PRIVACY NOTICE

Provenance Ltd ('Provenance') takes data privacy seriously. We recognize and value the trust individuals/data subjects place in us when providing us with personal information. We are committed to taking reasonable steps to safeguard the privacy and secure the personal information we may collect from visitors to our websites, visitors to our premises, our service providers, and/or the clients to whom we provide services. This privacy notice aims to help you understand our personal information collection practices, the legal grounds that justify using your personal information, and our disclosure practices. We may provide you with further notices highlighting specific uses we wish to make of your personal information, and we may also give you the ability to opt-in or out of selected uses when we collect personal information from you. This privacy notice supplements other notices and privacy policies we may provide you occasionally and is not intended to override them. Please note: This privacy notice does not apply to, and Provenance is not responsible for, any third-party websites which may be accessible through links from this website. If you follow a link to any of these third-party websites, they will have their own privacy policies, and you will need to check these policies before you submit any personal information to such third-party websites.

1. Who we are and what we do

As the virtual assets industry is on the brink of mainstream adoption, the demand for services in this space far exceeds the capabilities of traditional compliance providers. Provenance has established service lines across the specialist functions of compliance, risk and advisory, focusing on enhancing compliance and risk management solutions available to virtual asset Funds, Managers, Foundations, Service Providers, and other participants in the virtual asset industry. Provenance has built a universal compliance framework that addresses the current gap in the virtual assets space but also aligns with where we see the industry going over the next few years. We can build holistic, automated, cost-effective control frameworks to ensure compliance with local and international requirements, which can be easily adapted to increasing regulatory pressure. We call this embedded compliance framework, or compliance-by-design, ensuring that risk frameworks and controls align with growth strategy and business needs. We offer the traditional range of Anti Money Laundering/Countering Financing of Terrorism/Countering Proliferation Financing/Targeted Financial Sanctions ('AML/CFT/CPF/TFS' hereinafter referred to as 'AML') services and other compliance services. This privacy notice applies to the personal information processed by Provenance while operating our business and providing our services.

2. What personal information we collect about you

We may collect and process different types of personal information while operating our business and providing our services. These may include:

a. Basic personal details such as name and job title.
b. Contact information such as telephone number, postal address, and email address.
c. Financial information such as payment-related information or bank account details.
d. Wallet Addresses for the purpose of conducting wallet screenings.
e. Demographic information such as address, preferences, or interests.
f. We collect website usage and technical information through cookies and other tracking technologies.
g. Personal information provided by you or generated in the course of providing our services.
h. Identification and background verification information as required by applicable laws and regulations.
i. Recruitment-related information such as curriculum vitae, education and employment history.
j. Information during event registrations or meetings.
k. Giveaways and contests we hold.

3. How we obtain personal information about you

We may collect or receive your personal information in various ways:

a. Directly from you when you provide it, such as through correspondence, completing forms, or interacting with our website.
b. From third-party sources, such as when we conduct "know your client" or “know your business” checks or receive information from recruitment agencies.
c. From publicly available sources, which we may use to keep your contact details accurate and up to date or for professional networking purposes.

4. How we obtain personal information about you

How we use your personal information We will only use your personal information where we are permitted to do so by applicable law. The principal legal grounds that justify our use of your personal information are:

a. Contract performance: where your information is necessary to enter into or perform a contract with you.
b. Legal obligation: where we need to use your information to comply with our legal obligations.
c. Legitimate interests: where we use your information to achieve our or your legitimate interests, and our reasons for using it outweigh any prejudice to your data protection rights.

d. Legal claims: where your information is necessary for us to defend, prosecute, or make a claim on behalf of you, us, or a third party.
e. Consent: where you have consented to our use of your information.

5. We may use your personal information for various purposes, including:

a. Providing our services to you and conducting our business.
b. Facilitating the use of our websites and ensuring relevant content.
c. Marketing and business development purposes, with written consent.
d. Research and development purposes.
e. Recruitment purposes.
f. Fulfilling legal, regulatory, or risk management obligations.
g. Ensuring the security and integrity of our systems and data.

6. Disclosure of your personal information:

We may share your personal information with third parties in certain circumstances, including:

a. Service providers: We may share your personal information with third-party service providers who perform services on our behalf, such as IT support, website hosting, and data analysis.
b. Business partners: We may disclose your personal information concerning joint marketing or promotional activities to our business partners, provided that you have consented to such disclosures.
c. Legal obligations: We may disclose your personal information to comply with applicable laws, regulations, legal processes, or governmental requests.
d. Merger or acquisition: In the event of a merger, acquisition, or other corporate reorganization, we may disclose your personal information to the relevant parties involved in the transaction.
e. Consent: We may disclose your personal information to third parties if you have consented to such disclosures.

7. International data transfers:

We may transfer your personal information to countries outside your country of residence in certain circumstances. These countries may have different data protection laws than your own. In such cases, we will ensure that appropriate safeguards are in place to protect your personal information in accordance with applicable data protection laws.

8. Data retention:

We will retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including any legal, accounting, or reporting requirements. The specific retention period will vary depending on the nature of the information and the purposes for which we process it.

9. Your rights:

You have certain rights regarding your personal information, subject to applicable laws. These rights may include the right to:

a. Access your personal information and request copies of it.
b. Rectify inaccurate personal information we hold about you.
c. Delete your personal information, subject to certain exceptions and regulations.
d. Restrict or object to the processing of your personal information.
e. Withdraw your consent, where our processing is based on your consent.
f. Receive your personal information in a structured, commonly used, and machine-readable format and transmit it to another data controller.
g. Update personal information that we hold about you.

10. Security measures:

We take appropriate technical and organizational measures to protect your personal information against unauthorized access, loss, or alteration. We regularly review our security practices to ensure your personal information's ongoing confidentiality, integrity, and availability.

11. Contact us:

If you have any questions, concerns, or requests regarding this privacy notice or our data protection practices, please get in touch with us using the following contact details:

Provenance Ltd.
Whitehall Chambers
2nd Floor Whitehall House
238 North Church Street
PO Box 31489
Grand Cayman KY1-1206
Cayman Islands
www.provenancecompliance.com / info@provenancecompliance.com

Changes to this privacy notice

We may update this privacy notice occasionally to reflect changes in our data protection practices. We encourage you to review this notice periodically for any updates.