

Mirolab Privacy Policy

Effective Date: September 22, 2024

I. INTRODUCTION

This Mirolab Privacy Policy (the "Privacy Policy") governs the privacy relations between you ("Client" or "you") and any holding company, subsidiary or entity belonging to the Mirolab group of companies ("Mirolab" or "we"), in regard to how we process and protect your personal data as you use the Mirolab Services provided on any Mirolab website, including <https://mirolab.com/> (the "Website"), mobile application(s) and any other official Mirolab communication channel including the content and services made available on or through the same, and any updates, upgrades, and versions thereof, and constitutes a legally binding agreement (the "Agreement") between the parties. We encourage you to seek out and read the Privacy Policy to understand how the information that we collect about you is used and protected.

The Privacy Policy is reviewed regularly to ensure that any new services or updates, as well as any changes to our business model and practices are taken into consideration. We will alert you of material changes by, for example, placing a notice on the Website, the Mirolab Platform and/or by sending you an email. Your continued use of the Mirolab Platform after we make changes is deemed to be acceptance of those changes, so please review the Privacy Policy periodically for updates.

II. DEFINITIONS

Controller means any holding company, subsidiary or entity belonging to the Mirolab group of companies, which may have the capacity of a personal data controller for the purpose of this Privacy Policy;

Mirolab Platform means any Mirolab website, mobile application(s) and any other official Mirolab communication channel, including the content and services made available on or through the same, and any updates, upgrades, and versions thereof;

Personal Data means any information relating to an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier or to one or more factors specific to that natural person;

Privacy Laws means any applicable personal data protection legislation;

Processing means any operation or set of operations which is performed on Personal Data or on sets of Personal Data.

III. INFORMATION WE COLLECT

Mirolab may collect the following types of Personal Data when you visit the Website, register on the Mirolab Platform, use Mirolab Services, and when you interact and communicate with Mirolab through any media or channel:

1. User-provided information:

- Identification information: full name, date, place and/or country of birth, your picture and/or selfie, pictures of your identification document (passport, ID or driver's licence) - front and back; email address, statements of your social status or official position held, sanctions status;

- Contact and communication information: permanent and current address, telephone number, social media profiles, tags and handles, messages in any social platform or communication channel or medium;
- Labour status: occupation, industry, employment status;
- Financial information: bank account number, digital asset wallet, source of funds, source of crypto, transaction history, assets on the Mirolab Platform;
- Other information: any information that you provide to Mirolab at your own discretion.

2. Information we collect automatically

When you visit the Mirolab Platform, we automatically collect the following information:

- Technical information, including the information about your device, information related to the network, software and the network connection with internet, information ensuring your access to your Mirolab Account, type and version of your browser, setting of the time zone, type and version of the browser extensions, operating system and platform, screen resolution, geolocation, font coding;
- Information about your website visits, including full history of your visits from the Unified Resource Locator (URL) to, via or from the Mirolab Platform (including date and hour of such visits); consent given to the Terms and Conditions and the Cookie banner; services which you searched for or have seen; forwarding/initial webpages; files, you have seen on our Mirolab Platform (e.g. HTML pages, graphics, others), time for page answer, uploading mistakes of the webpage, access time for the different pages, information for the interaction of the webpage (like clicking, moving the cursor, others) and the ways for getting out of the page. For additional information please see our Cookies Policy;
- Information generated by using Mirolab Services, including assets on the Mirolab Platform, account status, loyalty level, transaction history, activity log, IP log, geolocation.

3. Information we get from third parties

Mirolab gets information about you from third parties only in the context of account creation and verification, and during the regular due diligence processes, in compliance with its statutory obligations. More information about third parties and our identity verification providers is available in Section VII Third Parties.

Apart from the information above, Mirolab does not request and/or collect any Personal Data about you from third parties.

Please note that if you refuse to provide Personal Data when requested, especially where we need to collect it by law, or under the terms of a contract we have or are looking to enter into with you, we may not be able to perform the relevant contract, including the ability to offer or continue to provide our services to you.

IV. PROCESSING PURPOSES

Mirolab may process your Personal Data only in accordance with the applicable Privacy Laws and this Privacy Policy for the following purposes:

- Identification and verification: to process your application and to provide services to you, to verify your identity (this may also include the use of biometric technologies);
- Transaction services: to accept and process orders, process payments, and communicate with you about orders, services, and promotional offers;
- Recommendations and personalization: to personalise your experience and to allow us to deliver the type of content and service offerings in which you are most interested, including to save your preferences and login information, and to provide customised content;

Continuous improvement of the Mirolab Platform: we use your Personal Data to provide functionalities on, analyse performance, fix errors, and improve the usability and effectiveness of the Mirolab Platform; to maintain the quality and safety of our services; for internal quality control purposes including debugging to identify and repair errors that impair existing intended functionality; to identify and analyse service usage metrics and/or trends (e.g. pages visited, functions used, etc.) and for data analysis, including for research, audit, reporting or other business operation purposes;

