

Privacy Policy

As of 2025 / 09 / 25

Please read carefully the terms of the Privacy Policy below. By using website <https://www.lendao.com> (“Site”), you confirm that you are aware of the purposes and methods of collecting and processing the personal data, and you consent to the processing of personal data by the persons specified in this privacy policy (“Privacy Policy”).

1. General Provisions

- 1.1. Privacy Policy sets out how Algorithm forge Limited, company registration number 2149173, office address – Intershore Chambers, PO Box 4342, Road Town, Tortola, VG1110, British Virgin Islands (“Lendao”, “Platform”, “we”, “us”, “our”) collects, uses, stores and processes personal data from users (“you”, “your”) in connection with your use of the Site and its services.
- 1.2. We reserve the right to change the Privacy Policy from time to time, so we ask you kindly to regularly check the current version of the [Privacy Policy](#) to ensure that you are content with the latest changes.
- 1.3. Before using the Site, please also read the privacy policies of our partners on KYC, AML, CFT, financial scoring, payment processing and whitelisting matters.
- 1.4. We comply with all rules regarding the collection, processing and storage of personal data as set out in the Privacy Policy. If you do not agree with the Privacy Policy or our partner’s policies, please leave the Site and do not use our services.
- 1.5. Note that you can withdraw your consent at any time. Such withdrawal of consent would not affect the lawfulness of data processing done prior to the withdrawal of consent.
- 1.6. We do not collect or process data relating to race, political positions, religious and other beliefs and membership of social and political organizations.
- 1.7. Our Site, services and products are intended for use only by adults. If you are not one, please stop using the Site, as we do not collect or process any information about persons under the age of 18.

2. Personal data

- 2.1. We typically collect or obtain your personal data because you give it to us or because third-party service providers that we use to help operate our Site provide us with.
- 2.2. We only collect and process personal data that is necessary to provide you with our services and to comply with legal obligations imposed on us by applicable law such as Know-Your-Customer (KYC) checks that are needed before accepting you to use our services. This includes the following personal data:
 - e-mail address;
 - technical data such as internet protocol (IP) address and your geographic location, contact lists, images and files, details of inbound and outbound calls, text messages, your login data, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use to access this Site;
 - cookies (detailed in Section 3);

- cell phone number;
 - your residential address and registration address;
 - first, middle and last name;
 - date of birth;
 - gender;
 - image and biometrics;
 - passport number and other national ID details;
 - profile data such as your username or similar identifier and password, profile picture, product or service requests made by you, your interests, preferences, feedback and survey responses;
 - your financial background and financial data such as bank account, payment card or crypto wallet details;
 - transaction data such as details about payments to and from you and other details of products and services you have been provided by us.
- 1.3. In some cases, we may also collect personal data about you indirectly from third parties including, but not limited to:
- third parties such as providers of KYC and AML services, which we use to help us meet our legal obligations and to help us verify your identity where we provide you with products or services;
 - background check providers;
 - third-party service providers that help us to operate our platforms;
 - banks and financial institutions; and
 - credit reference organizations and credit bureaus.
- 1.4. You are able to change your personal account data on the Site by submitting new information.
- 1.5. We may also collect and process data contained in your feedback, comments, appeals, complaints, requests, grievances sent to our email: support@lendao.com .

3. Cookies

- 3.1. In order to improve your experience when you use our platforms and to ensure that it is functioning effectively, we (or our service providers) also use cookies (small text files stored in a user's browser) and web beacons (small graphic images that are placed on a site and used to monitor a user's interaction with that website) which may collect personal data. Cookies alone cannot be used to identify you.
- 3.2. We may use the following cookies on the Site:
- **Necessary cookies.** These cookies are necessary for the correct functioning of the Site. As they are necessary for proper functionality, they are always activated and cannot be canceled.
 - **Functional cookies.** These cookies are used to improve your user experience when you visit the Site. For example, they may remember your user preferences. If you do not allow these cookies, some features of the Site may not work properly.
 - **Analytical cookies.** These cookies allow us to analyze your use of the Site and improve its functionality. Analytical cookies help us know how often you visit the Site and when, in addition to how long your visit to the Site lasts and how well it

works during your visit. If you do not authorize the use of these cookies, we will not know when you visited the Site and will not be able to track its performance.

- **Advertising cookies.** These cookies are set by our advertising partners on our Site. These companies may use these cookies to build a profile of your interests and to show you relevant ads on other home pages. If you do not allow these cookies, you will receive less targeted advertising.

