

## MIROCANA PRIVACY POLICY

### INTRODUCTION

At Mirocana Company 9367-1840 Québec inc. and at each of our affiliates (collectively, "Mirocana"), we are committed to maintaining the accuracy, confidentiality and security of your personal information. We take all reasonable steps to ensure that this information is safe and secure, including putting in place rigorous policies and procedures to fully comply with all privacy laws and regulations. Mirocana's privacy policy may be updated in the future if there are any changes to the regulatory framework.

### WHO DOES THE MIROCANA PRIVACY POLICY APPLY TO?

All customers and token holders of Mirocana, and its subsidiaries, affiliates or associated companies.

### WHAT IS PERSONAL INFORMATION?

For the purposes of this Privacy Policy, Personal Information is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities (hereinafter: "Personal Information").

### WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect and maintain different types of Personal Information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number and email address;
- product and service related information concerning the products and services that we provide to, or receive from, you; and
- any other information described in this Privacy Policy.

Mirocana's operations include activities related to the provision services of mathematical modelling of stock markets, currency exchanges and the like with the purpose of proving reasonable predictions of identification of market trends for trading. As such, Mirocana may also collect Personal Information from individuals participating in and / or impacted by those activities.

### WHY DO WE COLLECT PERSONAL INFORMATION?

Mirocana collects Personal Information to enable us to manage, maintain, and develop our operations, including for example:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;
- to be able to review the products and services that we provide to you so that we may understand your requirements for our products and services and so that we may work to improve our products and services;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to enable us to undertake our environmental, health and safety activities, including incident planning, response and investigation;
- to protect us against error, fraud, theft and damage to our goods and property;

- to enable us to comply with applicable law or regulatory process (for example, we may collect Personal Information to satisfy the obligations imposed on us by our various regulators including AML/KYC regulations);
- for the purposes stated in this Privacy Policy; and
- any other reasonable purpose to which you consent.

#### HOW WILL MIROCANA COLLECT PERSONAL INFORMATION?

We will generally endeavor to collect Personal Information directly from you through a number of ways.

Personal Information for our customers may include, but is not limited to name, e-mail address, mailing address, phone number, payment information, date of birth, telephone numbers, location information, digital wallets information, country of residence, and any recorded communications.

Mirocana may collect network data about you, your devices, and your use of those devices within our products or services.

Mirocana may also obtain and collect your Personal Information through the means of requesting identification verification by prompting you to provide us with a photo ID of all individuals to ensure compliance with KYC and AML regulations. Mirocana may be required under applicable laws and regulations to verify government issued photo ID and to record certain information, including name, date of birth, address, principal occupation, type of ID, and ID reference number, before conducting certain types of transactions that may be considered suspicious or stand out of ordinary types of transactions performed by a customer or a token holder.

We may also collect information from third parties, brokers, traders, funds, agencies or other companies and affiliates, to fulfill any special offers or customer requests, manage credit or other business risks; collect outstanding debt; or detect, prevent, manage, suppress, or investigate financial abuse, fraud or other unauthorized or illegal activity.

We may also collect personal and account information about you to evaluate your eligibility for other Mirocana products and services.

We may also collect personal information about you for other purposes from time-to-time, or as permitted or required by law. We will always identify any additional purpose prior to or at the time of collection.

#### HOW DOES MIROCANA COLLECT INFORMATION ABOUT ME, OR OBTAIN MY CONSENT TO USE OR DISCLOSE THAT INFORMATION?

Mirocana collects information about you primarily from you, but from time to time we may also collect information about you from third parties. For example, we may collect information about from credit reporting agencies, those who you have authorized to disclose your information to us, government agencies, or publicly available information or other public sources.

Your consent to the collection, use, or disclosure of your personal information may be implied or express.

We may obtain your express consent to the collection, use, and disclose your information in one of the following ways:

- in writing; or
- by electronic confirmation via the internet; or

- verbally, where an audio recording of the consent is retained by us; or
- through other methods, as long as a record of your consent is created by you, by us, or by a third party acting on Mirocana's behalf.

The choice to provide Mirocana with your consent to the collection, use, and disclosure of your personal and account information is always yours, however, your decision to withhold such consent may limit our ability to provide you with certain products, services, or offers.

#### DOES MIROCANA USE COOKIES, WEB BEACONS, OR OTHER WEB TECHNOLOGIES TO COLLECT INFORMATION?

Yes, but we limit the types of technologies and the information such technologies will collect about you.

For example, we may use your IP address to help diagnose problems with our server, to administer our websites, and to gather broad, aggregated demographic information about you. We may also store your IP address when you submit a transaction for validation and to protect against fraud. Our websites may use cookies to deliver content specific to your interests, to save your password, to find your account information in our database when you access a service so you do not need to log in at every visit.

#### WHAT CAN MIROCANA DO WITH MY ACCOUNT AND PERSONAL INFORMATION?

Mirocana uses your personal and account information to fulfill the purpose for which it was collected.

