

PRIVACY POLICY

Effective Date: November 25, 2024

This Privacy Policy was last updated on January 29, 2024

Section I. Privacy Policy Overview

This privacy policy (“**Privacy Policy**” or “**Policy**”) describes how NEXM INC., NEXUM HUB INC. and NEXUM LENDING LIMITED (each a “**Company**” and together the “**Companies**” or “**us**” or “**we**” or “**our**”) collects, stores, and uses personal information about you when you visit our website at nexum.app, nexum.finance and nexum.ai (the “**Site**”), our social media account on Twitter @CoinNexum, our Telegram channels nexum_offical and CoinNexum, our Discord account Nexum Official, and our YouTube channel Nexum Platform, use our mobile application or other media platforms, purchase our products, or use services supplied by or on behalf of us (collectively, “**Services**”). In this Privacy Policy, “you” means any person who visits our Site, uses our Services, emails, texts, or calls us on the phone. This Privacy Policy is provided to explain how information, including personal information, is collected, stored, used, and disclosed.

All updates to this Privacy Policy are published at the top of this page, with a time-date reference for your convenience. Each Company reserves the right in its sole discretion to amend this Privacy Policy at any time. Your continued use of the Services and the Site after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates. This Privacy Policy applies to all our other websites that post this Privacy Policy. This Policy does not address the privacy, information collection, use, disclosure and/or retention practices of any third-party entities. Please review any applicable third-party entity’s privacy policy for more information regarding such third-party entity’s own privacy or information practices. No Company has any liability with respect to the use or misuse of personal information by such third-party entities or any failure to comply with such third-party entities’ privacy policies. If you choose to use our Site or Services, your use and any dispute over privacy is subject to this Privacy Policy and our Terms of Use, including limitations on damages, resolution of disputes and application of the law of England and Wales. By accessing our Site or using our Services, you confirm that you have read and accepted the terms of this Privacy Policy.

Section II. Consent

By accessing, browsing, or otherwise using the Site or our Services, you expressly consent to our collection, storage, use, and disclosure of your information, including personal information, as described in this Privacy Policy and any related terms of service relevant to our Services. Please read this Privacy Policy and the related terms of service carefully to understand our practices and your options. If you do not agree to the terms of this Privacy Policy, you must not use our Site or our Services.

Section III. Privacy of Children

Our Site and Services are not intended for children. You must be at least eighteen (18) years of age to use the Site and/or Services related to the Site. If we learn or have reason to suspect that a user is under age eighteen (18), we will promptly delete any personal information in that user's account.

Section IV. What is Personal Information?

For the purposes of this Privacy Policy and compliance with applicable law and EU General Data Protection Regulation ("GDPR"), and in accordance with applicable law and GDPR, personal information (or personal data) relating to an identified or identifiable person, or which identifies, relates to, describes, is reasonably capable of being associated with, or could be linked, directly, or indirectly, with a particular individual or household. Personal information does not include publicly available information.

Section V. Categories of Information We Collect

We collect the information you give us when you contact us, access the Site, opt-in to receive alerts or other information from us via email, text, or instant message, or use our Services. We collect your personal information for the purposes described in this Privacy Policy. The information we collect includes:

- **Identifiers and contact information**, such as your name, address, phone number, email address, or social media IDs;
- **Purchase or other commercial information**, such as specific activities like digital asset lending and borrowing transactions, as well as your home or billing address, and contact information (such as for receipts or order updates);
- **Payment information**, such as your digital wallet information, payment method and payment information (such as debit or credit card number and information), and billing address. We also store your public key if you have linked a digital wallet to your account or have provided the same to us;
- **Preference information**, such as your contact and marketing preferences, interests, opinions, and brand and merchandise interests;
- **Profile and account information**, which may include contact, purchase, and preference information as well as your account password and other information about your profile or account;
- **Communications and interactions**, which may include feedback, comments, testimonials, reviews, email messages, chat sessions, text messages, and phone calls that we exchange with you;
- **Demographic information**, which may include age or birthdate, gender, ZIP code, and other information about you;

- **Customer surveys**, we may periodically conduct both business and individual customer surveys. Your personal information and responses will remain strictly confidential, even if the survey is conducted by a third party. Participation in our customer surveys is voluntary;
- **Call recordings**, including information about your call and that you share when you call us on the phone;
- **Location or geolocation information** of your device that you use to access our Site, if your device settings allow us to collect location information;
- **Device and browsing information and other Internet activity information**, including information about your phone, tablet, computer, or device, and online browsing activity (collectively, “**automatically collected information**”). Automatically collected information may include IP addresses, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet Service Provider information. Automatically collected information also may include information about when and how you access and use our Site, such as the date and time of your visit or use, the websites you visit before coming and after leaving our Site, how you navigate and what you search for using our Site, the Site pages and items you view using our Site, and the items you purchase; and
- **Inferences** about any of the information above that may relate to your preferences, or other matters. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends and to learn more about the demographics of our users.

