

PRIVACY POLICY

Version 30.09 V1, published on September 30, 2025.

If you do not agree to provide your personal data or do not agree with this Privacy Policy, you must immediately cease using the Application and Services. *If you have already provided your data, you can request that it be deleted in accordance with the Privacy Policy.*

The Privacy Policy (hereinafter referred to as the Privacy Policy) applies to the personal data of users (hereinafter referred to as the User, you, your) that amoka LLP (amoka) (Resident of the Republic of Kazakhstan, BIN 231240013791) (hereinafter referred to as the Rights Holder, we, us, our) processes **through the amokabox Application**.

The amokabox Application, amokabox, and Application is software (a set of software modules) **owned and operated by the Rights Holder** that allows the User to organize the purchase, sale, receipt, sending, and storage of Crypto Assets, as well as the ability to track the transfer of ownership and otherwise manage Crypto Assets.

The purpose of the amokabox Application is to provide the User with a convenient interface for accessing services and features offered by our partners. Partners of amoka LLP include: operators of regulated crypto platforms authorized to provide services related to the creation and release of Crypto Assets, including services for the promotion of Crypto Assets, consulting, and other related services; activities of the crypto platform operator; and other activities using Crypto Assets within their licenses/permissions. As part of amoka LLP's activities, the list of partners may change and also include banks and other regulated credit and financial institutions that provide financial services. Hereinafter, partner services and features are referred to as "**Services**", (including Partners' crypto platforms through which these services are provided). This Application is designed to simplify access to the process of buying, selling, and exchanging Crypto Assets, as well as integrating with other financial services.

Partners process personal data on their own legal grounds in accordance with their privacy policies.

User, personal data subject, you are terms that refer to an individual who uses **the amokabox Application**.

The Privacy Policy is an integral part of the User Agreement.

Terms used in the Privacy Policy with a capital letter shall have the meaning as defined in the User Agreement.

This document is developed in accordance with the Law of the Republic of Kazakhstan dated 21 May 2013 No. 94-V "On Personal Data and Its Protection" (hereinafter referred to as the Law) taking into account the specifics of the legislation of the Russian Federation (when processing personal data of citizens of the Russian Federation), as well as in connection with the current legislation of the Republic of Kazakhstan.

AML/CFT legislation refers to applicable laws on the prevention of money laundering and terrorist financing, in particular, the Law of the Republic of Kazakhstan "On Counteracting the Legalization (Laundering) of Proceeds from Crime and the Financing of Terrorism" and the Federal Law "On Counteracting the Legalization (Laundering) of Proceeds from Crime and the Financing of Terrorism" dated August 7 No. 115-FZ.

Personal data is information related to a specific or identifiable personal data subject, stored in electronic or other form.

The **processing of personal data** is any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Cross-border transfer of personal data is the transfer of personal data to the territory of foreign states.

An **account** is a User account in the Application created during registration that provides the ability to use Application Features and belongs to a specific User.

Application Features are the set of Application functions available to the User.

- **WHAT DATA WE PROCESS, FOR WHAT PURPOSES, AND ON WHAT GROUNDS**

LEGAL BASIS FOR PROCESSING

We process personal data on the following legal grounds:

- performance of a contract (including entering into and executing the User Agreement, providing access to the Application and Partner Services);
- compliance with legal obligations, including requirements of AML/CFT legislation and other applicable laws;
- consent of the User, where such consent is required by applicable law.

1.1. When you create an Account, you provide us with the following data:

| Category of data | List of data | Purposes of processing |
|---------------------|--|--|
| Account data | Name, email address, mobile phone number, country of citizenship | <ul style="list-style-type: none"> • Identifying you as a User of the Application • Creating and maintaining an Account in the amokabox Application and Partner Services • Providing access to the Features of the amokabox Application |

- In the identification and verification process, you must provide the following data:

| Category of data | List of data | Purposes of processing |
|--------------------------------------|--|---|
| Identification data | Last name, first name, patronymic (if available); full name in the Latin alphabet; date and place of birth; citizenship; country of registration; gender, place of birth Registration data regarding your place of residence and/or place of registration (country and address) | <ul style="list-style-type: none"> • Identifying and verifying the User to comply with the requirements of AML/CFT legislation and conducting a risk assessment • Executing the contract in terms of providing access to Partner Services |
| Data of the identity document | Document type; series and number (if available); date of issue; expiration date; issuing authority; identification number and other details of the identity document and/or other document used for identification | - Identifying and verifying the User to comply with the requirements of AML/CFT legislation and conducting a risk assessment |
| Biometric data | Photographs (selfies, selfies with a document, a photo of a document next to face), video recordings, audio recordings, liveness check results, digital templates | - Identifying and verifying the User to comply with the requirements of AML/CFT legislation and conducting a risk assessment |

This data is required as part of internal procedures approved by our Partners, and we immediately transfer this data to them for the identification and verification procedure. When using Partner Services (for example, crypto platforms), we transfer your personal data to the respective Partner. From the moment of transfer, the Partner becomes an independent operator of personal data and processes it based on their own purposes and rules established by legislation and their personal data processing policy.

