

COOKIES POLICY

Effective Date: March 16, 2026

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Introduction

This Cookies Policy ("Cookies Policy") explains how Pure Digital Exchange LLC ("Pure Digital Exchange," "we," "us," or "our") uses cookies and similar tracking technologies when you access or use our website, mobile application(s), and related digital platforms (collectively, the "Site") and the products and services we offer through the Site (collectively, the "Services").

This Cookies Policy forms part of our policy suite and should be read together with our Privacy Policy and Terms of Use, both of which are available on our Site. Capitalized terms used but not defined in this Cookies Policy have the meanings given to them in our Privacy Policy or Terms of Use, as applicable.

By continuing to access or use our Site, you acknowledge that you have read and understood this Cookies Policy. Where your consent is required under applicable law, we will seek it through our cookie consent management tool before placing non-essential cookies on your device. You may withdraw or adjust your consent at any time.

1. Who We Are

Pure Digital Exchange LLC is a limited liability company registered in the State of Delaware, with its registered address at c/o Harvard Business Services, Inc., 16192 Coastal Hwy, Lewes, DE 19958. Pure Digital Exchange operates a proprietary software platform and related digital financial services infrastructure.

For the purposes of this Cookies Policy, Pure Digital Exchange is the entity responsible for the cookies and similar technologies deployed on the Site.

If you have any questions about this Cookies Policy or our use of cookies, please contact us using the details set out in Section 16.

2. What Are Cookies and Similar Technologies?

Cookies are small text files containing letters and numbers that are placed on your browser or the hard drive of your device when you visit a website. Cookies allow a website to recognize your device and remember certain information about your visit, such as your preferences and settings.

In addition to cookies, we and our third-party partners may use other tracking and data collection technologies on the Site, including:

- Pixels and web beacons: Small transparent image files or code snippets embedded in web pages or emails that allow us or our partners to detect when a page has been viewed or an email has been opened, and to collect information such as your IP address, browser type, and the time of the interaction;
- Tags and scripts: Snippets of code embedded in our Site that enable the collection of data about your interactions with the Site and facilitate the delivery of certain features and services;
- Software Development Kits (SDKs): Code libraries integrated into our mobile application(s) that enable the collection of usage data and support the delivery of analytics, security, and other functional capabilities;
- Local storage and similar technologies: Browser-based storage mechanisms (such as HTML5 local storage and IndexedDB) that allow data to be stored on your device and retrieved during subsequent visits; and
- Session replay and heatmap tools: Technologies that record or reconstruct user interactions with the Site for the purpose of improving usability and user experience, where deployed.

References to "cookies" in this Cookies Policy include all of the above technologies unless the context requires otherwise.

3. Cookie Duration: Session and Persistent Cookies

Cookies may be classified by their duration as follows:

Session cookies: Session cookies are temporary and exist only for the duration of your browser session. They are automatically deleted from your device when you close your browser. Session cookies are used, for example, to maintain your authenticated state as you navigate between pages of the Site during a single visit.

Persistent cookies: Persistent cookies remain on your device after your browser session ends, until they expire or are deleted by you. Persistent cookies are used, for example, to remember your preferences and settings across multiple visits, and to support analytics and advertising functions. The retention periods applicable to persistent cookies are described in this Cookies Policy.

4. Categories of Cookies We Use

We use the following categories of cookies and similar technologies on our Site:

4.1 Strictly Necessary Cookies

Strictly necessary cookies are essential for the operation of our Site and Services. They enable core functionality such as user authentication, account security, session

management, fraud prevention, and access to secure areas of the Platform. Without these cookies, the Site cannot function properly and certain Services cannot be delivered. Strictly necessary cookies do not require your consent and cannot be disabled through our cookie preference center, though you may disable them through your browser settings.

4.2 Functional Cookies

Functional cookies allow us to remember choices you make and to provide enhanced, personalized features. For example, functional cookies may be used to remember your language preferences, display settings, or previously entered information, so that you do not need to re-enter it on each visit. These cookies may be set by us or by third-party providers whose services we have incorporated into the Site. Where required by applicable law, we will seek your consent before placing functional cookies.

