

# GROW PRIVACY POLICY AND COOKIES POLICY

## **IMPORTANT NOTICE**

This policy will apply to the personal data you provide to us and the personal data we hold about you. DO NOT provide any personal data to us unless you accept this policy.

## **1 ABOUT THIS POLICY**

- 1.1 This Policy has been adopted by GEN ONE INC. (“**GROW**”).
- 1.2 In this Policy, “we”, “us” or “our” refers to GROW or any of our affiliates, as appropriate.
- 1.3 This Policy governs our collection, processing, use and disclosure of your personal data and our use of cookies and similar technologies when you access or use our websites, applications and services, or when you provide us with your personal data.
- 1.4 Please contact our Data Protection Officer with questions, comments, or concerns regarding our Privacy Policy and Cookies Policy and/or practices, or if you wish to make a complaint to us, at support@grow3.io. When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond.
- 1.5 We reserve the right to amend and modify this Policy at any time without notice to you, in compliance with applicable laws or as we update our data usage and handling processes. The updated Policy will supersede earlier versions and will apply to personal data provided to us previously.

## **2 OVERVIEW**

- 2.1 The purpose of this Policy is to describe:
  - 2.1.1 The personal data we collect and how we may use such data;
  - 2.1.2 How and why we may disclose your personal data to third parties;

- 2.1.3 The transfer of your personal data outside your country of residence;
  - 2.1.4 Your rights concerning your personal data;
  - 2.1.5 The security measures we use to protect and prevent the loss, misuse, or alteration of personal data; and
  - 2.1.6 Our retention of your personal data.
- 2.2 In cases where we require your consent to process your personal data, we will ask for your consent to the collection, use, and disclosure of your personal data as described further below. We may provide additional disclosures or additional information about the data collection, use and sharing practices of specific services. These notices may supplement or clarify GROW's privacy practices or may provide you with additional choices about how GROW processes your personal data.

### **3 COLLECTING PERSONAL DATA**

- 3.1 What is personal data. "Personal data" is data that can be used to identify a natural person and/or a corporate entity. Examples of personal data include name, address, contact details, identification numbers, financial information, transactional information based on your activities on our websites, applications and platforms, telephone numbers, email address, images, and any other information of a personal nature.
- 3.2 Voluntary provision of personal data. Your provision of personal data to us is voluntary, and you are free to choose whether to provide us with the types of personal data requested. You also have the right to withdraw your consent for us to use your personal data at any time by contacting us. However, if you do so, we may not be able to fulfil the purposes for which we require the personal data, including offering you some or all our services which you require from us.
- 3.3 Collecting your personal data. We collect personal data that is relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, such as when:
- 3.3.1 you authorize us to obtain your personal data from a third party;
  - 3.3.2 you visit our websites, download or use our applications;
  - 3.3.3 you use or request information about our services;
  - 3.3.4 you register an account with us through our websites or applications;

- 3.3.5 you subscribe to marketing communications, request support, complete surveys, or communicate with us or request that we contact you through various communication channels (e.g. social media platforms, messenger platforms, face-toface meetings, telephone calls, e-mails, faxes and letters);
  - 3.3.6 you attend one of our events, programs, or participate in our competitions, contests or games;
  - 3.3.7 your images are captured via photographs or videos taken by us or our representatives when you are within our premises or attend events organized by us; 3.3.8 we seek information about you and receive your personal data in connection with your relationship with us (e.g. if you are an investor or shareholder); or
  - 3.3.9 when you submit your personal data to us for any other reason.
- 3.4 Information we collect from other sources. Depending on your relationship with us, we may also collect your personal data from third party sources, for example:
- 3.4.1 our business partners such as third parties providing advertising, marketing and promotional services to us;
  - 3.4.2 your referees, educational institutions or previous employers (if you have applied to us for a job);
  - 3.4.3 your family members or friends who provide your personal data to us on your behalf;
  - 3.4.4 public authorities, public websites, social media, and other sources, which may include information related to your identification, location, reputation, business activities, and other personal details.
- 3.5 Automated data collection technologies. Our websites, applications and services may contain or involve certain technologies (including those described below) that collect data from you.
- 3.5.1 Cookies. Cookies allow your browser or device to be recognized. We may make use of cookies to store and track information such as the number of users, frequency of use, profiles of users and online preferences. Cookies do not capture information that personally identify you, but we may use information collected to analyze the usage of our websites and applications and to improve your user experience. You may disable cookies through your device or plug-in settings. However, this may affect your use of our websites

and applications. Please see Clause 9 below for more information about our cookies, and how to disable cookies.

