#### **Privacy Policy**

Effective date: March 20, 2023

We take your privacy seriously. This Privacy Policy describes how we collect, use and share your personally identifiable information ("**Personal Information**") that we receive from you when you visit our website or which we otherwise receive or collect from you in the course of, or in connection with, your use of our site located at https:www.swiftco.io and all associated sites (the "**Website**"), the pursuit of our mission to (our "**Services**") and our operations. Please read the following to learn more about our Privacy Policy. This Privacy Policy covers our treatment of Personal Information that we gather when you are accessing or using our Website and Services, but does not apply to the practices of companies we don't own or control, or people that we don't manage. When we mention "**Swiftco**" "we," "us" or "our" in this Privacy Policy, we are referring to Swiftco International Corporation.

By using or accessing the Website and the Services in any manner, you acknowledge that you accept the practices and policies outlined in this Privacy Policy, and you hereby consent that we will collect, use, and share your information in the following ways.

We're constantly trying to improve our Website and Services, so we may need to change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy and, in some cases, we may provide you with additional notice (such as adding a statement to our Website or sending you a notification). We encourage you to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

Remember that your use of our Website and Services is always subject to the terms and conditions. Any terms we use in this Privacy Policy without definition can be found in the Terms and Conditions

#### WHAT DOES THIS PRIVACY POLICY COVER?

We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with the Website and our Services, including to provide, and improve our services, to contact you, to fulfill your requests for certain products and services, and to analyze how you use the Website and the Services. In certain cases, we may also share some Personal Information with third parties, but only as described below.

We do not knowingly collect or solicit Personal Information from anyone under the age of 18. If you are under 18, please do not attempt to send any Personal Information about yourself to us. If we learn that we have collected Personal Information from a child under age 18, we will delete that information immediately. If you believe that a child under 18 may have provided us with Personal Information, please contact us at <u>legal@swiftco.io</u>

# WHAT PERSONAL INFORMATION DOES SWIFTCO INTERNATIONAL CORPORATION COLLECT?

**Information you provide to us:** We receive and store any information you knowingly provide to us. For example, you share information directly with us when you fill out a form, submit or post content through our Services, make a purchase, communicate with us via third-party platforms, participate in a contest or promotion, request customer support, or otherwise communicate with us. The types of personal information we may collect include your name, email address, postal address, phone number, social media, payment information, personal documents by way of passport or National ID card or drivers licence, your wallet address, and any other information you choose to provide. We may communicate with you if you've provided us the means to do so. For example, if you've given us your email address, we may email you about your use of the Services. Also, we may receive a confirmation when you open an email from us. This confirmation helps us make our communications with you more interesting and improve our Services. If you do not want to receive communications from us, please opt out via the email or otherwise by emailing support@swiftco.io.

**Information collected automatically:** Whenever you interact with our Website, we automatically receive and record information on our server logs from your browser or device, which may include your IP address, geolocation data, device identification, "cookie" information, the type of browser and/or device you're using to access the Website, and the page or feature you requested. "Cookies" are identifiers we transfer to your browser or device that allow us to recognize your browser or device and tell us how and when pages and features in our Services are visited and by how many people. You may be able to change the preferences on your browser or device to prevent or limit your device's acceptance of cookies, but this may prevent you from taking advantage of some of our features. For more information about the access and restriction of cookies, the information below goes in detail in how we process and collect your personal information.

We may use this data to improve the Services – for example, this data can tell us how often users use a feature of the Services or Website, and we can use that knowledge to make the Services interesting to as many users as possible.

**Information collected from other websites and do not track policy:** Through the cookies we place on your browser or device, we may collect information about your online activity after you leave the Website. Just like any other usage information we collect, this information allows us to improve the Website and the Services, and is otherwise used as described in this Privacy Policy. Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioural advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Website does not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Website or the Services and after you leave.

# HOW DOES SWIFTCO INTERNATIONAL CORPORATION USE MY INFORMATION?

We use the Personal Information we collect to maintain, and improve our Services and Website. We also use the Personal Information we collect to:

- Know Your Client in onboarding for the purchase of Swiftco and that such purchase isn't by means of Anti Money Laundering or by of any other illegal means;

If you elect, communicate with you about products, services, and events offered by Swiftco International Corporation and others and provide news and information that we think will interest;

- Process transactions and send you related information, including confirmations, receipts, invoices, customer experience surveys, and notices;
- Send you technical notices, security alerts, and support and administrative messages;
- Respond to your comments and questions and provide customer service;
- Monitor and analyze trends, usage, and activities in connection with our Services;
- Personalize the advertisements you see on third-party platforms and websites;
- Facilitate contests, sweepstakes, and promotions and process and deliver entries and rewards;
- Detect, investigate, and prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and protect the rights and property of Swiftco International Corporation and others;
- Debug to identify and repair errors in our Services;
- Comply with our legal and financial obligations; and
- Carry out any other purpose described to you at the time the information was collected.

