

**YIELD BANK LIMITED**  
**Privacy Policy of Yield.App**  
Last revised Date 7<sup>th</sup> December 2020

**1. Introduction**

This Privacy Policy describes how Yield Bank Limited (“YIELD”, “We”, “Our”, and “Us”) collects, uses, processes, discloses, shares, transfers, and protects the information you provide on the YIELD website (“Yield.App”) as well as our mobile application (collectively as the “Platform”). This Privacy Policy constitutes a part of the Terms and Conditions of Yield.App (“T&Cs”). The terms used in this Privacy Policy shall share the same definition as those stipulated in the T&Cs except for others indicated herein.

We respect and value your privacy as well as the integrity of the information you have provided and/or permitted us to collect. Thus, we endeavor to follow industry standards to ensure the security and confidentiality of your Personal Information when you use Our Services or access Our Platform.

When accessing, registering, downloading, using, clicking, or engaging in any Services provided on our Platform, you are strongly advised to carefully read, acknowledge, understand, and accept all terms stipulated in this Privacy Policy. We will not use your information, in any shape or form, for any other purpose that has not been indicated in this Privacy Policy or the T&Cs without providing you prior notification or obtaining consent from you.

This Privacy Policy has incorporated several provisions from the General Data Protection Regulation (“GDPR”), specifically following its Personal Information Processing rules within the European Economic Area (EEA).

This Privacy Policy shall inform you about the following matters among several others:

- Acceptance of the Privacy Policy
- Personal Information collected by Us
- How We collect Personal Information
- How We use Personal Information
- How We store Personal Information
- How long We retain Personal Information
- Cookies
- Sharing your Personal Information
- Third-Party Collection of Personal Information
- Your Legal Rights
- Rights of the residents of the European Economic Area (EEA)
- Limitations

- Updates or amendments to the Privacy Policy
- How to contact YIELD

## **2. Acceptance of the Privacy Policy**

By accessing, using, or engaging in our Services, you indicate and confirm that you have agreed to the terms of this Privacy Policy. We shall not use your Personal Information for any other purpose that has not covered in this Privacy Policy or the T&Cs without providing you prior notification or obtaining your consent.

If you do not agree, either partially or wholly, to this Privacy Policy, you must immediately discontinue accessing, using, or engaging in Our Services and Platform.

## **3. Personal Information that we collect**

For the purposes of this Privacy Policy, Personal Information is information that can be used to identify, describe, relate, or associate with a particular individual. The following are the types of information We collect and store when you use Our Services:

### **3.1. Information provided by you when registering with YIELD**

When you first sign up to use Our services by opening a YIELD account, you may be required to provide us your real name, date of birth, nationality, home address, email address, signature, and other information which can be used to distinguish your identity.

Generally, we will not collect nor process "Sensitive Information" such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data that uniquely identify specific persons, or any information concerning health or sexual orientation. Thus, if you use biometric authentication methods to sign into your YIELD account, you shall be required to provide Us your fingerprint data, facial recognition data, and, more importantly, explicit consent to process your biometric data.

### **3.2. Information collected by Us for compliance purposes**

In order to comply with domestic and international industry standards, government rules and regulations, particularly Anti-Money Laundering (AML) regulations, Know Your Customer (KYC) rules, and Counter-Terrorist Financing (CTF) regulations, YIELD is required to collect your Personal Information from identification documents such as your passport, national identification card, driver's license, tax identification, and visa. Other documents We may use include, but are not limited to, your proof of the address, source of fund declaration, purpose and source of wealth etc.

### **3.3. Information collected by Us as you use Our Services**

#### **3.3.1. Usage Information**

When you engage or use Our Services, We will monitor and track your information in relation to your usage of YIELD Services such as your IP address, phone number, the type of device you use to access Our Platform, device information, operating system and hardware settings, browser type, and network operator. This information shall either be directly obtained by YIELD or through third-party service providers.

We collect this type of information to ensure that our interface and/or Platform is seamlessly accessible for all users around the world.

### 3.3.2. Communication Information

You hereby agree that We are entitled to collect and use the Personal Information you have provided on our Platform or generated through your usage of YIELD Services for the purpose of being able to communicate with you through messages, requests, emails, telephone conversions, voicemails, live chats, file attachments in connection with your transactions on YILED, or any other information related to your contact with YIELD.

