

Privacy Policy

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This Privacy Policy outlines how Paera LLC. (referred to as "Paera," "we," "our," and "us," including its affiliates, successors, assigns, and subsidiaries) collects, uses, and shares your information. It also details your rights and choices concerning this information. "You" or "your" refers to the individual interacting with us.

This Privacy Policy applies to the mobile application of Tangem Pay within the Tangem mobile app (the "App") or use of any Services (as defined in the Tangem Pay Terms and Conditions).

By accessing the App or by applying for or using the Services, you represent that you have read and agree to be bound by this Privacy Policy, including consenting to our collection, use, and sharing of Personal Information. If you do not agree, please notify us in writing, close your Tangem Pay Account, delete any cookies you may have on your devices, and cease all use of the Services.

Any capitalized terms not defined herein will have the meaning assigned to them in the Dashboard Agreement or accompanying agreements including but not limited to the Tangem Pay Card Agreement and Tangem Pay Terms and Conditions. This Privacy Policy does not apply to any other website operated by any third party.

We reserve the right to amend this Privacy Policy at any time. When we make changes to this Privacy Policy, they will be posted on our website page and the "Last Updated" date, above, will be modified. Notwithstanding the foregoing, by continuing to use the Services, you agree to be bound by such amendments, additional obligations or restrictions.

If you are a Brazilian resident, please see the additional disclosures at the end of this Privacy Policy.

1. Introduction

We are committed to safeguarding your privacy and ensuring the security of your personal data. Therefore, we issued this Privacy Policy explaining what information we collect, how we use it, and the choices you can make about the way your information is collected and used.

2. Your Information and the blockchain

When you use our Services to interact with public blockchain networks (such as Polygon or other supported chains), you remain in full control of your wallet and digital assets. All transactions you initiate are executed directly on the blockchain and are recorded on a public, immutable ledger. Because of the transparent nature of these systems, information published on-chain may be accessible to anyone and cannot be altered or deleted. Please ensure you understand these characteristics before engaging in blockchain transactions.

3. Information We Collect

A. Information you provide to us

We collect information when you use or interact with our Services or Sites. This may include:

“Personal Information” which means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer, device, or household. Examples include:

- First name, last name
- Email address
- Phone number
- Date of Birth
- Social Security Number, driver’s license, and / or passport as needed for account creation
- Residency address

B. Information we collect automatically from you

We or our vendors or service providers may also automatically collect information when you use the Sites or the Services to, for example, protect against fraud or to improve our products, Services, and user experience.

This information can include:

- Your browser type;
- Your device type or operating system;
- Your device’s location and other information sent by your device;
- Your device’s IP address;
- Your interaction with the Site or the Services, such as number of clicks, landing pages and pages viewed. We utilize session replay software to capture this information, and by using the Site or the Services you consent to our capture and use of this information.

C. Information we collect from you with respect to your use of the Services

We may collect or have access to transactional information about your use of the Services. This information can include:

- Amount, type, and size of transactions or purchase details
- Date and time of transactions
- Merchants where you have transacted using a Tangem Pay Card
- Repayment history
- Financial data

D. Tracking and Cookie Data

Like many online services, we may use cookies or other tracking technologies to gather information about you. Additionally, third parties might place cookies on your device to collect specific device identifiers, IP addresses, and data about your interactions with our Site and Services.

Cookies are small data files placed on your computer, phone, or similar device when you visit our Sites or use our Services.

Examples of the cookies we may use include:

- Session cookies: These help us identify users who visit our Sites.
- Tracking cookies: These help us remember your preferences and other settings.
- Security cookies: These help us prevent fraud.

You have the option to accept or decline cookies through your internet browser's settings. Most browsers allow you to disable the cookie feature, which will prevent your browser from accepting new cookies. However, please be aware that if you do not accept cookies, you may not be able to use certain parts or all of our Sites.

E. Information We May Collect from Third Parties

We may check the information you provide or we obtain with data from third parties like credit bureaus, data providers, fraud detection services, and data analytics providers. Some of these third parties may gather your Personal Information via your use of our Sites or Services, while others may already possess and share your Personal Information with us.

We do not govern the tracking technologies employed by these third parties or their usage. For inquiries about advertisements or other targeted content, please contact the responsible provider directly.

4. [How We Use Information](#)

We collect and use your information for various business and commercial purposes, as outlined below:

A. Service Eligibility & Account Management

- Assessing Eligibility: Verifying your identity and underwriting you for a Tangem Pay Account through Paera to determine your eligibility for our services.
- Supporting Operations: Maintaining your Tangem Pay Account, improving our existing services and products, and developing new ones.