- When you use the Application, we may process data on how you use the Application, specifically displaying your operations related to the purchase, sale, exchange, receipt, sending, and storage of Crypto Assets, balance updates, as well as other operations implemented exclusively through the Partner infrastructure and Partner Services but displayed in the Application.

| Category of data | List of data | Purposes of processing |
|------------------|--------------|------------------------|
|------------------|--------------|------------------------|

| | | |
|--|---|--|
| <p>User data for payment operations</p> | <ul style="list-style-type: none"> • Current balance for specified assets, - information in the invoice (the user's full name, transaction total, User ID), • Obtaining the User's crypto address from the Partner • Obtaining current operation limits - Initiating fund withdrawals to the bank with subsequent direct confirmation by the User through 2FA (OTP code), - Initiating Crypto Asset withdrawals to the blockchain with subsequent direct confirmation by the User through 2FA (OTP code), - Exchanging according to specified pairs, - Clarifying the status of an operation initiated by the User (invoice, exchange, withdrawal) • Blockchain address | <p>Executing the contract, specifically providing a comfortable interface:</p> <ul style="list-style-type: none"> - Displaying information on payment operations initiated by the User through the amokabox Application interface |
|--|---|--|

- If you contact us for technical support or any other issue, we process all the information you provide in your message. This data is processed in order to resolve the issue you have raised.

The data listed in sections 1.1, 1.2, 1.3, and 1.4 is processed based on the contract (to execute the contract concluded with you (User Agreement)) or to conclude it; in addition, the data listed in section 1.2 is processed by us based on the AML/CFT Legislation to properly verify clients by financial monitoring entities when concluding and executing the contract, which we must also follow.

- We may collect data about the device you use to access the Application, including the device model, operating system and version, unique device identifiers, and mobile network information.

| Category of data | List of data | Purposes of processing |
|------------------------------|--|---|
| <p>Technical data</p> | <p>Metadata, IP addresses, browser and OS information, device model, device identifier, language used on the device, data transmission channel</p> | <ul style="list-style-type: none"> • Technical support to operate the amokabox Application; • Statistical analysis; • Enhancing security and improving user experience |

Such data is processed based on the contract (to execute the contract concluded with you (User Agreement)): based on this information, we gain the ability to effectively provide services to you (maintain and monitor the proper operation of the Application, correct any errors in its operation, and improve the quality of services and your user interface).

COOKIES AND TRACKING TECHNOLOGIES

We may use cookies and similar technologies to operate the Application, analyze usage, and improve user experience. You can control cookies through your browser settings.

2. PROTECTION OF PERSONAL DATA

2.1. We take necessary legal, organizational, and technical measures to protect personal data.

All information in the Services is transmitted in a secure form using end-to-end encryption algorithms. Access to information systems is granted only to servers and services whose IP addresses are predetermined and whitelisted, which eliminates the possibility of establishing connections from unauthorized nodes and reduces the risk of unauthorized access. Whitelists are regularly updated in accordance with infrastructure changes.

All critical requests related to the processing and transmission of personal data are additionally signed using special algorithms (e.g., HMAC or a digital signature).

The signature is generated using a secret key and verified on the receiving server's side.

2.2. When processing personal data of Users who are citizens of the Russian Federation, the recording, systematization, accumulation, storage, clarification (updating, modification), and retrieval of personal data are ensured using databases located on the territory of the Russian Federation.

3. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

3.1. To fulfill the agreement between you and us, to use the Partner Services, or in the case of your consent, we may transfer personal data to our Partners and third-party services, including through their cross-border transfer (as described in section 6).

3.2. Regardless of the legal basis for the transfer (for example, the fulfillment of the agreement concluded between you and us, or your consent, or based on legislation), we transfer your data based on agreements on the processing/exchange of personal data between us and the Partners.

3.2.1 All financial transactions are carried out directly through the Services of our Partners: crypto platforms, crypto exchanges, credit and financial organizations, payment systems/institutions, and other entities ensuring the operability of the Service. For the purposes of fulfilling the contract concluded between you and us, specifically, of ensuring the operability of the Services and compliance with AML/CFT Legislation, we transfer your data to the following entities (our Partners):

- Cryptocurrency exchanges located in foreign countries that provide adequate protection of personal data subjects' rights.
- Credit institutions located in foreign countries that provide adequate protection of personal data subjects' rights.
- Payment systems located in foreign countries that provide adequate protection of personal data subjects' rights.

