

KIN CAPITAL GROUP DIGITAL PRIVACY CENTER

Last Updated: 09/18/24

Protecting your privacy rights is important to Kin Capital Group, and we work to maintain the trust and confidence of our clients when handling personal or financial information.

Please see our notices below to learn about our privacy practices.

- Online Privacy Notice
- EEA/UK Privacy Notice (General Data Protection Regulation (GDPR))
- CCPA/CPRA Privacy Notice
- US Consumer Privacy Notice
- Singapore PDPA Privacy Notice
- **MANAGE YOUR PRIVACY PREFERENCES**

All Kin Capital Group users and those we hold information on have the right to access, correct, and update their information. We also allow Kin Capital Group users to unsubscribe from marketing emails. If you are a resident of the European Economic Area or the United Kingdom, you have additional rights concerning your personal data, discussed in the notices above.

For more information or to exercise a right, feel free to contact us at privacy@Kincapgroup.com

ONLINE PRIVACY NOTICE

Online Privacy Notice

Effective Date: 0918/24

1. INTRODUCTION

Kin Capital Group, and its subsidiaries and affiliates (collectively, "Kin Capital Group," "we", "our" or "us") offer a variety of custodial and liquidity products and services for cryptocurrency management and trading for our users ("you" or "Individuals"). These include secure digital asset custody, our trading platform, and services surrounding staking and transaction validation, on-chain governance, and financing. Privacy and data protection are a top priority for us, and we encourage you to read this Privacy Notice fully to understand our privacy practices.

2. SCOPE AND APPLICABILITY

2.1 This Online Privacy Notice ("**Notice**" or "**Policy**") explains how we collect, use, store, share, delete, and protect your Personal Information when you interact with us in any of the following ways (collectively, the "services"):-

2.1.1 by visiting Kin Capital Group's website at www.kincapgroup.com

2.1.2 by using our services and platform products, such as vaults and other custodial services, trading, settlement, staking, governance, and financing services;

2.1.3 by interacting or communicating with us as part of our marketing practices; and

2.1.4 by connecting with us at industry events and conferences.

2.2 Note that certain Kin Capital Group products may be covered under separate agreements with Kin Capital Group affiliates. If you have such an agreement in place with Kin Capital Group, please reference the agreement for details on how the services collect and use Personal Information.

2.3 This Policy also describes the choices that Individuals have with respect to their Personal Information, and how to contact Kin Capital Group to learn more about our privacy practices.

2.4 If you have obtained a financial product or service with Kin Capital Group to be used primarily for personal, family, or household purposes, we will use and share any information, including Personal Information that we collect from or about you in accordance with our U.S. Consumer Privacy Notice (available on our Kin Capital Group Privacy Centre page), which provides certain choices with respect to the use and sharing of your Personal Information.

2.5 Residents of the European Economic Area ("**EEA**") or the United Kingdom ("**UK**") may have additional rights regarding their Personal Information as discussed in the EEA/UK Privacy Notice (available on our Kin Capital Group Privacy Centre page).

3. PERSONAL INFORMATION WE COLLECT

We may collect Personal Information about you in several ways when you use our services, as described below.

3.1 Information You Provide. we collect the information you provide to us directly when you use our services. You can choose to provide Personal Information for:

3.2 Website Use – We collect some or all of the following Personal Information about you when you use our website to contact us:-

3.2.1 name;

3.2.2 email address; and

3.2.3 company information (state, institution type);

Other information you choose to provide to us when you contact us with your inquiries.

3.3 Onboarding Process – We collect some or all of the following Personal Information of applicants or their representatives (including control persons, beneficial owners, and authorized users) during the onboarding process:-

3.3.1 name/title;

3.3.2 email address;

3.3.3 Date of Birth;

3.3.4 entities you may be affiliated with;

3.3.5 country and region;

3.3.6 mailing address;

3.3.7 Tax ID number or equivalent;

3.3.8 voice recordings;

3.3.9 social Security Number;

3.3.10 phone number; and

3.3.11 government identification.

3.4 Institutional information – We also collect information about our institutional clients, for onboarding and compliance purposes. Types of information include:-

3.4.1 location of headquarters;

3.4.2 Federal Employer Identification Number (FEIN);

3.4.3 names of affiliated entities;

3.4.4 certificate of Good Standing;

3.4.5 information on your Know Your Customer/Anti-Money Laundering ("KYC/AML") program; and

3.4.6 financial history and details (investment activity, bank statements, balance sheets, etc.).

3.5 Identity Verification – In addition to the Personal Information described under "Onboarding Process," we may collect the following Personal Information to verify the identities of our clients or their representatives:-

3.5.1 photographic and video footage;

3.5.2 geolocation data;

3.5.3 voice recordings; and

3.5.4 additional information collected from your device (see below).

- 3.6 Transaction Execution – Once we verify your identity, we collect additional information to complete any requested transactions:-
 - 3.6.1 names of counterparties to transactions; and
 - 3.6.2 bank account information of counterparties to transactions.
- 3.7 Client Reporting – To execute our reporting services, we collect financial details (AUC balances, transaction information, etc.).
- 3.8 Research – For internal research and reporting.
- 3.9 Security – To block disruptive uses.
- 3.10 Job Applications – If you apply for a job with Kin Capital Group, in addition to collecting the Personal Information described under "Website Use," you will be directed to a third party platform that may collect the following Personal Information about you:-
 - 3.10.1 mailing address;
 - 3.10.2 phone number;
 - 3.10.3 job history;
 - 3.10.4 resume/CV; and
 - 3.10.5 LinkedIn profile;any other Personal Information you choose to submit along with your application including U.S. Equal Opportunity Employment Information.
- 3.11 Marketing Activities – If you attend our events, business meetings, visit our booth at industry conference or interact with our online or targeted marketing materials, in addition to the Personal Information described under "Website Use," we may collect one or more of the following business contact information about you:-
 - 3.11.1 company;
 - 3.11.2 job title/role;
 - 3.11.3 other information that may be contained on your business card, if you choose to provide one;
 - 3.11.4 phone number; and
 - 3.11.5 other information as described below in "Information We Collect".
- 3.12 Information We Collect from Third Parties. When you use our services, we collect the following information from third parties:-
 - 3.12.1 Referrals and Account Participant Invitations – We receive information about you, such as your name and email address, if an Kin Capital Group user refers you to our platform or invites you to participate on their account as an administrator, viewer, or spender;
 - 3.12.2 Integrations – We receive information about you via services you choose to integrate, such as where you link accounts from other service providers to your Kin Capital Group account;

- 3.12.3 Third Party Sign In – If you log in to our services using credentials from a third party (for example, Google), we will receive information that you have made public via your privacy settings with that third party;
- 3.12.4 Onboarding Process – We receive information about you via service providers that assist Kin Capital Group in gathering the required information for the KYC/AML program; and
- 3.12.5 Publicly Available Information. We may collect information about you via the following publicly available resources when you use our services:-

- (a) Public records

Note that we may combine information received from third parties or publicly available resources with information we have collected directly from you.

