



# PRIVACY POLICY

We, the OneCode Labs LLC team (hereinafter “OneCode Labs”), value your privacy. That is why we made every effort to create a service that adheres to user privacy standards we are comfortable with.

## Preamble

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When you use our applications (the “App”) and/or its services, you explicitly consent to the collection, use, and disclosure of your information as described in this Privacy Policy, as well as to Cookies being stored and set and information being accessed on your device.

We know that you care how information about you is used and shared.

This Privacy Policy explains what information of yours will be collected by us and stored on our servers when you use the App and how the information will be used.

## **WE WILL NOT USE OR SHARE YOUR INFORMATION WITH ANYONE EXCEPT AS DESCRIBED IN THIS PRIVACY POLICY.**

This Privacy Policy may be updated from time to time; therefore, we ask you to periodically review the most updated form of the Privacy Policy as indicated below. Your continued use of this App after this Privacy Policy has been amended shall be deemed as your continued acceptance of the terms of this Privacy Policy, as amended.

## Information Collected

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### Personal Information

We may collect and store any information you explicitly provide or enable us to access, whether via the App, software made available for your use in connection with the App, third-party login services and accounts, or direct communication (for example, in the process of registration to the App’s services, filling forms, or submitting inquiries). This includes, for example, information that identifies or relates to you personally, such as your:

- Name;
- Email address;
- Data provided for KYC (Know Your Customer) verification;
- Transaction data related to your use of wallets or crypto cards.

### Non-Personal Information

We collect and aggregate non-identifying information regarding your use of our App, including:

- Type of device through which the App is accessed;

- Pages browsed, features used, and services utilized;
- Your IP address, browser type and settings, and geolocation;
- Cookies data and content as detailed below.

Note that Non-Personal Information may be aggregated separately for each specific IP. IP addresses are anonymized and contain no information regarding the identity of the ultimate person using the device.

## **Use of Collected Information**

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### **Personal Information**

Personal Information shall be used solely to process your inquiries, respond to your requests, and improve our services.

We may share some or all of your Personal Information with our subsidiaries, joint ventures, or other companies under a common control that we have or may have in the future, provided such parties undertake to protect your privacy under these terms.

Personal Information you provide during onboarding and KYC processes may be shared and disclosed to our partners, regulators, or KYC providers, as required by law.

Otherwise, we will not disclose your Personal Information to any third party, unless required to do so as part of any legal proceedings or by court order.

### **Non-Personal Information**

Non-Personal Information shall be used to:

- Ensure the adequate operation and improvement of the App;
- Analyze and enhance user experience;
- Develop and adjust App features.

We reserve the right to use and disclose Non-Personal Information to third parties, including business partners, affiliates, and consultants, at our sole discretion.

## **Cookies**

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### **What Are Cookies?**

Cookies are small data files downloaded and stored on a user's device while using an app, often used to keep a record of actions or track related activity.

### **Disabling Cookies**

Modern devices and browsers enable you to disable Cookies. Please consult the Help file of your browser or device settings. Disabling Cookies may interfere with your use of the App.

### **Our Use of Cookies**

We use Cookies to:

- Maintain session activity and user preferences;
- Track user interactions and behavior;
- Enhance security and App functionality.

We may use third-party content services (e.g., Google Analytics) to analyze App usage. Note that such third-party Cookies are governed by their respective privacy policies.

## **Information Security**

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Although we take reasonable measures to secure the information and reduce the risk of unwanted disclosure, we cannot guarantee the information will not be exposed as a result of unauthorized access.

## **Your Rights**

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You may request to:

- Access and update your personal data;
- Delete your account (subject to legal requirements for data retention);
- Opt out of receiving marketing communications.

As a regulated AML entity, we are required to retain personal information for 5 years after the termination of a business relationship.

## **Updates to the Privacy Policy**

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This Privacy Policy may be revised periodically. Updates will be posted in the App and will take effect immediately upon publication. Continued use of the App constitutes acceptance of the updated policy.

## **Contact Us**

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If you have any questions regarding this Privacy Policy, you can contact us:

- Email: [support@onecode.ge](mailto:support@onecode.ge)