4.3 Analytics and Performance Cookies

Analytics and performance cookies collect information about how visitors use our Site, including which pages are visited most frequently, how users navigate between pages, and whether users encounter error messages. This information is used in aggregate form to help us understand usage patterns, improve the performance and design of the Site, and develop new features and Services. These cookies do not collect information that directly identifies you. Where required by applicable law, we will seek your consent before placing analytics cookies.

4.4 Advertising and Targeting Cookies

Advertising and targeting cookies record your visits to our Site, the pages you have viewed, and the links you have followed. We and our marketing and advertising partners may use this information to deliver advertisements that are more relevant to your interests, to limit the number of times you see an advertisement, and to measure the effectiveness of our advertising campaigns. These cookies may also be used to build a profile of your interests and to show you relevant advertising on other websites. Where required by applicable law, we will seek your consent before placing advertising or targeting cookies.

4.5 Third-Party Cookies

In addition to cookies set directly by Pure Digital Exchange, certain third-party service providers — including analytics providers, advertising networks, social media platforms, and embedded content providers — may set their own cookies on your device when you access our Site. These third-party cookies are governed by the privacy and cookie policies of the respective third parties. We do not have direct

control over the information collected by third-party cookies. Please refer to Section 6 for further information on third-party cookies and how to manage them.

5. Why We Use Cookies and Similar Technologies

We and our third-party partners use cookies and similar technologies for the following purposes:

- To operate and deliver the Services, including authenticating users, maintaining session integrity, and enabling secure access to the Platform;
- To remember your preferences and settings, and to personalize your experience on the Site;
- To monitor and analyze trends, usage patterns, and activities in connection with the Site and Services, and to improve their performance, design, and functionality;
- To support our security and fraud prevention measures, including detecting and investigating unauthorized access, suspicious activity, and financial crime;
- To deliver interest-based advertising and to measure the effectiveness of our marketing campaigns, in accordance with applicable law and your preferences;
- To gather aggregate demographic information about our user base and to generate de-identified or aggregated datasets for analytical and service improvement purposes; and
- To comply with our legal and regulatory obligations as a registered MSB, including recordkeeping and audit requirements.

Subject to applicable law — which may require your consent depending on your jurisdiction of residence — we and our service providers and advertising partners use cookies and similar technologies to analyze trends, administer our Services, monitor usage, and gather aggregate demographic information about our user base. We may receive reports based on this activity on both an individual and aggregated basis.

6. How Third Parties May Use Cookies Through Our Site

We work with third-party service providers and partners — including analytics providers, advertising networks, and marketing partners — who may use cookies and pixel tags to collect information about your activities on our Site and on other websites, in order to deliver interest-based advertising or to help us measure the effectiveness of our advertising and marketing activities.

Our third-party partners may also use cookies to gather statistical data, such as frequently visited pages, downloaded content, and referring URLs. We may receive reports based on this activity on both an individual and aggregated basis.

Third-party cookies are subject to the privacy and cookie policies of the respective third parties. We encourage you to review those policies before interacting with third-

party features on our Site. We do not control the information collected by third-party cookies and are not responsible for the practices of third-party providers.

Where we engage third-party service providers to assist with the collection of information through cookies or similar technologies on our behalf, we require those providers to handle such information in a manner consistent with this Cookies Policy and applicable law.

7. Analytics Tools

Our Site uses Google Analytics, a web analytics service provided by Google LLC ("Google"), which uses cookies and similar technologies to collect and analyze information about how visitors use the Site. This service may also collect information regarding the use of other websites, applications, and online resources.

The information generated by analytics cookies about your use of the Site (including, where applicable, your IP address) is transmitted to and stored by the analytics provider on servers that may be located outside your country of residence. The analytics provider uses this information to evaluate your use of the Site, compile reports on Site activity, and provide other services relating to Site activity and internet usage.

Where IP anonymization is enabled, your IP address will be truncated prior to storage or further processing. The analytics provider will not associate your IP address with any other data held by it.

