

PRIVACY POLICY

Tylt (“Tylt”) is an ecosystem centered around an online platform for transferring and transacting in Digital Assets. Tylt provides users with a payments platform to send, receive, and conduct payments in Digital Assets, along with an integrated custody solution for securely storing Digital Assets. Our ecosystem includes various services to facilitate seamless digital payments and related activities.

Tylt is committed to safeguarding your privacy and the information you provide while using our website (“Platform”). We greatly value the trust you place in us and adhere to the highest security standards to protect your information (referred to as “Your Information”).

This Privacy Policy forms an integral part of the Terms of Use on the Tylt platform. By incorporating this Privacy Policy, it becomes an essential component of the Terms of Use. The terms “You,” “Your,” “User,” and “Subscriber” in this Privacy Policy will have the same contextual meaning unless defined otherwise.

Tylt recognizes the significance of your trust, which is why we prioritize secure communication and customer information privacy. To understand our information-gathering and dissemination practices, please read the following statement. Kindly note that this Privacy Policy is subject to change at any time without notice. We recommend reviewing this policy periodically to stay informed about any updates.

1. Information We Collect

We may collect personal information when you create an account, use our services, or interact with our platform. Personal information refers to data collected that can uniquely identify or contact you. The scope of personal information, as mentioned in this Privacy Policy, includes but is not limited to:

- Your name and address
- Your email and contact/other contact information
- Your date of birth and gender
- Your financial records
- Information regarding your transactions on the platform (including transaction history)
- Your financial information, such as bank account information or credit card or debit card or UPI or other payment instrument details
- IP address
- Any other additional elements of “Sensitive Personal Data or Information” or “Personal Information”
- Identification code of your communication device used to access the Platform.
- Any other information provided during your registration process, if applicable, on the Platform

We use this non-personal information for various purposes, including monitoring and improving the functionality and performance of our platform, customizing your experience, and analyzing trends and preferences among our users. Additionally, we may use this information for cybersecurity purposes, such as to detect and prevent unauthorized access or suspicious activity on our platform. Please note that this non-personal information does not identify you personally and is not considered personal information. As such, we may use and disclose this information for any purpose, provided it is in compliance with applicable laws and regulations.

For the purposes of collecting some of the information mentioned above, we may use tracking tools on our platform, including browser cookies and web beacons.

2. Non-Personal Information

Non-Personal Information refers to data that does not specifically identify an individual and cannot be used to contact, locate, or identify a person. This information may include but is not limited to:

- Information related to the type of device you use to access the platform, such as device model, operating system, browser type, and screen resolution

- Data regarding your interactions with the platform, such as the pages visited, actions taken, and the duration and frequency of your visits
- Information collected through cookies, pixel tags, and other tracking technologies to enhance user experience, understand user preferences, and analyse website traffic
- Data that has been compiled and grouped to provide general insights and trends without identifying any specific individual
- General data related to age, gender, geographic location, or other attributes that do not directly identify you
- Data that has been stripped of any personal identifiers, rendering it impossible to associate with a specific individual

3. Purpose of Collection and Use of Information

The data we gather on the platform will be utilized to operate and enhance the platform, ensure a smooth experience, facilitate transactions between users, analyse user behaviour and preferences, and for other legitimate business purposes of Tylt.

- Tylt will never sell your data to third parties; we will only share your data with third parties if we have your consent or if it is required by law.
- Tylt requests that you refrain from providing any personal information, personally identifiable information, or sensitive personal information unless explicitly requested by Tylt during the registration or other relevant process. Tylt does not collect any personal information unless you provide it to us voluntarily.
- Tylt reserves the right, at its sole discretion, to delete or remove any information that you have provided or uploaded if Tylt finds that such information violates the terms of this Privacy Policy. Tylt will not be liable to you for any such deletion or removal.
- Tylt will comply with all applicable laws in relation to the collection, use, and disclosure of personal information.

You agree that Tylt may contact you and deliver information or targeted advertisements, administrative notices, and any other communication relevant to your use of the platform. This includes communication sent to you even if you are registered on a Do Not Disturb (DND) list.

