

## Privacy Policy

### Version 3

Last updated on 17 April 2024

Onramp.Money is operated by OMO LLC (3049 LLC 2023), a company registered under the provisions of the Limited Liability Companies Act, 2009, Chapter 151 of the Revised Law of Saint Vincent and the Grenadines, 2009 with its registered office at Euro House, Richmond Hill Road, Kingstown, Saint Vincent and the Grenadines PO 2897 (“**We**”, “**Us**”).

We take your privacy seriously. This Privacy Policy (“**Privacy Policy**”) describes the usage of information provided or disclosed to Us. The Privacy Policy is in accordance with applicable laws in the jurisdictions we offer our services. This Privacy Policy must be read in conjunction with the [Terms of Service](#), [User KYC AML](#) and policies.

All capitalised terms that have not been specifically defined herein shall have the same meaning as provided under the [Terms of Service](#).

By accessing, downloading, or using the OnRamp desktop-based website, mobile based application or widget integration (“**Application**”) you agree to be governed by this Privacy Policy. If you do not agree to any or all of the terms contained herein, please desist from using the Application.

### 1. Scope

- 1.1. This Privacy Policy applies to the services provided via the Application. This Privacy Policy applies if you have accessed, downloaded or used the Application from your laptop, personal computer, mobile telephone or handheld device or any other computer resource.
- 1.2. By accessing, downloading and using the Application, you acknowledge and agree that you have read and understood the terms of information collection, processing and disclosure. In addition, you acknowledge and agree that in order for Us to provide you with the Application and its associated services, we may disclose your information.

### 2. What Information Do We Collect?

- 2.1. **At the time of creation and registration of your Account:** We will seek the following information (“**Account Data**”) from you:

Name  
Gender  
Age  
Nationality  
Email address  
Mobile number  
Address (including country and ZIP/postal code)  
KYC document including Government issued identity proof  
Photograph (Live or Uploading)

Other details as Onramp is required to collect as per applicable laws.

- 2.2. **During your use of the Application:** We may automatically receive technical information about your computer/device. This includes your IP address, your computer operating system, time-zone, browser type, browser plug-in details, due to the communication protocol settings on the internet.
- 2.3. We may also collect information regarding the pages you viewed, the web addresses from which you click through to, time spent on certain pages, download errors and page response times. This information helps Us by improving our Product.
- 2.4. We may keep records of telephone calls, chats, conversations and information shared by you with Our customer service executives. We collect this information to ensure quality of the service rendered and use it to improve our product.
- 2.5. We may include other optional requests for information from you with a view to customize the Application. In particular, to deliver personalized information to you. The collection, use and disclosure of such additional personal information shall be done in accordance with the Privacy Policy.
- 2.6. We may also obtain your personal information from third party sources such as public databases, credit bureaus, ID verification partners, resellers and channel partners, joint marketing partners or social media platforms to comply with applicable laws and regulations.

### 3. Why Do We Collect Your Personal Information?

- 3.1. We collect, process and retain the above-described data attributes in order to deliver the Application and its allied services to you and to comply with applicable law. Information collected by Us shall be processed and disclosed only for the following purposes:
  - To register a User on the Platform;
  - To create a Wallet;
  - To facilitate transactions from Wallets including Application related services;
  - To comply with contractual obligations arising out of agreements signed with vendors that assist the operations, development and hosting of the Application;
  - To complete KYC related verification process, prevent fraud, fraudulent activities and comply with applicable laws including money laundering and anti-terror financing laws;
  - To carry out our obligations arising from your requests raised by you in relation to the services We provide on the Application;

- To comply with any filings, returns or statements required under applicable laws (including taxation laws);
- To comply with any information requests made by competent authorities as per provisions of applicable law;
- To improve the Application's functionality, and to customise your future experience with Us;
- To ensure that the transactions facilitated by the Application are smooth and seamless;
- To conduct research, statistical analysis and to gather information for business related activities including those for determining the number of visitors and transactional details. We may share the outcome of the research in an aggregated or non-personally identifiable form to third parties and affiliates;
- To communicate with you regarding the services offered by Us;
- To display details about your portfolio, transactions, trades and their features available on the Application through the mobile based application and website;
- To redress any grievances, complaints or queries raised by you;
- To ensure that the provisions of the Terms and Conditions and this Policy are complied by all Users.

