

## Privacy Policy

### 1. General

1.1 At **Origami OG – FZCO** (“Origami”, “we”, “our”, “us” or the “Site”), we value the privacy of our users and are dedicated to protecting your personal information. Before using or accessing any websites operated by us, our application interfaces (“**APIs**”) and any services made available through the websites, software and APIs (collectively, the “**Services**”), you must read this Privacy Policy carefully to understand how we collect, use, and disclose your data.

1.2 All natural persons or entities who access our Sites and/or use our Services shall be deemed users of the Sites. For the purposes of this Privacy Policy, such users are referred to as “**you**”, and Origami and you together are referred to as the “**Parties**”, and individually as a “**Party**”.

1.3 Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Terms and Conditions.

### 2. Purposes of the Privacy Policy

2.1 This Privacy Policy sets out the types of data we may collect through your registration on the Sites or use of the Services. This includes personal data you provide, data we obtain from third parties, and data collected automatically, which identifies a person or relates to an identifiable person (“Personal Data”).

2.2 The Policy also explains how we store, process, and protect your Personal Data and describes your rights in relation to your data.

### 3. Your consent

3.1 By accessing or using the Sites or Services, you acknowledge that you have read and understood this Privacy Policy and that the processing of your Personal Data may be based on one or more of the following legal grounds:

- your freely given consent, where such consent is required;
- the necessity of processing for the performance of a contract or for taking steps at your request prior to entering into a contract;
- compliance with legal, regulatory, or supervisory obligations applicable to Origami, including but not limited to AML, CTF, sanctions, and financial compliance requirements;
- Origami’s legitimate interests, provided that such interests are not overridden by your fundamental rights and freedoms.

Where processing is based on legal or contractual necessity, withdrawal of consent shall not affect Origami's right to continue such processing to the extent permitted or required by law.

3.2 You acknowledge and agree that certain Personal Data may be processed without your consent where such processing is required for compliance with applicable laws, regulatory obligations, contractual performance, dispute resolution, fraud prevention, or enforcement of Origami's rights.

## **4. Information collected**

4.1 When you use our Sites, you agree that Origami may use cookies and other technologies to track your interactions, collect, and retain data such as your IP address, geolocation, device type, and browser information.

4.2 We may collect, process, and store Personal Data actively provided by you or automatically collected during your use of the Services, including:

- Identification Information - name and verification data to confirm your eligibility to use the Services.
- Institutional Information - for corporate or institutional users, company name, registration details, legal structure, address, and identification of beneficial owners.
- Financial Information - billing information, wallet addresses, transaction history, and associated identifiers.
- Service Information - logs, access data, browser type, IP address, session data and information regarding your interaction with APIs.
- Transaction and Wallet Information - on-chain data such as blockchain addresses, transaction IDs and network information.
- Correspondence Information - data from customer support communications, feedback, surveys and inquiries.

4.3 We may also collect information when you interact with integrated third-party services.

4.4 Origami may collect additional information as necessary to improve the functionality, security and performance of the Sites or as required by law or regulatory authorities.

4.5 If you access any third-party links from our Sites, you are subject to the Privacy Policy of that third party. Origami assumes no responsibility for their practices or content.

4.6 User Content, API requests, communications, logs, and other data generated through your use of the Services may contain Personal Data. Such data shall be

processed in accordance with this Privacy Policy and applicable data-protection laws.

## **5. Collection of Personal data**

5.1 We collect Personal Data through the following means:

- Information you provide directly (via account registration or emails);
- Information from third parties (affiliates, service providers);
- Information generated through your interactions with our APIs and platforms;
- Publicly available sources or blockchain data.

## **6. Transfer of Personal data**

6.1 Your Personal Data may be transferred to and stored on servers located outside your country of residence.

6.2 By using our Services, you consent to such transfers, even if those jurisdictions offer a lower level of data protection.

6.3 Origami ensures that appropriate contractual and organizational safeguards are implemented to maintain security and compliance.

## **7. Cookies Policy**

7.1 Cookies are small text files placed on your device to store information about your usage preferences, visit duration and browsing behavior.

7.2 We use both session cookies (which expire after your session ends) and persistent cookies (which remain on your device).

7.3 Cookies help us improve functionality, enhance security, detect suspicious activity, and comply with AML/CTF requirements.

