

## PRIVACY POLICY INNOTECH LABS LTD

**Last Updated: 07th January 2025**

Innotech Labs Ltd ("Innotech", "the Company", "We", "Us") is committed to protecting the privacy and security of your personal data. This Privacy Policy outlines how we collect, use, and protect your information in accordance with the Data Protection Act, 2011 ("DPA") of Trinidad and Tobago and the Virtual Assets and Virtual Asset Service Providers Act, 2025.

By providing your information to the Company, you consent to the processing of your data in accordance with this Privacy Policy. You should read this policy alongside the Terms of Use associated with our services.

### 1. DATA PROTECTION PRINCIPLES

In accordance with Trinidad and Tobago law, Innotech adheres to the following principles:

- **Accountability:** We are responsible for personal information under our control.
- **Purpose:** We will identify the purposes for which information is collected at or before the time of collection.
- **Consent:** Your knowledge and consent are required for the collection, use, or disclosure of personal information.
- **Limitation:** We only collect data necessary for our regulatory and service requirements.

### 2. INFORMATION WE COLLECT

To provide our services and comply with Anti-Money Laundering (AML) laws, we collect:

- **Identity Data:** Name, date of birth/ date of incorporation/ commencement, nationality, and government-issued identification (National ID, Passport, or Driver's License), shareholder details, ultimate beneficial owner, senior officer details.
- **Contact Data:** Residential/ Corporate/ registered office address, email address, and phone number.
- **Account Data:** bank account details, crypto wallet details.
- **Sensitive Personal Information:** As defined by the DPA, this includes financial records and biometric data (for KYC verification).
- **Technical Data:** IP addresses, device information, and transaction history on the blockchain.

### 3. LEGAL BASIS FOR PROCESSING

We process your data under the following legal grounds:

- **Regulatory Necessity:** To fulfill our obligations under the Proceeds of Crime Act and the VA/VASP Act 2025.
- **Contractual Necessity:** To execute your trades and manage your digital wallet as per the Services offered by Us.

- **Express Consent:** Where you have explicitly agreed to the processing of your data for marketing and promotional activities or enhanced features.
- **Communication:** To respond to communications and your queries w.r.t Services

#### 4. HOW WE USE YOUR INFORMATION

We use your data to provide you with our Services, help you log in to your account, verify who you are, secure your data, fight fraud, follow the law, enforce our agreements, figure out what new products we can build, and market products to you that we think could make it easier for you to run your business.

- **Performing, Improving and Developing our Services**
  - a. Delivering the information and support you request, including technical notices and providing assistance for problems with our Services or your Innotech account;
  - b. Developing new products and services;
  - c. Displaying your transaction history;
  - d. Processing payment transactions;
  - e. Providing, maintaining and improving our Services;
  - f. Doing internal research, measuring, tracking and analyzing trends and usage;
  - g. Otherwise providing you with the Innotech Services you use.
- **Communicating with You About our Services**
  - a. Providing information about and promoting our Services to you and seeking feedback on our Services;
  - b. Sending you information we think you may find useful or which you have requested from us about our Services.
  - c. Sending you Service and transaction updates.
- **Protecting our Services and Maintaining a Trusted Environment**
  - a. Conducting investigations, complying with and enforcing applicable laws, regulations, legal requirements and industry standards, and responding to lawful requests for information from the government or in legal proceedings;
  - b. Contacting you to resolve disputes, collect fees and provide assistance with our Services;
  - c. Detecting, preventing, and protecting against fraud, damage, loss, and criminal activity;
  - d. Verifying your identity (e.g. age and identity);
  - e. Complying with our policies and the policies set by our partners;
  - f. Enforcing our Terms of Service and other agreements.

#### 5. DATA STORAGE AND CROSS-BORDER TRANSFERS

- **Local Infrastructure:** Innotech maintains its data server within the Republic of Trinidad and Tobago.
- **International Transfers:** If data is transferred outside of Trinidad and Tobago (e.g., to our group entity PeepalCo for technical support), we ensure the recipient jurisdiction provides a comparable level of protection as mandated by the DPA 2011.

#### 6. DISCLOSURE OF YOUR INFORMATION

We may share your information with:

- **Regulatory Authorities:** The Trinidad and Tobago Securities and Exchange Commission (TTSEC) and the Financial Intelligence Unit (FIUTT & FIU-IND) as required by law.
- **Service Providers:** Third-party KYC verification partners and cloud service providers who are contractually bound to our privacy standards and other vendors in order to provide you Services.
- **With our Affiliates and Group Companies:** With other companies in the Innotech group and corporate affiliates, for the reasons outlined above. For example, we may share your information internally to understand how you interact with Innotech to help make our Services better for you or for outsourced services like accounting purposes etc.
- **Legal Requirements:** When compelled by a warrant or order from the High Court of Trinidad and Tobago.

## 7. YOUR RIGHTS (INDIVIDUAL ACCESS)

Under the Data Protection Act, you have the right to:

- **Access:** Request a copy of the personal information we hold about you.
- **Correction:** Request that we rectify inaccurate or incomplete data.
- **Withdrawal of Consent:** Withdraw your consent for data processing (Note: This may result in the closure of your account to remain compliant with AML laws).
- **Complaints:** Challenge our compliance with these principles.

## 8. DATA SECURITY

We implement robust technical and organizational measures (including encryption, authentication and authorization) to protect your data against unauthorized access, loss, or destruction.

Nevertheless, the internet is not a 100% secure environment, and we cannot guarantee absolute security of the transmission or storage of your information. We hold information about you both at our own servers and with the assistance of third-party service providers.

## 9. RETENTION OF DATA

In accordance with Trinidad and Tobago regulatory requirements, we retain your personal and transaction data for a minimum of six (6) years following the closure of your account or the expiration of our Sandbox Certificate of Acceptance.

## 10. MODIFICATIONS

We may update this Privacy Policy from time to time. Where changes are minor or administrative, We will post the revised policy on our website. Where changes materially affect how we use your personal information or your rights under applicable law, we will provide at least thirty (30) days' prior notice.

If you do not agree with the changes, you may discontinue use of our Services or terminate your account with Innotech. Your continued use of our Services after the effective date of any changes constitutes your acceptance of the updated Privacy Policy.

## 11. CONTACT OUR PRIVACY OFFICER

If you have questions about this policy or wish to exercise your rights, please contact our **Compliance Officer**:

**Innotech Labs Ltd** - 5th Floor Savannah East, 11 Queen's Park East, Port of Spain, Trinidad and Tobago.

**Email:** [support@tokenprime.co](mailto:support@tokenprime.co)