

QUOINE Pte. Ltd.. (the “Company”) establishes the following personal information protection policy (this “Privacy Policy”) to promote the protection of personal information. The terms used in this Privacy Policy are governed by the meanings ascribed under the Terms of Use.

#### Article 1 General Provisions

The Company respects the privacy of everyone who uses its services, and carefully manages users’ personal information.

The Company implements, maintains, and continually improves measures to protect users’ personal information. The Company furthermore complies with laws, regulations, and other standards regarding the protection of personal information.

#### Article 2 Definition of Personal Information

In this Privacy Policy, “personal information” means the personal information defined in Article 2(1) of the Personal Information Protection Act. That is to say, information about a living individual that can be used to identify the specific individual based on the name, date of birth, and other description included in the information (including such information as will allow easy reference to other information and will thereby enable the identification of the specific individual).

#### Article 3 Purpose of Use of Personal Information

The Company uses personal information collected from users for the following purposes:

- (1) To verify the identity of users in the course of creating user accounts;
- (2) To offer services via our platform, such as handling user deposits to user accounts, refunding money to users, and the like;
- (3) To provide answers to, or respond to inquiries or consultations by, users;
- (4) To introduce the services of the Company and subsidiaries and affiliates of the Company to users;
- (5) To conduct analyses for improving the services of the Company and subsidiaries and affiliates of the Company;
- (6) To conduct market research with respect to products or services of the Company and subsidiaries and affiliates of the Company and to research and develop financial products or services by conducting data analysis and sending questionnaire etc.;
- (7) To provide maintenance and support regarding the services of the Company and subsidiaries and affiliates of the Company;
- (8) To notify changes or updates in the terms of use, regulations, guidelines, explanation on risk in

virtual currency trading, policies, notes and other rules (the “Rules”) related to the services of the Company and subsidiaries and affiliates of the Company:

- (9) To prepare backup data;
- (10) To issue a warning or take disciplinary action, etc. against a user who has, or is at risk of having, breached the Rules;
- (11) To conduct internal audits;
- (12) To contact users in the case of an emergency; or
- (13) To perform work incidental to the abovementioned purposes.

#### Article 4 Changing the Purposes of Use

The Company may change the purposes of use of the personal information to the extent deemed sufficiently relevant and reasonable, and the Company will notify or make an announcement to the users when it makes a change.

#### Article 5 Restrictions on Use of Personal Information

Except where permitted by the Personal Information Protection Act and other laws and regulations, the Company will not use personal information outside of the scope required to achieve the purposes of use without obtaining the user’s consent. However, this will not apply in the following cases:

1. When pursuant to a law or regulation;
2. When necessary to protect the life, body, or property of an individual, and it is difficult to obtain the user’s consent;
3. When especially necessary for improving public health or advancing the sound nurturing of children, and it is difficult to obtain the user’s consent; and
4. When necessary to cooperate with the execution of affairs set forth in a law or regulation by a government institution, local government, or an individual or entity retained thereby, and there is a risk that obtaining the user’s consent would hamper the execution of those affairs.

#### Article 6 Proper Acquisition of Personal Information

The Company will properly acquire personal information, and it will not do so through fraudulent or unjust means. Further, please understand that if a user or other data subject, etc. refuses to provide personal information, the Company may refuse to offer its services to that user, etc. or the services offered by the Company may work improperly, etc.

#### Article 7 Secure Management of Personal Information, etc.

The Company will conduct the necessary and appropriate oversight of its employees in order to securely manage personal information to prevent the risk of loss, destruction, falsification, or leakage, etc. If the Company delegates all or part of the handling of personal information, the Company will conduct the necessary and appropriate oversight of the delegatee to ensure the secure management of personal information.

#### Article 8 Provision of Personal Information to Third Parties

Except where permitted by the Personal Information Protection Act and other laws and regulations, the Company will not disclose or provide personal information to third parties without first obtaining the consent of the users. However, the following cases do not fall under a disclosure or provision to a third party as provided above:

1. The Company delegating all or part of the handling of personal information to the extent required to achieve the purposes of use; or
2. The Company provides personal information for under business succession in a merger or other event.

#### Article 9 Delegation of Personal Information Management

The Company may delegate all or part of the handling of personal information to the extent required to achieve the purposes of use. In that case, the Company will select a delegatee that it deems will properly handle the personal information, will appropriately set forth matters in a service agreement regarding security management measures, confidentiality, the terms of sub-delegations, the return of personal information upon the termination of the delegation agreement, and other matters on the handling of personal information, and will conduct the necessary and appropriate oversight of the delegatee.

#### Article 10 Continual Improvement

The Company will review the operational circumstances of handling personal information as necessary and make every effort to make continual improvements. The Company will also amend this Privacy Policy as needed.

#### Article 11 Data Backups

The Company may regularly backup data. This data may in some cases include personal information that was acquired by the Company when a user used the Company's services. The Company may save this information even after a user loses his or her user status. The Company is not, however, obligated to save this information, and does not guarantee that the saved information will be reusable.

#### Article 12 Procedures to Request Disclosure

If a user requests the disclosure of his or her personal information, the Company will make the disclosure to that user without delay after verifying the identity of the user making the request, unless the Company is not obligated to do so pursuant to the Personal Information Protection Act or other laws and regulations (the Company will provide notice if no such personal information exists). Furthermore, users may verify and correct the personal information held by the Company on the user information management page. The Company charges users a separate fee (¥1,000 (not including tax)) for each instance that the Company assists with disclosure request procedures.

#### Article 13 Correction, etc. of Personal Information

If a user requests the company to correct, add, or delete ("Correct, etc.") any of his or her personal information pursuant to the provisions of the Personal Information Protection Act, the Company will verify that the user himself or herself made the request, will conduct the necessary review without delay within the scope required to achieve the purposes of use, will Correct, etc. the details of the personal information based on the results of the review, and notify the user that it has done so (the Company will also notify the user in the case that the company decides that it will not make a Correction, etc.). However, this will not apply if the Company is not obligated to make a Correction, etc. under the Personal Information Protection Act or any other law or regulation.

#### Article 14 Suspension, etc. of Use of Personal Information

If pursuant to the provisions of the Personal Information Protection Act a user requests the Company to suspend the use of or delete ("Suspend Use, etc.") the user's personal information because the personal information is being handled beyond the ambit of the purposes of use that were published in advance or was acquired by fraudulent or illicit means, and the Company finds that there are grounds for the request, the Company will verify that the user himself or herself made the request, will immediately Suspend Use, etc. of the personal information, and will notify the user that it has done so. However, this will not apply if the Company is not obligated to make a Correction, etc. under the

Personal Information Protection Act or any other law or regulation.

#### Article 15 Exemptions

The Company will take stringent measures to protect personal information from outside attacks or threats, but personal information is always at risk from such attacks and threats. The Company does not provide any guarantee regarding the effectiveness of these protective measures or our ability to prevent other parties, acting unlawfully, from gaining access to information. The Company, its officers, employees, delegates, and other related parties bear no liability whatsoever for damage arising due to a leak of personal information despite the implementation of reasonable measures by the Company.

#### Article 16 Inquiries

Please contact the Company using the following information to inquire about disclosure, share an opinion, ask a question, state a complaint, or otherwise ask about how the Company handles personal information.

Email address: [support@quoine.com](mailto:support@quoine.com)

\* In case where a customer needs to contact the Company by phone, please request the telephone number of the Company through the email address above. The Company promptly let the customer know the telephone number upon the customers' request.