

## PRIVACY POLICY

This Privacy Policy ("Policy") is an agreement between You ("User", "You") and Web4 Solutions Limited, company registration code: 239845, legal address of the company: Suite 3, 1st Floor, La Ciotat Building, Mont Fleuri, Mahe, Seychelles (" Company", " We ").

Below are our contact details:  
Site: <https://demi.gg> ("Site").

### 1. General provisions

- 1.1. In accordance with the Policy, the personal data of Users collected by the Company is processed in accordance with the General Data Protection Regulation ("GDPR") and other legal acts.
- 1.2. Company in accordance with the applicable legal requirements, shall ensure the confidentiality of personal data and the implementation of appropriate technical and organizational measures to protect personal data from unauthorized access, disclosure, accidental loss, alteration, destruction, or other unlawful processing.
- 1.3. This Policy sets out our current data protection and privacy policy and obligations and is an integral part of the Terms of Use (the "Agreement"). Accordingly, We strive to collect and process only data strictly necessary in the context of our relationships with (potential) customers, (future) partners, users/visitors of our Site and online resources, in order to provide services and/or information for specific and legitimate purposes.
- 1.4. We post the Policy on the Site page in its most recent version. Please read it carefully. By accessing and/or using the information on the Site, You confirm that You have read, understood and agree to this Policy, which is an integral part of the Agreement.
- 1.5. This Policy is an integral part of the Agreement.
- 1.6. The Company reserves the right, at its sole discretion, to change this Policy at any time by publishing an updated version of the Policy on the Site. The amended or updated version of this Policy comes into force from the moment it is published on the Site.
- 1.7. The processing of cookies is regulated by a separate document posted on the Site. Please follow the provisions of the Cookie Policy when considering issues related to cookies.

### 2. Types of information We collect about You

- 2.1. The main purpose for which the Company collects Your personal data is to provide You with access and usefulness through our digital platform using software, API (application program interface), technologies, products and/or functionality ("Services"). In the course of providing You with the Service, in order to comply with

laws and improve the Service, we need to collect and store personal information about You.

## 2.2. The Company will collect and process the following data about You:

### 2.2.1. Information You give us.

You may give us information about You when You sign up to use our Services, e.g. when You provide us with personal details like Your name, phone number, and email address. This also includes information You provide through Your continued use of our Services, through entering a promotion or survey, and by reporting problems with our Services. The information You give us may include Your name, date of birth, address, email address, phone number, identity information (e.g. identity documents), financial information (e.g. credit card, debit card information), geographical location, personal description, and photograph. In some cases, such as when You send or receive high value or high volume transactions, or where We need to comply with anti-money laundering regulations, We may also need more commercial or identification information from You.

### 2.2.2. Information We collect about You.

With regard to Your use of our Services, the Company may automatically collect the following information:

- details of the transactions You carry out when using our Services;
- technical information, including the Internet protocol (IP) address used to connect Your computer to the internet, Your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform;
- information about Your visit, including the full Uniform Resource Locators (URL) clickstream to, through, and from our Site (including date and time); products You viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer support number.

### 2.2.3. Information We receive from other sources.

The Company may receive information about You if You use any of the other Sites We operate or the other services We provide.

The Company may also receive information that You transmit to third parties when using the Site (for example, from an online payment service or from an organization that provides user verification).

## 2.3. Data retention period: Unless otherwise stipulated by law, You agree that We have the to retain all the collected personal information for the duration You use our Services and for 5 (five) or 8 (eight) more years after You withdraw from it, and delete it if the data is no longer subject to a legal obligation to which Company is subject to.

The retention period may be extended for a period not exceeding 1 (one) year, provided there is a reasoned request from a competent authority.

- 2.4. We do not collect information from children or other people who are under 18 years old. If You are under 18 years old, You may not submit any personal data to us or subscribe for the Company.

### 3. How We protect Your personal information

The Company keeps Your personal information secure using industry-standard encrypted secure storage, has implemented a number of security measures to ensure that Your information has not been lost, misused or altered, including, but not limited to:

#### 3.1. Physical Measures

Materials containing Your personal data will be stored in a locked place.

