

Radix DLT Limited Privacy Notice

1. INTRODUCTION

This Privacy Notice describes what information we collect about you, why we collect that information, how we may use that information, and the steps we take to ensure that it is kept secure. This notice may be amended from time to time and new versions will be published on our website which can be found at <https://www.radixdlt.com/dlt-privacy-notice/>.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

2. RADIX

This Notice is issued by Radix DLT Limited (“Radix”) and applies to Radix DLT Limited.

Radix is registered under the Data Protection Act 2018 and the UK General Data Protection Regulations (the “Law”) and will process personal data in accordance with the provisions of the Law.

3. WHAT PERSONAL DATA DO WE COLLECT?

1. We collect the following types of personal data:
 - a. Identity Data such as your name, date of birth, gender identity, nationality;
 - b. Contact Data such as your personal email address, and mailing address;
 - c. Demographic information such as age, date of birth, nationality, marital status, next of kin;
 - d. Technical Data including online identifiers such as Internet Protocol (IP) address, type of device you use, mobile network information, browser information, operating system, server logs, language; and
 - e. Details of services provided, token or assets received and exchanged.

The above list is not exhaustive, and Radix may also collect and process other data to the extent that this is considered necessary for our compliance with legislative requirements.

4. SPECIAL CATEGORIES OF PERSONAL DATA

Radix does not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

5. HOW DOES RADIX COLLECT DATA?

1. **Information you give us.** This is information (including Identity, Contact and Marketing and Communications Data) you consent to giving us about you by filling in forms on the Radix website, or by corresponding with us (for example, by email or submitting job applications).

This includes information you provide when you access the Radix website, share data via the Radix's social media functions, when you report a problem with the Radix website or when you sign up to Radix mailing lists.

2. **Information collected through your communications.** We collect the content of all communications between yourself and us, this may include the recording of any calls, email conversations or other communications.
3. **Information we collect about you and your device.** Each time you visit the Radix website, we will automatically collect technical data and usage data. We collect this data using cookies and other similar technologies.
4. **Information we receive from other sources including third parties and publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - a. Third party partners of Radix; and
 - b. Publicly accessible sources such as international sanctions list, electoral registers, company registers, on-line directories, social networks, internet searches etc.

We also work with third parties (including, for example business partners, sub-contractors in services, search information providers or email marketing providers) and we may receive certain information about you from them.

6. DOES OUR WEBSITE USE COOKIES?

We use cookies to distinguish you from other users of the Radix website and to remember your preferences. Cookies helps us to provide you with the best possible experience and allow us to improve the Radix website. Most browsers are initially set to accept cookies, but you can set your browser to refuse them if you want to.

7. HOW DOES RADIX USE PERSONAL DATA?

1. Our use of your personal data will always have a lawful basis. We use and collect personal data on the basis of:
 - a. **Consent:** we will obtain your consent to use your personal data wherever necessary;
 - b. **Contractual necessity:** to enter or perform a contract with you or any contracting entity;
 - c. **Legitimate Interest:** we will use your personal data where we have a legitimate interest, this is where we use your personal data in a way that you would reasonably expect; or
 - d. **Obligation:** where we need to use your personal data to comply with our legal obligations.

2. CONTRACTUAL NECESSITY

- a. We may process your information during the provision of services or communications with you, this may include:
 - i. your use of the Radix website;

- ii. maintain and manage our relationships with you and for ongoing customer service;
- iii. job applications sent to Radix;
- iv. communications with you regarding Radix, through any forum, including through Radix social media accounts; and
- v. delivery of marketing and promotional offers and notification of partner events.

3. LEGAL OBLIGATIONS

- a. Radix will process personal data to comply with legal and regulatory obligations.
- b. Radix will process personal data to comply and enforce agreements with third parties.

4. LEGITIMATE INTERESTS OF RADIX

- a. Radix will process your personal data where it is necessary for us:
 - i. to manage our risks and determine what services we can offer and the terms of those services;
 - ii. to carry out financial risk assessments and for risk reporting and risk management;
 - iii. to protect our business by preventing financial crime or from being used to facilitate financial crime;
 - iv. to develop, test, monitor and review the performance of services, internal systems and security arrangements offered by Radix;
 - v. to provide staff training;
 - vi. to analyse your use of our site and gathering feedback to enable improvement of our site and your experience including development of user experience;
 - vii. to provide you with access to our corporate literature and information about our services;
 - viii. to prevent and detect fraud and abuse; and
 - ix. to enable third parties to carry out technical, logistical and other functions on our behalf.

8. WHO DOES RADIX PROVIDE INFORMATION TO?

- 1. To provide services to you, Radix may be required to share personal data with third parties.
- 2. Radix may disclose or transfer personal data collected by Radix insofar as reasonably necessary for the purposes of providing services or for compliance purposes as well as on the legal basis set out in this Notice.
- 3. Except as described below, Radix will not disclose, transfer, or sell your personal data to any third party without your consent.
- 4. The following are potential recipients of data:
 - a. Radix and associated companies, (including holding and subsidiary companies);

- b. service providers such as lawyers, accountants, banks, investment managers security consultants, on-chain investigation service providers sales agents, and exchanges, etc, who provide services to Radix, where disclosure is necessary to provide those services;
- c. sub-contractors, agents or service providers to Radix and its subsidiaries;
- d. courts or tribunals;
- e. regulators, registrars or other governmental or supervisory bodies with a legal right to the data or where necessary to fulfil Radix's legal and/or regulatory obligations;
- f. law enforcement agencies where disclosure is necessary for Radix or its subsidiaries to fulfil their legal and/or regulatory obligations; and
- g. intermediaries, including fiduciary agents, escrow agents, custody providers.

