

## **PRIVACY POLICY**

### **UANT Inc.**

Edition from 18<sup>th</sup> of March 2025

- 1.1. **UANT Inc.**, a legal entity established under the laws of the Hong Kong, represented by the Director Yin Xin on the basis of the Charter (hereinafter referred to as the «Operator») has developed this Privacy Policy (hereinafter referred to as the «Policy») in accordance with the requirements of the provisions of current legislation and applies to all personal data that the Operator may receive from the personal data subject (hereinafter referred to as the «User»). The Policy defines the procedure for processing and protecting information about Users using the Site's services.
- 1.2. The current version of this Policy is posted on the website hosted on the domain name <https://pintopay.me/> ( next - the «Site»).
- 1.3. By using the Operator's services, the User accepts this Policy by adhering to its terms and conditions as a whole, the User also declares and guarantees that he has all legal rights to provide the Operator with consent to the collection, use, disclosure and/or processing of his Personal Data, as described in this Policy.

#### **2. THE LIST OF PERSONAL DATA PROCESSED.**

- 2.1. The personal data that you can provide to us during the registration process may also include, without limitation:
  - 2.1.1. Full surname, first name, patronymic.
  - 2.1.2. Type of identity document (for example, passport).
  - 2.1.3. The number of the identity document (for example, passport number).
  - 2.1.4. Gender.
  - 2.1.5. Date of birth.
  - 2.1.6. Place of birth.
  - 2.1.7. Nationality.
  - 2.1.8. Residential address.
  - 2.1.9. Country/state of residence.
  - 2.1.10. The purpose of opening an account.
  - 2.1.11. Sources of income.
  - 2.1.12. The nature and details of the business/occupation/job.
  - 2.1.13. Credit history.

- 2.1.14. Contact phone number.
- 2.1.15. E-mail address.
- 2.1.16. Transaction and expense history.
- 2.1.17. Information about the bank account.
- 2.1.18. The blockchain address.
- 2.1.19. Location data.
- 2.1.20. User name/phone number during communication via messengers (for example Telegram).
- 2.1.21. Additional personal data or documentation at the discretion of the Operator.

### **3. USE OF PERSONAL DATA.**

- 3.1. The Operator may use the collected Personal Data for the following purposes:
  - 3.1.1. Make decisions regarding the provision or continuation of the provision of services to the User.
  - 3.1.2. For the administration, operation, provision, improvement and personalization of Services.
  - 3.1.3. To process the User's payments and transactions, as well as to provide the User with statements, invoices, receipts and other relevant information related to the Services.
  - 3.1.4. To monitor and register the use of the Services and communicate with the User (including for the purpose of investigating and preventing fraud).
  - 3.1.5. To detect, prevent and solve technical problems.
  - 3.1.6. For risk assessment and data analysis (including data processing, anti-money laundering and credit analysis), internal management and internal/external audit.
  - 3.1.7. To contact the User regarding events, services and other services offered by the Operator or its affiliated companies.
  - 3.1.8. To conduct marketing research, surveys, promotions and contests, as well as to analyze the preferences, interests and behavior of the User in relation to the services.
  - 3.1.9. To comply with any applicable legal, regulatory and regulatory requirements (including anti-money laundering obligations and tax obligations applicable to us).
  - 3.1.10. To ensure compliance with or protection of the rights or property of the Operator, its affiliates and other Users.
  - 3.1.11. Fulfilling any other purposes described during data collection.

#### **4. TRANSFER OF PERSONAL DATA.**

- 4.1. The Operator has the right to transfer the User's personal data to the following persons for the above purposes:
  - 4.1.1. To third-party service providers.
  - 4.1.2. Employees of the Operator and its affiliates.
  - 4.1.3. Professional consultants of the Operator and its subsidiaries.
  - 4.1.4. Any person or organization with whom the Operator enters into a legal relationship or in which the Operator participates for the purpose of marketing, advertising or promoting services, for example, social media platforms, online platforms or third-party websites.
  - 4.1.5. Any person to whom the Operator is obliged to disclose information in accordance with applicable law or request.
  - 4.1.6. Any person or organization to whom the User authorizes the receipt of his personal data.
  - 4.1.7. Any actual or alleged legal successor or recipient of the Operator's business and/or its affiliates.
- 4.2. The Operator also has the right to transfer generalized or anonymized personal data to the above-mentioned persons in order to facilitate the administration, operation, provision and improvement of services.