We will disclose information about you to upon an official request by a national or international government agency and upon a subpoena by a court of law, and to parties collecting outstanding debt upon a subpoena by a court of law.

Your personal and account information may also be shared with other Mirocana' companies or affiliates, in order for them to assess your eligibility for their products or services; to directly provide you offers about their products or services; to confirm or authenticate your identity and ensure they have your correct and up-to-date information; to manage Mirocana credit risk or other business risk; to better understand your needs and to serve you better; to process any offers or loyalty credits; or to detect, prevent, manage, and investigate fraud or other unauthorized or illegal activity.

We do not sell customer information to third parties, and will only disclose your personal information to organizations outside the Mirocana Group of Companies without your consent in the following limited circumstances:

- To a person who, in our reasonable judgement, is seeking the information as your agent;
- To another organization upon receiving a subpoena by a court of law;
- To another organization for fraud prevention, detection, and investigation if seeking consent from you would compromise the investigation;
- To a law enforcement agency whenever we have reasonable grounds to believe that you have knowingly supplied us with false or misleading information or are otherwise involved in unlawful activities;
- To a public authority or agent of a public authority if, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;
- To a public authority or agent of a public authority, for emergency public alerting purposes, if a public authority has determined that there is an imminent or unfolding danger that threatens the life, health or security of an individual and that the danger could be avoided or minimized by disclosure of the information. ;

- To assess a third party who may be interested in buying Mirocana assets, and personal customer and/or employee information must be shared in order to assess the business transaction.

We will not make any other disclosure of your personal information unless we have your consent or we are required to do so by law.

We may also de-identify or anonymize information about our customers to identify trends, manage our business, develop statistical information, understand how we are performing, or develop relevant products services or offers. Use of de-identified information may also be shared with third parties for other analytical purposes. De-identified or anonymized information will not personally identify any individual and therefore is not subject to this policy.

#### WILL MIROCANA USE MY INFORMATION FOR DIRECT MAILINGS OR OTHER COMMUNICATIONS?

Mirocana may send you information about other products or services that we, or our affiliates or partners, offer that may be of interest to you. If you do not want to receive such communications, all you have to do is tell us online. If you have given permission and change your mind, you can ask to be removed from future promotional communication from us.

#### HOW LONG WILL MIROCANA RETAIN MY PERSONAL INFORMATION?

Mirocana will only retain your account or personal information for as long as necessary to fulfill the purpose we collected the information, or for sufficient time to allow you access to the information if it was used to make a decision about you or your account. Once we no longer require your account or personal information it will be destroyed or de-identified.

#### WHAT IF I DISAGREE WITH THE ACCURACY OF MY PERSONAL INFORMATION MIROCANA HAS ABOUT ME?

Mirocana ensures that customer information is accurate, complete and up-to-date. Customers can ask to review that information and have the opportunity to challenge its accuracy and completeness and request amendments, as appropriate, by contacting via email.

#### WHERE WILL MY PERSONAL INFORMATION BE STORED?

Account and personal information about our customers may be stored or processed in or outside your place of residence. The information will be protected with appropriate safeguards, but may be subject to the laws of the jurisdiction where it is held.

#### HOW WILL MIROCANA ENSURE MY PERSONAL INFORMATION IS KEPT SAFE?

Mirocana has rigorous security and safeguard processes and procedures in place, to ensure that any account or personal information of our customers remains safe from theft, loss, or unauthorized access.

For example, we use ID validation process as part of our ongoing corporate efforts to protect your personal information associated with your Mirocana account(s). By requesting information from you upfront (e.g. name, phone number and date of birth or other identification), Mirocana can confirm that we are in fact communicating with you or an authorized person to act on your behalf.

All token holders have unique keys to access their digital wallets. Additionally, we are planning to implement a multistep login process to allow a customer to access Mirocana online products and services.

Our processes assist in the prevention of any unauthorized access to your account information that may arise from attempts to commit fraud or identity theft. Mirocana may change this ID validation process from time to time as industry best practices evolve.

#### HOW CAN I GET MORE INFORMATION ABOUT HOW MIROCANA HANDLES MY PERSONAL INFORMATION?

Mirocana makes its privacy policy available online at [www.mirocana.com](http://www.mirocana.com). We have also appointed a member of our team to be held accountable for our privacy policy. Do not hesitate to contact Mirocana regarding a privacy policy questions, concerns, or complaints about how we collect, use, or disclose your personal information.

#### HOW CAN I ACCESS MY PERSONAL INFORMATION THAT IS RETAINED BY MIROCANA?

You can access your personal information retained by us by contacting us by email at [corp@mirocana.com](mailto:corp@mirocana.com).

#### WHAT ARE MY OPTIONS IF I WANT MORE INFORMATION ABOUT PRIVACY?

Mirocana oversees personal information handling practices. If your privacy concerns are not addressed to your satisfaction by Mirocana you may contact the office the government body responsible for personal information in your jurisdiction for further guidance.