

1. Introduction

A22 INDUSTRY LTD operating through the brand name A22 (the "Company") is a company registered under number BC1336521 in Canada, address 422 RICHARDS STREET, UNIT 170 VANCOUVER BC V6B 2Z4 CANADA, and provides as "Money Service Business (MSB) ", hereafter as (the "Company", "website", "we", "our", "us"). The Company operating under its brand name A22 (<https://a22.finance/>), respects each individual's right to privacy. Our policy is composed in accordance with European Union General Data Protection Regulation (EU) 2016/679 (GDPR) and Law of the Canada on the Legal Protection of Personal Data.

The Company encourage you to read the Policy carefully as it forms part of the relevant A22 others our policies.

We collect, use and disclose personal information through our website and other online products and services that link to this Policy (collectively, the "Services") or when you otherwise interact with us. This is defined as collection for the purpose of provision of service(s) to you in accordance with our Terms and Conditions. Please note that if you refuse to share your Personal Information for this purpose we will not be able to provide our services to you.

Additional, this Privacy Policy explains how the Company processes information that can be used to directly or indirectly identify an individual ("Personal Data" - any information relating to you, as an identified or identifiable natural person, including your name, an identification number, location data, or an online identifier or to one or more factors of you as a natural person).

Any information stored on A22 platform is treated as confidential. All information is stored securely and is accessed by authorized personnel only. A22 implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

This policy also applies to personal data about each authorized representative of a client and about other persons or entities collected in the course of providing our services (such as directors of corporate clients).

2. Controller

The Company is the controller and responsible for your personal data. The Company has appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Policy and any privacy notice provided to you throughout the Services provided by the Company. If you have any questions about this Policy, including any requests to exercise your legal rights (processing connected to contractual relationships, data processing for advertising purposes, consent to data processing, data processing pursuant to legitimate interests / full description see the "Customers rights" section below), please contact us (see the "Information, Complaints and Contact" section below).

3. Information we may collect about you

The provision of Your Data is required from you to enable us to provide our services. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

3.1. When using the A22 services, we may collect and use the following data about you:

For Natural persons:

- full name;
- date of birth;
- personal code;
- your photographic identification;
- home address, including country of residence;

- residence verification information, such as utility bill details, phone bill or similar document;
- citizenship;
- nationality;
- email address;
- mobile phone number;
- proof of identity (e.g., driver's license, passport, or government-issued identity card with number of the document, date of issue and expiration, taxpayer identification number, government identification number);
- other personal information or commercial and/or identification information, whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under various anti-money laundering (AML) obligations, such as under the European Union's 5th AML Directive (your employment details, your trades, information on sources of your funds, your banking details including account numbers and routing number, payment card data, bank statement, and trading information); this point applies to: before the establishment of a business relationship and during of a business relationship;
- account information, such as username, password, account settings, and preferences;
- your IP address, Browser and Operating System information, geolocation details;

Additional for Legal persons:

- the name or business name of the legal person;
- the registry code or registration number and the date of registration;
- the names of the director, members of the management board or other body replacing the management board, data of beneficial owner and their authorization in representing the legal person;
- the details of the telecommunications of the legal person;
- legal documentations;
- filled questionnaire form.

3.2. The source of the account data is user who opens an account. The account opening data will be used and processed for the purposes of performing a detailed Know Your Customer (KYC) procedure according to necessary Anti-Money Laundering and Anti-Terrorist Regulations. Users are visitors of the A22 website and therefore their Personal Information are collected as described in the previous section. These Personal Information will be used for operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with Users.

A22 will use users' e-mail phone number and residential address for communication purposes with users regarding: login, registration, transactions, orders, safety requirements, notifications about safety measures, reminders about the status of orders, transactions, user profile level, and other necessary communication with users. User will also receive occasional notifications about new token listing and other promotions.

3.3. We use different methods to collect data from and about you through the following:

- registration process;
- provision of the Services;
- subscriptions;
- competitions, promotions, surveys;
- third party publicly available sources, e.g. analytics providers such as Google, advertising networks, search information providers;
- contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- identity and Contact Data from publicly available sources, e.g. government gateways.

3.4. You agree to keep us updated if any of the information you provide changes during your relationship with us. You can update the information in your profile at any time by visiting the "Account" page in the Settings menu.

