

Privacy Policy

1. Purpose

Our Privacy Policy explains how KABN Systems NA Holdings Corp. and its subsidiary, KABN Systems North America Inc., effectively (the "Companies") and the digital on-boarding, Know-Your-Customer (KYC) and Anti-Money Laundering (AML) companies that the Companies works with collect, use, store and disclose your personal information. It also describes the choices available to you concerning the use of, your access to, and how to update and correct your personal information.

2. Scope

This Privacy Policy applies to personal information that the Companies collect when you use or access our web and mobile applications, www.kabnnaholdco.com, and other Services offered by the Companies that mention this policy (collectively referred to as "Services").

"Personal Information" is defined as any information about an identifiable individual.

Personal information will be handled by the Companies in accordance with the *Personal Information Protection and Electronic Documents Act* ("PIPEDA") and this Privacy Policy.

3. Consent

When you sign up for a user account, the Companies will ask for your express consent to the collection, use, disclosure and retention of your personal information as outlined in this Privacy Policy and for any other purposes identified to you at the time of collection. To verify your identity, the Companies will ask for your express consent to the collection, use, disclosure and retention of specific personal information including ID documentation, and a "selfie" picture of yourself. Additional documentation in the form of a utility bill or bank statement may be required. You have the right to withdraw your consent at any time. However, if you choose to withdraw your consent with respect to any information that the Companies collects in order to provide the Services to you, we will no longer be able to provide the Service to you. You may always opt out of the collection, use and disclosure of your personal information for any marketing purposes without affecting your use of the Services.

4. Security

The Companies takes commercially reasonable measures to help safeguard your personal information from loss, disclosure, alteration, misuse and unauthorized access, theft and destruction. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your data that they will protect the data with adequate safeguards. As the internet is not 100% secure, The Companies cannot guarantee the absolute security of your information. We do not accept liability for unintentional disclosure. The Companies are not responsible for the security of information that you transmit to us over networks that the Companies do not control, including the internet and wireless networks.

The Companies retain information collected for no longer than is reasonably necessary to fulfill the purposes for which the Companies collect information and to comply with the our legal obligations.

If you have any questions about the security of your personal information, please contact us at support@kabn.network.

5. Collection of Information

The Companies collect the following types of information:

Information that you provide to the Companies directly to deliver Services requested

When you use the Services to register an account with the Companies, the we will collect your email address. When you use the Services to verify your identity through the Companies, we will collect information such as ID Documents (passport, driver's license, ID card, etc...), document type, scan of the document, country, "selfie" photo, account ID, legal name, national ID number, gender, date of birth, mailing address, IP address, user name, blockchain address, email, local storage, user display settings, Google authenticators, audit logs, and device camera. When you use the Services to verify your identity, the Companies may collect information such as Social Insurance Number, credit records, telephone number, IP Address and utility bills.

Facial Biometric Identity Verification

Facial biometric identity verification is accomplished by comparing two or more captured images of faces. The biometric identifiers used to complete this assessment are taken from the images that you submit.

Information we may collect from Third Parties

the Companies may collect information about you from other sources, including third parties that help the Company verify your eligibility for the Services. This information may be combined with personal information that has been collected about you under this Privacy Policy. Please note that the information the Companies may receive from these third parties is governed by the privacy settings, policies, and/or procedures of the third parties.

6. Cookie Policy

A cookie is a small text file that is placed and stored on your computer, mobile or other devices by webpages that you visit. The Cookies collect information in an anonymous form, including the number of visitors to the webpage, how the visitor found the webpage and recent webpages visited. All cookies used by the Companies are in accordance with current regulations.

Before Cookies are placed on your device, you will be shown a pop-up requesting your consent to the Companies use of Cookies. Your consent enables the Companies to provide the best possible service to you.

If you do not consent to the use of Cookies certain features of the Service may not function as intended. You are also able to delete Cookies from your device at any time.

the Companies use cookies for language selection and other semi persistent settings for visitors who are not signed in. The Companies use an encrypted session cookie for signed in users to identify who is signed in. Any other information in the encrypted session cookie is only available to read by our servers and should be treated as server data. It could include temporary messages or errors while using the app.

The Companies may also use any of the following categories of Cookies.