#### 3.2. Electronic Measures

Computer data containing Your personal data will be stored on computer systems and storage media that are subject to strict log-in restrictions.

#### 3.3. Management Measures

Only authorized employees are permitted to come into contact with Your personal data and such employees must comply with our internal confidentiality rules for personal data.

#### 3.4. Technical Measures

Encryption technology may be used to transmit and store Your personal data. We use various currently available security technologies and management systems to minimize the risks that Your information may be disclosed, damaged, misused, accessed without authorization, disclosed without authorization, or altered. Our technical security team proactively monitors for abnormal and malicious activity on our servers and Site.

#### 3.5. Other Measures

We endeavor to protect Your information from unauthorized access, alteration, disclosure, or destruction of personal data We collect and store. We take various measures to ensure information security, including encryption of our communications with You; required two-factor authentication for all sessions; periodic review of our personal data collection, storage, and processing practices; and restricted access to Your personal data on a need-to-know basis for our employees and vendors who are subject to strict contractual confidentiality obligations. Please note that it is impossible to guarantee 100% security of information. As such, Company requests that You understand the responsibility to independently take safety precautions to protect Your own personal information. You agree that the Company shall not be liable for any information leakage and other losses not caused by our intention or gross negligence, including but not limited to hacker attack, power

interruption, or unavoidable technical failure, to the maximum extent permitted by law. If You suspect that Your personal information has been compromised, especially account and/or password information, please immediately contact us.

#### 4. Ways We use Your information

We use the information We collect about You for the following purposes or in the following ways:

##### 4.1. To provide our Services

The Company uses the information collected to carry out our obligations relating to You, to provide You with information, products and Services, to deliver, maintain, and provide better Services and verify Your identity. We use the IP address and unique identifiers stored in Your device's cookies to help us authenticate Your identity and activities and provide Services.

##### 4.2. To protect our users

We use the information collected to protect our platforms, users' accounts, and archives. We use IP addresses and cookies to protect against automated abuse such as spam, phishing, and DDoS attacks. The Company analyzes Your activities in our Site with the goal of detecting suspicious behaviors as early as possible to prevent potential fraud and loss of funds to bad actors.

##### 4.3. To comply with legal and regulatory requirements

With respect to the privacy and security of personal data, The Company will use the information in compliance with our legal obligations, government requests, and reasonable user-generated inquiries.

##### 4.4. For research and development purposes

The Company actively measures and analyzes data for the administration of our Service and for internal operations, including troubleshooting, data analysis, testing, research, statistics and surveys, as well as to understand how You use our Services and interact with them. This review is carried out by our operational teams in order to continuously improve the Site and eliminate problems with the user interface. In addition, the Company uses such information to configure, measure and improve the operation of the Site, as well as to develop new Services. We constantly monitor information about activity in our systems and our communications with users in order to identify and quickly fix problems.

##### 4.5. To communicate with You

We use personal information collected, like Your phone number or email address, to interact with You directly when providing customer support on a ticket or to keep You informed on logins, transactions, account security, and other aspects, or to notify You about changes to our Services. Without collecting and processing Your personal information for confirming each communication, Company will not be able to respond to Your submitted requests, questions, and inquiries. All direct communications are properly kept at Company or the Company provider designated by the Company, to

be reviewed for accuracy, kept as evidence, or used to perform other statutory or contractual obligations.

4.6. To secure compliance with our terms and conditions

The collected information is also used to continually and actively enforce our terms and conditions, including but not limited to reviewing, investigating, and preventing any potentially prohibited or illegal activities that may violate the foregoing provisions, or disclosing the relevant information to a third party in accordance therewith. Company reserves the right to suspend or terminate provision of any Company to any user found to be engaged in activities that violate our terms and conditions.

4.7. For marketing and advertising

The Company may share Your personal information with our marketing partners for the purposes of targeting, modeling, and/or analytics, as Well as marketing and advertising.

