

Privacy Policy

1. Introduction

This Privacy Policy applies to BiyaPay's processing activities regarding the personal data of its customers, potential customers, and website visitors.

Your privacy is of the utmost importance to us. Our policy is to protect the confidentiality of information and respect individual privacy.

Please refer to the following text for information on how we manage personal data and your rights regarding the processing of personal data.

2. Definition

The following terms are defined as follows:

2.1 "AML" stands for Anti Money Laundering.

2.2 "Assets" means any digital representation of value that can be transferred and traded through the BiyaPay service, except for non-fungible tokens.

2.3 "BiyaPay", "I", and "we" refer to BIYA GLOBAL LIMITED and its subsidiaries.

2.4 "Personal information" refers to any information related to an identified or identifiable natural person, including name, ID number, location data, network identifier, or one or more specific factors related to the physical, economic, cultural, or social identity of the natural person.

3. Your data controller

Our products and services are provided through local operating entities belonging to BIYA GLOBAL LIMITED.

You are signing a contract with BIYA GLOBAL LIMITED in accordance with our Terms of Service. The company you sign with is your data controller and is responsible for collecting, using, disclosing, retaining, and protecting your personal data in accordance with our global privacy standards, this Privacy Policy, and any applicable national laws.

4. We may collect information about you

We obtain information about you in various ways through your use of our products and services, including through any of our websites, registration processes, user

surveys, event subscriptions, news and update subscriptions, and information provided during ongoing support service communications.

In order to open an account with us, you must first fill out and submit a registration form with the required information. By filling out this form, you need to disclose personal data so that BiyaPay can evaluate your application and comply with relevant laws and regulations.

The minimum information required to sign a contract to manage your use of our products and services, and to enable us to fulfill our legal obligations in anti-money laundering and crime and fraud prevention, is personal data and contact information, verification information, PEP information (as defined below), and financial information. Without this information, we would not be able to start or continue providing our services or products to you.

The information we collect from you is as follows:

- Full name, address and contact details (e.g. email address, phone number, etc.), date of birth, place of birth, gender, nationality ("**Personal Data and Contact Information**");
- Bank account info, wallet address, credit card details, your source of funds, asset and liability details, and information related to economic and trade sanctions lists ("**financial information**");
- Trading account balances, trading activity, your inquiries and our responses ("**Trading Information**");
- Information about whether you (or someone close to you) hold important public office ("**PEP Information**");
- Verification information, including information necessary to verify your identity, such as a passport, driver's license, selfie photo/video, login credentials, or government-issued identification card ("**Verification Information**");
- Other personal data or business and/or identity information - information that we, in our sole discretion, consider necessary to comply with legal obligations under various Anti Money Laundering obligations, such as the European Union Article 5 Anti Money Laundering Directive and the US Bank Secrecy Act ("**Other Information**").

The information we automatically collect about you:

- Browser Information - information automatically collected from your browser by analyzing system providers, including your IP address, domain name, any external pages that direct you to us, your login information, browser type and version, time zone settings, browser plug-in type and version, operating system and platform ("**Browser Information**");
- Log information - information generated when you use BiyaPay branded websites, applications, services or tools operated by BIYA GLOBAL LIMITED, which is automatically collected and stored in our log records. This may include device information such as Device ID symbols, device operating system and model, device storage, media access control (MAC) address and user identification module (SIM)

information, signals related to user behavior and device interaction, marketing identifiers, battery usage, location information, network address, system activity, and any internal and external information related to the pages you visit, including the complete Unified resource locator (URL) clickstream to, through, and from our website or application (including date and time, page response time, download errors, length of time certain pages are accessed, page interaction information such as scrolling, clicking, and mouse hovering, and methods used to leave the page). " **Log information** ").

We receive information about you from other sources.

We also obtain information about you from third parties (such as your payment provider, service providers that assist with Anti Money Laundering, anti-fraud, and security compliance) and from publicly available sources. For example:

- The bank you use to transfer money to us will provide us with your basic personal data, such as your name and address, as well as your financial information, such as your bank account details.
- Your business partners may provide us with your name and address, as well as financial information.
- AD Network, analytics providers, and search information providers may provide us with anonymous or de-identified information about you, such as confirming how you found our website.
- Our service providers may provide us with information related to fraud, security, sanctions, and Anti Money Laundering and other risks, such as confirmation of identity attributes, as well as information on any attributes related to such matters.
- Credit reference agencies may provide us with your personal data during the credit reference process.
- We may read and store blockchain, other publicly available ledgers, or data in the public domain.

