



## PRIVACY POLICY

The security of your Personal Information is important to us. We are committed to protecting the privacy, confidentiality and security of your Personal Information. Please read this Privacy Policy carefully as it includes important information regarding your Personal Information.

MERJ Exchange Limited (“**MERJ**” or “the Company”) owns and operates <http://www.merj.exchange> (“our Website”, “the Website” or “this Website”).

This Privacy Policy applies only to personal identifiable information collected on or through our Website by MERJ and various of its affiliates, including MERJ Clearing and Settlement Limited and MERJ Depository and Registry Limited (“we”, or “us”, or “our”). When we refer to “our Website”, “the Website” or “this Website” in this Privacy Policy we mean the specific webpages of [www.merj.exchange](http://www.merj.exchange) that link to this Privacy Policy.

In this Privacy Policy, we may refer to personally identifiable information about you as your “Personal Information”. We may also sometimes collectively refer to handling, collecting, protecting and storing your Personal Information as “processing” such personal information.

If you have any questions or concerns, please do not hesitate to contact us at the details provided below under the heading “Contact Us”.

This Privacy Policy sets forth our Policy with respect to how we will collect, handle, store, share and protect your Personal Information when you:

- (a) Engage with us in relation to becoming an ATS Participant of MERJ by completing and submitting the online application form on our Website labelled as “MERJ ATS Participant Agreement”;
- (b) Engage with us in relation to becoming a Service Provider for MERJ by completing and submitting the online application form on our Website labelled under “Service Provider Agreement”;
- (c) Visit and use our Website; and
- (d) Otherwise contact us, whether as part of media or investor communications or as part of our stakeholder outreach activities or otherwise.

We will refer to the activities mentioned in items (a) to (b) above collectively as the “Activities”.

You do not have to give us your Personal Information in order to visit our Website.

We typically collect or obtain your Personal Information because you give it to us (for example when you engage with us in relation to the Activities) or because it is disclosed on publicly available sources.



We use your Personal Information only for processing your application in relation to Activities you would like to engage in with us or for providing and improving our Website. By using our Website for the purposes of the Activities mentioned above, you agree to the collection and use of your Personal Information in accordance with this Privacy Policy.

This Privacy Policy is also incorporated into the MERJ ATS Participant Agreement and the Service Provider Agreement which governs your relationship with us.

### **Personal Information**

Your Personal Information that we collect or obtain typically includes any of the following –

- a) Your name, date of birth, gender, picture, identification documents, birth certificate, ethnicity, language, physical or mental health;
- b) E-mail address (including your business and/or personal addresses); home address; telephone number; other contact details; country of residence;
- c) Family circumstances (for example, your marital status when you enter it in a form on our Website, or it appears in any documentation you provide to us such as your marriage certificate);
- d) Education details, criminal and employment history;
- e) Financial and tax-related information (for example, your income, bank account and tax residency where such information appears in any documentation you provide to us);
- f) Blockchain identifiers, such as blockchain addresses and public keys;
- g) Usernames and passwords that you create when registering for an account with us;
- h) Correspondence sent by you or records of our communications with you;
- i) Postings on any blogs, forums, wikis and any other social media applications and services that we provide; and
- j) Details of how you like to use our Website, details of how you like to interact with us and other similar information.

### **Non-Personal Information**

When you interact with the Website, we automatically collect certain personally non-identifiable information (“Non-Personal Information”). The Non-Personal Information we collect includes without limitation, your Internet Protocol (“IP”) address, domain name of your internet service provider, your approximate geographic location, a record of the site pages that you visit, the time of your visits and aggregated Personal Information that cannot be used to specifically identify you. Such information, which is collected passively using various technologies is strictly for statistical purposes and to determine the visitor traffic patterns through the Website and cannot, in and of itself, be used to specifically identify you.

### **Cookies**



We also usually collect or obtain information from you because we observe or infer that information about you from the way you interact with us and others. For example, in operating the Website, we use a technology called “Cookies”. Cookies are small text files that provide Non-Personal Information to us regarding the visitors to our Website. Our Cookies provide additional functionality to the Website and assists in personalizing your online experience. It further helps us analyze the Website usage more accurately and allows us to gauge the areas that are of the most interest to our visitors. None of our cookies contain any of your personally identifiable information.

Because you are using our Website, we assume that you are happy for us to use cookies in this way. If you are not happy, then you should either not use the Website or set your web browser to not accept cookies from us or use your web browser’s anonymous browsing setting (this is called ‘Incognito’ in Google Chrome, ‘InPrivate’ in Internet Explorer and ‘Private Browsing’ in Firefox).

### **Aggregated Personal Information**

In an on-going effort to better understand and serve the users of the Website, we often conduct researches on our customer demographics, interests and behavior based on Personal Information and other information that we collect. This research may be compiled and analyzed on an aggregate basis and this aggregate information is strictly for statistical purposes and does not identify you personally and therefore is considered and treated as Non-Personal Information under this Privacy Policy.