- 3.13 Information We Collect. When you use our websites or interact with our online targeted marketing materials, with your consent, we may use cookies and other tracking technologies to collect the following information about you:-

- 3.13.1 Browser and Device Information – Using cookies and other tracking technology, we may collect:-

- (a) geolocation data (e.g., zip code, GPS-based information including altitude);
- (b) motion tracking (e.g., number of steps taken, heart rate);
- (c) IP address;
- (d) Wi-Fi connectivity;
- (e) phone carrier and manufacturer;
- (f) mobile operating system version;
- (g) battery level;
- (h) device type/model;
- (i) version of Kin Capital Group application used;
- (j) http referrer fields;
- (k) browser type and version;
- (l) unique device identification numbers or pages viewed;
- (m) date and time of visit; and
- (n) number of times you return to our website or view content from our online targeted marketing materials;

the amount of time spent on content from online targeted marketing materials and other information related to your online behaviour and activity.

4. **COOKIES AND OTHER TRACKING TECHNOLOGIES**

- 4.1 We use information-gathering tools, such as cookies and other tracking technologies, to collect your Personal Information and other information as you use our services. Tracking technologies will only be deployed after you have permitted us to do so by providing consent.

- 4.2 What Are Cookies? Cookies are small text files that are stored through the browser on your computer or mobile device. Cookies serve a variety of functions; they help you navigate between website pages efficiently and may improve the user experience on a website. Cookies vary in duration (they can be "persistent" or "session-based"), and by whom they are served ("first party" cookies are directly from us; "third party" cookies are from other parties on our behalf). They are only one of several types of technologies used to track online behaviour.
- 4.3 Why We Use Cookies and Other Tracking Technologies. Kin Capital Group uses these technologies to collect information that helps us better serve our users and enhance this Site, such as by tracking return visits, collecting Site usage information, and performing research, analysis, and Site analytics. At Kin Capital Group, we use cookies to:-
- 4.3.1 administer our services;
 - 4.3.2 analyse services usage and trends;
 - 4.3.3 track how you were referred to our website;
 - 4.3.4 improve the services functionality;
 - 4.3.5 perform analytics and marketing integration; and
 - 4.3.6 deliver personalized advertisements and other marketing offers.
- 4.4 Types of Cookies We Use. On our website, we use the following types of cookies:-
- 4.4.1 Functional Cookies – We use cookies that are necessary for our services to run, including optimizing or powering features on the services and helping us identify irregular or fraudulent behaviour on the services.
 - 4.4.2 Performance and Analytics Cookies – We use performance and analytics cookies to understand how visitors engage with our website. These cookies help us:-
 - (a) understand how visitors arrive at our website;
 - (b) monitor website usage and performance;
 - (c) remember you when you return to the website; and
 - (d) improve our website content.
 - 4.4.3 Marketing and Advertising Cookies – Kin Capital Group and our service providers use marketing and advertising cookies to provide you with advertising based on your browsing activities and interests. These cookies monitor which ads have been served to your browser and which web pages you were viewing when such ads were delivered.
 - 4.4.4 Third Party Analytics and Integration – We use third party analytics and marketing integration services such as Google Analytics, Seismic and HubSpot to track and optimize our services' performance and marketing activities. To learn more about Seismic's' privacy practices, please visit [Seismic's Privacy Policy page here](#)].
 - 4.4.5 Google Analytics – Google Analytics helps us understand how users engage with our website. Like many services, Google Analytics uses first party cookies to track user interactions and in our case, they are used to collect information about how users use our website. This information is used to compile reports and to help us control the use of cookies. You can control the use of cookies through your web browser settings. Please note that if you reject or delete cookies, some of our website features may no longer function to improve our website and services. To learn more about Google Analytics' privacy practices, please visit [Google's Privacy Policy page here](#).

- 4.4.6 Cross-Device Tracking – Kin Capital Group and our service providers match your browsing activity on our website across different devices. For example, if you browse our website via a mobile device and move to a laptop, we attempt to match your browsing activity from the two devices.
- 4.4.7 Managing Cookies & Online Tracking. Where appropriate or legally required, we will describe how we use the information collected about you so that you can make choices about how your information is used.
- 4.4.8 Managing Cookies – You can control the use of cookies on your device at any time by changing your preferences or options in your browser settings. Each browser provides different mechanisms for managing cookies. You can usually find these settings in the "Options" or "Preferences" menu of your browser; otherwise, look at your browser's help menu to determine the best way to modify your browser's cookie storage. You can also block, disable, or delete the cookies that are stored on your device. However, blocking, disabling, or deleting cookies may limit your ability to view all the pages on our services. To find out more about cookies, including how to see what cookies have been set and how to block and delete cookies, please visit <http://www.aboutcookies.org/>.
- 4.4.9 Analytics Preferences – For information on how Google Analytics collects and processes data, visit www.google.com/policies/privacy/partners/. To learn more about Google Analytics, visit Google's "How you can control the information collected by Google on these sites and apps" article available [here](#).
- 4.4.10 "Do-Not-Track" – Some browsers allow a user to send "Do-Not-Track" signals to a website to prevent tracking of that Individual's activity. At this time, we do not respond to web browser "Do-Not-Track" signals. To learn more about browser tracking signals and DNT, visit <http://www.allaboutdnt.com>.
- 4.4.11 Targeted Advertising – Targeted advertising (also known as online behavioural advertising) is the practice of collecting and using Personal Information from a device, particularly concerning browsing history, and using it to deliver advertisements that may be of specific interest to that user. Some companies that we work with may use cookies and other tracking technologies to deliver targeted advertisements. We will require you to opt in for your Personal Information to be collected in order to receive targeted advertisements.