1. **Essential Cookies**
The Cookies are strictly necessary for the Companies websites to function. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. These Cookies do not store any personally identifiable information.
2. **Analytics Cookies**
These Cookies track information about visits to the websites so that we can make improvements and report performance. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these Cookies collect is aggregated and anonymous.
3. **Functional or Preference Cookies**
These Cookies enable the websites to provide enhanced functionality and personalisation. They are used to remember information you have entered or choices you make (i.e.

username or language) on the the websites. They may be set by the Companies or by third party providers whose services we have added to our pages.

7. Use of Information

The Companies may use the information collected from you for the following purposes:

The Companies may use personal information to provide products, Services or information requested by you. Examples include to manage your individual information and account, help you efficiently access your information after you sign in, allow access to certain functionalities and features of the Company's Services, and respond to your inquiries.

The Companies may use personal information for the following administrative purposes:

- Verify your identity
- Process applications and transactions
- Validate your identity with third parties of your choosing and upon your direction
- Transfer your information that you choose to share with third parties upon your direction
- Measure interest in the Services
- Develop new products and Services or improve existing products and Services
- Monitor metrics such as total number of visitors, traffic, and demographic patterns applicable to the Services
- Send you Service-related emails (i.e., account verification, changes or updates to features of the Service, technical and security notice)
- Compliance with legal obligations and regulatory requirements (i.e., respond to legal process or request for information issued by government authorities)
- Prevent potentially prohibited or illegal activities
- Enforce the Terms and Conditions

8. Sharing of Information

The Companies will not rent, share, transfer or sell your information to third parties without your consent, except as noted in this Privacy Policy.

The Companies may disclose information the collected in the following circumstances or as otherwise described in this Privacy Policy:

With Vendors and Service Providers

The Companies may disclose your information to third party service providers that perform services on our behalf, such as web-hosting companies, analytics providers and information technology providers. The Companies entrusts personal information to the following types of service providers:

- Providers of IT and related services
- Customer service activities
- Fraud prevention
- Providers of services you have requested

The Companies have contracts with service providers that forbid them from using or disclosing personal information except as necessary to execute the contracted services on the our behalf or to fulfil legal obligations.

With Law Enforcement or Government Authorities

The Companies may disclose information as may be permitted or required by laws of any jurisdiction that may apply to the Companies, as provided for under contract, or as the Companies deems reasonably necessary to provide legal services. In these circumstances, the

Companies take reasonable efforts to notify you prior to disclosing information that may reasonably identify you, unless prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.

Change of Control

If the Companies sells or otherwise transfers part or the whole of the Companies or the Companies' assets to another organization (i.e., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. The buyer or transferee will have to honour the commitments the Companies have made in this Privacy Policy.

9. Transfer of Data

The Companies take all reasonable steps to ensure that the data we collect under this privacy statement is processed according to the provisions of this statement and the requirements of applicable law wherever the data is located. The Companies operate in North America, and through its Licensor, subsidiaries, affiliated KABN companies and Liquid Avatar, throughout the world and as we don't necessarily store your data in your country of origin, we do transfer personal data from your country to the European Economic Area and to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. Some of these data transfers may include a transfer between KABN entities, to third party suppliers and to cloud based storage providers.

Any transfer we make is done using a variety of legal mechanisms, including contracts, to help ensure your rights and equivalent protections travel with your data. We want to ensure that data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area or EEA (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where it is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data.

Ways in which we safeguard your data include, but are not limited to:

- a. Through the use of a transfer agreement which includes the current standard contractual clauses put in place by the European Commission for the transfer of personal data;
- b. For any transfer of data to a US based entity, we require that entity to be part of Privacy Shield which is the framework in place in the United States to safeguard data;

Other circumstances under which your data could be transferred include when it is necessary for the conclusion or performance of a contract between ourselves and a third party and the transfer is in your interest for the purposes of the contract and where you have consented to the data transfer.

10. Individual's Data Rights

This section addresses how the Companies handle requests pertaining to an individual's rights as set out in the European Union's General Data Protection Regulation (GDPR).

You may contact us at support@kabn.network to inquire about your right to view all of the personal data that the Companies have collected about you. Requests to access personal data will be answered within one month of receipt. A representative of the Companies will provide more details during correspondence.

