

Policy regarding the Processing of Personal Data

(together with the Cookie Policy)

1. General Provisions

1.1. This Policy regarding the Processing of Personal Data (hereinafter referred to as the "Policy") has been developed by "Chain Bridge" Limited Liability Company (hereinafter referred to as the "Holder") in compliance with the requirements of the Digital Code of the Kyrgyz Republic dated July 31, 2025, No. 178 (hereinafter referred to as the "Digital Code") to ensure the protection of human and civil rights and freedoms during the processing of personal data, including the protection of the right to privacy, personal, and family secrets.

1.2. This Policy applies to all personal data processed directly by the Holder or a Processor regarding: i) users; ii) clients; iii) their beneficial owners and legal representatives; iv) contractors; v) employees; vi) candidates for vacant positions (specialties); vii) other entities having a business relationship with the Holder or intending to establish one; and viii) entities otherwise interacting with the Holder, if such interaction results in the Holder receiving their personal data.

1.3. The Policy applies to relations in the field of personal data processing that arose with the Holder both before and after the approval of this Policy. Furthermore, the Policy applies to any operations with personal data carried out by the Holder, whether in automated mode or without the use of automation tools.

1.4. The Policy is published by the Holder for free access on its official website on the Internet: <https://chain-bridge.org/>. Personal data subjects are informed about the collection, processing, and possible transfer of their personal data through their review and acceptance of this Policy.

1.5. For the purposes of this Policy, the Holder uses the following basic concepts:

- **Personal information (personal data)** – recorded information on a tangible medium about a specific person, identified with a specific person or which can be identified with a specific person, allowing for the identification of that person directly or indirectly, by reference to one or more factors specific to their biological, economic, cultural, civil, or social identity;
- **Personal data information system** – a set of personal data contained in databases and the information technologies and technical means that ensure their processing;
- **Collection of personal data** – the procedure for obtaining personal data by the holder (owner) of a personal data array from the subjects of this data or from other sources in accordance with the legislation of the Kyrgyz Republic;
- **Processing of personal data** – any operation or set of operations performed independently of the methods by the holder (owner) of personal data or on their behalf, by automatic means or otherwise, for the purpose of collecting, recording, storing, updating, grouping, blocking, erasing, and destroying personal data;
- **Consent of the personal data subject** – a free, specific, unconditional, and informed expression of will by a person, expressed in the form provided by this Law, according to

which the subject notifies their consent to the implementation of procedures related to the processing of their personal data;

- **Transfer of personal data** – the provision of personal data by the holder (owner) to third parties in accordance with the Digital Code and international treaties;
- **Cross-border transfer of personal data** – the transfer of personal data by the holder (owner) to holders under the jurisdiction of other states;
- **Personal data confidentiality regime** – normatively established rules determining restrictions on access, transfer, provision, and storage conditions of personal data;
- **Updating of personal data** – the prompt introduction of changes to personal data in accordance with the procedures established by the current legislation of the Kyrgyz Republic;
- **Blocking of personal data** – the temporary suspension of the transfer, clarification, use, and destruction of personal data;
- **Destruction (erasure or demolition) of personal data** – actions by the holder (owner) of personal data to bring these data into a state that does not allow for the restoration of their content;
- **Holder (owner) of the personal data array** – "Chain Bridge" Limited Liability Company, address: 70 Suvanberdiev St., Bishkek, Kyrgyz Republic, operating on the basis of license No. 121, series 0135 BA, dated September 13, 2024, issued by the Service for Regulation and Supervision of the Financial Market under the Ministry of Economy and Commerce of the Kyrgyz Republic;
- **Processor** – a legal entity determined by the Holder that processes personal data based on a contract concluded with them;
- **Platform** – an audiovisual (frontend) and software (backend) set of information that provides Clients with the opportunity to:
 - a. view information on prices and other terms of operations (transactions) with Virtual Assets through the use of various software and hardware tools (e.g., personal computers, smartphones, etc.);
 - b. conduct transactions with Virtual Assets (acquisition, alienation, exchange) as provided by the Holder's license. The Platform is the intellectual property of the Holder or the Holder's counterparties and is hosted on the Internet under the single domain name "chain-bridge," belonging to the Holder, at: <https://chain-bridge.org/>. Furthermore, in the context of this Policy, the Platform shall be understood as any mobile or desktop (i.e., intended for a personal computer) **application** that ensures the conclusion and (or) execution of this Agreement.