5. **HOW WE USE PERSONAL INFORMATION**

We use Personal Information we have about you as described below.

- 5.1 Provide Our Services – We use the information we have about you to manage your account and provide our services. We also use your information to diagnose and resolve issues with our services, provide technical and customer support, ensure the safety, quality, and availability of the services, including verifying your identity and detecting, preventing, and prosecuting those responsible for security incidents or malicious, deceptive, fraudulent, or illegal activity.
- 5.2 Communicate with You – We use the information we have about you to respond to your inquiries, requests, and/or send important notices. This includes, for example, delivering customer support, and periodic emails related to company news, updated policies, product/service updates and information, job openings, or press releases.
- 5.3 Market Our Services – We use the information we have about you to market our services. This includes, for example, sending you email communications about products, offerings, events and webinars or customized offers or materials.
- 5.4 Improve Our Services – We use the information we have about you to improve our services. This includes, for example, identifying usage trends, developing data analysis, determining the effectiveness of our promotional campaigns, evaluating our business performance, researching, demonstrating, developing and improving our products and

services, and ensuring quality control. This can also include personalizing your experience.

- 5.5 User Testing and Surveys – We use the information we have about you to invite you to participate in user testing and surveys and provide feedback to us (in accordance with any privacy preferences you have expressed to us).
- 5.6 Comply with The Law – We use the information we have about you to comply with applicable laws, regulations, and contractual obligations. This includes, for example, conducting compliance and/or security checks, audits, or assessments, enforcing our contracts and agreements with our customers, or complying with applicable law enforcement obligations.
- 5.7 Protect Our Assets – We use the information we have about you to resolve disputes and protect the rights, property, safety and interests of Kin Capital Group and our site visitors, customers, and the public. We ensure the security of our assets, systems and networks, prevent, detect and investigate fraud, unlawful or criminal activities in relation to our services, and enforce our terms and conditions. We enforce any legal terms that govern your use of our website or application.
- 5.8 Other Purposes You Consent To – We use the information we have about you for other purposes if you consent to those uses at the time you provide your Personal Information.
- 5.9 De-identified or Aggregate Information – We use the information we have about you to create de-identified or aggregate information, such as de-identified demographic or location information, information about devices used to access our services, or other relevant analyses. We also share such data with any third parties, including advertisers, promotional partners, sponsors, event promoters, etc.

6. **HOW WE SHARE PERSONAL INFORMATION**

Kin Capital Group may share the Personal Information we have about you as described below.

- 6.1 Service Providers and Other Third Parties – We share information we have about you with third parties and service providers who assist us with administering the services. This includes, for example, IT service providers, data storage providers, identity verification service providers, and marketing service providers.
- 6.2 Across Our Affiliates – We share information across Kin Capital Group's family of companies to provide you with our services, prevent fraud, conduct identity verifications, comply with the law, or in the event of a sale, merger, acquisition, or other liquidity event.
- 6.3 Business Partners or Joint Offerings – In certain situations, we may offer products or services jointly with a business partner. In such an event, we will share your information with a business partner for the purpose of facilitating the offering. In such a case, the business partner's name will appear along with ours on the product or service.
- 6.4 Advertising Partners – We may share information with third parties to facilitate advertising on third party websites or mobile apps. If you do not want your Personal Information shared with our advertising partners, contact us as described in section 11 "Contact Us."
- 6.5 Sale, Merger, or Acquisition – As we continue to develop our business, we may buy, merge or partner with other companies. In such transactions, (including in contemplation of such transactions, e.g., due diligence) user information may be among the transferred assets. If a portion or all of Kin Capital Group's assets are sold or transferred to a third-party, end-user information would likely be one of the transferred business assets.
- 6.6 Protection of Kin Capital Group or Others – Kin Capital Group accesses, preserves, and discloses Personal Information in a good faith belief that such access, preservation, or disclosure is permitted by Kin Capital Group's Privacy Program Policy or reasonably necessary or appropriate for any of the following reasons:-

- 6.7 to enforce this Privacy Policy, our Terms of Service, or other contracts with you, including investigation of potential violations thereof;
- 6.8 to enforce our agreement with our Client (i.e. the applicable Custody Service Agreement);
- 6.9 to respond to your requests for customer service; and
- 6.10 to protect the rights, property, or personal safety of Kin Capital Group, its agents and affiliates, its users, and the public; and/or to defend Kin Capital Group or others against third party claims or allegations.
- 6.11 Legal, Regulatory, Safety, and Compliance Purposes – In certain situations, we may be required to share your information with law enforcement officials or government authorities as required by laws, regulations, legal processes, and governmental requests. These situations may include, but are not limited to:-
 - 6.11.1 complying with a subpoena or other legal process requests;
 - 6.11.2 protecting your rights;
 - 6.11.3 protecting your safety or the safety of others;
 - 6.11.4 investigating fraud; and
 - 6.11.5 responding to a government request.
- 6.12 Any third parties that we share your Personal Information with are limited by law and by contract in their ability to use your Personal Information. Kin Capital Group requires third party service providers acting on our behalf or with whom we share your information to provide appropriate security measures in accordance with industry standards and in compliance with this Policy, their privacy and security obligations, and any other appropriate confidentiality and security measures. However, we are not responsible for the privacy and data security practices of third parties outside of Personal Information we receive from or transfer to them.
- 6.13 If you elect to receive periodic email communication from us (i.e., company news, product and service information), you may choose to opt out from receiving such communications by clicking the 'Unsubscribe' link provided in these emails.

7. **HOW WE PROTECT PERSONAL INFORMATION**

- 7.1 At Kin Capital Group, we take our responsibility to protect the security and privacy of your Personal Information seriously. We are committed to maintaining the confidentiality, integrity, and security of your Personal Information and taking precautions to protect such information. We use reasonable and appropriate administrative, technical, and physical safeguards to protect information we have about you from loss, theft, and unauthorized use, access, modification, or destruction. We regularly review our established policies and procedures to ensure that they are appropriate and effective at meeting our commitment to our community, our customers, and ourselves. We also require third party service providers acting on our behalf or with whom we share your information to maintain security measures consistent with industry standards.
- 7.2 Additionally, to help protect your privacy and maintain security, we verify your identity before granting you access to your information or your account. Our verification methods include requiring Individuals to create video footage of themselves reciting their password before conducting a transaction, and the collection of biometric and geolocation data. Notwithstanding our security safeguards, it is impossible to guarantee absolute security in all situations. If you have any questions about the security of our services, please contact us as described in section 11 "Contact Us." For your own online security, please do not send any other confidential Personal Information to us via email or through the contact form on our website.

