

Privacy Policy

Effective date: February 2025

Formidium Corp. (“Formidium”) serves the websites mentioned in the Annexure and maintains a global presence with offices located around the world. We understand that your privacy is important for you and that is why we are committed to protecting it. In order to do that, we have set up many protocols and procedures which ensure that your information is always in responsible hands and in accordance with our privacy laws. We are grateful for your trust and can assure you that we would act in a way that is beneficial for you. The below provided privacy policy describes all the points about the information we collect from you and how we use it. From time to time, we also update our privacy policy and post its effective date accordingly.

Application of this privacy policy

This privacy policy applies whenever you use any of our company’s products and browse any of our sites as mentioned in the Annexure below. The company products can lead you to use a third-party app on devices with operating systems like Android, iOS, or Microsoft windows. Whenever there is any use of your personal information or if it is being used by a third party, then this privacy policy applies unless you visit an external site through our website, in which case, refer to ‘General information’ and ‘Links to third party site’. Under this policy, all the electronic devices are covered, example, computer, laptop, tablet, mobile phone, or any other consumer electronic device.

General information

Certain other sites are linked to our site and although we are not responsible for any content mentioned in those linked sites, we encourage you to go through their privacy policies thoroughly. The external sites are not in our control and we are not responsible for the contents of any linked site or any link contained in a linked site, or any changes or updates to such sites. These links are provided for your convenience to provide further information, and the inclusion of any link does not imply endorsement by us of such site.

Information you provide us

You can visit our websites as mentioned in the Annexure anytime, but you need to provide certain basic information if you wish to get associated with us and know about our products.

We may collect information when you register with us, apply to use any of our services, become our client, Contact us in person or through the email ids mentioned on the ‘Contact us’ page on our website. We may also collect your information when you contact our support team, or when you or your organization offer to provide services to us.

When you create an account with us or request us to create an account for you, you have to provide certain personal information along with your desired username and password. Once the account is created, to log-in to your account, you would also have to create a desired password while your email address would be used as your username.

Any personal information that you share with us, example your name, address, telephone number, street address, email address along with insurance and bank related information, wallet information, fund name, account name etc. shall be kept private and confidential.

Information automatically collected

This is the information which is collected automatically from every person who visits or browses our site. This information allows us to identify you, and statistics related to you. It includes the date and time of your visit, the amount of time you spent on the site, your language preference, IP address etc. Apart from that, we may also be interested in the device related information like the model of your device, its operating system, and the name of the network company.

Information collected from third party sources

In certain circumstances, we collect personal information about you from a third-party source, for example, we may collect personal information from other government agencies, a credit reporting agency, fraud prevention agencies, financial crime agencies, an information or service provider, some of which form part of publicly available records.

Cookies

Cookies enhance the experience of a person when they visit a site, which is the reason we also use cookies to gather information about you which in turn would be helpful for us to identify you easily the next time. We transfer a cookie text file to the hard drive of your computer and then a unique number is assigned to your computer. This unique number helps us to recognize your computer and know how you browse our site.

The categories of cookies used are:

- Strictly necessary cookies - these cookies are needed to run our website, keep it secure, and comply with regulations that apply to us.
- Performance/analytics cookies – we may use performance/analytics cookies on our website. These cookies collect information about how visitors use our website and services, including which pages visitors go to most often and if they receive any error messages from certain pages. It is used to improve how our website functions and performs.

You have the option of blocking or not allowing cookies, which is provided by most of the web browsers alerting you every time a cookie is being delivered to your computer system.

Use of information

It is important for you to know how and where we put your information to use. All the data collected is subject to our privacy policy and terms of use.

When you provide personal information to us, we may use it for any of the purposes described below:

- To process your application to use our services and provide you with requested services.
- To onboard you as our new clients.
- To provide you with information or assistance that you request from us when we receive any queries or complaints.
- For conducting verifications, monitoring, and reporting following anti-money laundering and counter-terrorist financing laws.
- To notify you about the changes to our services.
- To help protect your information and prevent unauthorized access to it.
- To comply with our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
- The information may also be used for third-party products and services, limited to only those associated with us.
- To provide you with information about other services we offer that are similar to those that you have already engaged us to provide or enquired about.
- To monitor and improve the quality of our services.
- To comply with our legal and regulatory requirements.

