share the Personal Information collected from you, including but not limited to, your identification information and transaction information, with your referrer for the purposes of rebates and other benefits.

5.9. For other purposes

Unless upon providing you with a prior notification and obtaining your consent, we will not use your Personal Information for any other purposes other than those indicated in this Privacy Policy.

6. **How we store your Personal Information**

We shall take great care in implementing and maintaining the security of YIELD Services as well as that of your Personal Information. We employ procedures and policies that incorporate industry best practices to ensure the integrity of your Personal Information and to prevent instances of unauthorized use.

YIELD Platform's security is fully integrated into Amazon Web Services, covering all aspects of security such as identity management, connection

security, application security and database security for user's interactions with YIELD Platform.

Please note that it is impossible to fully guarantee the security of your Personal Information. While we take reasonable steps to safeguard your Personal Information, we shall not hold any responsibility for the acts committed by those who gain unauthorized access or abuse your information and services. Thus, you are recommended to understand this responsibility and to independently take the necessary safety precautions to protect your Personal Information, in particular your credential information, such as your username and password. You hereby agree that we shall not be liable for any information leakage and/or other losses not caused by our gross negligence, including but not limited to, hacker attacks, power interruptions or unavoidable technical failures.

7. **How long we retain your Personal Information**

We shall be required by the applicable laws and regulatory requirements to retain certain information, including Personal Information of users, users' profiles, identification verification materials, information relevant to AML/KYC/CTF procedures, account information, account agreements, and other agreements between us and third-parties, account statements, and other records.

Such records shall generally be retained as required by law for the minimum amount of time necessary to accomplish the purpose for which it is collected; and thereafter no longer than is permitted under YIELD Operators' Information Retention Policy.

However, even after you've deactivated your YIELD Account, we may retain copies of information about you and any transactions or services which you may have participated in for a period of time in accordance with the applicable laws, statute of limitations or as we believe as reasonably necessary to comply with the applicable laws, regulations, legal procedures or governmental requests in order to detect or prevent fraud, outstanding fees, resolve disputes, address problems with YIELD Services, assist with investigations, enforce any of our T&Cs or other applicable agreements or policies, or to take any other actions consistent with the applicable laws.

8. **Cookies**

We shall use cookies and other technologies or methods of web and mobile analysis to gather, store and track certain information related with your access to and activities through YIELD Services, including when you visit YIELD Platform.

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are beneficial and may be used for various purposes. These purposes include, among others, by allowing you to

navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and YIELD Services quicker, easier and smoother. YIELD Platform shall use the following types of cookies:

8.1. **Strictly Necessary Cookies**

These cookies are essential to enable you to log in, navigate a website and use its features or to provide one of YIELD Services as requested by you. We shall not be required to obtain your consent in order to use these cookies.

8.2. **Functionality Cookies**

These cookies allow the YIELD Platform to remember the choices you made (such as in respect of your username, language or the region you reside in) and provide enhanced and more personal features. The information these cookies collect remains anonymous and they cannot track your browsing activity on other websites.

8.3. **Performance cookies**

These cookies collect information about how you use YIELD Platform, for example, which pages you visit most often, record of difficulties you may have experienced while using YIELD Platform, such as any error messages. All information collected by these cookies is aggregated and thus anonymous. It is only used to improve the efficiency of the YIELD Platform.

8.4. **Targeting Cookies or Advertising Cookies**

These cookies are used to deliver advertisements tailored in specific to you and your interests. They are also used to limit the number of times you see an advertisement as well as to help measure the effectiveness of the advertising campaign. These cookies remember that you have visited a website and this information is shared with other organizations, such as advertisers. Quite often targeting or advertising cookies shall be linked to the sites' functionality provided by the other organizations.

You may remove these cookies by following the instructions of your device preferences. However, if you choose to disable cookies, some features of YIELD Services may not operate properly, and your online experience may be limited.

9. **Sharing your Personal Information**

We shall not rent, sell, or disclose your Personal Information to any third parties, except to those who require access to the Personal Information to perform their tasks and duties and to share with third parties who have a legitimate purpose for accessing it.