- 3.5.2 Website log files. We collect data in the form of server log files that tell us generally about the activity of users on our websites and applications, including length of visits, the webpages requested, IP address, cookies, the type of web browser and operating system you are using, click-stream data and so forth. We use this data to analyze overall trends, administer our websites, applications and services, track usage, optimize and improve your user experience, as well as evaluate and improve our websites, applications, and services.
- 3.5.3 Analytical tools. We use analytical tools, which allow us to, among other things, identify potential performance or security issues with our websites, applications, and services, improve their stability and function, understand how you use them, so that we can optimize and improve your user experience, as well as evaluate and improve our websites, applications and services.
- 3.5.4 Third party analytical tools. Our analytical tools include third party tools. We do not control these third parties, their technologies or how they may collect and use information through their tools. The tools that are currently in use include Google Tag Manager (<https://marketingplatform.google.com/about/tag-manager/>), Google Analytics (<https://marketingplatform.google.com/about/analytics/>), and Google Firebase (<https://firebase.google.com/>). More details about these tools, including the privacy policies of their provider can be found on their respective websites. If you have any queries about these technologies and how they collect and use information, please contact the responsible provider directly.
- 3.5.5 Web tracking beacons and tracking links. Web beacons (also known as pixel tags and clean GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our website or our (mobile) applications. In conjunction with cookies, these are primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites, as well as finding out if an e-mail has been received and opened and to see if there has been any response.

Please do not use our websites, applications, and services if you do not wish to have your data collected through such means. Alternatively, you may also disable the operation of these technologies on your devices where it is possible to do so. Our websites, applications and services do not support Do Not Track (“DNT”). However, you may enable or disable DNT, if supported by your web browser, by enabling or disabling this feature in the preferences or settings page of your web browser.

- 3.6 What personal data we collect from you. The personal data we may collect from you depends on the purposes for which we will be using the personal data and what you have chosen to provide. Where appropriate, personal data that we collect may include (but not limited to) the following:
  - 3.6.1 Personal identification information, such as your full name, home address, email address, date of birth, age, nationality, gender, signature, and photographs.
  - 3.6.2 Formal identification information, such as tax identification number, passport number and details, driver’s license details, national identity card details, photograph identification cards, and immigration visa information.
  - 3.6.3 Account information, such as your username, password, account settings and preferences.
  - 3.6.4 Financial information, such as bank account numbers, bank statement, virtual currency wallet addresses, trading data, and tax identification.
  - 3.6.5 Residence verification information, such as utility bill details, bank statements, or similar information.
  - 3.6.6 Device information, such as the hardware, operating system, and browser used by you, and any other information that is automatically collected about your device.
  - 3.6.7 Location information, such as your IP address and/or domain name, any external page that referred you to us, and any other information that is automatically collected via analytics systems providers to determine your location.
  - 3.6.8 Log information, such as device-specific information, location information, system activity, any internal and external information related to the pages on our websites and applications that you visit, and any other that is generated by your use of our websites, applications and services that is automatically collected and stored in our server logs.

- 3.6.9 Account information – Information that is generated by your account activity, such as trading activity, order activity, deposits, withdrawals, and account balances.
- 3.7 Providing personal data belonging to others. In certain circumstances, you may also provide us with personal data of persons other than yourself (such as your family members). If you do so, you are responsible for informing him/her of the specific purposes for which we are collecting his/her personal data and to ensure that he/she has provided valid consent for your provision of his/her personal data to us.
- 3.8 Accuracy and completeness of personal data. You are responsible for ensuring that all personal data that you provide is true, accurate and complete, and to inform us of any changes to your personal data.
- 3.9 Minors. We do not knowingly request to collect personal data from any person under the age of 19. If an individual submitting personal data is suspected of being younger than 19 years of age, we will require the user to close his or her account.