Compliance with applicable legislation: in certain cases, we collect and use your Personal Data to comply with Privacy Laws and other local and international applicable industry laws and regulations;

Communication: we use your Personal Data to communicate with you in relation to your access to the Mirolab Platform and for the provision of Mirolab Services, as well as for informing you regarding any changes to Mirolab, our services or our contractual relationship;

Fraud prevention: we process your Personal Data to monitor and detect security incidents, to protect against malicious, deceptive, fraudulent or illegal activity, including money laundering, terrorism financing and other criminal activities and hold those responsible for that activity;

Marketing purposes: we may use your Personal Data to send you marketing communications by email or other agreed forms (including social media campaigns), to ensure you are always kept up-to-date with Mirolab's latest products and services. Any marketing communications shall include an option to unsubscribe from the mailing lists;

Purposes for which we seek your consent: we may also ask for your consent to process your Personal Data for a specific purpose that we communicate to you. In such cases, when you consent to Processing for a specified purpose, you may withdraw your consent at any time, and we will cease Processing your Personal Data for that purpose;

For any other purposes arising from the activities listed above, not prohibited by law.

V. LEGAL BASIS FOR PROCESSING

To achieve the purposes listed above, Mirolab collects and processes your Personal Data in a legitimate and transparent manner under the Privacy Laws, and namely:

- for the purpose of concluding and/or implementing a contract with you;
- to fulfil our obligations under the applicable legislation;
- for the purposes of our legitimate interests, except when your interests and rights take precedence over Mirolab's legitimate interests;
- or based on your consent, where necessary - in the event your consent is required, Personal Data Processing shall commence only after receipt of such consent.

VI. AUTOMATED DECISION MAKING AND PROFILING

Automated decision making is the ability to make decisions by technological means without human involvement. We use automated decision making, for example, because it:

- allows greater consistency and fairness in the decision-making process (e.g., it helps reduce the potential for human error or discrimination);
- enables delivery of decisions within a shorter time frame than a human-based process, improving the efficiency of the process.

Automated decisions can be based on any type of data, for example:

- data provided directly by the Data Subject to Mirolab or its identity verification service providers;
- data observed about the Data Subject (such as location data collected via the Mirolab Platform);
- inferred or derived data (your credit loan-to-value ratio as determined by the Mirolab);

VII. THIRD PARTIES

Mirolab may disclose your Personal Data to other Mirolab companies within the Mirolab group for the purposes of providing our services to you. We have undertaken all necessary measures to ensure that all Mirolab companies handle your Personal Data with the same degree of care. We may also disclose your Personal Data to other selected third parties outside of the Mirolab group – service providers for the performance of our contractual obligations with you, and for other purposes described in this Privacy Policy and the Mirolab Terms of Use.

We may share your Personal Data with the following categories of external third parties:

- Banking and payment network service providers to enable you to upload funds, make and receive payments and withdraw funds; these providers include banks, acquirers, alternative payment providers, card providers and account information service providers;
- Providers of risk assessment and fraud detection, know your customer checks, anti-money laundering and counter-terrorism financing services;
- Online advertising platforms for the purposes of marketing;
- Analytics and search engines providers that assist us in the improvement and optimisation of the Mirolab Platform;
- Cloud service providers who among other things provide us with the necessary infrastructure to safely store and manage your Personal Data;
- Auditors, advisors, legal representatives and similar agents in connection with the advisory services they provide to us, subject to the necessary confidentiality obligations;
- Third parties at any time when we are legally required to disclose your Personal Data and your use of our services, which include but are not limited to competent law enforcement bodies, regulatory, government agencies, courts or other third parties (e.g., the police, the financial supervisory authorities, the tax and social security agencies, as well as courts). Such disclosure shall be subject to our good faith and belief that it is necessary to protect your safety or the safety of others, to protect our rights, to prevent and investigate fraud, or to respond to a government request.

VIII. TRANSFERS

When transferring Personal Data, we are committed to ensuring that the data importer maintains materially similar security measures for storage and Processing of Personal Data as we do. Your Personal Data may be processed, stored and transferred to third parties in the manner and amount as provided in this Privacy Policy, the contract(s) concluded between you and us, and consents you give to us from time to time.

Locations outside your country of residence may be used for Processing (including storage) the data we collect about you. The information we transfer may be shared with our service providers. It may include such processes as Processing a payment, data analysis (including fraud, risk and compliance checks), collecting data on use of our websites and services, for advertising purposes (including behavioural advertising), or offering support for your service or product needs. We take all reasonable action to ensure the safety of your Personal Data in agreement with this Privacy Policy and applicable local and international legislation.

You can find below a non-exhaustive list of the bases of international transfers of Personal Data that may apply depending on you citizenship:

- Any international transfers of European Union (EU) citizens' data outside the EU or European Economic Area (EEA) shall be based on the 2021 European Commission Standard Contractual Clauses, unless the European Commission has issued an Art. 45 GDPR adequacy decision for the importing country. More information on EU/EEA transfers is available on the European Commission's website;
- Any international transfers of United Kingdom (UK) citizens' data outside the UK shall be based on the 2010 European Commission Standard Contractual Clauses, unless the United Kingdom has issued an adequacy regulation for the importing country. More information on UK transfers is available on the Information Commissioner's Office website.

