

# Ceffu Privacy Notice

Last updated: September, 2024

Ceffu Custody FZE, a free zone establishment, registered within the Dubai World Trade Center (registration number 3247) with registered offices at Office 229 - Level 2, The Offices 1 - One Central, Dubai World Trade Centre, Dubai, United Arab Emirates (“Ceffu”, “we” or “us”) is committed to protecting the privacy of our customers, and we take our data protection responsibilities with the utmost seriousness.

We provide Institutional Virtual Asset Infrastructure to our Business Customers to enable their end-users to access digital asset custody services (“Services”). This Privacy Notice describes the Personal Data that we collect, use, and share about you when you explore, sign up or access Ceffu websites and applications, how it is used, when and how it is shared, the rights and choices that you have, and how you can contact us about our privacy practices. This Privacy Notice also outlines your data subject rights, including the right that you have to object to certain uses of your Personal Data.

This Privacy Notice applies to all Personal Data processing activities carried out by us, across our platform websites and departments. We are a platform that provides Institutional Digital Asset Infrastructure Custody Services, and in order to provide our Services to our Business Customers, we collect and process personal data. Business Customers are entities which directly and indirectly directs its users to Ceffu in connection with its business and activities. End Customers are those customers that are leveraging services directly from Ceffu.

Ceffu is responsible for the processing of your Personal Data as it decides why and how it is processed and thereby acting as the Data Controller for Personal Data collected and processed in connection with the provision of Ceffu's Services.

Ceffu is regulated by the Dubai Virtual Assets Regulatory Authority (“VARA”) to carry out Virtual Asset Custody services in the Emirate of Dubai, including its free zones, but excluding the Dubai International Financial Center.

To the extent that you are not a relevant stakeholder, customer or user of our Services, but are using our website, this Privacy Notice also applies to you together with our Cookie Notice.

This Notice should therefore be read together with our Cookie Notice, which provides further details on our use of cookies on the website. Our Cookie Notice can be accessed [here](#).

## 1. What Personal Data does Ceffu collect and process?

Personal Data means any information that relates to an identified or identifiable individual, and can include information that you provide to us and that we collect about you, such as when you engage with our websites (e.g. device information, IP address).

### Personal Data You Provide to Us

When we refer to “Personal Data you provide to us”, this means any information that you provide to us about yourself. This information is either required by law (e.g., to verify your identity and comply with “Know Your Business” obligations), necessary to provide the requested Services (e.g., you will need to provide your contact details in order to open your account), or is relevant for certain specified purposes, described in greater detail below.

Failure in providing the data required implies that Ceffu will not be able to offer you our Services.

### Personal Data collected automatically from you:

In some cases we may collect personal data automatically from you, to the extent permitted under the applicable law, we may collect certain types of personal data automatically, for example whenever you interact with us or use the Services, when we process your usage data of the platform and when we review your browsing information. This information helps us address customer support issues, improve the performance of our sites and Services, maintain and or improve your user experience, and protect your account from fraud by detecting unauthorized access.

<b>What Personal Data does Ceffu Collect and Process?</b>		
<b>What personal data does Ceffu collect and process?</b>	<b>Why does Ceffu process my personal data?</b>	<b>Legal Basis for our use of Personal Data</b>
Personal Data related to company Directors, UBOs and Authorised persons, including: - Email - Corporate address - First Name - Last Name - Job Title/Role - Signature	Managing our contractual relationship with you, to create and maintain your account. This includes when we use your Personal Data to take and handle orders and process payments.	<b>Performance of a contract</b> when we provide you with products or services or communicate with you about them. This includes when we use your Personal Data to take and handle orders, and process payments. The consequences of not processing your Personal Data for such purposes is the inability to open an account with us or the termination of your account where one is already open.

