

PRIVACY POLICY

INTRODUCTION

Welcome to Gomining Pte LTD privacy notice.

Gomining Pte LTD respects your privacy and is committed to protect your personal data. This privacy notice informs you about how we care about your personal information when you:

- visit our website <https://gmt.io> or its subdomains (collectively “Website”)
- complete surveys and subscribe for the newsletters, communicate with our team (“Voluntary provision of data”); and/or use our services and tell you about your privacy rights and how the law protects you.

IMPORTANT INFORMATION AND WHO WE ARE

1. Purpose of this privacy notice

This privacy notice aims to give you information on how Gomining Pte LTD collects and processes your personal data through your use of the Website and/or Services and/or Voluntary provision of data, including any data you may provide and/or we may collect through your use of the Website, the Services and/or when you sign up to our newsletters, complete our surveys and/or communicate with our support service. It is important that you read this privacy notice in conjunction with any other privacy or fair handling notice that we may provide in certain cases where we collect or process personal data about you, so that you are fully aware of how and why we use your data. This privacy notice is in addition to the other notices and is not intended to cancel them Gomining Pte LTD is responsible for your personal data (collectively referred to as “we”, “us” or “our” in this privacy notice). Our office is situated at: 176 JOO CHIAT ROAD #02-02 SINGAPORE (427447)

2. Changes to the privacy notice and your duty to inform us about them

This version was last updated on **01/12/2021**.

We may update this Privacy policy from time to time. The updated version will be indicated by the date of the last update above. If we make material changes to this privacy policy, we may notify you by posting a notice on the website and / or the Services, or by sending a notice directly to you. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

3. The data we collect about you

Personal data or personal information means any information about a person by which that person can be identified. It does not include data whose identity has been deleted (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows.

The information you provide to us: This is your personal information that you provide to us by filling out forms and all KYC information. We may receive information from you

by correspondence with you by mail, phone, e-mail, on the website gmt.io. This includes personal data that you enter on our website, provide to us through Services or through Voluntary Provision of Data, or provide to us in any other way. You provide such information when you:

- use our Website and Services
- fill out KYC forms and requests
- subscribe to our newsletters
- fill out a survey
- participate (register) in any competition, promotional activities, prize draws, events, educational, career, partnership or consulting offers
- communicate with our support service, give us feedback (for example, when you communicate with us by customer support form, e-mail, phone, mail or otherwise).

As a result of these actions, you can provide us with information such as proof of identity in the form of a photo (which will be in the form of a "selfie" in an approved format); date and place of birth (if you are an individual) or date and place of registration or registration (if you are a legal entity) (using gmt.io, you agree not to hide your real location. You agree not to use a VPN, proxy, Tor browser or other methods of hiding your real location); primary citizenship; email address; residential address; confirmation of the current residential address or confirmation of the current address of a registered legal entity (for example, a bank statement, electricity or water bill issued within the last three months), phone number, information about your wallet(s) and crypto tokens that you have, the nature of the origin of tokens or the origin of funds for the purchase of tokens and other data. Data for KYC is provided by contractors providing services in the financial sector. All users are checked for compliance with KYC/CFT. If you do not pass the KYC/CFT check, you will be refused to work with gmt.io.

Automatic Collection of Information: we receive and store certain types of information automatically whenever you interact with us. As you interact with our Website and/or Services, we may automatically collect technical data about your equipment, browser features, browsing actions and patterns. For example, like many websites, at the Website and Services we use "cookies" and other similar tools and identifiers for analytics and marketing (like web beacons and pixels), and we obtain certain types of information when you access our Website and/or our Services (access log records such as date, IP address, user agent). However, aggregated data is not considered personal data, as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

Information from Other Sources: we might receive information about you from other sources (such as public databases, marketing partners and other third parties) and add it to our account information (this concerns technical data from the following parties: analytics providers such as Google; advertising networks; and search information providers). We will inform you about the source of information and the type of information we have collected about you within a reasonable period after obtaining the personal data, but at the latest within a month.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orien-

tation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

4. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Your consent.** We may process your data when you consented for the use of such data by us
- **Legitimate Interests.** We may process your data where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override them. For instance, for provision of Website and Services to you, for the development of business, to procure compliance with our terms and policies. We can also conduct KYC of each user to counter money laundering and terrorist financing
- **Legal obligation.** Where we need to comply with a legal or regulatory obligation (for example, comply with applicable AML/CFT legislation, government requests, FATF requirements, a judicial proceeding, court order, legal process, enforcement requirements). We may also disclose your information where it is necessary to investigate, prevent or take action regarding potential or suspected fraud, illegal activities, situations involving potential threats to safety. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We are responsible for verifying your identity. For its internal purposes, we have identified all persons (whether an individual or a legal entity) with whom we:

- (a) establishes or intends to establish business relations with;
- (b) undertakes or intends to make any transaction in GMT.