B. Communication & Marketing

- Customer Service: Providing support and assistance to you.
- Marketing: Sending you promotional offers and information about our products and services. We may also track email opens to improve our services.

C. Compliance & Security

- Policy & Legal Compliance: Adhering to our internal policies and procedures, including legal, regulatory, contractual, and audit obligations.

- Fraud Prevention: Detecting and preventing fraudulent or unauthorized transactions, policy breaches, and threats of harm.

We may communicate with you via the means you've provided, such as your email address (directly or through the Company), to send promotional offers or service-related updates. We may also receive confirmation when you open our emails, which helps us enhance our services.

4. [Sharing Information](#)

We share collected information, including personally identifiable data, in line with this Privacy Policy. Categories of parties with whom we share information include:

- Service Providers, Vendors, and Advisors: We may share your Personal or Company Information with third parties who provide us with services or products, or who help us provide Services to you. This includes our Banking Partners, the Issuer, or Third-Party Providers. Such service providers may also require your consent to obtain your Personal Information.
 - For identity verification, we use a service provider that collects and uses biometric information from your driver's license and/or passport photo to match against your image. This biometric information is held by the service provider according to their privacy policy, available at: <https://sumsub.com/privacy-notice-service/>
- Our Affiliates and Group Companies: We may share your Personal Information with other companies within our corporate group, including our parent company, subsidiaries and affiliates under common control, whether located in your country of residence or abroad. Such intra-group sharing is limited to the following purposes: (i) providing, operating, servicing and supporting the Services, including customer support, account management and shared technology, security and infrastructure functions; (ii) marketing and commercial purposes, including market research, customer analytics, product development, and sending you promotional offers and information about products and services offered by us or by other companies within our group; (iii) financial, accounting, tax and management reporting purposes, including the preparation of consolidated financial statements, budgeting, internal audit and management reporting to our parent company; and (iv) group-level risk management, fraud prevention, anti-money laundering, sanctions screening and other compliance, audit and regulatory obligations applicable to our group. Companies within our group that receive your Personal Information are bound by intra-group agreements requiring them to process it solely for the purposes described in this Privacy Policy and to apply security measures no less protective than those described herein. We rely on the performance of our contract with you, on compliance with our legal and regulatory obligations, and on our legitimate interests and those of the other companies in our group in operating our business efficiently, as the lawful bases for this sharing. Where required by applicable law, we will instead rely on your consent, which you may withdraw at any time, and you may object to processing based on legitimate interests or opt out of marketing communications as described in the "Choices About Your Personal Information" section.
- Our Financing Partners: Such as sources of debt or equity capital.
- Issuers of your Tangem Pay Card.
- Merchants and Businesses: With whom you transact or use your Tangem Pay Card.
- Third Parties for Due Diligence: As part of any due diligence process related to a partnership, financing arrangement, or potential purchase of Paera or its assets, provided such party agrees to use the information only for that specific purpose.

- Regulatory and Legal Bodies: Federal or state regulatory bodies, government agencies, courts, law enforcement officials, or any other judicial body, as required by law or to protect our legal rights.

In the event of a merger, acquisition, or other sale or transfer of any or all of our assets, your Personal Information may be transferred to a buyer or other successor of our business. Should this occur, we may not be able to limit how such other party may use or further transfer your information.

5. Aggregated or Anonymized Information

We may share aggregated and/or anonymized information with any third parties at any time and without restriction to the extent such information cannot be linked back to any identifiable person.

6. Analytics and Advertising

We may use analytics services to help us understand how users access and use the Services. Portions of the Site use Google Analytics. To learn more about Google Analytics, visit <https://policies.google.com/technologies/partner-sites>. As part of this process, we may incorporate tracking technologies into our own Services (including our Sites and emails) as well as into our ads displayed on other sites and services. Some of these tracking technologies may track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you.

Third parties independently decide how to process your information. As we do not control these third parties, we encourage you to familiarize yourself with and consult their privacy policies and terms of use.

7. Safeguarding Information

We maintain reasonable safeguards designed to ensure the protection of your information from unauthorized access or use. However, while we strive to protect your information, we cannot guarantee or warrant the security of any information you transmit to our Sites.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Please notify us immediately if you believe your information with Paera has been compromised in any way.

