

RYKI Privacy Policy

Last revised October 15, 2020

Overview

RYKI Inc. ("**RYKI**") is committed to helping protect the privacy and security of your personal information obtained by reason of your customer relationship with RYKI. Personal information is information about an identifiable individual, such as your name, address, telephone number, or email address ("**Personal Information**"). This privacy policy ("**Privacy Policy**") summarizes what Personal Information RYKI collects, and how we use and disclose this information in providing you with trading services (the "**Services**") and making RYKI.io available to you. This Privacy Policy also describes other important topics relating to your privacy.

By using or accessing the Services, by visiting RYKI.io, or by otherwise choosing to submit Personal Information to RYKI, you signify your consent to all of the terms of this Privacy Policy. If you do not agree with any terms of this Privacy Policy, you may not use the Services or submit any Personal Information to RYKI.

RYKI reserves the right to modify this Privacy Policy at any time. We will reflect any such modifications to this Privacy Policy on this page and will indicate the date on which it was last amended. Your continued use of the Services or access to RYKI.io after any such changes constitutes your acceptance of, and agreement to, this Privacy Policy, as revised. Please periodically review this Privacy Policy so that you know what personal information we collect, how we use it, and with whom we may share it.

This Privacy Policy covers:

1. What Personal Information RYKI Collects.
 - a. We collect Personal Information when you register to use the Services, when we carry out the Services and when you give us information. When you open an account, we may collect your full name, contact information, proof of address (such as a hydro bill), birthdate, occupation, signature, and government ID (such as driver's license, passport, or permanent resident card). If you represent a corporation, you will be asked to provide information about the company, and personal information of its beneficial owners and authorized signatories. You must have their permission to do so.
 - b. When you use the Services, we collect contact information, the purpose, beneficiary, recipient and amount of a trade, the public key for your wallet, information on your bank account and institution needed for the transaction, and any other information you provide.
 - c. When you visit the website, we collect browser information, the date and time of your visit, the pages you view, and the services you request.
2. How RYKI Uses Personal Information. We use information to provide our services, and to meet legal obligations. This includes 'know your client' and anti-money laundering obligations, protecting against fraud or errors, responding to questions, improving or developing services, communicating with you, and carrying out other purposes you agree to.
3. How RYKI Discloses Personal Information. We disclose information to provide services you request (for example to an exchange to allow a trade), to our service providers, and if we enter a business transaction.
4. Your Choices. You can opt-out of our commercial messages, if you receive them.
5. How RYKI Protects Personal Information. While we use physical, organizational and technological safeguards, no security can provide absolute protection. We cannot ensure or warrant the security of any information.

6. We may transfer Personal Information Outside of Canada. We transfer information to the United States, and other countries. Information processed and stored in other countries may be accessed by governments and law enforcement according to their laws.
7. Information Retention. We retain information as necessary to fulfill the purposes for which it was collected or to meet any legal requirements.
8. Your right of Access and Rectification. You can request access to and correction of your personal information we hold.
9. Third Party Sites. While this Site may link to third party sites, we are not responsible for them.
10. How to Contact Us. You may contact us if you have questions or complaints.

1. **What Personal Information RYKI Collects**

We collect Personal Information when you register to use the Services, when we carry out the Services in accordance with the Terms and Conditions, when you provide it to us through other means, or when we are required or permitted to collect it under the applicable laws. The personal information we collect may vary depending on how you interact with our Services. Below, we describe the information we collect when you open an account, use the Services, or use RYKI.io.

(a) Account Opening

When you register to use the Services we may collect the following Personal Information during the process of opening your account:

- Full legal name;
- Residential Address, and proof of your address, such as a hydro bill;
- Date of birth;
- Occupation or type of employment;
- Signature; and
- A copy of your government issued photo ID, such as a driver's license, passport, or permanent resident card

RYKI will retain a copy of your personal identification for compliance purposes.

If you represent a corporate entity, you will be asked to provide information about the corporation you represent. Please note that information about a corporate entity is not "personal information" in most cases. Due to our legal obligations, we require you to provide the full legal name, email address, and government issued photo ID, such as a driver's license, passport, or permanent resident card for each beneficial owner (with 25% or more ownership) and authorized signers for the company. You must have their permission to do so.

Pursuant to the Terms and Conditions, you are required to keep information provided to RYKI upon account-opening accurate and up-to-date.

(b) Use of the Services

We may also collect Personal Information when you use the Services. For example, we collect Personal Information when you request for us to complete a trade on your behalf, when you request to withdraw funds to your personal wallet or bank account, or when you otherwise provide us with Personal Information. Information we collect in this manner may include:

- Phone number;
- E-mail address;
- The purpose, beneficiary, recipient, and amount of a specific trade;

- Your public key for a cryptocurrency wallet;
- Your bank account institution, transit number, and account number as required to initiate a withdrawal of your funds, if instructed by you; and
- Any other information we ask for and which you choose to provide.

(c) *Use of RYKI.io*

When you visit or use RYKI.io, we may collect information that is automatically sent to us by your web browser, device or your internet service provider. This information may include:

- the type of browser or device you use;
- the date and time of your visit
- which pages or portions of RYKI.io you view or use; and
- the files or services you request or use.

We use this information in the aggregate, to better understand how visitors use RYKI.io, and to improve RYKI.io and the Services. The amount of information that is sent by your web browser depends on the browser and settings you use. Please refer to the instructions provided by your browser if you want to learn more about what information it sends to websites you visit, or how you may change or restrict this.

