

# PRIVACY POLICY

Last updated: August 7<sup>th</sup>, 2025

**INGRASE Ltd** (trading name «**Paykilla**») is committed to protecting your privacy, providing clear information about how your **Personal data** is processed and complying with data protection law when dealing with your **Personal data**. This **Privacy Policy** (hereinafter “**Policy**”) sets out how we collect and use your **Personal data**. Please read this **Privacy Policy** carefully. By using this website in the future and/or registering to use the **Company's Services**, you confirm that you have studied, understood, accepted and agreed to comply with this **Privacy Policy**.

**Company** – means **INGRASE Ltd**. (reg. number 245602), established and acting under the Law of the Republic of Seychelles also referred to in these Policy as “Paykilla”, “we” and “us”.

**Personal data** - is any information which is related to an identified or identifiable natural person.

**Service-s** – meaning services provided on the **Paykilla** platform, including but not limited to transfers and processing of crypto assets.

We process your **Personal data** in an appropriate and lawful manner, in accordance with the Applicable Laws as may be amended from time to time.

## 1. Introduction

For the purposes of data protection law, we act as the «data controller» in respect of the **Personal data** that we process meaning that we solely determine what data collected and the purposes and means of data processing. If you have any questions about how we collect, store or use your **Personal data**, or you would like to update the data we hold about you, you may contact us by emailing at [info@paykilla.com](mailto:info@paykilla.com)

This **Policy** defines the procedure for processing **Personal data** by **Paykilla** and the measures it takes to ensure the security of such data in order to protect and respect your privacy while using the website <https://paykilla.com> and/or the **Company's Services**. The **Policy** applies to all the data that the **Company** can receive from you. The current **Policy** does not control and is not responsible for third-party sites to which you can click on links available on the Site. This **Policy** tells you what personal data we collect, why we need it and how we use. It applies to all visitors of our website in addition to our prospective and existing customers and third-party suppliers.

## 2. How the personal data is collected?

**Personal data** is collected from you during the registration or our KYB/KYC procedures, while you are using our **Services**, during direct or automatic interactions with the **Company**.

**Personal data** is provided to us by you or collected by us from the open sources or through third parties when it is necessary for the **Services** provision.

The **Company** collects and stores **Personal data** in order to comply with the requirements of current legislation, in particular, related to combating and preventing the money laundering, improving and developing the **Company's Services**, studying your requirements, compiling Website statistics, planning and implementing various marketing activities. **Personal data** protection is important to the **Company** and is being provided.

### 3. What personal data do we collect?

**Full name and contact details** - this includes your email address, number or Telegram handle.

**Wallet address** - means a public address on the respective blockchain network associated with the relevant Wallet. It constitutes a random set of symbols assigned by the respective blockchain network. It is used for the payouts/transfers and etc.

**Company information** - this includes beneficiaries, name, address, registration number and other necessary information.

**Your position within the company you represent** - this includes data about your position or title within the company you represent, such as a director, manager, etc. We collect this data if you represent the company, entering into the Business Relationship with us. This may include data about the name of the company or project you represent, etc.

**AML/KYC Personal data** includes the following due diligence/KYC data and documentation about you:

- copy of I.D. card or passport
- proof of residence (e.g. utility bill)
- KYC database checks
- fraud database checks and
- any other documentation or data which we may require, from time to time.

**Automatically collected Personal data** as you visit the website may include:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time);
- products and services you viewed or searched for; Page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number; and
- interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

Regarding the collection of **Cookies** you may find out more in the Companies [Cookie Policy](#).

Company reserves the right to request additional data outside this list if necessary.

#### 4. What do we use your **Personal data** for?

We will use **Personal data**:

- for you to be able to use our **Services** and to create an account with us;
- to notify you about changes to our **Services**.

The legal basis for processing the **Personal data** is our legitimate interest in operating our business. We will also use this data to comply with our legal obligations, e.g. where we are obliged to disclose data under orders from courts and regulators. Then our legal basis for processing the personal data will be compliance with a legal obligation.

- to notify you of special offers or to carry out market research.

The legal basis for processing the **Personal data** is our legitimate interests in keeping you informed about our **Services** that may be of interest to you. If you do not want us to use your data in this way you can contact us and cancel the update subscription.

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your device;
- to allow you to participate in interactive features of our **Service**, when you choose to do so; As part of our efforts to keep our site safe and secure; and
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

The legal basis for processing the **Personal data** is our legitimate interest in administering and improving our website and its features, and keeping our website secure.

You can opt out of providing us some of the **Personal data** but if you do so fully and won't provide the necessary for the use of our **Services Personal data** and **Personal data** requested by law we may not be able to provide you with, or have to cancel a **Service** and, in some cases, it can cause termination of **Services**.

#### 5. Who we share your **Personal data** with:

We do not sell or rent out your data. However, we may share your **Personal data** in accordance with this **Policy**, applicable legislation, or with your consent, in each case for the purposes of and if it is reasonably necessary:

- to provide you with access to the **Services** and performance of our undertakings with you;
- to enter into and perform the Business Relationship with you or the company you represent;
- for compliance with the applicable laws and regulations; or
- for our legitimate interest to maintain, improve and develop the **Service**.

Please note that if we share any portion of your personal data with third persons, we will endeavor to secure such transfer using appropriate legal, organizational, and technical measures.

We share the **Personal data** with the third parties, where necessary, to be precise:

- to our staff, agents and contractors;
- to our professional advisors;
- to our business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and
- to our analytics and search engine providers that assist us in the improvement and optimisation of our **site**.

We may also share your **Personal data** with third parties such as regulatory authorities, or where we are under a legal obligation to disclose your data (for example where we are required to share data in accordance with legislation, to prevent fraud and other criminal offences, or because of a court order). We may disclose your **Personal data** in order to enforce our legal rights or to protect our legal rights or those of a third party.

## 6. How long do we keep your Personal data?

We keep your data only for as long as is reasonably necessary for the purposes for which we process your **Personal data**. These purposes are listed at section 4 of this **Policy**.

**Personal data** – 5 years;

**Personal data** used for the account creation – until termination;

**Automatically obtained information** – 180 days.

All the other information is kept by the **Company** according to the legal requirements. We may process certain personal data longer than outlined below, if it is necessary:

1. to meet our legal obligations under the applicable law;
2. in relation to anticipated or pending legal proceedings; or
3. to protect our rights and legitimate interests or those of third parties.

## 7. What can you do?

You have certain rights under data protection legislation in relation to the **Personal data**. These rights apply only in particular circumstances and are subject to certain exemptions such as public interest (for example the prevention of crime).

These might include:

- the right to access your **Personal data**;
- the right to rectification of your **Personal data**;
- the right to erasure of your **Personal data**;
- the right to restrict or object to the processing of your **Personal data**;
- the right to data portability;

Where the justification for processing is based on your consent, the right to withdraw such consent is available to you at any time.

## 8. Changes to these Policy

We reserve the right to amend or revise this **Policy** in the future, particularly where we need to take into account and cater for any

- business developments and/or
- legal or regulatory developments to applicable law.

Any changes to this **Policy** will be posted on this page and, where appropriate, you will be notified by e-mail. We therefore encourage you to review our **Policy** when you visit the website from time to time to stay informed of how we are using your **Personal data**.