

# Privacy Policy | Moneta.Global

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Moneta Digital LLC and its affiliates (collectively, “Moneta”) are steadfast in our commitment to safeguarding the privacy and integrity of your personal information, whether you are a customer, potential customer, or other user of our web services (collectively, “you”). This Privacy Policy (“Policy”) describes how Moneta collects, uses, and shares personal information, and your choices regarding this information.

It is important that you understand how we use your information. You should read this page in full, but below are the key highlights:

- If you do not wish for your personal information to be collected, used, or disclosed as described in this Privacy Policy, or you are under 18 years of age, you should stop accessing our Services.
- We collect and use your information in order to provide and improve our Services and your experience, protect the security and integrity of our platform, and meet our legal obligations.
- If you have any questions, please contact us on at [privacy@moneta.global](mailto:privacy@moneta.global)

## Applicability Of This Policy

This Policy applies to our services, which include the services we provide on <https://www.moneta.global/> or any other websites, pages, features, or content we own or operate (collectively, the “Sites”) or when you use any Moneta API or third-party applications relying on such an API, and related services (collectively, the “Services”).

***If you do not agree with the terms of this Policy, do not access or use the Services, Sites, or any other aspect of our business.***

## Types of Information We Collect

We may collect personal information from you when:

Data You Provide to Us	Data We Collect
<ul style="list-style-type: none"><li>• You create an account with us</li><li>• You use our Services</li><li>• You contact us for customer service or other purposes</li><li>• You provide us with user content, ideas, information, user reviews, comments, feedback, or other submissions</li></ul>	<ul style="list-style-type: none"><li>• You visit and interact with our website</li><li>• You create an account with us</li><li>• You view our newsletters or other email communications</li><li>• You interact with Moneta social media</li><li>• You click through a marketing promotion</li></ul>

## Types of Information:

<b>Information Category</b>	<b>Description</b>
Basic Customer Information	Name, Address, Date of birth, Nationality, Country of residence, Gender, Phone number, Email Address
Supplemental Identification Information	Utility bills (for your billing address), Photographs and/or videos, Government-issued identity document, e.g. passport, driver's license, or state identification card, Social security number, Employment information (e.g. company name), Proof of residency
Identity Verification	Biometric information generated based on photos or videos you provide in order for us to verify your identity
Institutional Information (pertains to institutional customers)	Employer Identification number (or comparable number issued by a government), Personal identification information for all material beneficial owners of your business
Financial Information	Bank account number, Tax identification number, Income/net assets/wealth verification statements
Wallet Information	When you attach yourself-custodial wallet to the Sites, or multi-coin crypto wallet, and connect it to your Moneta account, we collect your Wallet address and information
Transaction Information	Information about the transactions made on our Services, such as the the amount, payment method, date, and/or timestamp

We may gather the following data:

- Personal details such as name, address, telephone number, email address, and date of birth.
- Usage patterns and history related to our products and services.
- The blockchain address of your linked self-custodial wallet.
- Any other data you voluntarily provide.

## ***Information Collected Automatically***

<b>Information Category</b>	<b>Description</b>
Browser and device information	<ul style="list-style-type: none"><li>● Information about the device, operating system, and browser you're using</li><li>● Other device characteristics or identifiers (e.g. plugins, the network you connect to)</li><li>● IP address</li></ul>
Product Usage Information	<p><b>Activity information:</b> Information about what you view or click on while visiting our Sites and Apps and how you use our Services</p> <p><b>Diagnostic and Troubleshooting Information:</b> Information about how our Services are performing when you use them, i.e. service-related diagnostic and performance information, including timestamps, crash data, website performance logs, and error messages or reports</p>
Information from cookies and similar technologies	See our <b>Cookies Section</b> below for more information

## ***Information We Obtain from Third Parties***

<b>Information Category</b>	<b>Description</b>
Public Database Information	We obtain information about you from public databases, such as the United Nations Sanctions List, US ITA Consolidated Screening List, and the SEC EDGAR, including your name, address, email address, phone number, gender, national ID number and nationality/country of residence, date of birth, job role, public employment profile, listing on any sanctions lists maintained by public authorities, and other data as necessary
Blockchain Data	We may analyze public blockchain data, including timestamps of transactions or events, transaction IDs, digital signatures, transaction amounts, and wallet addresses

