

VALENCY PRIVACY POLICY

At Valency, we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth). This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

What information do we collect and how do we use it?

When you use the Valency Platform, we ask you for the information we need to verify your identity and support such services provided on Valency in order to facilitate the provision of buying, selling and trading digital currency. This can include a broad range of information ranging from your name, address, contact details, IP address, device information, operating system, web log information, passport number, driver licence number, bank account numbers, and digital currency account information. We may provide the information that you provide to identity verification services, credit bureaus or to our customer support team to enable them to verify your identity under Anti-Money Laundering policies and to protect you and other users of our Platform from fraud and other illegal activities. We may also provide your personal information if requested by a law enforcement or government agency. We also use your information to enable us to manage your ongoing requirements and our relationship with you, e.g. to process transactions, email you a notice or receipt of your transaction, troubleshoot a problem, send promotional offer, prevent or investigate illegal or potentially illegal activities, and to customise and improve Valency's Platform. We may do so by electronically unless you tell us that you do not wish to receive electronic communications. From time to time we will use your contact details to send you offers, updates, events, articles, newsletters or other information about products and services that we believe will be of interest to you. We may also send you regular updates by email. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so. We may also use your information internally to help us improve our services and help resolve any problems.

What if you don't provide some information to us?

If you do not provide us with some or all of the information that we ask for, we may not be able to verify your identity and as such you may not be able to open a trading account with Valency and use our Platform.

How do we hold and protect your information?

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements We hold the information

we collect from you in highly secure data centres operated by a third party. The datacentres used have ISO 27001, 27017 and 27018 certifications and PCI DSS7 compliance. This has been independently audited by third parties. ISO 27018 certification has also been achieved for our data centre partners, which demonstrates a system of controls in place that specifically address the privacy protection of customer content. We ensure that your information is safe by managing access controls, such as identity, access management, permissions and security credentials. Access to personal information is only granted to an employee of Valency to carry out duties required to support our customers. Strong, multi-factor authentication is used and access is revoked when no longer required.

Will we disclose the information we collect to anyone?

We do not sell, trade, or rent your personal information to others. We may disclose your information to law enforcement agencies in Australia if requested as part of an investigation. We may disclose some of your personal information to third party suppliers and service providers (e.g. an email sending service), third party identity verification services, or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will take all reasonable steps to ensure that they protect your information in the same way that we do. We may provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits.

How can you check, update or change the information we are holding?

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete. We will allow you to correct, amend or delete certain personal information on our Platform by logging into your Valency account and clicking on the settings section. In some cases, to ensure security and integrity of the Platform, we may be required to maintain historical personal information you have submitted to us. You may also seek to access or correct your personal information by submitting a support request from Valency's website. We do not charge for receiving a request for access to personal information or for complying with a correction request. In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

What happens if you want to complain?

If you have any concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please submit a support request from Valency's website or email us at Valency Privacy. Your complaint will be considered by us through our internal complaints resolution process and we will try to respond with a decision within 45 days of you making the complaint.

Your Consent

By opening an account with Valency and using our Platform and Services, you consent to the collection and use of the information you have provided to us for the purposes described above.

Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please submit a support request from Valency's website or email us at Valency Privacy.

Web Data

Anonymous data

We use technology to collect anonymous information about the use of our platform. For example, when you browse our platform our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

Cookies

In order to collect this anonymous data, we may use "cookies". Cookies are small pieces of information which are sent to your browser and stored on your computer's hard drive. Cookies are utilised by almost all websites that you visit and allow websites and browsers to operate more efficiently, improve your browsing experience as well as to provide anonymised information to the owners of the site.

Sometimes they identify users where the Platform requires information to be retained from one page to the next. This is purely to increase the functionality of the site. We may use Cookies to recognise you as a customer and user of Valency's Service, to customise our services and advertising, and to collect information in order alleviate the risk of fraud and illegal conduct. We may also utilise cookies to assist in delivering targeted advertising campaigns at certain times through third party sites.

Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. You can also de-activate the use of cookies if you do not want to receive targeted advertising however; although this may impact the operation of the website. In order to provide a more user-friendly experience and enhance security, cookies will also be used to allow our website to recognise your computer when you return in the future.