**Privacy Policy**

Effective as of December 01, 2023

Welcome to **Cubera’s Privacy Policy** relating to the provision of our services at https://cubera.finance and/or any local country-code websites and/or any sub-website and/or associated domains (and/or sub-domains) and any related software applications (the "Website"), where Personal Data is processed by the same relating to you.

We respect your privacy and we are committed to protecting your Personal Data. This commitment exists throughout the lifecycle of the Personal Data which you provide to us, from the design any of our services which use personal data to the deletion of that data. We process your Personal Data in compliance with the Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data of the UAE, the EU General Data Protection Legislation Regulation 2016/679, and other laws and regulations related to your state of residency.

This Privacy Policy will inform you as to how we use and look after your Personal Data.

**1. Introduction**

This Privacy Policy explains how Cubera Finance FZCO, company registered under the legislation of the United Arab Emirates (the "Company" or "we" or "us") collects, stores, uses, transfers and shares Personal Data from our users ("you") in connection with https://cubera.finance Website including any products and services related to it.

We reserve the right to and may change this Privacy Policy from time to time. If we make any material changes, we will notify you by email (sent to the email address specified during filing of a contact form) by presenting you with a new version of this Privacy Policy. Your continued use of the Website after the effective date of an updated version of the Privacy Policy will indicate your acceptance of the Privacy Policy as modified. In some cases, you will have to accept changes to the Privacy Policy explicitly. **Please review our Website for the latest updates on our data privacy practices.** If you don’t accept the terms of the Privacy Policy, we ask you not to use the Website. Please exit the Website immediately if you do not agree to the terms of this Privacy Policy.

**2. Transparency about how we collect and use your Personal Data**

Personal Data, or personal information, means any information about an individual from which that person can be identified, directly or indirectly. It does not include data where the identity has been removed (anonymous data).

We may collect Personal Data from you because of a legal reason or because you have consented us to do so for a specific purpose. We may collect, use, store and transfer different categories of Personal Data about you specified in this Privacy Policy.

**3. What Personal Data we collect**

When you enter the Website to use our services you don’t need to provide any Personal Data except number of your digital wallet. The services are being provided fully decentralized via the smart contract and its provision doesn’t require any specific personal details.

When you submit a contact form at the Website, we may collect the following Personal Data:

* Name
* Email address
* Mobile phone number

To collect information for analytic purposes, we may also send cookies to your mobile device or computer or engage other tracking technologies. See more in our **Cookie Policy**.

**Information we receive automatically.** Because of how browsers work, we may receive some information automatically when you visit the Website. This information includes the type of device you are using (possibly including unique device identification numbers, for some beta versions of our mobile applications), the type and version of your browser, your browser's language preference, the type and version of your device's operating system, in some cases the name of your internet service provider or mobile carrier, the website that referred you to our Website, which pages you request and visit.

We do not collect any special categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life or sexual orientation, political opinions, trade union membership, information about your genetic and biometric data).

As any compliant organization we will not collect and use your Personal Data without letting you know or having any reasons for that whatsoever. So, for any purpose of processing your Personal Data we need to have legal basis.

**4. Use of Personal Data**

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

* to process your contact forms;
* to communicate with you and to keep you informed of our latest updates to our services;
* analyzing how customers use the Website;
* to know your preferences and to try to ensure that the content on our Website is presented in the most effective manner for you and your computer or mobile device;
* to communicate with you and to process any of your requests to exercise your legal rights;
* to identify and authenticate your access to certain features of the Website;
* to detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of our services, including by identifying risks associated with your activity on our Website;
* to investigate violations of our policies and Terms of Use as well as enforce our policies and the Terms of Use; and
* to investigate and resolve disputes in connection with your use of our Services.

We will not process Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by you or collect any Personal Data that is not needed for the mentioned purposes. For any new purpose of processing we will ask for your separate consent.