3.5 Automatically Collected Information

When you access or use our Services, we automatically collect information about you, including:

- log information: we collect log information about your use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Services;
- device information: we collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information;
- activities on the Website: we collect records of activities on the Website, including, any content you post, your account details, the time, value and currency of any deposit, withdrawal, or transaction made and the payment method;
- location information: in accordance with your device permissions, we may collect information about the precise location of your device;

4. Legal basis for processing personal data

Reasons we can collect and use your personal information is lawful basis for processing. Under EU data protection law, there must be a lawful basis for all processing of personal data (unless an exemption or derogation applies). We rely on:

- to carry out our obligations owed to you;
- to comply with our regulatory and compliance with our legal obligations;
- legitimate interest (data will only be processed where it is necessary for the purposes of the legitimate interests pursued by A22, and these interests or fundamental rights are not overridden by the interests, rights and freedoms of the data subject and that the processing would not cause unwarranted harm:
 - opening, verification and ongoing management of your account;
 - to monitor any content, you post;
 - to monitor trading activity on A22, including by detecting inconsistencies in payments and trades and looking out for potentially illegal activities;
 - to determine whether a payment method is being abused;
 - to investigate and to manage enquiries, disputes and legal proceedings and to comply with court orders, mandatory dispute resolution determinations and mandatory government authority or law enforcement orders or directions;
 - to participate in crime prevention, legal and regulatory compliance and to assist regulatory, cybercrime, data and information protection agencies and police with their inquiries and enforcement, even if not compelled to do so;
 - maintenance of legal documentation;
 - to administer transactions including deposits, chargebacks and payments;
 - assess your risk score according to parameters determined by A22;
 - set up security measures to secure your account, including without limitation, to carry out two-factor authentication.

5. Disclosure of your personal information

We will not rent or sell your information to third parties outside A22 without your consent. We also impose strict restrictions on how our processors can use and disclose the data we provide. Here are the types of third parties we share information with:

- payment processing, whether in cryptocurrency or legal tender. Related processing operations are necessary for the performance of a contract with you and for compliance with legal obligations to which we are subject to. This means that we may submit your personal and/or

company information, including identification documentation and proof of address documentation to third party service providers and providers of banking and/or payment services if you request to use such services;

- our contractors providing software for identity verification purposes (client on-boarding, client identity verification, including PEPs and sanctions);
- we seek to recover debt or in relation to your insolvency;
- we seek to protect A22 from financial and insurance risks;
- we may also share users' personal information with law enforcement or regulatory agencies, as may be required by law. In certain cases, we may not be able to inform you of such sharing of data due to legal restrictions;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, and safety of A22 or others;
- IT hosting companies, who need access to such information to carry out work on our behalf;
- researching and development: to enable internal research and development purposes so as to develop the Services;

Any third party which receives or has access to Personal Information shall be required by us to protect such information and to use it only to carry out the services they are performing for you or for A22, unless otherwise required or permitted by law. Such a third party, except for regulatory authorities, would be contractually bound to adhere to the same security and confidentiality policies as A22 and assume the same responsibilities as A22.

We will ensure that any such third party is aware of our obligations under this Privacy Policy and we will enter into contracts with such third parties by which they are bound by terms no less protective of any Personal Information disclosed to them than the obligations we undertake to you under this Privacy Policy or which are imposed on us under applicable data protection laws.

Social Sharing Features

If you have elected to use one of our applications provided via social networks (such as Facebook, Twitter etc.), our application will access your social network account general information which includes your name and username in the social network, profile picture, gender, networks, user ID, list of friends, and any other information you have shared depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

6. Security

Personal data is processed in a manner that ensures appropriate security and confidentiality, including preventing unauthorized access to or use of personal data. The Company shall protect all data from loss, misuse, unauthorized access or disclosure, alteration, or destruction. The Company shall not be liable for unlawful or unauthorized use of any personal information due to misuse or misplacement of the passwords, negligent or malicious use.

The Company maintains policies and procedures and has measures in place in order to ensure high levels of protection of personal data which include, inter alia, appropriate restrictions on permissions of access to personal information, controls and monitoring of storing and distribution of data as well as Data Protection Impact Assessments.

All employees and providers of the Company are required to follow certain privacy and security policies and procedures. The Company is not responsible for the security and privacy of any Third Party and/or Social Networking services or any information collected by them. It is recommended that a User should always review the said providers' privacy policies.

Failure to Provide Personal Information

You have a choice to supply any or all of the personal data required. However, missing information may have as a result failure of establishment of a business relationship with the Company due to not compliance with the relevant Laws and Regulations.

7. IP Addresses

We may collect information about your computer, including where available your IP address, operating system and browser type for system administration, and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

8. Cookies Policy

Cookies / Cookies are a kind of short-term memory which is stored in a visitor's and/or client's browser and enables Services to 'remember' little bits of information between pages or visits. Some of the purposes of installation of Cookies or similar applications may also require the separate consent from you.