Tylt may use your personal information to contact you for a variety of reasons, such as:

- To provide you with information about our products and services
- To send targeted advertisements
- To send administrative notices
- To communicate with you about other information relevant to your use of the platform

You may opt out of receiving marketing communications from Tylt at any time by clicking the “Unsubscribe” link at the bottom of any marketing email.

4. Data Storage

User data is securely stored on a cloud platform to ensure efficient processing and high levels of security. Our storage practices are designed to protect personal information and maintain its confidentiality and integrity. Detailed information about data storage and security measures will be outlined in our Terms and Conditions of use.

5. Security and Safeguards

Tylt is committed to protecting your personal information and ensuring your data's security in compliance with applicable global laws and regulations. Our Privacy Policy and security controls are designed to meet or exceed the standards set forth by various data protection laws worldwide, including but not limited to the General Data Protection Regulation (GDPR) in the European Union and other relevant data protection regulations across different jurisdictions.

Tylt employs comprehensive security measures and protocols to safeguard your data and ensure the confidentiality, integrity, and availability of your information. These measures include, but are not limited to, encryption, access controls, intrusion detection systems, and regular security audits. Our security practices are

continuously reviewed and updated to align with the latest industry standards and regulatory requirements to prevent unauthorized access, misuse, alteration, or disclosure of your personal and non-personal data.

While we strive to implement robust security measures, it is important to note that no system can be completely secure. Therefore, we cannot guarantee the absolute security of the information you provide to Tylt, and we are not liable for any unauthorized access, disclosure, alteration, or destruction of your information despite our security measures.

We also encourage you to take appropriate physical, managerial, and technical safeguards on your end to maintain the security and integrity of your data while using our platform. This includes regularly updating passwords, using secure networks, and being vigilant about unauthorized access.

Tylt is committed to fostering a culture of security and privacy awareness among its employees by providing regular training on data protection, security practices, and privacy policies.

6. Your Consent

You have the option to withdraw your consent to the collection and use of your personal data at any time. To do so, please contact the grievance officer at [email].

Please note that if you withdraw your consent, certain services or features may no longer be available to you.

If you believe that there are any inaccuracies in your personal data, you can request to correct them, and we will take necessary and reasonable steps to rectify any inaccuracies upon your request.

Under certain circumstances, you have the right to request the deletion/erasure of your personal data, particularly if it is no longer necessary for the purpose for which it was collected. Tylt will comply with such requests unless there are legal or regulatory reasons that require us to retain your data.

In the event of any changes to our privacy policy, we will inform you accordingly. If you do not agree to the updated policy, you have the right to withdraw your consent and close your account.

7. Data Retention and Deletion

Tylt will retain your information for the duration necessary to fulfill the purposes stated in this privacy policy or as required by applicable laws. Your information will only be used in accordance with this privacy policy.

In certain circumstances, Tylt may retain your information to prevent fraud or abuse, to exercise our legal rights, defend against legal claims, or as required by law. Once the retention period of your personal information expires, Tylt will actively delete or destroy such personal information from Tylt systems.

The duration for which Tylt will retain your personal information will be determined based on the specific purpose for its collection. In certain cases, Tylt may need to retain your personal information for an extended period to prevent fraud or abuse.

Tylt may retain your personal information to defend against legal claims. This may include retaining your personal information for a period of time after a legal claim has been filed against Tylt.

Tylt may be required to retain your personal information by law. This may include retaining your personal information for a period of time after it is no longer needed for the original purpose for which it was collected.

Once the retention period of your personal information expires, Tylt will actively delete or destroy such personal information from Tylt systems. This may include deleting or destroying the physical copies of your personal information and removing it from Tylt's electronic systems.

8. Link to Other Websites

Tylt may provide links to third-party websites for your convenience and information. Please be aware that these websites are operated independently of Tylt, and we do not control their content or privacy practices. When you click on a link to an external website, you will be directed away from the Tylt website, and your interactions will be governed by the privacy policy and terms of service of the respective website. We encourage you to review the privacy policies of any third-party websites you visit, as Tylt is not responsible for the privacy practices or content of these external sites

9. Disclosure Regarding the Security Of Bank Details

We take the security of your bank details seriously and have implemented measures to protect your personal and financial information. Our payment processing partners are compliant with the Payment Card Industry Data Security Standard (PCI DSS), which is a set of security standards designed to ensure that all companies that accept, process, store, or transmit credit card information maintain a secure environment.