# WILL SWIFTCO INTERNATIONAL CORPORATION SHARE ANY OF THE PERSONAL INFORMATION IT RECEIVES?

We may share your Personal Information with third parties such as Name and Email address, as described in this section with:

**Information that's been de-identified:** We may de-identify your Personal Information so that you are not identified as an individual, and provide that information to our partners. We may also provide aggregate usage information to our partners (or allow partners to collect that information from you), who may use such information to understand how often and in what ways people use our Services, so that they, too, can provide you with an optimal online experience. However, we never disclose aggregate usage or de-identified information to a partner (or allow a partner to collect such information) in a manner that would identify you as an individual person.

Affiliated businesses: Name, Email address and Postal address

**Agents:** We employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you; for example, we may use a biometrics company to receive and process your personal identification for us. Unless we tell you differently, our agents do not have any right to use the Personal Information we share with them beyond what is necessary to assist us.

**Community groups:** Name and Email address

**Acquisition:** Name, Personal documents, payment details, email address, Social Media, Postal address and Wallet address

**Protection of Swiftco International Corporation and others:** We reserve the right to access, read, preserve, and disclose any information that we believe is necessary to comply with law or court order; enforce or apply our terms of service and other agreements; or protect the rights, property, or safety of Swiftco International Corporation, our users, or other persons.

## PROCESS OF INFORMATION

Our services may process your Personal Information to, or store or access it in, jurisdictions that may not provide levels of data protection that are equivalent to those of your home jurisdiction. We will take steps to ensure that your Personal Information receives an adequate level of protection in the jurisdictions in which we process it.

### YOUR CHOICES

**Cookies.** Most web browsers are set to accept cookies by default. If you prefer, you can usually adjust your browser settings to remove or reject browser cookies. Please note that removing or rejecting cookies could affect the availability and functionality of our Services. **Communication Preferences.** You may opt out of receiving promotional emails from Swiftco International Corporation by following the instructions in those communications or by emailing us at <u>support@swiftco.io</u> If you opt out, we may still send you non-promotional emails, such as those about our ongoing business relations.

Advertising and Analytics: We allow others to provide analytics services and serve advertisements on our behalf across the web and in mobile apps. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Website and Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages, links clicked, and conversion information. This information may be used by Swiftco International Corporation and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites, and better understand your online activity

### ADDITIONAL DISCLOSURES FOR INDIVIDUALS IN EUROPE

If you are located in the EEA, the United Kingdom, or Switzerland, you have certain rights and protections under the law regarding the processing of your Personal Information, and this section applies to you.

**Legal Basis for Processing:** When we process your Personal Information, we will do so in reliance on the following lawful bases:

To perform our responsibilities under our contract with you (e.g., processing payments for and providing the Services you requested).

When we have a legitimate interest in processing your Personal Information to operate our business or protect our interests (e.g., to provide, maintain, and improve our products and services, conduct data analytics, and communicate with you).

To comply with our legal obligations (e.g., to maintain a record of your consents and track those who have opted out of marketing communications).

When we have your consent to do so (e.g., when you opt in to receive marketing communications from us). When consent is the legal basis for our processing of your Personal Information, you may withdraw such consent at any time.

**Data Retention:** We store Personal Information for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

**Data Subject Requests:** Subject to certain limitations, you have the right to request access to the Personal Information we hold about you and to receive your data in a portable format, the right to ask that your Personal Information be corrected or erased, and the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, please email us at <a href="mailto:support@swiftco.io">support@swiftco.io</a>

**Questions or Complaints:** If you have a concern about our processing of Personal Information that we are not able to resolve, you have the right to lodge a complaint with the Data Protection Authority where you reside.

#### CERTAIN INFORMATION FOR CALIFORNIA RESIDENTS

The California Consumer Privacy Act or "CCPA" (Cal. Civ. Code § 1798.100 *et seq.*) affords consumers residing in California certain rights with respect to their personal information. If you are a California resident, this section applies to you.

**California Consumer Privacy Act**: In the preceding 12 months, we have collected the following categories of Personal Information: identifiers, commercial information, internet or electronic network activity information, professional or employment related information, education information, financial information, and information derived from other personal information about you. We collect Personal Information for business and commercial purposes. In the preceding 12 months, we have disclosed the following categories of personal information for business purposes to the following categories of recipients:

### **Category of Personal Information**

Identifiers;

Commercial Information;

Internet or other electronic network activity information;

Professional or employment information;

Education information;

Financial information; and

Information derived from other personal information about you.

#### **Categories of Recipients**

Partners, including vendors and service providers;

Companies under common control and ownership; and

Apps, websites, and third-party integrations on or using our Website or Services.

Swiftco International Corporation does not sell your personal information. We do not allow by way of advertising, partners to collect personal information.

#### WHAT IF I HAVE QUESTIONS ABOUT THIS POLICY?

If you have any questions or concerns regarding our policies, please do contact us at <u>legal@swiftco.io</u>, and we will try to resolve your concerns.