

Privacy Policy

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Privacy and the security of your personal information are fundamental priorities at **Pure Digital Exchange LLC**. This Privacy Policy ("Policy") is designed to help you understand how we collect, use, and share your personal information when you use our products or services.

Pure Digital Exchange LLC ("Pure Digital Exchange," "we," "us," or "our") is a limited liability company registered in the State of Delaware. This Policy applies to the websites, mobile applications, and other digital platforms operated by Pure Digital Exchange (collectively, the "Site") — as well as all related products and services we offer (collectively, the "Services"), and governs our handling of personal information collected through those channels and your interactions with us.

Please read this Policy carefully. It contains important information about your privacy rights and choices. If you do not agree with this Policy, please do not access or use our Services.

Pure Digital Exchange obtains personal information about you from various sources. "You" may be a visitor to our Site, a registered user or customer of Pure Digital Exchange ("PDE Client"), an end user of a PDE Client ("End Customer"), or a recipient or beneficiary of one of our Services. If you are an End Customer, your use of the Services is also subject to the applicable agreement between Pure Digital Exchange and the relevant PDE Client.

1. Information We Collect

The personal information we collect about you depends on how you use our Services, the choices you make, your location, and applicable law.

1.1 Information You Provide to Us Directly

We collect information directly from you when you access or use our Site and/or Services, including:

- **Identifiers**, such as your full name, residential address, email address, telephone number, date of birth, gender, citizenship or nationality, account credentials, geolocation data, unique device identifiers, network information, and Internet Protocol (IP) address;
- **Government-Issued Identification**, including national identity card details, driver's license, state or provincial identification, passport, visa, Social Insurance Number (SIN) or Social Security Number (SSN), tax identification numbers, and similar government-issued identifiers — collected as required for identity verification and regulatory compliance;

- **Employment and Occupation Information**, including your occupation, employer name, and income or salary range;
- **Business or Company Information**, including your company name, business address, and related organizational details, where applicable;
- **Payment and Transaction Information**, including records of your payment transactions, transaction history, and related details in connection with the Services;
- **Financial Account Information**, including your bank name, account number, routing or transit number, and payment card details;
- **Identity Verification and KYC Information**, including images of government-issued identification documents, selfie or liveness-check images, proof of address documentation, and other information required to verify your identity, assess risk, and fulfill our obligations under applicable anti-money laundering ("AML"), know-your-customer ("KYC"), and sanctions compliance requirements;
- **Sensitive Personal Information**, including government identification numbers (e.g., driver's license, passport, or state/provincial ID number), and financial account credentials (e.g., account login, financial account number, debit or credit card number combined with any required security code, password, or access credentials); and
- **Other information** you voluntarily provide to us in connection with the Services, or that we may collect as permitted by applicable law and with your consent where required.

If you do not provide certain information, we may be unable to provide the Services to you, or your access to the Services may be limited or restricted.

In addition to information provided in connection with your use of the Services, you may also submit information to us through other channels, including in response to marketing or other communications, through social media or online forums, in connection with a promotion or program, in the context of an actual or potential business relationship, or through interactions at industry events or conferences.

1.2 Information We Collect Automatically

We may automatically collect certain information when you access or use our Site or Services. This includes information about the device you use to access the Services, such as your IP address, general geographic location, browser type and version, device identifiers, operating system, and Internet service provider. We may also collect information about your activity on our Site, including pages visited before, during, and after your session, links clicked, content types interacted with, frequency and duration of use, and other usage data.

We may engage third-party service providers to assist with such collection activities on our behalf.

We also work with third-party partners to manage advertising on other platforms and to evaluate the overall performance of our Services.

Subject to applicable law — which may require your consent depending on your jurisdiction of residence — we and our service providers and advertising partners use technologies such as cookies, web beacons, tags, scripts, and similar tracking 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.

Our third-party partners may also use cookies and pixel tags to collect information about your activities on our Services and other websites in order to deliver interest-based advertising or to help us measure the effectiveness of our advertising. Cookies may also be used to gather statistical data, such as frequently visited pages, downloaded content, and referring URLs.