We may share, transfer, disclose, or allow access to your Personal Information to the following third parties for the purposes described below:

- 9.1. We may disclose Personal Information to the third parties in order to administer or process a transaction, or YIELD Services you have authorized or requested, or in the context of facilitating the execution of a transaction.
- 9.2. We shall be required to validate your identities by applicable laws and regulatory requirements and rely on third-party services to perform these validations. Personal Information that you provide to us during the account opening process is passed to these services at account opening and on an ongoing basis thereafter.
- 9.3. We provide Personal Information that you provide during the account opening process, as required by the applicable laws and regulatory requirements, to carry out or aid in certain functions, including, but not limited to, account processing, surveillance, reconciliation, execution, document retention requirements, and document dissemination.
- 9.4. We share your Personal Information with financial institutions with which we partner to process payments which you have authorized.
- 9.5. We may share analysis based on anonymous user's information or behavior with our affiliate companies in order to operate and improve our products and services.
- 9.6. We may disclose or transfer information we collect to a purchaser of our business.
- 9.7. We may disclose or transfer information we collect upon account closing where you have a deficient balance, or upon excessive instances where you do not have sufficient funds in your account.
- 9.8. We may disclose your Personal Information for certain promotions and special offers when the nature of the promotion or special offer requires us to gather and share your Personal Information (such as your email address) with a third-party for delivery of goods or services. Should you choose to purchase a product or service offered by another company by way of a promotion or special offer, any Personal Information you share with that company would no longer be governed by this Privacy Policy.
- 9.9. We may disclose Personal Information to third parties that provide services, including, but not limited to, consulting, sales, client support operations, payment processing, authentication services, and technical support or services.

- 9.10. We may share your Personal Information with the law enforcement and government officials, or any other third parties where we are compelled to do so by a subpoena, court order, or similar legal procedure, or when we believe in good faith that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of our T&Cs or any other applicable policies.
- 9.11. Unless upon providing you with a prior notification and obtaining your consent, we may disclose to third parties your Personal Information, such as details of your YIELD Account or the transactions you made.
- 9.12. Other circumstances under which we may disclose your Personal Information are as follows:
 - 9.12.1. comply, as necessary, with the applicable laws and regulatory requirements;
 - 9.12.2. respond to mandatory legal or governmental requests or demands for information;
 - 9.12.3. meet national security requirements;
 - 9.12.4. enforce our agreements, policies, procedures and/or T&Cs;
 - 9.12.5. protect ourselves, our affiliates, our users, our counterparties or the general public from illegal activities; and
 - 9.12.6. respond to an emergency that requires disclosure of specified information.

Unless upon providing you with a prior notification and obtaining your consent, we will not share your Personal Information with affiliates and the third parties for their benefits. However, you are entitled to opt-out of having your Personal Information shared with third parties, or from allowing us to use your Personal Information for any purposes which are incompatible with the purposes for which we have originally collected or subsequently obtained your authorization as stipulated in this Privacy Policy.

All affiliates and third parties with whom we share your Personal Information have their privacy policies. However, they shall be expected to protect your Personal Information in accordance with the provisions as provided in this Privacy Policy.

10. **Third-Party Collection of Personal Information**

This Privacy Policy only addresses the use and disclosure of the Personal Information we collect from you. To the extent that you disclose your information to other parties through the use of YIELD Services, such as by clicking on a link to any other websites, different rules regarding Privacy

Policies may apply to their use or disclosure of the Personal Information you disclose to them.

You hereby acknowledge that we shall not be responsible for the products, services, or descriptions of products or services that you receive from the third-party websites or to the content or privacy practices of those websites. Also, this Privacy Policy shall not be applied to any such third-party products and services that you access through YIELD Platform. You knowingly and voluntarily assume all risks of using third-party websites to purchase products and services, and you agree that we shall have no liability whatsoever concerning such third-party websites and your usage of them.

11. **Your Legal Rights**

Under certain circumstances, you have the rights under the data protection laws in relation to your Personal Information. These rights include the followings:

11.1. Right to be informed

You reserve the right to be informed about the collection, use, and process of your Personal Information.

11.2. Right of access

You reserve the right to make a request for a copy of the Personal Information we hold about you and specific information regarding our processing of this information.

