

PRIVACY POLICY

Please find here below the Privacy Policy of Sher Token Limited (hereinafter called “**Sher Token**”, “**we**”, or “**us**”), a company incorporated under the laws of Cayman Islands.

We understand that your privacy is important and we are strongly committed to protecting it and the Personal Data¹ or information that you may provide when you access and use content we own or operate on the websites located at [insert domain] , or any other websites, app, pages, features, or content we own or operate (hereafter: the “**Site(s)**”) and/or when you use our mobile application and related services (referred to collectively hereinafter as “**Services**”).

In addition, information that you may submit to *Sher Token* in response to an email request for information or other outreach from *Sher Token*, or through any *Sher Token* application processes, will also be treated in accordance with this Privacy Policy.

In this written Privacy Policy, *Sher Token* describes the use of your Personal Data by *Sher Token* and the scope and breadth of our commitment to privacy. We undertake to ensure that your Personal Data is handled responsibly and in compliance with the legal requirement of Cayman Islands’ Data Protection Law, 2017. Furthermore, we ensure compliance with the EU General Data Protection Regulation 2016/679.

1. Acceptance of Sher Token Privacy Policy

By exploring and using *Sher Token*’s Site and/or Services, and by submitting information to *Sher Token*, you signify acceptance to the terms of our Privacy Policy.

Where we require your consent to process your Personal Data, we will ask for your consent to the collection, use, and disclosure of your Personal Data as described further below.

Sher Token may provide additional disclosures or additional information about the data collection, use and sharing practices of specific Services, as and when necessary.

If you do not agree with any aspect of this Privacy Policy, you should immediately discontinue access or use of our Services.

2. Personal Data

Personal Data is data that can be used to identify you directly or indirectly, or to contact you. Our Privacy Policy covers all Personal Data that you voluntarily submit to us and that we obtain from our partners. This Privacy Policy does not apply to anonymized data, as it cannot be used to identify you. You may be asked to provide Personal Data anytime you are in contact with us in order for us to provide the Services.

Sher Token may also combine your Personal Data with other information to provide and improve our products, services, and content (please see the section below).

¹ In accordance with the Cayman Islands’ Data Protection Law and EU General Data Protection Regulation 2016/679 for the purposes of this Privacy Policy shall mean any information relating to an individual who can be identified, directly or indirectly, from that data as more elaborately dealt with in Section 2 of this policy.

Except as described in this Privacy Policy, *Sher Token* will not give, sell, rent or loan any Personal Data to any third party.

2.1. Personal Data We Collect

We collect personal data you provide directly to us or which you generate when you open an account with us, use our Services or our website(s) and platform(s).

When we require certain personal data from users it is because we are required by law to collect this data (anti-fraud / anti-money laundering / counter financing of terrorism / know your customer obligations) or it is relevant for specified purposes. Any information you provide to us that is not required is voluntary.

You are free to choose whether to provide us with the types of Personal Data requested, but we may not be able to serve you as effectively or offer you all of our Services when you do choose not to share certain information with us. However, we shall strive to provide you with the best possible Services always.

We also collect Personal Data when you use or request information about our Services, subscribe to marketing communications, request support, complete surveys, or sign up for one of our events.

We may also collect Personal Data from you offline, such as when you attend one of our events, or when you contact customer support.

We may use this information in combination with other information we collect about you as set forth in this Privacy Policy.

2.2 Data Collection When Registering / Using Our Services

When registering on our Site(s), you may be asked to enter:

- **Personal Identification Information:** Full name, date of birth, age, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.
- **Account Identification Information:** Username, password and account settings and preferences.
- **Formal Identification Information:** Tax ID number, passport number, driver's license details, national identity card details, photograph identification cards, and/or resident permit (visa) information.
- **Financial Information:** Bank account information, payment card primary account number (PAN), transaction history, trading data, and/or tax identification.
- **Transaction Information:** Information about the transactions you make on our Services, such as the name of the recipient, your name, the amount, and/or timestamp.

We may also collect Personal Data from third party partners and public sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification

partners, resellers and channel partners, joint marketing partners, and social media platforms which include:

- Financial information
- Reputational information
- Corporate/business activities for corporate customers

We use public databases and ID verification partners to verify your identity. Indeed, ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job position, public employment profile, credit history, status on any sanctions lists maintained by public authorities, and other relevant data. We obtain such information to comply with our legal obligations, such as anti-money laundering laws.