Other concepts used in this Policy, the meaning of which is not disclosed in this paragraph, are used in the sense assigned to them by the current legislation of the Kyrgyz Republic and (or) the internal documents of the Holder.

1.6. Basic Rights and Obligations of the Holder.

1.6.1. The Holder has the right:

1. to determine, at its own discretion, the scope and list of measures necessary and sufficient to ensure the fulfillment of the obligations imposed on the Holder by the norms of the Digital Code and the regulatory legal acts adopted in pursuance of the Digital Code, unless otherwise provided by the Digital Code;
2. to entrust, on the basis of a contract, the processing of personal data to a third party — the Processor, provided that the Processor ensures the necessary conditions for the protection of personal data from unauthorized or accidental access, alteration, blocking,

copying, provision, or distribution, as well as from other unlawful actions regarding the personal data;

3. in the event that a personal data subject withdraws their consent to the processing of personal data, to continue processing the personal data without the subject's consent if there are grounds specified in the Digital Code and provisions adopted in pursuance of the Digital Code.

1.6.2. The Holder is obliged:

- a. to organize the processing of personal data in accordance with the requirements of the Digital Code;
- b. to respond to appeals and requests from personal data subjects and (or) their authorized representatives in accordance with the requirements of the Digital Code and the internal documents of the Holder within a period not exceeding 7 (seven) days from the moment the appeal or request is submitted;
- c. to ensure the updating of personal data: i) in cases provided for by the legislation of the Kyrgyz Republic, including legislation on combating the financing of terrorist activities and (or) the legalization (laundering) of criminal proceeds (hereinafter — "AML/CFT"), and ii) upon the initiative of the personal data subject whose personal data is subject to change.

1.7. Basic Rights of the Personal Data Subject

1.7.1. The personal data subject has the right:

1. to receive information regarding the processing of personal data belonging to the subject, except in cases provided for by the Digital Code. Upon request received from the personal data subject, the Holder shall provide the requested information in an accessible form; the information provided must not contain personal data relating to other personal data subjects, except in cases where there are legal grounds for the disclosure of such personal data. The list of information regarding the processing of a specific subject's personal data and the procedure for obtaining it are established by the Digital Code;
2. to demand that the operator clarify their personal data, block, or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained, or not necessary for the stated purpose of processing, and to take measures provided for by the Digital Code to protect their rights;
3. to appeal, in accordance with the procedure established by law, the unlawful actions or omissions of the Holder during the processing of personal data belonging to the subject.

1.7.2. The personal data subject is obliged:

1. to provide the Holder with exclusively accurate and up-to-date personal data;
2. to submit documents to the Holder reflecting certain personal data to the extent necessary for the Holder to achieve the purposes of their processing;
3. to promptly notify the Holder of the clarification (update, change) of personal data belonging to such subject.

1.8. The person responsible for organizing the processing of personal data at the Holder's office, including responsibility for this Policy (hereinafter — the Responsible Person), its

compliance with the current legislation of the Kyrgyz Republic, and the implementation of any provisions of this Policy, shall be appointed by the sole executive body of the Holder.

2. Categories of Personal Data Subjects, Scope and Categories of Processed Personal Data

2.1. The Holder processes personal data belonging to the subjects mentioned in clause 1.2 of this Policy.

2.2. The Holder collects personal data about the subject to be processed through: i) receiving personal data directly from its owner (the personal data subject), ii) automatic collection, and iii) receiving personal data about the subject from authorized representatives.