8. **CHILDREN'S PRIVACY**

8.1 Our services are not intended for persons under the age of 18, and we do not knowingly or intentionally collect any Personal Information from, or market to, Individuals under the age of 13.

8.2 If we become aware, or If you learn that an individual under the age of 13 has provided us with Personal Information contrary to these rules, please contact us as described in section 11 "Contact Us" and we will delete the information from our systems.

9. **THIRD PARTY SERVICES, APPLICATIONS, AND WEBSITES**

Certain third party services, websites, or applications used to navigate to and from Kin Capital Group services have separate user terms and privacy policies that are independent of this Policy. We are not responsible for the privacy practices of these third party services or applications. We recommend carefully reviewing the user terms and privacy statement of each third party service, website, and/or application before use.

10. **CHANGES TO THIS NOTICE**

We may change or update this Online Privacy Notice in the future. When we do, we will post the revised version on our website. This notice was last updated and became effective on the date posted at the top of this page.

11. **CONTACT Us**

If you have questions about this Notice, or if you wish to exercise any of your rights in relation to your Personal Information, please contact us. You can email us at Privacy@kincapgroup.com.

EEA/UK (GDPR) Privacy Notice

Effective Date: 09/18/24

1. **APPLICABILITY OF THE GDPR PRIVACY NOTICE**

This Privacy Notice ("**Notice**") applies to Individuals that are located within the European Economic Area (EEA) and the United Kingdom (UK), and supplements Kin Capital Group's Online Privacy Notice. We adopt this Notice to comply with the General Data Protection Regulation ("**GDPR**"). The GDPR defines Personal Data as any information relating to an identified or identifiable natural person ("**Data Subject**").

2. **LEGAL BASIS FOR PROCESSING PERSONAL DATA**

2.1 If you are located in the EEA or the UK, we only process your Personal Data for specific reasons and when we have a valid legal basis for processing under applicable data protection laws.

2.2 The legal bases on which we rely on to process your Personal Data, as appropriate, are set out below:-

2.2.1 necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract;

2.2.2 necessary for compliance with a legal obligation or regulatory obligation; and

2.2.3 necessary for us to realize a justified and legitimate interest considering your privacy and other fundamental rights and interests. This may include:-

- (a) running an effective operation of the Kin Capital Group services and administering related services;
- (b) operating our services;
- (c) protecting the security of our systems, detecting or preventing fraud;
- (d) marketing, market research, business development, and providing you with information regarding other Kin Capital Group and Kin Capital Group affiliate products or services;
- (e) internal group administrative purposes; and
- (f) with your consent;

Where applicable, wherever we rely on the consent legal basis, you may withdraw such consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal.

3. **PERSONAL DATA WE COLLECT**

3.1 Personal Data is data relating to an identified or identifiable Individual. Sensitive Personal Data (or "Sensitive Personal Information") is data that reveals a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, membership in trade unions, genetic data, biometric data, and data concerning health, sex life or sexual orientation. We collect Personal and Sensitive Personal Data from you in several ways when you use our services as described below. For more information, please see our Online Privacy Notice.

3.2 Directly from Individuals: We collect information when Individuals use our website or mobile application or register with us. We will also collect information when Individuals place an order, subscribe to our marketing activities, respond to a survey, or to report on our Clients' financial information. This information includes names, email addresses, phone numbers, and other demographic and contact information.

- 3.3 From Third Parties: We collect information from third parties including an Individual's company and from those who validate identity. Examples of these collection methods include referrals from other Kin Capital Group users, integration of cryptocurrency service providers, and third-party sign-in credentials. (e.g., Google).
- 3.4 From Individuals Passively: We use third party tools to collect information from Individuals when visiting our website and mobile application. Using cookies and other tracking technologies, we will automatically collect:-
- 3.4.1 unique device identification numbers;
 - 3.4.2 device type;
 - 3.4.3 operating system version;
 - 3.4.4 browser type and version;
 - 3.4.5 pages viewed;
 - 3.4.6 links clicked;
 - 3.4.7 IP address;
 - 3.4.8 date and time of visit;
 - 3.4.9 number of times you return to our website;
 - 3.4.10 geolocation data (GPS-based information);
 - 3.4.11 motion tracking (e.g., number of steps taken, heart rate); and
 - 3.4.12 Wi-Fi connectivity.
- 3.5 For information on how to manage your cookies preferences, please see our Online Privacy Notice.
- 3.6 Security and Authentication: We collect certain information to protect our users' information, and to verify an Individual's identity. This involves collecting biometric data, such as voiceprints, video and photographic footage, geolocation data, and motion tracking information (see above). These are the only type of Sensitive Personal Data we collect, and we will not collect this information without obtaining your consent first.
- 3.7 Combining Information: We combine information received from third parties with information already stored. We will also combine information from an Individual's profile with information submitted from surveys.

4. **HOW WE USE YOUR PERSONAL DATA**

We use the Personal Data we have about you for the purpose for which it was collected or provided to us (as stated at the point of collection). Your Personal Data will be used to: provide our services, communicate with you, market and improve our services, conduct surveys, comply with the GDPR and other applicable laws, protect our assets, perform other purposes with your consent, and create de-identified or aggregate information. For more information about how we use your Personal Data, please see our Online Privacy Notice.

5. **PERSONAL DATA RETENTION & STORAGE**

- 5.1 Kin Capital Group only keeps or processes Personal Data for as long as necessary to carry out its business and legal purposes. Personal Data is deleted or anonymized when no longer required for the purposes for which it was collected, in accordance with our Record Retention Policy and Media Sanitization Policy. The specific periods for which we keep information about you vary depending on the nature of the information, why we need it, and whether the Personal Data is de-identified.