Information from our Marketing and Advertising Partners	We may receive information such as your name and contact information from our marketing partners, including in some instances what marketing content you viewed or the actions you take on our Sites
Information from Analytics Providers	We may receive information about your Site usage, interactions, age group, and survey responses (including prior to account creation, in some cases)

## How We Use Your Information

We use your information in accordance with your instructions, including any applicable terms in the Terms of Service, and as required by applicable law. We may also use the information we collect for:

- **Providing Our Services And Features.** We may use the information we collect to provide, personalize, maintain, and improve our products and Services, including as described in the Terms of Service. This includes using information to:
  - operate, maintain, customize, measure, and improve our Services, and manage our business;
  - create and update users' accounts;
  - process transactions;
  - send information including confirmations, notices, invoices, technical notices, updates, security alerts, and support and administrative messages; and,
  - to create de-identified or aggregated data.
- **Safety And Security.** We may use your information to help maintain the safety, security, and integrity of our Services, including to:
  - protect, investigate, respond to, and deter against fraudulent, unauthorized, or illegal activity;
  - monitor and verify identity or service access;
  - protect against spam, malware, or security risks;
  - perform internal operations necessary to provide our Services, including to troubleshoot software bugs and operational issues;
  - enforce our agreements with third parties, and address violations of our Terms of Service or agreements for other Services; and,
  - comply with applicable laws and regulations.
- **Customer Support.** We may use information we collect to provide customer support, including to:
  - direct questions to the appropriate customer support person;
  - communicate with you, including via social media channels;

- investigate and address user concerns; and,
  - monitor and improve our customer support responses and processes.
- **Research And Development.** We may use the information we collect for testing, research, analysis, and product development to improve your experience, enhance the safety and security of our Services, improve our ability to prevent the use of our Services for illegal or improper purposes, develop new features and products, and facilitate payment solutions in connection with our Services.
- **Legal And Regulatory Compliance.** Many of our Services are subject to laws and regulations requiring us to collect, use, and store your personal information in certain ways. For example, we must identify and verify customers using our Services in order to comply with anti-money laundering and anti-terrorism laws. This includes collection and storage of your photo identification, which is stored by Plaid Inc. We also use third parties to verify your identity by comparing the personal information you provide against third-party databases and public records. When you attempt to link a bank account to your account, we may require you to provide additional information which we may use in collaboration with service providers acting on our behalf to verify your identity or address, and/or to manage risk as required under applicable law. If you do not provide information required by law, we will have to close your account. We may use the information we collect to investigate or address claims or disputes relating to use of our Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.
- **Direct Marketing.** We may use the information we collect to market our Services to you. This may include sending you communications via emails about our Services, features, promotions, surveys, news, updates, and events; managing your participation in these promotions and events; and to deliver targeted marketing. Our marketing will be conducted according to your advertising and marketing preferences and as permitted by applicable law.

## How and Why We Share Your Information

We use your personal information to deliver, personalize, operate, improve, create, and develop our Services, to provide you with a secure, smooth, efficient and customized experience as you use them, and for legal compliance, loss prevention, and anti-fraud purposes.

Your data serves several purposes. These are some key highlights:

- Delivering requested products and services.
- Confirming your identity and countering fraud.
- Tailoring your user experience with our offerings.
- Bolstering our systems' security.
- Refining our services and products.
- Upholding legal and regulatory mandates.

We may share your information in the following circumstances:

- **With Your Consent.** You may let us share personal information with others for any other purposes disclosed to you with your consent.
- **With our Affiliates.** Where appropriate, we may share your information with W3i Software Inc, in the course of conducting business and offering our Services to you. Please be advised that W3i Software Inc and its affiliated companies are separate and distinct legal entities from Moneta Digital LLC. W3i Software Inc. does not have any records for, and cannot respond to record requests, addressed to Moneta Digital LLC.
- **To Comply With Our Legal Obligations.** We may share your information with courts, law enforcement authorities, regulators, attorneys or other parties: (A) to comply with laws and legal obligations; (B) for the establishment, exercise, or defense of a legal or equitable claim; (C) to respond to law enforcement and regulatory requests, including (1) when we are compelled to do so by a subpoena, court order, search or seizure warrant, or similar legal procedure, or (2) for international law enforcement requests, pursuant to a mutual legal assistance treaty (MLAT) or letter rogatory; (D) to comply with one or more forms of “travel rules” that require our transmitting of your information to another financial institution; (E) when we believe in good faith that the disclosure of personal information is necessary to protect the rights, property or safety of our customers, us, or others, including to prevent imminent physical harm or material financial loss; (F) to investigate violations of our Terms of Service or other applicable policies; or (G) to report suspected illegal activity or to assist law enforcement in the investigation of suspected illegal or wrongful activity.
- **With Third-Party Identity Verification Services.** We may share your information with third-party identity verification service providers for the purposes of identity verification, fraud prevention, and denial of service to persons presenting an unacceptable level of money-laundering or terrorism-financing risks. These service providers confirm your identity by comparing the information you provide us to public records and other third-party databases. These providers may create derivative data based on your personal information that they can use in connection with provision of identity verification and fraud prevention services. We do not control these providers’ privacy policies.
  - For example, we use Plaid, Inc. (“Plaid”) for identity verification services to identify and authenticate you when you create or reactivate an account with us. Specifically, Plaid will verify that the selfie you provide matches the photo on your government-issued ID. The information collected during this process may constitute Biometric Data, including facial recognition data and mathematical representations of your facial geometry. We do not sell or share your Biometric Data. To learn more about Plaid’s privacy practices, please visit the [Plaid End User Privacy Policy](#). By submitting your information, you agree to Plaid’s Privacy Policy.
- **With Service Providers.** We may share your information on a confidential basis with service providers who help facilitate business operations such as payment processing, marketing, security, or information technology services. Our contracts require these service providers to only use your information according to our instructions.
- **For Advertising Purposes.** Some U.S. state laws classify service providers engaged in select advertising services as ‘third party businesses’ or ‘independent controllers.’ You have the right to restrict these types of advertising services providers’ use of your personal information. For clarity, Moneta does not ‘sell’ or ‘share’ personal information with these advertising services

for monetary benefit, and they are contractually restricted from using personal information collected by Moneta for their own independent marketing purposes.

- **With Financial Institutions.** We may share your information with financial institutions to process payments you have authorized.
  - For example, we use Plaid to connect your Moneta account with your bank account, verify your bank account, and confirm your bank account balance prior to approving a transaction. Information shared with Plaid is treated by Plaid in accordance with the [Plaid End User Privacy Policy](#). By linking your bank account through Plaid, you consent to Plaid's Privacy Policy.
- **With Our Professional Advisors.** We may share your information with our professional advisors such as accountants, auditors, lawyers, insurers, bankers, and blockchain forensic services in order to complete third-party audits or to comply with our legal obligations.
- **During A Change To Our Business.** If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of our assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities, some or all of your information may be shared or transferred.
- **Aggregated Or De-identified Data.** We may create de-identified or anonymous data from personal information by removing data components (such as your name or email address) that makes the data personally identifiable to you, or through obfuscation. We may share aggregated and/or anonymized data with others for their own uses.

## Consent for Data Usage

We obtain explicit consent from you for the collection and use of this data. We strive to minimize the data we collect, so we do not collect data beyond what is essential for our services and regulatory needs.

## Data Storage

All user data is securely stored within the United States, adhering to relevant data protection regulations.

## Security

We maintain administrative, technical, and physical safeguards designed to protect the personal information we maintain against unauthorized access or disclosure. No system can be completely secure. Therefore, although we take steps to secure your information, we cannot guarantee that your information, searches, or other communication will always remain secure. When registering for our Services, choose a complex password and turn on advanced security features, such as two-factor authentication. Never share your account credentials with third-parties and submit a Customer Support ticket here if you become aware of unauthorized access to or use of your account.

**You are responsible for all activity on the account that is associated with your login credentials.**

## **Cookies and Tracking Technologies**

Unlike many companies, we **do not** use cookies, pixels, web beacons, SDKs, and other tracking technologies to collect information about your browsing activities, your interactions with websites and apps, and to serve tailored ads.

If you have any questions about our use of cookies or other technologies, please submit your request via our Support Portal.

## **International Transfers**

Our Services are directed and offered only to individuals and institutions located in supported regions in the United States. Please note that if you are visiting the Site from outside of the United States, your information may be transferred to, stored, and/or processed in the United States. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. By using any portion of the Site, you acknowledge and consent to the transfer of your information to our facilities in the United States.

