



PRIVACY POLICY

Effective Date as of February 24, 2023

Comity Vanguard Marketing Management Co. L.L.C, referred to herein also as “Comity”, “we”, “us” or “our” is committed to protecting user (also referred as “you”) privacy as outlined below. This document, along with the Terms of Use, Membership Agreement and General Terms and Conditions, outlines different ways that Comity will interact with user data and was written in accordance with the Personal Data Protection Act directive and General Data Protection Regulation. Comity performs the actions with data from those who visit or use our website <https://thecomity.com>, applications and other products.

User acknowledges and gives consent to this data collection and to our Privacy Policy as a whole by using our Website, Services and Product

PERSONAL INFORMATION: GATHERING AND USE

We collect the following categories of personal data and company-related data:

Personal data and company-related data refers to any information about personal or material circumstances that we obtain and process through your Comity Membership (e.g., as an individual or business entity that enters into a Membership Agreement with us for the promotion and sale of Comity services and/or products and/or opportunities) and that can be attributed to you directly or indirectly (e.g. via your Membership ID). These details include your Membership ID, your full name, password and e-mail address, postal address, country of residence, date of birth, cryptocurrency wallet addresses etc. In addition, we will process your company name, founding date, business registration number, company address, any existing branches, your tax number, billing email address, fax number, company website, business, sales data, cryptocurrency wallet addresses, bank details, first name, last name, e-mail address, date of birth and telephone number of the company contact person, if you enter as a business entity.

Necessary financial information: financial data, transaction data and the nature of using the service, e.g. transaction sums, transaction history and other information which we may request in order to provide our services;

Personal data and company-related data that identifies you such as your IP address, language, country, browser type, and version, time zone setting, browser plug-in types, some location information about where you might be, operating system and version, page response times, download errors, how long you stay on web pages, what you do on those pages, how often, and other actions;

Other personal data and company-related data you share with us or data that we may legally obtain from some other sources.

We collect and store information through the use of “cookies” and other automated means whenever you visit our website. This information may include information such as your computer's Internet Protocol address, browser type, browser version, your login attempts, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages and other statistics. This enables us to improve our website and deliver a better service to you. We collect your IP address to track technical issues and errors so we can improve our website. We use your IP



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address and log activities to be able to avoid or eliminate fraudulent use of your account. This way we can see if there is an irregular amount of login attempts on your account to allow us to detect

fraud. In such an instance we may request you to verify your identity using your Account Information. We store your IP address and your activities on our website for this purpose in our logs. Find out more about the cookies we use in our “Cookie Policy”.

Personal data and company-related data may be used to:

- Authorise user to open an account with Comity;
- Respond to user queries or complaints;
- Contact user;
- Process and facilitate financial transactions and services;
- Maintain account security through measures such as 2FA;
- Analyse user behaviour and trends on our website to improve its performance;
- Comply with regulations such as for anti-money laundering and fraud prevention purposes;
- Anonymised market research that allows us to improve our services and optimise our performance for user experience. The user may opt for their data to be non-anonymised;
- Inform user of products and offers that may interest them, including from third-party organisations if user has agreed to allow for this type of information to be sent to him;
- If we want to sell our business or otherwise transfer part or the whole of Comity or our assets to another organisation (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), we can disclose data to the potential buyer, as well as your information may be among the items sold or transferred. The buyer or transferee will have to honour the commitments we have made in this Privacy Policy;

Personal data and company-related data may be processed by third parties to supply services to you on our behalf. These may include payment processing, search engine facilities, advertising and marketing.

We are also active on social media platforms. From time to time, we may promote our events, celebrate your achievements, organise contests and other promotions. If you contact us via social media, we process your data in order to reply to questions you may ask via social media, to contact you for congratulatory purposes or when you participate in a contest or promotion on our social media page(s). If you participate in a contest or promotion, we ask for your name (including your social media handles), address and / or e-mail address. We need this information to announce and inform the prize winner(s). We only collect this information with your consent. You will find more details on each contest or promotional activity. For congratulatory purposes, such as celebrating your achievements or for sending out birthday wishes to you, we may ask for your name, a picture of you, your day of birth and your rank. We only collect and publish this information on our social media accounts with your consent. We may use your personal data and company-related data for purposes other than those described in this Privacy Policy. We will inform you about those purposes when you register for the service, event, contest, or promotion.

From our social media pages and campaigns, we receive visitor statistics. Although Comity and our social media service provider are responsible for those visitor statistics, the respective social media service provider is your primary point of contact and handles requests to exercise your rights and



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any complaints you may have. Where necessary, we assist, the respective social media service provider in responding to your requests or complaints. For more information on the personal data

and company-related data that we receive from social media network providers and how to change your settings, please check the websites and privacy policies of the social media network providers.