<p>Personal data related to company Directors, UBOs and Authorised persons, including:</p> <ul style="list-style-type: none"> <li>-Background checks-Biometric Data such as images used to authenticate the identity of an individual),</li> <li>- Browsing related information (e.g., Device ID, IP address), contact information (e.g., email, phone number), employment information (e.g., company name, your role), governmental identifiers data (e.g., ID Card Details), other personal data (age, nationality)</li> </ul>	<p>Personal data provided by you during Know-Your-Business activity to comply with applicable Anti-Money Laundering rules and regulations in jurisdictions where Ceffu is being used by institutional clients.</p>	
<ul style="list-style-type: none"> <li>- Email Corporate address</li> <li>- First Name</li> <li>- Last Name</li> </ul>	<p>To communicate with you on services and transaction related matters. We use your Personal Data to communicate with you in relation to our services on administrative or account related information. We will communicate with you to keep you updated about our Services, for example, to inform you of relevant security issues, 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</p>	<p><b>Performance of a contract</b> when we provide you with products or services, or communicate with you about them. This includes when we use your Personal Data to take and handle orders, and process payments.</p>

	<p>use our Services. You may not opt-out of receiving critical service communications, such as emails or mobile notifications sent for legal, compliance or security purposes.</p>	
<ul style="list-style-type: none"> <li>- Email Corporate address</li> <li>- First Name</li> <li>- Last Name</li> <li>- Region</li> <li>- The Internet protocol (IP) address used to connect your computer to the Internet (“IP address”)</li> <li>- Device ID</li> </ul>	<p>To provide customer support services. We process your personal data when you contact us in order to provide support with respect to questions, disputes, complaints, troubleshoot problems, etc. Without processing this Personal Data for this purpose, we can’t respond to your requests.</p>	<p><b>Performance of a contract.</b> Processing is necessary for the performance of a contract to which you are a party.</p>
<ul style="list-style-type: none"> <li>- IP address</li> <li>- Login, e-mail corporate address, password and location of your device or computer</li> <li>- Ceffu metrics (e.g., the occurrences of technical errors, your interactions with service features and content, and your settings preferences)</li> <li>- Version and time zone settings</li> </ul>	<ul style="list-style-type: none"> <li>- To maintain the safety, security and integrity of our platform. We process your Personal Data in order to enhance security, monitor and verify identity or service access, combat malware or security risks and to comply with applicable security laws and regulations. We process your Personal Data to verify accounts and related activity, find and address violations of our Terms and Conditions, investigate suspicious activity, detect, present and combat unlawful behavior, detect fraud and maintain the integrity of our Services. Without processing your Personal Data, we may not be able to ensure the security of our Services. We use your Personal Data to provide functionality, analyze performance, fix errors, and improve the usability and effectiveness of Ceffu Services</li> </ul>	<p><b>Performance of a contract.</b> Processing is necessary for the performance of a contract of which you are a party.</p>

<ul style="list-style-type: none"> <li>- IP address</li> <li>- Login, e-mail corporate address, password and location of your device or computer</li> <li>- Ceffu metrics (e.g., the occurrences of technical errors, your interactions with service features and content, and your settings preferences)</li> <li>- Version and time zone settings</li> </ul>	<p>-To promote safety, security, and integrity of our Services. Fraud prevention and detection and credit risks. We process your Personal Data to prevent and detect, prevent and mitigate fraud and abuse of our Services and in order to protect you against account compromise or funds loss and in order to ensure the security of our users, our Services and others. We may also use scoring methods to assess and manage credit risks.</p>	<p><b>Our Legitimate Interests.</b> Processing is necessary for the purpose of the legitimate interests pursued by us and the interests of our users when, for example, we detect and prevent fraud and abuse in order to protect the security of our users, ourselves, or others.</p>
<ul style="list-style-type: none"> <li>- IP address</li> <li>- Login, e-mail corporate address, password and location of your device or computer</li> <li>- Ceffu metrics (e.g., the occurrences of technical errors, your interactions with service features and content, and your settings preferences)</li> <li>- Version and time zone settings</li> </ul>	<p>To provide you with our Services. We process your Personal Data to provide the Services to you and process your orders.</p>	<p><b>Performance of a Contract.</b> Processing is necessary for the performance of a contract to which you are a party.</p>