You may contact us at support@kabn.network to request that the Companies update or fix your personal data. Requests to rectify personal information will be answered within one month of receipt. A representative of the Companies will provide more details during correspondence.

You may contact us at support@kabn.network to request that the Companies erase all of your personal data on file. The Companies are only able to provide the Services through collection, use, storage, and sharing of your personal data. Without your personal data, the Companies are unable to provide the Services requested. A request for the erasure of personal data equates to a request to

be deleted from all the Companies systems. Requests to erase personal data will be answered within one month of receipt. A representative of the Companies will provide more details during correspondence.

You may contact us at support@kabn.network to request that the Companies restrict the processing of your personal data. Requests to restrict processing will be answered within one month. A representative of the Companies will provide more details during correspondence.

You may contact us at support@kabn.network to request that the Companies export all of your personal data on file. Personal data will be exported in a commonly used format. Requests to export data will be answered within one month. A representative of the Companies will provide more details during correspondence.

11. Third Party Services and Content

The third party vendors with which the Companies share your personal information are contractually required by the Company to keep this information confidential and may generally not use such information for any purpose other than to help the Companies provide solutions to our customers.

Our Services may include integrated content or links to content provided by third parties. This Privacy Policy does not address the privacy, security, or other practice of the third parties that provide such content.

The Companies may use third party service providers to collect personal information on its behalf. These third party service providers may be located in countries where the privacy laws provide different levels of protection for personal information. If you would like more

information about the Companies use of these service providers, please contact us at support@kabn.network.

12. Retention

The Company retains personal information no longer than is necessary to fulfill the purpose(s) for which it was collected, except where you have given permission for a longer retention period or a longer period is permitted under applicable laws.

13. Updates or Changes to our Policies

The Companies may modify or update this Privacy Policy from time to time, so please review it periodically. If the Company makes any material changes in the way it collects, uses, and/or shares the personal information that you have provided, the Company will notify you by posting notice of the changes in a clear manner. Your continued use of the Services after any modification to this Privacy Policy will constitute your acceptance of such modification.

14. Your Choices and Rights

Subject to local law, you may have certain rights regarding information that the Companies have collected and that is related to you. Please contact the Companies to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate or out of date. You can also ask to see what personal information the Companies retain about you, and to erase your personal information. If you would like to exercise the rights you may have, please contact us at support@kabn.network.

Although the Companies strive to provide individuals with access to their personal information, there may be instances where the Companies may not provide access, including but not limited to: where the information would put another individual's privacy at risk, where the access would reveal confidential commercial information, or the requested information contains legal privilege. If the Companies determine that access should be limited in any specific instance, the Companies will provide an explanation of why that assessment has been made and a contact point for any further concerns.

If you no longer wish to receive marketing communications, please contact us.

15. Children's Privacy

The Companies do not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register for the Service. The Service and its content are not directed at children under the age of 13. In the event that the Companies learns that the Company has collected personal information from a child under the age of 13 without parental consent, the Companies will delete that information as quickly as possible. If you believe that the Companies might have any information from or about a child under 13, please contact the Company.

The Companies may make available the right for you as the User to add a trusted individual to your account who you may choose to grant certain rights and/or powers over your user account.

16. California Consumer Protection Act of 2018

This section of the privacy policy and notice for California residents applies solely to visitors, users, and individuals, who reside in the State of California (“consumers” or “you”).

We have adopted this notice to comply with the California Consumer Privacy Act of 2018 (CCPA).

The terms “business,” “business purpose,” “personal information,” “processing,” and “service provider” have the meanings giving to them in the CCPA.

KABN Systems NA Holdings Corp. and its subsidiary, KABN Systems North America Inc., its affiliates, subsidiaries, licenses and Liquid Avatar, (collectively “the Companies,” “we” or “us”) may collect and use consumer personal information for its commercial and business purposes and related operational purposes. With respect to these activities, the Companies may have direct responsibilities as a business subject to the CCPA. For example, for certain activities related to direct interaction with consumers who have a direct relationship with the Companies, interacting with prospective/current clients, marketing, website/web application use, engaging vendors, and interacting with visitors/users of our websites. In these cases, this privacy policy is applicable.