### 3.3.3. Financial Information

You hereby agree that, for the purposes stipulated in this Privacy Policy, We are entitled to collect and use the information contained in or related to your financial information when you use Our Services. This includes, without limitation, your transaction history such as your initial deposit amount, your withdrawal requests, your digital wallet address(es), your investment details, bank name, bank account information, payment card number etc.

We collect this financial information to monitor suspicious financial activities to protect users from fraud, resolution of legal cases, as well as any other purposes disclosed in this Privacy Policy.

## 4. How we collect Personal Information

### 4.1. Information automatically collected by Us

We will collect and process Personal Information automatically provided by you under the following situations:

4.1.1. when you register an account, log in, or visit the Yield.App Website or our mobile application;

4.1.2. when you voluntarily complete any user survey or provide feedback to us via emails or any other electronic channels;

4.1.3. when you use browser cookies or any other relevant software upon visiting the Yield.App Website; and

4.1.4. other situations where we may automatically collect your information as described in this Privacy Policy or Our T&Cs.

### 4.2. Information collected by the third-party

We shall collect your Personal Information from third parties as required or permitted to the extent of applicable laws. Information from the third-party sources shall include, but will not be limited to, public databases, credit bureaus, ID verification partners, blockchain data, marketing partners and resellers, advertising partners, and analytics providers.

### 4.3. Anonymized and Aggregated Data

We will also collect other Information in the form of anonymized and aggregated information where all information shall be combined and then removed of personally identifiable

information, making it unusable for the identification of specific individuals. We use anonymized or aggregate users' information for the purposes stipulated in this Privacy Policy at any time, including gaining better understanding of users' needs and behaviors, conducting business intelligence and marketing initiatives, and detecting security threats. In this regard, We reserve the right to implement innovative technologies as they become available to be used for strategic planning and operational processes.

## **5. How We use Personal Information**

Your Personal Information shall be made available to YIELD, Our affiliates, and/or within Our group of companies. This will include, but not be limited to, the employees and/or any persons or third parties working for YIELD who are responsible for using and protecting your Personal Information.

We use and process your Personal Information for the following purposes or in the following ways:

### **5.1. To provide Our Services**

We use Personal information, either collected or delivered, in order to maintain and provide efficient Services (including, but not limited to, processing transactions), to improve the efficiency of day-to-day Services, and to verify your identity. We use IP addresses and unique identifiers stored in your device's cookies to help Us authenticate your identity and activities and provide YIELD Services.

### **5.2. To protect users**

We use the information collected to protect our Platforms, Users' accounts, and archives. We also use IP addresses and cookies to detect suspicious activities and to protect against automated abuse such as spam, phishing, and Distributed Denial of Service (DDoS) attacks.

### **5.3. To comply with regulations and compliance**

For Our legitimate interests, We shall use the information in compliance with Our legal obligations, global and local industry standards, government requests, and Our AML/KYC/CTF procedures. In the case where it is strictly necessary (i.e. to protect the vital interests of the users or other natural persons, to fulfil the purpose of public interest, or to pursue Our reasonable interests), We may use and process your Personal Information without obtaining your consent.

### **5.4. For measurement, research and development purposes**

We actively measure and analyze your information to understand the way you use and interact with YIELD Services. This review is continuously conducted by Our operation teams to continuously improve Our Platforms' performance and to resolve issues with user experience.

In addition, We use such information to customize, measure, and improve Our Services, Our administration, the content and layout of the Yield.App Website and mobile application, and to develop new services for you.

5.5. For communication purposes

We use your Personal Information, collected or derived from your communication devices or your email address, to interact with you directly, to provide you with necessary support, and/or to keep you informed of logins, transactions, account security details, as well as other aspects. All direct communications shall be appropriately maintained at YIELD, or the service providers designated by YIELD, to be reviewed for accuracy, retained as evidence, or used to perform other statutory requirements or other obligations as stipulated in this Privacy Policy and the T&Cs.

5.6. To enforce T&Cs

Personal Information is also used to continuously and actively enforce our T&Cs among Our users. Activities in this regard include, but are not limited to, reviewing, investigating, and preventing any potentially prohibited or illegal activities that may violate preceding provisions, or disclose relevant information to third parties in accordance therewith. In light of this, We reserve the right to suspend or terminate any YIELD Services to any Users found to be engaged in any activities that violate our T&Cs.