<ul style="list-style-type: none"> <li>- Email Corporate address</li> <li>- First Name</li> <li>- Last Name</li> <li>-Region</li> <li>- Nationality</li> <li>- The Internet protocol (IP) address used to connect your computer to the Internet (“IP address”)</li> <li>- Version and time zone.</li> <li>- Transaction history</li> </ul>	<p>To improve our Services. We process your Personal Data to improve our services, for example, when we want to enhance your experience when navigating our site.</p>	<p><b>Our Legitimate Interests.</b> Processing is necessary for the purpose of the legitimate interest pursued by us to improve our Services and enhance our user experience.</p>
<ul style="list-style-type: none"> <li>- E-mail corporate address.</li> <li>- The Internet protocol (IP) address used to connect your computer to the Internet (“IP address”)</li> <li>- Device ID</li> <li>- Any information requested at the point of the survey/ action.</li> <li>- Name</li> </ul>	<p>To do research and innovate. We carry out surveys to learn more about your experience using our Services. In that way we can support research and drive innovations of our Services and products.</p>	<p><b>Consent</b> We will reach out to you only if you will provide your consent for this activity.</p>
<ul style="list-style-type: none"> <li>- Email</li> <li>- Name</li> </ul>	<p>Providing Ceffu product’s marketing content through emails to customers.</p>	<p><b>Consent</b> We will reach out to you only if you will provide your consent for this activity.</p>

Ceffu does not allow anyone under the age of 21 to use our Services and does not knowingly collect personal data from children under 21.

**2. What About Cookies and Other Identifiers?**

We use cookies and similar tools to enhance your user experience, provide our Services, and enhance our efforts and understand how customers use our Services so we can make

improvements. Depending on applicable laws in the region you are located in, the cookie banner on your browser will tell you how to accept or refuse cookies. A copy of our cookie policy is available [here](#).

### **3. How and Why does Ceffu share your Personal Data**

We may share your Personal Data with third parties (including other Ceffu entities) if we believe that sharing your Personal Data is in accordance with, or required by, any contractual relationship with you or us, applicable law, regulation or legal process. When sharing your Personal Data with other Ceffu entities, we will use our best endeavors to ensure that such entities are either subject to this Privacy Notice, or follow practices at least as protective as those described in this Privacy Notice.

We may also share personal data with the following persons or in the following circumstances:

- **Affiliates**  
Personal Data that we process and collect may be transferred between companies, Services, and employees affiliates with us as a normal part of conducting business and offering our Services to you.
- **Third party service providers**  
We employ other companies and individuals to perform functions on our behalf. Examples include analysing data, providing marketing assistance, processing payments, transmitting content, and assessing and managing credit risk. These third-party service providers only have access to personal data needed to perform their functions, but may not use it for other purposes. Further, they must process the personal data in accordance with our contractual agreements and only as permitted by applicable data protection laws.
- **Legal Authorities**  
We may be required by law or by Court to disclose certain information about you or any engagement we may have with you to relevant regulatory, law enforcement and/or other competent authorities. We will disclose information about you to legal authorities to the extent we are obliged to do so according to the law. We may also need to share your information in order to enforce or apply our legal rights or to prevent fraud.
- **Business transfers**  
As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, user information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the user consents otherwise). Also, in the unlikely event that Ceffu or substantially all of its assets are acquired by a third party, user information will be one of the transferred assets.
- **Protection of Ceffu and others**  
We release accounts and other personal data when we believe release is appropriate to comply with the law or with our regulatory obligations; enforce or apply our Terms of Use and other agreements; or protect the rights, property or safety of Ceffu, our users or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

### **4. International transfers of Personal Information**

To facilitate our global operations, Ceffu may transfer your Personal Data outside of Dubai and the United Arab Emirates to countries where an adequate level of protection is afforded and approved by the UAE Data Office or to countries which may not offer the same level of protection of Personal Data.

We may transfer your Personal Data to Ceffu Affiliates, third-party partners, and service providers based throughout the world. These parties are contractually obliged to protect the confidentiality and security of your Personal Data, in compliance with the applicable data protection law.

