

VaultLink, Inc.

Privacy Statement

Effective Date: 18-Jan-2024

1. Introduction

VaultLink is a SaaS solution enabling banks to provide digital asset services in a regulatory-compliant manner.

We understand that you are aware of and care about your own personal privacy interests, and we take that seriously. This Privacy Notice describes VaultLink's policies and practices regarding its collection and use of your personal data, and sets forth your privacy rights. We recognize that information privacy is an ongoing responsibility, and so we will from time to time update this Privacy Notice as we undertake new personal data practices or adopt new privacy policies.

2. Data Protection Officer

VaultLink is headquartered in Wilmington, DE in the United States. VaultLink has appointed an internal data protection officer for you to contact if you have any questions or concerns about VaultLink's personal data policies or practices. If you would like to exercise your privacy rights, please direct your query to VaultLink's data protection officer. VaultLink's data protection officer's name and contact information are as follows:

Jason Price

VaultLink, Inc.

1209 Orange St. Wilmington New Castle, DE, 19801

compliance@vault.link

833-VLT-LINK

3. How We Collect and Use (process) Your Personal Information

VaultLink collects personal information about its website visitors and customers. With a few exceptions, this information is generally limited to:

- name
- job title
- employer name

- work address
- work email
- work phone number

We use this information to provide prospects and customers with services.

We do not sell personal information to anyone and only share it with third parties who are facilitating the delivery of our services.

From time to time, VaultLink receives personal information about individuals from third parties. Typically, information collected from third parties will include further details on your employer or industry. We may also collect your personal data from a third party website (e.g. LinkedIn)

4. Use of VaultLink's Website

As is true of most other websites, VaultLink's website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of VaultLink's website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences.

VaultLink has a legitimate interest in understanding how members, customers and potential customers use its website. This assists VaultLink with providing more relevant products and services, with communicating value to our sponsors and corporate members, and with providing appropriate staffing to meet member and customer needs.

5. Cookies and Tracking Technologies

VaultLink makes available a comprehensive notice that describes the cookies and tracking technologies used on VaultLink's website and provides information on how users can accept or reject them. To view the notice, see below:

We use cookies to enhance your experience on our website. Cookies help us personalize content and ads, provide social media features, and analyze our traffic. We also share information about your use of our site with our social media, advertising, and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services. By continuing to use our site, you consent to our use of cookies.

6. Sharing Information with Third Parties

The personal information VaultLink collects from you is stored in one or more databases hosted by third parties located in the United States. These third parties do not use or have access to your personal information for any purpose other than cloud storage and retrieval. On occasion, VaultLink engages third parties to send information to you, including information about our products, services, and events.

We do not otherwise reveal your personal data to non-company persons or businesses for their independent use unless: (1) you request or authorize it; (2) it's in connection with VaultLink-hosted and VaultLink co-sponsored conferences as described above; (3) the information is provided to comply with the law (for example, compelled by law enforcement to comply with a search warrant, subpoena, or court order), enforce an agreement we have with you, or to protect our rights, property or safety, or the rights, property or safety of our employees or others; (4) the information is provided to our agents, vendors or service providers who perform functions on our behalf; (5) to address emergencies or acts of God; or (6) to address disputes, claims, or to persons demonstrating legal authority to act on your behalf. We may also gather aggregated data about our services and website visitors and disclose the results of such aggregated (but not personally identifiable) information to our partners, service providers, advertisers, and/or other third parties for marketing or promotional purposes.

The VaultLink website connects with third party services such as Facebook, LinkedIn, Twitter and others. If you choose to share information from the VaultLink website through these services, you should review the privacy policy of that service. If you are a member of a third party service, the aforementioned connections may allow that service to connect your visit to our site to your personal data.

7. Transferring Personal Data to the U.S.

VaultLink has its headquarters in the United States. Information we collect about you will be processed in the United States. By using VaultLink's services, you acknowledge that your personal information will be processed in the United States. The United States has not sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR. Pursuant to Article 46 of the GDPR, VaultLink is providing for appropriate safeguards by entering binding, standard data protection clauses, enforceable by data subjects in the EEA and the UK. These clauses have been enhanced based on the guidance of the European Data Protection Board and will be updated when the new draft model clauses are approved.

Depending on the circumstance, VaultLink also collects and transfers to the U.S. personal data with consent; to perform a contract with you; or to fulfill a compelling legitimate interest of VaultLink in a manner that does not outweigh your rights and freedoms. VaultLink endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with VaultLink and the practices described in this Privacy Statement. VaultLink also enters into data processing agreements and model clauses with its vendors whenever feasible and appropriate. Since it was founded, VaultLink has received zero government requests for information.

For more information or if you have any questions, please contact us at compliance@vault.link

8. Data Subject Rights

This Privacy Notice is intended to provide you with information about what personal data VaultLink collects about you and how it is used.

If you wish to confirm that VaultLink is processing your personal data, or to have access to the personal data VaultLink may have about you, please contact us.

You may also request information about: the purpose of the processing; the categories of personal data concerned; who else outside VaultLink might have received the data from VaultLink; what the source of the information was (if you didn't provide it directly to VaultLink); and how long it will be stored. You have a right to correct (rectify) the record of your personal data maintained by VaultLink if it is inaccurate. You may request that VaultLink erase that data or cease processing it, subject to certain exceptions. You may also request that VaultLink cease using your data for direct marketing purposes. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how VaultLink processes your personal data. When technically feasible, VaultLink will—at your request—provide your personal data to you.

Reasonable access to your personal data will be provided at no cost. If access cannot be provided within a reasonable time frame, VaultLink will provide you with a date when the information will be provided. If for some reason access is denied, VaultLink will provide an explanation as to why access has been denied.

For questions or complaints concerning the processing of your personal data, you can email us at compliance@vault.link.

9. Data Storage and Retention

Your personal data is stored by VaultLink on its servers, and on the servers of the cloud-based database management services VaultLink engages, located in the United States. VaultLink retains service data for the duration of the customer's business relationship with VaultLink and for a period of time thereafter, to analyze the data for VaultLink's own operations, and for historical and archiving purposes associated with VaultLink's services. VaultLink retains prospect data until such time as it no longer has business value and is purged from VaultLink systems. All personal data that VaultLink controls may be deleted upon verified request from Data Subjects or their authorized agents. For more information on where and how long your personal data is stored, and for more information on your rights of erasure and portability, please contact us at: compliance@vault.link

10. Children's Data

We do not knowingly attempt to solicit or receive information from children.

11. Questions, Concerns, or Complaints

If you have questions, concerns, complaints, or would like to exercise your rights, please contact us at:

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