

Privacy Policy

CipherBC Muti-Party Computation Wallet is a secure digital asset wallet provided by CIPHERBC PTE. LTD. ("CipherBC", the "Company", the "Platform") based on the Multi-Party Computation (MPC) and Trusted Execution Environment (TEE) technology. For the convenience of expression in this Privacy Policy, the Platform is collectively referred to as "we" or "our" in this Privacy Policy.

We respect and protect the privacy of users (hereinafter referred to as "you" or "user"). When you use the Platform's services, we will collect and use your personal information in accordance with this Privacy Policy (hereinafter referred to as "this Policy").

We recommend that you read and understand the entire content of this Policy before using the services of this Platform. Your registration of an account on this Platform, access to this Platform and/or use of the services of this Platform indicate that you agree that you have read, understood, and accepted the content of this Policy and its updates and revisions from time to time. If you do not fully understand and accept this Policy, please do not register an account on this Platform or use any services of this Platform.

If you do not accept this Policy or any terms after updates and revisions, please stop using the services of this Platform immediately. Your continued use of the Platform services will be considered as acceptance of this policy and its updated and revised versions.

The definitions of key terms in this Policy are consistent with "User Agreement" of this Platform.

I. The Information We Collect from You

Please be aware that we collect the following information from you to meet your needs for the services of the Platform, and we place great importance on the protection of your privacy. When we collect your information, we strictly adhere to the principles of "legality, legitimacy, necessity". Please note that you can decide for yourself whether to provide us with your personal data, but if you do not provide your personal related information, we will not be able to continue to provide you with the services of this Platform.

When you register or use the services of this Platform, we will collect the following information from you:

1. Personal information provided by users when registering on this Platform. This includes but is not limited to your email address.

The specific purpose of our collection and processing of the above personal data is:

1. To verify users;
2. to verify your access to or use of the services and procedures of this Platform;
3. to establish and maintain good business relationships with you;
4. to understand your needs and whether you are suitable to use products and services, to notify you about transaction and financial information, advertisements, advertising messages and other news;
5. to provide you with products or services;
6. to process bills and collect fees;
7. to conduct surveys and obtain your feedback; and
8. to ensure that this Platform complies with relevant legal requirements.

2. Information Automatically Collected by the Platform. When you log in, register, or use the services of this Platform, we may automatically receive and record information sent to us by your computer, mobile phone, or other communication devices. This information includes but is not limited to your mobile device information, IP location, operation records, transaction records, transaction addresses, web page records, and data, etc.

The purpose of our collection of the above personal data is:

- (1) to analyze your usage of services of this Platform; and
 - (2) to develop and customize the services of this Platform based on your preferences.
3. In addition to the above personal information, you acknowledge that when you use specific features of this Platform, we will make a special prompt to you before collecting your personal information, requesting to collect more of your personal information. If you choose not to agree, it will be considered as your waiver of the use of that specific feature of the Platform.
4. When you are redirected to a third-party service provider, the third-party service provider will collect your personal information. This Platform does not hold the personal information collected by the third-party service provider.

5. Within the scope permitted by laws and regulations, this Platform may collect and use your personal information without your authorization in the following situations:

- (1) Related to national security and defense security;
- (2) Related to public safety, public health, and significant public interest;
- (3) Related to crime investigation, prosecution, trial, and judgment enforcement, etc.;
- (4) The collected personal information is what you have made public to society;
- (5) Collecting your personal information from legally disclosed information, such as legal news reports, government information disclosure, etc.;
- (6) Necessary for maintaining the security and compliance of the service, such as discovering and dealing with product and service failures; and
- (7) Other situations stipulated by laws and regulations.

II. How We Use Your Personal Information

1. We use your personal information so that we can provide services to you and provide analytics services through the Platform by authenticating your access to the Platform.

2. We will send you important notifications in a timely manner, such as software updates, changes to the User Agreement and terms of this Policy.

3. We provide you with a "Biometric Login" option in the "System Settings" of the Platform, allowing you to manage your digital currency conveniently and more securely.

4. We process the feedback you submit to us by collecting your public account address and the mobile device information you have provided.

5. We collect your personal information for internal audits, data analysis, and research, etc., to continuously improve our service level.