### **Main Purposes for which we use your Personal Information**

We will use your Personal Information in connection with the Activities. In particular, we will use your Personal Information to:

- a) verify your identity (including age and residency) when you are dealing with us;
- b) determine your eligibility for any of our services;
- c) correspond and manage our relationship with you;
- d) improve our website based on your information and feedback;
- e) monitor the use of our products and services;
- f) carry out education;
- g) manage and resolve any complaints or issues;
- h) provide you with information about our services; and
- i) tailor content of our Website to provide you with a more personalized experience and draw your attention to information about products and services that may be of interest to you.

We are not in the business of selling or supplying your Personal Information to any third parties. We consider this information to be required to enable us to provide the services you may require.



### **Use of Personal Information for other activities that form part of the operation of our business**

We generally use your Personal Information for the purposes of, or in connection with, other activities that form part of the operation of our business. In general, these are:

- a) satisfaction of applicable legal or regulatory requirements;
- b) responding to requests from, and other communications with, competent public or juridical authorities;
- c) invoicing purposes as may be applicable;
- d) business development purposes; and
- e) prudent IT management.

### **USE OF PERSONAL INFORMATION IN OTHER CASES**

#### **Business Transfers**

In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Information may be part of the transferred assets. We may also share your Personal Information with our subsidiaries and/or affiliates for purposes consistent with this Privacy Policy and legislation regulating the use of personal information. Our subsidiaries and affiliates will be bound to maintain that Personal Information in accordance with this Privacy Policy.

#### **Legal Requirements**

We may disclose your Personal Information if required to do so by law or in the good faith belief that such action is necessary (i) to comply with a legal obligation, (ii) to protect and defend our rights or property, or (iii) to protect us against legal liability.

#### **Non-Personal Information**

As Non-Personal Information cannot be used to personally identify you, we may disclose, transfer or share Non-Personal Information for any lawful purpose.

#### **How we protect the information we collect**

We have put in place certain measures to ensure the security of the Personal Information we collect and to secure the correct use thereof. These measures are appropriate to the nature of the information provided to us and prevent unauthorized access. We take reasonable steps to ensure the reliability of our own staff and ensure that any person who processes information on our behalf achieves the same high standards that we set ourselves and limit their access to your



Personal Information to what is necessary for them to perform their responsibilities. Our security measures include the use of software firewalls and encryption systems. We generally store your Personal Information that we collect in electronic databases, some of which may be held on our behalf by third party data storage providers. At times, we may also keep hard copy of any records of your Personal Information in physical storage facilities. We use a range of security processes to protect the confidentiality and security of any Personal Information that we hold. We will ask for your express permission before we use your Personal Information for any purpose not disclosed above.

We take what we believe to be reasonable steps to protect the Personal Information provided via the Website from loss, misuse, unauthorized access, inadvertent disclosure, alteration, and destruction. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Website and any such transmission is at your own risk.

If you are a MERJ ATS Participant, the security of your personal data also relies on your protection of your personal data and particularly any identity information and your secure access credentials such as passwords you use to access the ATS. You must not share your secure access credentials with anyone. If you lose your secure access credentials or share them with a third party for any reason, the third party may have access to your account and your Personal Information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your secure access credentials, please change them immediately and also contact us at [compliance@merj.exchange.com](mailto:compliance@merj.exchange.com) immediately.

#### **Request for access for Personal Information**

If you want to access any of the Personal Information that we hold about you or to correct any aspect of it (because you think it is incomplete or might be incorrect), you may, after having provided adequate proof to confirm your personal identity, contact our compliance team on: [compliance@merj.exchange.com](mailto:compliance@merj.exchange.com)

There may be cases where we may be unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot complete your request.

There may be cases where, if we are satisfied that your Personal Information is inaccurate, incomplete or out-of-date, irrelevant or misleading we may take reasonable steps to correct your Personal Information, even if you do not request us to correct it.



## Your consent

By using our Website, you agree that you consent to this Privacy Policy, as may be updated from time to time.

## Applicable Legislations

Use of our Website and any activities concluded with us are governed by the laws of the Republic of Seychelles. This Privacy Policy is written in line with international best practices. At the time of writing this Privacy Policy, the Republic of Seychelles does not have any legislations concerning the protection of data in force and in the event that a piece of legislation is introduced, this Privacy Policy may be amended to include any provisions that may be required in such legislations.

## Changes to this privacy policy

The Website and/or any other information displayed on the Website may change from time to time. As a result, at times it may be necessary for us to make changes to the Website and this Privacy Policy.

We reserve the right to update or modify our Website and this Privacy Policy at any time and without prior notice to you. We will request your consent should any update or modification of the Website or Privacy Policy adversely affect your rights set out herein.

Please review this Privacy Policy periodically and especially before you provide any Personal Information to us. Your continued use of the Website, after any changes or revisions thereto or to this Privacy Policy, shall indicate your agreement with the terms of such revised Privacy Policy.

## Hyperlinks

Our Website may contain links to and from the websites of our advertisers and/or affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please familiarize yourself with these policies before you submit any Personal Information to these websites.

## Contact us

Please feel free to contact us if you have any queries regarding our Privacy Policy. We confirm our contact details are as follows:

Physical address: F28 Eden Plaza, Eden Island, PO Box 360, Republic of Seychelles;



Telephone: on +248 434 68 00 during 0830 to 1700 on Monday to Friday;  
E-mail: at [info@merj.exchange.com](mailto:info@merj.exchange.com)