

# DATA PRIVACY POLICY

Algoreg Tech S.A.S. (hereafter “ALGOREG”) is a Luxembourg company registered under Number B248945 and having its principal office at 1, Op de Leemen, L-5846 Fentange, Luxembourg, LUXEMBOURG.

## I. Recitals

The terms used in the present document should be understood as and have the following meaning:

‘Personal Data’ means any information relating to an identified or identifiable natural person (‘Data Subject’);

‘Data Subject’ means an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; in the present context, all End Users of ALGOREG’s Clients are here specifically Data Subjects;

‘Data Controller’ means the legal person which, alone or jointly with others, determines the purposes and means of the processing of Personal Data; ALGOREG’s Clients are here specifically Data Controllers;

‘Data Processor’ means a person which processes Personal Data on behalf of the Controller; ALGOREG is here specifically the Processor;

In accordance with the national and European regulations in force, in particular the General Data Protection Regulation of 27 April 2016 (hereinafter "GDPR") and in the context of services provided as described hereafter, ALGOREG processes Personal Data on behalf of its clients.

## II. Purpose

The purpose of this Data Privacy Policy is to inform you (being the Data Subject) about the process carried out on your Personal Data (purposes, legal bases, retention periods, recipients, confidentiality and security measures taken by ALGOREG) and the rights you have over your data under the GDPR.

### III. Persons concerned by our processing of Personal Data

ALGOREG collects directly or indirectly, through our clients, some of your Personal Data and processes them on behalf of our clients, to perform the KYC verifications, with a high level of confidentiality and security.

In the case of indirect access to your data, companies who transfer your data to ALGOREG need to inform you in advance if this is legally required.

### IV. Categories of Data Processed

We only process Personal Data that is adequate, relevant and limited to what is strictly necessary for the purposes for which it is processed, in accordance with the principle of Data Minimization.

It should be remembered here that Personal Data is information that allows your identification, direct or indirect.

In the context of the KYC verifications that ALGOREG performs on behalf of its clients, the categories of Personal Data that we process are as follows:

- Identification data (surname, first name, address, telephone number, etc.),
- data of personal characteristics (date and place of birth, nationality, etc.),
- identification and electronic authentication data (e-mail address, IP addresses, phone number, etc.),
- recording of images and sounds and copies of official documents.

### V. Lawfulness and purposes of processing

We process your Personal Data to fulfill specific, explicit and legitimate purposes, on behalf of our clients to whom we provide the service of KYC verification.

Each of our processing of Personal Data is based on the following lawfulness base that our clients need to comply with: compliance with their legal and regulatory obligations, in particular with regard to the fight against money laundering and the financing of terrorism.

The purposes of our processing include, but are not limited to prevention against identity theft, tax fraud, money laundering and terrorist financing.

## VI. Recipients of data and transfer to third parties

Your data is processed by our internal employees specifically authorized to process it and subject to strict confidentiality obligations.

ALGOREG has not identified any transfer of Personal Data outside the European Union carried out in the course of its activities.

## VII. Data Retention Period

Personal Data Retention Period depends on our clients processing purpose.

Thus, our clients define how long Personal Data should be stored and when to delete it.

For example, based on AML-CFT regulations, regulated financial companies are obliged to store the end user Personal Data for five years after the termination of the Client's relationship with the end user or the date of the occasional transaction.

## VIII. Confidentiality and Security of Your Data

ALGOREG undertakes to pay particular attention to the security of your Personal Data.

ALGOREG takes, to do this, the appropriate physical, technical and organizational measures to prevent as far as possible any alteration or loss of data or any unauthorized access to them.

## IX. Your Rights

As a natural person subject to one of our processing of Personal Data, and subject to the limitations provided for by the GDPR, you have certain rights and in particular:

- a **right of access** to your Personal Data (and in particular to obtain a copy of your data);
- a **right to rectification** and/or updating of your incomplete and/or inaccurate Personal Data;
- a **right to request the erasure** of some of your data;
- a **right to limit and object** to one of our processing operations;
- a **right to the portability** of your Personal Data to a third party.

The GDPR also provides for the right **to object to automated individual decision-making, including profiling**. We have not identified within our scope of work such a treatment. All automated treatments performed by ALGOREG are reviewed by specifically trained internal employees.

## X. Exercising your rights

If you wish to assert one of your rights, you can send a complaint by post to ALGOREG SA, at 1, Op de Leemen, L-5846 Fentange, Luxembourg, LUXEMBOURG, or by email to our support team: [legal@alcoreg.com](mailto:legal@alcoreg.com)

In case of any difficulty in connection with the management of your Personal Data, you can lodge a complaint with the CNPD - National Commission for Data Protection (more information on [www.cnpd.public.lu](http://www.cnpd.public.lu)).

## XI. DPO responsibilities

ALGOREG's Data Protection Officer can be contacted via the following e-mail address: [legal@alcoreg.com](mailto:legal@alcoreg.com)

ALGOREG's Data Protection Officer is responsible for:

- Giving guidance and ensuring compliance with this data privacy policy as well as the EU GDPR;
- Ensuring that any Personal Data breaches are resolved, listed and reported appropriately in a timely manner;
- Investigating and responding to complaints regarding data protection, including Data Subject's requests.

## XII. Personal Data Storage

ALGOREG confirms that all the Personal Data processed on behalf of its clients in the context of KYC verification services are stored on servers located inside the European Economic Area.

## XIII. Update of this data privacy policy

We update this Data Privacy Policy regularly and as regulations evolve or as the range of our services is enhanced.