5.7. For marketing and advertising

We will share your Personal Information with Our marketing partners for the purposes of targeting, modelling, and/or identifying analytics as well as marketing and advertising.

5.8. For Rebates

We shall share the Personal Information collected from you, including, but not limited to, your Identification Information and Transaction Information, with your referrer for the purposes of rebates and other benefits.

5.9. For other purposes

We shall not use your Personal Information for purposes other than the purposes stipulated in this Privacy Policy without your prior consent. If We need to process or use your Personal Information for other purposes, We shall notify and request for your consent to use such information.

**6. How we store Personal Information**

We shall take great care in implementing and maintaining the security of YIELD's Services as well as that of your Personal Information. We employ procedures and policies that incorporate industry best practices to ensure the integrity of your Personal Information and to prevent instances of unauthorized use.

Our Platform security is fully integrated into Amazon Web Services, covering all aspects of security such as identity management, connection security, application security, and database security for user interactions with YIELD.

Please note that it is impossible to fully guarantee the security of your Personal Information. While we take reasonable steps to safeguard your Personal Information, we shall not hold any responsibility for the acts committed by those who gain unauthorized access or abuse your information and services. Thus, you are recommended to understand this responsibility and to independently take safety precautions to protect your Personal Information, particularly your credential information such as your username and password. You hereby agree that we shall not

be liable for any information leakage and other losses not caused by our intention or gross negligence, including, but not limited to, hacker attacks, power interruptions, or unavoidable technical failures.

## **7. How long We retain Personal Information**

We shall be required by applicable laws and regulatory requirements to retain certain information, including Personal Information of users, users' profiles, identification verification materials, information relevant to AML/KYC/CTF procedures, account information, account agreements, and other agreements between Us and third-parties, account statements, and other records.

Such records shall generally be retained as required by law for the minimum amount of time necessary to accomplish the purpose for which it is collected; and thereafter no longer than is permitted under YIELD's information retention policy.

However, even after you deactivate your account, We may retain copies of information about you and any transactions or services which you may have participated in for a period of time that is consistent with applicable laws, the applicable statute of limitations or as we believe is reasonably necessary to comply with applicable laws, regulations, legal procedures, or governmental requests in order to detect or prevent fraud, collect fees owed, resolve disputes, address problems with Our Services, assist with investigations, enforce any of Our terms and conditions or other applicable agreements or policies, or to take any other actions consistent with applicable laws.

## **8. Cookies**

We shall use cookies and other technologies or methods of web and mobile analysis to gather, store, and track certain information related with your access to and activities through the Services, including when you visit the Yield.App website.

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are beneficial and may be used for various purposes. These purposes include, among other things, allowing you to navigate between pages efficiently, enabling automatic activation of certain features, remembering your preferences and making the interaction between you and the Services quicker, easier and smoother. Our Website shall use the following types of cookies:

### **8.1. Strictly Necessary Cookies**

These cookies are essential to enable you to log in, navigate a website, and use its features or to provide a service requested by you. We shall not need to obtain your consent in order to use these cookies.

### **8.2. Functionality Cookies**

These cookies allow the Website to remember choices you make (such as your username, language, or the region you reside in) and provide enhanced, more personal features. The information these cookies collect remains anonymous, and they cannot track your browsing activity on other websites.

### 8.3. Performance cookies

These cookies collect information about how you use a website, for example, which pages you go to most often, record difficulties you may experience while using the Website such as error messages. All information collected by these cookies is aggregated and therefore anonymous. It is only used to improve the efficiency of the Website.

### 8.4. Targeting Cookies or Advertising Cookies

These cookies are used to deliver advertisements tailored to you and your interests specifically. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. These cookies remember that you have visited a website, and this information is shared with other organizations such as advertisers. Quite often targeting or advertising cookies shall be linked to the sites' functionality provided by the other organizations.

You may remove these cookies by following the instructions of your device preferences. However, if you choose to disable cookies, some features of YIELD Services may not operate properly, and your online experience may be limited.

