

DATA PROTECTION NOTICE ("NOTICE")

Last updated: August 26, 2025

The purpose of this Notice is to provide you with information on our use of your personal data in accordance with the British Virgin Islands Data Protection Act, 2021 and, in respect of any European Union ("EU") data subjects, the EU General Data Protection Regulation, (together, the "**Data Protection Legislation**").

In this Notice, "**we**", "**us**" and "**our**" refers to each of RiftWriter Company Limited and RazeStaker Company Limited (each a "**Company**"), and their affiliates and/or delegates.

If you are an individual user, this Notice will apply to you directly. If you are an institutional user that provides us with personal data on individuals connected to you for any reason in relation to your dealings with us, this Notice will be relevant to those individuals, and you should transmit this Notice to such individuals or otherwise advise them of its contents.

Your personal data will be processed by us, and by persons engaged by us. Under the Data Protection Legislation, you have rights, and we have obligations, with respect to your personal data. The purpose of this Notice is to explain how and why we, and persons engaged by us, will use, store, share and otherwise process your personal data. This Notice also sets out your rights under the Data Protection Legislation, and how you may exercise them.

YOUR PERSONAL DATA

By virtue of your dealings with us and any ongoing interactions with us and persons engaged by us, or by virtue of you otherwise providing us with your personal information or the personal information of individuals connected with you (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners, controlling persons or agents), you will provide us with certain personal information which constitutes "personal data" within the meaning of the Data Protection Legislation.

In particular, you will provide us with personal data within the forms and any associated documentation that you complete when applying to purchase, redeem, stake or unstake rcUSD tokens and/or to use the R25 protocol; when you provide it to us or our service providers in correspondence and conversations (including by email or any messaging site); when you enter transactions with respect to us; and when you provide us instructions.

We may also obtain personal data on you from other publicly accessible directories and sources. These may include websites; bankruptcy registers; tax authorities; governmental agencies and departments; regulatory authorities to whom we have regulatory obligations; credit reference agencies; sanctions screening databases; and fraud prevention and detection organisations, including law enforcement agencies.

Personal data includes personal information relating to you and/or any individuals connected with you such as: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your user activity.

HOW WE MAY USE YOUR PERSONAL DATA

As a data controller, we may collect, store and use your personal data for lawful purposes, including the following:

- where this is necessary for the performance of a contract or service, including:
 - administering or managing each Company;

- processing any purchase or redemption of rcUSD tokens;
- processing any staking or unstaking of rcUSD tokens;
- processing any payment of staking rewards;
- facilitating the provision of services to you or by each Company;
- facilitating the continuation or termination of the contractual relationship between you and each Company; and
- facilitating the transfer of funds, and administering and facilitating any other transaction, between you and each Company; and
- where this is necessary for compliance with applicable legal or regulatory obligations, including:
 - undertaking user due diligence, including anti-money laundering, counter-terrorist financing and counter-proliferation financing checks, including verifying the identity and addresses of our users (and, where applicable, their beneficial owners and controlling persons);
 - sanctions screening and complying with applicable sanctions and embargo legislation;
 - complying with requests from regulatory, governmental, tax and law enforcement authorities;
 - surveillance and investigation activities;
 - carrying out audit checks, and instructing our auditors;
 - maintaining statutory registers; and
 - preventing and detecting fraud.

Each Company continues to be a data controller even where it has engaged service providers and other third parties to perform certain activities on the Company's behalf.

SHARING YOUR PERSONAL DATA

Each Company may share your personal data with its affiliates and delegates. In certain circumstances we may be legally obliged to share your personal data and other financial information with respect to your dealings with us with relevant regulatory authorities, such as the British Virgin Islands Financial Services Commission or the Virgin Islands International Tax Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities and other applicable regulatory authorities.

Each Company's respective affiliates and delegates may process your personal data on the Company's behalf, including with its banks, accountants, auditors and lawyers which may be data controllers in their own right. Our service providers are generally processors acting on our instructions. Additionally, a service provider may use your personal data where this is necessary for compliance with a legal obligation to which it is directly subject (for example, to comply with applicable law in relation to anti-money laundering, counter-terrorist financing and counter-proliferation financing or where mandated by a court order or regulatory sanction). The service providers, in respect of this specific use of personal data, may be deemed to be acting as a data controller.

In exceptional circumstances, we will share your personal data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened) in any country or territory.

SENDING YOUR PERSONAL DATA INTERNATIONALLY

Due to the international nature of each Company's business, your personal data may be transferred to jurisdictions that do not offer equivalent protection of personal data as provided for under the Data Protection Legislation. In such cases, we will process your personal data or procure that it be processed in accordance with the requirements of the Data Protection Legislation.

RETENTION AND DELETION OF YOUR PERSONAL DATA

We will keep your personal data for as long as it is required by us. For example, we may require it for our legitimate business purposes, to perform our contractual obligations, or where law or regulation obliges us

to. We will generally retain your personal data throughout the lifecycle of your relationship with us. Some personal data will be retained after your relationship with us ends. We expect to delete your personal data (at the latest) once there is no longer any legal or regulatory requirement or legitimate business purpose for retaining your personal data.

YOUR RIGHTS

You have certain data protection rights, including the right to:

- be informed about the purposes for which your personal data are processed;
- access your personal data;
- stop processing or not begin processing your personal data for direct marketing purposes; and
- have incomplete, inaccurate, misleading and excessive personal data corrected.

CONTACT US

We are committed to processing your personal data lawfully and to respecting your data protection rights. Please contact us at privacy@r25.xyz, marking your communication "Data Protection Enquiry", if you have any questions about this Notice or the personal data we hold about you.