We also consider the minimum necessary retention period prescribed by applicable laws, recommended by industry standards, and stated in contracts and other legal obligations. Additionally, you may request deletion of your Personal Data consistent with section 7 "Individual Rights" below.

5.2 We may be legally required to retain your Personal Data to:-

5.2.1 comply with legal obligations;

5.2.2 resolve disputes; and

5.2.3 enforce rights.

Storage: We may use data hosting service providers in the U.S., Germany, and Singapore to store information we have about you, and we use reasonable technical measures to secure your information.

6. **PERSONAL DATA SHARED WITH THIRD PARTIES**

6.1 We share information we have about you with third parties, service providers, and Kin Capital Group affiliates who assist us with administering our services and advertising on Kin Capital Group, Kin Capital Group affiliate, and third party platforms. We at times partner with other companies to offer products or services jointly; we may share your Personal Data in order to facilitate that offering.

6.2 Any third parties that we share your Personal Data with are limited by law and by contract in their ability to use your Personal Data. Kin Capital Group requires third party service providers acting on our behalf or with whom we share your information to provide appropriate security measures in accordance with industry standards and in compliance with this Policy, their privacy and security obligations, and any other appropriate confidentiality and security measures. However, we are not responsible for the privacy and data security practices of third parties outside of Personal Data we receive from or transfer to them. For additional information, please see our Online Privacy Notice.

7. **INDIVIDUAL RIGHTS**

Kin Capital Group would like to make sure you are fully aware of all of your data protection rights. Every user in the EEA or UK is entitled to the following:-

7.1 The right to access: You have the right to request copies of your Personal Data from Kin Capital Group;

7.2 The right to be informed: You have a right to be informed about the collection and use of your Personal Data;

7.3 The right to rectification: You have the right to request that Kin Capital Group corrects any information you believe is inaccurate. You also have the right to request that we complete any information you believe is incomplete;

7.4 The right to erasure: You have the right to request that Kin Capital Group erases your Personal Data, under certain circumstances;

7.5 The right to restrict processing: You have the right to request that Kin Capital Group restricts the processing of your Personal Data, under certain circumstances.

7.6 The right to object to processing: You have the right to object to Kin Capital Group's processing of your Personal Data, under certain circumstances.

7.7 The right to data portability: You have the right to request that Kin Capital Group transfer its data on you to another organization, or directly to you, under certain conditions.

7.8 The right not to be subject to a decision based solely on automated processing: You have a right not to be subject to a decision when it is based on automated processing and it produces an adverse legal effect (or a similarly significant effect).

7.9 If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email: Privacy@kincapgroup.com.

8. **COOKIES AND OTHER TRACKING TECHNOLOGIES**

8.1 Cookies are small text files that are stored through the browser on your computer or mobile device. Cookies and other trackers serve a variety of functions; they help you navigate between website pages efficiently and may improve the user experience on a website. Cookies vary in duration (they can be "persistent" or "session-based"), and by whom they are served ("first party" cookies are directly from us; "third party" cookies are from other parties on our behalf).

8.2 Kin Capital Group and our service providers use cookies and similar technologies on our website and mobile application to collect information about your browsing activities over time and across different website pages. At Kin Capital Group, we use these tools to:-

8.2.1 administer our services;

8.2.2 analyse services usage and trends;

8.2.3 track how you were referred to our website;

8.2.4 improve the services functionality;

8.2.5 perform analytics and marketing integration; and

8.2.6 deliver advertisements and other marketing offers.

8.3 We will require you to opt in to each type of tracking device (categorized by their purpose) before they collect your Personal Data.

8.4 For further information please review Kin Capital Group's Cookie Notice (available at section 4 of the Online Privacy Notice, on our Kin Capital Group Privacy Center page).

9. **DATA TRANSFER**

9.1 Kin Capital Group has group companies in the United States (U.S.). We may use data hosting service providers in the U.S. to host the information we collect from or about you. When we transfer your Personal Data outside of the EEA or the UK, we will do so in accordance with the GDPR using a valid cross-border transfer mechanism. To the extent required by applicable law, we will protect the cross-border transfer of your Personal Data through the use of applicable legal adequacy mechanisms. We generally use approved Standard Contractual Clauses to ensure the Personal Data is adequately protected when it is transferred outside the EEA or the UK to countries without an adequate level of data protection.

9.2 Please contact us via email at Privacy@kincapgroup.com if you would like more information about cross-border transfers. We also transfer your Personal Data to third parties as described above in section 6, "Personal Data Shared with Third Parties".

10. **PRIVACY POLICIES OF OTHER WEBSITES**

The Kin Capital Group website and mobile application contain links to other websites. Our privacy notice applies only to our website and mobile application, so if you click on a link to another website, you should review their privacy notice.

11. **CHANGES TO THIS NOTICE**

We may change or update this Online Notice in the future. When we do, we will post the revised version on our website. This notice was last updated and became effective on the date posted at the top of this page.

12. **CONTACT Us**

If you have any questions about this policy or our privacy practices please contact us. You can write to us at privacy@Kincapgroup.com

US Consumer Privacy Notice

Last Updated: 09/18/24

Why?

Companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect, and share depend on the product or service you have with us. This information can include:-

- Social Security number and Contact information (name, address, email address, phone number)
- Date of Birth and Tax ID number
- Account balances and transaction history
- Video and/or audio recordings and Device information

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons companies can share their customers' personal information; the reasons Kin Capital Group chooses to share; and whether you can limit this sharing.

Reasons we can share you personal information	Does Kin Capital Group share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes to offer our products and services to you	Yes	No
For joint marketing with other companies	No	We do not share
For our affiliates' everyday business purposes information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes information about your creditworthiness	No	We do not share
For our affiliates to market to you	Yes	Yes
For our non-affiliates to market to you	No	We do not share

To limit our sharing

Email Privacy@kincapgroup.com to elect the below choice(s) and one of our representatives will update your privacy choice(s):-

- Do not allow your affiliates to use my personal information to market to me.

- Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions?

Please contact Privacy@kincapgroup.com.

Who we area

Kin Capital Group and its affiliates.