3.2.2 In some cases, we may process your data on behalf of cryptocurrency exchanges, credit institutions, and payment systems. In these cases, we will provide information on all aspects of personal data processing carried out on behalf of the specified entities before the processing starts.

- Some of your personal data is also processed by third-party services on our behalf (for example, those providing the possibility for you to undergo identification and verification required by Partners before using their Services and by the AML/CFT Legislation: SUMSUB TECH LTD (Cyprus), PO Kabutek LLC (Russian Federation) or similar). Please note that third-party services process your data using their internal procedures and in accordance with the requirements of applicable legislation.

When entrusting the processing of your data to third-party services, we require them to implement legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

- We also have the right to transfer your personal data when we have reason to believe that (a) we are obliged to do so by law, or (b) it is necessary to detect, prevent, and suppress cases of fraud and other illegal activities.

Who else has access to your data

Our employees may have access to data about Application Users in the performance of their official duties.

4. METHODS OF PROCESSING YOUR PERSONAL DATA

4.1. We have the right to perform any actions or a combination of actions with your personal data, including the collection, systematization, storage, modification, use, anonymization, blocking, distribution, provision, and/or deletion of personal data in accordance with the Privacy Policy.

4.2. We do not sell your personal data, meaning we do not exchange it for monetary compensation.

5. HOW YOU CAN MANAGE YOUR PERSONAL DATA

5.1.1 You have the following rights regarding personal data:

- The right to information and access to your personal data (you have the right to request information about what personal data we have about you, how we use it, access your personal data and obtain a copy of it, including in a structured, portable format)
- The right to correct your personal data (if you believe that your personal data is inaccurate, you can ask us to correct it). In certain cases, you will need to undergo verification and identification again
- The right to request the restriction of the processing of your personal data (in this case, we will only be able to store your personal data)
- The right to request the deletion of your personal data. Please note that the deletion of some personal data may be prohibited by applicable law to us or third-party services, as a result of which we will be forced to refuse you
- The right to object to the processing of personal data (in some cases, you have the right to object to the processing of your personal data, for example, if we process them based on legitimate interest)
- The right to withdraw your consent if we process your personal data based on your consent
- Not to be subject to decisions based solely on automated processing
- The right to file a complaint with supervisory authorities if you believe that your rights have been violated.

5.1.2 To exercise your rights, you can send us a request by email to DPO@amokabox.com, which will be processed as soon as possible in accordance with applicable law.

5.2 Due to the specifics of legal regulation of personal data processing by the legislation of the Russian Federation, we, as an operator, process personal data taking into account the following.

5.2.1 In addition to the information mentioned above, the following information regarding the processing of personal data is provided to citizens of the Russian Federation upon their request:

- Methods of processing personal data
- Information about persons (excluding the operator's employees) who have access to personal data or to whom personal data may be disclosed based on a contract with the operator
- Terms of personal data processing, including storage periods
- Information about the completed or intended transfer of personal data outside the Russian Federation
- Information on the methods of fulfilling the obligations by the operator as specified in the Privacy Policy, as well as the established legal, organizational, and technical measures applied during the processing of personal data.

The specified information will be provided to you within ten working days from the moment of the request or receipt of our inquiry. The specified period may be extended if we send you a message with justifications indicating the reasons for extending the period for providing the requested information.

- If an inaccuracy in personal data or its unlawful processing is found, we undertake to ensure the immediate deletion or modification of such personal data. We undertake to ensure the relevance of personal data within seven business days from the day we are presented with documents confirming the accuracy of personal data. We undertake to ensure the destruction of personal data if, within ten business days from the moment the unlawful processing of personal data is identified, the legality of such processing is not ensured.
- In addition to the rights established by the Law, the data subject also has the right to request explanations about the procedure for making decisions based solely on the automated processing of personal data, the possible legal repercussions of such decisions, to be given the opportunity to object to such decisions, as well as to receive explanations on the procedure for the data subject to protect their rights and legitimate interests.

- The data subject's objections are considered by the party responsible for exercising internal control over the processing of personal data within thirty calendar days of receiving the request.
- We undertake to notify the authorized body for the protection of the rights of personal data subjects of the Russian Federation within twenty-four hours from the moment that the unlawful or accidental transfer of personal data that resulted in the violation of the rights of personal data subjects is identified. Such a Notification from us will contain information about the incident that occurred, the supposed reasons that led to the violation of the rights of personal data subjects, the alleged harm caused to the rights of personal data subjects, the measures taken to eliminate the consequences of the respective incident, as well as information about the party authorized by us to interact with the authorized body. In addition, within seventy-two hours, the authorized body shall be notified of the results of the internal investigation of the identified incident, as well as of information about the parties whose actions caused the identified incident (if available).
- If you want to file a complaint related to the processing of your personal data, please contact us first at DPO@amokabox.com, and we will try to process your request as soon as possible.
- Despite the fact that you have the rights listed in this section, please bear in mind that the implementation of some of them may cause the Application to operate incorrectly or even lead to a situation where it is impossible to use the Application's Features, depending on the purposes for which such data was used or intended to be used.