Use of Cookies / Use of cookies and other tracking technologies are standard across the Services through which personal data is collected. You can control and manage the use of cookies through the Services and more information is provided below.

The Company uses cookies to enable it to provide you with a better experience in using our Services. If you do not wish to receive cookies, you may be able to change the settings of the browser or mobile device to refuse all cookies or to receive notification each time a cookie is sent, thereby giving the choice whether to accept it or not. However, this may impair the quality of the Services that are being provided in relation to the trading account.

The Company shall not be liable for misuse or loss of personal data resulting from cookies for Services that the Company does not have access to and/or control over.

Consent to Cookies / Consent to our cookie policy is obtained through the cookie permission settings in your internet browser or mobile device and throughout your acceptance for the use of the Company's Services. If you do not wish to receive cookies, you can change the settings of the internet browser or mobile device to refuse all cookies or contact us.

Types of Cookies / There are various types of cookies needed to be used in order to enable the provision of the Services, which include, inter alia, absolutely necessary cookies essential to enable navigation through the Services, performance cookies which are used to improve use of the Services, functionality cookies which are used to remember changes in choices a User requested and marketing cookies used to evaluate performance of advertisements and visits on the Services.

Technical Cookies and Cookies serving aggregated statistical purposes

Activity strictly necessary for the functioning of the service:

Use of cookies to save your session and to carry out other activities that are strictly necessary for the operation of the same, for example in relation to the distribution of traffic.

Activity regarding the saving of preferences, optimization and statistics:

Use of cookies to save browsing preferences and to optimize your browsing experience; among these cookies are, for example, those to set the language and the currency or for the management of first party statistics employed directly by the owner of the site.

Other types of Cookies or third-party tools

Some of the services listed below collect statistics in aggregated form and may not require your consent or may be managed directly by you – depending on how they are described – without the help of third parties.

If any third-party-operated services are listed among the tools below, these may be used to track your browsing habits, in addition to the information specified herein and without the owner's knowledge.

Interaction with external social networks and platforms:

These services allow interaction with social networks or other external platforms directly from the pages of the Services; the interaction and information obtained are always subject to your privacy settings for each social network; if a service enabling interaction with social networks is installed it may still collect traffic data for the pages where the service is installed, even when you do not use it.

Google +1 button and social widgets (Google Inc.):

The Google button and social widgets are services allowing interaction with the Google+ social network, provided by Google, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Facebook Like button and social widgets (Facebook, Inc.):

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network, provided by Facebook, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Tweet button and social widgets (Twitter, Inc.):

The Tweet button and social widgets are services allowing interaction with the Twitter social network, provided by Twitter, Inc.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Linkedin button and social widgets (LinkedIn Corporation):

The LinkedIn button and social widgets are services allowing interaction with the LinkedIn social network, provided by LinkedIn Corporation.

Personal data collected: Cookie and Usage data.

Place of processing: USA

YouTube button and social widgets (YouTube Corporation):

The YouTube button, video and social widgets are services allowing interaction with the Youtube social network, provided by YouTube, LLC.

Personal data collected: Cookie and Usage data.

Place of processing: USA

Statistics

The services contained in this section are used to monitor and analyse traffic data and are used to keep track of your behavior.

How can you manage the installation of Cookies?

You can control and/or delete cookies as you wish directly from within your own internet browser or mobile device and prevent – for example – third parties from installing them. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. It is important to note that by disabling all Cookies, the functioning of the Services may be compromised (such data is used by us to meet legal requirements, as well as for ongoing fraud and risk monitoring purposes, choosing to remove or disable location services may interfere with your use and functionality of the A22 exchange services). For further information about cookies and how to disable them, please refer to www.allaboutcookies.org.

9. Automated Analysis of Your Personal Information

We use the personal information you provide to us, or that we gather when you use our services, to tailor A22 to your profile and to assign you a risk score. For example, if you frequently trade in a specific virtual currency, we may use this information to inform you of new product updates or features that may be useful for you. When we do this, we take all necessary

measures to ensure that your privacy and security are protected, and we only use anonymous or de-identified data. A22 will carry out this analysis automatically, and in most cases without human intervention (in order to improve your experience, or to help fight financial crime). If you have any questions about the automated analysis of your personal information, please contact us (see "Information, Complaints and Contact" below).