Analytics cookies are used only where you have provided your consent, to the extent required by applicable law. You may opt out of analytics tracking at any time through our cookie preference center or by using the opt-out tools provided by the relevant analytics provider.

8. Your Cookie Choices and Controls

8.1 Cookie Consent Banner and Preference Center

When you first visit our Site, you will be presented with a cookie consent banner that allows you to accept, reject, or customize the use of non-essential cookies. Strictly necessary cookies are deployed without your consent, as they are required for the operation of the Site and Services.

You may change or withdraw your consent at any time by accessing our cookie preference center, available via the "Cookie Settings" link on our Site. Please note that changes to your cookie preferences may take a short period of time to take effect.

8.2 Browser Settings

Most web browsers allow you to manage cookies through your browser settings. You can typically configure your browser to refuse all cookies, accept only certain types of cookies, or to notify you when a cookie is being placed on your device. The "Help" function of your browser will provide guidance on how to manage cookie settings.

Please note that if you configure your browser to block all cookies — including strictly necessary cookies — you may not be able to access all or parts of the Site, and certain features of the Services may not function correctly.

8.3 Third-Party Opt-Out Tools

You may also opt out of certain third-party cookies through the opt-out mechanisms provided by the relevant third parties. For example:

- To opt out of Google Analytics, you may download and install the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>;
- To opt out of interest-based advertising from participating companies, you may use the opt-out tools provided by the Digital Advertising Alliance (DAA) at www.aboutads.info/choices or the Network Advertising Initiative (NAI) at www.networkadvertising.org/choices; and

Please note that opting out through third-party tools does not prevent all data collection; it may only prevent the use of your data for interest-based advertising purposes.

8.4 Do Not Track and Global Privacy Signals

Our Site does not currently respond to browser-level "Do Not Track" signals. We honor global privacy signals (such as the Global Privacy Control) to the extent required by applicable law.

9. Consequences of Refusing or Disabling Cookies

You are not required to accept cookies in order to visit our Site. However, please be aware that disabling certain cookies may affect your ability to access or use certain features of the Site and Services. In particular:

- Disabling strictly necessary cookies may prevent you from logging in to your account, accessing secure areas of the Platform, or using core features of the Services;
- Disabling functional cookies may result in the loss of your saved preferences and settings, requiring you to re-enter information on each visit; and

- Disabling analytics or advertising cookies will not prevent you from using the Services, but will limit our ability to improve the Site based on usage data and to deliver advertising that is relevant to your interests.

We recommend that you do not disable strictly necessary cookies, as doing so may materially impair the functionality of the Site and your ability to use the Services.

10. Retention Periods

The retention period of a cookie depends on its type and purpose:

- Session cookies are deleted automatically when you close your browser and do not persist beyond your current browsing session.
- Persistent cookies remain on your device for a defined period, which varies depending on the cookie's purpose and the entity that set it. Persistent cookies may remain on your device for periods ranging from a few days to several years, depending on their function.

Personal data collected through cookies is retained in accordance with our Privacy Policy. We retain such data for as long as necessary to fulfill the purposes described in this Cookies Policy, or as required by applicable law. Where we are required to retain certain records under our MSB regulatory obligations — including under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) in Canada and the Bank Secrecy Act (BSA) in the United States — those retention periods will apply notwithstanding any cookie preference you may have set.

11. Cookie Category Summary Table

The table below provides a summary of the categories of cookies we use, their purposes, and whether your consent is required.

Category of Cookie	Purpose / Why We Use It	Consent Required?
Strictly Necessary	Essential for the operation of the Site and Services, including user authentication, session management, account security, and fraud prevention. These cookies cannot be disabled through our preference center.	No — deployed on the basis of our legitimate interests and legal obligations as an MSB.
Functional	Enable enhanced functionality and personalization, including remembering your	Yes — where required by applicable law.

	preferences, language settings, and previously entered information.	
Analytics / Performance	Collect aggregate information about how visitors use the Site, including pages visited, navigation paths, and error encounters, to improve Site performance and user experience.	Yes — where required by applicable law.
Advertising / Targeting	Record your visits to the Site and your interactions with content and links, to deliver interest-based advertising and to measure the effectiveness of marketing campaigns.	Yes — where required by applicable law.
Third-Party	Set by third-party providers (including analytics, advertising, and social media partners) to collect information about your activities on our Site and other websites. Subject to the privacy policies of the relevant third parties.	Yes — where required by applicable law.

