

1. Introduction

Welcome! Thanks for visiting “www.tycoonfin.com”, a digital asset exchange platform.

Use of the words “**Tycoon Fintech**”, “**we**,” “**us**,” or “**our**” refer to any or all Tycoon Fintech entities and their affiliates. This Privacy Policy explains what Personal Information (as defined below) we collect, why we collect it, how we use and disclose it, your choices, any rights you may have, and how you can contact us about our privacy practices. By continuing to use Tycoon Fintech, you agree to this Privacy Policy. This Privacy Policy does not apply to third-party websites, products, or services, even if we provide links to them or they link to us.

Your privacy matters to us so whether you are new to Tycoon Fintech 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, and understand that we reserve the right to change any of our policies and practices at any time. You can always find the latest version of this Privacy Policy here on this page.

This table below describes which Tycoon Fintech entity or entities you are engaging with, which determines the means and purposes of processing your Personal Information.

Please note that our Services and Site are not intended for minors below the age of 18 years and we do not knowingly collect data relating to minors. In case we have collected personal data of a minor below the age of 14 years , parents and/or guardians of the minor may notify us at “Customercare@tycoonfin.com” and necessary actions to remove such data shall be undertaken.

2. Purpose

This Privacy Policy aims to give you information on why and how we collect and process your personal data.

This Privacy Policy informs you about your privacy rights and how the data protection principles set out in the Indian Information Technology (Intermediaries

guidelines) Rules, 2021, the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021, the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 of Information Technology Act, 2000 amended through Information Technology Amendment Act, 2008 EU General Data Protection Regulation (“GDPR”) and the Personal Data Protection Act, 2012 protects you. It is important that you read this Privacy Policy together with any other notice or policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of why and how we are using your data. This Privacy Policy supplements other notices and policies and is not intended to override them.

Please note that all or part of our Services may not be available in your region.

A. Personal information We collect from you

Personal information typically means information that identifies or is reasonably capable of identifying an individual, directly or indirectly, and information that relates to, describes, is reasonably capable of being associated with or could reasonably be linked to an identified or reasonably identifiable individual. This is a broad definition which includes the specific pieces of personal data which we have described below. It does not include data which cannot be used to identify an individual person, such as a company registration number.

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

- **Identification Information**, such as name, phone number, email address, and/or government-issued identity documents;
- **Commercial Information**, such as trading activity, order activity, deposits, withdrawals, account balances;
- **Financial Information**, such as payment card details, stored value accounts, amounts associated with accounts, external account details;
- **Correspondence**, such as information that you provide to us in correspondence, including account opening and customer support;
- **Profile Information**, such as your username and password, identification number as our user, request by you related to products and services, your interests, preferences and feedback, and any other information generated by

you when you communicate with us, for example when you address a request to our customer support.

- **Sensory Information**, such as images and videos collected for identity verification, audio recordings left on answering machines;
- **Biometric Information**, such as scans of your face geometry extracted from identity documents;
- **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 document).

B. Personal Information we collect automatically

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

- Technical Information, such as Internet connectivity data, Internet Protocol (IP) address, login data, browser type and version, device type, category type and model, domain name, time zone setting and location data,;
- Device Information, such as hardware, operating system, browser plug-in types and versions; and
- Usage Data, such as system activity, internal and external information related to Tycoon Fintech pages that you visit, clickstream information

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

C. Personal Information we collect from third parties

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

- Identification Information, as defined above;
- Financial Information, as defined above;
- 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 Information about you, may be able to identify you from a blockchain transaction because, in some circumstances, Personal Information published on a blockchain (such as your Digital Asset address and IP address) can be correlated with Personal Information that we and others may have. Furthermore, by using data analysis techniques on a given blockchain, it may be possible to identify other Personal Information about you);
- Credit and Fraud Information, such as credit investigation, credit eligibility, identity or account verification, fraud detection, or as may otherwise be required by applicable law; and
- Additional Information, as permitted by law or required to comply with legal obligations, which may include criminal records or alleged criminal activity, or information about any person or corporation with whom you have had, currently have, or may have a financial relationship.

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

If you refuse to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you refuse to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you – for example, to provide you Services. In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How We Collect your data

We use different methods to collect information from and about you, including through:

- A. Direct interactions:** You may give us your Data mentioned above in the tabular column by directly interacting with us, including by filling in forms, by email or otherwise. This includes personal data you provide when you:
- visit our Site;
 - apply for our Services;
 - create an account;
 - make use of any of our Services;

- request marketing to be sent to you, for example by subscribing to our newsletters;
- enter a competition, promotion or survey, including through social media channels;
- give us feedback or contact us.

B. Automated technologies or interactions: As you interact with us via our Site, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We will also collect Transitional Data, Investment Data and Usage Data.