For more information about our use of cookies and your options to manage or opt out of certain cookies, please refer to our **Cookies Policy**. Please note that disabling certain cookies may affect your ability to access or use certain features of the Services.

1.3 Information We Collect from Third Parties

In addition to information collected directly and automatically, we may receive information about you from third parties, including our clients, business partners, financial institutions, identity verification and KYC/AML service providers, credit reference agencies, sanctions screening providers, and publicly available sources (e.g., name, address, phone number, country of residence). This information is used to confirm your identity, assess risk, screen against sanctions lists, and prevent fraud and financial crime.

We may also receive information about you from other sources, such as business partners, data analytics providers, researchers, and social network services, to supplement our records and improve the Services.

2. How We Use Your Information

Pure Digital Exchange uses the information we collect for the following purposes:

- **Providing the Services:** To perform our obligations under any agreement with a PDE Client or End Customer, manage your account, and operate, monitor, maintain, and administer our Site and Services;
- **Communications:** To send you technical notices, updates, security alerts, and administrative messages, and to respond to your inquiries, comments, and customer

support

requests;

- **Marketing Communications:** To send you information about products, services, promotions, and events offered by Pure Digital Exchange and selected partners, in accordance with applicable legal requirements and your communication preferences;
- **Security and Fraud Prevention:** To detect, investigate, and prevent fraudulent transactions, unauthorized access, financial crime, and other illegal activities, and to protect the rights and property of Pure Digital Exchange and others;
- **AML, KYC, and Regulatory Compliance:** To verify your identity and the source of funds, conduct sanctions screening, monitor transactions for suspicious activity, fulfill recordkeeping obligations, and comply with applicable AML, counter-terrorism financing ("CTF"), and other financial regulatory requirements — including obligations under the **Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)** in Canada and applicable U.S. federal and state MSB regulations, including requirements administered by **FinCEN** under the Bank Secrecy Act ("BSA");
- **Service Improvement:** For internal operations, troubleshooting, testing, research, error correction, and the development of new products and features;
- **Analytics:** To monitor and analyze trends, usage patterns, and activities in connection with our Services;
- **De-identified Data:** To create de-identified or aggregated datasets for analytical and service improvement purposes; and
- **Other Purposes:** As described to you at the time of collection, or for other purposes with your consent.

Legal Bases for Processing

Applicable law in certain jurisdictions requires us to identify the legal grounds on which we rely to process your personal information. Our processing is based on one or more of the following:

- **Contractual Necessity:** Where processing is necessary to perform our obligations under a contract with you or to provide the Services you have requested;
- **Legitimate Interests:** Where processing serves our legitimate interests or those of third parties, such as maintaining the security of our Services, operating our business, making and receiving payments, defending our legal rights, and preventing fraud and financial crime;

- **Legal Obligation:** Where processing is required to comply with applicable laws and regulations, including AML/CTF recordkeeping and reporting obligations, sanctions compliance, tax and audit requirements, and other regulatory mandates applicable to MSBs; and
- **Consent:** Where you have provided your consent to processing for a specific purpose. You may withdraw consent at any time, though this may affect our ability to continue providing certain Services to you.

We may combine information collected through the Services with information received from other sources, online or offline, and use such combined information in accordance with this Policy.

3. Information We Disclose

Pure Digital Exchange may disclose your personal information to provide the Services and as otherwise permitted or required by applicable law. We do not sell your personal information to third parties. We may disclose your information in the following circumstances:

- **Affiliated Entities:** To our affiliates and related entities, as permitted by applicable law;
- **Service Providers and Business Partners:** To third-party contractors, service providers, and business partners — including financial institutions, payment processors, card networks, cloud hosting providers, KYC and identity verification providers, sanctions screening providers, customer support platforms, email service providers, analytics providers, and security and fraud prevention services — as necessary to provide the Services or to perform services on our behalf;
- **Marketing and Advertising Partners:** To marketing, referral, and advertising partners with whom we collaborate, in accordance with applicable law and your preferences;
- **Regulatory Authorities and Law Enforcement:** To law enforcement agencies, government authorities, financial intelligence units (including **FINTRAC** in Canada and **FinCEN** in the United States), regulators, and other public bodies, where we are required or permitted to do so by applicable law, court order, regulatory request, legal process, or where we reasonably believe disclosure is necessary to protect our rights, your safety, or the safety of others. As an MSB, we may be required by law to report certain transactions or suspicious activity without notifying you;
- **Legal and Compliance Purposes:** To third parties where we have a legitimate business purpose as permitted by applicable law, including for the purposes of fraud prevention, sanctions compliance, and financial crime prevention;

