

Overview

Telcoin Autonomous Ops Ltd (“**Telcoin**”, “**our**”, or “**we**”) respects your privacy and is committed to protecting it through our compliance with this privacy policy (this “**Policy**”). This Policy describes the types of information we may collect from you or that you may provide when you visit the website [Home | Telcoin](#) (the “**Website**”), download Telcoin, a mobile application (the “**App**” and together with the Website, the “**Platforms**”), or use our services (the “**Services**”). Please note that our service offerings vary by region and additional terms may apply to your jurisdiction.

Please read this carefully as this Privacy Policy is legally binding when you use our Services. By continuing your interactions with us, such as by submitting information to us, or using our Services, you confirm that you understand and consent to the collection, use, disclosure, and processing of your personal data (or the personal data of any individual you provide) in the manner as set forth in this Privacy Policy. You have the right to withdraw your consent at any time.

We are committed to implementing reasonable procedures designed to minimize the personally identifiable data we collect. We strive to ensure that only data that is necessary to providing services to you and run our business is collected. This Policy applies to information we collect:

- On the Platforms;
- Through your registration and use of the Services;
- In email, text, and other electronic communications between you and the Platforms;
- Through mobile and desktop applications you download from the Platforms; or
- When you interact with our applications on third-party websites and services.

It does not apply to information collected by:

- Telcoin offline or through any other means, including on any other website operated by Telcoin or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from the Website.

You have the right to access your personal data, request deletion of your personal data, and request that your data be provided in a format that can be easily transferred to another service.

We have implemented robust technical and organizational measures to protect your data, including encryption where necessary and staff training. In the event of a data breach, we will work to notify you within 72 hours or other amount of time as allowed by applicable law.

In the event that we ever happen to receive sensitive personally-identifiable data and/or personally-identifiable data related to children, we shall comply with additional protections required by GDPR.

For the purposes of the applicable law concerning data protection (for example the General Data Protection Regulation (GDPR) for EU residents), the Telcoin company in charge of your information is based on your country of residence and as follows:

Country of Residence	Data Controller	Address
US	Telcoin LLC	222 Pacific Coast Highway, 10th Floor El Segundo, CA 90245

Canada	Telcoin Financial Service Ltd	Suite 2600, Three Bentall Centre, P.O. Box 49314, 595 Burrard Street, Vancouver, BC V7X 1L3, Canada
Singapore	Telocin Pte Ltd	15 Beach Road, 2nd Floor, Office 03-105, Singapore 189677
Australia	Telcoin Pty Ltd	Level 1, 8 Beulah Road, Norwood SA 5067, Australia
All other jurisdictions	Telcoin LLC	222 Pacific Coast Highway, 10th Floor El Segundo, CA 90245

Information We Collect About You

We may collect and use the following data about you:

Information You Give Us

You may give us information about you when you visit, register with or use the services on our Platforms or via face-to-face meetings and/or correspondence with us, e.g. email. This includes information you provide when you register to use our Services, participate in discussion boards or other social media functions on both our Platforms

and third party platforms, enter a competition, promotion or survey, and when you report a problem with our Platforms.

The information you give us may include your name, address, email address, phone number, financial information (including credit card, debit card, or bank account information), payment reason, geographical location, social security number, identity documents, personal description and photograph.

We may also need additional commercial and/or identification information from you,, e.g. if you send or receive certain high-value or high volume transactions, or as needed to comply with our obligations under applicable laws and regulations, including but not limited to our anti-money laundering obligations. In providing the personal data of any individual (other than yourself) to us during your use of our Services, you warrant that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.

Information We Collect About You

With regard to each of your visits to our Platforms we may automatically collect the following information:

1. details of the transactions you carry out on our Platforms or when using our Services, including geographic location from which the transaction originates;
2. Technical information, including the Internet Protocol (IP) address used to connect your computer or device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
3. Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our Customer Support number.

Please also review our Cookies Policy in Section III below.

Information We Receive from Other Sources

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties and may receive information about you from them for example, mobile wallet operators, banks and payment service providers you use to transfer money to us; mobile wallet operators, banks and payment service providers of your recipient; business partners; sub-contractors in technical, payment and delivery services; advertising networks; analytics providers; search information providers; and credit reference agencies.

Information from Social Networks

If you interact with our social media account using your social media account (for example, Facebook or Google) we may obtain and collect relevant information that is necessary to enable our Services and communicate with you. The social media network may provide us with access to certain information that you have provided to them, including your name, profile image and e mail address. We use such information, together with any other information you directly provide to us when registering or using our Services, to communicate with you about the information, products and services that you request from us. You may also be able to specifically request that we have access to the contacts in your social media account so that you can send a referral link to your family and friends. We will use, disclose and store all of this information in accordance with this privacy policy.