#### **4 WHAT WE DO WITH YOUR PERSONAL DATA**

- 4.1 Purposes. We only collect, use, disclose and process your personal data for purposes connected or relevant to our business, or to manage your relationship with us, including the following:-
  - 4.1.1 Carrying out such transactions or taking steps as may be directed by you. We may collect, use, disclose or process your personal data in order to carry out such transactions or take steps as may be directed by you. If you do not provide such personal data, we (or the relevant third party, as the case may be) may not be able to perform the necessary transactions or steps required to perform the necessary services.
  - 4.1.2 To maintain legal and regulatory compliance. We are required by law to collect, use, or disclose your personal data in connection with certain of our services. For example, we must identify and verify users to comply with anti-money laundering and countering the financing of terrorism laws in various jurisdictions. If you do not provide this personal data, you will not be allowed to use our services.
  - 4.1.3 To ensure network and information security. We process your personal data to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable

security laws and regulations. The threat landscape on the internet is constantly evolving, which makes it more important than ever that we have accurate and up-to-date information about your use of our services. Without processing your personal data, we may not be able to ensure the security of our services.

- 4.1.4 To provide services to you. We collect, use, disclose and process your personal data to provide services to you, including (i) opening an account and to process your transactions; (ii) carrying out a transaction with you or on your behalf; (iii) authenticating, operating, and maintaining your user accounts; and (iv) providing and maintaining our websites, applications and services. We cannot provide you with services without such information.
- 4.1.5 To provide communications. We send administrative or account-related information to you to keep you updated about our services, inform you of relevant security issues or updates, or provide other transaction-related information. Without such communications, you may not be aware of important developments relating to your account that may affect how you can use our services.
- 4.1.6 To provide customer service. We may collect, use, disclose and process your personal data to resolve user questions or disputes, to collect fees, or to troubleshoot problems. Without your personal data, we may not be able to respond to your requests and ensure your uninterrupted use of our services.
- 4.1.7 To ensure improvements and quality control. We may collect, use, disclose and process your personal data to conduct (i) data analytics to enable us to improve our website, applications, and services; and (ii) quality control and staff training (including business research, data, planning and statistical analysis) to make sure we continue to provide you with accurate information and well-functioning services. If we do not collect, use, disclose and process personal data for such purposes, you may experience issues on our services such as inaccurate transaction records or other interruptions.
- 4.1.8 To carry out legitimate business interests (as described in Clause 4.2 below); and
- 4.1.9 other reasonable purposes related to the above.

4.2 Legitimate business interests. Our legitimate business interests include:

- 4.2.1 Managing our business and relationship with you, and providing services to, our users and customers. We may collect, use, disclose and process your personal data for various business needs. For example, we may disclose your personal data to third parties who provide services to us, including our service providers and data processors (providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, marketing, human resources, and professional services) and our consultants and professional advisors (such as accountants, lawyers, auditors). We will not be able to provide our services to you in the absence of your personal data.
- 4.2.2 Protecting our rights and interests and those of our users and customers. Due to the importance of information we handle, such as your identification and financial data, it is very important for us and our customers that we actively monitor, investigate, prevent and mitigate any potentially prohibited or illegal activities or violations of any applicable agreements and/or terms, and enforce our agreements with third parties, and violations of any agreement related to our services. We may collect, use, disclose and process any of your personal data collected on our services for these purposes.
- 4.2.3 For research and development purposes. We may collect, use, disclose and process your personal data to better understand the way you use and interact with the website, applications, and services. In addition, we use such information to customize, measure, and improve the website, applications and services and the content and layout of the website, applications, and services, and to develop new services. Without such processing, we cannot ensure your continued enjoyment of our website, application, and services.
- 4.2.4 To understand and respond to inquiries and feedback. We may collect, use, disclose and process your personal data to understand and respond to inquiries and feedback from you and/or other users.
- 4.2.5 To enhance user experience. We may collect, use, disclose and process your personal data to provide a personalized experience and to implement the preferences you request. Without such processing, we may not be able to ensure your continued enjoyment of part or all our services.