What we do

How does Kin Capital Group protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We use reasonable and appropriate administrative, technical, and physical safeguards to protect information we have about you from loss, theft, and unauthorized use, access, modification, or destruction. We regularly review our established policies and procedures to ensure that they are appropriate and effective at meeting our commitment to our community, our customers, and ourselves. We also require third party service providers acting on our behalf or with whom we share your information to maintain security measures consistent with industry standards.

How Does Kin Capital Group collect my personal information?

We collect your personal information, for example, when you open an account or deposit funds, take part in our marketing activities or respond to a survey. We also may collect information from your company or other third parties, and by using third party tools, like cookies and other trackers.

What happens when I limit sharing for an account I hold jointly with someone else?

When you limit sharing on an account jointly shared with someone else, Kin Capital Group will apply the decision to everyone on the account. Any account holder may express a privacy preference on behalf of the other joint account holders.

Definitions

Affiliates

Companies related by common ownership or control. Kin Capital Group and our related companies with common and uncommon corporate identity names, such as Kin Capital Group and other companies owned or controlled by Kin Capital Group.

Nonaffiliates

Companies not related by common ownership or control. Nonaffiliates we may share you information with can include IT service providers, data storage providers, identity verification service providers, and marketing service providers.

Joint marketing

A formal agreement between nonaffiliated companies that together market products or services to you.

Other important information

California Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law. See our CCPA Privacy Notice for more information. Telephone communications with us may be monitored or recorded.

CCPA/CPRA Privacy Notice

Last Updated: [REDACTED]

1. APPLICABILITY OF CCPA PRIVACY NOTICE

- 1.1 This Privacy Notice ("**Notice**") applies solely to California residents and supplements Kin Capital Group's Online Privacy Notice. We adopt this Notice to comply with the California Consumer Privacy Act of 2018 ("**CCPA**") as amended by the California Privacy Rights Act of 2020 ("**CPRA**").
- 1.2 Under the CCPA, 'Personal Information' is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked directly or indirectly with a particular California resident or household.
- 1.3 The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act ("**GLBA**"), the Fair Credit Reporting Act, and certain other state or federal privacy laws. For example, this CCPA Notice does not apply to information that we collect about Individuals located in the U.S. who seek, apply for, or obtain our products and services for personal, family, or household purposes, which is subject to our U.S. Consumer Privacy Notice.

2. CATEGORIES OF PERSONAL INFORMATION WE COLLECT AND DISCLOSE

- 2.1 Most of the information we collect is in the context of providing products or services and is therefore not subject to the CCPA. We do collect Personal Information relating to California residents in other contexts, including for employment and recruiting purposes, marketing activities and interaction with our website that may include Sensitive Personal Information as defined under the CPRA.
- 2.2 In the past 12 months, we may have collected and disclosed to third parties for our business purposes the following categories of Personal Information about you in several ways when you use our services, as described below:-
 - 2.2.1 Identifiers: name, email, and address (e.g., Social Security Number);
 - 2.2.2 Personal Information, as defined in the California safeguards law: contact and financial information;
 - 2.2.3 Characteristics of protected classifications under California or federal law: sex and marital status;
 - 2.2.4 Commercial Information: products or services purchased and account information;
 - 2.2.5 Internet or other similar network activity: browser type, pages viewed, and links clicked;
 - 2.2.6 Biometric Information video footage and voiceprints;
 - 2.2.7 Geolocation Data: device location;
- 2.3 Professional or employment-related information: occupation, job title, employment email or prior employer.
- 2.4 Sensory Data: audio recordings of customer care calls, electronic, visual or similar information.
- 2.5 Inferences are drawn from any of the Personal Information listed above to create a profile about, for example, an Individual's preference and characteristics.

3. SOURCES OF PERSONAL INFORMATION

The categories of sources from whom we collect Personal Information are:-

- 3.1 Directly from a California Resident: We collect information when you register on our site or fill out a profile. We also collect information when you create an account with Kin Capital Group (including the identity verification process), subscribe to our promotional campaigns, or respond to a survey. We also collect information when you apply for a job with Kin Capital Group, service as a Board Member or Officer, or work for Kin Capital Group as an employee or independent contractor.
- 3.2 From Third Parties: We may collect information through referrals from other Kin Capital Group users, from an Individual's employer, or from our service providers (e.g., those that validate identity) or perform Anti-Money Laundering ("AML") or Know-Your-Customer ("KYC") services).
- 3.3 From Individuals Passively: We use third party tools to collect information from Individuals from our website, online targeted marketing materials and mobile application.
- 3.4 Publicly Available Information: We collect information about you via publicly available resources listed in our Online Privacy Notice.
- 3.5 Combining Information: We combine information received from third parties with information already stored. Kin Capital Group may also combine information from an Individual's profile with information submitted from surveys.

4. **HOW WE USE PERSONAL INFORMATION**

Most of the information we use is for the provision of financial products or services and is therefore not subject to the CCPA. We may use Personal Information of California residents for one or more of the following business purposes as described below.

- 4.1 auditing related to counting ad impressions;
- 4.2 ensuring security and integrity of our use of your Personal Information;
- 4.3 debugging to repair errors to ensure our products' functionality;
- 4.4 marketing, particularly short-term use of Personal Information for personalized and non-personalized advertising and online targeting advertising;
- 4.5 to market to you and provide you with information about other products and services from us and/or our affiliates;
- 4.6 business services, including servicing accounts, customer service, processing transactions, etc;
- 4.7 internal research for technological development;
- 4.8 maintaining the quality and security of Kin Capital Group services; and
- 4.9 Investigations: detecting, investigating and preventing breaches of policy, and criminal offenses, in accordance with applicable law;

Providing employee benefit and accommodation management, regulatory reporting and requirements, job reviews and salary management, and recruiting efforts, including setting up interviews, extending offers, communicating feedback, and determining fits for job openings.

For additional information on how we use Personal Information see our Online Privacy Notice.

5. **SALE OF PERSONAL INFORMATION**

- 5.1 As a California resident, you have the right to direct a business that sells your Personal Information to third parties not to sell your Personal Information. This right is referred to as "the right to opt-out of sale of Personal Information."

5.2 We do provide a cookie banner and consent management that incorporates a browser setting that notifies our website of your privacy preferences known as Global Privacy Control, ("GPC") on our website for you to exercise the right to opt out.

6. **CATEGORIES OF THIRD PARTIES DISCLOSURE**

We may disclose Personal Information to the following third parties for a business purpose.

