

PRIVACY POLICY

GENERAL PROVISIONS

This Privacy Policy describes how Cunningham Mining Ltd. and its affiliates (hereinafter referred to as "the Company" or "we") collect, use, store, protect, and disclose information that may contain personal data of users of our services and platforms, including the website and token exchange applications, Nugget Trap.

This Privacy Policy applies to all visitors of our website, platform users, investors, and other individuals who interact with our services or contact us with inquiries.

The purpose of this Policy is to ensure transparency regarding how your personal data is processed and to guarantee our compliance with current personal data protection laws, the General Data Protection Regulation (GDPR) of the European Union (where applicable), and other privacy-related regulations.

Definitions of Key Terms That May Be Used:

- **Cookies** - small files stored on your device to collect information about your activity on the website.
- **Personal Data** - information that identifies you as an individual, including your name, email address, residence address, identification number, bank details, and cryptographic keys.
- **Data Processing** - any operation involving personal data, including collection, storage, use, transfer, and deletion.
- **Blockchain** - a decentralized digital ledger of transactions used to record cryptocurrency transactions.
- **IP Address** - a unique address used to identify a device on the internet.
- **Anonymization** - the process of removing or modifying personal information so that an individual can no longer be identified.
- **Consent** - a voluntary, specific, informed, and unambiguous expression of will, by which the data subject agrees to the processing of their personal data.
- **Cybersecurity** - measures and processes applied to protect data and information from cyber threats.
- **Processing** - any operation performed on personal data, such as collection, recording, structuring, storage, etc.
- **Processing Restriction** - the marking of stored personal data to limit its processing in the future.
- **Third Party** - an individual or legal entity, public authority, agency, or body other than those mentioned above, authorized to process personal data based on explicit instructions from the controller or processor.

Acceptance of the Policy

By using the Company's website, services, or applications, you confirm that you have read this Privacy Policy and agree to the terms of data processing as described in this document. If you disagree with the terms of the Privacy Policy, please refrain from using our services or contact us for further clarification.

Legal Grounds for Data Processing

The Company processes users' personal data based on the following legal grounds:

- 1.Necessity for Contract Performance - in cases where data processing is required to provide our services, including access to digital tokens, transactions, and other functions of the Nugget Trap platform.
- 2.Compliance with Legal Obligations - we process your data to fulfill obligations under laws regulating activities in the field of digital assets, including accounting and financial reporting.
- 3.Legitimate Interests - data processing is also conducted to ensure platform security, improve our operations, and analyze user preferences to enhance services.
- 4.Consent - in cases where we need to obtain your explicit consent to process data, for example, for marketing purposes or when transferring data to third-party partners, we do so only with your prior consent.

Contact Information

For any questions regarding this Privacy Policy or the processing of your personal data, you can contact the Company using the contact details provided on our website. We are ready to provide additional information about the collection, use, and protection of your personal data.

Your Consent and Control Over Data

We provide you with full control over your personal data and offer you choices regarding its processing. We have implemented all necessary technical and organizational measures to ensure that you can give informed consent to the processing of your data. Every user has the right to accept or reject specific types of data processing and to configure privacy settings.

Exclusion of Other Websites' Privacy Policies

Please note that this Privacy Policy applies only to our site and Nugget Trap services. We are not responsible for the privacy policies or practices of other websites that may link to our site or contain links to our site. We recommend that you carefully review the privacy policies of such third-party websites before providing them with any information.

If you do not agree with this Privacy Policy, please refrain from using our website. By using our site, you confirm that you understand and agree to the terms of this Privacy Policy.

DATA COLLECTION

We collect and process various types of personal information to provide services, enhance user experience, ensure platform security, and comply with legal requirements. This section explains the types of data we collect, methods of collection, and how we use this data.

Types of Data Collected

We may collect the following types of personal data:

- Identification Information: name, surname, date of birth, passport number or other identification document, tax identification number, email address, phone number, postal address.
- Financial Information: bank details, credit or debit card information, transaction history, payment data for transactions on the platform, including the buying and selling of tokens.
- Account Data: unique user identifier, passwords, or other authentication means for accessing the Nugget Trap platform account.
- Platform Usage Information: data about your activity on the platform, including types of transactions made, frequency of service usage, login dates and times, and actions performed on the platform.