3.2. We will seek your permission if We will collect, process and use your information for any other purpose.

#### **4. When Will We Disclose Your Personal Information?**

4.1. We may share your information with our trusted partners, third parties that assist in providing the Application to you. We may also share aggregated, non-personally identifiable information publicly and with our partners.

4.2. We may also use your information to perform analytics and conduct market research to analyse traffic patterns.

4.3. We may also disclose your personal information in any of the following cases, which includes and not limited to:

- As required by applicable law to comply with a judicial order, executive order, requirements by a law enforcement authority;
- If the desired features on the Application can be provided if your personal information is disclosed;
- If We believe in good faith that disclosures are necessary to comply with legal requirements, safety of others or investigate fraud or crime

- If We (or our affiliates) are involved in a merger, acquisition or sale of substantially all of its assets or equity. Such information shall be disaggregated to the extent possible and shall be subject to execution of appropriate non-disclosure agreements and binding privacy undertakings.

## 5. How Long Will Your Personal Information Be Stored With Us?

- 5.1. We store your Personal Information for a pre-determined period that is based on the following:
- Statutory and legal requirements;
  - Industry guidelines;
  - De-identified or pseudonymised data sets to be used in an aggregated format for scientific, statistical or historical purposes.
- 5.2. We retain your Personal Information for a period no longer than is necessary, and as may be required by law. If we need to retain your Personal Information for a longer period, we will inform you prior to the extension of the storage period and seek your explicit consent to extend the retention period. However, we may archive and/or retain some information for legal purposes. Any other information which is processed by us for analytical purposes, will only be processed in an aggregated or non-identifiable basis

## 6. How Do We Protect Your Information?

- 6.1. Your personal data is maintained by Us in electronic form. We shall take all necessary precautions to protect your personal data and implement reasonable security practices and measures including certain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of our business.
- 6.2. Specifically, We will ensure that the security infrastructure put in place by us to safeguard your Personal Information against loss, unauthorised access, destruction, use, processing, storage, modification or de-anonymisation, will at all times be adherent to the best industry standards.
- 6.3. We restrict access to personal information to Company employees, contractors, and agents who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations.
- 6.4. We prioritize the privacy and confidentiality of our user's personal information. Unless disclosure is compelled by law, any communication between you and Onramp.Money during the corporate onboarding process or while using our

platform is confidential. This includes but is not limited to: conversations via email, phone calls or video conferences and any documentation or information shared for the purpose of troubleshooting, support, or enhancement of your experience on Onramp.Money.

- 6.5. In the event that any information under our control is compromised as a result of a breach of security or any other unforeseen event, the Company will take all reasonable steps to resolve the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps according to applicable rules and regulations.

## **7. Links to Other Web Sites and Services**

We are not responsible for the practices employed by websites or services linked to or from the Application, nor the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link on our website, are subject to that third party's own rules and policies. Please read over those rules and policies before proceeding.

## **8. International Transfer**

- 8.1. Your information may be transferred to and stored in locations outside laws of the territory in which the Company is registered and where the Application is registered on the app stores. We will do this only when the destination jurisdiction has an adequate and appropriate level of protection and where the transfer is lawful, and only when the same is required for us to meet our contractual and statutory obligations, and only where the laws of your country allow us to do so. For completeness, the information which may be transferred outside is such information which may be sent to foreign jurisdictions as per the applicable laws.
- 8.2. When we transfer your personal data from your Home Country (country, state and city in which you are present) to the Alternate Country (another country, state and city), we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will also ensure that the recipient in Alternate Country is obliged to protect your personal data at a standard of protection comparable to the protection under applicable laws.
- 8.3. Our lawful basis for such transfer will be either based on content or one of the safeguards permissible by laws.

8.4. For transfer of data outside the EEA, we will follow adequate safeguards mandated under the GDPR. We ensure an adequate level of protection for the rights of data subjects based on the adequacy of the receiving country's data protection laws, contractual obligations placed on the recipient of the data (model contractual clauses).

## **9. Changes to this Policy**

We make periodic changes to the Privacy Policy. Any significant change will be promptly notified to you. The new terms will be posted on this page and you will be required to read and accept them to continue your use of the Services.

For any further information, concerns or clarifications, please do not hesitate to contact [compliance@onramp.money](mailto:compliance@onramp.money)