Category	Purpose
Affiliates, Subsidiaries & other Kin Capital Group Entities	To fulfil contractual obligations and process requests initiated by you, to market to you, and for other purposes previously listed in section 4.
Service Providers & Contractors	Personal Data may be shared with service providers, contractors, and other third parties to assist in the provision of the Services, improve the our Services, process analytic data derived from our website, application, and other products, market to you, process analytics related to marketing data, and other purposes previously listed in section 4.
Sales & Merger	As we continue to develop our business, we may buy, merge or partner with other companies. In such transactions, (including in contemplation of such transactions, e.g., due diligence) user information may be among the transferred assets. If a portion or all of Provider's assets are sold or transferred to a third-party, end user information would likely be one of the transferred business assets.
Government Entities	Personal Data may be disclosed to legal or regulatory authorities pursuant to various legal and/or regulatory obligations.

Third Party Responsibilities – Any third parties that we share your Personal Information with are limited by law and by contract in their ability to use your Personal Information. Kin Capital Group requires third-party service providers acting on our behalf or with whom we share your information to provide appropriate security measures in accordance with industry standards and in compliance with this Policy, their privacy and security obligations, and any other appropriate confidentiality and security measures. However, we are not responsible for the privacy and data security practices of third parties outside of Personal Information we receive from or transfer to them.

7. **PRIVACY CHOICES AND RIGHTS**

7.1 The CCPA/CPRA provides California residents with specific rights regarding their Personal Information. If you are a California resident, you may have the following rights.

7.2 Request we disclose to you free of charge the following information covering the 12 months preceding your request:-

- 7.2.1 the categories of Personal Information about you that we collected;
- 7.2.2 the categories of sources from which the Personal Information was collected;
- 7.2.3 the business or commercial purpose for collecting Personal Information about you;
- 7.2.4 the categories of third parties with whom we share that Personal Information; and
- 7.2.5 the specific pieces of Personal Information we collected about you.

- 7.3 Request that we delete, limit or correct any of your Personal Information we collected from you, unless a CCPA exception is applicable.
- 7.4 Be free from unlawful discrimination for exercising your rights under the CCPA
- 7.5 We will acknowledge receipt of your request and advise you how long we expect it will take to respond if we are able to verify your identity. Requests for specific pieces of Personal Information will require additional information to verify your identity.
- 7.6 Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. If you are an authorized agent, please send us proof that the consumer gave you written permission to submit the request and we will verify your identity as provided above. We may also require the consumer to verify their own identity with us and/or directly confirm with us that they have given you permission to submit the request.
- 7.7 You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:-
- 7.7.1 provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; and
 - 7.7.2 describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- 7.8 We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.
- 7.9 We will work to process all verified requests within 45 days pursuant to the CCPA. If we need an extension for up to an additional 45 days in order to process your request, we will provide you with an explanation for the delay.
- 7.10 If you are a California resident, you may submit a request by:-
- Emailing us at Privacy@kincapgroup.com.

8. **CHANGES TO THIS NOTICE**

We may change or update this CCPA Notice in the future. When we do, we will post the revised CCPA Notice on our website. This CCPA Notice was last updated and became effective on the date posted at the top of this page.

9. **CONTACT US**

If you have questions about this Notice, or if you wish to exercise any of your rights in relation to your Personal Information, please contact us. You can call us at ([insert]) or write to us at Privacy@kincapgroup.com.

Singapore Privacy Notice

Last Updated: 09/18/24

1. APPLICABILITY OF PDPA PRIVACY NOTICE

1.1 This Privacy Notice ("**Notice**") applies solely to residents of Singapore and supplements Kin Capital Group's Online Privacy Notice. We adopt this Notice to comply with the Personal Data Protection Act (No 26 of 2012) ("**PDPA**"), including subsidiary legislation and the Personal Data Protection Regulation of 2021 ("**PDPR**").

1.2 Under the PDPA, "Personal data" refers to all "data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which the organisation has or is likely to have access" (regardless of whether such data is in electronic or another form or degree of sensitivity). The PDPA uses the term "organisation" to cover those entities who are obligated to comply with the PDPA. Organisations broadly covers natural persons, corporate bodies (such as companies) and unincorporated bodies of persons (such as associations), regardless of whether they are formed or recognised under the law of Singapore, or are resident or have an office or place of business in Singapore.

1.3 The PDPA, however, does not apply to certain categories of organisations:-

1.3.1 individuals acting in a personal or domestic capacity;

1.3.2 employees acting in the course of their employment with an organisation;

1.3.3 public agencies; or

any other organisation or personal data, or classes of organisations or personal data as may be prescribed.

1.4 Moreover, the PDPA also does not apply to certain information, such as information subject to the Banking Act of 1970 or other sector specific national laws. The PDPA also expressly excludes the following categories of personal data from its application:-

1.4.1 'business contact information', which is defined as 'an individual's name, position name or title, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his personal purposes', unless expressly referred to in the PDPA;

1.4.2 personal data that is contained in a record that has been in existence for at least 100 years; and

1.4.3 personal data about a deceased individual who has been dead for more than 10 years.

2. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

We generally do not collect your Personal Data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorized by you to disclose your Personal Data to us (your "authorised representative") after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your Personal Data for those purposes, or (b) collection and use of Personal Data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional Personal Data and before using your Personal Data for a purpose which has not been notified to you (except where permitted or authorized by law).

3. WITHDRAWING YOUR CONSENT

3.1 The consent that you provide for the collection, use and disclosure of Personal Data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request

us to stop collecting, using and/or disclosing your Personal Data for any or all purposes listed in this Notice or the Online Notice in writing via email to our Data Protection Officer ("**DPO**") at the contact details provided below.