- Technical Information: IP address, device type, browser data, cookies, location data (if permitted), visit times, operating system, and other technical specifications of the device accessing the platform.
- User Communications: any information provided by you when contacting our support team or other communications with us, including emails, chat messages, call recordings (where permitted by law).

Methods of Data Collection

Data is collected in the following ways:

- User-Provided Data: We collect data directly from you during platform registration, account creation, filling out forms to purchase tokens, participating in surveys, subscribing to newsletters, or contacting support.
- Automatically Collected Data: We automatically collect technical and some behavioral data when you access our website or the Nugget Trap platform. This may include IP address, cookies, browser type, operating system, and information about site and device usage.
- Data from Third Parties: If necessary and with your consent, we may receive your data from third parties, such as financial institutions, affiliates, or partners, to provide certain services (e.g., for transactions or identity verification in line with KYC and AML requirements).

Use of Cookies and Similar Technologies

Our website uses cookies and other similar technologies to collect technical information. Cookies help us improve the user experience, understand how users interact with the platform, and personalize content. You can manage cookie settings in your browser and disable them, but this may affect platform functionality.

Purposes of Data Collection

Personal data is collected for the following purposes:

- Provision and Maintenance of Services: We use your data to create an account, process transactions, provide access to the Nugget Trap platform, and manage your digital assets.
- Security and Authentication: We use your data to secure your account, prevent unauthorized access, protect our services, and authenticate login sessions.
- Legal and Regulatory Requirements: Your data may be necessary to fulfill obligations under the law, including compliance with Anti-Money Laundering (AML) requirements, Know Your Customer (KYC) policies, and tax reporting.
- Service Analysis and Improvement: We collect and analyze technical and behavioral data to improve platform performance, optimize the interface, and enhance the overall quality of our services.
- User Communication: We may use your contact details to respond to inquiries, send service updates, platform news, or offers.
- Marketing and Personalized Offers: With your consent, we may use data to send marketing messages and personalize offers. You may opt out of such messages at any time.

Voluntary Nature of Data Provision

Providing personal data is voluntary; however, refusal to provide certain data may limit the ability to use the Nugget Trap platform or access specific features. We only request data necessary for specific purposes and ensure its processing complies with legal requirements.

DATA USE

Collected personal data is used for various purposes related to providing services, managing the Nugget Trap platform, and complying with legal requirements. We make every effort to ensure transparency about how your data is used and guarantee that data processing is lawful and respects user rights.

Purposes of Data Use

We use your data for the following purposes:

- **Provision and Maintenance of Services:** We use your personal data to create and manage your account on the Nugget Trap platform, execute digital token transactions, and grant access to platform features. This includes verifying your identity, fulfilling orders, and processing payments.
- **User Support:** We use data to process inquiries made through customer support, assisting with issue resolution, providing additional information or recommendations about services, and maintaining feedback.
- **Administrative and Operational Purposes:** We process data for internal operations, including platform performance analysis, technical maintenance, system performance monitoring, troubleshooting, auditing, and testing new features.
- **Security Assurance:** Data is used to secure accounts, prevent unauthorized access, detect and prevent fraud, ensure the safety of our services, and protect against cyber threats. We perform user authentication and monitor suspicious activity on the platform to protect your data.
- **Compliance with Legal and Regulatory Requirements:** We are obligated to meet legal requirements, particularly financial laws regulating digital asset activities. This includes Anti-Money Laundering (AML) and Know Your Customer (KYC) policies, as well as reporting to government authorities when required by law.
- **Service Analysis and Improvement:** Collected technical and behavioral data is used to analyze user interactions with the platform, enabling us to improve our services, optimize the interface and functionality, enhance platform usability, and tailor it to users' needs.
- **User Communication:** We use contact information to communicate with you regarding account services, notify you of changes to the Privacy Policy, provide platform updates, and send important security alerts.
- **Marketing and Personalized Offers:** With your consent, we may use your data to send marketing materials, special offers, updates on new products and services, and to personalize content. You can opt out of such communications at any time.

Legal Grounds for Data Processing

We process users' personal data based on the following legal grounds:

- **Contract Performance:** We process your data when necessary to fulfill the contract established between you and the Company (e.g., to provide access to platform services and execute transactions).
- **Legal Obligation Compliance:** We are required to process your data to meet legal requirements, especially in the context of financial regulation, anti-money laundering, and user identification under regulatory mandates.
- **Legitimate Interest:** We may process data based on our legitimate interests, where processing does not conflict with your rights and freedoms. This applies to enhancing security, maintaining platform efficiency, data analysis for service improvement, and other internal operations.