- 4.2.6 To enforce obligations owed to us, or to protect ourselves from legal liability. Given the variety of services that we offer to you, we may collect, use, disclose and process your personal data to enforce obligations owed to us, or to protect ourselves from legal liability.
- 4.2.7 To facilitate corporate acquisitions, mergers, or transactions. We may process any information regarding your account and use of our services as is necessary in the context of corporate acquisitions, mergers, or other corporate transactions. You have the option of closing your account if you do not wish to have your personal data processed for such purposes.
- 4.3 Marketing purposes. If you have provided us with your consent, we may send you marketing communications to inform you about our events or our partner events, to deliver targeted marketing, and to provide you with promotional offers based on your communication preferences. We use information about your usage of our services and your contact information to provide marketing communications. We may also share personal data with third parties to help us with our marketing and promotional projects or sending marketing communications. For example, we may participate in Facebook's Custom Audience and Google's Customer Match programs, in which we may provide certain personal data to Facebook and Google for the purpose of delivering targeted advertisements to other internet users.
- 4.4 Automated decision making. We may make automated decisions on certain matters, such as to fulfill our obligations imposed by law (for example, to verify your identity), to detect fraudulent or prohibited activities, or to determine whether you are eligible for certain of our services. If you disagree with the decision you are entitled to contest this by contacting our Data Protection Officer (please see Clause 1.4 for details).
- 4.5 Purposes permitted under applicable laws. We may also collect, use, disclose and process your personal data for other purposes, without your knowledge or consent, where this is required or permitted by law.
- 4.6 Contacting you. When using your personal data to contact you for the above purposes, we may contact you via e-mail, telephone, or any other means. We will not contact you for marketing purposes unless with your consent, or we are exempted by applicable law from having to obtain consent. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us.

## **5 DISCLOSURE OF PERSONAL DATA**

- 5.1 Disclosure to related parties. We may disclose or share your personal data with our related organizations or business partners in connection with the purposes described in Clause 4.
- 5.2 Other disclosures. We take care to allow your personal data to be accessed only by those who need to perform their tasks and duties, and to share your personal data only with third parties for purposes described in Clause 4, including the following circumstances:
  - 5.2.1 We may share your personal data with third parties in order to provide such third parties' products and/or services as may be requested or directed by you. In such event, you will be deemed to have agreed to such third parties' Privacy Policy when you provide your personal data to us.
  - 5.2.2 We may share your personal data with third party identity verification and transaction monitoring services to assist in the prevention of fraud and other illegal activities and to fulfill our obligations under anti-money laundering and countering the financing of terrorism laws and regulations. This allows us to confirm your identity by comparing the personal data you provide us to public records and other third-party databases and to monitor transactions to fulfil our legal and regulatory obligations to report suspicious activities.
  - 5.2.3 We may share your personal data with service providers under contract who provide professional services (such as legal and accounting advisors) or help with parts of our business operations (such as marketing, payment, and technology services). Our contracts will require these service providers to use your personal data only in connection with the services they perform for us and prohibit them from selling your personal data to anyone else.
  - 5.2.4 We may share your personal data with financial institutions and payment services providers with which we partner to process payments you have authorized.
  - 5.2.5 We may share your personal data with third parties which use our website, applications, and services to provide various services to you.
  - 5.2.6 We may share your personal data with organizations that we plan to merge with or be acquired by.
  - 5.2.7 We may share your information with companies or other entities that purchase GROW's assets pursuant to a court-approved sale under

applicable bankruptcy laws or where we are required to share your information pursuant to applicable insolvency laws.

5.2.8 We may share your information with law enforcement, government officials or regulators, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure, or when we believe in good faith that the disclosure of personal data is necessary to prevent physical harm or financial loss, to comply with applicable laws and regulations, to report suspected illegal activity, or to investigate violations of any applicable terms and/or policies.