10. Customers rights

Under the General Data Protection Regulation you have a number of important rights. In summary, those include rights to:

- Fair processing of information and transparency over how we use your use personal information;
- The right to access personal data: via a Subject Access Request. Your request should be made in writing to support@a22.finance and/or A22 INDUSTRY LTD address 1771 ROBSON STREET – 1252 VANCOUVER, BC, CANADA V6G1C9. We may ask you for proof of identity before providing you with the data. There is usually no charge for such requests, however in limited circumstances we may be able to charge an administrative fee (and we will inform you in response to your request if that is the case);
- The right to request that your personal data is corrected if it is found to be inaccurate: require us to correct any mistakes in your information which we hold;
- The right to request that your personal data is erased where it is no longer necessary. In some circumstances this right may not apply e.g. if there is some other compelling reason for us to keep or process your data (and we will inform you in response to your request if that is the case), please see "Retention of Personal Information" section below;
- Right to data portability: to receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party (another controller) in certain situations;
- The right to withdraw consent to processing at any time, where relevant i.e. where we are relying on your consent to process the data and not another legal reason for processing;
- The right to object at any time to processing of personal information concerning you for direct marketing;
- The right not to be subject to a decision which is based solely on automated processing, including profiling which produces legal effects concerning them or similarly significant affects them;
- The right to object in certain other situations to our continued processing of your personal information.
- Otherwise restrict our processing of your personal information in certain circumstances.

11. Retention of Personal Information

We store the information we collect on you for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation.

If you have an account with A22, we will store your personal information for as long as you maintain that account, and after you cease holding an account, for as long as we are required to by laws and regulations that are applicable to us (in order for us to comply with our record keeping obligations under the Money Laundering Regulations / Directive (EU) 2018/843 and The Law of the Canada on prevention of money laundering and terrorist financing).

Your funding of Digital Assets (cryptocurrencies), may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead

to de-anonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data. Because blockchains are decentralized or third-party networks which are not controlled or operated by A22, we are not able to erase, modify, or alter personal data from such networks.

12. Links

There may be links from our Sites to other sites and resources provided by third parties. This Privacy Policy applies only to our Sites. Accessing those third-party sites or sources requires you to leave our Sites.

We do not control those third party sites or any of the content contained therein and you agree that we are in no way responsible or liable for any of those third party sites, including, without limitation, their content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to or arising from those sites. We encourage you to review all policies, rules, terms and regulations, including the privacy policies, of each site that you visit.

13. Minors

Please note that our services are exclusively offered to individuals at least 18 years old. We do not process any Personal Information of children under this age. If you are a Minor, you should not download or use any of our services nor provide any personal information to us.

If we become aware that a Minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at support@a22.finance

14. Data transfer of Information to Other Countries

When using our services, your data is processed and stored in the EU and other countries. We and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it.

We provide adequate protection for the transfer of personal data to countries outside of the EEA through a series of inter-company agreements based on the Standard Contractual Clauses authorized under EU law. You are entitled to obtain a copy of these agreements by contacting us using the contact information below.

15. Marketing

We may share personal data with third parties to help us with our marketing and promotional projects, or sending marketing communications. You have the right to ask us not to process your Personal Information for marketing purposes. You can exercise your right to prevent such processing by unchecking marketing preferences check box on "open account" step or by contacting us at any time on support@a22.finance. In these cases we can still contact you regarding our business relationship with you, such as account status and activity updates, survey requests in respect of products and services we have provided to you after you reserve from us, reservation confirmations or respond to your inquiries or complaints, and similar communications.

16. What happens in the event of a change of control?

If we sell or otherwise transfer part or the whole of A22 or our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your information such as name and email address and any other information collected through the Service may be among the items sold or transferred. You will continue to own your User Content. The buyer or transferee will have to honor the commitments we have made in this Privacy Policy.

17. Information, Complaints and Contact

If you have any further questions regarding the data A22 collects, or how we use it, then please feel free to contact us by email at support@a22.finance or in writing at A22 INDUSTRY LTD address 1771 ROBSON STREET – 1252 VANCOUVER, BC, CANADA V6G1C9.

Please be notified that A22 is not in any partnership with entities who represent themselves as customer support agents, providing customer support services via phone and/or social media and promise to help solve your issues for money. Remember, customer support is provided only via the a22.finance website and is always provided free of charge.

If you discovered what you believe is a fraud, phishing, or scam which impersonates a22.finance please email us at support@a22.finance

You have a right to lodge a complaint with a supervisory authority, to enforce your rights, as specified above.

18. Changes

We keep our privacy policy under regular review. Our Website policies, content, information, promotions, disclosures, disclaimers and features may be revised, modified, updated, and/or supplemented at any time and without prior notice at the sole and absolute discretion of A22. If we change this Privacy Policy, we will take steps to notify all users by a notice on our Website and will post the amended Privacy Policy on the Website.