11.3. Right to rectify

You reserve the right to request us to update, correct, or complete your Personal Information that you believe to be outdated, inaccurate, or incomplete. You shall rectify at any time by signing into your YIELD Account and clicking the profile.

11.4. Right to erasure

You may request to have your Personal Information deleted from our record where certain conditions are met.

In order to deter fraudulent activities by ensuring that those who try to commit fraud shall not be able to avoid detection simply by closing their YIELD Accounts and opening new accounts, we shall mark your YIELD Account in our database as "Closed," but shall keep certain account information, including your request to erase your Personal Information in our database for a period of time. However, if you close your YIELD Account, your Personal information shall not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and to assist law enforcement as required by law or in accordance with this Privacy Policy.

11.5. Right to data portability

You reserve the right to request to transfer a machine-readable copy of your Personal Information to you or the third-party of your choice. We shall provide you, or the third-party, your Personal Information in a machine-readable format. This right only applies to Personal Information you have consented to us to use.

11.6. Right to restrict processing

You may request us to restrict or suppress the processing of your Personal Information under certain circumstances as follows:

11.6.1. to establish the accuracy of the Personal Information;

11.6.2. when the processing is considered unlawful, but you do not wish to have your Personal Information erased;

11.6.3. where we no longer need to process your Personal Information, but the information must be retained for legal reasons; and

11.6.4. where you have objected to our processing your Personal Information, but we need to determine whether our legitimate interest overrides your objection.

11.7. Right to object

You may object to our reliance on our legitimate interests as the basis of us processing your Personal Information which may impact your personal rights. You may also object to our processing of your Personal Information for any direct marketing purposes.

11.8. Right to withdraw consent ("Opt-out")

You reserve the right to withdraw your consent at any time where we are relying on it to process your Personal Information. Withdrawing your consent does not affect the lawfulness of our processing of your Personal Information prior to withdrawing.

If you wish to exercise these rights as aforementioned, please inform and contact us via YIELD Platform.

12. **Rights of the residents of the EEA**

If you are a resident of the EEA, United Kingdom, or Switzerland at the time your Personal Information is collected, you still reserve every legal right as stipulated in Clause 10 as mentioned above. Also, we shall specifically apply legal requirements under the GDPR for collecting, using, or processing your Personal Information.

In the case where some recipients are located outside the EEA, we shall transfer your Personal Information only to such countries as approved by the European Commission as providing an adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection in the jurisdiction of the party receiving the information.

13. **Limitation**

- 13.1. YIELD Services are not designed for the individuals who are under the age of 18 or under the legal age to provide consent under the applicable laws of the country or jurisdiction where you are using YIELD Services.

If you are not over 18 or of the legal age of your country, you shall not provide any Personal Information to us, or to engage in YIELD Services. We reserve the right to access and verify any Personal Information collected from you. If we are aware that you are under 18 or under the legal age who already shared your Personal Information with us, we shall then discard such information and terminate your YIELD Account immediately.

- 13.2. We cannot guarantee that any losses, misuses, unauthorized accession, or alteration of your Personal Information shall not occur. You hereby agree that you play a vital role in protecting your Personal Information, including your credentials. When registering with YIELD Services, you are strongly recommended to choose a password with the sufficient length and complexity and to not reveal this password to any third parties or unauthorized persons. Also, you agree that you shall immediately notify us if you become aware that unauthorized persons access your YIELD Account.

14. **Updates or amendments to the Privacy Policy**

We shall revise and update this Privacy Policy periodically, at our sole discretion, and the most current version shall be published on YIELD Platform (as reflected in the "Last Revised" heading).

In the event of any material changes which may affect your usage on YIELD Services and YIELD Platform, we shall notify you through your email address or other communication channels you provide to us. We encourage you to review this Privacy Policy actively. If you do not agree, either partially or wholly, the revised Privacy Policy, you should discontinue accessing or using our Services. Your continued access to and use of YIELD Services after any changes to this Privacy Policy constitutes your consent to any changes and agree to continue using YIELD Services.

15. **How to contact YIELD Operators**

For any questions regarding this Privacy Policy, your Personal Information collected or proceeded by us, or in case you would like to exercise one of your legal privacy rights as stipulated in Clause 10, please submit your requests to support@yield.app and visit our Website at www.yield.app.