We usually use the information to analyze what part of our site is visited most frequently and the services most searched for. This helps us design and alter our site in a better way to suit your convenience. Apart from that, your personal information may also be used for our commercial purposes. This includes offering you specified offers, products or services based on your personal information and frequent searches. Moreover, our subsidiaries may also have access to all this. For your interest, we may also need your email address to send you all the information related to our products and services.

Lawful basis for processing

We are only allowed to process personal information collected if we have a lawful basis to do so.

We at Formidium process personal information if we have a legal basis. Out of the six lawful bases allowed under the GDPR; our legal bases are as follows:

- Legitimate Interest – We process your personal information on the ground of legitimate interest, for example to provide our services, safeguard our services, understand our user preferences etc.
- Consent – We process your personal information only if you have given your consent freely for the same. We do not believe in bundled consent.
- Contractual necessity – We process your personal information only when it's necessary for performance of contract, for example, if the processing is necessary in order to fulfill our commitments under the applicable terms of service.
- Legal Obligation – We process your personal information only if the use of your information is necessary for compliance with any legal obligation.

Recipients of your information are:

We understand that you trust us and that is why we assure you that we will use your personal information only in good faith. It would only be used for your benefit or if it helps us serve you in a better way.

- Employees and Subsidiaries: We at Formidium might share your personal information with our employees, subsidiaries that need to know in order to help us provide our services or process the information on our behalf.
- Legal Requirement: We provide your personal information if we are required to provide such information in response to a court order or other applicable law or any legal process.
- To prevent fraud and protect rights: When we believe in good faith that disclosure is necessary to prevent or respond to fraud, defend our websites against attacks, or protect the property and safety of Formidium and users, or the public.
- If we have consent: We may share and disclose information with your consent or at your direction.
- Third party vendors: Formidium provides your personal information to third parties who are obligated to use the personal information that we share with them for the purpose of provision of their services to us in order to help us run our business, such as Payment Gateways or other service providers, etc.
- To Comply with Laws: In case we receive a request for information, we may disclose if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation, or legal process. We may also share your personal information with an acquirer in the event of a sale of substantially all of our assets or other change of control transaction.

Opt out rights

You have the right to stop receiving any notifications from us anytime. Through our 'opt out' policy, you can discontinue getting any emails by intimating us at unsubscribe@formidium.com or by unsubscribing from our emails. Although, you cannot opt out from receiving communications for your transactions with us or information related to your account.

Accessing your information

It is important for us to keep your personal information updated at all times and hence, we want you to keep it up to date by making changes to your account from time to time. You can log into your account anytime to modify the information. We suggest you keep it updated so that we may not have any future hindrances related to it.

If you have any doubt related to your personal information, you can ask for a copy and we will send it to you, but to access this you would have to provide us with your valid identity proof and if you fail to do so, we reserve the right to not send it to you.

Security

Although no method on the internet is 100% secure to protect private information, we strive to use the best methods to keep it safe. We have placed security protocols in all our databases, computer systems, other devices, and communication networks. So, the chance of information getting leaked is at a minimum.

We take appropriate security measures (including physical, electronic and procedural) to help protect the confidentiality, integrity and availability of your personal information from unauthorized access and disclosure.

It is also your duty to protect your information by not sharing it with others. You must never tell anyone your username and password and if you notice any unauthorized use of your account, it should be notified to us as soon as possible.

Links to third party site

This privacy policy applies only to our site and not to any other third-party site. While browsing our site, there are chances that you may get redirected to any third-party links which are not in our control and sometimes we may also link external sites to our site. We suggest you go through their privacy policy as well to avoid any confusion. We are not responsible for any personal information they extract from you.

Data retention

We are committed to only keeping your personal information for as long as we need to in order to fulfill the relevant purpose(s) it was collected for, as set out above in this policy and for as long as we are required or permitted to keep it by law.