- Consent: When required, we obtain your consent to process data, such as for sending marketing materials or using data in personalized offers. You can withdraw consent at any time by contacting us.

Use of Data for Automated Decision-Making

We may apply automated algorithms to make certain decisions that may impact you, specifically for fraud detection, AML/KYC compliance, and transaction processing. We ensure that all automated processes are monitored and receive additional verification when necessary. If an automated decision affects you, you have the right to request a human review of the decision, express your opinion, or contest the decision.

Data Usage Limitation

We adhere to the principle of data minimization and only use data necessary for specific purposes. Your data will not be used for any other purposes without your prior consent or unless required by law.

DATA SHARING WITH THIRD PARTIES

We strive to ensure the confidentiality and security of your personal data; however, in certain cases, data sharing with third parties is necessary to provide our services, fulfill contractual and legal obligations, or improve our operations. Data transfers are conducted in compliance with all legal requirements and protective measures aimed at ensuring user data security.

Categories of Third Parties to Whom Data May Be Transferred

1. Affiliates and Partners:

- We may share data with affiliates or partners providing services within the Nugget Trap platform, including technical support, platform maintenance, token operations, and data storage services.
- Data may be shared with affiliated companies within the Cunningham Mining Ltd. group to provide joint services or maintain a unified service standard.

2. Service Providers:

- We engage third-party providers to deliver specific services, such as payment processing, identity verification, cybersecurity, data hosting, analytics, and marketing. These providers may process your data on our behalf solely to perform specific functions for their intended purposes.
- We enter into agreements with service providers that include confidentiality terms, data protection provisions, and limitations on the use of information exclusively for fulfilling our instructions.

3. Financial Institutions and Payment Systems:

- When you conduct transactions with digital tokens or other assets, your data may be shared with relevant financial institutions, banks, or payment processors to facilitate the transactions.
- Financial data, such as account details and transaction history, may be shared to ensure the smooth operation of payment systems.

4. Government Bodies and Law Enforcement:

- We are required to share your personal data with government bodies if mandated by law, particularly for compliance with Anti-Money Laundering (AML) requirements and Know Your Customer (KYC) policies.

- Data may be shared in response to a legal request, investigation, or legal proceedings, as well as to protect our rights, safety, or property interests.

5. Legal and Consulting Services:

- We may share data with our legal advisors, auditors, or other professional consultants when necessary to ensure compliance with legal requirements, risk management, or as part of business transactions (e.g., mergers or acquisitions).

Data Transfer Procedures

When transferring your personal data to third parties, we adhere to the following principles:

- Principle of Minimization: Only the data necessary for the specific processing purpose outlined in the Privacy Policy is transferred.
- Contractual Limitations: We enter into agreements with all third parties that ensure confidentiality, security, and restrictions on the use of your personal data. Third parties may use the data solely to perform specific tasks on our behalf.
- Data Protection Assurance: Data transfers to third parties are conducted with protective measures consistent with our standards and legal requirements. We require third parties to use reliable data protection technologies and comply with all necessary requirements regarding personal information processing.

Cross-Border Data Transfers

When we transfer personal data outside your country, including to countries outside the European Economic Area (EEA), we ensure that such transfers comply with applicable data protection laws. We implement the following measures to protect your data:

- Standard Contractual Clauses: We enter into agreements with data recipients containing standard contractual clauses approved by law, particularly by the European Union, to ensure an adequate level of data protection.
- Adequacy Decisions: We verify whether the country to which data is transferred has an approved adequate level of data protection in accordance with an adequacy decision made by the European Commission or other relevant authority.
- Exceptional Cases: In certain situations where data transfer is necessary to perform the contract between you and the Company or to fulfill legal requirements, we may transfer data based on legitimate grounds provided by data protection laws.

Limitation of Liability

We are not responsible for the privacy policies and data protection practices of third parties to whom we transfer data under this Privacy Policy, as responsibility for data processing lies with the data recipient after the transfer. However, we carefully select partners and prioritize those who ensure a high level of data protection.

