

## **SIRE WALLET EXTENSION PRIVACY POLICY**

**Last Updated On: 4 April 2023**

**Please note that this privacy policy will regularly be updated to reflect any change in the way we handle your personal information or any changes in applicable laws.**

We recognise our responsibilities in relation to the collection, holding/storing, processing, use, disclosing and/or transfer of personal data (to the extent we collect any). Your privacy is of utmost importance to us.

This policy (the “**Policy**”) outlines how we collect, process, use, store and disclose your personal data (to the extent we collect any at all). Please take a moment to read about how we collect, process, use, store and/or disclose your personal data so that you know and understand the purposes for which we may collect, process, use, store and/or disclose your personal data. This Policy applies only to the 5ire Wallet Extension ( the “**Wallet**”) and is in conjunction with the Terms of Use available on the 5ire Website.

This Policy supplements but does not supersede nor replace any other consent which you may have previously provided to us, nor does it affect any rights that we may have at law in connection with the collection, processing, use, storing and/or disclosure of your personal data. We may from time to time update this Policy to ensure that this Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, the most updated terms of this Policy shall apply at all times. For the avoidance of doubt, this Policy forms part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions.

The security of your personal data is important to us. At each stage of data collection, processing, use, storing and disclosure, 5ire has in place physical, electronic, administrative, and procedural safeguards to protect the personal data stored with us. However, do note that no transmission of personal data over the internet can be guaranteed to be 100% secure –

accordingly and despite our efforts, 5ire cannot guarantee or warrant the security of any information you transmit to us, or to or from our online services. 5ire shall not have any responsibility or liability for the security of information transmitted via the internet.

This Policy describes how 5ire may collect, process, use, store, disclose, process, and manage your personal data (to the extent we collect any), and applies to any individual's personal data which is in our possession or under our control.

## **1. Personal Data Collected By 5ire**

In general, unless otherwise specified in this Policy, 5ire does not collect any personal data. It uses no third-party analytics or advertising frameworks. 5ire logs no information on you and any of your data is stored on your personal device.

Any communication you send us (including but not limited to in accordance with Section 6 and Section 7 below) and any information you include in such communication shall only be used for quality assurance purposes or to resolve any queries you might have. Such data, may however be retained to meet compliance requirements as explained in Sections 3 and 5.

## **2. Personal Data And The Blockchain**

Blockchain technology, a type of distributed ledger technology (**DLT**), is at the core of our business. Blockchains are decentralised and made up of digitally recorded data in a chain of packages called "blocks". The manner in which these blocks are linked is chronological, meaning that the data is very difficult to alter once recorded. Since the ledger may be distributed all over the world (across several "nodes" which usually replicate the ledger) this means there is no single person making decisions or otherwise administering the system (such as an operator of a cloud computing system), and that there is no centralised place where it is located either.

Accordingly, by design, a blockchain's data cannot be changed or deleted and is said to be "immutable". This may affect your ability to exercise your rights such as your right to erasure ("right to be forgotten"), or your rights to object or restrict processing of your personal data. Data on the blockchain cannot be erased and cannot be changed. Although smart contracts may be used to revoke certain access rights, and some content may be made invisible to others, it is not deleted.

In certain circumstances, in the future, in order to comply with our contractual obligations to you (such as delivery of tokens or provision of other services) it will be necessary to place certain personal data, such as your wallet address, onto the blockchain; this is done through a smart contract and requires you to execute such transactions using your wallet's private key.

The ultimate decision to (a) transact on the blockchain using your wallet address, as well as (b) share the public key relating to your wallet address with anyone (including us) rests with you.