## 9. **Sharing your Personal Information**

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

We may share, transfer, disclose, or allow access to your Personal Information to the following third parties for the purposes described below:

- 9.1. We may disclose Personal Information to the third parties in order to administer or process a transaction, or Services you have authorized or requested, or in the context of facilitating the execution of a transaction.
- 9.2. We shall be required to validate your identities by applicable laws and regulatory requirements and rely on third-party services to perform these validations. Personal Information that you provide to Us during the account opening process is passed to these services at account opening and on an ongoing basis thereafter.
- 9.3. We provide Personal Information that you provide during the account opening process, as required by applicable laws and regulatory requirements, to carry out or aid in certain functions, such as, but not limited to, account processing, surveillance, reconciliation, execution, document retention requirements, and document dissemination.
- 9.4. We share your information with financial institutions with which we partner to process payments which you have authorized.
- 9.5. We may share analyses based on anonymous user information or behavior with Our affiliate companies in order to operate and improve products and services.
- 9.6. We may disclose or transfer information We collect to a purchaser of our business.

- 9.7. We may disclose or transfer information we collect upon account closing where you have a deficient balance, or upon excessive instances where you do not have sufficient funds in your account.
- 9.8. We may disclose Personal Information for certain promotions and special offers when the nature of the promotion or special offer requires us to gather and share your Personal Information (such as your email address) with a third-party for delivery of goods or services. Should you choose to purchase a product or service offered by another company by way of a promotion or special offer, any Personal Information you share with that company would no longer be governed by this Privacy Policy.
- 9.9. We may disclose Personal Information to third parties that provide services, such as, but not limited to, consulting, sales, client support operations, payment processing, authentication services, and technical support or services.
- 9.10. We may share your information with law enforcement, and government officials, or other third parties when We are compelled to do so by a subpoena, court order, or similar legal procedure, or when We believe in good faith that the disclosure of Personal Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of any of Our terms and conditions or any other applicable policies.
- 9.11. We may disclose information to third parties about your account or the transactions you make if you give Us your written permission.
- 9.12. Other circumstances under which We may disclose your Personal Information include but is not limited to the following:
  - 9.12.1. comply, as necessary, with applicable laws and regulatory requirements;
  - 9.12.2. respond to mandatory legal or governmental requests or demands for information;
  - 9.12.3. meet national security requirements;
  - 9.12.4. enforce Our agreements, policies, procedures and/or T&C's;
  - 9.12.5. protect ourselves, our affiliates, Our users, Our counterparties or the general public from illegal activities; and
  - 9.12.6. respond to an emergency that requires disclosure of specified information.

We do not share your Personal Information with affiliates and the third parties for their benefits unless you have given us your consent. However, you may freely opt-out of having your Personal Information shared with third parties, or from allowing Us to use your Personal Information for any purpose that is incompatible with the purposes for which We originally collected or subsequently obtained your authorization as stipulated in this Privacy Policy.

All affiliates and third parties with whom We share your Personal Information have their privacy policies. However, they shall be expected to protect this information in a manner that aligns with the provisions described in this Privacy Policy.



## **10. Third-Party Collection of Personal Information**

This Privacy Policy only addresses the use and disclosure of the Personal Information We collect from you. To the extent that you disclose your information to other parties through the use of Our Services such as by clicking on a link to any other websites, different rules regarding Privacy Policies may apply to their use or disclosure of the Personal Information you disclose to them.

You hereby acknowledge that We shall not be responsible for the products, services, or descriptions of products or services that you receive from the third-party websites or to the content or privacy practices of those websites. Also, this Privacy Policy shall not be applied to any such third-party products and services that you access through our Platform. You are knowingly and voluntarily assuming all risks of using third-party websites to purchase products and services, and you agree that We shall have no liability whatsoever concerning such third-party websites and your usage of them.

## **11. Your Legal Rights**

Under certain circumstances, you have the rights under the data protection laws in relation to your Personal Information. These rights include the followings:

### **11.1. Right to be informed**

You reserve the right to be informed about the collection, use, and process of your Personal Information.

### **11.2. Right of access**

You reserve the right to make a request for a copy of the Personal Information We hold about you and specific information regarding Our processing of this information.

### **11.3. Right to rectify**

You reserve the right to request Us to update, correct, or complete your Personal Information that you believe to be outdated, inaccurate, or incomplete. You shall rectify at any time by signing into your YIELD account and clicking the Profile.

### **11.4. Right to erasure**

You may request to have your Personal Information deleted from Our record where certain conditions are met.