DATA STORAGE AND PROTECTION

We prioritize the security of your personal data and employ modern technologies and protective measures to ensure its confidentiality, integrity, and availability. This section explains how we store your data, the level of security we provide, and the duration for which we store your data.

Data Storage Principles

We adhere to the principles of minimization and retention period limitation, keeping your data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy or to meet legal requirements.

- Data Retention Period: We store your personal data only as long as necessary to provide services, fulfill contractual obligations, or in compliance with legal requirements. For example, data related to financial transactions may be stored longer to meet tax and financial legislative requirements.
- End of Retention Period: Upon reaching the end of the retention period or the achievement of the data processing purposes, we delete or anonymize your data so it no longer identifies you as an individual.

Data Protection Measures

We have implemented robust security measures to prevent unauthorized access, alteration, disclosure, or destruction of your personal data. These measures include:

1. Technical Security Measures:

- Data Encryption: We use encryption to protect personal data during internet transmission and while stored on our servers. This helps prevent unauthorized access to the data.
- Network Firewalls and Threat Protection: Our systems are protected by firewalls and antivirus systems to detect and prevent cyber threats.
- Access Control: Access to personal data is restricted to employees and partners who require it to perform their work responsibilities.

2. Organizational Security Measures:

- Privacy Policies: We adhere to internal privacy and security policies governing how employees and partners handle personal data.
- Employee Training: We conduct regular data protection training for employees, informing them of their responsibilities regarding security policy adherence and breach prevention measures.
- Monitoring and Audits: We regularly monitor and assess data security to detect and address potential vulnerabilities and conduct independent data protection audits.

3. Physical Security Measures:

- Access Control to Facilities: Access to servers and other data storage facilities is restricted to authorized personnel. We use access control systems to secure the physical infrastructure.
- Secure Data Storage: We protect physical devices where data is stored and ensure secure locations for servers and storage facilities.

Data Retention and Deletion Policy

We ensure the deletion or anonymization of personal data when it is no longer required for the purposes for which it was collected or when the legally mandated retention period has expired. Our deletion procedures include:

- Automated Deletion: We use automated systems for regular review and deletion of data that is no longer subject to retention.
- Physical Destruction: Physical information media containing personal data are destroyed in a manner that prevents data recovery.
- Archiving and Backups: For security purposes, critical data may be temporarily archived and stored in backups; however, they are also subject to deletion once the retention period ends.

Access Restriction to Data

We provide access to personal data only to employees for whom such access is necessary to perform their job duties. Access is controlled through authentication methods, multi-factor verification, and rights-based access restrictions.

Your Data Protection Rights

You have the right to request information about how your data is protected or communicate your preferences regarding its storage. If you have questions about data security or storage, you may contact our support team for further information.

Data Security Incidents

In the event of a security breach that may impact your personal data, we make every effort to promptly inform users and notify the relevant regulatory authorities within the legally specified timeframe. We investigate the incident and take appropriate measures to mitigate risks and prevent similar breaches in the future.

YOUR RIGHTS

We ensure that you have control over your personal data and can exercise your rights guaranteed by data protection laws, such as the General Data Protection Regulation (GDPR) in the European Union and other applicable laws. This section explains your data-related rights, how to exercise them, and any potential limitations that may apply.

Right of Access to Data

You have the right to confirm whether your personal data is being processed and to access this information. Upon request, we can provide you with a copy of the data stored in our system, along with additional details on its processing, including:

- Purposes of data processing.
- Categories of personal data processed.
- Recipients or categories of recipients with whom data is shared.
- Data retention period or criteria used to determine this period.
- Information about your rights, including the option to file a complaint with a supervisory authority.

Right to Data Correction

If your personal data is inaccurate or incomplete, you have the right to request that we correct or update it. We will make every effort to promptly make the necessary changes and ensure that all processed information is accurate and up-to-date.

Right to Data Deletion ("Right to Be Forgotten")

You have the right to request the deletion of your personal data in the following cases:

- If the data is no longer needed for the purposes for which it was collected or processed.
- If you withdraw your consent and no other legal grounds for processing exist.
- If you object to processing, and there are no overriding legitimate grounds.
- If the data has been processed unlawfully.
- If the data must be deleted to comply with legal obligations.

However, your right to deletion may be limited in some cases, for example, if data retention is necessary to fulfill legal obligations or protect rights.