IF YOU WANT TO ENSURE YOUR PRIVACY RIGHTS ARE NOT AFFECTED IN ANY WAY, YOU SHOULD NOT TRANSACT ON BLOCKCHAINS AS CERTAIN RIGHTS MAY NOT BE FULLY AVAILABLE OR EXERCISABLE BY YOU OR US DUE TO THE TECHNOLOGICAL INFRASTRUCTURE OF THE BLOCKCHAIN. IN PARTICULAR THE BLOCKCHAIN IS AVAILABLE TO THE PUBLIC AND ANY PERSONAL DATA SHARED ON THE BLOCKCHAIN WILL BECOME PUBLICLY AVAILABLE.

### **3. Disclosure And Collection Of Personal Data in Compliance with Law**

We may from time to time and in compliance with all applicable laws, rules, regulations and legal orders, , collect or disclose your personal data to any personnel of 5ire, group entities, or to third parties (including without limitation banks, financial institutions, credit card companies, credit bureaus and their respective service providers, companies providing services relating to insurance and/or reinsurance to us, and associations of insurance companies, agents, contractors or third party service providers who provide services to us such as telecommunications, information technology, payment, data processing, storage and archival, and our professional advisers such as our auditors and lawyers, and regulators and authorities), located in any jurisdiction. Please be assured that when we collect or disclose your personal data to such parties, we will disclose only the information that is necessary to comply with such laws, rules, regulations or legal orders and will also require them to ensure that any personal data disclosed to them are kept confidential and secure.

We wish to emphasise that 5ire does not sell personal data to any third parties and we shall remain fully compliant of any duty or obligation of confidentiality imposed on us under the

applicable agreement(s) and/or terms and conditions that govern our relationship with you or our customer or any applicable law.

You are responsible for ensuring that the personal data you provide to us is accurate, complete, and not misleading and that such personal data is kept up to date. To update your personal data, please contact us (please see Section 10 below for contact details). Where you provide us with personal data concerning individuals other than yourself, you are responsible for obtaining all legally required consents from the concerned individuals and you shall retain proof of such consent(s), such proof to be provided to us upon our request.

We may transfer, store, process, use and/or deal with your data in any jurisdiction, and accordingly such personal data may be transferred to computers, servers or hardware located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. 5ire will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy and no transfer of your personal data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information (including without limitation the Standard Contractual Clauses approved by the European Commission).

#### **4. Other Websites**

Our Product may contain links to other websites, products and services (“**sites**”) which may or may not be maintained by 5ire. **This Policy only applies to 5ire’s Wallet Extension and does not extend to any other products, websites (including sub domains), services by 5ire.** Each of 5ire’s products, sites (including sub domains), services may collect different data and have a different Privacy Policy.

When visiting these sites (whether third-party or maintained by 5ire), please read their privacy policies which will apply to your use of those sites.

#### **5. Retention Of Personal Data**

Your data is retained for as long as the purpose for which it was collected remains and until it is no longer necessary for any legal or business purposes. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes. We

may need to retain information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes (e.g., to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators etc).

When we no longer need to use personal information, we will remove it from our systems and records and/or take steps to anonymise it so that you can no longer be identified from it.

## **6. Queries, Access and Withdrawal of Consent and Data**

If you:

- (a) Have queries about our data protection processes and practices;
- (b) Wish to request access to and/or make corrections to your personal data in our possession or under our control; or
- (c) Wish to remove your wallet or account with us

please submit a written request, with supporting documents, (if any) to our legal personnel at: [compliance@5ire.org](mailto:compliance@5ire.org). Our Legal Personnel shall endeavour to respond to you within 30 days of your submission. Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. Our legal rights and remedies are expressly reserved in such an event.

Please also note that we may be constrained by technical limitations in order to meet your requests and shall endeavour to fulfil them to the best of our abilities.

We may charge you a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you upon request.

## **7. Contact Information**

To contact us on any aspect of this Policy or your personal data or to provide any feedback that you may have, please contact our Legal Team at [compliance@5ire.org](mailto:compliance@5ire.org).

## **8. Governing Law and Jurisdiction**

To the fullest extent permitted by the local law in your jurisdiction, this Policy shall be governed and construed in accordance with the laws of the United Arab Emirates.