If you do not provide us with your personal data, you may not be able to register for an account and some features of the Site may be unavailable to you.

Section VI. How We Collect Information (Sources)

We collect information on our Site and during calls and communications with you. We also obtain information from you and from third parties. For example, we collect and obtain information:

- **When you engage** in a transaction with us or interact with a representative of any Company, including but not limited to making a purchase, interacting with a salesperson, visiting or contacting us, registering for an online account, participating in a contest or sweepstakes, responding to a survey, engaging in a promotional activity, applying for employment, or signing up for emails or marketing;
- **From Wi-Fi and mobile devices**, such as information about your device when you use our Site or Services;
- **From third parties**, such as service providers that we use, analytics companies, advertising networks and cooperatives, demographic companies, third parties that provide us with information about you and the different devices you use online, and other third parties that we choose to collaborate or work with;

- **From social media platforms and networks** that you use in connection with our Site or mobile application, or that share or allow you to share information with us, such as Facebook, Twitter, Pinterest, and Instagram. For example, if you use functionalities, plugins, widgets, or tools from social media platforms or networks in connection with our Site (e.g., to log into an account, or to share inspiration, finds, purchases, and other content with your friends and followers on social media), we will collect the information that you share with us, or that those social media platforms or networks share with us. For more information about social media platform and network privacy practices, please review the privacy policies and settings of the social media platforms and networks that you use;
- **Using cookies and automatic collection methods.** For example, we and third parties we work with may collect information from the computer, tablet, phone, or other device that you use to access our Site or use our Services, or that you use to open an email or click on an advertisement from us. Methods we use include:
 - o Cookies (which may be session-based or persistent, and are typically small data files that are stored on your hard drive or in connection with your Internet browser);
 - o Web beacons or tags (small images embedded into websites or emails that send information about your computer, tablet, phone, or other device when you visit our website, use our mobile application, or open an email we send to you);
 - o Website and mobile application log files (which we tend to create automatically in connection with access to and use of our website and mobile application);
 - o Flash cookies or Local Stored Objects (which may be placed using Adobe Flash software); and
 - o Other technologies (which may be similar to or different than the methods noted above).

Cookies are used to help us understand your preferences for future visits based on previous or current Site activity. We also use cookies to compile aggregate data about Site traffic and Site interaction so that we can offer better Site experiences, tools and Services in the future. You may choose to have your computer warn you each time a cookie is being sent. Your browser can also be set to block cookies, but some features of the Site or our Services may not properly work if you do this. You can make these changes in your browser settings, however, since each browser is a little different, look at your browser's "Help Menu" to learn the correct way to modify your cookies settings.

Section VII. How We Use Information

We use the information that we collect to conduct our business and to provide you with the best possible products, services and experiences. We also may combine any or all of the information that we collect or obtain. Examples of how we use information include:

- **To provide you with products and services**, such as to: fulfil your service orders and process your payments; process, maintain and service your account(s); and to provide you with products and services that we think you will like;
- **To respond to you**, such as when you: place a service order; call us; make a request or inquiry; complete a survey; or share a comment or concern;
- **For personalization of your experiences with us**, including to: remember your interests and preferences; customize the products and services we share with you; facilitate your interactions with our representatives; track and categorize your activity and interests on our Site, including by identifying the different devices you use; and to enrich your experience on our Site;
- **For marketing and advertising**, such as to: send you marketing and advertising communications, and to customize the marketing and advertising that we show you (we offer choices about marketing and advertising as noted in the Your Choices section below);
- **For analytics**, such as to: understand how you use our Site and our Services; determine the methods and devices used to access our Site; troubleshoot technical difficulties and errors; and improve Site functionality;
- **For our business purposes**, such as: to operate and improve upon our business and lawful business activities; to maintain our programs, accounts, and records; for research; to determine your satisfaction with our products and Services; to detect and prevent fraud or misuse of our Services; and for any other business purpose that is permitted by law; or
- **For legal and safety purposes**, such as to: defend or protect us, our customers, you, or third parties, from harm or in legal proceedings; protect our rights; protect our security and the security of our customers, employees, and property; respond to court orders, lawsuits, subpoenas, and government requests; address legal and regulatory compliance; respond to an emergency; and notify you of product recalls or safety.

