

# HodlCC Privacy Policy

## Purpose:

The purpose of this Privacy Policy is to inform you of how HodlCC (referred to as "we", "us", "our", or "ourselves") collects and processes your personal information ("you" or "your") through its website ([www.HodlCC.com](http://www.HodlCC.com)) and any associated applications. By using the services provided by HodlCC, you agree to the collection, storage, processing, and transfer of your personal information as outlined in this Privacy Policy. These services are provided by HodlCC Ltd. (trading as HodlCC), and any of its subsidiaries and affiliates. HodlCC Ltd is a United Kingdom-based company (Companies House number 15804411,) with a registered office located at 86 - 90 Paul St, London EC2A 4NE, UK. It is responsible for the processing of personal information collected in connection with the services offered. HodlCC Ltd. is registered with the Information Commissioner's Office in the UK under reference number ZB735574.

If you have any questions regarding this Privacy Policy, feel free to reach out to us at [finance@hodlcc.com](mailto:finance@hodlcc.com).

## The type of personal information we collect

We currently collect and process the following information:

- Information you provide to us: This includes personal data such as your name, address, email address, phone number, date of birth, identity documents, username, job title, and company information. This also includes information provided when subscribing to our services, participating in surveys, providing feedback, and reporting a problem with our website.
- Information collected during communication: We collect engagement metric information such as how and when you communicated with us, how often you responded to communications, and how and when you used our products and services.
- Information collected when using our website or over the internet: This includes technical information such as IP address, login information, browser type, time zone, and operating system. It also includes information about your visit to our website, including the URL, products viewed or searched for, and methods used to browse away from the page.
- Information from publicly available sources: This includes information available on social media (depending on your privacy settings), information from resources such as Companies House, and social media engagement metrics.
- Information from other sources: We may receive additional information about you if you

use any of our services. This information may come from third-party sources such as business partners and service providers.

- Recordings or transcripts of communications: We may monitor or record phone conversations or other communications with you and keep a record of them.
- Aggregated data: This includes statistical or demographic data that does not directly or indirectly identify you. However, if this data is combined with your personal data, it will be treated as personal data and processed in accordance with our Privacy Policy

## **How we collect and process Data**

When you request a specific product or service from us or make use of those products or services, we will process your personal data to fulfill our contract with you. Additionally, we use your personal data to promote our products and services to you, enhance our website and interactions with you, and for other related purposes such as:

Maintaining your account and communication with you through various means like phone, email, text, instant messaging, etc.

Verifying your identity as part of our security process, prevent fraud and comply with legal requirements.

Providing you with information about requested products and services and similar ones that we offer.

Sharing your data with product or service providers for the purpose of validation or fraud prevention.

Notifying you of any changes to our services.

Making sure the content on our website is presented effectively for you and your device.

Analysing data in an anonymous manner for reporting purposes.

Maintaining and improving our website, and understanding user interaction with it.

Allowing you to participate in interactive features of our service, and ensuring website security.

Measuring and understanding advertising effectiveness, delivering relevant advertising to you, and making suggestions based on usage patterns.

Training and quality purposes, and checking instructions and investigating any complaints.

Complying with legal obligations or entering into contracts with you.

For compliance purposes towards Money Laundering, Terrorist Financing and Transfer Funds (Information on the Payer) Regulations 2017

Joining our waitlist for early access to the alpha version of the upcoming HodlCC App

Identify and verify your personal details to ascertain if you are a real person

We may also send you direct marketing communications with your consent, for example by email.

## **How we store your personal information**

We store your information on our secure servers located within the European Economic Area (EEA). However, when we share your information with third parties, it may require transferring it to countries outside the EEA that may not have data protection laws as robust as those in the UK or EEA. In such cases, we take all necessary measures as required by the Data Protection Legislation to ensure the appropriate protection of your information. If you require additional information on this matter, please reach out to us using the contact details provided in the "Contact" section.

Please note that while we make every effort to protect your personal data, the transmission of information via the internet is not completely secure. Thus, we cannot guarantee the absolute security of your data transmitted to our website. You assume all risk associated with any such transmissions. We have strict security procedures and features in place to prevent unauthorized access, loss or damage once we receive your information

## **How long we keep your data for**

- The length of time we keep your information depends on the purpose of use and legal requirements.
- We will retain your information for as long as necessary for the purposes outlined in this Privacy Policy and to comply with legal obligations.
- We keep an archived record of your personal data for up to 6 years after termination for the purpose of responding to legal disputes and inquiries, but will not use this data for any other purpose.
- We regularly make back-up copies of our data, which may include your personal data, and these may be kept for up to 90 days after deletion.
- If you ask us to stop sending direct marketing communications, we will keep the minimum necessary information (e.g. your name and email address) to fulfill your request.

- Inactive marketing contacts (no engagement for 12 months or email not delivered due to hard bounce) will be anonymized for aggregation purposes, except for the email address.

## **Your data protection rights**

Under the Data Protection Legislation, you have certain rights when it comes to the personal data that we have collected about you. These rights include the ability to request a copy of the information we have, to request correction of any inaccuracies, to ask for your data to be deleted or blocked, and to object to our processing of your data. However, these rights may be limited in some cases, such as if we have a legal obligation or a strong justification to continue processing your data even if you request its deletion.

If you wish to exercise any of these rights, please contact us using the contact information provided below.

The Company has designated the following person as the Privacy and Information Security Compliance Official and will be the nodal officer for implementation of all compliance requirements under this Information Security Policy.

Name: Mr. Mohit Lalvani

Contact Details: [finance@hodlcc.com](mailto:finance@hodlcc.com)

In case you feel that your personal data has been mishandled, you have the right to make a complaint. We recommend that you contact us first, but you can also file a complaint directly with the Information Commissioner's Office (ICO) in the UK or with your local data protection authority if you are located outside the UK.