- C.** We use different meThird parties or publicly available sources. We also obtain information about you from third parties or publicly available sources. These sources may include:
- public blockchain,
 - publicly available information on the Internet (websites, articles etc.)

4. How We use your Personal Information

The Personal Information 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 Tycoon Fintech

We will only use your personal data when the applicable legislation allows us to. In other words, we have to ensure that we have a lawful basis for such use.

Most commonly, we will use your personal data in the following circumstances:

- A. Performance of a contract:** Which means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract; we use this basis for provision of our Services;
- B. Legitimate interests:** Which means our interests (or those of a third party), where we make sure we use this basis as far as your interests and individual rights do not override those interests;

C. Consent: Which is freely given, specific, informed and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to you; under specific circumstances this consent should be explicit - if this is the case, we will ask for it properly.

5. Purpose of using your Personal Information

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

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

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

D. Other business purposes: We may use your Personal Information for additional purposes in the operation of our business, that would be reasonably expected based on context, and as permitted by law or required to comply with our legal obligations.

E. Market our products to you: We may contact you with information about our products and services that we believe may be of interest to you. You may use tools that we provide to opt out of marketing communications from us at any time.

F. Cookies: You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Services or Site may become inaccessible or not function properly. For more information about the cookies we use, please review the Cookie Preferences.

Disclosure of Your personal information

6. International transfers

We share your personal data within our group. This will involve transferring your personal data outside India.

Many of our external third parties are based outside India so their processing of your personal data will involve a transfer of data outside India.

Whenever we transfer your personal data out of the India, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented the country to which we transfer your personal data has been deemed to provide an adequate level of protection for personal data by Global Privacy Standards;

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA or Singapore.

7. Data Security

While there is an inherent risk in any data being shared over the internet, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, damaged, or accessed in an unauthorised or unlawful way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Depending on the nature of the risks presented by the proposed processing of your personal data, we will have in place the following appropriate security measures:

- **organisational measures** (including but not limited to staff training and policy development);
- **technical measures** (including but not limited to physical protection of data, pseudonymization and encryption); and
- **securing ongoing availability, integrity, and accessibility** (including but not limited to ensuring appropriate back-ups of personal data are held).

We have put in place procedures to deal with any suspected personal data breach and will notify you and any relevant regulator of a breach where we are legally required to do so.

8. Data Retention

- We retain your Personal Information for as long as is reasonably necessary to provide services to you, for our legitimate business purposes, and to comply with our legal and regulatory obligations. If you close your account with us, we will continue to retain your Personal Information as necessary to comply with our legal and regulatory obligations, including for fraud monitoring, detection and prevention; and for our tax, accounting, and financial reporting obligations.

Please note that under certain condition(s), you can ask us to delete your data by contacting us at "Customercare@tycoonfin.com"

9. Your Legal Rights

You have rights we need to make you aware of. The rights available to you depend on our reason for processing your personal data. If you need more detailed information or wish to exercise any of the rights set out below, please contact us at "Customercare@tycoonfin.com"

You may:

- Request access to your personal data, which enables you to obtain confirmation of whether we are processing your personal data, to receive a copy of the personal data we hold about you and information regarding how your personal data is being used by us;
- Request rectification of your personal data by asking us to rectify information you think is inaccurate and to complete information you think is incomplete, though we may need to verify the accuracy of the new data you provide to us;
- Request erasure of your personal data by asking us to delete or remove personal data we hold about you; note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you;
- Object to the processing of your personal data, where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on

this ground as you feel it impacts on your fundamental rights and freedoms; in some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms; you also have the right to object where we are processing your personal data for direct marketing purposes;

- Require that decisions be reconsidered if they are made solely by automated means, without human involvement; you will be notified if decisions are made solely on an automated basis;
- Request restriction of processing your personal data, which enables you to ask us to suspend the processing of your personal data, if you want us to establish the data accuracy; where our use of the data is unlawful, but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims, or if you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it;
- Request the transfer of your personal data to you or to a third party, and we will provide to you, or a third party you have chosen (where technically feasible), your personal data in a structured, commonly used, machine-readable format; note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- Withdraw consent at any time where we are relying on consent to process your personal data; however, this will not affect the lawfulness of any processing carried out before you withdraw your consent; if you withdraw your consent, we may not be able to provide certain products or services to you, but we will advise you if this is the case at the time you withdraw your consent;
- Complaint to any relevant authority about any perceived violation and to seek compensation for damages in the courts.

10. Contact Us

If you have questions or concerns regarding this policy or our processing of your Personal Information, please feel free to email us at: "Customercare@tycoonfin.com"; or write to us at: "Customercare@tycoonfin.com"