2.3. Personal data collected through submission by the personal data subject or an authorized representative includes: surname; first name; patronymic (if any); citizenship; gender; age; date and place of birth; number of the primary identity document; information on the date of issue of said document and the issuing authority; registered residential address; actual residential address; military duty status (military registration data, data from a military ID card (if any), etc.); driver's license data; personal identification number (taxpayer number); data on registration with extra-budgetary (pension, social) funds; phone number; email address; information on the presence or absence of a criminal record; information on income, expenses, assets, and property-related liabilities, as well as any other information regarding sources of wealth; information on open bank accounts, bank cards, electronic money wallets, and (or) virtual asset wallets (identifiers); information on the conduct of entrepreneurial and (or) other economic activities, including, but not limited to, participation in the charter and (or) share capital of a legal entity; information on employment activities, employer, and salary amount; information on the position held, family composition, and close associates; personal signature; information on client operations (transactions) on the Platform; records of negotiations between users/clients and the Holder, including through contact with the technical service (support service).

Personal data collected in an automated mode includes: IP address; geolocation; identifier, device type, and operating system name ("Windows", "Android", "iOS", etc.); advertising identifier; browser information (name and version); authentication data (security codes, links, testing (such as "reCAPTCHA"), etc.); cookie data, browser data (browsing history), demographic data, interests, and consumer preferences.

2.4. The processing of special categories of personal data directly or indirectly concerning racial and (or) ethnic origin, political views, religious or philosophical beliefs, health status, or intimate life is carried out by the Holder in strict accordance with the provisions of the Digital Code and other regulatory legal acts effective in the Kyrgyz Republic (if any). Specifically, the Holder is entitled to process health data of its employees, as well as biometric data (e.g., a personal photograph and (or) other audiovisual image of the subject) and data on ethnic origin specified in the identity documents of citizens interacting with the Holder within established (or to be established) civil law (business) or labor relations.

2.5. When requesting personal data from a subject, the Holder is guided by the requirements of regulatory legal acts and (or) the Holder's internal documents that determine the minimum necessary scope (list) of personal data for such a subject, based on the subject's status (profile) (user, client, employee, etc.), the processing purposes defined by the Holder, and other legally

significant circumstances (for instance, including, but not limited to, the risk level assigned to a client in accordance with the risk-based approach applied by the Holder within AML/CFT procedures).

2.6. Categories of personal data and categories of personal data subjects may be revised by the Holder at any time, provided that: i) the changes are mandatory recorded in this Policy, and ii) the personal data subjects are notified via any available method (e.g., through the application on the Platform, a push notification in the app, or an email message).

3. Cookie Policy

3.1. For the purposes of i) ensuring the proper functioning of the Platform, ii) improving the quality, simplifying, and (or) otherwise modifying the services provided by the Holder through the Platform, and iii) organizing and conducting promotional activities, the Holder is entitled to use cookies, which are text files stored in the browsers of personal data subjects (typically in the browsers of users or clients, their beneficial owners, and (or) legal representatives).

3.2. The Holder is entitled to use the following types of cookies:

- **Strictly Necessary:** Required for the correct functioning of the Platform;
- **Performance (Analytical):** Allow the Holder to read visit history and identify the most and least popular pages and sections of the Platform;
- **Functional:** Enable navigation between sections of the Platform and allow for its configuration (personalization);
- **Targeting (Advertising):** Set on the Platform by the Holder's counterparties performing advertising functions;
- **Social Media Cookies:** Set by various social media services added to the Platform by the Holder.

4. Purposes of Personal Data Collection and Processing

4.1. The processing of personal data is limited to achieving specific, predetermined, and legitimate purposes. Processing of personal data that is incompatible with the purposes of personal data collection is not permitted.

4.2. Only personal data that meets the purposes of its processing shall be subject to processing.

4.3. The Holder processes personal data for the following purposes:

- Conducting due diligence or enhanced due diligence of the personal data subject by the Holder and (or) third parties on behalf of the Holder, including for the purposes of identification and (or) verification, as well as performing other actions within the scope of verification activities;
- The Holder making a decision to establish or refuse to establish business relations with a personal data subject or the person represented by the subject as a result of due diligence or enhanced due diligence;
- Making a decision to conclude an employment contract with a candidate for a vacant position at the Holder's office;