We retain copies of our customer contracts in order to enable us to deal with any legal issues and the information provided to us for identification and verification checks,

financial crime and anti-money laundering checks (as required by law) for at least 7 years after termination or expiry of our contract with you.

International transfers

We may need to transfer your personal information within the Formidium group and to third parties, as noted above in connection with the purposes set out in this policy. For this reason, we may transfer your personal information to other countries that may have different laws and data protection compliance requirements, including data protection laws. If we do so, we will ensure that this is in accordance with the law and take appropriate measures to ensure that the level of protection which applies to your personal information processed in these countries is similar to that which applies.

If you want to receive more information about the safeguards applied to international transfers of personal information, please use the contact details provided below.

Your rights

Subject to GDPR, EU data subjects may have several rights regarding the processing of personal information including:

You being the user have certain rights in respect of your own personal information. The rights given in respect to your personal information, subject to any exemptions provided by law, including the right to:

- The Right to Information – The data subjects have the right to be informed about the collection and use of their personal information.
- The Right of Access – The data subjects have the right to access their personal information and supplementary information.
- The Right to Rectification - The data subjects shall have the right to obtain without undue delay the rectification of inaccurate personal information concerning them.
- The Right to Erasure - The data subjects shall have the right to ask for the erasure of personal information concerning them without undue delay.
- The Right to Restriction of Processing - The data subjects shall have the right to ask restriction of processing of personal information.
- The Right to Data Portability - The right to data portability gives data subjects the right to receive their personal information they have provided in a structured, commonly used and machine-readable format, and have right to transmit the same.
- The Right to Object - The data subjects have the right to object to the processing of personal information.

- The Right to Avoid Automated Decision-Making - The data subjects shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this policy, or about our processing of your personal information, you may Contact us at the below mentioned contact information. We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of personal information.

Changes to our privacy policy

Time to time, we may have to change our privacy policy in accordance with new laws and changing technology. We encourage you to visit our site frequently to see if there is any material change. It is very important for us to update our policies to serve you better. Whenever we make a change, it would reflect the new effective date. So, we suggest you to always look for the revised effective date or use 'Contact us' to know about any changes.

Contacting us

Whenever you need to enquire from us about this privacy policy, you can write to us at 3025 Highland Pkwy Suite 330 Downers Grove, IL 60515, unless otherwise provided in the Annexure. You can also call us at [+1-630-828-3520](tel:+1-630-828-3520) unless otherwise provided in the Annexure or email at the email addresses provided in the Annexure. We are always at your service and ready to clarify all your doubts.

Annexure

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| Formidium | info@formidium.com http://formidium.com/ |
| Seamless | info@oneseamless.com www.oneseamless.com |
| Common SubDoc | info@commonsudoc.com www.commonsudoc.com |
| Marketplace | info@altsmarketplace.com www.altsmarketplace.com/ |
| Finalytic | https://finalytic.com/ |
| Crypto backoffice | info@cryptobackoffice.com https://cryptobackoffice.com/ |
| Formidium tax | info@cryptofundtax.com https://cryptofundtax.com/ info@hedgefundtax.com https://hedgefundtax.com/ info@privateequityfundtax.com https://privateequityfundtax.com/ info@spvtax.com https://spvtax.com/ info@venturefundtax.com https://venturefundtax.com |
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| Ironbase Compliance | info@ironbasecompliance.com http://ironbasecompliance.com/ P: +1-630-509-4890 |
| Private Fund Admin | fundadmin@formidium.com http://privatefundadmin.com/ |
| Razor State consulting | info@razorstate.com http://razorstate.com/ |
| Seamless Alternative platform | http://seamlessalts.com/ |
| Troniq Ledger | http://troniqledger.com/ |

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| Formidium Ticketing tool | http://helpdesk.formidium.com/ |
| Formidium Singapore | http://formidium.sg/ |
| KY- BOR | info@caymanbor.com www.caymanbor.com P: +1-647-967-6362 |
| Content management | http://cm/formidium.com/ |
| CryptoTax360 | info@cryptotax360.io https://cryptotax360.io/ P: +1-217-282-7291 |