However, there is always a risk of unauthorized access, use, or disclosure of your personal and financial information. We recommend that you protect your account information, use two-factor authentication (2FA) when accessing your account, and regularly monitor your account for any unauthorized activity. If you suspect any unauthorized activity, please contact us immediately.

By making an investment, you acknowledge and accept the risks associated with the security of your bank details and personal information. Our company is not liable for any losses incurred due to unauthorized access, use, or disclosure of your personal and financial information.

10. Your Rights and Choices

We obtain your consent before collecting and processing your personal information, and we only use your information for the purposes outlined in this privacy policy. We provide you with the right to access, correct, and delete your data, as well as the right to object to processing and data portability. You can opt out of receiving marketing communications from us at any time.

If you would like to exercise any of these rights, or if you have questions or concerns about your personal information, please contact us using the contact information provided at the end of this policy. We will respond to your request as soon as reasonably possible, and in any event, within the timeframes required by applicable law.

If you request the deletion of your personal information, we may not be able to provide you with the services you have requested or may be required by law to retain certain information.

You have choices about the types of marketing communications you receive from us. You may opt out of receiving marketing emails by following the instructions in the email or by contacting us using the contact information provided at the end of this policy. We may still need to send you certain transactional or administrative messages related to your account or the services we provide, even if you have opted out of marketing communications.

You have the right to:

- request that we provide you with a copy of the personal information we hold about you, and request that we transmit that information to another controller, where technically feasible;
- withdraw your consent to the processing of your personal information at any time. Withdrawing your consent may not affect the lawfulness of any processing we have conducted based on your consent before its withdrawal;
- lodge a complaint with a supervisory authority if you believe that we have violated your rights or applicable law.

We may need to verify your identity before responding to any request or inquiry related to your personal information.

11. Third-Party Sharing

Tylt does not sell or share your personal information with third parties for their marketing purposes. However, we may share your personal information with third parties in the following circumstances:

- With your explicit consent, which you may revoke at any time
- When required by law or in response to a valid request from a governmental authority
- To protect the rights, property, or safety of Tylt, its users, or the public

We may share aggregated or anonymized data that does not identify you personally with third parties for various purposes, including research, analysis, and marketing.

12. Children's Privacy

Tylt is not intended for use by children under the age of 13. We do not knowingly collect personal information from children under the age of 13. If you are under 13, do not use or provide any information on this platform. If we learn that we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.

If you believe that we might have any information from or about a child under 13, please contact us at support@tylt.money

13. To Improve the Service

Tylt may share your information with third parties, including our group/affiliate entities, service providers, and business partners, to provide you with the requested services and enhance your overall experience on the platform. These third parties are bound by confidentiality obligations and are not permitted to use your information for any other purposes.

Access to your personal information will be provided to certain employees of Tylt strictly on a need-to-know basis to ensure the proper functioning of the platform and to deliver the requested services. Employees with access to your personal information are bound by confidentiality agreements and are trained to handle data securely and confidentially. Tylt will take every precaution to protect your personal information and limit access to authorized personnel only.

Tylt may share your information in compliance with legal requirements, court orders, or to protect our rights, safety, or the rights and safety of others. Additionally, in the event of a merger, acquisition, or sale of assets, your information may be transferred to the acquiring entity or new owners.

Tylt will not sell, rent, or lease your personal information to third parties for their marketing purposes without your explicit consent. However, aggregated and anonymized data may be shared with third parties for analytical and research purposes.

While Tylt takes necessary precautions to safeguard your information, we cannot guarantee the security of information shared over the internet or through electronic means. There is always a risk that your personal information could be intercepted or compromised, and you acknowledge this risk when using the platform.

Though Tylt has implemented measures to secure the personal information collected, it is important to acknowledge that the open nature of the internet exposes such information to potential access by unauthorized entities, software, or codes (referred to as "Hackers"). Tylt disclaims all liability for any unauthorized access to information by Hackers.