5. Our legal basis for processing personal data

Why do we process your personal data?	Legal basis	Categories of personal data
Provide our products and services, including payment processing and completing customer onboarding processes	Performance of the contract	Personal profile and contact information, financial information, transaction information, PEP information (if relevant), verification

		information, and other information.
Conduct or arrange for credit or identity checks	Comply with the legal obligations of "know your customer" and customer due diligence supervision. Such processing is also in our legitimate interest to prevent and detect potential criminal and/or fraudulent behavior and protect our business.	Personal profile and contact information, financial information, transaction information, PEP information (if relevant), verification information, and other information.
For the purpose of identity verification, compliance with court orders, tax laws or other reporting obligations, and Anti Money Laundering control.	Comply with the legal obligations of Anti Money Laundering Law, Financial Services Law, Company Law, Privacy Law, Tax Law, and other relevant laws. The rules and regulations of regulatory agencies also apply to us.	Personal profile and contact information, financial information, transaction information, PEP information (if relevant), verification information, and other information.
Manage our products and services, provide you with information about our products and services and review your ongoing needs, troubleshoot our products and services, improve our products and services, and develop new products and services.	In order to ensure the effective provision of our products and services and meet the needs of our customers, we have a legitimate interest in managing our products and services, providing you with information about our products or services, troubleshooting our products and services, and reviewing our customers' ongoing needs. Improving our products and services (including support services) and developing and	Personal profile and contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information.

	marketing new products and services is also in our legitimate interest.	
Provide information to KOLs (partners who promote BiyaPay and drive new business)	It is in our legitimate interest to use affiliates to attract new business leads and to pay fees to those affiliates when they generate revenue.	Deidentified transaction information
Promote our products and services	Agree means you agree to receive marketing information directly. We rely on our legitimate interests to process information about our products, services, and how blockchain technology is used to determine marketing strategies.	Personal data and contact information, transaction information, other information, browser information, and log information
Conduct an investigation	We have a legitimate interest in sending you surveys and conducting such surveys to collect information about how our products and services work for Client Server and how we can improve our products and services. Your participation in these surveys will be based on your consent.	Personal data and contact information, transaction information, other information, browser information, and log information
Conduct Data Analysis. Our website pages and emails may contain web beacons or pixel tags or any other similar type of Data Analysis tool that allows us to track receipts of communications and count	If your personal data is completely anonymous, we do not need a legal basis because this information will no longer constitute personal data. If your personal data is not in anonymous form, we have a	Personal data and contact information, financial information, transaction information, other information, browser information, and log information

the number of users who have visited our web pages or opened our communications. We may aggregate your personal data with the personal data of our other customers on a de-identified basis (i.e., delete your personal identifier) for more rigorous statistical analysis of general patterns, so that we can provide better products and services.	legitimate interest in continuously evaluating this personal data to ensure that the products and services we provide are relevant to the market and customers.	
To ensure accurate actual address records are submitted when creating an account, we use Google's address confirmation service	It is our legitimate interest to ensure that the address submitted by the customer is accurate. For more information, please refer to Google's Privacy Policy	Address information
For internal business purposes and record keeping	We have a legal obligation to retain certain records. Such processing is in our legitimate interest for internal business and research purposes and for record-keeping purposes. Retaining records to ensure that you comply with your contractual obligations under the agreement governing our relationship with you ("Terms of Service") is also in our legitimate interest.	Personal data and contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information
Enforce and defend our	Enforcing and defending our	Personal data and

rights, including initiating legal claims, preparing defenses in legal proceedings, handling legal or administrative litigation before courts or statutory bodies, and investigating or resolving issues, inquiries, and/or disputes.	rights and ensuring timely and effective investigation and resolution of issues, inquiries, and/or disputes is in our legitimate interest.	contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information
In order to comply with applicable laws, subpoenas, court orders, other judicial proceedings, or any applicable regulatory requirements	Legal obligations. We will disclose personal data when we receive a legally binding request for disclosure of personal data from law enforcement or other agencies, or when we have a legitimate interest in assisting law enforcement or other agencies in their investigations.	Personal data and contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information
Develop our overall pricing strategy and dynamically set prices for certain products and services	Using personal data to develop our general pricing strategy and dynamically set prices for certain products and services is in our legitimate interest. For more information on our pricing methods, please refer to our Terms of Service and Help Center.	Financial information, transaction information
Notify you of changes to our products or services and/or legal and regulatory rules and regulations	Legal obligations. We are generally required by law to inform you of changes to certain products or services or laws. We may need to notify you of changes to the	Personal profile and contact information, financial information, transaction information, PEP information (if relevant), and other

