

# Privacy Policy

Version: 1.0 Draft. Effective date: [insert date].

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Important legal note: this document is a drafting template prepared from business instructions. It must be reviewed by counsel admitted in the Sultanate of Oman before publication, especially for virtual asset, escrow, consumer, AML/CFT, arbitration and personal data requirements.

## 2. Privacy Policy

### 2.1. Data collected

DevBay may collect account data, name, email, phone, country, IP address, device identifiers, wallet address, KYC/KYB data, company documents, transaction history, chats, files, calls, screen-sharing recordings, ratings, reviews and Platform technical logs.

Calls and screen-sharing sessions are recorded and stored for 3 months unless a longer period is required for a dispute, AML/KYC, security, tax, investigation or protection of DevBay rights.

Files uploaded within a transaction are stored for 6 months unless a longer period is required for a dispute, AML/KYC, security, investigation or protection of DevBay rights.

### 2.2. Purposes and legal basis

Data is processed for registration, identification, KYC/KYB, AML/CFT, escrow processing, communications, dispute resolution, security, fraud prevention, analytics, support, legal compliance and protection of rights.

The User consents to data processing by registering, accepting the Terms, creating a transaction, uploading files, participating in calls or continuing to use the Platform.

If a User provides third-party data, the User represents that they have a lawful basis and consent of those persons.

### **2.3. Sharing and processors**

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DevBay may share data with hosting, KYC/KYB, AML/wallet screening, analytics, email, video communication, file storage, security providers, legal and financial advisers, arbitrators, experts, law enforcement and regulators.

Data may be processed in Oman and other countries. The User consents to cross-border data transfers to the extent necessary for Platform operation.

### **2.4. User rights**

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A User may request access, correction, deletion or restriction of personal data unless this conflicts with AML/KYC, tax, dispute, evidentiary, security or other lawful retention grounds.

DevBay may refuse deletion or restriction where data is necessary for compliance, fraud prevention, protection of rights or applicable law.