14. Global Standards Adherence

This Privacy Policy has been formulated in accordance with the prevailing regulations and laws of the India. We are committed to upholding the highest standards of data protection and privacy for our users. In addition to complying with Indian laws, we recognize the importance of adhering to global privacy standards.

For residents of the European Union (EU), our practices align with the General Data Protection Regulation (GDPR), which establishes stringent guidelines for the processing and protection of personal data. For residents of the United States of America (USA), we adhere to the standards set forth by the California Consumer Privacy Act (CCPA) and other relevant regulations applicable to data privacy in the United States. For residents of UAE, we adhere to Constitution of the UAE (Federal Law 1 of 1971) Crimes and Penalties Law (Federal Law 31 of 2021, abrogating Federal Law 3 of 1987) Federal Decree Law No. 34 of 2021 on Combatting Rumors and Cybercrimes and other relevant regulations applicable to data privacy applicable in the region.

By utilizing our services, users from different regions implicitly consent to the terms outlined in this Privacy Policy, acknowledging the specific provisions tailored to their respective jurisdictions. We are committed to continually monitoring and updating our practices to ensure ongoing compliance with evolving global privacy standards.

15. Exclusive Rights under GDPR

For more detailed information about your rights under the GDPR, please refer to our GDPR Privacy Policy. These policies provide comprehensive insights into how we collect, use, and protect your personal information, as well as the specific rights available to you under each regulation.

16. Changes to This Policy

Tylt reserves the right to amend this Privacy Policy from time to time as required or in response to changes in relevant laws. If Tylt decides to make any changes to this Privacy Policy, we will post those changes on this page

so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. However, any substantial changes to this Privacy Policy will be communicated to you through our website or via email as provided on the website and/or app.

17. Grievances

If you have any grievances about our Privacy Policy, you may contact our Grievance Officer from Monday to Saturday (10:00 AM to 06:00 PM) at the following:

Email: support@tylt.money

For any additional terms and conditions not specifically outlined here, please refer to our General Terms of Use, which apply to all services provided by TYLT

GDPR Privacy Policy

At Tylt, we are committed to safeguarding your Personal Data in accordance with the General Data Protection Regulation (GDPR). We may process Personal Data under the following conditions:

- Consent: Your consent has been given for processing Personal Data for one or more specific purposes.
- Performance of a Contract: Provision of Personal Data is necessary for the performance of an agreement with you and/or for any pre-contractual obligations thereof.
- Legal Obligations: Processing Personal Data is necessary for compliance with a legal obligation to which Tylt is subject.
- Vital Interests: Processing Personal Data is necessary to protect your vital interests or those of another natural person.
- Public Interests: Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in Tylt.
- Legitimate Interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by Tylt.

In any case, Tylt will gladly help to clarify the specific legal basis that applies to the processing, and in particular, whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

Tylt is committed to respecting the confidentiality of your Personal Data and ensuring that you can exercise your rights. If you are within the EU, you have the following rights under this Privacy Policy and by law:

- Request Access to Your Personal Data: You have the right to access, update, or delete the information we have on you. Whenever possible, you can access, update, or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. This also enables you to receive a copy of the Personal Data we hold about you.
- Request Correction of Your Personal Data: You have the right to have any incomplete or inaccurate information we hold about you corrected.
- Object to Processing of Your Personal Data: This right exists where we are relying on a legitimate interest as the legal basis for our processing, and there is something about your particular situation that makes you want to object to our processing of your Personal Data on this ground. You also have the right to object where we are processing your Personal Data for direct marketing purposes.
- Request Erasure of Your Personal Data: You have the right to ask us to delete or remove Personal Data when there is no good reason for us to continue processing it.
- Request the Transfer of Your Personal Data: We will provide to you, or to a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw Your Consent: You have the right to withdraw your consent to using your Personal Data. If you withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the service.

Exercising Your GDPR Data Protection Rights

You may exercise your rights of access, rectification, cancellation, and opposition by contacting us. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will do our best to respond to you as soon as possible.

You also have the right to lodge a complaint with a Data Protection Authority about our collection and use of your Personal Data. For more information, if you are in the European Economic Area (EEA), please contact your local data protection authority in the EEA.

For any additional terms and conditions not specifically outlined here, please refer to our General Terms of Use, which apply to all services provided by TYLT