In some cases, we may process additional data about you to ensure our Services are not used fraudulently or for other illicit activities. In such instances, processing is necessary for us to continue to perform our contract with you and others.

2.3 Data Collection When Visiting Our Website

When visiting our website, we store every instance of access in a log file and therefore, the following Data are stored in this process:

- Computer or mobile device information;
- Website from which our domain is accessed and website usage information;
- Operating system of your computer;
- Country from which our website is accessed;
- Name of your internet provider;
- Name and URL of the Data accessed;
- Date and time of access;
- IP address of the accessing computer.

These Data are generally anonymized with no personal reference and only used to establish connection with the website, to ensure ongoing system security and stability and for statistical purposes. These Data are not associated or stored with Personal Data.

IP address of the accessing computers will be analyzed only in the event of an attack on the network infrastructure or in case of suspicion of otherwise unauthorized or improper use of the website and for the sole purposes of defence or use as part of criminal proceedings for identification purposes and for criminal and/or civil proceedings against the user involved. IP address is also used to filter out geographical zones from accessing our Services.

3. HOW YOUR PERSONAL DATA IS USED

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. In general, we use personal information to create, develop, operate, deliver, and improve our Services, content and advertising, and for loss prevention and anti-fraud purposes. We may use this information in the following ways:

3.1. To Maintain Legal and Regulatory Compliance

Some of our Services are subject to laws and regulations requiring us to collect and use your personal identification information, formal identification information, financial information, transaction information, employment information, online identifiers, and/or usage data in certain ways.

We must identify and verify customers using our Services in order to comply with anti-money laundering and terrorist financing laws across jurisdictions specifically as may be more specifically required by Cayman Islands' Anti-Money Laundering Regulations. In addition, we use third parties to verify your identity by comparing the personal information you provided against third-party databases and public records.

We may require you to provide additional information which we may use in collaboration with service providers acting on our behalf to verify your identity or address, and/or to manage risk as required under applicable law. If you do not want to have your personal information processed for such purposes, then we shall terminate your account as we cannot perform the Services in accordance with legal and regulatory requirements.

3.2. To Enforce Our Terms in Our User Agreement and Other Agreements

We handle sensitive information, such as your identification and financial data, so it is very important for us and our customers that we are actively monitoring, investigating, preventing and mitigating any potentially prohibited or illegal activities, enforcing our agreements with third parties, and/or violations of our posted user agreement or agreement for other Services. In addition, we may need to collect fees based on your use of our Services. We collect information about your account usage and closely monitor your interactions with our Services. We may use any of your personal information collected on our Services for these purposes. The consequences of not processing your personal information for such purposes is the termination of your account as we cannot perform our Services in accordance with our terms.

3.3. To Provide *Sher Token* Services

We process your personal information in order to provide the Services to you.

We cannot provide you with Services without such information.

3.4. To Provide Service Communications

We send administrative or account-related information to you to keep you updated about our Services, inform you of relevant security issues or updates, or provide other transaction-related information. Without such communications, you may not be aware of

important developments relating to your account that may affect how you can use our Services. [You may inform us about the same in the event you do not wish to avail such services.]

3.5. To Provide Customer Service

We process your personal information when you contact us to resolve any question, dispute, collected fees, or to troubleshoot problems. We may process your information in response to another customer's request, as relevant. Without processing your personal information for such purposes, we cannot respond to your requests and ensure your uninterrupted use of the Services. [You may inform us about the same in the event you do not wish to avail such services.]

3.6. To Ensure Quality Control

We process your personal information for quality control and staff training to make sure we continue to provide you with accurate information. If we do not process personal information for quality control purposes, you may experience issues on the Services such as inaccurate transaction records or other interruptions. Our basis for such processing is based on the necessity of performing our contractual obligations with you. [You may inform us about the same in the event you do not wish to avail such services.]

3.7. To Ensure Network and Information Security

We process your personal information in order to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations. The threat landscape on the internet is constantly evolving, which makes it more important than ever that we have accurate and up-to-date information about your use of our Services. Without processing your personal information, we may not be able to ensure the security of our Services.