Section VIII. Whom We Share Information With

Except as disclosed in this Privacy Policy, we do not share your personal information with any parties other than the other Companies, its parents, affiliates, subsidiaries or related entities, and in no event will we ever sell or rent your personal information. We may share personal information with third parties for other purposes. For example, we may share personal information with:

- **Our family of brands and companies**, owned or controlled by us, including our affiliates, parents, and subsidiaries;
- **Third parties and service providers** that provide products or services to us, that help us market or advertise to you (including co-branded marketing and advertising), or that provide services to you on our behalf. We may use third parties or service providers to help with managing our relationship with you, auditing interactions and transactions with you, processing your payments,

to us or on our behalf, addressing security, fixing errors, helping us with advertising or marketing, maintaining accounts and providing customer service, helping with our internal research, verifying service quality or safety, and performing any of the other actions or activities allowed under this Privacy Policy;

- **Social media platforms and networks** such as Facebook, Google, Twitter, Pinterest, and Instagram that offer functionalities, plugins, widgets, or tools in connection with our Site (e.g., to log into an account, or to share inspiration, finds, purchases, and other content with your friends and followers on social media). If you choose to use these functionalities, plugins, widgets, or tools, certain information may be shared with or collected by those social media companies—for more information about what information is shared or collected, and how it is used, see the applicable social media company's privacy policy;
- **Parties to business transactions** such as those we deal with in mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party; and
- **Additional third parties** such as law enforcement, government entities, courts, or other third parties as required or allowed by applicable law, such as for the legal, protection, and safety purposes described under the "How We Use Information" section above, or otherwise to help prevent harm or fraud to us, you, our customers, or other third parties. We also may share personal information with third parties upon your request or with your approval, though we may not be able to accommodate all requests. Finally, we may also share aggregated and/or anonymized data with others for their own uses.

We do not sell, trade, or otherwise transfer to outside parties your personal information, outside of the situations detailed above, unless you consent otherwise. Our ability to use the information, and share it as outlined in Sections VII and VIII, is controlled by your consent, or by contract if you have created an account, to the terms of this Privacy Policy, which you may choose to withdraw at any time.

Section IX. Security, Protection and Storage of Your Personal Data

We take the security of your personal information seriously and use reasonable electronic, personnel and physical measures to protect information from loss, theft, alteration, or misuse. However, in general, information transmitted over the Internet, including blockchain technology, may not be entirely secure, and thus we cannot assure the absolute security of your personal information. Please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee that only authorized persons will access your information. We are not responsible for third-party circumvention of any privacy settings or security measures.

Wherever we or a trusted third-party service collects sensitive information (such as credit card data), that information is encrypted and transmitted in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser or looking for "https" at the beginning of the website address, also known as a URL, of the web page. When you execute a transaction at our establishment using a credit card, our payment processor securely handles your credit card data, ensuring it is encrypted through PCI-DSS compliance. Subsequently, the transaction information is promptly deleted once deemed unnecessary. We uphold strict standards and never transmit sensitive financial details via email. We encourage you to take steps to help protect the confidentiality and security of your account and personal information, including by doing the following:

- Reviewing your account periodically and immediately reporting any unexpected activity or unrecognized information;
- Installing the latest security updates and anti-virus software on your computer to help prevent malware and viruses;
- Using complex passwords (a minimum of 7 alpha/numeric cAsE sEnsitive characters);
- Not using the same password on more than one website;
- Not sharing your password with others;
- Password protecting your computer and mobile device; and
- Signing out/logging off of website sessions so that your session is closed, especially when using a public computer.

We are dedicated to protecting all personal information as is necessary. However, you are responsible for maintaining the confidentiality of your personal information by keeping your password confidential. You should change your password immediately if you believe someone has gained unauthorized access to it or your account. If you learn of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody, you should notify us immediately.

Section X. Your Choices and Access Requests

You have the right to request that we disclose what personal information we collect, use, or is disclosed, and we strive to offer you choices about how personal information is used and shared. Your choices include:

- **Social Media Platforms and Networks.** We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about sharing information from those platforms and networks with us.
- **Email Choices.** You can opt-out of marketing or advertising emails by using the “unsubscribe” link or mechanism noted in marketing or advertising emails you receive from us. You may also request to opt-out of marketing or advertising emails by contacting us through one of the methods specified in the “Contact Us” section below and sharing the email address at which you are receiving marketing or advertising emails.

- **Access Requests.** If you have registered for an online account, we allow you to access and update certain personal information that you have provided to us by logging into your online account and using the features and functionalities available there. Unless alternate procedures are noted for your state in the “Notices, Disclosures, and Jurisdiction-Specific Rights” section below, you may also make a request for access to your personal information by sending an email or writing to us at the address specified in the “Contact Us” section below. Only you, or a person legally authorized to act on your behalf (an “**Authorized Agent**”), may make a verifiable consumer request related to your personal information. We are not able to grant all access requests, and we may request additional information from you in order to verify your identity before accommodating an access request.

You may have additional rights in the state in which you reside. Please see the “Notices, Disclosures, and Jurisdiction-Specific Rights” section below for additional information.