4.8. For other purpose

The Company may disclose Your personal information for any other purpose You consent to.

5. Legal bases for processing

5.1. When We process Your personal data, we will rely on one of the following legal grounds for processing. We may process Your personal data legally depending on the specific purpose for which we use Your data.

5.1.1. Performance of a contract

This is when the processing of personal data is needed in order to perform our obligations under a contract (to provide Services) concluded with You.

5.1.2. Legal obligation or for public interest

The Company is obliged to process Your personal data in accordance with legal obligations. The purposes of processing include identity verification, prevention of money laundering and fraud, risk control measures, as well as providing information to a competent authority, government agency or law enforcement agency.

5.1.3. Legitimate interests

Where necessary, the Company may process personal data where there is a legitimate interest for us or a third party in pursuing commercial and business interests, except where such interests are overridden by Your interests, fundamental rights, and freedoms.

5.1.4. Your consent

The Company may ask You for specific permission to process personal information for specific purposes. Your data will be processed in this way if You agree to this. Where the legal basis is the consent You provided, You may withdraw Your consent any time. The revocation of Your consent will not affect the legality of the data processed prior to the revocation.

## 6. Who receives Your personal data

6.1. The Company receives Your personal data in order to carry out requests, and provide Services, and perform our contractual and legal obligations.

6.2. We will not share personal data with third parties unless this is necessary for our legitimate business needs, to carry out requests, provide Services and/or as required or permitted by law. Third parties under these circumstances include:

### 6.2.1. Service providers

The Company will disclose personal data to third party partners and Service providers (processors) so they can process it on our behalf where required. These Service providers are required to provide sufficient assurances in accordance with data protection law. (e.g. being bound contractually to confidentiality and data protection obligations). We will only share personal data necessary for them to provide their Services.

### 6.2.2. Auditors, advisors, consultants

We may disclose personal data for purposes and in the context of audits (e.g. external audits, security audits) to legal and other advisors in order to investigate security issues, risks, complaints, etc.

As such, personal data may be transferred and disclosed to:

- Money laundering and fraud prevention agencies, compliance Services and risk prevention. This is required in order to verify Your identity, ensure protection against fraud, confirm eligibility for our Services /products;
- banks (other credit and financial Company institutions), and similar institutions. These enable us to provide our Services;
- Payment Systems (SWIFT, SEPA, Visa, Mastercard, etc.), payment Company providers, card processing companies. These enable us to provide our Services;
- data management, storage, archiving, cloud storage Company providers;
- companies assisting us with the provision of our Services (e.g. technological services, solutions, support such as support/maintenance/development of IT applications, technology, Site management, telephony/SMS services) ;
- customer support Company providers and marketing Company providers;
- administrative Company providers;
- Auditing and accounting services and consultants;
- external legal advisors.

### 6.2.3. Regulatory authorities, law enforcement, courts

The Company may disclose personal data to comply with applicable legislation, regulatory obligations, to respond to requests of regulatory authorities, government and law enforcement agencies, courts, and court orders.

#### 6.2.4. Other persons

Other recipients may be any person/legal entity/organization for which You ask Your data to be transferred to (e.g. reference etc.) or give Your consent to transfer personal data.

#### 6.3. The Company may also disclose Your data in circumstances such as the following:

- If We are under a duty to disclose or share Your personal data in order to comply with any legal or regulatory obligation or request;
- In order to apply or enforce the terms and conditions or any other agreement in place in the context of our relationship and to investigate potential breaches;
- In order to protect our rights, safety, or property, or that of our customers or third parties/the public. This includes exchanging information with other companies and organizations for the purposes of money laundering, fraud prevention, and equivalent risks.

#### 7. Transfers to international organizations

##### 7.1. Your personal data may be transferred to third countries or to international organizations if the transfer is necessary and has a legal basis as described in this document. Such transfers take place, for example:

- when it is necessary to carry out in the context of the Services;
- under applicable law;
- on the basis of Your instructions or consent.