3.8. For Research and Development Purposes

We process your personal information to better understand the way you use and interact with our Services. In addition, we use such information to customize, measure, and improve the Services and the content and layout of our website and applications, and to develop new services. Without such processing, we cannot ensure your continued enjoyment of our Services. Our basis for such processing is based on legitimate interest. [You may inform us about the same in the event you do not wish to avail such services.]

3.9. To Enhance Your Website Experience

We process your personal information to provide a personalized experience and implement the preferences you request. For example, you may choose to provide us with access to certain personal information stored by third parties. Without such processing, we may not be able to ensure your continued enjoyment of part or all of our Services. [You may inform us about the same in the event you do not wish to avail such services.]

3.10. To Facilitate Corporate Acquisitions, Mergers, or Transactions

We may process any information regarding your account and use of our Services as is necessary in the context of corporate acquisitions, mergers, or other corporate transactions. You have the option of closing your account if you do not wish to have your personal information processed for such purposes.

EEA residents: pursuant to EEA Data Protection Law, we process this personal information to satisfy our legitimate interests as described above.

3.11. **To Engage in Marketing Activities**

Based on your communication preferences, we may send you marketing communications to inform you about our events or our partner events; to deliver targeted marketing; and to provide you with promotional offers based on your communication preferences. We use information about your usage of our Services and your contact information to provide marketing communications. You can opt-out of our marketing communications at any time.

If you are a current customer residing in the EEA, we will only contact you by electronic means (email or SMS) with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you.

If you are a new customer and located in the EEA, we will contact you if you are located in the EU by electronic means for marketing purposes only if you have consented to such communication. If you do not want us to use your personal information in this way, or to pass your personal information on to third parties for marketing purposes, please follow the opt-out links included in marketing communications or contact us at info@shercoin.io. You may raise such objection with regard to initial or further processing for purposes of direct marketing, at any time and free of charge. Direct marketing includes any communications to you that are only based on advertising or promoting products and services.

We will not use your personal information for purposes other than those purposes we have disclosed to you, without your permission. From time to time we may request your permission to allow us to share your personal information with **third parties**. You may **opt out** of having your personal information shared with third parties or allowing us to use your personal information for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your authorization. If you choose to so limit the use of your personal information, certain features or our Services may not be available to you. However, we shall strive to provide you with the best possible Services always.

4. **Cookies – Collection & Use of Data Collected Automatically**

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your web browser (if you have permitted) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Cookies are stored on the hard drive of your computer and do not necessarily transmit your Personal Data to *Sher Token*.

Cookies are used to help *Sher Token* understand your preferences based on previous or current site activity, which enables *Sher Token* to provide you with improved services.

Cookies are also used for security purposes and to compile aggregate Data about site traffic and site interaction so that better site experiences and tools can be offered in the future.

Sher Token may also use trusted third-party service providers that track this information on *Sher Token*'s behalf. Our service provider(s) will place cookies on the hard drive of your computer and will receive data that we select to educate us notably on:

- a. How visitors navigate around our Site
- b. What products are browsed
- c. General transaction information

Our service provider(s) analyses this data and provide(s) us with aggregate reports. The data and analysis provided by our service provider(s) will be used to assist us in better understanding our visitors' interests in our Site and how to better serve those interests. The data collected by our service provider(s) may be linked to and combined with data that we collect about you while you are using the Platform. Our service provider(s) is/are contractually restricted from using information they receive from our Site other than to assist us.

You can choose to have your computer warn you (through your browser settings) each time a cookie is being sent, or you can choose to turn off all cookies. If you choose to turn cookies off, some of the features that make your site experience more efficient may not function properly.

Specifically for analytics providers, we use Google Analytics, which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our website. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having your activity on the website made available to Google Analytics by installing the Google Analytics opt-out browser add-on (<https://tools.google.com/dlpage/gaoptout>) for your web browser. The Google Analytics opt-out browser add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

5. Disclosing and Transferring Personal Data

We may disclose your Personal Data to third parties and legal and regulatory authorities, and transfer your Personal Data, as described below.

There are certain circumstances where we may transfer your personal data to employees, contractors and to other parties.

We may share information about you with other members of our group of companies, so we can provide the best service across our group. They are bound to keep your information in accordance with this Privacy Policy;

We may also share your information with certain contractors or service providers. They may process your personal data for us, for example, if we use a marketing agency. Other recipients/service providers include advertising agencies, IT specialists, database providers, backup and disaster recovery specialists, email providers or outsourced call centers. Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function;

We may also share your information with certain other third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

Your personal data may be transferred to other third-party organizations in certain scenarios:

- If we're discussing selling or transferring part or all of our business – the information may be transferred to prospective purchasers under suitable terms as to confidentiality;
- If we are reorganized or sold, information may be transferred to a buyer who can continue to provide services to you;
- If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide *Sher Token* Services or as required by law.