9. THIRD PARTY PROVIDERS WHO USE THE DATA

1. Where Radix employs another company or individual to perform any function on its behalf, that third party will have access to personal data needed to perform their function, but they may not use it for other purposes.
2. Such functions include, administrative, computer, data processing, screening, marketing services, crypto key authentication and compliance services. Such third parties must process the personal data in accordance with this Privacy Notice and applicable laws.
3. Radix will seek to enter into an agreement with each third party setting out the respective obligations of each party, to ensure they process personal data with the same level of security and confidentiality as Radix and to be reasonably satisfied that the third party has measures in place to protect data against unauthorised or accidental use, access, disclosure, damage loss or destruction.
4. If authorised by you, Radix will disclose your data to any third party that you request. Radix is not responsible for any such third party's use of your data, which will be governed by their agreement with you.
5. The personal data that Radix holds will be used and stored principally in the United Kingdom. When Radix discloses data to third parties to satisfy the purposes outlined above, the third parties are generally located within the European Economic Area (EEA).
6. However, Radix may disclose or transfer personal data to third parties located outside the EEA; if such third parties are located in countries that do not ensure an equivalent level of protection for your personal data, Radix will use best endeavours to ensure that the third party will protect the personal data to an equivalent standard as is in force in the United Kingdom.

10. RETENTION OF PERSONAL DATA

Radix will process and store your personal data for as long as it is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

Radix will endeavour to delete any personal data where it is not necessary for it to be held. Radix will continue to store your personal data as long as necessary to fulfil legal (e.g., anti-money laundering, proceeds of crime and countering the financing of terrorism legislation), regulatory, contractual or statutory obligations, for the establishment, exercise or defence of legal claims and in general where Radix has a legitimate interest for doing so.

11. PROTECTION OF YOUR PERSONAL DATA

1. Radix regards the lawful and appropriate treatment of your personal data as fundamental to our successful operation and to maintaining confidence and trust between Radix and the community. In fulfilling this objective, Radix will:
 - a. ensure that your personal data is not used for any purposes that is incompatible with this Privacy Notice;
 - b. ensure that any processing of your personal data is fair and transparent and sufficient for the uses set out above;
 - c. endeavour to keep your personal data up to date;
 - d. retain your personal data no longer than necessary;
 - e. ensure that our staff are trained to handle personal data appropriately and securely; and
 - f. implement appropriate technical and organisational measures to:
 - i. enable inaccuracies to be corrected and minimise the risk of errors;
 - ii. secure personal data appropriately; and
 - iii. protect your personal data against unauthorised or unlawful access or processing and against accidental loss or destruction.

12. YOUR RIGHTS

1. You have the following rights:
 - a. **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
 - b. **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
 - c. **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - d. **Object to processing of your personal data where we are relying on a legitimate interest** (or those of a third party) and there is something about your particular situation which

makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- e. **Right to data portability** – you have the right to request that a copy of the personal data that Radix holds about you is sent to another entity, or to yourself.
 - f. **Right to object to direct marketing** – you have the right to object at any time to the processing of your personal data for direct marketing purposes by Radix. We will get your express opt-in consent before we share your personal data with any third party for marketing purpose.
2. Rights relating to the use of automated decision making and profiling systems based on personal data:
- a. Radix does not currently make decisions by purely automated means, but should we do so, you have the right to object.

13. REMOVAL OF CONSENT TO PROCESS PERSONAL DATA

1. You have the right to ask Radix to restrict processing of your personal data where:
- a. you contest the accuracy of the personal data held by Radix;
 - b. the processing is unlawful, but you objected to the deletion of the personal data and requested that the use be restricted instead;
 - c. Radix no longer needs the personal data for the processing purpose, but you require them for legal reasons; or
 - d. you objected to processing and Radix is investigating whether there are legitimate grounds to override your objection.

14. CONTACTING US

If you do not wish to receive email or other mail from Radix or for Radix to use personal data that we gather, please contact hello@radixdlt.com in the first instance. If you contact us in relation to your rights, we will do our best to accommodate your request or objection.

You can help us maintain the accuracy of your information by notifying us of any change at hello@radixdlt.com (or via your usual contact). If you have any questions, concerns or complaints with respect to this Privacy Notice, the way Radix is handling your data or have any other queries or concerns, please contact our Data Protection Officer directly at Alex@wigandpen.co or in writing at Radix DLT LIMITED PO Box RADIX DLT, Argyll House, 29-31 Euston Road, London, England, NW1 2SD.

You can register a complaint about our handling of your personal data with the ICO, who are the supervisory authority for UK GDPR, at: www.ico.org.uk/concerns.