## **Data Retention**

We retain your personal information for as long as is necessary for the purposes set out in this Privacy Policy. To determine how long we will retain your personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information, and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

We will retain and use your personal information to the extent necessary to comply with our legal obligations (i.e., if we are required to retain your data or the information you provided to us to comply with applicable laws, including anti-money-laundering, anti-terrorism, or other financial laws and regulations). In addition, we will retain and use your personal information to resolve disputes and enforce our legal agreements and policies.

We will retain your marketing contact information until you unsubscribe from our marketing communications. We will also retain the Services' usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Services, or we are legally obligated to retain this data for longer periods.

We will retain access to Biometric Data as part of customer identification information for the period required by financial laws and regulations. Unless required by a valid warrant or subpoena to maintain any specific Biometric Data for longer, we will securely delete Biometric Data according to this schedule, rendering it no longer available for inspection or access. Our third-party verification service providers will retain your Biometric Data until one of the following events occurs: the identity verification purposes for the collection have been satisfied; or six (6) months from the time of collection.

## User Rights

It is Moneta's policy to offer certain privacy rights to all individuals, regardless of whether a statutory right exists. The rights that Moneta offers to all individuals include the following:

- **Right to Know.** You have the right to request what Personal Data we collect, use, disclose, or share about you, as applicable.
- **Right to Access/Portability.** You can request access to and/or a copy of the personal information that we maintain about you.
- **Right to Delete.** You can ask us to delete the personal information that we have collected or maintain about you, subject to exceptions. Please note that we are required to retain certain personal information to comply with our legal obligations, including compliance with recordkeeping requirements contained in anti-money laundering, anti-terrorism, or other financial laws and regulations.
- **Right to Correct.** You can ask us to correct inaccurate personal information we maintain about you.
  - To request updates or corrections to your personal information, please submit your request via our Support Portal. You can also update certain account profile information by logging into your account.
- **Right to Opt Out.** You can opt out of certain uses of your personal information:
  - **Marketing and Promotional Communications.** If you would like to stop receiving marketing or promotional messages, notifications, or updates, you may do so by following the unsubscribe instructions that appear in these email communications, or you may contact us at [privacy@moneta.global](mailto:privacy@moneta.global) to opt out of direct marketing. Please be advised that you may not be able to opt out of receiving certain service or transactional messages from us, including legal notices.
  - **Targeted Advertising.** Although Moneta **does not** currently conduct Targeted Advertising, you may opt out of targeted advertising (see *Cookies and Tracking Technologies* above).
- **California and Virginia Privacy Rights.** California and Virginia residents have certain legal rights with respect to our collection, use, and sharing of personal information. Please review our ***Notice to California Consumers*** and ***Notice to Virginia Consumers*** for more information about those rights below.

To exert any of these rights, contact us at [privacy@moneta.global](mailto:privacy@moneta.global). To protect your privacy and security, we may request specific information from you to help us verify your identity before

complying with your request. We are not obligated to provide or to delete any information pursuant to your request if we are unable to adequately verify your identity.

We reserve the right to refuse to act on a request, or to charge a reasonable administrative fee when a request is either manifestly unfounded or excessive because of its repetitive character.

## **Children's Privacy**

The Sites and Services are not directed to persons under the age of 18, and we do not knowingly request or collect any information about persons under the age of 18. If you are under the age of 18, please do not provide any personal information through the Sites or Services. If a User or Customer submitting personal information is suspected of being younger than 18 years of age, Moneta will require the relevant Customer or User to close his or her account, and will take steps to delete the individual's information as soon as possible.

## **Changes to the Privacy Policy**

We may revise this policy occasionally as we update or expand our Services and to comply with applicable laws. If we make any changes, we will change the 'Updated' date above. If we make material changes, we will notify users via our primary platform and/or via email. We encourage you to review and revisit this Policy to stay informed.

## **Links to Other Sites**

While our platform may link to external sites, our influence does not extend to their content or privacy measures. We thus cannot guarantee the safety of any data shared on these external platforms. Always peruse the privacy policies of sites you access.

## **Details on Data Breaches**

Should a data breach occur, our policy mandates the notification of affected users and relevant bodies within 72 hours when possible, except when it's unlikely to pose a threat to your rights.

## **Protecting Your Information**

To counter unauthorized data breaches, we've implemented stringent security measures, both digital and physical. Regular audits of our data storage, processing, and security protocols are carried out to maintain robust defenses.

## Notice To California Consumers

The California Consumer Privacy Act, as amended by the California Privacy Rights Act or “CPRA” (collectively, the “CCPA”), creates additional privacy obligations for businesses and provides Californians with additional privacy rights.