If a service provider is located in a country that does not apply the standard of data protection of Swiss law and EU General Data Protection Regulation, *Sher Token* will use a contract to ensure that your Personal Data has the same level of protection as if protected in accordance with Swiss Federal Act on Data Protection and its Ordinance and EU General Data Protection Regulation.

5.1 How Personal Information is Shared With Third Party Sites and Services

Please note that merchants you interact with may have their own privacy policies. Hence *Sher Token* is not responsible for their operations, including, but not limited to, their information practices.

Information collected by third parties, which may include such things as contact details or location data, is governed by their privacy practices. We encourage you to learn about the privacy policies of those third parties.

If you authorize one or more third-party applications to access your *Sher Token* Account, then information you have provided to *Sher Token* may be shared with those third parties. Unless you provide further authorization, these third parties are not allowed to use this information for any purpose other than to facilitate your transactions using *Sher Token* Services.

6. Transfer of Data

We store and process your Personal Data in data centers around the world, wherever we have our premises or service providers are located.

As such, we may transfer your Personal Data outside of Cayman Islands or the European Union. Some of the countries to which your personal data may be transferred do not benefit from an appropriate protection regulation.

These specific countries can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.

For such international countries, we shall have specific data-protection clauses in our agreements and arrangements with them.

7. Security of Data

We store all your Personal Data on a server operated by Amazon Web Services (AWS).

We take all reasonable effort on technical and organizational security measures to protect your Data from being manipulated, lost or accessed by unauthorized third-parties.

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our Site as safe as possible.

Your Personal Data is contained behind secured networks and is only accessible by a limited number of individuals who have special access rights to such systems and are required to keep the information confidential.

Although no method of transmission over the Internet, or method of electronic storage is one hundred percent secure, we strive to continually update and improve our security measures with the most recent technological developments.

We would like to draw your attention on the fact that we normally never ask for financial or payment information, such as your credit card number, passcode, account number or pin number, in an e-mail, text or any other communication that we send to you. Please always check that any website on which you are asked for financial or payment information in relation to our reservations

or services is operated by *Sher Token*. The risk of impersonating hackers exists and should be taken into account when using our website and/or Services.

If you do receive a suspicious request, do not provide your information and report it by contacting one of our member service representatives as set in this Privacy Policy.

Since we cannot 100% guarantee that loss, misuse, unauthorized acquisition, or alteration of your data will not occur, please accept that you play a vital role in protecting your own Personal Data. When registering with us, it is important to choose an appropriate password of sufficient length and complexity, to not reveal this password to any third-parties, and to immediately notify us if you become aware of any unauthorized access to or use of your account.

Furthermore, we cannot ensure or warrant the security or confidentiality of information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us at the email address, mailing address or telephone number listed at the end of this Privacy Policy.

8. Retention of Data

8.1. Personal Data

Sher Token will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy.

Sher Token will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your Data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Therefore, and in accordance with our record keeping obligations, we will retain Account and other Personal Data for at least five years (and some up to ten years, as required by applicable law) after an Account is closed.

8.2. Data Collected Automatically

Sher Token will also retain Data Collected Automatically either generated by the use of the website or from the website infrastructure itself (for example, the duration of a page visit)) for internal analysis purposes.

This Data is generally retained for a shorter period of time, except when this Data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this Data for longer time periods.

Hence, this kind of Data collected via technical means such as cookies, webpage counters and other analytics tools is normally kept for a period of up to one year from expiry of the cookie.

9. Disclosures Due to Legal Compliance

Sher Token complies with all applicable privacy laws and regulations.

Sher Token may be compelled to surrender personal user or customer information to legal authorities without express user consent if presented with a court order or similar legal or administrative order, or as required or permitted by the laws, rules, and regulations of any nation, state, or other applicable jurisdiction.

Also, in the event of a violation of the Terms & Conditions of use of the Site or a violation of any restrictions on use of materials provided in or through the Site, we may disclose personal user information to our affected business partners or legal authorities.