The Companies also collect information in its capacity as a service provider to our clients, providing ID verifications, KYC/AML (“Know Your Customer” and “Anti-Money Laundering”) services and other related financial services. In that case, the Companies receive personal information directly from individual customers and in some cases, from our clients where we have no direct relationship with the individuals whose personal information we process, and information is provided to us solely for the business purpose of providing those services.

Categories of Personal Information We Collect

The specific personal information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on the level of ID verification processed, however, the Companies never sell or disclose your personal information to third parties except to provide specific services to you. The Companies may disclose your information to third party service providers that perform services on our behalf, such as web-hosting companies, analytics providers and information technology providers. The Companies entrusts personal information to the following types of service providers:

- Providers of IT and related services
- Customer service activities
- Fraud prevention
- Providers of services you have requested

The Companies have contracts with service providers that forbid them from using or disclosing personal information except as necessary to execute the contracted services on the our behalf or to fulfil legal obligations.

In the past 12 months, we have collected and used for business purposes, personal information relating to California residents covered by this policy which may include: Category

Examples May Include

Identifiers	Name, alias, postal address, unique personal identifier, online identifier, internet protocol address (IP Address), email
	address, account name, social security number, driver’s license number, passport number, or other similar identifiers
Personal Information categories described in California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information
Protected classification characteristics under California or federal law	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information

Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Internet/network activity	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement
Geolocation data	Physical location or movements.
Professional or employment-related information	Current or past job history
Non-public education information (per the Family Educational Rights and Privacy Act)	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student financial information
Inferences drawn from other	Inferences drawn to create a profile about a consumer
personal information.	reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

Sources of Personal Information We Collect

- Information directly from you, the consumer, that you choose to provide, when you interact with us, for example, when you register for ID verification.
- Information we automatically collect when you interact with our websites, content or emails such as your IP address and the pages you visited, and when you use our services, we may

collect information on how you use those services. Please see our Section 6 of this Policy for information our use of Cookies additional information.

- Information provided by our clients in order for us to provide specific services as a service provider, or information from third parties, acquired at the direction of our clients in order to provide the services.
- Information from other sources, including service providers or publicly available sources.

Business Purposes

We collect personal information to offer and administer our services and products. These include:

- To provide the products or perform services for our clients pursuant to a written agreement, including contacting you in the course of our ordinary commercial relationship, verifying client information, or similar activities as needed to provide services for or on behalf of our clients.
- For marketing purposes. For example, we may use your information to further discuss your interest in our services and to send you information regarding KABN KASH and other such services and opportunities. You may opt-out of receiving marketing communications and updates at any time.
- To improve our communications with you. Emails sent to you by the Companies may include standard tracking, including open and click activities. The Companies may collect information about your activity as you interact with our email messages and related content in order to verify or maintain the quality of our communications, or improve, upgrade, or enhance the services we provide.
- For operating and improving our websites/web applications and your customer experience, including debugging to identify and repair errors that impair existing intended functionality or to verify or maintain the quality of our websites, and to improve, upgrade or enhance the website services. For example, we may collect and analyze data on your use of our websites and process it for the purpose of improving online user experience. Please see our Terms of Use Policy for additional information.
- For security purposes, including detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity.
- For other business purposes, which will be disclosed at the time we collect personal information.

Disclosure/Sharing of Personal Data

In the preceding 12 months, we have not sold any personal information.

We share personal information for business purposes with the following categories of third parties:

- Our affiliates, as needed to operate our business and provide services.
- Service providers, such as vendors, consultants and other service providers who perform certain services on behalf of the Companies, in which case we enter into a contract that describes the purpose of processing and requires the recipient to not use it for any purpose except performing the contract.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

Your Rights

Subject to the CCPA and other applicable laws, you have the following rights concerning your data processed by the Companies:

- Access: You have the right to request to access the personal information that the Companies hold about you, including categories of information collected, categories of sources from which the information is collected, our business purpose for collecting information, and categories of third parties with whom we share your information.
- Deletion: You can request that the Companies erase your personal data. However erasing your personal data will not allow us to further interact with you as a customer.
- Non-discrimination: The Companies will not discriminate against a consumer because the consumer exercised any of the consumer's rights under the CCPA.

17. Contact Us

If you have any questions or concerns about this Privacy Policy, please contact us at support@kabn.network.

This Privacy Policy is effective January 1, 2020 and may be changed by the Companies at any time