We may use a tool called a "cookie" and/or other similar technology. Cookies are small files that your web browser places on your computer or device's hard drive. We use cookies for load balancing on our website, to help prevent abuse of our services, and to better understand how our website is used.

Your browser may give you the option to reject cookies. However, setting your browser to reject cookies generally hinders the browser's performance and may adversely affect your experience while using our website.

2. **How RYKI Uses Personal Information**

The Personal Information we collect may be used, now or in the future, by RYKI for the purposes for which it was collected, as provided in this Privacy Policy, or for other purposes that are disclosed to you and to which you consent, or which are required or permitted by applicable law. For example, we may use your Personal Information to:

- Comply with our obligations under the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (the "**PCMLTFA**") and other laws and regulations applicable to the Services;
- Protect against fraud or error;
- Offer the Services in accordance with the Terms and Conditions;
- Respond to your questions or inquiries;
- To improve the Services, as well as to develop new services;
- To supply you with requested information;
- To send you informational communications that you have agreed to receive such as if you request our newsletter or other communications; and
- To carry out other purposes that are disclosed to you and to which you consent.

We retain the right to use Personal Information to produce anonymous non-identifiable information, and to use or disclose such non-identifiable information in any manner we deem appropriate.

3. **How RYKI Discloses Personal Information**

RYKI Inc. may disclose Personal Information in the following circumstances:

- We may disclose Personal Information to an exchange in order to execute a trade requested by you. When we disclose Personal Information to third party exchanges to execute a trade, we only

share the information as required in order for the exchange to execute the trade in compliance with its obligations under applicable laws and regulations.

- We may retain service providers to perform functions on our behalf, including account-opening, identity verification, and transaction reporting. When we disclose information to service providers, the service provider will only have access to Personal Information to the extent necessary to permit the service provider to perform its function.
- We reserve the right to transfer any Personal Information we have about you in the event that we merge with or are acquired by a third party or should any such transaction be proposed.

4. Your Choices

If you have provided us with your contact information, or have agreed to receive commercial messages from but later decide you no longer want us to send you any commercial communications from us, you may inform us by e-mail to info@RYKI.io that you no longer want to receive commercial communications from us.

5. How RYKI Protects Personal Information

The security of your Personal Information is important to RYKI. We protect your Personal Information by maintaining physical, organizational and technological safeguards intended to help protect against unauthorized use, disclosure or access. Personal Information may be accessed by persons within our organization, or our third party service providers, who require such access to carry out the purposes indicated above, or such other purposes as may be permitted or required by applicable laws.

Although we have taken measures to help protect any Personal Information that we have collected from unauthorized use, access, disclosure, misuse, alteration or destruction, no security measures can provide absolute protection. We cannot ensure or warrant the security of any information you provide to us.

6. We may transfer Personal Information Outside of Canada

Some or all of the Personal Information we collect may be stored or processed on servers or by service providers located outside of Canada, including in the United States. Some Personal Information collected by RYKI may therefore be retained in countries other than Canada where privacy laws may offer different levels of protection from those in Canada and Personal Information may be subject to access by and disclosure to governments and law enforcement agencies in those jurisdictions.

By providing us with Personal Information, you understand and expressly agree that we may transfer it outside of Canada or your jurisdiction of residence. If you do not agree to the transfer of your Personal Information outside of Canada, do not provide us with Personal Information.

7. Information Retention

We retain Personal Information that we collect as long as reasonably necessary to fulfill the purposes for which it was collected or to meet any legal requirements, including our obligations as a money services business under the *PCMLTFA*. We destroy Personal Information or render it unidentifiable when it is no longer needed for the purposes for which it was collected.

8. Your Right of Access and Rectification

You have a right to request access to your Personal Information and to request a correction to it if you believe it is inaccurate. If you have submitted Personal Information to RYKI and would like to have access to it, or if you would like to have it removed or corrected, please contact us using the contact information provided below. We will use reasonable efforts to comply with your request; however, in some cases we may not be able to allow you to access certain Personal Information in certain circumstances, for example if it contains Personal Information of other persons, or for legal reasons. In such cases, we will provide you with a reasonable explanation of why it is not possible to grant access to your Personal Information. We may require you to verify your identity before you access your Personal Information.

9. Third Party Sites

Our website and Platform may contain links to websites owned by third parties. These other websites may have their own privacy policies and terms and conditions that are not governed by this Privacy Policy. We are not responsible for the privacy practices or the content of any website(s) owned and operated by third parties. Other websites may collect and treat information collected differently, so we encourage you to carefully read and review the privacy policy for each website you visit. Any links from this site to other websites, or references to products, services or publications other than those of RYKI, do not imply the endorsement or approval of such websites, products, services or publications by RYKI.

10. How to Contact Us

If you have any questions regarding this Privacy Policy, any Personal Information you have submitted to us, or if you would like to:

- access Personal Information that you have already provided to us so that you can correct or update it, or request that it be deleted;
- request the deletion of Personal Information regarding your minor child; or
- report any violation of this Privacy Policy,

please advise us by contacting our Privacy Officer at one of the following addresses, or info@RYKI.io:

RYKI Canada - 139 Northfield Dr. W Suite 3. Waterloo, Ontario N2L 5A6.

RYKI Cayman - Po Box 10190 George Town, Grand Cayman Ky1-1002 Cayman Islands

RYKI BVI - PO Box 4031 Road Town, Tortola, British Virgin Islands VG-1110