#### **5. STORAGE OF PERSONAL DATA.**

- 5.1. The User's personal data may be transferred and stored on computers located outside the state, province, country or other government jurisdiction in which the User resides, where data protection laws may differ from the laws of the User's jurisdiction. The Operator has the right to transfer data, including Personal Data, outside the User's jurisdiction and process it there. The User's consent to this Policy and the provision of such information by the User means the User's consent to such transfer.
- 5.2. The Operator takes reasonable measures to ensure the safe handling of the User's personal data in accordance with this Policy, and no transfer of the User's Personal Data will be carried out to the organization or country unless appropriate control measures are taken, including the security of the User's personal data and other personal information.

#### **6. THE PERIOD OF STORAGE OF PERSONAL DATA.**

- 6.1. The Operator stores the User's personal data only for the time necessary for the purposes set out in this Privacy Policy. The Operator stores and uses the User's personal data to the extent necessary to comply with the Operator's legal obligations, resolve disputes and ensure compliance with our legal agreements and Operator policies. By accessing/using the Services, the User gives the Operator consent to the storage of his Personal Data.

#### **7. MARKETING COMMUNICATIONS.**

- 7.1. The Operator has the right to inform the User about news, promotions, as well as to transmit information regarding the services provided by the Operator. The Operator has the right to transfer personal data to its affiliates in order to send marketing messages. The Operator and its affiliates have the right to send such marketing messages to the User only if they have previously received explicit consent from the User.

- 7.2. The User has the right to unsubscribe from the promotional mailing list by sending a message to the e-mail address [corp@pintopay.me](mailto:corp@pintopay.me): with the heading «UNSUBSCRIBE FROM THE PROMOTIONAL MAILING LIST».
- 7.3. The Operator may communicate with the User through chatbots, including but not limited to Telegram. These chatbots may be used to provide information, support, or other services as part of the Operator's interaction with the User. The User acknowledges and agrees that such communication may be conducted via automated systems.
- 7.4. In order to ensure the quality of services, the Operator has the right to send operational notifications to the User, which the User does not have the right to refuse.

## **8. COOKIES.**

- 8.1. When accessing the Site, the Operator has the right to use mainly small fragments of data that are stored on the User's computer, tablet, mobile phone or other device and allow recording certain information during any visit to the Site, interaction with services, tools, as well as sending and receiving messages, in order to identify the User regardless of the device used («Cookies»).
- 8.2. Some browsers have a «do not track» feature that allows the User to inform websites that they do not allow their online activities to be tracked.
- 8.3. The Operator uses Cookies to achieve the following objectives:
  - 8.3.1. To save information about the User during the use of the Site.
  - 8.3.2. For the operation of individual sections/pages of the Site (where the use of cookies is extremely necessary).
  - 8.3.3. To improve the usability of the Site and navigation on it.
  - 8.3.4. To improve the interaction between the Site and Users.
  - 8.3.5. To improve the quality of service and ensure maximum User convenience and comfort when using the Site.
- 8.4. The Operator does not use Cookies to identify Users, but solely to determine how Users use the Site.
- 8.5. Through Cookies, the Operator can collect the following information about Users:
  - 8.5.1. IP address, browser type and device from which you log in to the Site;
  - 8.5.2. Operating system and Internet Service Provider information;
  - 8.5.3. Information about the country from which you are logging in;
  - 8.5.4. Date and time of the Site visit.

## **9. TYPES OF COOKIES USED.**

- 9.1. According to generally accepted classifications, at the moment there are the following types of cookies:
  - 9.1.1. **Technical** cookies. They are necessary for the smooth and reliable functioning of the Site. Disabling this type of cookie may restrict the User's access to certain functionality of the Site.
  - 9.1.2. **Session** cookies. They are temporary and store information about the User's activity in the browser during one session (i.e., until the User closes such a browser).
  - 9.1.3. **Permanent** cookies. They are stored in the User's device memory for a certain period of time and are responsible for the User's personal preferences set in the browser (for example, the browser's language settings).
  - 9.1.4. **Statistical** cookies. They are needed to track the pages / sections of the Site visited by the User, as well as to identify possible errors in the operation of the Site. The information collected about Users by this type of cookie is anonymous and is necessary for the effective maintenance and updating of the Site, as well as for providing targeted content to the User.
  - 9.1.5. **Behavioral** cookies. They are needed to collect information about the User's search queries and preferences for conducting marketing and/or other market research in order to subsequently provide personalized marketing and advertising content to the User.
  - 9.1.6. **Third parties and their** cookies. They are needed for the following purposes:
    - 9.1.6.1. Analytical platforms collect information about Site traffic by Users, create a portrait of the User, as well as analyze the effectiveness of the Site and marketing strategy;
    - 9.1.6.2. Providing personalized advertising and/or marketing content to the User on the Website and/or on the websites of third parties with the help of third parties (marketing platforms or agencies).
- 9.2. The Website uses the following cookies belonging to the Operator:
- 9.3. The Website may use the following cookies belonging to third parties in its work: tagmanager.google.com.