	<p>terms or features of our products or services. We need to process your personal data to send you these legal notices. Even if you choose not to receive direct marketing messages from us, you will continue to receive such messages from us. If such notices are not required by law, we have a legitimate interest in notifying you of such changes.</p>	information
<p>To effectively manage our business, for example, through the means and processes we adopt to safeguard our IT and system security, prevent potential crimes, and ensure asset security and access control.</p>	<p>Protecting our assets and systems, preventing and detecting potential crime and/or fraud, and ensuring security are in our legitimate interests.</p>	<p>Personal data and contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information</p>
<p>Update and verify your personal data in accordance with the relevant Anti Money Laundering compliance framework.</p>	<p>Legal obligations. Such processing is also in our legitimate interest to prevent and detect potential crimes and/or fraud and to protect our business.</p>	<p>Personal data and contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information</p>
<p>In order to better customize our services and</p>	<p>When we collect personal data for these purposes</p>	<p>Other information, browser information,</p>

content for you and identify you as a customer.	through the use of cookies, we will rely on your consent. Customizing our services and content for customers and identifying them is also our legitimate interest to ensure that customers receive services and content that are suitable for them.	and log information
Communicate with	It is in our legitimate interest to communicate with our customers or potential customers to ensure the effective delivery of our products and services and to manage our business.	Personal profile and contact information, financial information, transaction information, and other information
Receive third-party services, including administrative, legal, tax, compliance, insurance, IT, debt recovery, analytics, credit reference, authentication, research or other services	Generally speaking, obtaining such services from third parties is in our legitimate interest to ensure the effective delivery of our products and services and to manage and protect our business.	Personal data and contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information
For any purpose not specified above but for which you have instructed us to process your personal data	Agree	Personal data and contact information, financial information, transaction information, PEP information (if relevant), verification information, other information, browser information, and log information

If a legitimate interest or performance of a contract is not a recognized legal basis in your jurisdiction, we will rely on consent (express or implied, as the case may be) where consent is required.

6. Disclose your personal data

As part of processing your personal data for the above purposes, BiyaPay may disclose your personal data to any member of BiyaPay and third parties. For example, BiyaPay may disclose your personal data to any of our service providers and business partners for business or other legitimate purposes, such as professional consultants who have contracted to provide us with administrative, financial, legal, tax, compliance, insurance, IT, debt recovery, analysis, research, or other services.

If BiyaPay discloses your personal data to service providers and business partners in order to perform services requested by customers or fulfill our legal and regulatory obligations, such providers and partners may store your personal data in their own systems. We require them to protect the confidentiality of this personal data and comply with all relevant privacy and data protection laws.

BiyaPay may also disclose personal data when required by law, such as to government entities pursuant to a valid court order.

7. Where we store your personal information

Our operations are supported by a network of computers, servers, other infrastructure and information technology, as well as third-party service providers. We and our third-party service providers and business partners store and process your personal data in Singapore, the US, Hong Kong, and other parts of the world. Courts, law enforcement, and security agencies in these jurisdictions may be able to access your personal data using legal procedures.

8. Privacy when using digital assets and blockchain

Your use of digital assets may be recorded on a public blockchain. A public blockchain is a distributed ledger designed to immutably record transactions in a wide network of computer systems. Many blockchains accept forensic analysis, which can lead to the re-identification of transaction individuals and the leakage of personal data, especially when blockchain data is combined with other data.

Since blockchain is a decentralized or third-party network that is not controlled or operated by BiyaPay, we cannot delete, modify, or change personal data on such

networks.

9. Data retention

When personal data is no longer needed for legitimate processing purposes, we will delete any details that can identify you or securely destroy relevant records. After you are no longer our customer, for legal or regulatory reasons, we may need to retain records for a considerable period of time, such as when we need to retain information to help manage disputes or legal claims. In addition, we are subject to certain Anti Money Laundering laws, which may require us to retain the following information for a period of time after the end of our business relationship with you (such as 5 years):

- Copies of records we use to fulfill our customer due diligence obligations.
- Evidence and records to support transactions with you and your relationship with us.