IX. DIRECT MARKETING

Subject to the applicable legislation, Mirolab may from time to time send direct marketing materials promoting its services and/or activities to its existing clients and Website users who have subscribed for updates. You may, at any time, opt out of such communications by utilising the marketing preferences centre provided with each direct marketing communication.

X. DATA SECURITY

Personal Data collected by Mirolab through the Mirolab Platform or otherwise is kept on secure servers, hosted in a cloud environment in the EU. Mirolab is ISO 27001 certified and uses security measures appropriate to the provision of the relevant Mirolab Services, such as reasonable administrative, technical, personnel, and physical measures to protect your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We may use network safeguards such as firewalls and data encryption. In addition, we provide a limited need-to-know access to your Personal Data to those employees, agents, contractors, and other third parties who require access to fulfil their legal obligations. They will only process your Personal Data on our instructions, and they are subject to a duty of confidentiality. Those with access to your Personal Data are carefully screened, periodically re-evaluated, and are required to keep all your Personal Data confidential.

XI. STORAGE AND RETENTION

Personal Data is stored for variable periods of time depending on the category of Personal Data and its usage:

- Some information might be deleted automatically based on specific schedules or via script upon request. If you have opted out of receiving marketing communications, we will hold your email address on our suppression list so that we know you do not want to receive these communications;
- Other data, such as account information, might be retained for a longer period based on the contract you have with us, in accordance with relevant industry standards or guidelines, and in accordance with our legitimate business interests, including prevention of promotion abuse and similar activities;
- We might further retain information for business practises based on our legitimate interest such as product and service improvement, fraud prevention, record-keeping, in the event of complaint or enforcing our legal rights;
- We might have to retain a certain set of Personal Data to comply with our audit, reporting and other legal requirements (including but not limited to the FATF recommendations and the relevant anti-money laundering legislation which oblige us to retain your Personal Data for a period of five (5) years after the end of the relationship between us, which retention period may be further extended in certain cases if so provided by and in accordance with the applicable legislation).

XII. YOUR RIGHTS

Depending on the jurisdiction you access the Mirolab Platform from, your residency, or your citizenship, you may have one or more of the following Data Subject rights. Upon receipt of your requests at the contact details provided below, Mirolab shall reply without undue delay and within the applicable statutory deadlines (as a rule of thumb, thirty (30) days extendable by two further months as per Art. 12 GDPR unless otherwise provided for by other applicable Privacy Laws).

List of Rights:

- Access – you have a right to obtain confirmation as to whether or not Personal Data concerning you is being Processed, and, where that is the case, access to information about the Processing, including the purposes of the Processing, the categories of Personal Data, the recipients of the Personal Data, and its retention period.
- Rectification – you have the right to correct inaccurate Personal Data and/or complete incomplete Personal Data.
- Restrict Processing – you have the right to restrict the Processing of Personal Data, under certain circumstances.

Portability

- you have the right to data portability to:
 - receive a copy of the Personal Data in a structured, commonly used and machine-readable format;
 - transmit the Personal Data to another data controller (including directly by another data controller where possible).

Object to Processing – you have the right to object to Processing for profiling, direct marketing, and statistical, scientific, or historical research purposes.

Object to automated decision making – you have the right to not be subject to automated decision making, including profiling, which has legal or other significant effects on you.

To help protect your privacy and security, we will take reasonable steps to verify your identity before granting access to your Personal Data. We will make reasonable attempts to promptly investigate, comply with, or otherwise respond to your requests as may be required by applicable law. Depending upon the circumstances and the request, we may not be permitted to provide access to Personal Data or otherwise fully comply with your request; for example, producing your information may reveal the identity of someone else. We reserve the right to deny your requests where, at Mirolab's sole discretion, they may be manifestly unfounded or excessive, or otherwise unacceptable under applicable law.

Please note that any request with regards to Personal Data, which is publicly available, should be submitted directly to the third-party supplier of the information.

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is manifestly unfounded or excessive.

XIII. CONTACT US

We value your opinion, if you have any comments or questions about this Privacy Policy, Mirolabs's handling of your Personal Data, a possible Personal Data Breach, or to exercise your rights, please send an email to Mirolabs's Support Service. Mirolab will treat your requests or complaints confidentially.

Mirolabs's Support Service:

support@mirolab.com.

XIV. MISCELLANEOUS

Our services are not directed to persons under the age of 18 (eighteen) years old or of legal age to enter into contractual relations with Mirolab (whichever is later) hereinafter "Children", "Child" and we do not knowingly collect or process the Personal Data of Children. If we learn that we have inadvertently gathered Personal Data from a Child, we will take legally permissible measures to remove that information from our records. Mirolab will require the user to close his or her account and will not allow the use of our services.