

This Privacy Policy describes how ThirdFi, including the subsidiaries, affiliates and investment products we sponsor or manage from time to time collect, use, disclose and protect Personal Information we collect when you access our website or web application, enter into agreements with us, use our services and products, send us communications, or otherwise engage with us.

By creating an account with ThirdFi or by otherwise submitting Personal Information to us through the ThirdFi website, you give your consent to the collection and use of your Personal Information as explained in this policy. This policy is part of our Terms of Service.

Types of Data collected

The term “Personal Information” refers to non-public information that personally relates to or identifies you as an individual or entity.

We collect information from you when you register on our website and gather data when you participate in the investment product we provide.

When registering on our website, we may collect the following types of Personal Information:

- i. identity data which includes but is not limited to name, email address, correspondence address, nationality, phone number, date of birth, and government-issued identification information (eg. passport, ID, driver’s license, social security number, tax identification number).
- ii. transaction and financial data including cryptocurrency wallet address(es), information related to your ThirdFi account and transaction-related information for deposits or withdrawals.
- iii. device data including IP address, servers logs, device IDs or device login history.

When visiting our website, you are aware of the uses of cookies and you can choose to accept or decline cookies in your browser’s settings, while most web browsers may accept cookies automatically. If you choose to reject some cookies, you may not be able to experience the full feature of the website.

Use of Data

Any of the information we collect from you may be used in one of the following ways as required or permitted by law,

- I. Provision of our services and products in order to meet our contractual obligations
- II. To personalise your experience according to your personal interests.
- III. For Know Your Customer (KYC) reviews and Anti-Money Laundering (AML) compliance
- IV. To improve the user experience on our website according to the feedback we may collect from you.
- V. For analysis and communication purposes

We will not use your Personal Information for purposes other than those purposes we have disclosed to you without your permission. If we need to use your Personal Information for an unrelated, new, or additional purpose, we will notify you and obtain your consent to use it for such unrelated, new, or another purpose.

Protection measures

We have invested in various security software, systems and procedures to maintain a safe and secure financial environment and protect your personal, financial and historical transaction information. While no security system is absolutely impenetrable, we cannot ensure or warrant the security of any information you provide to us. We will constantly review, refine and upgrade our security technology to ensure that

your information is treated securely and in accordance with this Privacy Policy. We don't contain any of your personal information as soon as it is no longer needed for the service we provide.

Sharing your information with third parties

We do not sell, trade or disclose your Personal Information to any third parties, except to those who require access to the data in order to perform their tasks and duties and to share it with third parties who have a legitimate purpose for accessing it.

We may share, transfer or disclose your personal data to trusted third parties and/or certain types of persons in charge, involved with the operation of ThirdFi (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies, our auditors, third parties involved in hosting or organizing events or seminars) appointed, if necessary.

We may release your information when the disclosure is necessary to assert, exercise or defend legal claims or in the event that a legal obligation arises. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

We work with analytics providers who may use cookies and similar technologies to collect and analyze information about the use of the Service and report on activities and trends. These services may also collect information regarding the use of other websites, apps, and online resources. One of the service providers that we use for data analytics is Google Analytics.

Your consent

By submitting data to us and/or using our website you give your consent that all personal data that you submit may be processed by us in the manner and for the purposes described in the Privacy Policy.

Changes to our Privacy Policy

While we reserve the right to make changes to this Privacy Policy, if there is any change in the future, the latest policy will be posted on this web page and updated with the "Effective Date" below. If you are concerned about how your information is used, then bookmark this page and read this Privacy Policy periodically. Your continued use of the Service after changes to the Privacy Policy constitutes your acceptance of the new terms of the Privacy Policy.

Should you have any queries pertaining to the policy, please contact us at hello@thirdfi.org

Effective Date: March 1, 2023