1.3. Some cookies are being collected from the moment you log in to the Site until the end of the browser session. When you close your browser, these cookies are automatically deleted. Some cookies remain on your device between sessions and are not deleted when you close your browser. The retention time of such cookies is a maximum of 12 months from your last visit to the Site.

1.4. You can customize your browser settings to refuse or delete cookies. Click on the “Help” function of your browser to learn more about how you can customize the settings in the browser you use. Please be aware that refusing, disabling or deleting cookies may cause some features of the Site to become unavailable or not work properly.

4. Purposes of and grounds for data processing

4.1. Data is collected and processed to ensure the correct operation of the Site, to provide you with our services, such as digital currency rental or affiliating with the Platform as a liquidity provider or guarantor, to comply with applicable laws, to protect our rights and interests (as well as the rights and interests of users or third parties), to detect any malicious or fraudulent activity, and for the following purposes:

- to manage and improve our products and services;
- to manage and improve our Platform (including by drawing up statistics on the usage of our Platform);
- to tailor the content of our Platform in order to provide you with a more personalized experience and draw your attention to information about products and services that may be of interest to you;
- to manage and respond to any request that you submit through our Platform;
- to help us learn more about you, the products and services that you receive from Lendao, and other products and services that you might be interested in receiving;
- to correspond with you in relation to services you use or information you provide via our Platform;
- to fulfill requests and communications from public or judicial authorities with the necessary authorization in accordance with the applicable law;
- contacting you to receive feedback on our products or services, and for other marketing or research purposes;
- purposes of recruitment and business development;
- purposes of prudent operational management (including fraud and risk management, audit, training and similar administrative purposes);
- purposes of services we receive from our professional advisors, such as lawyers, accountants and consultants;
- if you are referred to us by an intermediary or similar third party, we also typically use your personal data to assess whether to accept or reject your referral to Lendao by that intermediary or a similar third party;
- to fulfill arrangements that we have in place with intermediaries, brokers and other individuals and entities that partner with us; and

- meeting our corporate and social responsibilities.
- 1.2. The processing of personal data is limited to the achievement of specific and legitimate purposes. We do not allow the processing of data that is incompatible with these purposes.
 - 1.3. We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us: support@lendao.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

- 1.4. We process your personal data on lawful grounds. The grounds on which we process personal data are:
 - **Data Subject Consent:** We process your personal data on the basis of your voluntary, informed and explicit consent. Please note that we may process your personal data without your knowledge or consent, in compliance with the applicable rules, where this is required or permitted by law.
 - **Performance of contractual obligations:** We process your personal data in order to fulfill contractual obligations to which you are a party or to take measures to enter into a contract at your initiative, including conducting due diligence checks in advance of providing products or services to you and to process an application from you to receive services from us.
 - **Legal Compliance:** We process your personal data to comply with our legal obligations (e.g., KYC and AML obligations) under applicable law.
 - **Protection of rights, vital interests and legitimate interests:** We process your personal data to protect your vital rights and interests, as well as our rights and legitimate interests and to fulfill public purposes while respecting your rights and freedoms, such as preventing fraud and other abuse.

5. Data transfer to third parties

- 5.1. It may be necessary for us to share your personal data with third parties. These third parties may include the following:
 - our affiliated persons;
 - professional advisors and third parties that provide services to us (such as IT systems providers, platform providers, financial advisors, consultants including lawyers and accountants etc.);
 - debt guarantors, bill collectors, credit reference agencies and bureaus (if you are a digital currency renter);
 - other goods and services providers (such as providers of marketing services where we are permitted to disclose your personal data to them);
 - background-check organizations, organizations that help us detect criminal activity and incidence of fraud;
 - a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of Lendao business or assets;

- any other person you have authorized us by your consent or we have a legal obligation to share your personal data with.
- 1.2. We may disclose your personal information in accordance with requests from public authorities if such requests comply with applicable law.
 - 1.3. We require all third parties to respect your privacy and ensure security of your personal data, and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.
 - 1.4. Whenever we transfer your personal data collected in one country to third countries, we ensure that a similar degree of protection is afforded to it in the country to which it is transferred. In any case, we may transfer data in a third country where the recipient country is on the data protection whitelist for the transfer of personal data as set out in the applicable regulations.