7.4 You may disable cookies via your browser, but certain features of our Sites may not function properly as a result.

## **8. Use of Information**

8.1 We use your Personal Data for the following purposes:

- To provide, operate, and maintain our Services;
- To verify identity and maintain security;
- To enhance the Sites' functionality and performance;
- To conduct analytics and usage statistics;

- To personalize your experience;
- To process transactions and manage accounts;
- To communicate important updates, notices, and marketing (where permitted);
- To comply with applicable AML, CTF and sanctions regulations;
- To prevent, detect, and investigate fraudulent or unauthorized activities;
- To comply with court orders, legal requests, and regulatory obligations;
- To conduct sanctions screening, transaction monitoring, blockchain analytics, risk assessments, and compliance checks, including through the use of third-party compliance, analytics, or blockchain-monitoring service providers.

8.2 We may disclose Personal Data in the following cases:

- To our affiliates, subsidiaries, and contractors;
- To service providers that support operations (hosting, compliance, analytics, KYC);
- To legal and financial advisors;
- In connection with corporate restructuring or acquisition;
- To law enforcement or regulators when legally required.

8.3 We do not sell, lease, or otherwise make your Personal Data available to any third parties for marketing, promotional, or similar commercial purposes.

## **9. Protection of Personal data**

9.1. Origami applies appropriate technical and organizational measures to safeguard your data, including:

- Secure Socket Layer (SSL) encryption;
- Multi-factor authentication;
- Restricted internal data access;
- Firewalls and intrusion detection systems;
- Staff confidentiality and data security policies.

9.2. Although we employ strong security measures, no system is completely secure. Users are responsible for maintaining the confidentiality of their credentials.

9.3 In the event of a data breach, we will take prompt remedial action and notify affected users and authorities as required by law.

## **10. Data retention**

10.1 Origami retains Personal Data only for as long as necessary to fulfill the purposes described in this Privacy Policy, including the provision of Services,

compliance with legal and regulatory obligations, resolution of disputes, enforcement of agreements, and protection of Origami's legal rights.

10.2 Certain categories of Personal Data may be retained after account termination or deletion where retention is required or permitted by applicable laws, including AML, CTF, sanctions, tax, accounting, audit, or record-keeping requirements, or where necessary for the establishment, exercise, or defense of legal claims.

10.3 Upon expiration of applicable retention periods, Personal Data will be securely deleted or irreversibly anonymized.

## **11. Minors**

11.1 Our Services are not intended for individuals under the age of 18. If we discover that we have collected data from a minor, we will delete it immediately.

11.2 Parents or guardians who believe their child has submitted data should contact us at [info@origami.tech](mailto:info@origami.tech).

## **12. Modifications to the Privacy Policy**

12.1 Origami reserves the right to amend this Privacy Policy from time to time. Updates will be published on our website with the revised effective date.

12.2 Your continued use of the Sites constitutes acceptance of any changes.

## **13. Non-EU Targeting & Applicable Law**

13.1 Origami OG – FZCO is incorporated and operates under the laws of the United Arab Emirates. This Privacy Policy and any related matters shall be governed by and construed in accordance with the applicable data-protection laws of the United Arab Emirates, including Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data.

13.2 The Services are not specifically targeted at or intended for residents of the European Union or any particular jurisdiction. Origami does not intentionally market, advertise, or offer its Services to EU residents.

13.3 However, if you access the Sites or use the Services from within the European Union or another jurisdiction with specific privacy requirements, Origami will handle your Personal Data on a best-effort basis in accordance with generally accepted international data-protection standards and principles.

13.4 In the event of any conflict between applicable data-protection laws, the law that provides the higher level of protection to the individual shall prevail to the extent required.

## **14. Your Data Protection Rights**

Depending on your jurisdiction, you may have the right to:

- Access and receive a copy of your Personal Data;
- Request correction or deletion of your Personal Data;
- Object to or restrict processing;
- Withdraw consent at any time (without affecting prior lawful processing);
- Lodge a complaint with a relevant supervisory authority.

To exercise these rights, contact us.

### **Contact Information**

For any questions, complaints, or data protection requests, please contact:

ORIGAMI OG - FZCO

Email: [info@origami.tech](mailto:info@origami.tech)