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Privacy Policy

COMPANY	Docree Demo Exchange Ltd
REGISTRATION	HE 000000
EFFECTIVE DATE	November 28, 2026
VERSION	v1.0

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SECTION 01

Introduction

1.1 Docree Demo Exchange (the "Company") is committed to protecting the privacy of its users. This Privacy Policy describes how we collect, use, disclose, and safeguard your personal information when you access our cryptocurrency trading and custody services.

1.2 We process personal data in compliance with applicable data protection laws and regulations. If you do not agree with this Policy, please do not use our services.

SECTION 02

Data We Collect

2.1 We collect the following categories of personal data:

- Identity data: full name, date of birth, nationality, photo ID, proof of address.
- Contact data: email address, phone number, mailing address.
- Financial data: bank account details, card numbers (tokenized), source of funds.
- On-chain data: deposit/withdrawal wallet addresses, transaction hashes.
- Technical data: IP address, device fingerprint, browser type, OS, cookies.
- Usage data: trading history, login times, API activity, support tickets.
- Biometric data: facial recognition during KYC verification (where applicable).

SECTION 03

How We Use Your Data

- To verify your identity and comply with KYC/AML regulations.
- To execute and settle trades, deposits, and withdrawals.
- To monitor for fraud, market abuse, and sanctions violations.
- To provide customer support and respond to inquiries.
- To send service notifications and, with consent, marketing communications.
- To improve the platform's security, performance, and user experience.
- To comply with legal obligations, court orders, and regulatory requests.

SECTION 04

Legal Basis for Processing

4.1 We process your personal data on the following legal grounds:

Contract performance

To provide the services you have requested.

Legal obligation

KYC/AML, tax reporting, sanctions screening, regulatory reporting.

Legitimate interest

Fraud prevention, platform security, service improvement.

Consent

Marketing communications, optional analytics cookies.

SECTION 05

Data Sharing & Disclosure

5.1 We may share your data with the following categories of third parties:

- KYC providers: For identity verification and document authentication.
- Banking partners: To process fiat deposits and withdrawals.
- Blockchain analytics firms: To screen wallet addresses for illicit activity.
- Cloud infrastructure providers: AWS, Google Cloud, or equivalent for hosting.
- Regulators and law enforcement: When required by law, court order, or subpoena.
- Auditors and legal counsel: Under strict confidentiality obligations.

5.2 We do not sell your personal data to third parties for marketing purposes.

SECTION 06

Blockchain Data & Transparency

6.1 Cryptocurrency transactions are recorded on public blockchains. The Company cannot delete, modify, or anonymize on-chain transaction records. Withdrawal destinations you submit to the

Company may be linked to your account for compliance purposes.

6.2 Wallet addresses you use may be screened against blockchain analytics databases to detect association with sanctions, ransomware, darknet markets, or other high-risk activity.

SECTION 07

Data Retention

7.1 We retain your personal data for as long as your account is active, and for a minimum of seven (7) years after account closure, to comply with regulatory record-keeping obligations. Some data may be retained longer where required by tax law or ongoing investigations.

SECTION 08

Your Rights

8.1 Subject to applicable law, you have the right to:

- Access the personal data we hold about you.
- Rectify inaccurate or incomplete data.
- Request erasure of data (subject to legal retention requirements).
- Restrict or object to processing in certain circumstances.
- Data portability — receive your data in a machine-readable format.
- Withdraw consent where processing is based on consent.
- Lodge a complaint with a data protection supervisory authority.

8.2 To exercise your rights, contact our Data Protection Officer at dpo@docree.com.

SECTION 09

International Transfers & Security

9.1 Your data may be transferred to and processed in countries outside your jurisdiction. Where such transfers occur, we implement appropriate safeguards (Standard Contractual Clauses, adequacy decisions) to protect your data.

9.2 We implement industry-standard security measures including encryption in transit and at rest, multi-factor authentication, intrusion detection, and regular security audits. However, no system

is completely secure, and you use the platform at your own risk.

Document	Privacy Policy
Company	Docree Demo Exchange Ltd
Effective Date	November 28, 2026
DPO Contact	dpo@docree.com

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