## **10. DELETING/DISABLING COOKIES.**

- 10.1. Each User can disable Cookies on the device from which they log in to the Site at any time and/or delete previously downloaded Cookies on the device. If the User does not wish to disable Cookies and/or delete previously downloaded Cookies, no additional actions are required from the User in this case.
- 10.2. Please note that the Operator does everything possible to ensure that the use of the Site is accessible to the User without downloading any Cookies. However, the Operator does not guarantee that such cookies will not be downloaded at all, due to the technical and functional features of the Site.
- 10.3. Cookies can be stored on the User's device from several hours to several days or years, depending on the type of Cookies downloaded/used.

## 11. TERMINOLOGY AND ABBREVIATIONS

- 11.1. **Personal Data** — any information relating to a "data subject," i.e., an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.
- 11.2. **Chatbot** – an automated software application designed to simulate human-like conversations with users (i.e. @mypintopaytest\_bot, @mypintopaysupportbot, @PintopayVIPsupportbot).
- 11.3. **Data Subject** — a natural person to whom the information constituting personal data relates.
- 11.4. **User** — a natural person who visits the Website, uses its functionality, services, or features provided on the Website.
- 11.5. **Processing of Personal Data** — any operation or set of operations performed on personal data, whether or not by automated means, including collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- 11.6. **Profiling** — any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects of a natural person, in particular to analyze or predict aspects concerning that person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, or location.
- 11.7. **Data System** — an organized set of personal data accessible according to specific criteria, regardless of whether this set is centralized, decentralized, or distributed functionally or geographically.
- 11.8. **Data Subject's Consent** — a freely given, specific, informed, and unambiguous indication of the data subject's wishes, by which the data subject, by a statement or clear affirmative action, signifies agreement to the processing of their personal data.
- 11.9. **Automated Processing of Personal Data** — the processing of data using technologies that allow the use of software or other automated means. Such processes enable operations on data with minimal human involvement.
- 11.10. **Dissemination of Personal Data** — actions aimed at transferring personal data to an indefinite number of persons, including their publication in open access or through other mass communication means.
- 11.11. **Provision of Personal Data** — the transfer of personal data to specific individuals or organizations for use in specific purposes and within established limitations.

- 11.12. **Blocking of Personal Data** — the temporary suspension of data processing, where the possibility of their use or modification is excluded until certain conditions are met, such as the resolution of the reason for blocking.
- 11.13. **Use of Personal Data** — the application of collected information about a data subject to achieve specific purposes, such as fulfilling obligations, conducting analytics, providing services, or other actions within the legal framework.
- 11.14. **Anonymization of Personal Data** — the processing of personal data in such a way that the data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is stored separately and technical and organizational measures are in place to ensure that the data cannot be attributed to an identified or identifiable natural person.
- 11.15. **Destruction of Personal Data** — the complete and irreversible deletion of information, making it impossible to restore or use the data in the future.
- 11.16. **User Agreement** — the Agreement posted on the Internet at <https://pintopay.me/>, which constitutes an offer by the Company to enter into an agreement with any third party using the Website under the terms set forth in the User Agreement.
- 11.17. **Cookies** — Data that is automatically transmitted to the Company during the use of the Website through software installed on the User's device, including IP address, geographical location, information about the browser and operating system of the User's device, technical characteristics of the hardware and software used by the User, and the date and time of access to the Website. Cookies can be permanent (stored on the computer until the User deletes them) or temporary (session cookies, which are stored only until the browser is closed). Additionally, cookies are divided into first-party (set directly by the visited Website) and third-party (set by other websites).
- 11.18. **IP Address** — a unique network address of a device used to connect to the internet, which allows the identification of the device's location within the network and facilitates communication between devices.
- 11.19. **Messenger** – a digital communication platform or application that enables users to exchange messages, including text, voice, images, and videos, in real-time or asynchronously. Messengers can function as standalone apps or be integrated into social media platforms, providing convenient and instant communication between individuals or groups. Examples include Telegram, WhatsApp, Facebook Messenger, and others.

## 12. OPERATOR'S DETAILS.

### UANT INC.

Legal address: FLAT B, 5th Floor, Gaylord Commercial Building, 114-118 Lockhart Road, Wan Chai, Hong Kong.

Reg. №: 77341227