



GLOBIANCE USA INC.

(Trading as *Globiance*)

Registration Number: 2021-001049603

Privacy Policy

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DOCUMENT GOVERNANCE	
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PRIVACY POLICY

1. **Overview**

- 1.1 At Globiance USA Inc., we value Your trust and respect Your privacy.
- 1.2 This Privacy Policy provides You (hereinafter referred to as the “*User(s)*” and/or “*You*” respectively) with details about the manner in which Your data is collected, stored, and used by **Globiance USA Inc.** holding registration number **2021-001049603** and registered at *Law Offices of Robert V. Cornish, Jr., PC 680 South Cache St Ste 100, Jackson, Wyoming, WY 83001* (hereinafter referred to as “**Globiance**”, “**We**”, and/or “**Us**” respectively).
- 1.3 User(s) are advised to read this Privacy Policy carefully and ensure the appropriate understanding thereof.
- 1.4 By visiting Globiance Sites, User(s) expressly consent to use and disclose the required personal information in accordance with this Privacy Policy.
- 1.5 If User(s) do not agree to the terms of the Policy, access and usage of the Globiance Services is prohibited and unauthorised. Globiance may, at its own discretion and without notification to User(s), amend and/or update this Privacy Policy from time-to-time.
- 1.6 To ensure User(s) adequate knowledge of any amendments and/or updates, kindly review the Privacy Policy periodically.
- 1.7 Date of last update can be viewed at the end of the Policy.

2. **Collecting Personal Information**

- 2.1 Should User(s) wish to transaction and/or make use of the Globiance Services and/or Site, appropriate requested information will be collected by Globiance and/or its representatives from said User(s).
- 2.2 This information includes information of a personal nature.
- 2.3 Personal information requested by Globiance includes, but is not limited to, the following: full name of User(s), address for service, unique government-issued identification information, and banking information.
- 2.4 The above-listed information is necessary for the following purposes:
 - i. To establish and maintain a responsible commercial relationship with User(s);
 - ii. To understand User(s)’ needs and eligibility for products and services;
 - iii. To inform User(s) about trading and financing features;
 - iv. To provide information to User(s) about developments and new products, including amends and enhancements to the Globiance Site;
 - v. To develop, enhance, and market provided products and services, as well as the provision of said products and/or services;
 - vi. To process billing and/or collection of any fees;
 - vii. To conduct surveys and obtain feedback from User(s);
 - viii. To deliver products and services to User(s);
 - ix. Provide User(s) with news and other matters of general interest to User(s); and
 - x. To meet Globiance’s legal and regulatory requirements.

3. Consent

By using the Globiance Site and/or by providing Your information, User(s) consent to the collection and use of the information disclosed in accordance with this Privacy Policy, including but not limited to, User(s) consent for sharing information as per this Privacy Policy.

4. Registration of a Globiance Account

4.1 In order to use any of the Globiance Services, User(s) must first register by providing their full name, an e-mail address, unique password, and affirming acceptance and acknowledgement of these Terms.

4.2 Globiance may, at Our sole discretion, refuse access and/or establishment of a Globiance Account and/or limit the number of Globiance Accounts that a single User may establish and/or maintain at any time.

5. Personal Information Collected by Globiance

5.1 Personal information collected by Globiance can and may be used to assist the appropriate authorities in the fight against the funding of terrorism and money laundering activities.

5.2 What this means for User(s): When You open an Account, Globiance requests your name, address, date of birth, and other identifying personal information; this provided information may be used where necessary and obligated to assist the authorities responsible for the prevention and/or investigation of money laundering, funding of terrorism and related financial crimes and activities.

5.3 In addition, Globiance is a global company and thus may conduct business and collect personal information from individuals and/or institutions located within the United States of America.

5.4 We are required to protect personal information processed in the United States in accordance with the appropriate data protection legislation and regulations.

6. Personal Information Collected May Include the Following:

6.1 Individual Customer – Globiance attempts to collect, verify, and authenticate the following information:

- i. Email address;
- ii. Contact number;
- iii. Full legal name;
- iv. Passport number or any comparable identification number issued by an appropriate government authority (e.g., national identification number);
- v. Date of birth;
- vi. Proof of identity (e.g., driver's license, passport, or government-issued identification documentation);
- vii. Physical home address (excluding a mailing address and/or P.O. Box); and
- viii. Additional personal information and/or documentation at the discretion of the Globiance Compliance Team.