LEGAL GROUND FOR COLLECTING

Consent the freely given, informed, and unambiguous indication of your wishes to the processing of your personal data and company-related data for a specific purpose which signifies agreement to the processing of personal data and company-related data.

Services - if data necessary for us to perform our services or terms of use to which you are a party or in order to take steps at your request prior to entering into the services or general terms and conditions and membership agreement.

Legal obligations - if data is necessary for compliance with a legal obligation to which Comity is a subject.

Legitimate Interests - a legal ground for the processing of your personal and company-related data when it is based on our legitimate interests or the legitimate interests of a third party, provided that those interests are not outweighed by your rights and interests and those interests have a specific purpose, they are necessary, and they are balanced.

WHO ELSE WILL SEE USER DATA

Comity uses personal information and company-related information gathered from our users in accordance with legal regulations. We may distribute personal information and company-related information to third parties such as affiliates, financial institutions, representatives, legal staff, partners, and contractors. Users acknowledge and agree that data storage, collecting and processing might be performed with third party service providers.

Information may also be shared with law enforcement or regulatory bodies in accordance with local laws.

Third parties are required to protect your personal information and company-related information and use it only for the purposes stated, such as performing a service for our Comity. All third parties are bound to comply with our privacy policy, with the exception of law enforcement and regulatory bodies.

Partners and other Third Parties are responsible for processing and obligated to legally keep and use your personal information and company-related information. Partners may include Comity representatives or affiliate parties. Payment processors, financial institutions, and services responsible for verifying your identification for security purposes are examples of other possible data processors involved in our personal data and company-related data processing system. Comity uses Sum&Substance: (<https://sumsub.com>) for KYC/AML verification; DigitalOcean: (<https://www.digitalocean.com/>) for cloud-host and maintenance the database and web content; Advanced Cash: (<https://advcash.com/>) and MoneyAmber/Moneymaple Tech: (<https://mercuryo.io/>) as payment providers.



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Comity websites and applications may link to other sites and online third-party tools and resources. Our privacy policy does not apply to these third-party entities, but to our websites and applications only. Third-party sites and resources are not under our control, and we accept no liability for the use

of these sites and resources including losses, technical failures, damages, or any other undesirable outcomes. Users are advised to familiarise themselves with the terms of use and privacy policies for third party sites and resources. Please read their privacy policies before you submit any data to them.

LEGAL RIGHTS OF USERS

Comity users may request access to their personal data and company-related data which we store. You may request that we make accurate adjustments to your data, or that we erase your data. You have the right to object to us processing your data or to change your mind regarding the permissions we have to interact with your data. You can contact us at support@thecomity.com for any of the above. In some cases, we may charge a fee to make these adjustments to data or agreements with specific customers, depending on the nature of the request.

SECURITY

Comity protects user data using encryption and takes all possible steps within our means to protect user data. We use Secure Sockets Layered (SSL) encryption among other features, such as firewalls, virus detection, and others. The user has a possibility to activate 2FA authentication and use it as an additional security measure for authentication.

Data submission is at users own risk and they are responsible for their own data. We work with affiliate organisations and partners, and they may receive your data overseas depending on our own operations.

RETENTION AND STORAGE OF DATA

Comity creates and keeps information records regarding customer accounts, activities, and transactions. These records may be stored digitally or on paper, and in most cases, digital methods are used. These records are necessary to allow us to offer our services and handle user queries, as well as for the purposes of legal compliance. If you deactivate your account in Comity, we will mark your account in our database as "Deactivated", your position within your team will remain visible, we will anonymise your personal information and company-related information, in which case it is no longer considered personal information and company-related information, but we will keep your account information in our database for at least five years. This is necessary to prevent fraud and prevent people who try to commit fraud from being able to avoid their detection by merely deactivating their account and opening another one.

We keep data for this period to comply with international and local laws and regulations around money laundering. We may keep data for over ten years in some cases for tax, bookkeeping and regulatory purposes.

Comity will not attempt to collect sensitive data not necessary for our operations, and we will not process information belonging to children (under 13 in the US, under 16 for EU residents, or other age as required by local law) ("Children"). We do not knowingly collect personally identifiable



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information from Children. If you are a parent or guardian and you are aware that your Children has provided us with personal information, please contact us. If we become aware that we have collected personal information from a child under the age of 16 (or the applicable age in their

territory) without verification of parental consent, we take steps to remove that information from our servers.

FRAUD, PHISHING AND EMAIL SCAMS

Please be notified that Comity is not in any partnership with entities who represent themselves as customer support agents, providing customer support services via email and/or social media and promising to help solve your issues for money. If you discovered what you believe is a fraud, phishing, or scam which impersonates Comity, please contact us as soon as possible.

CHANGES AND QUERIES

This Privacy Policy is subject to change at the sole discretion of Comity. We will notify users of any changes by posting the new Privacy Policy on this page. Users are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

To make an inquiry about any of the information listed within this privacy policy, please contact support@thecomity.com