

# SWISSCHAIN HOLDING SA

## PRIVACY POLICY

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Version dated February 10, 2026

This privacy policy ("Privacy Policy") provides the policies and procedures of Swisschain Holding SA (the "Company") for collecting, using, storing and disclosing your Personal Data (as described below). This Privacy Policy governs the data protection of your Personal Data (as defined here below), regardless of what type of device or application you use to access our website. By using our website, you agree to the terms of this Privacy Policy.

The Company shall collect, process, store and share (collectively "collect") your Personal Data (as defined below) in accordance with the Federal Act on Data Protection dated 25th September 2020 ("FADP") and the General Data Protection Regulation ("GDPR") whichever is applicable.

By clicking the "I have read, understood and agree to the Privacy Policy" button, you expressly consent to the processing any personal data (including sensitive personal data), in accordance with our Privacy Policy. You acknowledge that such data will be processed as described in this Privacy Policy. If you do not provide this consent, we ask that you refrain from using our services.

## 1. DATA CONTROLLER

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The data controller is:

**Swisschain Holding SA**

c/o OA Legal, 1, Place de Longemalle, 1204 Geneva

If, at any time, you have questions or concerns about our privacy practices, please contact us at [contact@swisschainholding.ch](mailto:contact@swisschainholding.ch).

## 2. WHAT PERSONAL DATA DO WE COLLECT?

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### 2.1 Personal Data You Provide

When you register for, or access our website or services, we only collect the personal data, including, where applicable, sensitive personal data ("Personal Data") you provide, including:

- **Identity Data** (e.g.: name, date of birth, nationality, identification numbers, copies of ID documents)
- **Contact Data** (e.g.: email address, phone number, postal address)
- **Financial Data** (e.g.: bank details, source of funds, payment information)
- **Verification Data** (e.g.: KYC/AML documentation and due diligence information)
- **Transaction Data** (e.g.: investments, payments, token holdings, subscription or redemption information)

If you do not wish to provide such information or do not consent to its processing where required, please refrain from using the relevant services. Please note that we do not collect or process billing or payment information through the website.

## **2.2 Local Storage, Device Identifiers and Analytics**

We use local storage, cookies, device identifiers, and analytics tools to operate and improve the website. Cookies may include:

- essential cookies (functionality)
- analytics cookies (with consent)
- security/fraud-prevention cookies

You may manage preferences via your browser or our cookie management tool.

## **2.3 Log Data**

When you use the website, we may automatically collect certain technical data to help us maintain and improve the website. This may include the device's Internet Protocol ("IP") address, your device type, operating system, browser type, identification numbers associated with your devices, your mobile carrier, crash reports, timestamps of usage and other technical information.

## **3. FOR WHICH PURPOSE DO WE USE YOUR PERSONAL DATA?**

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Your personal Data may be collected to:

- contact or identify you;
- grant you access to the website and services;
- personalize and improve your experience;
- debug, monitor performance and ensure security;
- manage enquiries;
- provide or offer software updates and product announcements;
- perform identity verification and KYC/AML checks;
- process investments or token subscriptions;
- maintain participation certificate holders register;
- comply with anti-money laundering and financial regulations;
- prevent fraud, misuse or unlawful activity;
- fulfil reporting and regulatory obligations.

## **4. WHAT IS THE LEGAL BASIS FOR PROCESSING?**

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The processing of your Personal Data is based on one or more of the following:

- performance of a contract or pre-contractual measures;
- compliance with legal and regulatory obligations;
- legitimate interests (security, fraud prevention, service improvement); and
- your consent where required.

## 5. INFORMATION SHARING AND DISCLOSURE

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We will not sell your Personal Data to third parties. We may share, give access to or disclose your data only where necessary with:

- employees and authorized personnel;
- identity verification providers (e.g. Sumsub or other KYC service providers);
- banking partners and payment service providers;
- professional advisers (legal, compliance, auditors);
- blockchain or technical infrastructure providers;
- supervisory authorities or law enforcement as required by law.

### 5.1 Access by the Company

The Company and any employee of the Company who needs to access your Personal Data to comply with the Company's contractual or legal obligations will have access to your Personal Data.

### 5.2 Transfer of Data

Personal data may be transmitted to technical service providers, financial partners, supervisory authorities, or companies within the same group when necessary for the provision of services or the fulfillment of legal obligations in a country for which the level of data protection is deemed to be sufficient according to the Federal Data Protection and Information Commissioner. If a transfer occurs to a country that does not offer a level of protection recognized as adequate, the Company requires the user's explicit consent.

## 6. DATA RETENTION AND STORAGE

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We may retain and use your Personal Data as long as you use the website and as long as necessary to comply with our contractual and legal obligations. The indicative retention periods include:

- Active investors, KYC/AML documentation and transaction and accounting records: **10 years** after the termination of the relationship; and
- Technical logs: up to **12 months**

Longer retention may apply where required by law or ongoing proceedings.

## 7. SECURITY

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We implement appropriate technical and organisational measures, including the following:

- encryption;
- access controls and role-based permissions;
- secure hosting;
- regular security assessments; and
- staff confidentiality and training.

## 8. RIGHTS AND REQUESTS

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You have the right to view, amend or delete the Personal Data that we hold about you. If any of the Personal Data we hold on you is inaccurate or incomplete, please inform us at [contact@swisschainholding.ch](mailto:contact@swisschainholding.ch). You may also request the deletion of the Personal Data or object to their processing or request to restrict their processing, except in the event that the request is unfounded, for instance in presence of a legal basis or an overriding interest of the Company.

## 9. CHANGES TO OUR PRIVACY POLICY

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The Company may update this Privacy Policy from time to time by publishing a new version on the website. By continuing to use the website after those changes become effective, you agree to be bound by the revised Privacy Policy.

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## Disclaimer

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