6. In accordance with the Platform's User Agreement and other relevant provisions of the Platform, we will use user information to manage and process user behavior.

7. Requirements stipulated by laws and regulations and in cooperation with regulatory authorities.

III. How You Can Control Your Information

You have the following autonomous control over your personal information:

1. Please be aware that you can modify the type of your digital currency, make transfers, and receive payments through the "Assets" section.
2. You can submit your questions and suggestions about the Platform to us at any time. We will be very happy to communicate with you and actively improve our services.
3. Please be aware that when we collect information from you for a specific purpose, we will notify you in advance, and you have the right to refuse. But at the same time, you acknowledge that when you choose to refuse to provide relevant information, it means that you give up using the relevant services of the Platform.
4. Please be aware that neither you nor we have control over whether your transaction records are public. Due to the open-source nature of the blockchain transaction system, your transaction records are public and transparent throughout the entire blockchain system.
5. Please be aware that when you use the Platform's function and are redirected to a third-party service provider, our User Agreement and Privacy Policy will no longer apply. Regarding your control over your personal information on the third-party service provider, we recommend that you read and understand its privacy rules and relevant user agreement in detail before using the third-party service provider.
6. This Platform will continue to use your personal information until you stop using our Platform's services or you have the right to contact us to request us to update, change, stop using, or delete your relevant personal information. However, in this case, we will not be able to continue to provide you with the Platform's services.

IV. We May Share or Transfer Your Information

1. The personal information of users we collect and generate will be stored on the server. If it is necessary for this Platform to transfer your personal information to other countries abroad, we will obtain your authorization in advance, carry out cross-border data transmission in accordance with the requirements of relevant laws, regulations, and policies, and fulfill the obligation of confidentiality for your personal information.
2. Without your prior consent, this Platform will not share or transfer your personal information to any third party, except in the following cases:
 - (1) Obtaining your explicit consent or authorization in advance;
 - (2) The collected personal information is the information you have publicly disclosed to the society;

- (3) The collected personal information is collected from legally publicly disclosed information, such as legal news reports, government information disclosure, etc.;
- (4) Sharing with the Platform's affiliates, we will only share necessary user information, and it is bound by the purposes declared in this Privacy Policy;
- (5) Based on a reasonable judgment, this Platform will share your personal information with important third parties. These important third parties include cooperative banks and their commissioned third-party service providers, telecommunications companies, and other service providers, to facilitate your use of this Platform's services, strengthen our KYC procedures to prevent fraud, and comply with anti-money laundering, anti-terrorism, and other related policies. If you do not agree that we share or transfer your personal information to important third parties, please contact us. But in that case, we may not be able to provide you with the Platform service.
- (6) Providing according to the requirements of applicable laws and regulations, legal procedures, administrative or judicial authorities; and
- (7) In the case of mergers and acquisitions, if the transfer of personal information is involved, this Platform will require the recipient of personal information to continue to be bound by this Policy.

V. How We Protect Your Information

1. If this Platform ceases operation, the Platform will promptly stop further collection of your personal information, announce the cessation of operation on the Platform, and delete or anonymize your personal information it holds about you within a reasonable period.
2. To protect your personal information, this Platform will adopt data security measures, improve the internal compliance level, increase internal staff information security training, and set secure access permissions for relevant data to protect your privacy information. We are committed to using various security technologies and supporting management systems to minimize the risk of your information being disclosed, damaged, misused, accessed without authorization, disclosed without authorization, and altered. In addition, this Platform will take other reasonably necessary measures to protect your information. For example, in the technical development environment, only de-identified information is used for statistical analysis; when providing research reports externally, the information contained in the report is de-identified. This Platform will store the de-identified information separately from the information that can be used to recover identification of individuals, ensuring that individuals are not re-identified in the subsequent processing of de-identified information.
3. This Platform has established a personal information protection responsibility department to carry out personal information security impact assessments on the collection, use, sharing,

and entrusted processing of personal information. Meanwhile, this Platform has established relevant internal control systems, adopting the principle of minimal necessary authorization for staff who may have access to your information. The actions of staff handling your information are systematically monitored, and continuous training is provided on relevant laws and regulations, as well as privacy and security guidelines, to enhance their awareness of security.