5.2.9 In addition, from time to time we may request your consent to share your information with third parties in certain other circumstances. Such requests may be presented to you in our terms and/or agreements with you, an email from us to you, or otherwise through the website, applications, and services.

## **6 CROSS-JURISDICTIONAL TRANSFERS**

6.1 We may store, process, and transfer your personal data in connection with the purposes described in Clause 4:

6.1.1 from the jurisdiction where it is collected (or where you are located) to any other jurisdiction that we operate in; and

6.1.2 to third parties in other jurisdictions.

Where we transfer your personal data across jurisdictions, we will ensure that your personal data is treated securely in accordance with this Policy and applicable laws regardless of the jurisdictions that they are transferred to. For example, we may enter into contracts with recipients to protect your personal data. You may obtain details of these safeguards by contacting us.

## **7 YOUR RIGHTS**

7.1 You have certain rights at law in relation to our collection, use, disclosure, and processing of your personal data. These rights include:

7.1.1 **Access.** You may request that we provide you a copy of your personal data held by us. In accordance with applicable laws, we may request that you specify the information or processing activities to which your request relates before we provide you with a copy of your personal data.

- 7.1.2 Correction. You may request that any incomplete or inaccurate personal data we hold about you is corrected.
- 7.1.3 Withdrawal of consent. you may withdraw consent for our use of your personal data.
- 7.2 Other rights. Depending on the laws applicable to you, you may also enjoy additional rights. For example, if you are resident in the European Union, you may also enjoy certain additional rights, including:
  - 7.2.1 Erasure. You may ask us to delete or remove personal data that we hold about you in certain circumstances.
  - 7.2.2 Restriction. You may withdraw consent for our use of your personal data, or ask us to suspend the processing of certain of your personal data about you, for example, if you want us to establish its accuracy.
  - 7.2.3 Data portability. You may obtain or request the transfer of certain of your personal data to another party under certain conditions.
  - 7.2.4 Objection. If we are processing your personal data based on our legitimate interests (or those of a third party), you may object to processing on this ground.
  - 7.2.5 Automated decisions. You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.
- 7.3 Limitations. We may be permitted under applicable laws to refuse a request, for example, we may refuse (a) a request for erasure where the personal data is required in connection with claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.
- 7.4 Complaint. If you believe that we have infringed your rights, we encourage you to contact us our Data Protection Officer (see Clause 1.4 above for details) so that we can try to resolve the issue or dispute informally.

## **8 PROTECTION OF PERSONAL DATA**

- 8.1 Security arrangements. We use a variety of security measures to ensure the confidentiality of your personal data and to protect your personal data from loss, theft, unauthorized access, misuse, alteration, or destruction. For example, we use

computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorize access to personal data only for those employees who require it to fulfill their job responsibilities.

- 8.2 Unauthorized access. While we take reasonable precautions to safeguard your personal data in our possession or under our control, we cannot guarantee that loss, theft, unauthorized access, misuse, alteration, or destruction of your personal data will not occur. Achieving complete security (whether in transmission or storage of data) is impossible and/or impractical. We cannot be held responsible for unauthorized or unintended access that is beyond our control, such as hacking or cybercrimes. Please take adequate measures to protect your personal data. When registering to use our services, it is important to choose a password of sufficient length and complexity and to keep this password a secret. Please notify us immediately if you become aware of any unauthorized access to or use of your account.
- 8.3 Disclaimer. We cannot provide any guarantee regarding the security or confidentiality of personal data that you transmit to us or receive from us via the internet or wireless connection, including email, phone, or SMS. We do not make any warranty, guarantee, or representation that your use of our websites and applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities.
- 8.4 Retention of personal data. We retain personal data for as long as necessary to fulfill the purposes described in this Policy, and to satisfy our own legal, regulatory, and business purposes, including data analytics, audit, accounting or reporting purposes. The criteria we may use to determine the retention period for certain categories of data includes:
  - 8.4.1 how long you have had an account with us;
  - 8.4.2 whether there are contractual or legal obligations that require us to retain the data for a certain period of time;
  - 8.4.3 whether there is any ongoing legal or financial claim that relates to your relationship with us; and
  - 8.4.4 whether any applicable law, statute, or regulation allows for a specific retention period.
- 8.5 Period of retention. How long we keep your personal data depends on the nature of the data. Some information may also be retained for longer, e.g. where we are required to do so by law.