## **9. Amendments And Updates To 5ire Privacy Policy**

We reserve the right to amend this Policy from time to time to ensure that this Policy is consistent with any developments to the way 5ire uses your personal data or any changes to the laws and regulations applicable to 5ire. We will make available the updated Policy on the 5ire Website. You are encouraged to visit the 5ire Website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection. All communications, transactions, and dealings with us shall be subject to the latest version of this Policy in force at the time.

## **10. For European Union or European Economic Area Residents**

This Section 10 applies if you are an individual located in the European Union or European Economic Area. In such a situation, you have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or 'GDPR'). We explain these below. You can find out more about the GDPR and your rights by accessing the European Commission's website.

### **(a) Right Information and access**

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source) and this Policy intends to provide the information. Of course, if you have any further questions, you can contact us on the above details.

### **(b) Right to rectification**

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing of that information. The accuracy of your information is important to us. If you do not want us to use your personal information in the manner set out in this Policy or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your personal information, please contact us at the above details.

(c) Right to erasure (right to be "forgotten")

You have the general right to request the erasure of your personal information in the following circumstances: (i) the personal information is no longer necessary for the purpose for which it was collected; (ii) you withdraw your consent to consent based processing and no other legal justification for processing applies; (iii) you object to processing for direct marketing purposes; (iv) we unlawfully processed your personal information; and (v) erasure is required to comply with a legal obligation that applies to us. However, when interacting with the blockchain we may not be able to ensure that your personal data is deleted. This is because the blockchain is a public decentralised network and blockchain technology does not generally allow for data to be deleted and your right to erasure may not be able to be fully enforced. In these circumstances we will only be able to ensure that all personal data that is held by us is permanently deleted.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for: (1) exercising the right of freedom of expression and information; (2) complying with a legal obligation under EU or other applicable law; (3) the performance of a task carried out in the public interest; (4) archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or (5) the establishment, exercise, or defence of legal claims.

(d) Right to restrict processing and right to object to processing

You have a right to restrict processing of your personal information, such as where: (i) you contest the accuracy of the personal information; (ii) where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information; (iii) we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defence of legal claims.

You also have the right to object to processing of your personal information under certain circumstances, such as where the processing is based on your consent, and you withdraw that consent. This may impact the services we can provide, and we will explain this to you if you decide to exercise this right.

However, when interacting with the blockchain, as it is a public decentralised network, we will likely not be able to prevent external parties from processing any personal data which has been written onto the blockchain. In these circumstances we will use our reasonable endeavours to ensure that all processing of personal data held by us is restricted, notwithstanding this, your right to restrict processing may not be able to be fully enforced.

(e) Right to data portability

Where the legal basis for our processing is your consent or the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

(f) Right to freedom from automated decision-making

We do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

(g) Right to object to direct marketing ("opting out")

You have a choice about whether or not you wish to receive information from us. We will not contact you for marketing purposes unless: (i) you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above); or (ii) you have otherwise given your prior consent (such as when you download one of our guides).

You can change your marketing preferences at any time by contacting us on the above details. On each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your personal data for marketing purposes



(known as ‘opting-out’) by clicking on the ‘unsubscribe’ button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your data. You may also opt-out at any time by contacting us on the below details.

Please note that any administrative or service-related communications (to offer our services or notify you of an update to this Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our product or as part of a contractual relationship we may have with you.

(h) Right to request access

You also have a right to access information we hold about you. We are happy to provide you with details of your personal information that we hold or process. To protect your personal information, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

(i) Right to withdraw consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details.

If you believe that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your residence, your place of work or the place of the alleged infringement. You may exercise any of your rights in relation to your personal data by contacting our Legal Personnel at: [compliance@5ire.org](mailto:compliance@5ire.org).

## **11. Other Terms**

This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, processing, use, storing and disclosure of your personal data by us. We may revise this Policy from time to time without any prior notice.

You may determine if any such revision has taken place by referring to the date on which this Policy was last updated.