4. We will send you messages about information security in the Platform's Message Center and update account usage and information protection materials sometimes for your reference.

Important notice: This Platform uses secure Multi-Party Computing technology based on which the system will divide your private key into 3 pieces. When you perform a transaction, you need to obtain authorized signatures from the three parties before the transaction can be executed. You hold 1/3 of the key (User Key), and the other 2/3 is held by the Platform. Each key corresponds to a passphrase. The user-side passphrase can be stored offline by using the key. Please make sure to keep your user key and mnemonic phrase safe and secure. Your user key and passphrase are saved by you, and you are solely and fully responsible for the security and corresponding consequences of your user key and passphrase. If you lose, forget or cannot obtain your user key or passphrase, this Platform will not be able to recover your user key or passphrase.

Please make sure to keep your user password, account password and other identity credentials safe and secure. Once you leak the aforementioned information, you may suffer losses and it may have adverse effects on you. If you are aware that login information and/or other identity information may have been or have been leaked, please contact us immediately so that we can take timely measures to avoid or reduce related losses.

VI. Protection of Minors' Information

The following special provisions are made for the protection of minors under the age of 18:

1. Minors should use the Platform-related services under the guidance of their parents or legal guardians.
2. We recommend that parents and guardians of minors should guide minors to use the services of this Platform after reading this Policy, the User Agreement, and other annex documents and terms of this Platform.
3. This Platform will protect the confidentiality and security of minors' personal information in accordance with the provisions of relevant laws and regulations.

VII. Disclaimer

1. Please note that when you access third-party services through the Platform, the privacy policy published by that third-party service provider will apply. The collection and use of your personal information by such third-party service providers are not controlled by this Platform and are not bound by this Policy. We cannot guarantee that third-party service providers will definitely adopt personal information protection measures as required by us.

2. You should carefully choose and use third-party services, and properly protect your personal information. We do not bear any responsibility for the privacy protection of other third-party services.

3. This Platform will take reasonable security measures to protect your personal information to the extent possible under the existing technical level to avoid information leakage, tampering, or damage. The Platform uses wireless methods to transmit data, therefore, we cannot ensure the privacy and security of data transmitted via wireless networks.

VIII. Rights Related to Personal Information Protection

1. You can exercise or request the following rights to this Platform according to the provisions of this section:

- (1) Inquire or request to view;
- (2) Request for a copy;
- (3) Request to supplement or correct;
- (4) Request to stop collection, processing, or use; and
- (5) Request to delete.

2. If you request to inquire, view, or provide copies to this Platform according to the above rights, we should determine whether to agree to the request within fifteen (15) days from the date of your request. However, this does not apply in the following cases:

- (1) Interfering with national security, diplomacy and military secrets, overall economic interests, or other significant national interests;
- (2) Interfering with the execution of statutory duties by public authorities; and
- (3) Interfering with the significant interests of the collecting agency or a third party.

3. If necessary, the fifteen (15) days of the period can be extended, but the extension should not exceed fifteen (15) days, and the reason for the extension will be notified to you in writing (electronic or paper form). Also, we may charge procedural costs for inquiries, requests to view, or copying personal data.

4. If you request to supplement and correct your personal information collected by this Platform according to the above rights, this Platform will determine whether to agree to the request within thirty (30) days from the date of receiving your request, unless there is a dispute over the accuracy of your personal data. If necessary, the thirty-day period can be extended, but the extension should not exceed thirty (30) days, and the reason for the extension will be notified to you in writing (electronic or paper form).

5. You can contact us at support@cipherbc.com if you have any questions related to this Policy or your personal information protection.

IX. Miscellaneous

1. You need to fully understand and comply with all relevant laws, regulations, and rules of your jurisdiction related to the use of this Platform's services.

2. If you encounter any problems regarding the use of personal information during the use of the Platform's services, you can contact us by submitting feedback on the Platform and other methods.

3. You can view this Policy, the User Agreement, and other service rules of this Platform on the Platform's App or website. We encourage you to review the Platform's User Agreement and Privacy Policy each time you visit.

4. This Platform will update and revise this Policy from time to time. The updated and revised Policy will take effect when it is posted on the Platform.

5. For matters not covered in this Policy, please check the announcements and related rules updated by this Platform from time to time.