Cookies & Cookie Policy

Telcoin may make use of the standard practice of placing cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used

to visit Telcoin. We use Cookies to help us collect information in order to detect and prevent fraud and in order to enhance your experience.

You may refer to [All About Cookies | Online Privacy and Digital Security](#) or [About Cookies](#) to learn more about cookies and your browser. For more information on how private browsing works as well

as its limitations, visit the support pages for your browser: Microsoft Edge, Microsoft Internet Explorer, Mozilla Firefox, Google Chrome, Safari (IOS mobile and desktop) and Opera.

You can choose to block cookies by activating the settings on your browser that allow you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) some parts of the Platforms may then be limited in operation, inaccessible, or not function properly. Your browser settings also allow you to delete all cookies stored on your device whenever you wish.

If you have any questions about the cookies or similar technologies in use on our Platforms, please send an email to privacy@telco.in

We may also rely on marketing and analytical cookies on our website by our advertising and marketing service providers and partners. We also work with analytics providers which use cookies and similar technologies to collect and analyze information about use of the Service and report on activities and trends. For example, Google and Facebook.

We do not share your information with these third parties, but analytics service providers may set and access their own cookies, pixel tags, and similar technologies on the Service and they may otherwise collect or have access to information about you which they may collect over time and across different websites.

How We Use Your Information

We use your information in the following ways:

1. To carry out our obligations relating to your contracts and agreements with us and to provide you with the information, products and services that you request from us;
2. To comply with any applicable legal and/or regulatory requirements;
3. To notify you about changes to our Services;
4. As part of our efforts to keep our Services safe and secure;
5. To administer our Platforms and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
6. To improve our Platforms and to ensure other Services are presented in the most effective manner;
7. To measure or understand the effectiveness of advertising we serve and to deliver relevant advertising to you;
8. To allow you to participate in interactive features of our Services, when you choose to do so;
 - a. To provide you with information about other similar goods and services we offer;
 - b. To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you;
9. Combine information we receive from other sources with the information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive); (I) in any other way we describe when you provide the information; or
10. For any other purpose with your consent.

If you do not wish to have your email address or other contact information used by Telcoin to promote its own or third parties' products or services, you can opt-out by sending us an email stating your request to privacy@telco.in

If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt-out does not apply to information provided to Telcoin as a result of an account notification, transaction request, service experience, or other transactions. However, you may be able to adjust the media and format through which you receive these notices.

European Economic Area (EEA) Customers Only

Purposes of the Data Processing & Legal Basis

We process your personal data for the following purposes:

1. To carry out our obligations relating to your contract or agreement with us and to take steps at your request prior to entering into such contract or agreement;
2. To comply with any applicable legal and/or regulatory requirements;
3. To pursue our legitimate interests provided that these legitimate interests are not overridden by your interests or fundamental rights and freedoms. Our legitimate interests include:
 - a. Keeping our Services safe and secure;
 - b. Improving our Services;
 - c. Measuring or understanding the effectiveness of advertising we use and delivering relevant advertising to you;
 - d. Providing you with information about other similar services we offer;
 - e. Providing you, or permitting selected third parties to provide you, with information about services we feel may interest you; and
 - f. To perform a task carried out in the public interest (such as the prevention of money laundering and terrorism financing and prevention of fraud).

Disclosure of Your Information

We may share your information with selected third parties including:

1. Affiliates, business partners, payment services providers, financial institutions, suppliers and sub-contractors for the performance of any contract or agreement we enter into with them or you or any Services provided to you;
2. Advertisers and advertising networks solely to select and serve relevant adverts to you and others; and
3. Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal data to third parties:

1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

2. If we are under a duty to disclose or share your personal data in order to comply with any regulatory obligation;
3. In order to enforce or apply our Terms of Use and other applicable agreements;
4. To protect the rights, property, or safety of Telcoin, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and crime detection;
5. To assist us in conducting or co-operating in investigations or proceedings relating to fraud or other illegal activity where we believe it is reasonable and appropriate to do so;
6. In response to a subpoena, warrant, court order, order or notice of any government authority, public agency, or law enforcement agency, or as otherwise required by law;
7. To assess financial and insurance risks;
8. To develop customer relationships, services and systems;
9. For any other purpose disclosed by us when you provide the information; or
10. With your consent.

We do not control third parties' collection or use of your information when conducting services on behalf of Telcoin. However, these third parties may provide you with their own privacy policies and ways to choose not to have your information collected or used in certain ways. Please review the policies of these third parties' and your options for opting-out of information sharing.

Our Platform may also, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility for them. Please check these policies before you submit any personal data to these websites.

How We Protect Your Information

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your information against loss, misuse, unauthorized access, disclosure, and alteration and to comply with applicable laws and regulations.

