

PRIVACY POLICY

Effective Date: December 2024 – Version 3

At HODL OTC, your privacy is of paramount importance. This Privacy Policy outlines how we collect, use, and protect your personal information in compliance with the applicable data protection laws in South Africa (Protection of Personal Information Act, POPIA), Namibia, and Botswana. By using our services, you agree to the collection and processing of your data as described in this policy.

1. Information We Collect

HODL OTC collects and processes various types of personal information to ensure compliance with local laws and to provide the best service experience. The information we collect includes, but is not limited to:

- **Identification Information:** Full name, identity number (or passport number), date of birth, nationality, and proof of residence.
- **Contact Details:** Email addresses, phone numbers, and physical address details.
- **Financial Information:** Bank account details, source of funds, source of wealth, and transaction history.
- **Device and Usage Information:** IP addresses, device type, browser information, cookies, and other online identifiers, along with usage statistics.
- **Biometric Information:** Selfie images, voice recordings, and video recordings for identity verification during the account registration process.
- **Transaction Information:** Data related to cryptocurrency transactions, wallet addresses, transaction amounts, timestamps, and payment methods.

This data is collected directly from you, or from third-party sources such as financial institutions, third-party service providers, or public databases.

2. How We Use Your Information

HODL OTC processes your personal information for several key purposes:

- **Legal Compliance:** To comply with Know Your Customer (KYC) regulations, Anti-Money Laundering (AML) obligations, and other legal requirements that govern financial transactions within South Africa, Namibia, and Botswana.
- **Service Provision:** To create and manage your HODL OTC account, facilitate cryptocurrency transactions, and provide customer support.
- **Fraud Prevention and Security:** To detect and prevent fraudulent activities and ensure the security of the platform.
- **Operational Improvements:** To enhance our services, including analyzing customer behavior, improving website functionality, and optimizing service delivery.

We will only use your personal information for purposes that are compatible with the reasons for which we collected it.

3. Information Sharing and Third-Party Providers

HODL OTC may share your information with third parties in the following situations:

- **Service Providers:** Third-party partners that assist with providing our services, such as payment processors, identity verification providers, and fraud detection services.
- **Legal and Regulatory Compliance:** To comply with applicable legal requirements, we may disclose your information to law enforcement, regulatory bodies, or other authorities in South Africa, Namibia, or Botswana.
- **Internal Use and Affiliates:** Information may be shared within the HODL OTC group or with subsidiaries for operational purposes, such as customer support, service maintenance, or business analysis.

We do not sell your personal information to third parties for marketing purposes.



4. Data Protection and Security Measures

HODL OTC is committed to protecting your personal data from unauthorized access, disclosure, alteration, or destruction. We use a combination of administrative, technical, and physical security measures that comply with the relevant data protection laws of South Africa, Namibia, and Botswana.

However, no data transmission over the internet is completely secure, and while we strive to protect your information, we cannot guarantee absolute security against unauthorized access.

5. Your Rights Regarding Your Personal Information

As a user, you have several rights with respect to your personal information:

- **Right to Access:** You may request a copy of the personal information we hold about you, subject to reasonable fees or limitations set by applicable laws.
- **Right to Correction:** If your personal information is incorrect or incomplete, you have the right to request corrections.
- **Right to Deletion:** You may request that we delete your personal information, subject to legal obligations that may require us to retain certain data.
- **Right to Withdraw Consent:** If we process your personal information based on your consent, you can withdraw that consent at any time.
- **Right to Object:** You can object to the processing of your personal data for direct marketing purposes or other legitimate interests.

To exercise these rights, please contact our support team at [insert contact email or number].

6. Cookies and Tracking Technologies

HODL OTC uses cookies and other tracking technologies to improve your experience on our platform. Cookies are small text files that are stored on your device to enhance website functionality and user preferences. You can manage your cookie preferences in your browser settings, but please note that rejecting certain cookies may impact your experience.

- **Essential Cookies:** Necessary for the operation of the website, such as maintaining sessions and preferences.
- **Analytics Cookies:** Help us track user interactions and improve site performance.
- **Advertising Cookies:** Used to deliver targeted ads based on your browsing behavior.

For detailed information on cookies, please refer to our **Cookie Policy**.

7. Cross-Border Data Transfers

Your personal information may be transferred to, and processed in, countries outside South Africa, Namibia, or Botswana, including jurisdictions with varying levels of data protection. HODL OTC will take appropriate measures to ensure that your personal data is protected in line with this Privacy Policy, even when transferred internationally.

8. Retention of Personal Information

HODL OTC retains your personal information for as long as it is necessary to provide our services, comply with legal obligations, and protect our interests. Upon request, we will delete your personal information in accordance with the applicable data protection laws.

9. Updates to This Privacy Policy

This Privacy Policy may be updated from time to time. Users will be notified of significant changes via email or on the HODL OTC platform. We encourage you to review this policy periodically to stay informed about how we protect your data.

For any inquiries about this Privacy Policy, please contact us at [insert contact details].

This comprehensive version of your **Privacy Policy** is designed to meet the specific legal requirements of South Africa, Namibia, and Botswana, ensuring compliance with relevant data protection legislation. It addresses important elements such as data collection, user rights, third-party sharing, security, and retention while emphasizing your commitment to user privacy.