6.2 Legal/Juristic Customer - Globiance attempts to collect, verify, and authenticate the following:

- i. Institution legal name;
- ii. Institution registration number;
- iii. Full legal name (of all account signatories and beneficial owners);
- iv. Email addresses (of all account signatories and beneficial owners);
- v. Contact numbers (of all account signatories and beneficial owners);

- vi. Institution registered address (principal place of business and/or other physical location);
 - vii. Proof of legal existence (e.g., state certified articles of incorporation or certificate of formation, unexpired government-issued business license, trust instrument, or other comparable legal documents as applicable);
 - viii. Contract information of owners, principals, and executive management (as applicable);
 - ix. Proof of identity (e.g., driver's license, passport, or government-issued identification documentation) for each individual beneficial owner that owns **10%** or more of the institutional customer Entity, as well as all account signatories;
 - x. Personal information for each entity beneficial owner that owns **10%** or more of the institutional customer entity (see the "Individual Customer" section above for details on what personal information is collected for individuals);
 - xi. Device information – Information that is automatically collected about User(s) device(s) (such as, but not limited to, hardware, operating system, browser, etc.);
 - xii. Location information – Information that is automatically collected via analytics systems providers to determine User(s) location, including User(s) IP address and/or domain name and any external page that referred User(s) to Globiance;
 - xiii. Log information – Information that is generated by the User(s)' use of Globiance that is automatically collected and stored in Our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to Globiance pages that you visit;
 - xiv. Account information – Information that is generated by the User(s) account activity including, but not limited to, trading activity, order activity, deposits, withdrawals, and account balances.
 - xv. Correspondence – Information that User(s) provide to Globiance in correspondence, including opening an account, and with respect to ongoing customer support.
- 6.3 You will be allowed to access, review, correct, and ensure the accuracy of the personal information provided from time-to-time. Globiance will also do Our part in ensuring the accuracy of User(s) personal information.
- 6.4 Personal information you provide during the registration process may be retained, even if and/or when User(s)' registration is left incomplete and/or abandoned. If User(s) are located within the US, your personal information will not be retained without the User(s)' consent.
7. **How Personal Information Collected is Used and Shared:**
- 7.1 The personal information collected, and the practices described above are performed in an effort to provide User(s) with the best experience possible, protect User(s) from risks related to improper use of Globiance Services and fraud, and help Globiance to maintain and improve provided services.
- 7.2 We may share personal information with third-party service providers (including those that may be located outside of the User(s)' country), who help Globiance operate Our platform and systems, and detect fraud and security threats throughout the normal course of Our business and service fulfillment. Such third-party service providers are subject to strict confidentiality obligations. In addition, Globiance may be compelled to share personal information with law enforcement, government officials, and regulators.
- 7.3 If Globiance decides to modify the purpose for which User(s)' personal information is collected and used, We will amend and/or update this Privacy Policy.
- 7.4 If Globiance proposes to sell and/or buy any business and/or assets, We may disclose User(s)' personal information in an anonymized form to the prospective buyer and/or seller of such business and/or assets. In the event of a merger, acquisition, or asset sale, Globiance will provide User(s) with notice if, and before, your personal information is transferred in a non-anonymized form or becomes subject to a different Privacy Policy.
- 7.5 We do not sell customer personal information to third parties for the marketing purposes.

- 7.6 Please be aware that Bitcoin, Ether, and other Digital Assets are not necessarily truly anonymous. Generally, anyone can see the balance and transaction history of any public Digital Asset address. Globiance, and any others who can match your public Digital Asset address to other personal information about User(s), may be able to identify You from a blockchain transaction. This is because, in some circumstances, personal information published on a blockchain (such as User(s)' Digital Asset addresses and IP addresses) can be correlated with personal information that Globiance and others may have.
- 7.7 This may be the case even if Globiance, or others, were not involved in the blockchain transaction. Furthermore, by using data analysis techniques on a given blockchain, it may be possible to identify other personal information about User(s). As part of Globiance's security, anti-fraud and/or identity verification and authentication checks, We may conduct such analysis to collect and process such personal information about User(s).
- 7.8 You agree to allow Globiance to perform such practices and understand that We do so.

8. CCPA Notice To California Residents

8.1 We are required by the California Consumer Privacy Act of 2018 (hereinafter referred to as the "**CCPA**") to provide this CCPA notice ("**CCPA Notice**") to California residents to explain how We collect, use, and share Your personal information, and the rights and choices We offer California residents regarding Our handling of Your personal information.

8.2 *CCPA Scope And Exclusions:*

8.2.1 This CCPA Notice, including the description of our Privacy Practices and your Privacy Rights, apply only to California residents whose interactions with Us are limited to:

- i. Visiting our consumer websites;
- ii. Signing up for email alerts; and
- iii. Applying for our job openings on our websites (however, note that the CCPA limits some of the privacy rights for job applicants).