The security measures include firewalls, data encryption, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and account and profile registration information. We are not responsible for protecting any personal information that we share with a third party based on an activity that you have authorized.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your information, as we cannot guarantee the security of your information during transmission, any transmission is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorized access.

We restrict access to your personal data to those employees of Telcoin who have a business reason for knowing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information.

Where We Transfer and Store Your Information

Telcoin provides international services and all information collected by Telcoin is stored on either on servers leased to Telcoin by cloud services operators (eg. Amazon Web Services, Google, Microsoft Azure) or on the servers of third party service/platform providers that Telcoin uses in providing our Services to you.

Your information may be transferred, stored and processed outside your country/region of residence. The transfer of your information may be considered as necessary in order to:

- Perform the agreement between you and Telcoin; and
- Comply with applicable laws and regulations and to respond to court orders, legal investigations, and any other orders of a court or governing body.

Your information may also be processed by staff operating outside your country/region of residence, who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the review and processing of account application, the processing and review of your transactions and the provision of support services. By submitting your information to us, you agree to such transfer, storage and processing of your information.

When we transfer your information, we put in place safeguards in accordance with applicable laws and in accordance with this Policy. We ensure that your information is treated securely by reviewing the following:

- The satisfactory level of protection as recognized by any applicable laws and regulations;
- The recipient's privacy policy or executed standard data protection clauses to comply with any applicable laws and regulations; and
- Special permissions granted as required by any applicable laws and regulations.

European Economic Area (EEA) Customers Only

Sharing of Data Outside the EEA

In order to provide our Services to you, it is sometimes necessary for us to transfer your data to the third parties outlined in Section V that are based in countries located outside of the European Economic Area which are not subject to an adequacy decision by the European Commission. In these cases, we take steps designed to ensure that both ourselves and our partners take adequate and appropriate technical, physical and organisational security

measures to protect your data. We also ensure a level of data protection at least equivalent to the one prevailing in the European Union by having appropriate contractual protections in place with these third parties.

Retention of Your Personal Information

As a regulated financial institution, Telcoin is required by law to retain your information (including transaction data) after the termination of business relations as may be required by applicable laws and regulations. The length of time we retain your personal information is determined by a number of factors, including the purpose for which we use the information and our obligations under applicable laws and regulations.

Our policy is to delete data when it is no longer required in the jurisdiction that we operate.

Accuracy Of Your Personal Information

In order to ensure that your personal information is current, complete and accurate, please update us if there are changes to your information by contacting us at privacy@telco.in together with any supporting documents. Telcoin may need to contact you to verify any changes to your information that you request.

Access To and Correction of Personal Information

Subject to applicable laws and regulations, you may have the right to request for access to your personal data that is in our possession or under our control, as well as information about the ways in which such personal data has been or may have been used or disclosed by us. Your right of access can be exercised in accordance with applicable laws and regulations. To access your information held by Telcoin, you may request a “Telcoin Subject Access Request” by sending an email to privacy@telco.in. To review and change your personal information, you contact us at privacy@telco.in together with any supporting documents. Telcoin may need to contact you to verify any changes to your information that you request.

Subject to applicable laws and regulations, you may also have the right to request for us to correct your personal data that is in our possession or under our control. For the avoidance of doubt, this right does not affect your obligations under the Terms of Use to provide complete, accurate and truthful information to us during the signup process, and to ensure that the information recorded on your Telcoin account is accurate and up to date at all times. You may send us an email at privacy@telco.in to access, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change or delete any information if we believe the change would violate any law or legal requirement, cause the information to be incorrect or if the information is required to prevent fraud or any crime.

XI. Your Rights

Non-US Customers Only

(US residents should refer to Section XV and XVI instead)

On giving reasonable notice to us, you have the right to ask us to stop collecting, using, retaining, disclosing and/or otherwise processing your personal data for any or all purposes, by contacting us at privacy@telco.in and indicating the specific purposes for which you would like us to cease collecting, using, disclosing and/or otherwise processing your personal data.

Within 10 Business Days from our receipt of your request, we will notify you of the consequences of our acceding to the same. Please note that, depending on the nature and scope of your request, we may not be in a position to continue providing our products or services to you. If you do not respond to our notice within 10 Business Days of such notice (e.g., by confirming or retracting your request), we will proceed to process your request.

Notwithstanding any such request, as indicated in Section X, we may be entitled to continue retaining your personal information, or refuse to change any personal information, in accordance with applicable laws and regulations (including but not limited to laws and regulations relating to Anti-Money Laundering and Countering the Financing of Terrorism).

European Economic Area (EEA) and Singapore Customers Only

On giving reasonable notice to us, you also have the right to transfer your personal information in our control to another organisation.

Changes to This Policy

We may change this Privacy Policy at any time by posting a revised version on this page. The revised version will be effective once it is posted. Where appropriate, we may notify you of any changes to this Privacy Policy by email. Please check back frequently to see if there are any updates or changes to our Privacy Policy, as it is legally binding on you.

