

PRIVACY STATEMENT

Purpose of this privacy statement is to provide information on processing activities performed by Ronin Apps B.V. (hereafter: Ronin) regarding your personal data. It is of utmost importance to Ronin that your personal data is processed in an adequate way.

Unless otherwise stated this privacy statement applies to our O.C.E.A.N. platform, Ronin One app and website. By creating an account in our app, you agree to the conditions of this privacy statement and the processing of your personal data.

Ronin reserves the right to change this privacy statement unilaterally. We advise you to regularly check the privacy statement. If we make a substantial change to our privacy statement, we will inform you by posting a message on our website and Ronin One app and if needed request for your consent in order to process your personal data.

Finally, this privacy statement does not apply to any job applicants and employees of Ronin.

TYPES OF PERSONAL DATA WE COLLECT

We process your personal data when you use our services and products.

The following personal data can be processed by us (not exhaustive):

- Contact details (name and surname, address, phone number and e-mail address)
- Copy of your identification document with a shielded social security number (Dutch citizens can provide a copy of the passport, ID-card and/or drivers license. EEA citizens can provide a copy of the passport and/or ID-card. Citizens from outside the EEA can provide a copy of the passport)
- Transaction details
- IP-address
- Correspondence

You are not required to provide Ronin the personal data that we request, but if you choose not to do so, we may not be able to provide you with our products or services, or with a high quality of service or respond to any queries you may have.

BASIS AND PURPOSES OF PROCESSING YOUR PERSONAL DATA

The basis and purposes for which we process personal data are described below.

Legal obligation

If Ronin is legally required to process your personal data we will process your personal data. Ronin can process your personal data for the following purposes on the basis of a legal obligation:

- Law or regulations may oblige us to process your personal data i.e. identification and verification of your identity.

Contract performance

Ronin will process your personal data if necessary for performing the contract between Ronin and the client. Ronin can process your personal data for the following purposes on the basis of contract performance:

- When you use the Ronin One app you need to create an account. The personal data processed by creating the account is stored so you can make use of the services of Ronin i.e. performing/processing a transaction.
- When you require Ronin to provide your personal data to you or a third party on your request (right of information or right of data portability).
- When you contact Ronin and processing is necessary for carrying out our services.
- Handling of questions and/or complaints with regard to the performing of the contract.
- Information about changes in our services or products regarding the performing of the contract.

Legitimate interests

Ronin also has the right to process your personal data if we have a legitimate interest in doing so. In that case we must be able to demonstrate that our interest in using your personal data outweighs your right to data protection. We therefore balance all interests. Ronin can process because of the following purposes on the basis of legitimate interest:

- We process your personal data for combatting and investigating fraud.
- When we approach you for a client satisfaction survey, you are free to participate. When you participate in the survey, we process the personal data you provide. We pseudonymize the personal data after completing the survey.
- If you write a review about Ronin on an online platform and your personal data is visible, then in principle we will process your personal data for the quality of the services provided by Ronin. The data will be used for improving our services.
- We process personal data in case we need to defend against legal claims.
- We process personal data for the purpose of general customer contact, for answering questions and handling complaints;

Consent

If we process your personal data for purposes other than the above-mentioned purposes, we will ask you for your consent prior to processing unless the processing is necessary for the processing of our agreement or we may or must do so based on provisions of law.



You have the right to withdraw the requested permission at any time. This withdrawal does not interfere with the legality of the processing on the basis of the permission before the withdrawal.

Ronin can process personal data due to the following purposes on the basis of your given consent:

- Sending newsletters of Ronin.
- Sending invitations of Ronin gatherings.
- If you participate in a contest of Ronin, we will process your personal data in order to contact you regarding the outcome of the contest.

AUTOMATED INDIVIDUAL DECISION MAKING

Ronin does not make decisions that may have legal consequences for you or affect you to a (significant) degree, based on an automated process of individual decision making. These decisions are taken by computer programs or systems, without interference of an individual.

If, at any time in the future, we would like to use automated individual decision making that has legal consequences for you or affect you to a (significant) degree, we will inform you beforehand.

WHO HAS ACCESS TO YOUR PERSONAL DATA?

Within Ronin your personal data can be accessed only by authorized individuals. All are bound by a duty of confidentiality and are only authorized to the extent necessary to perform their tasks.

Your personal data may be transferred to other parties if we are required to do so by law, if we have to perform an agreement with you, if we have a legitimate interest or because we engage another service provider. In all other cases, we will only provide your personal data to third parties with your prior consent.

We engage other parties that process personal data on behalf of Ronin. Before such parties are engaged, we must first ensure that they are reliable. Companies that process your personal data on our behalf assigned a data processing agreement to ensure the same level of security and confidentiality of your personal data according to the instructions provided by us and the applicable legislation. Ronin remains responsible for the processing activities of companies which process personal data on our behalf

We do not transfer your personal data to any country outside the EEA or international organisation.

PROTECTION AND STORAGE OF YOUR PERSONAL DATA

Ronin takes the protection of your personal data seriously and takes appropriate technical and organizational measures to prevent misuse, (accidental) loss, unauthorized access and unwanted disclosure. If you have the impression that your data is not properly secured or there are indicators of abuse, please contact us via compliance@ronin.id.

We include the following security measures (not exhaustive):

- We follow a three-step process to establish your identity.
- Transferring your personal data on request is encrypted.
- Access control in systems using passwords.

We do not keep your personal data longer than necessary to maintain our relationship and to fulfill the purposes for which we collected the personal data or the purposes for which the personal data are reused. We will comply with the retention periods specified in applicable laws and regulations or if no provision is stated we will determine the period in line with GDPR provisions.

Some personal data will be retained for 7 years following the termination of the relevant contract, because Ronin has a legal obligation to do so. Some personal data must be retained for a longer period of time for example if the regulator asks us to keep specific data for longer in the context of risk models. In some cases, we retain for a shorter period than 7 years. For example, transaction details will be retained for 5 years in general. Finally, we keep your personal data for direct marketing until you withdraw your consent and/or you object to this processing.

YOUR RIGHTS AS A DATA SUBJECT

You have the right of access, rectification and erasure of your personal data. You also have the right to withdraw your consent to data processing, to object to the processing of your personal data and the right of restriction of processing your personal data.

Finally, you have the right to data portability (only applicable if the GDPR applies to the processing of your personal data). Transferability means that you can submit a request to Ronin to send the personal information we have in a computer file to you or another organization requested by you. We advise you to check the privacy statement of the party to whom we need to provide the personal data and when we need to send the information to you make sure that your own equipment has proper safeguards to protect your data from third party interception.

If you would like to exercise your rights or submit a complaint, please contact us via compliance@ronin.id. We aim to respond to your request as quickly as possible, but within 4



weeks at the latest. When you contact us to exercise your right to ask for an overview of your personal data we have collected we ask you to send a redacted copy of your identity document with the request. We ask you to cover your photo and your social security number if shown to protect your privacy. Please be aware that your social security number can be shown on the numerical machine strip of your passport.

If you do not agree with our processing, we would like to address the possibility of submitting a complaint to the national supervisory authority, the Dutch Data Protection Authority. This can be done via the following link: <https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-us>.

CONTACTDETAILS RONIN

Ronin can be designated as controller, as referred to in the General Data Protection Regulation (GDPR), for the processing of your personal data.

If you have any questions and/or comments regarding our privacy statement please contact us via the contact details below.

Address

Ronin Apps B.V.
Attn: Compliance Department
Prinses Margrietplantsoen 33
2595 AM Den Haag
The Netherlands

Email: compliance@ronin.id