8.2.2 This CCPA Notice does not apply to the personal information we collect, use, or disclose about:

- i. Consumers who initiate or complete the process of applying for financial products or services. This is because this information is subject to the federal Gramm-Leach-Bliley Act and implementing regulations, or the California Financial Information Privacy Act; or
- ii. Representatives of businesses that seek to obtain our products or services, or to provide products or services to Us.

8.3 *Privacy Practices*

8.3.1 Like many companies, We may use third-party cookies for Our advertising purposes.

8.4 *Privacy Rights*

8.4.1 The CCPA grants individuals the following rights:

- i. Information
 - a. You may request information about how We have collected, used, and shared Your personal information during the past twelve (12) months.
 - b. For details about the personal information, We have collected over the last twelve (12) months.
 - c. We collect this information for the business and for commercial purposes as described herein.
- ii. Access
 - a. You may request a copy of the personal information that We maintain about You.
- iii. Deletion
 - a. You can ask Us to delete the personal information that We collected or maintain about You.

- 8.4.2 Please note that the CCPA limits these rights by, for example, prohibiting Us from providing certain sensitive information in response to an access request and limiting the circumstances in which We must comply with a deletion request.
- 8.4.3 We will also respond to requests for information and access only to the extent We are able to associate with a reasonable effort the information We maintain with the identifying details You provide in Your request.
- 8.4.4 If We deny Your request, We will communicate Our decision to You.
- 8.4.5 You are entitled to exercise the rights described above free from discrimination.

8.5 *Extension(s)*

- 8.5.1 We will make an effort to fulfil verified requests within forty-five (45) days of receipt. However, the period for responding to Your verified request may be extended, based on the complexity and the number of requests received. If this extension is required, We will communicate the extension and the reason(s) for the delay within forty-five (45) days of receiving the request.

8.6 *Identity Verification*

- 8.6.1 The CCPA requires Us to verify the identity of the individual submitting a request to access or delete personal information before providing a substantive response to the request.
- 8.6.2 You may only make a verifiable request for access twice within a twelve (12) month period.
- 8.6.3 We will ask You to verify your identity when You submit a request.
- 8.6.4 We cannot respond to Your request or provide You with personal information if We cannot verify Your identity and/or authority to make the request and confirm the personal information relates to You.
- 8.6.5 Making a verifiable request does not require you to create an account with Us.

8.7 *Authorized Agents*

- 8.7.1 California residents can empower an “authorized agent” to submit requests on Your behalf.
- 8.7.2 We will require the authorized agent to have a written authorization confirming that authority.

8. Cookies

- 8.1 A "cookie" is a small piece of information stored by a web server on a web browser so it can be later read back from that browser.
- 8.2 Globiance Site(s) uses cookie and tracking technology depending on the features offered.
- 8.3 No personal information will be collected via cookies and other tracking technology; however, if User(s) previously provided personally identifiable information, cookies may be tied to such information.
- 8.4 Aggregated cookie and tracking information may be shared with third parties.

9. Accessing Your Personal Information

You may access and verify your Personal Information held by Globiance by submitting a written request to Our support team at support@Globiance.com.

10. Security

- 10.1 Globiance has stringent security measures in place to protect the loss, misuse, and/or alteration of the information under Our control.

- 10.2 Whenever User(s) change and/or access Your account information, We offer the use of a secure server. Once User(s)' information is in Our possession, Globiance adheres to strict security guidelines, protecting it against unauthorized access.
- 10.3 Globiance does its best to protect and safeguard personal information, but there are protective measures you should take, as well.
- 10.4 Do not share your personal information with others unless you clearly understand the purpose of their request and you know with whom you are dealing.
- 10.5 Do not keep sensitive personal information in your e-mail inbox and/or on Webmail.
- 10.6 If you are asked to assign passwords to connect you to your personal information, you should use a secure password and always use two-factor authentication (2FA), where available. User(s) are advised to change their password(s) regularly.

11. Dispute Resolution

- 11.1 The law of the United States shall apply to this Privacy Policy.
- 11.2 All disputes arising from this Policy will be settled by the negotiations and/or mediation of the involved parties.
- 11.3 If the dispute(s) resulting from this Policy could not be settled by the negotiations and/or mediation of the involved parties within a reasonable timeframe, the dispute will be solved in the state of **Wyoming, United States.**

Date Last Updated: 1st of March 2022 (01/03/2022).