**No commercial use of Personal Data**. We will never sell, rent, or disclose your Personal Data. We may share only some of your Personal Data to our service providers strictly limited to cases and purposes stipulated in this Privacy Policy.

**5. Your rights**

As a data subject, you have the following rights over your personal information, which our Privacy Policy and our use of Personal Data have been designed to uphold:

**Access to your Personal Data.** The Website gives you the ability to access Personal Data within the Website. You have a right to request information about what Personal Data we have about you, to access all your Personal Data and receive a copy of it. We also commit to notify you, as required under applicable laws, about Personal Data breaches related to your Personal Data.

**Restriction of Processing.** You also have a right to request that the processing of your Personal Data be restricted. If you contest the accuracy of the Personal Data, we will need some time to verify its accuracy.

**Objection to the processing of your Personal Data.** In some cases you can object to the processing of your Personal Data, for example, if we process it under legitimate interest basis by contacting us at support@cubera.finance.

**Correction of Personal Data.** If you find out that your Personal Data is inaccurate or incorrect, you have a right to contact us and ask us to correct such Personal Data.

**Erasure of your Personal Data.** You may ask us to erase your Personal Data, if you withdraw your consent to processing, if you believe such processing is not compliant with applicable law and in some other cases.

**Execution of your privacy rights.** You may contact us at support@cubera.finance to exercise any of your privacy rights. We will exercise them within 15 days after receipt. It may take us up to 45 days in some cases, for example for full erasure of your Personal Data stored in our backup systems. We will let you know if we need more time and explain the reasons for the delay.

**6. Disclosure of information**

We will not share your Personal Data with any third parties except as specified herein:

* in response to subpoenas, court orders or legal processes, to the extent permitted and as restricted by law (including to meet national security or law enforcement requirements);
* when disclosure is required to maintain the security and integrity of the Website, or to protect any user’s security or the security of other persons, consistent with applicable laws. In such cases we may also delete some of your Personal Data (e.g. resetting your password to avoid unauthorized access);
* when disclosure is directed or consented to by the user who has input the Personal Data;
* in the event that we go through a corporate transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of its assets, your information will, in most instances, be part of the assets transferred.

**7. How we protect your Personal Data**

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We have designated a Data Protection Officer to strengthen our data protection measures. To establish communication with our Data Protection Officer, please email at dpo@cubera.finance.

**8. Storing of Personal Data**

We store Personal Data obtained from you by using of dedicated data storing infrastructure, based on our own servers and third-party service providers. We and our service providers store and process your Personal Data in the European Union, Switzerland, the United States of America and elsewhere in the world. Local data protection regulation of these jurisdictions are using legal processes to access your personal data.

**9. Retention of the information**

We will retain your Personal Data as long as needed to provide you services, and only for as long as it serves purposes of processing identified in this Privacy Policy. At any time, you can erase your Personal Data in accordance with the Privacy Policy.

**10. Security breaches**

If we detect of a security systems breach, we may either post a notice, or attempt to notify you by email and will take reasonable steps to remedy the breach as specified in applicable law and this Privacy Policy. If we learn of a potential Personal Data breach, together with other applicable actions (such as notifying you in certain cases), we will also undertake particular actions to remedy the breach.

If you want to report a security incident related to the Website please contact us at support@cubera.finance or dpo@cubera.finance.

**11. Who we are and how to contact us**

The Company is based in the United Arab Emirates, and Personal Data we collect is governed by the UAE law. Please be advised that UAE law and laws of other countries may not offer the same protections as the law of your jurisdiction.

In addition, you agree that Personal Data collected may be stored and processed in the United States, where the Company rents servers, or in any other country in which the Company or its affiliates, subsidiaries or agents maintain facilities, and by using the Website, you consent to any such transfer of Personal Data outside of your country.

If you have any questions or concerns about your privacy, you may contact us at:

Cubera Finanec FZCO, Dubai, United Arab Emirates

Email: info@cubera.finance or dpo@cubera.finance