8.6 Anonymized data. When personal data is no longer needed, we have procedures either to destroy, delete, erase, or convert it to an anonymous form. When we anonymize your personal data such that it can no longer be associated with you, we shall be entitled to retain and use such data without restrictions.

## **9 COOKIES POLICY**

9.1 Description of cookies. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to allow websites to work properly or more efficiently, as well as to provide information to the owners of the website.

9.2 There are two general categories of cookies. “First-party cookies” cookies are set directly by us. “Third-party cookies” are set by a third party, and that third party can recognize your computer both when it visits our websites and applications, and when it visits certain other websites and/or mobile apps.

9.3 Cookies can remain on your computer or mobile device for different periods of time. Some cookies are “session cookies”, which exist only while your browser is open and expire once you close your browser. Other cookies are “persistent cookies”, which survive after your browser is closed. They can be used by websites to recognize your computer when you open your browser and browse the internet again.

9.4 More information on cookies and their use can be found at <https://www.aboutcookies.org/> or <https://allaboutcookies.org/>.

9.5 Why we use cookies. When you access our websites, application and/or services, we or companies we work with may place cookies on your computer or other device. These technologies help us better understand user behavior and inform us about which parts of the websites, applications and/or services people have visited.

9.6 We use cookies for the purposes described in Clause 4 above.

9.7 Categories of cookies we use. We may use the following categories of cookies:

9.7.1 Strictly necessary cookies. These cookies are necessary because they enable you to move around our websites and applications, and use certain features of our services. For example, strictly necessary cookies allow you to access secure areas. Without these cookies, some services cannot be provided.

9.7.2 Functionality cookies. These cookies allow us to remember the choices you make and to tailor our services so we can provide relevant content to you. For

example, a functionality cookie can remember your preferences (e.g. country or language selection), or your username.

9.7.3 Performance/analytics cookies. These cookies collect information about how you use a website. For example, a performance/analytics cookie will collect information about which pages you go to most often, how much time you spend on that page, or if you get error messages from certain pages. These cookies do not gather information that identifies you. The information these cookies collect is anonymous and is only used to improve how our services work.

9.7.4 Advertising and tracking cookies. Our websites and applications may feature advertising. We may allow third party companies, including advertising companies, to place cookies on our websites and applications. These cookies enable such companies to track your activity across various sites where they display ads and record your activities so they can show ads that they consider relevant to you as you browse the Internet. These cookies also allow us and third parties to know whether you have seen an ad or a type of ad, and how long it has been since you last saw it. This information may be used for frequency capping purposes, to help tailor the ads you see, and to measure the effectiveness of ads. These cookies are anonymous – they store information about the content you are browsing, but not about who you are.

9.8 Avoiding and disabling cookies. You have the right to choose whether or not to accept cookies, and instructions for exercising this right are given below. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of our websites and applications.

9.8.1 Our Cookies. Most browsers allow you to change your cookie settings. These settings will typically be found in the “options” or “preferences” menu of your browser.

9.8.2 Do Not Track. Some Internet browsers – like Chrome, Internet Explorer, Firefox, and Safari – include the ability to transmit DNT signals. Since uniform standards for DNT signals have not been adopted, our websites and applications may not be able to process or respond to DNT signals.

9.8.3 Advertising Cookies. To opt-out of third-party advertising networks and similar entities that use targeting/advertising cookies, go to <https://optout.aboutads.info/>. Once you click the link, you may choose to opt-out of such advertising from all participating advertising companies or

only advertising provided by specific advertising entities. For more information about third-party advertising networks and similar entities that use these technologies, please see <https://youradchoices.com/control/>.

**UPDATED ON OCTOBER 1, 2024**