6 CROSS-BORDER DATA TRANSFER

6.1 We generally carry out the cross-border transfer of personal data only to the territory of a foreign state that ensures reliable protection of Users' rights.

6.2 You acknowledge that some of our Partners or third-party services to whom we provide your data may be located in countries where the legislation regarding personal data protection may differ from your home country's and provide a lower (or even inadequate) level of protection. By accepting the terms of the Privacy Policy, you are aware of the risks of such a transfer.

6.3 Just as other companies do, we resort to the services of third-party services, which, among other things, help us process personal data, based on a contract with them. The cross-border transfer of personal data is carried out by us for the purposes of fulfilling contractual relations, identification, and verification to the following entities:

| The list of companies to which User data is transferred | Location | Purpose of data transfer | Basis for transfer |
|---|---------------------|---|--------------------|
| Partners (cryptocurrency exchanges) | Republic of Belarus | Execution of the contract for providing access to Partner Services | Contract |
| Organization performing the KYC procedure | Cyprus | Performing identification and verification, checking the authenticity of documents, compliance with AML/CTF Legislation | Contract |
| Organization performing User support services | USA | User support via the builtin chat | Contract |

7. DATA STORAGE

7.1. We store your personal data only for the time necessary to fulfill the purposes for which such personal data was obtained, and delete or depersonalize it (in such a way that it cannot be linked to a specific individual, i.e., such data is not considered personal data) after such purposes have been achieved. Generally, we do this within no more than 30 days from the date the purpose of the data processing is achieved.

7.2 If you send us a request to delete/deactivate your Account, then within the timeframe and in the manner specified in the User Agreement, we:

- Delete or depersonalize your personal data
- Send a request to third-party services and our Partners (if applicable) to delete your personal data c) Notify you of the steps taken

7.3 If you submit a request to cease the processing of personal data, we undertake not to process the relevant personal data in any way other than to store it during the retention period. However, storage will be carried out for the periods established by us and justified by legal requirements.

Personal data used for the purpose of generating an invoice is stored for 1 month from the moment the document was issued to the user. Personal data used for the purpose of generating an invoice is stored for 1 month from the moment the document was issued to the user.

7.5 Personal data used for other purposes is stored for 5 years from the moment actions related to the use of personal data are performed. For example, personal data used for providing technical support. In addition, the legislation of the Republic of Kazakhstan establishes mandatory retention periods for documents generated in the course of business. Generally, for the documents of the Right Holder, such a period is at least 5 years after the end of the reporting period.

7.6. Please note that we may retain certain personal data and other information for a longer period if necessary to comply with legal obligations, resolve disputes, and ensure the enforcement of our agreements.

8. AMENDMENTS

8.1. We may make amendments to the Privacy Policy at any time and will notify you of changes by indicating the last update date of the Privacy Policy, or we will request your consent for such amendments (if required by applicable law).

8.2. Any amendments take effect from the moment they are published or from the moment your consent is obtained (if required by applicable law). If such amendments will significantly negatively affect your rights, we will notify you of such amendments in advance.

8.3. If you do not agree with the current terms of personal data processing, including any amendments, you must stop using the Application. If necessary, contact us at support@amokabox.com to resolve issues related to you stopping your use of the Application, including deactivating your Account and withdrawing funds.

9. CONSENT

9.1 We do not obtain your consent when it is not required.

We process User personal data without their consent:

- Based on the contract concluded (being concluded) with the User for the purpose of performing actions established by this contract or for implementing steps preceding the conclusion of the contract on behalf of the User
- When implementing AML/CFT legislation
- In cases where the processing of personal data is necessary to perform duties (powers) provided for by legislative acts
- In cases where legislative acts explicitly provide for the processing of personal data without the consent of the personal data subject.

CHILDREN

The Application is not intended for individuals under the age of 18. We do not knowingly collect personal data from minors.

CONTACT ADDRESS

For questions regarding the protection of your personal data, you can contact us by email at DPO@amokabox.com

amoka Limited Liability Partnership, located in the Republic of Kazakhstan, at Seidolla Baiterekov **Street, building 55**, Akbulak Microdistrict, Alatau District, Almaty, Kazakhstan, 050038