- **Business Transactions:** To companies, organizations, or individuals in connection with a merger, acquisition, sale of assets or shares, reorganization, financing, change of control, or similar transaction, or in the event of insolvency or bankruptcy proceedings; and
- **With Your Consent:** To other third parties where you have provided your authorization or consent.

We may also use or disclose aggregated, anonymized, or de-identified information that cannot reasonably be used to identify you, to the extent permitted under applicable law.

4. Retention of Your Information

We retain personal information for varying periods depending on the purposes for which it was collected and applicable legal requirements. We will delete or de-identify information when it is no longer needed for those purposes, unless a longer retention period is required or permitted by law.

As a registered MSB, Pure Digital Exchange is subject to mandatory recordkeeping obligations under applicable AML/CTF legislation, including the **PCMLTFA** and its associated regulations in Canada, and the **Bank Secrecy Act** and related FinCEN regulations in the United States. These obligations require us to retain certain records — including identity verification records, transaction records, and related documentation — for a minimum period prescribed by law (generally **five (5) years** under Canadian PCMLTFA regulations, and **five (5) years** under U.S. BSA requirements, though specific periods may vary by record type and jurisdiction). Where technical or operational constraints prevent us from fully deleting or de-identifying your information, we will implement reasonable measures to restrict further processing of that information.

5. Your Privacy Rights and Choices

5.1 Privacy Rights

Depending on your jurisdiction of residence, you (or an authorized agent acting on your behalf) may have the following rights with respect to your personal information, subject to applicable exceptions and limitations:

- **Right to Know and Access:** You may request confirmation of whether we hold personal information about you and, where applicable, receive a copy of that information. You may also request that your information be ported to another entity where technically feasible;
- **Right to Deletion:** You may request the deletion of certain personal information we hold about you, subject to our legal obligations to retain certain records (including AML/KYC

and MSB recordkeeping requirements);

- **Right to Correction:** You may request that we correct or update personal information that is inaccurate or incomplete;
- **Right to Object or Restrict Processing:** You may have the right to object to, or request restriction of, the processing of your personal information for certain purposes;
- **Right to Withdraw Consent:** Where processing is based on your consent, you may withdraw that consent at any time. Please note that withdrawal of consent may affect our ability to continue providing the Services;
- **Right to Opt-Out of Sale or Sharing:** You have the right to opt out of the sale or sharing of your personal information, including processing for targeted advertising purposes, to the extent applicable under the laws of your jurisdiction;
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any privacy rights available to you under applicable law;
- **Right to Lodge a Complaint:** You may file a complaint with the applicable privacy or data protection authority in your jurisdiction. In Canada, this includes the **Office of the Privacy Commissioner of Canada (OPC)** and applicable provincial privacy commissioners. In the United States, this may include relevant state attorneys general or consumer protection agencies; and
- **Right to Appeal:** Where applicable law provides for it, you may have the right to appeal our decision to deny a privacy rights request. If we deny your request, we will provide information on how to appeal, where applicable.

We will take reasonable steps to verify your identity before responding to any privacy rights request. If we are unable to verify your identity, we reserve the right to request additional information. If you are an End Customer, we may need to involve the applicable PDE Client to fulfill your request.

5.2 Marketing and Advertising Opt-Out

You may opt out of receiving marketing communications from us at any time, as permitted by applicable law. To stop receiving promotional emails, you may click the "unsubscribe" link included in such emails. Please note that you may not opt out of service-related or transactional communications. Requests may take a reasonable period of time to process.

Please refer to our **Cookies Policy** for information on managing cookie preferences.

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.