In order to deter fraudulent activities by ensuring that those who try to commit fraud shall not be able to avoid detection simply by closing their accounts and opening new accounts, We shall mark your account in our database as "Closed," but shall keep certain account information, including your request to erase your Personal Information in our database for a period of time. However, if you close your account, your Personal information shall not be used by us for any further purposes, nor shared with third parties, except as necessary to prevent fraud and to assist law enforcement as required by law or in accordance with this Privacy Policy.

### **11.5. Right to data portability**

You reserve the right to request to transfer a machine-readable copy of your Personal Information to you or the third-party of your choice. We shall provide you, or the third-party,

your Personal Information in a machine-readable format. This right only applies to Personal Information you have consented Us to use.

**11.6. Right to restrict processing**

You may request Us to restrict or suppress the processing of your Personal Information under certain circumstances as follows:

- 11.6.1. to establish the accuracy of the Personal Information;
- 11.6.2. when the processing is considered unlawful, but you do not wish to have your Personal Information erased;
- 11.6.3. where We no longer need to process your Personal Information, but the information must be retained for legal reasons; and
- 11.6.4. where you have objected to Our processing your Personal Information, but We need to determine whether Our legitimate interest overrides your objection.

**11.7. Right to object**

You may object to our reliance on our legitimate interests as the basis of Our processing of your Personal Information that impacts your rights. You may also object to Our process of your Personal Information for direct marketing purposes.

**11.8. Right to withdraw consent ("Opt-out")**

You reserve the right to withdraw your consent at any time where We are relying on it to process your Personal Information. Withdrawing your consent does not affect the lawfulness of Our processing of your Personal Information prior to withdrawing.

If you wish to exercise these rights as aforementioned, please inform and contact Us via our Platform, including Yield.App website.

**12. Rights of the residents of the European Economic Area (EEA)**

If you are a resident of the European Economic Area, United Kingdom, or Switzerland at the time your Personal Information is collected, you still reserve every legal right as stipulated in Clause 10 as mentioned above. Also, We shall specifically apply legal requirements under the General Data Protection Regulation (GDPR) for collecting, using, or processing your Personal Information.

In the case where some recipients are locating outside the EEA, We shall transfer your Personal Information only to such countries as approved by the European Commission as providing an adequate level of data protection or enter into legal agreements ensuring an adequate level of data protection in the jurisdiction of the party receiving the information.

**13. Limitation**

- 13.1. Our Services are not designed for the individuals who are under the age of 18 or under the legal age to provide consent under the applicable laws of country or jurisdiction where you are using Our Services.

If you are not over 18 or of the legal age of your country, you shall not provide any Personal Information to Us, or to engage in our Services. We reserve the right to access and verify any Personal Information collected from you. If We are aware that you are under 18 or under the legal age who already shared your Personal Information with Us, we shall then discard such information and terminate your account immediately.

- 13.2. We cannot guarantee that any losses, misuses, unauthorized accession, or alteration of your Personal Information shall not occur. You hereby agree that you play a vital role in protecting your Personal Information, including your credentials. When registering with Our Services, you are strongly recommended to choose a password with the sufficient length and complexity and to not reveal this password to any third parties, or unauthorized persons. Also, you agree that you shall immediately notify Us if you become aware that unauthorized persons access your YIELD account.

**14. Updates or amendments to the Privacy Policy**

We shall revise and update this Privacy Policy periodically, at Our sole discretion, and the most current version shall be published on our Yield.App website or YIELD Platform (as reflected in the "Last Revised" heading).

In the event of any material changes which may affect your usage on Our Services and Platform, We shall notify you through your email address or other communication channels you provide to Us. We encourage you to review this Privacy Policy actively. If you do not agree, either partially or wholly, the revised Privacy Policy, you should discontinue accessing or using Our Services. Your continued access to and use of Our Services after any changes to this Privacy Policy constitutes your consent to any changes and agree to continue using the Services.

**15. How to contact YIELD**

For any questions regarding this Privacy Policy, your Personal Information collected or proceeded by Us, or in case you would like to exercise one of your legal privacy rights as stipulated in Clause 10, please submit your requests to [info@yield.app](mailto:info@yield.app) and visit our Yield.App Website at [www.yield.app](http://www.yield.app)