Right to Restrict Data Processing

You have the right to request a restriction on the processing of your personal data in the following cases:

- If you contest the accuracy of the data (for the time needed to verify accuracy).

- If processing is unlawful, but you object to deletion and instead request restricted use.
- If we no longer need the data for processing purposes, but you require it to establish, exercise, or defend legal claims.
- If you objected to data processing based on legitimate interests, pending verification of whether we have overriding legitimate grounds.

During a restriction, we may only store your data and not use it unless permitted by law.

Right to Data Portability

You have the right to obtain the personal data you provided to us in a structured, commonly used, and machine-readable format, and to transfer this data to another controller if:

- Processing is based on your consent or the necessity of performing a contract.
- Processing is carried out by automated means.

This right also includes the option of direct data transfer from us to another controller if technically feasible.

Right to Object to Processing

You have the right to object to data processing at any time if processing is based on our legitimate interests. Upon objection, we will cease processing data unless we demonstrate compelling legitimate grounds for processing that override your interests, rights, and freedoms, or if processing is necessary for legal claims.

You also have the right to object to the use of your data for direct marketing purposes, and we will cease processing data for such purposes.

Right to Withdraw Consent

If processing is based on your consent, you have the right to withdraw it at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal. After consent is withdrawn, we will stop processing your data unless we have other legal grounds for doing so.

Right to File a Complaint

You have the right to file a complaint with the relevant data protection authority if you believe that data processing violates your right to privacy and personal data protection. Contact details of the relevant authority can be found on our website or by contacting our support team.

Procedure for Exercising Rights

To exercise any of the above rights, you may contact us using the contact information provided on our website. We strive to respond to all requests without delay, and no later than one month from the date the request is received. In case of request complexity or a high volume of inquiries, this period may be extended by an additional two months.

In some cases, we may request additional information to confirm your identity to prevent unauthorized access to your data.

PRIVACY POLICY CHANGES

This Privacy Policy may be updated periodically to reflect changes in our data processing practices, legal requirements, or other important privacy-related adjustments. This section explains how we will inform you about changes, when they will take effect, and what steps you can take if you disagree with the updated policy.

Reasons for Changes

We may update this Privacy Policy for the following reasons:

- Changes in Our Services or Platforms: If we add new features, services, or technologies requiring additional personal data processing, we will update this Privacy Policy accordingly.
- Changes in Legislation: If laws or regulatory requirements affecting personal data protection change, we will make appropriate adjustments to comply with the law.
- Changes in Internal Procedures or Policies: We periodically review our privacy policies and practices, and if changes are made to internal data processing procedures, we update this Policy.

Notification of Changes

When making significant changes to the Privacy Policy, we are committed to informing you in advance. Notification may be provided through one or more of the following means:

- Website Notice: We will post the updated Privacy Policy on our website or the Nugget Trap platform, indicating the date of the update. For significant changes, a banner or pop-up may appear on the website to notify you of the update.
- Email Notification: If the changes are significant or require your consent, we may send an email notification to the address listed in your account.

Effective Date

All changes to the Privacy Policy take effect from the date specified at the top of the updated version unless otherwise indicated in the notification. In cases of significant changes or those requiring your consent, we will notify you in advance, allowing sufficient time for you to review the changes and decide on the continued use of our services.

Your Actions in Case of Disagreement

If you disagree with the updated version of the Privacy Policy, you have the right to:

- Discontinue Use of Our Services: If you disagree with the terms of the updated Privacy Policy, you may cease using the Nugget Trap platform and delete your account. In this case, we will stop processing your data, except where necessary to fulfill legal obligations.
- Contact Support: You can also reach out to our support team with questions or inquiries about the changes and receive clarification on how they may affect you.

Periodic Policy Review

We recommend that you periodically review the current version of the Privacy Policy on our website to stay informed about the latest changes. Your continued use of the platform after changes to the Privacy Policy will be considered your acceptance of these changes.

CONCLUSION

We are committed to protecting your personal data and adhering to the highest privacy standards, ensuring transparency and control over your data. By using our services and the Nugget Trap platform, you entrust us with processing your data, and we value that trust. This Privacy Policy is designed to help you understand how we collect, process, store, and protect your information, as well as to ensure that you are aware of your rights concerning it.

If you have any questions, concerns, or wish to exercise your data processing rights, please contact us using the contact information provided on our website. We are always ready to help you understand our privacy policy and protect your privacy.