

Privacy Policy

Last updated: 1 day of September,2025

This Privacy Policy explains how **EMCD FINTECH CORP** (“Operator”, “we”, “us”, “our”) or **EMCD** collects, uses, and protects personal data in connection with our crypto-related services and Site located at emcdfintech.com.



1. Contact information

The EMCD acts as the data controller for all processing activities described in this Policy.

If you have any questions about this Policy or your data protection rights, you may contact us at:

Email: support@emcd.io

Address: Ave Ricardo J Alfaro, PH Century Tower Office 317, Floor 3rd



2. Categories of Personal Data We Process

Depending on the interaction with our services, we may process the following personal data:

- **Identification data:** name, surname, username, contact details.
- **Communication data:** email address, phone number, messenger information.
- **Contractual data:** information necessary for contract negotiation, conclusion, and execution.
- **Technical data:** IP address, device information, browser type, and usage logs.
- **Marketing preferences:** subscription status, consent to receive promotional materials.



3. Purposes and Legal Bases of Processing

We process personal data only for specific and legitimate purposes:

Purpose	Description	Legal Basis
Feedback	To respond to inquiries, requests, or complaints.	Legitimate interest – ensuring effective communication.

Purpose	Description	Legal Basis
Contract conclusion and performance	To negotiate, conclude, and perform contracts for our services.	Contract necessity
Marketing mailing	To send newsletters, updates, and promotional offers.	Consent. You may withdraw your consent at any time.

If we receive unsolicited Personal Data about you, we will destroy or de-identify it, unless it is relevant to the purposes of collecting Personal Data as described in this Privacy Notice. We may store additional information about you if it is combined with other information that we are required or permitted to collect. In such cases, the information will be stored in the same manner as other Personal Data.



4. Data Retention

We store personal data only for as long as necessary:

- Feedback communications: up to 12 months.
- Contractual data: for the duration of the contract and statutory retention periods (e.g., up to 10 years for accounting).
- Marketing data: until you withdraw your consent or unsubscribe.



5. Recipients of Personal Data

Sharing of Personal Data

We may share your personal data with trusted third parties only where it is necessary to provide our services, comply with legal obligations, or support our business operations. All sharing is carried out with appropriate safeguards and in accordance with applicable data protection laws.

A. Service Providers

We engage third-party vendors who act as processors on our behalf. These may include:

- IT and cloud infrastructure providers;
- Customer support and communication platforms;
- Payment processors;
- Analytics and performance monitoring tools;
- Marketing and advertising partners (subject to your consent, where required).

These providers are contractually bound to process personal data solely for the purpose of delivering the contracted services and to implement adequate technical and organizational measures.

B. Blockchain Networks and Ecosystem Partners

For blockchain-based services, certain personal data may be shared with or recorded on decentralized networks. Please note:

- Data stored on public blockchains may be immutable and cannot always be modified or erased;
- Pseudonymized identifiers (e.g., wallet addresses, transaction hashes) may still qualify as personal data under certain laws;
- Partners may include protocol developers, validators, or ecosystem participants who enable blockchain functionality.

We apply measures such as encryption and pseudonymization to limit exposure of personal data on blockchain systems.

C. Financial Institutions and Payment Providers

We may share personal data with banks, payment service providers, or other financial institutions for the purposes of:

- Executing payments and transactions;
- Identity verification, fraud prevention, and security checks;
- Compliance with legal and regulatory requirements, including anti-money laundering (AML) and know-your-customer (KYC) obligations.

These institutions typically act as independent controllers and process data under their own regulatory frameworks and privacy policies.

D. Legal and Regulatory Authorities

We may disclose personal data when required by law or pursuant to valid legal requests from competent authorities, such as courts, regulators, or law enforcement bodies.

E. Other Disclosures

Your data may also be shared:

- In the context of a corporate transaction (e.g., merger, acquisition, or sale of assets);
- With your explicit consent, where the disclosure does not fall into the categories above.

6. International Data Transfers

Where data is transferred across borders, we ensure that appropriate safeguards are in place. These may include:

- Standard Contractual Clauses approved by the European Commission or other competent authority;
- Transfers to jurisdictions recognized as providing an adequate level of protection;
- Binding corporate rules or equivalent mechanisms ensuring consistent protection.

By using our services and providing your personal data, you explicitly consent to such international data transfers. You may withdraw this consent at any time; however, please note that in such case we may not be able to provide you with certain services.



7. Your Rights

You have the following rights under:

Right of access – You can ask us what personal data we hold about you and request a copy of it.

Right to rectification – If any of your personal data is incorrect or incomplete, you can ask us to correct it.

Right to erasure (“right to be forgotten”) – You can request that we delete your personal data, for example, if it is no longer needed for the purposes we collected it for.

Right to restrict processing – You can ask us to limit the way we use your personal data, e.g., while we are checking its accuracy or handling an objection you made.

Right to data portability – You can request that we give you your personal data in a commonly used electronic format (e.g., CSV file) so that you can reuse it or transfer it to another service provider.

Right to object – You can object to the processing of your data if we are relying on legitimate interests (including profiling). You can always object to your data being used for direct marketing.

Right to withdraw consent – Where we rely on your consent (e.g., for marketing emails), you can withdraw it at any time. This will not affect the lawfulness of processing before withdrawal.

Right to complain – You can file a complaint with your local data protection authority if you believe your rights are being violated.



8. Security Measures

EMCD strives to protect our Site and you from unauthorised access, alteration, disclosure or destruction (and other risks) of the Personal Data we collect and store. We take various measures to ensure information security, including encrypting communications on the Site; periodic review of our methods of collecting, storing and processing Personal Data; and restricting access to your Personal Data on a need-to-know basis to our employees and suppliers who are subject to strict contractual confidentiality obligations.



9. Cookies

Our website uses cookies and similar technologies to enhance user experience, analyze traffic, and support marketing activities.

- **What are cookies?** Cookies are small text files stored on your device when you visit our website. They help us recognize your browser and remember certain information.
- **Types of cookies we use:**
 - **Essential cookies** – required for basic website functionality.
 - **Analytics cookies** – to understand how visitors use our site (subject to your consent).
 - **Marketing cookies** – to deliver personalized content and promotions (subject to your consent).
- **Managing cookies:** You can configure your browser to reject cookies, delete stored cookies, or notify you when cookies are placed. Please note that disabling cookies may limit some functionalities of our website.
- **Legal basis:** We use essential cookies on the basis of our **legitimate interest**. For analytics and marketing cookies, we rely on your **consent**.



10. Children's Data

EMCD's services are not directed to children under the age of 18 (or the age of majority in your jurisdiction, if higher).

We do not knowingly collect, use, or process personal data from children.

- If you are under 18, you must not provide us with your personal data or use our services.
- If we discover that we have collected personal data from a child without proper parental or guardian consent, we will delete that information promptly.
- Parents or guardians who believe that their child may have provided personal data to us can contact us at support@emcd.io to request deletion.



11. Updates to This Policy

We may update this Privacy Policy from time to time. The updated version will be published on our website with a new “Last updated” date.