6. Cross-Border Transfers of Information

1. Pure Digital Exchange is incorporated in Delaware (USA) and Your personal information may be transferred to, stored in, accessed from, or processed in the United States, Canada, and other jurisdictions where we or our service providers maintain operations or infrastructure. Regardless of where your personal information is processed, we apply safeguards consistent with this Policy and applicable law. op

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 information is processed outside USA, it may be subject to the laws of the jurisdiction in which it is processed and may be accessible to law enforcement and national security authorities in accordance with those laws. Where your information is transferred internationally, we take reasonable steps to ensure it is protected in a manner consistent with this Policy and applicable law. Such measures may include contractual protections, data processing agreements, or other mechanisms recognized under applicable law.

By providing us with your personal information and using our Services, you acknowledge that your information may be transferred to and processed in jurisdictions outside your country of residence.

If you have concerns about our data handling practices, we encourage you to contact us at contact@puredigital.solutions directly in the first instance. You may also have the right to lodge a complaint with the applicable privacy authority in your jurisdiction.

7. Purpose of Collection and Disclosure of Personal Information

We collect and disclose personal information for the purposes described in this Policy, including to provide the Services, communicate with you, fulfill marketing and advertising activities, improve our Services, and meet our legal and regulatory obligations as an MSB.

We do not collect, use, or disclose sensitive personal information for purposes other than those set out in this Policy, to provide the Services, or as otherwise permitted under applicable law.

Categories of Personal Information Collected and Disclosed

In the preceding twelve (12) months, we have collected the following categories of personal information:

- Identifiers (name, address, email, phone, date of birth, government ID numbers, IP address, device identifiers);
- Government-issued identification information;
- Financial and payment information;

- Employment and professional information;
- Identity verification and KYC documentation; and
- Internet or network activity information (e.g., browsing history, usage data, device IDs).

We have disclosed the categories of personal information described in Section 1 with affiliated entities, third-party service providers, marketing partners, regulatory and law enforcement authorities, and parties involved in business transactions, as further described in Section 3.

Sensitive Personal Information Collected and Disclosed

In the preceding twelve (12) months, we have collected and disclosed the following categories of sensitive personal information with the parties described in Section 3:

- Government identification numbers (e.g., Social Security Number, Social Insurance Number, driver's license number, passport number, or state/provincial ID number); and
- Financial account credentials (e.g., account login, financial account number, debit or credit card number in combination with any required security code, password, or access credentials).

8. Information Security

We maintain a range of administrative, physical, and technical safeguards designed to protect your personal information against unauthorized access, use, processing, disclosure, alteration, loss, or destruction. In the event of a security incident that compromises personal information under our control, we will investigate the matter and, where appropriate and required by applicable law, notify affected individuals and relevant authorities, and take other remedial steps in accordance with our legal obligations.

Please be aware that no security measures are infallible or guaranteed to be completely effective. Accordingly, we cannot warrant or guarantee the absolute security of any information.

9. Children's Privacy

Our Services are not directed to individuals under the age of 18, and we do not knowingly collect personal information from minors. If we become aware that we have inadvertently collected personal information from a person under the age of 18, we will take prompt steps to delete that information. If you believe we may hold personal information about a minor, please contact us at contact@puredigital.solutions

10. Third-Party Links and Features

Our Services may contain links to, or integrate features from, third-party websites or services that are not owned or operated by Pure Digital Exchange. Unless expressly stated otherwise, we make no representations or warranties regarding such third-party links or features, or the products and services offered through them. We do not control the privacy or security practices of third parties, nor the jurisdictions in which they process data. We encourage you to review the

privacy and security policies of any third-party services you access, as their practices may differ materially from ours.

11. Contacting Us

If you have any questions, concerns, or requests regarding this Policy or our personal information handling practices, 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 contact the applicable privacy or data protection authority in your jurisdiction if you believe your privacy rights have not been adequately addressed:

- **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

12. Changes to This Policy

We may update this Policy from time to time. Any changes will become effective upon posting to our Services, as indicated by the updated date at the top of this Policy. If you have a registered account with us, we will notify you of any material changes using the contact information you have provided or through other means consistent with applicable legal requirements.