Contact

If you have general questions about this Policy, Telcoin's practices, or questions your account information, contact us at privacy@telco.in

Additional Information Applicable for EEA Customers

Profiling and Automated Decision Making

We may use some of your information in order to customize our Services and to address your needs (eg. country of address and transaction history). When we do this,

we will take all necessary measures to ensure that your privacy and security are protected. We will only use pseudonymised data wherever possible. This activity has no legal effect on you.

We may use Automated Decision Making (ADM) in order to improve your experience, or to help fight financial crime. We can perform a manual double check on your demand.

US Consumer Privacy Notice

(Applicable to US Customers Only)

What Does Telcoin LLC Do With Your Personal Information?	
Why?	Financial companies choose how they share your personal information. Under federal law, that means personally identifiable information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Social Security number and employment information; • Photo identification; • Account balances, transaction history and credit information; • Assets and investment experience; • Information about user transactions, including trade frequency and trade size; and • Other information about your job, position, assets and financial sophistication.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Telcoin may share customers' personal information; and whether you can limit this sharing.

Reasons we can share your personal information	Does Telcoin LLC share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders	Yes	No

and legal investigations, or report to credit bureaus		
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes - information about your creditworthiness	N/A	N/A
For our affiliates to market to you	Yes	Yes

For non-affiliates to market to you	No	N/A
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Questions?	Go to Home Telcoin or email privacy@telco.in
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Who We Are

Who Is Providing This Notice?	Telcoin LLC
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What We Do

How does Telcoin LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Telcoin LLC collect my personal information?	We collect your personal information, for example, when you: • Set up your Telcoin wallet;

	• Perform transactions; or • Deposit or withdraw funds
How Can I Opt Out?	To Opt Out of sharing, please contact us by sending us an email to privacy@telco.in
Why can't I limit all sharing?	Federal law gives you the right to limit only: • Sharing for affiliates' everyday business purposes - information about your creditworthiness; • Affiliates from using your information to market to you; • Sharing with non-affiliates to market to you State laws and individual companies may give you more rights to limit sharing.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include: • Telcoin Financial Services Ltd • Telcoin K.K. • Telcoin Pty Ltd • Telcoin Limited • Telcoin Pte Ltd • Telcoin Malaysia Sdn Bhd • Telcoin Ltd
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Non-affiliates we share with can include third party identity and background check services/platforms.
Joint marketing	A formal agreement between non- affiliated financial companies that together market financial products or services to you. We don't currently have any joint marketing partners.

Other Important Information

- If your Telcoin account has a California address, we will not share information we collect about you with non-affiliated third parties, except as permitted by law. We will limit sharing with our affiliates to the extent required by California law. See Section XVI for further information about the rights provided to California Residents with respect to personal data we may collect about them.
- If your Telcoin account has a Vermont address, we will not share information we collect about you with non-affiliated third parties, except as permitted by law.

Additional Information Applicable for Californian Customers in US

California Consumer Privacy Act Notice

In this notice, we are addressing the disclosure requirements under the California Consumer Privacy Act of 2018 (the CCPA) for California residents. This notice applies to all California residents who visit our Platforms or use our Services.

We collect, use and share the personal data of California residents as described above.

California Consumer Privacy Act (CCPA)

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights. In addition, the California Shine the Light law (CA Civ. Code § 1798.83) requires us to provide California residents with, upon their request, the names and addresses of third parties who have received personal information and the categories of personal information shared.

California residents have the right to request that Telcoin LLC disclose what personal information Telcoin LLC has collected, used, disclosed, and sold over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you the necessary information in a portable and easily accessible format, normally within 45 days of request. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law. You may only make a verifiable consumer request for access or data portability twice in a 12-month period.

When providing information under the right to know, we will include:

- The categories of personal information the business collects about the consumer and has disclosed or sold for a business purpose
- The categories of sources of the consumer's personal information
- The business or commercial purpose for collecting and selling the consumer's personal information
- The categories of any third parties with whom the business shares the consumer's personal information or to whom personal information is sold
- The specific pieces of personal information collected about the consumer

California residents also have the right to request the deletion of their personal information, subject to certain exceptions, and may not be discriminated against because they exercise their rights under the California Consumer Privacy Act. We may require you to provide additional personal details to verify your identity before we process your request; we may not process your request if we are unable to verify your identity. In certain cases we may decline your deletion request as permitted by law.

California residents also have the right to opt-out of the sale of personal information. **In the preceding twelve (12) months Telcoin LLC and its affiliates have not sold any personal information.**

If you are a California resident and would like to make a request, please submit your request, in writing, to:

Telcoin LLC

10250 Constellation Boulevard,
Los Angeles, CA 90067, USA

Email: privacy@telco.in