Ceffu also puts in place suitable technical, organizational and contractual safeguards (including UAE Standard Contractual Clauses), to ensure that such transfer is carried out in compliance with applicable data protection rules and requirements.

## **5. How secure is My Information?**

We design our systems with your security and privacy in mind. We have appropriate security measures in place to prevent your information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We work to protect the security of your personal data during transmission and while stored by using encryption protocols and softwares. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your personal data. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

Our security procedures mean that we may ask you to verify your identity to protect you against unauthorised access to your account. We recommend using a unique password for your Ceffu account that is not utilized for other online accounts and to sign off when you finish using a shared computer.

## **6. What About Advertising?**

In order for us to provide you with the best user experience, we may share your Personal Data with our marketing partners for the purposes of targeting, modeling, and/or analytics as well as marketing and advertising. You have a right to object at any time to processing of your personal data for direct marketing purposes (see Section 7 “What Rights Do I Have”? below).

## **7. What Rights Do I Have?**

Subject to applicable law, as outlined below, you have a number of rights in relation to your privacy and the protection of your personal data. You have the right to request access to, correct, and delete your personal data, and to ask for data portability. You may also object to our processing of your personal data or ask that we restrict the processing of your personal data in certain instances. In addition, when you consent to our processing of your personal information for a specified purpose, you may withdraw your consent at any time. If you want to exercise any of your rights please contact at [DPO\\_Dubai@ceffu.com](mailto:DPO_Dubai@ceffu.com). These rights may be limited in some situations - for example, where we can demonstrate we have a legal requirement to process your personal information.



- **Right to access:** you have the right to obtain confirmation that your Personal Data are processed and to obtain a copy of it as well as certain information related to its processing;
- **Right to rectify:** you can request the rectification of your Personal Data which are inaccurate, and also add to it. You can also change your Personal Data in your account at any time.
- **Right to delete:** you can, in some cases, have your Personal Data deleted;
- **Right to object:** you can object, for reasons relating to your particular situation, to the processing of your Personal Data. For instance, you have the right to object where we rely on legitimate interest or where we process your data for direct marketing purposes;
- **Right to restrict processing:** You have the right, in certain cases, to temporarily restrict the processing of your Personal Data by us, provided there are valid grounds for doing so. We may continue to process your personal data if it is necessary for the defense of legal claims, or for any other exceptions permitted by applicable law;
- **Right to portability:** in some cases, you can ask to receive your personal data which you have provided to us in a structured, commonly used and machine-readable format, or, when this is possible, that we communicate your Personal Data on your behalf directly to another data controller;
- **Right to withdraw your consent:** for processing requiring your consent, you have the right to withdraw your consent at any time. Exercising this right does not affect the lawfulness of the processing based on the consent given before the withdrawal of the latter;
- **Right to lodge a complaint with the relevant data protection authority:** We hope that we can satisfy any queries you may have about the way in which we process your personal data. However, if you have unresolved concerns, you also have the right to complain to the data protection authority in the location in which you live, work or believe a data protection breach has occurred.

If you have any questions or objections as to how we collect and process your personal data, please contact [DPO\\_Dubai@ceffu.com](mailto:DPO_Dubai@ceffu.com).

## 8. How Long is My Personal Data Kept?

We keep your Personal Data to enable your continued use of the Services, for as long as it is required in order to fulfill the relevant purposes described in this Privacy Notice, and as may be required by law such as for tax and accounting purposes, compliance with Anti-Money Laundering laws, or as otherwise communicated to you. Additionally, identity information and special categories of Personal Data may be retained for 10 years to comply with VARA's and other UAE regulators' record keeping requirements, as well as UAE Anti-Money Laundering laws.

## 9. Contact Information

Our data protection officer can be contacted at [DPO\\_Dubai@ceffu.com](mailto:DPO_Dubai@ceffu.com), and will work to address any questions or issues that you have with respect to the collection and processing of your Personal Data.

## **10. Notices and Revisions**

If you have any concerns about privacy at Ceffu, please contact us, and we will try to resolve them. You also have the right to contact your local Data Protection Authority.

Our business changes regularly, and our Privacy Notice may change also. You should check our websites frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account.