8. Retention of Information

We will retain your Personal Information as long as permitted by our internal data retention policies, or applicable law, and as long as necessary in order to:

- Provide the Services to you.
- Use for any of the purposes permitted by this Privacy Policy.

- To comply with any legal or regulatory requirements.

9. Children's online privacy

Protecting children on the Internet is very important to Paera. For that reason, we do not knowingly solicit or collect Personal Information from anyone under the age of eighteen (18), and no part of the Sites is intended to attract anyone under the age of eighteen (18).

If you believe that a child under the age of eighteen (18) may have provided us with Personal Information, please contact us immediately at support@paera.com.

10. Do Not Track Signals

At this time, our Sites do not support Do Not Track ("DNT"). DNT is a privacy preference you can set in your web browser to indicate that you do not want certain information about your web page visits tracked and collected across the Sites. For more details, including how to turn on Do Not Track, visit <https://www.donottrack.us/>.

12. Data Transfer to the United States.

If you are outside of the United States and submit your Personal Information to us, please be advised that your information will be transferred to, stored, and processed in the United States. Please be advised that U.S. law may not offer the same privacy protections as the law of your jurisdiction. If you visit our Sites and use our Services, or contact us from outside of the United States. Where necessary, your Personal Information is also transferred to and stored on servers located in the European Union.

Where you contact customer support, your Personal Information may be accessed by individual service providers engaged by Tangem AG and located outside the United States and outside your country of residence, for the sole purpose of responding to your request. Some of those countries have not been recognised by the European Commission as providing an adequate level of data protection. Where such access occurs, we rely on the European Commission's Standard Contractual Clauses adopted under the EU General Data Protection Regulation. You may request a copy of these safeguards by contacting us at support@paera.com.

Please be advised that (i) any Personal Information you provide to us or that we automatically collect will be transferred to the United States; and (ii) by using our Sites or submitting Personal Information, you explicitly authorize its transfer to and subsequent processing in the United States in accordance with this Privacy Policy.

13. Choices About Your Personal Information

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

- Promotional Offers from the Company. If you do not wish to have your email address or contact information used by the Company to promote our own or third parties' products or services, you can opt-out by sending us an email stating your request to support@paera.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

14. [Contact Us](#)

If you have any questions about this Privacy Policy, our data practices, or our compliance with applicable law, please contact us: support@paera.com

Additional Disclosures for Nevada Residents

If you are a resident of Nevada, you may submit requests directing us not to sell Personal Information, pursuant to Nev. Rev. Stat. 603A.340, that the business has collected or will collect about you. Nevada residents may submit a request relating to our compliance with Nevada law by contacting us at support@paera.com

Shine the Light

If you are a resident of California, pursuant to California Civil Code 1798.83, you may request (i) a list of the categories of Personal Information disclosed by us to third parties during the immediately preceding calendar year for those third parties' own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write to us at support@paera.com and specify that you are making a "California Shine the Light Request." We may require additional information from you to allow us to verify your identity and are only required to respond to requests once during any calendar year.

Additional Disclosures for Brazilian Residents

If you are a resident of Brazil, you have certain rights regarding the processing of your Personal Information under Brazilian General Data Protection Law ("LGPD").

Subject to certain conditions, you have the right to obtain the following from us regarding the Personal Information that we collect and maintain about you: · confirmation of processing; · access to information; · correction of incomplete; · inaccurate or out-of-date information; · the anonymization, blocking or deletion of unnecessary or excessive data processed in noncompliance with the LGPD; · the portability to another provider; · the deletion of information processed; · information on the entities to whom we have disclosed the data and the consequences of not providing consent for the processing; and · the review of decisions made exclusively on the basis of the automated processing of your Personal Information.

You have the right to withdraw consent for processing of your Personal Information. Please be advised that if you withdraw consent to the processing of your Personal Information for the purposes described in this Privacy Policy, we may not be able to provide you with some, or all, of our Services. In certain situations, we may

continue to process your Personal Information after you withdraw your consent where may be required to do so, such as to comply with legal obligation to which we are subject.

We rely on the following lawful bases to process your Personal Information: · valid consent; to fulfill our legitimate interests or those of a third party, such as a contractual arrangement with you, unless your fundamental rights outweigh those interests; · when we are required to comply with regulatory or legal obligations or exercise our rights in legal, administrative, or arbitration proceedings.

If you are a resident of Brazil and have a concern about the processing of your Personal Information, you have the right to lodge a complaint with the National Data Protection Authority (ANPD). You may exercise your data subject rights or the withdrawal of your consent for processing by emailing us at support@paera.com