If you choose not to receive marketing information, we will save your details on our prohibited list so that we know you do not want to receive this information.

If we are unable to delete your personal data for legal, regulatory or technical reasons, we may keep it for more than 5 years.

10. Cookie

Cookies are small text files that provide information about the device a visitor is using. Click on Cookie Settings in the footer of this page to learn more details about the types of cookies used by this website and why they are used, and to adjust your cookie settings. Cookie information usually does not directly identify you, but it can provide you with a more personalized web experience. As we respect your privacy, you can choose not to allow certain types of cookies, but doing so may affect website functionality.

11. Your rights to personal data

The following outlines the rights you have regarding the personal data we process. You may request to exercise these rights, subject to any restrictions imposed by applicable data protection laws.

Right of use

You can ask us to confirm whether we are processing your personal data, and if so, what information we are processing, and to provide you with a copy of that information.

Rectification

It is very important for us to ensure that your personal data remains up to date. We will take all reasonable measures to ensure that your personal data remains accurate, complete, and up-to-date. If your personal data changes, please notify us. If the personal data we hold about you is inaccurate or incomplete, you have the right to request correction. If we disclose your personal data to others, we will do our best to let them know about the correction. If you request it from us and it is possible and legal to do so, we will also notify you of who we have shared your personal data with.

You can notify us at any time that your personal information has changed by sending an email to the service@biyapay.com. BiyaPay will change your personal data at your instruction in accordance with applicable law. In order to continue processing such requests, in some cases we may require you to provide documentation that we need to retain personal data for regulatory or other legal purposes.

Erase

In some cases, you may request that we delete or remove your personal data. Such requests may be subject to any retention restrictions that we must comply with under applicable laws and regulations. If we have disclosed your personal data to others, we will inform them of the deletion request where possible. If you request it from us and it is possible and lawful to do so, we will also inform you of who we have shared your personal data with.

Processing restrictions

In some cases, you can ask us to prevent or prohibit the processing of your personal data, for example, if you question the accuracy of your personal data or object to our processing of personal data. This will not prevent us from storing your personal data. If we disclose your personal data to others, we will try our best to let them know about the processing restrictions. If you ask us and it is possible and legal to do so, we will also inform you of who we have shared your personal data with.

Data portability

In some cases, you have the right to obtain the personal data you provide to us in a structured, commonly used, and machine-readable format and to reuse it elsewhere or request that we transfer it to a third party of your choice (where technically feasible).

Objection

You can ask us to stop processing your personal data, and we will do so if we:

- Relying on our own or others' legitimate interests to process your personal data, unless we can demonstrate a compelling legal basis for processing or establishing, exercising or defending a legal claim.
- Processing your personal information for direct marketing purposes; or
- We process your personal data for research purposes, unless we reasonably believe that such processing is necessary for public interest reasons (such as regulatory or law enforcement agencies) to perform tasks.

Automated decision-making and analysis

If we make decisions based solely on automated processes (such as automated analysis) that affect your ability to access our products and services or have other significant impacts on you, you may request to be exempt from such decisions unless we can prove to you that such decisions are necessary for the conclusion or performance of a contract between you and us. Even if a decision is necessary for the conclusion or performance of a contract, you may object to the decision and request manual intervention. If we agree to such requests (i.e. terminate our relationship with you), we may not be able to provide you with our products or services.

Withdraw consent

You have the right to withdraw your consent to processing based on consent at any time. Please note that this will not affect the legality of processing based on consent or without consent before withdrawing your consent.

12. Changes to this Privacy Policy

We regularly review our Privacy Policy in light of new regulations, new technologies, and any changes to our business operations. Any personal data we process is subject to our most recent Privacy Policy. We will update the "Last Updated" date accordingly at the beginning of this Privacy Policy. Please check this Privacy Policy from time to time. We will post any material changes to this Privacy Policy on our website.

13. Our products and services are not intended for children

Our products and services are not directed at persons under the age of 18 (herein referred to as "children") and we do not knowingly collect personal data from children. If we become aware that we have inadvertently processed personal data from children, we will take steps permitted by law to delete that data from our records. BiyaPay will require child users to close their accounts and will not allow the use of our products and services. If you are a parent or guardian of a child and you become aware that a child has provided us with personal data, please contact us via service@biyapay.com.

14. Contact details

Any questions, complaints, comments and requests regarding this Privacy Policy are welcome and sent to service@biyapay.com.

