

Privacy Notice – DoubleZero Foundation

The purpose of this document is to provide you with information on the use of your personal data in accordance with the Cayman Islands Data Protection Act (as amended) and, in respect of any EU data subjects, the EU General Data Protection Regulation (together, the “*Data Protection Legislation*”).

Your personal data

By virtue of providing us with personal information on individuals connected with you (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes personal data within the meaning of the Data Protection Legislation. We may also obtain personal data on you from other publicly accessible directories and sources.

This includes information relating to you and/or any individuals connected with you such as: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details.

How we may use your personal data

We, to the extent we are a data controller under the Data Protection Legislation, may collect, store and use your personal data for purposes including the following:

The processing is necessary for the performance of a contract, including:

- facilitating the continuation or termination of our contractual relationship; and
- facilitating the transfer of funds, and administering and facilitating any other transaction, between us.

The processing is necessary for compliance with applicable legal or regulatory obligations, including:

- undertaking due diligence including anti-money laundering and counter-terrorist financing checks, including verifying your identity and address (and, where applicable, your beneficial owners);
- sanctions screening and complying with applicable sanctions and embargo legislation;
- complying with requests from regulatory, governmental, tax and law enforcement authorities;
- surveillance and investigation activities;
- carrying out audit checks, and instructing our auditors;
- maintaining statutory registers; and
- preventing and detecting fraud.

The pursuit of our legitimate interests, or those of a third party to whom your personal data may be disclosed, including:

- complying with a legal, tax, accounting or regulatory obligation to which we or the third party are subject;
- assessing and processing requests you make;
- investigating any complaints, or pursuing or defending any claims, proceedings or disputes;
- providing you with, and informing you about, products and services;
- managing our risk and operations;
- complying with audit requirements;
- ensuring internal compliance with our policies and procedures;
- protecting us or related entities against fraud, breach of confidence or theft of proprietary materials;
- seeking professional advice, including legal advice;
- facilitating business asset transactions involving us or related entities;
- monitoring communications to/from us (where permitted by law); and
- protecting the security and integrity of our or related entities' IT systems.

We will only process your personal data in pursuing our legitimate interests where we have considered that the processing is necessary and, on balance, our legitimate interests are not overridden by your legitimate interests, rights or freedoms.

Sharing your personal data

We may share your personal data with our affiliates and delegates. In certain circumstances we may be legally

obliged to share your personal data and other financial information with relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities and other applicable regulatory authorities. In exceptional circumstances, we will share your personal data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened) in any country or territory.

Our affiliates and delegates may process your personal data on our behalf, including with our banks, accountants, auditors and lawyers which may be data controllers in their own right. Our service providers are generally processors acting on our instructions. Additionally, a service provider may use your personal data where this is necessary for compliance with a legal obligation to which it is directly subject. The service provider, in respect of this specific use of personal data, may be deemed to be acting as a data controller.

Sending your personal data internationally

Due to the international nature of our business, your personal data may be transferred to jurisdictions that do not offer equivalent protection of personal data as under the Data Protection Legislation. In such cases, we will process personal data or procure that it be processed in accordance with the requirements of the Data Protection Legislation.

Retention and deletion of your personal data

We will keep your personal data for as long as it is required by us. For example, we may require it for our legitimate business purposes, to perform our contractual obligations, or where law or regulation obliges us to. Some personal data will be retained after your relationship with us ends. We expect to delete your personal data (at the latest) once there is no longer any legal or regulatory requirement or legitimate business purpose for retaining your personal data.

Automated decision-making

We will not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your personal data, unless we have considered the proposed processing in a particular case and concluded in writing that it meets the applicable requirements under the Data Protection Legislation.

Your rights

You have certain data protection rights, including the right to:

- be informed about the purposes for which your personal data are processed;
- access your personal data;
- stop direct marketing;
- restrict the processing of your personal data;
- have incomplete or inaccurate personal data corrected;
- ask us to stop processing your personal data;
- be informed of a personal data breach (unless the breach is unlikely to be prejudicial to you);
- complain to the Data Protection Ombudsman; and
- require us to delete your personal data in some limited circumstances.

Contact us

We are committed to processing your personal data lawfully and to respecting your data protection rights. Please contact us at legal@doublezero.xyz if you have any questions about this notice or the personal data we hold about you marking your communication “[YOUR NAME] – Data Protection Enquiry”.