Please note that the CCPA limits these rights by, for example, prohibiting us from providing certain sensitive information in response to an access request and limiting the circumstances in which we must comply with a deletion request. Additionally, the CCPA does not apply to the Personal Information of consumers who initiate or complete the process of applying for financial products or services, because this information is subject to the federal Gramm-Leach-Bliley Act (GLBA) and implementing regulations, or the California Financial Information Privacy Act (CalFIPA). For additional information relating to your choices about this information specifically, see the **GLBA Disclosure** section below.

### ***Additional Privacy Rights for California Consumers***

In addition to the rights granted above, if you are a California resident, you have the right to:

- **Information.** For details about the personal information we have collected over the last 12 months, including the categories of sources, please see the Types of Information We Collect section above. We collect this information for the business and commercial purposes described in the How We Use Your Information section above. We share this information with the categories of third parties described in the How and Why We Share Your Information section above.
- **Opt out of the “sale” or “share” of your personal information.** Moneta does not “sell” or “share” your personal information for monetary benefit, and advertising partners are contractually restricted from using personal information collected by Moneta.io for their own independent marketing purposes. You may opt out of such advertising cookies that may be classified as a “sale” or “share” under CA law as detailed in the Cookies and Tracking Technologies section (above).
- **Limit the Use and Disclosure of Your Sensitive Personal Information.** Moneta only collects that sensitive personal information which is necessary for us to provide our Services. As such, limiting our use of your sensitive personal information would result in us not being able to provide our Services.

In addition to the mechanisms above, you can also exercise these rights by emailing us at [privacy@moneta.global](mailto:privacy@moneta.global). California residents may also empower an “authorized agent” to submit requests on their behalf. We will require the authorized agent to have a written authorization confirming that authority.

### **Business Designation**

Under the CCPA, Moneta operates as a Business on behalf of our users.

## Notice to Virginia Consumers

The Virginia Consumer Data Protection Act (“VCDPA”) creates additional privacy obligations for businesses and provides Virginians with additional privacy rights.

### ***Additional Privacy Rights for Virginia Consumers***

In addition to the rights granted above, if you are a Virginia resident, you have the right to:

- **Opt out of the “sale” of your personal data.** Moneta does not “sell” personal data as defined by the VCDPA.
- **Opt out of targeted advertising.** Some of the third-party cookies placed on our website may be used for targeted advertising on other websites. You may opt-out of such cookies as detailed in the Cookies and Tracking Technologies section (above) or by emailing [privacy@moneta.global](mailto:privacy@moneta.global).
- **Opt out of profiling.** Moneta does not profile you as defined by the VCDPA.
- **Opt in to the use of Sensitive Data.** Moneta only collects that sensitive personal information which is necessary for us to provide our Services. As such, limiting our use of your sensitive personal information would result in us not being able to provide our Services.

In addition to the mechanisms above, you can also exercise these rights by emailing us at [privacy@moneta.global](mailto:privacy@moneta.global).

### **Controller Designation**

Under the VCDPA, Moneta operates as a Controller on behalf of our users.

## GLBA Disclosure

The Gramm-Leach-Bliley Act (“GLBA”) requires financial institutions to explain their information-sharing practices to their customers and to provide the customer the ability to opt out of certain disclosures of their personal information. In addition, the GLBA prescribes certain safeguards for sensitive data held by financial institutions. You can review our GLBA Consumer Privacy Notice [here](#).

### **Administrative:**

- Provision of Privacy Policy: Our Privacy Policy is readily available on our platform and is provided to customers upon account creation.
- Collection & Disclosure of Nonpublic PII: We gather various nonpublic PII, which may occasionally be shared with third-party facilitators like credit bureaus and fraud detection agencies. However, account number disclosures to third parties are strictly prohibited.
- Protecting PII: Comprehensive safeguards, spanning physical, digital, and procedural realms, ensure the sanctity of our customers' data. Our workforce is well-acquainted with the gravity of maintaining this confidentiality.

- Treatment with 3rd Party Service Providers: Any third-party associates are contractually obligated to protect our users' data and can use it solely for the intended purpose. They are prohibited from leveraging this data for unrelated ventures.

Our unwavering dedication to your privacy underpins our continuous efforts in fortifying our data protection measures. Should you have queries regarding this policy, kindly contact us at [privacy@moneta.global](mailto:privacy@moneta.global)