



EMBD CapCo Ltd. Privacy and Cookies Policy

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Last Updated: September 2025

Protecting your private information is our priority. This Privacy and Cookies Policy (“Policy”) applies to EMBD CapCo Ltd. (“EMBD”, “we”, “us”, “our”), and our website(s), token offering pages, marketing materials, platform services, and any products and other services we may provide (collectively, the “Services”). This Policy governs our data collection, use, and disclosure practices regarding personally identifiable and non-personally identifiable information we may collect from or about you in connection with the Services. By accessing or using the Services, you consent to the data practices described in this Policy.

1. What Information Do We Collect and How Do We Collect It?

We may collect the following categories of information from you:

- **Device Information:** When you visit our Services, we may automatically collect certain information about your device, including your web browser, IP address, time zone, and certain cookies installed on your device. We may also collect information about the web pages you view, how you arrived at our site, and your interactions with the Services.
- **Personal Information:** To provide you with the Services, we may collect personally identifiable information, such as your name, email address, mailing address, phone number, blockchain wallet address, transaction history, and other details necessary for processing transactions or providing support.
- **Financial and Transaction Information:** When you participate in token subscriptions or related activities, we may collect payment-related data. Payments are primarily settled in stablecoins (USDC, USDT). In some cases, fiat settlement may be accepted at our discretion. Transactions are processed through third-party digital wallet services, and by using our Services you agree to their terms of service and privacy policies.

2. Cookies and Tracking Technologies

We use cookies and similar tracking technologies (such as log files, tags, and pixels) to recognize your browser or device, understand how you use the Platform, and improve your experience.

Cookies may be used for the following purposes:

- Session management and authentication
- Remembering your preferences and settings
- Security and fraud prevention
- Analyzing traffic and usage patterns



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- Delivering relevant advertising and marketing

You can control or disable cookies through your browser settings. Please note that disabling cookies may affect the functionality of certain features of the Platform. For more information about cookies, including how to manage or delete them, please visit www.allaboutcookies.org.

We do not alter our data collection practices in response to “Do Not Track” signals from browsers, as there is no consistent industry standard for such signals.

3. How We Use Your Information

We use your personal and non-personal information to:

- Operate and deliver the Services
- Process token subscriptions, redemptions, and transactions
- Improve and personalize the Services
- Communicate with you regarding your use of the Services
- Monitor activity to detect fraud and ensure compliance
- Comply with legal and regulatory obligations
- Provide marketing updates or promotions (if you have opted in)
- Understand usage trends and user needs

4. How and Why We Share Information with Third Parties

We do not sell your personal information. However, we may share information with trusted service providers and partners to support our operations, including transaction processing, analytics, compliance, and customer support. These parties are required to maintain confidentiality and may only use your information for agreed purposes.

We may also disclose your information if required by law, to protect our legal rights, or in response to lawful requests from regulators or authorities.

5. International Data Transfers

Your information may be processed or stored in jurisdictions outside of your home country. By using our Services, you consent to the transfer of your data to jurisdictions that may have different data protection laws. We will ensure appropriate safeguards are in place to protect your data.

6. Data Retention

We retain your personal information for as long as necessary to provide the Services, comply with legal obligations, resolve disputes, and enforce agreements. Once retention periods expire, your information will be securely deleted.



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7. Your Rights

- Depending on your jurisdiction, you may have rights to:
 - Access and obtain a copy of your personal information
 - Correct or update inaccurate information
 - Request deletion of your personal information
 - Object to or restrict certain processing activities
 - Withdraw consent for marketing communications
 - Request portability of your information in a structured format

To exercise these rights, please contact us Using “Talk to Us” feature on our website <https://embd.finance/>

8. Security of Your Information

We take reasonable administrative, technical, and physical measures to protect your information against unauthorized access, loss, or misuse. However, no system is completely secure, and we cannot guarantee absolute security.

9. Changes to this Policy

We may update this Policy from time to time. Updated versions will be posted on our website with a revised 'Last Updated' date. We encourage you to review this Policy periodically.

10. Contact Information

- If you have any questions or concerns about this Policy or our data practices, please contact us at:

EMBD CapCo Ltd.
2nd Floor, Ellen L. Skelton Building
Fishers Lane, Road Town, Tortola, BVI VG 1110
Contact us: Using “Talk to Us” feature on our website <https://embd.finance/>