10. Your Rights

10.1. General

Sher Token is the Data Controller with respect to your Personal Data. We determine the means and purposes of processing you Data.

We may process your Personal Data if you consent to the processing, to satisfy our legal obligations, if it is necessary to carry out our obligations arising from any contracts we entered with you, or to take steps at your request prior to entering into a contract with you, or for our legitimate interests to protect our property, rights or safety of *Sher Token*, our customers or others.

Whenever made possible, you can update your Personal Data directly within your account settings section. If you are unable to change your Personal Data, please contact us to make the required changes.

Should you have any question or wish you exercise your Rights, please contact our Data Protection Officer by writing an email at info@shercoin.io so that we may consider your request under applicable law.

We reserve our right to verify your identity before responding to such requests.

Please note that according to Swiss law, specific Data must be stored for a determined period of time. Such Data must be therefore remained with *Sher Token* until the legal period has expired. These specific Data are blocked in our system and used only in order to meet legal requirements.

10.2. Individual Rights in Relation With Your Data

10.2.1. Right to Access Your Personal Data

You are entitled to ask *Sher Token* if we are processing your Data. In case the answer is positive, you can request that we provide you a copy of your Personal Data we hold. We may require you to specify the information or processing activities to which your request relates.

This information will be provided without undue delay.

Your right to access shall only be limited where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated.

10.2.2. Right to Correct Your Personal Data

You are entitled to request that any incomplete or inaccurate Personal Data we hold about you is corrected or updated.

Your right to access and correction shall only be limited where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated.

10.2.3. Right to Withdraw Your Consent

You have the right to withdraw your consent to the processing of your Personal Data collected on the basis of your consent at any time. Your withdrawal will not affect the lawfulness of previous processing based on your consent before the withdrawal.

10.2.4. Right to Erasure of Your Personal Data

You are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with claims.

10.2.5. Right to Data Portability

If we process your Personal Data based on a contract with you or based on your consent, or the processing is carried out by automated means, you may request to receive your Personal Data in a structured, commonly used and machine-readable format, and to have us transfer your Personal Data directly to another “controller” (natural or legal person that determines the purposes and means of the processing of your Personal Data), where technically feasible, unless exercise of this right adversely affects the rights and freedoms of others.

10.2.6. Right to Restriction of Processing

You have the right to restrict or object to us processing your Personal Data where one of the following applies:

- a. You contest the accuracy of your Personal Data that we processed. In such instances, we will restrict processing during the period necessary for us to verify the accuracy of your Personal Data.
- b. The processing is unlawful, and you oppose the erasure of your Personal Data and request the restriction of its use instead.
- c. We no longer need your Personal Data for the purposes of the processing, but it is required by you to establish, exercise or defense of legal claims.

10.2.7. Right to Objection of Processing

Where we are processing your personal data based on consent or legitimate interests (or those of a third party) you may object at any time to the processing of your Personal Data. However, we may be entitled to continue processing your Personal Information based on our legitimate interests or where this is relevant to the defense of legal claims.

You also have the right to object where we are processing your personal data for direct marketing purposes.

10.2.8. Automated Decisions

You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.

10.3 Complaint

If you believe that we have infringed your rights, we encourage you to contact us first at info@shercoin.io so that we can try to resolve the issue informally.

You also have a right to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where you are habitually resident, where we are based, or where an alleged infringement of Data Protection law has taken place.

11. Children's Personal Data

We do not knowingly request to collect Personal Data from any person under the age of 18.

If a user submitting Personal Data is suspected of being younger than 18 years of age, *Sher Token* will require the user to close his or her account.

We will also take all necessary steps to delete his or her Data as soon as possible.

12. Links to Other Websites

Sher Token's website may contain links to other sites that are not operated by *Sher Token*. If you click on a third-party link, you will be directed to that third party's site.

Sher Token strongly advises you to review the privacy policy of every site you visit.

Sher Token has no control over and assumes no responsibility for the content, privacy policies or practices of any third-party sites or services.

13. Changes to this Privacy Policy

Sher Token may update the Privacy Policy from time to time. You shall be notified by or by any means of a notice on our Services prior to the change becoming effective.

The changes of the Privacy Policy shall also be posted on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

14. Contact Us

If you have questions or concerns regarding this Privacy Policy, or if you have a complaint, you should first contact us at:

info@shercoin.io