
PRIVACY POLICY

Effective Date: April 16th, 2024

SCOPE

This Privacy Policy (“Policy”) describes how Agora Blue Ltd., together with its affiliates, parents, and subsidiaries, treats personal information on our websites where the Policy is located (the “Platform”).

TYPES OF INFORMATION WE COLLECT

We collect information from you and about you. Here are some examples of the information we, or our vendors on our behalf, may collect:

- **Contact Information.** For example, we may collect your name, mailing address, telephone number and email address. We may also collect your mobile phone number.
 - **Information You Submit.** We may collect information when you send us a message through the “Contact Us” page or similar features on our Platform.
 - **KYC Information.** To the extent that we are required to collect personal information from you under financial laws or regulations, our vendor will collect information required for “Know Your Customer” compliance.
 - **Financial Account Information.** For example, we may collect your bank account and routing number.
 - **Business Information.** For example, we may collect information about your title, employer, and business contact information.
 - **Account Information.** Certain portions of the Platform allow you to create a user account. In connection with that account, we may collect your username and password.
 - **Location Information.** We may collect information relating to your general location based on your IP address.
 - **Device Information.** For example, we may collect the type of device you use to access our Platform. We may also collect your device identifier, IP address or operating system.
 - **Other Information.** If you use our website, we may collect information about the browser you are using. We might look at what site you came from, or what site you visit when you leave us.
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HOW WE COLLECT YOUR INFORMATION

We collect your information in different ways. Below are some examples of how we may collect your information.

- **Directly From You.** For example, when you register for an account, engage in a transaction on the Platform, or submit an inquiry to us.

- **Passively.** For example, when you visit and navigate our Platform on any device. We may also collect information about users over time and across different websites and devices when you use the Platform.
 - **From Third Parties.** We may receive information about you from other sources. For example, this may include receiving information from our business partners, including analytics vendors. This may also include vendors that perform services on our behalf, such as our KYC vendor.
 - **By Combining Information.** For example, we may combine information that we collect offline with information we collect through our Platform. We may also combine information we collect about you from the different devices you use to access our Platform.
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HOW WE USE YOUR INFORMATION

Examples of how we may use your information include:

- **To Run and Improve Our Platform and Business.** We may use your information to make our Platform and business better. We may also use your information to provide you with information about our business. We will also use your information to facilitate transactions on the Platform.
 - **To Respond to Your Requests or Questions.** This may include responding to your feedback.
 - **To Communicate With You.** We may communicate with you about your account or our relationship. We may also contact you about this Policy or our Platform terms and conditions.
 - **For Marketing Purposes.** We may provide you with information about our company and our business initiatives. For more information about your choices related to these communications, see the Choices section below.
 - **For Security Purposes.** This could include protecting our company and consumers who use our products and services. It may also include protecting our Platform.
 - **As Otherwise Permitted By Law or As We May Notify You.**
 - **As Requested or Directed By You.**
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HOW WE SHARE YOUR INFORMATION

We may share your information in the following ways:

- **Internally.** We may share your information with our parent, subsidiary, and affiliate entities.
- **With Our Service Providers.** We may share your information with third parties who perform services on our behalf. For example, this may include companies that send emails on our behalf or help us run our Platform.
- **With Any Successors to All or Part of Our Business.** For example, if we merge with, are acquired by, or sell part of our business to another entity. This may include an asset sale, corporate reorganization or other change of control.
- **To Comply With the Law or To Protect Ourselves.** For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or

investigatory body requests. We might share information when we are investigating a potential fraud.

- **For Other Reasons We May Describe to You.**
 - **As Requested or Directed By You.**
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CHILDREN UNDER 13

The Platform where this Policy is located is meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 13, and strive to comply with the provisions of any applicable law. If you are a parent or legal guardian and think your child under 13 has provided us with information, please contact us at privacy@agora.finance. You can also write to us at the address listed at the end of this website Policy.

CHOICES REGARDING YOUR INFORMATION

You have certain choices about how we use your information. Certain choices you make are browser and device specific.

Marketing Communications:

You can opt out of receiving our marketing communications. Note that you will still receive transactional messages from us, including information about your account and responses to your inquiries.

Cookies & Other Tracking Technologies:

- **Cookies:** You can adjust your browser to control cookies to require your affirmative acceptance for new cookies, automatically reject cookies and/or delete or disable existing cookies. How you do so depends on the type of cookie and the browser that you are using. For more information on how to control browser cookies, [click here](#). If information about your browser is not available through this page, please search your browser for instructions about how to opt-out of cookie collection.
- **Google Analytics:** We may use Google Analytics on our Platform to help us understand how you use our Platform. You can learn about how to opt-out of Google Analytics [here](#).
- **Email Tools:** You can also change your email settings to block the automatic download of images in email messages, as such images may contain technologies that help us understand how you interact with the message.
- Note that deleting or blocking cookies may impact your experience on our website, as some features may not be available. Certain options you select are browser and device specific.

Our Do Not Track Policy:

- **Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.** If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.
- Options you select are browser and device specific.

Your Privacy Rights

Depending on your state or country of residence, you may have certain privacy rights under applicable law.

- You can request:
 - Further details about the personal information we collect about you;
 - Access to, rectification of, or deletion of certain personal information; or
 - That we stop sharing or using your personal information in certain circumstances.
 - If you would like to exercise your privacy rights, please contact us at privacy@agora.finance.
 - Note that we may take steps to verify your identity before processing your request. Where required by law, we may accept a privacy request from someone acting on your behalf; however, we may still contact you to verify that this individual is authorized to make the request for you.
 - We strive to process privacy requests in compliance with applicable law. However, in some circumstances, we may not be legally required, or able, to comply with your request.
 - You can file a complaint with a local data protection authority or regulator regarding our processing of your personal information. That stated, if you have concerns or complaints, please let us know so we can work to address the issue.
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SECURITY

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. We use reasonable physical, technical, and organizational means to help safeguard personal information under our control.

Personal Information may be accessed by persons within our organization, or our third-party service providers, who require such access to carry out the purposes described in this Policy, or otherwise permitted or required by applicable law.

STORAGE OF INFORMATION

Information we maintain may be stored in or outside of the British Virgin Islands. You understand and agree that we may transfer your personal information outside of the country where you live. This Platform is subject to the laws of the British Virgin Islands, which may not provide the same level of protections as those in your own country. Personal information processed and stored in another country, including the the British Virgin Islands, may be subject to disclosure or access requests by the governments, courts or law enforcement or regulatory agencies in that country according to its laws.

By using our Platform or by providing us with personal information, you consent to any such transfer of information outside of your country.

LINKS

Our Platform may contain links to other third-party sites that are not governed by this Policy. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible for the privacy practices used by third-party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third-party sites.

HOW TO CONTACT US

If you have any questions, comments or concerns with respect to our privacy practices or this Policy, or wish to update your information, please feel free to contact us at privacy@agora.finance.

CHANGES IN POLICY

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platform. Please check our Platform periodically for updates. Your continued access to and/or use of our Platform after any such changes constitutes your acceptance of, and agreement to this Privacy Policy, as revised.