- 3.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we seek to process your request within 10 days of receiving it.
- 3.3 Please note that, depending on the nature and scope of your request to withdraw consent, we may not be in a position to continue providing our services to you. We shall, in such circumstances, notify you before completing the processing of your request should that be the case. Should you decide to cancel your withdrawal of consent, kindly inform us in writing via email to our DPO at the contact details provided below.
- 3.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

4. **CATEGORIES OF PERSONAL DATA WE COLLECT**

- 4.1 Most of the information we collect is in the context of providing financial products or services to institutional clients with their "employees acting in the course of their employment" and is therefore not subject to the PDPA. We do collect Personal Data relating to Singapore residents in other contexts, including for employment and recruiting purposes, marketing activities and interaction with our website.
- 4.2 In the past 12 months, we may have collected and disclosed to third parties for our business purposes the following categories of Personal Information about you in several ways when you use our services, as described below:-
 - 4.2.1 Identifiers: name, email, and address (e.g., Social Security Number);
 - 4.2.2 Personal Data, as defined in the PDPA, contact and financial information;
 - 4.2.3 Commercial Information: products or services purchased and account information;
 - 4.2.4 Internet or other similar network activity: browser type, pages viewed, and links clicked;
 - 4.2.5 Biometric Information: video footage and voiceprints;
 - 4.2.6 Geolocation Data: device location;
 - 4.2.7 Professional or employment-related information: occupation, job title, employment email or prior employer;
 - 4.2.8 Sensory Data: audio recordings of customer care calls, electronic, visual or similar information; and

Inferences are drawn from any of the Personal Information listed above to create a profile about, for example, an Individual's preference and characteristics.

5. **PROTECTION OF PERSONAL DATA**

- 5.1 To safeguard your Personal Data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have appropriate administrative, physical and technical measures in place.
- 5.2 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect

the security of your Personal Data and are constantly reviewing and enhancing our information security measures.

6. PERSONAL DATA RETENTION & STORAGE

6.1 Kin Capital Group only keeps or processes Personal Data for as long as necessary to carry out its business and legal purposes. Personal Data is deleted or anonymized when no longer required for the purposes for which it was collected, in accordance with our Record Retention Policy and Media Sanitization Policy. The specific periods for which we keep information about you vary depending on the nature of the information, why we need it, and whether the Personal Data is de-identified. We also consider the minimum necessary retention period prescribed by applicable laws, recommended by industry standards, and stated in contracts and other legal obligations.

6.2 We may be legally required to retain your Personal Data to:-

6.2.1 comply with legal obligations;

6.2.2 resolve disputes; and

6.2.3 enforce rights.

Storage: We may use data hosting service providers in the U.S., Germany, and Singapore to store information we have about you, and to safeguard your Personal Data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we use administrative, physical and technical measures.

7. PERSONAL DATA SHARED WITH THIRD PARTIES

7.1 We share information we have about you with third parties, service providers, and Kin Capital Group affiliates who assist us with administering our services and advertising on Kin Capital Group, Kin Capital Group affiliate, and third party platforms. We at times partner with other companies to offer products or services jointly; we may share your Personal Data in order to facilitate that offering.

7.2 Any third parties that we share your Personal Data with are limited by law and by contract in their ability to use your Personal Data. Kin Capital Group requires third party service providers acting on our behalf or with whom we share your information to safeguard your Personal Data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we use administrative, physical and technical measures and industry standards and in compliance with this Policy, their privacy and security obligations, and any other appropriate confidentiality and security measures. However, we are not responsible for the privacy and data security practices of third parties outside of Personal Data we receive from or transfer to them. For additional information, please see our Online Privacy Notice.

8. INDIVIDUAL RIGHTS

Kin Capital Group would like to make sure you are fully aware of all of your data protection rights. Every user in Singapore is entitled to the following:-

8.1 The right to access and correct Personal Data: You have the right to request copies of your Personal Data from Kin Capital Group. You have the right to request that Kin Capital Group corrects any information you believe is inaccurate.

8.2 If you wish to make (a) an access request to a copy of the Personal Data which we hold about you or information about the ways we use or disclose your personal data, or (b) a correction request to correct or update any of your Personal Data which we hold about you, you may submit your request in writing via email to our Data Protection Officer ("DPO") at the contact details provided below.

8.3 We will respond to your request as soon as reasonably possible. In general, our response will be within 30 business days. Should we not be able to respond to your

request within 30 business days after receiving your request, we will inform you via email of the time by which we will be able to respond to your request. If we are unable to provide you with any of your Personal Data or to make the correction requested by you, we shall inform you of the reasons we are unable to do so (except where we are not required to do so under the PDPA).

8.4 The right to accuracy of Personal Data: We need your assistance to ensure that your Personal Data is current, complete and accurate. As such, please inform us of any changes or updates in writing via email to our DPO at the contact details provided below.

9. **COOKIES AND OTHER TRACKING TECHNOLOGIES**

9.1 Cookies are small text files that are stored through the browser on your computer or mobile device. Cookies and other trackers serve a variety of functions; they help you navigate between website pages efficiently and may improve the user experience on a website. Cookies vary in duration (they can be "persistent" or "session-based"), and by whom they are served ("first party" cookies are directly from us; "third party" cookies are from other parties on our behalf).

9.2 Kin Capital Group and our service providers use cookies and similar technologies on our website and mobile application to collect information about your browsing activities over time and across different website pages. At Kin Capital Group, we use these tools to:-

9.2.1 administer our services;

9.2.2 analyse services usage and trends;

9.2.3 track how you were referred to our website;

9.2.4 improve the services functionality;

9.2.5 perform analytics and marketing integration; and

9.2.6 deliver advertisements and other marketing offers.

9.3 For further information please review Kin Capital Group's Cookie Notice (available at section 4 of the Online Privacy Notice).

10. **DATA TRANSFER**

Kin Capital Group is a company based in the United States (U.S.) with an affiliate office in Singapore. We use data hosting service providers in the U.S. or Singapore to host the information we collect from or about you. When we transfer your Personal Data outside of Singapore, we will do so in accordance with the PDPA by collecting your consent unless otherwise not required by the PDPA. We generally use consent for the transfer to be made and we will take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

11. **PRIVACY POLICIES OF OTHER WEBSITES**

The Kin Capital Group website and mobile application contain links to other websites. Our privacy notice applies only to our website and mobile application, so if you click on a link to another website, you should review their privacy notice.

12. **CHANGES TO THIS NOTICE**

We may change or update this Singapore PDPA Notice in the future. When we do, we will post the revised version on our website. This notice was last updated and became effective on the date posted at the top of this page.

13. **DATA PROTECTION OFFICER**

If you have any questions about this policy or our privacy practices please contact us. You can write to our DPO at Privacy@kincapgroup.com.