In the context of data processing undertaken by third parties on our behalf. Such staff may be performing technical duties and support, duties related to processing of Your orders, provision of support Services etc.

#### 8. Automated Decisions and Profiling

##### 8.1. We sometimes use systems to make suggestions or assist in decisions, including profiling, based on personal information We have, or that We are allowed to collect from other authorised sources about You.

This helps us ensure our decisions are quick, fair, efficient, and correct based on what We know. These automated processes can affect the products, Companies or features We may offer You now or in the future.

The types of automated decisions We make may include:

- tailored Services: Company may place You in groups with similar customer segments. We use these to study and learn about our customers' needs, and to make decisions based on what We learn. This helps us design products and Services for different customer segments, and manage our relationships with them;

- detecting fraud: We use Your personal information to help us decide if Your personal accounts are potentially used for fraud, money-laundering or terrorist financing or if You are under international sanctions. We may detect that an account is being used in ways that fraudsters work or in a way that is unusual for You or Your business. If We think there is a risk of fraud, We may stop activity on the accounts or refuse access to them.

## 9. Your rights

- 9.1. Subject to applicable laws, You may have the right to access information We hold about You. Your right of access can be exercised in accordance with the relevant data protection legislation. If You have any questions in relation to our use of Your personal information, contact us.

Under certain conditions, You may have the right to require us to:

- provide You with further details on the use We make of Your information;
- provide You with a copy of the information that You have provided to us;
- update any inaccurate, incorrect, or out of date personal information We hold;
- delete any personal information that is no longer necessary or no longer subject to a legal obligation to which Company is subject to;
- where processing is based on consent, to withdraw Your consent so that We stop that particular processing;
- cease direct marketing to You by contacting us or adjusting Your notification preferences in the settings section of Your account;
- where We undertake wholly automated decision making which results in the creation of a legal obligation or a similar significant impact, You may request that We provide information about the decision-making methodology and ask us to verify that the automated decision has been made correctly. We may reject the request, as permitted by applicable law, including when providing the information would result in a disclosure of a trade secret or would interfere with the prevention or detection of fraud or other crime. However, generally in these circumstances We will verify that the algorithm and source data are functioning as anticipated without error or bias or if required by law to adjust the processing;
- object to any processing based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to Your data protection rights;
- restrict how We use Your information whilst a complaint is being investigated.

- 9.2. Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

## 10. Right to file a complaint

- 10.1. If You have any complaints about the use of Your data, exercise of Your rights, please notify and/or file a complaint with us at the contact details indicated below. We will immediately investigate and inform You in regards to Your complaint.
- 10.2. Complaints must be made in English in a comprehensive manner, and contain sufficient details and a clear description of the complaint. The Company will not be



able to process requests which are incomprehensible or in languages other than English.

- 10.3. You can also file a complaint with the supervisory authorities, but if the complaint has not been previously sent to us, We can use this fact as evidence of Your unwillingness to settle the issue in a pre-trial manner.

## 11. Third-party links

Our Company may, from time to time, contain links to and from the Sites of our partner networks, advertisers, and affiliates. If You follow a link to any of these Sites, please note that these Sites have their own privacy policies and that We do not accept any responsibility for them. Please check these policies before You submit any personal data to these Sites.

## 12. Changes to our Policy

In order to keep up with changing legislation, best practices and changes in how we handle personal information, we may update this Policy from time to time when necessary, taking into account current circumstances.

You must regularly check the terms of this document for changes and/or additions. Your continued use of the Site and Services after making changes and/or additions to this Policy means acceptance and consent of the User with such changes and/or additions.

## 13. Contact

- 13.1. Please send any questions, comments, or requests regarding this Policy to our privacy team at the address indicated on the Site. We will have 30 days upon the receipt of Your request to review it.
- 13.2. If You feel that We have not addressed Your questions or concerns adequately, or if You believe that Your data protection or privacy rights have been infringed, You can complain to Your national data protection authority or other public body with responsibility for enforcing privacy.