

Privacy Policy

Nautica Group PTY Limited (we, us, or Nautica) is an Australian registered Proprietary Limited company that is part of a group of companies that provides, amongst other things, products and services within the blockchain industry, including the Nautica Exchange.

We are bound by the provisions of the privacy laws in the State of Victoria, Australia and the Australian Privacy Principles, as well as the European Union's General Data Protection Regulation (GDPR). These laws and regulations govern the way in which we may collect, use and disclose personal information about any individual (you, your, user).

This Privacy Policy sets out the manner in which we comply with our obligations under these laws and regulations. Please read the following information carefully to understand Nautica's practices regarding your information and how we will use it.

By continuing to use our website (Site) or any other services provided by Nautica on the Site, you acknowledge that you have read, understood, accept, and comply with this document, and agree to the use of data as set out in this document. If you do not agree with any of the information described in this document, you should not access the Site.

Collection, use, processing and disclosure of personal information

We collect personal information from customers for identity verification purposes under anti-money laundering and fraud prevention laws in accordance with our AML/CTF Policy. This information is required for us to provide services to you, and failure to provide requested information may result in restriction or limitation of use of our Site and services.

The type of personal information which we might collect from customers includes:

- your name;
- current and previous addresses;
- date of birth;
- telephone number;
- driver licence number;
- passport number; and
- any other information that may be relevant to serve the purpose of fully verifying your identity.

We will use and disclose this personal information insofar as necessary to comply with the law or to confirm your identity and the use of our integrated identity verification service.

For the above purposes, your personal information may be disclosed to related entities within the Nautica group of companies, government and law enforcement authorities, financial institutions, payment processors and third party service providers.

Where it is necessary to provide your personal information to third parties, we require our third-party providers and corporate customers to comply with all relevant privacy and data protection laws (including, where necessary, obtaining the appropriate express or implied consent from you at the

time your personal information is collected) in order for such information to be lawfully used for identity verification and related purposes.

We do not collect, use or disclose any sensitive information about any person. This includes a person's racial or ethnic origin, political opinion, political association, religious belief or affiliation, philosophical belief, professional or trade union or association, sexual preference, criminal record or health information.

There are also a number of limited circumstances in which we may collect personal information directly from you. This is limited to circumstances where you make direct contact with us by telephone or in writing, or via one of Nautica's Sites. The information collected in this manner will be used only for the purpose of communicating with you or otherwise in accordance with the purpose for which you provided your personal information.

Collection, use, processing and disclosure of other data

When you visit our Site, even without creating an Account with us, we may collect the following information which is sent to us by your computer, mobile device, phone, or any other device:

- your IP address and ISP information;
- your mobile network information;
- browser information;
- geographic information;
- standard web information such as referring/exit pages; and
- device information.

This information is collected to allow Nautica to provide sound administration and identify users located in jurisdictions where our services are restricted or not permitted according to our policies, as well as to monitor usage, data trend analysis, activity, and to personalize our Site accordingly.

Information collected may also be supplied to third parties with aggregated and anonymized statistical information about user activity and analysis.

Use of cookies

When you access the Site or use our products or services, we may place cookies on your computer or device. This technology is used to recognize you as a user of Nautica's services and to further assist with monitoring usage of our Site.

Nautica uses cookies or other similar technologies for the purpose of enhancing user experience while using the Site. We use the following cookies:

- Strictly necessary cookies: Cookies that are required for the full and proper functionality of the Site;
- Analytical or Performance cookies: Cookies that allow us to recognize and count the number of users that are using our Site and how they move around while they are using it. This information is used to aid us with providing better ways to improve the Site. We use a variety of analytic tools to help us analyse how users engage our website which compiles reports that

help identify ways to improve the Site. The reports that are disclosed only indicate trends, and do not provide and individual details of our visitors. If you feel the need to do so, you may opt out of our analytics at any time;

- Authentication cookies: Cookies used for user authentication, confirming identity and proper access to Site information; and
- Functionality cookies: Used to recognize you when returning to the Site.

If you wish, you may control the use of cookies from your browser by manually deactivating this feature via your browser settings. However, blocking or disabling some cookies may result in the failure of Sites functions resulting in negative experience.

Nautica is not obligated to place cookies on your computer and may do it at its own discretion.

Third party content

Some of the content on our Site may include applications made available by third parties, such as advertising and social media buttons or links that allow you to share content or links to our Site. These third party applications themselves may collect information for those third parties.

Although we use reasonable efforts to ensure that third party content and applications comply with our privacy requirements, we are not responsible for the technical operation of these applications or the collection and use of information by those third parties and any information provided by you to third parties is provided at your own risk.

Security

We take all reasonable steps (including the employment of appropriate security systems and procedures) to ensure all data held by us is safe and secure. Such security measures include but not limited to physical protection and electronic encryption to prevent any unauthorised access, authentication cookies, multilayered Site access protocol.

Access and correction

You have a right to access your personal information, subject to some exceptions allowed by law. If you wish to access your personal information, you should contact us via the Nautica Support page on our Site. We reserve the right to charge a fee for searching for and providing access to your information.

We take all reasonable steps to ensure that any personal information that we collect and use is accurate, complete and up-to-date. We may, under our discretion or required by law, require updates or corrections of your personal information. Nautica will insure sufficient time is provided for you to supply the information, however depending on circumstances, we may request it within a limited timeframe. Where such information is required, we will not be liable or held accountable for your availability to provide them information, or for any loss you may incur.

Destruction

Deactivation of your Account does not automatically cause your personal information to be destroyed. Generally, personal information that we collect will be held for a minimum of 7 years to comply with our record keeping requirements.

Where we determine, acting reasonably, that personal information held in respect of an individual is no longer needed for our functions or the services we provide, we will permanently destroy or de-identify that information.

If you wish for us to destroy any of your personal information collected by us, we will do so only where we determine that it is not necessary for us to hold such information and doing so will not be in breach of our AML and other legal requirements.

Complaints

If you believe that Nautica at any time is in breach of this Privacy Policy, or that our use of your information does not respect your privacy, you can make a complaint via the Nautica Support page on our Site.

We will endeavour to respond to any complaints that we receive within a reasonable timeframe, taking into account volume of complaints received, the complexity and nature of your complaint.

Amendments to the policy

We may from time to time vary this Privacy Policy. We will endeavour to provide you with notice of any changes made to our Privacy Policy, however please check our Site regularly for an up-to-date version of the document.

If you do not agree with any changes to our Privacy Policy, you should immediately cease use of our Site and any other products or services governed by the Privacy Policy. Your continued use of the Site, products or services will indicate your acceptance and agreement with the updated Privacy Policy.