Section XI. Updating your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

Section XII. Notices, Disclosures, and Jurisdiction – Specific Rights

- **Links to Other Websites and Services.** Our Site may provide links to other Internet sites, content, or videos (embedded or direct links) maintained by third parties. We are not responsible for the sites, content, or videos accessed via the links and we have not reviewed the privacy practices of those third parties. We encourage you to review the privacy practices of those third parties.
- **Browsers Do Not Track Signals.** While we strive to offer you choices when you use our Site and Services, we do not promise that we will be able to receive or honour web browser Do Not Track signals.
- **International Customers.** If you provide personal information through our Site, you agree that the personal information will be transferred to and processed in the United Kingdom, the EEA and any other country or jurisdiction at our sole discretion. The laws that apply to the use and protection of personal information in the United Kingdom, EEA or other countries or jurisdictions in which we transfer or process personal information may be different than the laws and protections in your own country. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below. You may also request a copy of any Standard Contractual Clauses we use for the transfer of your data outside of the EEA, by contacting us using the contact information below.

- **European Privacy Rights.** If you are a data subject in Europe, you have the right to access, rectify, or erase any personal data we have collected about you through the Site or Services. You also have the right to data portability and the right to restrict or object to our processing of personal data we have collected about you through the Site or Services. In addition, you have the right to ask us not to process your personal data (or provide it to third parties to process) for marketing purposes or purposes materially different than for which it was originally collected or subsequently authorized by you. You may withdraw your consent at any time for any data processing we do based on consent you have provided to us. Please note, however, that this will not affect the lawfulness of the processing before such withdrawal, nor the processing of personal information done in reliance on certain grounds other than consent. If you have any issues with our compliance, you have the right to lodge a complaint with a European supervisory authority.

To exercise any of these rights, contact us at the address set forth in the section entitled “Contact Us” below and specify which right you intend to exercise. We will respond to your request within thirty (30) days from receipt. In addition, we may require additional information from you to allow us to confirm your identity. Please note that we store information, as necessary, to fulfil the purposes for which it was collected, and may continue to retain and use the information even after a data subject request for purposes of our legitimate interests, including, as necessary, to comply with our legal obligations, resolve disputes, prevent fraud and enforce our agreements.

Section XIII. Data Protection Officer

If you have questions or comments about this notice you may contact our Data Protection Officer by email at privacy@nexum.app.

Section XIV. Right to Non-Discrimination

We will not discriminate against you for exercising any of your rights under the applicable law or GDPR. Unless permitted by the law or GDPR, we will not:

- Deny you products or Services.
- Charge you different prices or rates for products or Services, including through the use of discounts or other benefits or imposing penalties.
- Provide you with a different level or quality of products or Services.
- Suggest that you will receive a different price or rate for products or Services or a different level or quality of products or Services.

Section XV. Your Rights with Respect to Your Personal Data; Data Protection Rights

- **Right to Request Deletion of Data.** You have the right to request deletion of your personal information. You can request the deletion of your personal information by contacting us at privacy@nexum.app with the subject line “Personal Information Deletion”. Only you, or an Authorized Agent may make a verifiable consumer request related to your personal information.
- **Right to be Informed.** In most cases, you have a right to know how and whether we collect your information. This includes the right to know, among other things, whether we collect and use your personal information, the categories of personal information we collect, the purposes for which such information is used, whether we sell your personal information to third parties, and the business or commercial purpose for collecting or selling personal information.
- **Data Protection Rights.**
 - The Right to Access: you may request that the Company provide you copies of your personal data;
 - The Right to Rectification: You have the right to request that the Company correct any information you believe is inaccurate,
 - The Right to Erasure: You have the right to request that our Company erase your personal data, under certain conditions.
 - The right to restrict processing: You have the right to object to the Company’s processing of your personal data under certain conditions.
 - The right to object to processing: You have the right to object to the Company’s processing of your personal data, under certain conditions.
 - The right to data portability: You have the right to request that the Company transfer data it has collected to another organization or directly to you, under certain conditions.
- **Request.** You may submit a request by sending an email to privacy@nexum.app.

Section XVI. Updates to this Privacy Policy

We may make changes to this Privacy Policy, and may apply any changes to information previously collected, as permitted by law. When we make changes to this Privacy Policy, we will notify you by posting the updated Privacy Policy on our Site, and we will update the effective date at the top of this Privacy Policy.

Section XVII. Terms of Use

This Privacy Policy is subject to the relevant terms of use of the relevant Nexum services, a copy of which is available at nexum.app. It is important that you read the terms of use, as where there is a conflict between this Privacy Policy and the terms of use, the terms of use shall prevail.

Section XVIII. Contact Us

If you have any questions regarding this Privacy Policy or our practices, please contact us at:

privacy@nexum.app