We undertake to take reasonable measures to verify the identity of the beneficial owners of legal entity, including the main investors and/or controllers of the legal entity, or, if the legal entity is a fund, a party that acts as a fund manager.

5. **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for a reason compatible with the original purpose. If we need to use your personal data for a purpose not related to the purposes stipulated here, we will notify you and we will explain the legal basis which allows us to do so.

6. **Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

6.1. **Third-Party Service Providers**

We may share your data with third-party vendors, service providers, contractors or agents who provide services for us or on our behalf and who require access to such information to perform such work (for example, for the development and technical support and maintenance of the Website and Services, organization of data storage and processing, data analysis, email delivery, hosting services, customer service, KYC ser-

vices).

6.2. **Business Transfers**

Third parties to whom we may sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If there are changes in our business, the new owners may use your personal data in the same way as indicated in this privacy notice. Branches. We may share your information with our affiliates (including parties that we control, control, or share control with us). We require all third parties to respect the security of your personal data and to treat them in accordance with the law and this Privacy Policy. We do not allow our third-party service providers to use your personal data for their own purposes, share it with third parties and allow them to process your personal data only for certain purposes and in accordance with our instructions.

7. **International transfers**

Please note that your information may be transferred, stored and processed by us and by those third parties with whom we may share your information in various countries, including outside Singapore. These countries may have less stringent privacy laws than we do, so any information they hold can become subject to their laws and disclosure requirements, including disclosure to governmental bodies, regulatory agencies and private persons. In addition, a number of countries have agreements under which information is exchanged with other countries for law enforcement, tax and other purposes. We will however take all necessary measures to protect your personal information in accordance with this Privacy policy and applicable law and require all our contractors to follow the same rules when processing your personal data.

8. **Data security**

We have put in place appropriate technical and organizational security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. However, please remember that the transmission of data over the Internet (including e-mail) is never completely secure. Therefore, while we use appropriate measures to try to protect your personal data, we cannot guarantee the security of the data transmitted to us or by us. You must access the Website and Services and / or otherwise transmit your data in a secure environment.

9. **Data retention**

We will only retain your personal data for as long as is necessary to achieve the purposes for which we collected it, unless a longer retention period is required or permitted by law (for example, any legal, accounting or reporting requirements).

When we do not have an ongoing legitimate business need to process your personal information, we will either delete it or anonymize it, or, if this is not possible (for example, if your data is stored in backup systems), we will securely store it until it is deleted. If in some circumstances we anonymize your personal data (so that they can no longer be associated with you) for research or statistical purposes, in which case we may use this

information indefinitely without further notice.

10. **Your legal rights**

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- request access to your personal data
- request correction of your personal data
- request erasure of your personal data
- object to or restrict processing of your personal data
- request restriction of processing your personal data
- request transfer of your personal data (data portability)
- right to withdraw consent&

If we are relying on your consent to process your personal data you have the right to withdraw your consent at any time. 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 you with certain services. We will inform you about it when you withdraw your consent. Please note that under certain circumstances it may be lawful for us to continue processing your information even if you have withdrawn your consent if one of the other legal grounds applies.

No fee usually required. You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

11. **Third-party links**

The Website, Services and means of Voluntary provision of data may include links to third-party websites and services, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and services and are not responsible for their privacy statements. When you leave the Website and/or Services and/or use means of Voluntary provision of data ran/built on or hosted by third-party services, we encourage you to read the privacy notice of every third-party website and service you visit.

12. **Cookies**

We may use cookies and similar tracking technologies (like web beacons and pixels) to access and store information. You can set your browser to refuse all or some browser cookies, or to alert you when the Website or Services set or access cookies. If you disable or refuse cookies, please note that some parts of the Website or Services may become inaccessible or not function properly.

13. **Contact us**

If you have questions or comments about this Privacy Policy or the handling of your personal data by us, email us at: info@gmt.io