- The conclusion, execution, and termination of civil law contracts, employment contracts, agreements, and other legally binding documents;
- The organization by the Holder of proper or enhanced monitoring of business relations established with a subject or a person represented by the subject;
- Execution of banking operations;
- Compliance with labor legislation within the framework of employment and other directly related relations, including for the purposes of: assisting employees in employment, obtaining education, attracting, selecting, and training candidates for employment with the Holder, ensuring the personal safety of employees, monitoring the quantity and quality of work performed by employees, compensating expenses related to the temporary disability of the Holder's employees, ensuring the safety of property, maintaining personnel and accounting records and office management, filling out and submitting reports in prescribed forms to authorized bodies, and organizing employee records in mandatory pension and social insurance systems;
- Maintaining internal organizational records, including archival records;
- Compliance with requirements (adherence to prohibitions) established in the regulatory legal acts constituting the law of the Kyrgyz Republic, including, but not limited to, the calculation and payment of income tax as well as contributions to extra-budgetary funds;
- Ensuring information security (cybersecurity);
- Ensuring the proper functioning of the Platform;
- Improving the quality, simplifying, and (or) otherwise modifying the services provided by the Holder;
- Organizing and conducting promotional activities.

5. Legal Grounds for Personal Data Processing

5.1. The legal basis for the processing of personal data is the set of regulatory legal acts in pursuance of which and in accordance with which the Holder carries out the processing of personal data, including:

- The Constitution of the Kyrgyz Republic;
- The Labor Code of the Kyrgyz Republic dated August 4, 2004, No. 106;
- The Civil Code of the Kyrgyz Republic dated May 8, 1996, No. 15;
- The Tax Code of the Kyrgyz Republic dated January 18, 2022, No. 3;
- The Digital Code of the Kyrgyz Republic dated July 31, 2025, No. 178;
- The Law of the Kyrgyz Republic "On Universal Military Duty of Citizens of the Kyrgyz Republic, on Military and Alternative Services" dated February 9, 2009, No. 43;
- The Law of the Kyrgyz Republic "On Virtual Assets" dated January 21, 2022, No. 12;
- The Law of the Kyrgyz Republic "On Countering the Financing of Criminal Activity and Legalization (Laundering) of Criminal Proceeds" dated August 6, 2018, No. 87;
- The "Regulation on the Activities of a Virtual Asset Exchange Operator and the Maintenance of the Register of Virtual Asset Exchange Operators," approved by Resolution of the Cabinet of Ministers of the Kyrgyz Republic "On Matters of Regulating Relations Arising during the Turnover of Virtual Assets" dated September 16, 2022, No. 514;
- The "Regulation on the Procedure for Suspending an Operation (Transaction), Freezing and Unfreezing an Operation (Transaction) and (or) Funds, Providing Access to Frozen Funds, and Managing Frozen Funds," approved by Resolution of the Cabinet of Ministers of the Kyrgyz Republic "On Measures to Implement the Law of the Kyrgyz

Republic 'On Countering the Financing of Criminal Activity and Legalization (Laundering) of Criminal Proceeds'" dated November 14, 2025, No. 739;

- The "Regulation on the Procedure for Conducting Customer Due Diligence," approved by Resolution of the Cabinet of Ministers of the Kyrgyz Republic "On Measures to Implement the Law of the Kyrgyz Republic 'On Countering the Financing of Criminal Activity and Legalization (Laundering) of Criminal Proceeds'" dated November 14, 2025, No. 739;
- The "Typical Criteria for High and Low Risks," approved by Order of the State Financial Intelligence Service of the Kyrgyz Republic under the Ministry of Finance of the Kyrgyz Republic dated December 24, 2020, No. 61/p.

5.2. Furthermore, the legal grounds for processing personal data include:

- The Holder's Charter;
- Contracts concluded between the Holder and personal data subjects;
- Consents of the subjects to the processing of their personal data.

6. Procedure and Conditions for Personal Data Processing

6.1. The processing of personal data is carried out by the Holder in accordance with the requirements of the Digital Code and the regulatory legal acts adopted in pursuance of the Digital Code.

6.2. The processing of personal data is carried out with the consent of the personal data subjects to the processing of their personal data, as well as without such consent in cases provided for by the Law on Personal Data.

6.3. The Holder processes personal data using the following methods:

- Non-automated processing of personal data;
- Automated processing of personal data;

6.4. Only employees of the Holder whose job responsibilities include the processing of personal data are permitted to process such data.