12. Legal Basis for Processing Personal Data Through Cookies

To the extent that cookies or similar technologies result in the processing of personal data, we rely on the following legal bases, depending on the type of cookie and the jurisdiction in which you are located:

- **Contractual Necessity:** Where the processing is necessary to perform our obligations under an agreement with you or to provide the Services you have requested, including the deployment of strictly necessary cookies that enable authentication and secure access to the Platform;
- **Legitimate Interests:** Where the processing serves our legitimate interests or those of third parties — such as maintaining the security of our Services, preventing fraud and financial crime, and improving the performance and functionality of the Site — and those interests are not overridden by your rights and interests;

- Legal Obligation: Where the processing is required to comply with applicable laws and regulations, including our AML/CTF recordkeeping and reporting obligations as a registered MSB; and
- Consent: Where you have provided your consent to the placement of non-essential cookies through our cookie consent banner or preference center. You may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of any processing carried out prior to withdrawal.

The applicable legal basis may vary depending on your jurisdiction of residence. Where consent standards differ by jurisdiction, we apply the standard required by applicable law in your jurisdiction.

13. Links to Third-Party Websites and Features

Our Site may contain links to, or integrate features from, third-party websites or services that are not owned or operated by Pure Digital Exchange. This Cookies Policy applies only to our Site and does not extend to any third-party websites or services. We do not control the privacy or security practices of third parties, nor the cookies or tracking technologies they deploy.

We encourage you to review the cookie and privacy policies of any third-party websites or services you access through links on our Site, as their practices may differ materially from ours. Pure Digital Exchange is not responsible for the content, accuracy, or privacy practices of any third-party website or service.

14. Cross-Border Processing

Pure Digital Exchange is incorporated in Delaware, United States, and operates in both the United States and Canada. Information collected through cookies and similar technologies on our Site may be transferred to, stored in, accessed from, or processed in the United States, Canada, and other jurisdictions where we or our third-party service providers maintain operations or infrastructure.

The data protection laws of these jurisdictions may differ from, and may not provide the same level of protection as, the laws of your home jurisdiction. Where personal data collected through cookies is transferred internationally, we take reasonable steps to ensure it is protected in a manner consistent with this Cookies Policy, our Privacy Policy, and applicable law. Such measures may include contractual protections, data processing agreements, or other mechanisms recognized under applicable law.

By using our Site, you acknowledge that information collected through cookies may be transferred to and processed in jurisdictions outside your country of residence.

15. Changes to This Cookies Policy

We may update this Cookies Policy from time to time to reflect changes in the cookies and similar technologies we use, changes in applicable law, or other operational or business developments. Any changes will become effective upon posting to our Site, as indicated by the updated date at the top of this Cookies Policy.

If we make material changes to this Cookies Policy, we will notify you through our Site or, where you have a registered account with us, using the contact information you have provided, or through other means consistent with applicable legal requirements. We encourage you to review this Cookies Policy periodically to stay informed about our use of cookies.

Your continued use of the Site following the posting of any changes to this Cookies Policy constitutes your acknowledgment of those changes.

16. Contact Us

If you have any questions, concerns, or requests regarding this Cookies Policy or our use of cookies and similar technologies, please contact us at:

Pure Digital Exchange LLC
c/o Harvard Business Services, Inc.
16192 Coastal Hwy, Lewes, DE 19958
Email: contact@puredigital.solutions

Website: www.puredigital.solutions

You may also have the right to lodge a complaint with the applicable privacy or data protection authority in your jurisdiction:

- Canada: Office of the Privacy Commissioner of Canada (OPC) — www.priv.gc.ca
- United States: Relevant state attorney general or consumer protection agency for your state of residence