6. Data retention

- 6.1. All personal data you provide to us may be stored on our secure cloud-based data storage as well as on our premises, off-site based locations and network-accessible storage which include external drives only for authorized users. By providing your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.
- 6.2. We erase/delete personal data in the event of any of the following:
 - the personal data is no longer necessary in relation to the purposes for which they were collected or processed;
 - you withdraw your consent or object to the processing and there is no overriding lawful basis for the processing;
 - the personal data was unlawfully collected or processed in the first place; or
 - in compliance with lawful directives from government regulators.
- 1.3. We take appropriate organizational, legal and technical measures to securely store your personal data. Given that no method or method of storing information on the Internet is completely safe and secure, we do not fully guarantee the security of any information you transmit.
- 6.3. We will retain personal data until you request its disposal or for no longer than required for the purposes of processing personal data and/or compliance with any legal, regulatory, tax, accounting, reporting requirements or internal policy requirements. We endeavor to dispose of your personal data once we have concluded that we no longer require your personal data in connection with the purpose for which it was collected and if disposing of such personal data would not expose us to any actions, sanctions or claims.

The periods for which we hold different categories of data differ. For example, we may hold personal data received:

During a request to the help desk – for 3 years after the resolution of such request;

While handling customer complaints – for 6 years after the resolution of the complaint;

- 6.4. We do not control third party websites and accept no responsibility for their privacy statements, including our partners'. We disclaim responsibility for their content, privacy policies and terms of use, and make no representations regarding their completeness, content or accuracy – please be cautious when using them and check their privacy policies. We are not liable for the unauthorized collection, leakage, disclosure and misuse of your personal information resulting from your use of third-party websites linked to the Site.
- 6.5. It is your responsibility to maintain the security of your personal account with all possible measures to prevent others from accessing it.

7. Your rights

- 6.6. **Rights of access:** You have the right to request access to your personal data, including obtaining copies.
- 6.7. **Right to information:** You have the right to obtain without constraint or unreasonable delay confirmation as to whether we are storing or otherwise processing personal data relating to you as well as:
- the purposes of the processing;
 - the categories of personal data concerned;
 - the recipients or categories of recipient to whom the personal data have been or will be disclosed, particularly recipients in third countries or international organizations;
 - where possible, the period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - the existence of automated decision-making, including profiling, the significance and envisaged consequences for the you;
 - other information which can be requested under the law.
- 1.3. **Right to amend:** You have the right to request that we amend any of your personal data if you believe that the personal data we process is incorrect, inaccurate or incomplete.
- 6.8. **Right to dispose:** You have the right to request the disposal of your personal data in whole or in part. For example, if you believe that the personal data is no longer necessary for the purposes for which it was collected or if you believe that its collection and processing is unlawful.
- 6.9. **Right to withdraw consent:** You have the right to withdraw your consent to the collection and processing of your personal data or to restrict such processing at any time.
- 6.10. **Right to lodge a complaint/claim:** You have the right to lodge a complaint or claim relating to the collection and processing of your personal data, which will be promptly dealt with by us.
- 6.11. **Other rights,** including a right to object to automated decision making – you can ask us to review a decision made solely by automated processing if it negatively impacts you.
- 6.12. To exercise any of your rights, you may contact us via channels mentioned in article 8.5 of the Privacy Policy.

8. Final provisions

- 6.13.** We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Our marketing communications have opt-out links through which you can inform us to stop processing your data for such purposes.
- 6.14.** We respect your rights regarding any issues related to the collection and processing of personal data, ensuring that any requests you make are dealt with promptly and transparently.
- 6.15.** We do not guarantee the error-free operation of the Site in accordance with the Privacy Policy. We use reasonable efforts to comply with the Privacy Policy and shall not be liable for any incidental, direct or consequential damages arising from your use of the Site.
- 6.16.** In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your personal data, we shall within 72 hours of having knowledge of such breach report the details of the breach to the appropriate government agency. Where we ascertain that such breach is detrimental to your rights and freedoms in relation to your personal data, we shall within 7 days of knowledge of the occurrence of such breach take steps to inform you of the breach incident, the risk to your rights and freedoms resulting from such breach and any course of action to remedy said breach.
- 6.17.** For any questions arising from the collection and processing of your personal data, you may contact us by email at support@lendao.com or write to Algorithm forge Limited (Lendao) office at Intershore Chambers, PO Box 4342, Road Town, Tortola, VG1110 British Virgin Islands.