6.5. The Holder shall not disclose personal data to third parties or distribute such data without the consent of the personal data subject, unless otherwise provided for by the Digital Code. Consent to the processing of personal data authorized for processing shall be executed separately from other documents (contracts, agreements, etc.), even if this requirement is not stipulated by the Digital Code or the regulatory legal acts adopted in pursuance of the Digital Code.

6.6. Any transfer of personal data, including to investigative and inquiry bodies, as well as to other authorized state bodies and (or) organizations, is carried out by the Holder in accordance with the requirements of the Digital Code.

6.7. The Holder declares that the cross-border transfer of personal data is carried out with the prior consent of the personal data subjects, in particular, including but not limited to, for the purposes of conducting due diligence or enhanced due diligence of potential and (or) current

clients, their beneficial owners, and (or) legal representatives. Furthermore, the Holder is entitled to transfer the personal data of subjects to other persons — for example, to persons whose advertising cookies the Holder uses on the Platform.

6.8. The Holder ensures the application of necessary legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, alteration, blocking, and (or) distribution, and other unauthorized actions. Additionally, for the purpose of protecting personal data from unauthorized access, the Holder uses SSL certificates on the Platform, as well as the HTTPS security extension to the HTTP protocol, to enhance the security of the data stored on the Platform.

6.9. The Holder stores personal data no longer than required by each purpose of personal data processing, unless the period during which the storage of specific personal data is permitted is explicitly established by the current legislation of the Kyrgyz Republic.

6.10. The Holder ceases the processing of personal data in the following cases:

- A fact of unlawful processing of personal data is identified (in this case, the Holder shall immediately cease processing and destroy the personal data upon identification of the fact of unlawful processing);
- The purpose of the personal data processing has been achieved;
- The period of validity has expired or the consent of the personal data subject to the processing of said data has been withdrawn, provided that under the Digital Code, the processing of such personal data is permitted only with the subject's consent.

6.11. Other conditions for the processing of personal data not specified in Section 5 of this Policy shall be applied in accordance with the Digital Code.

7. Updating, Correcting, and Destroying Personal Data.

Responses to Requests from Personal Data Subjects

7.1. The Holder shall update the subject's personal data in accordance with subparagraph "c" of paragraph 1.6.2 of this Policy.

7.2. If a personal data subject identifies inaccuracies in their personal data or contests the lawfulness of the Holder's actions regarding the personal data belonging to that subject, the subject is entitled in such cases to demand that the Holder block the personal data being processed. The blocking and unblocking of personal data shall be carried out in accordance with the provisions of the Digital Code.

7.3. Within two weeks following the expiration of the personal data storage period and (or) the achievement of the purposes of its collection and processing, the Holder shall destroy the personal data under the conditions established by the Digital Code.

7.4. In response to a request from a personal data subject or an authorized representative, the Holder shall, within 7 (seven) days from the date the request is submitted, notify the requester of the presence or absence of personal data relating to the subject, the legal grounds and purposes for processing the subject's personal data, and provide other information permitted for

disclosure under the provisions of the Digital Code, provided the need for such disclosure is specified in the request received by the Holder.

A request addressed to the Holder must contain:

- The number of the primary identity document of the personal data subject or the authorized representative, the date of issue of said document, and the issuing authority;
- Information confirming the participation of the personal data subject in relations with the Holder (for example, the contract number and date of conclusion), or information otherwise confirming the fact of personal data processing by the Holder;
- The signature of the personal data subject or their authorized representative if the request is submitted to the Holder in writing. Furthermore, if an authorized representative signs the request, a copy of the power of attorney granting the representative the right to act on behalf of the personal data subject must be attached.

7.5. The Holder hereby gives notice through this Policy that the right of a personal data subject to access their personal data may be restricted in cases established by the Digital Code.

8. Final Provisions

8.1. Relations concerning the collection and processing of personal data that are not reflected in the text of this Policy shall be regulated by the Holder based on the provisions of the Digital Code.

8.2. The Holder, at its own discretion, shall exercise its right to update this Policy. The current version of this Policy is subject to mandatory publication on the Platform and enters into force at the moment it is made available for free access to an indefinite circle of persons.