

PRIVACY POLICY FOR MULYANTARAN COIN

Introduction

This Privacy Policy (“Policy”) explains how Mulyantaran (the “Company,” “we,” “our,” or “us”) collects, uses, discloses, and safeguards your personal information when you access or use our website, platform, products, and services (the “Services”). By using the Services, you consent to the practices described in this Policy.

1. General Information

- 1.1. This section provides background information regarding Mulyantaran and its \$MULY token. It is for information purposes only and does not create contractual rights in \$MULY tokens. The \$MULY token is a utility token used within the Mulyantaran ecosystem and does not represent equity, dividends, or profit-sharing rights.

2. Information We Collect

- 2.1. Personal Identification Data: Name, nationality, date of birth, contact details, government-issued identification documents, and other KYC/AML information.
- 2.2. Financial Data: Wallet addresses, transaction history, bank details (if required for fiat integration), payment records, and investment preferences.
- 2.3. Usage Data: IP addresses, device identifiers, browser type, and activity on the platform.
- 2.4. Institutional Onboarding Data: For large-scale investors or entities, information such as incorporation certificates, beneficial ownership details, escrow arrangements, and AUM commitments, and authorised signatories.
- 2.5. Insurance-related data: Information necessary to facilitate capital protection and insurance-backed products, including claims details.

3. Website Cookies and Tracking Technologies

- 3.1. We use cookies and similar tracking technologies to enhance your experience, analyse traffic, and improve the Services. Cookies are small files stored on your device that enable us to recognize your browser and capture usage information.

4. Types of Cookies We Use

- 4.1. Essential Cookies: Required for the functioning of the website and Services.
- 4.2. Analytics Cookies: Help us understand how users interact with our platform.

- 4.3. Preference Cookies: Remember user settings and preferences.
- 4.4. Marketing Cookies: Used to deliver relevant advertisements and measure campaign effectiveness.
- 4.5. You can manage or block cookies through your browser settings, but doing so may affect your ability to use certain features of the website.

5. Third-Party Services

- 5.1. We may use third-party services, such as analytics providers, payment processors, escrow agents, and insurance partners. These third parties may collect or process data on our behalf in accordance with their own privacy practices.

6. How We Use Your Information

- 6.1. The information may be used for the following purposes:
 - 6.1.1. Verify identity and comply with KYC/AML obligations.
 - 6.1.2. Facilitate transactions, token allocations, and investment services.
 - 6.1.3. Provide access to features such as Time Zone Arbitrage Vaults, Smart DCA, goal-based baskets, Fixed APR products, and insurance-backed products.
 - 6.1.4. Administer institutional onboarding processes and manage escrow or capital commitments.
 - 6.1.5. Deliver communications, reporting dashboards, and investor updates.
 - 6.1.6. Detect, investigate, and prevent fraud or unauthorised activities.
 - 6.1.7. Fulfil regulatory, tax, and legal obligations.
 - 6.1.8. To facilitate insurance-backed capital protection and liaise with insurance partners for claims processing.
 - 6.1.9. To comply with institutional onboarding and escrow-related obligations.

7. Information Sharing and Disclosure

- 7.1. We may disclose your data to:
 - 7.1.1. Affiliates and Service Providers: including technology, compliance, auditing, and payment service providers.
 - 7.1.2. Insurance Partners: to administer capital protection and claims.
 - 7.1.3. Institutional Partners and Escrow Agents: to fulfill investment commitments.
 - 7.1.4. Regulatory Authorities: where required by law or regulation.

7.2. We do not sell your personal data to third parties.

8. Data Security

8.1. We implement technical, organisational, and administrative safeguards to protect your personal data against unauthorised access, alteration, disclosure, or destruction. We also require institutional partners, escrow agents, and insurance providers to adopt industry-standard measures when handling your information. However, no system is fully secure, and we cannot guarantee absolute security.

9. Your Rights and Choices

9.1. Certain rights, such as the right to erasure, may be restricted where retention is required under applicable financial regulations or anti-money laundering laws. Subject to such limitations, and depending on your jurisdiction, you may have the following rights

9.1.1. Right to Access

You have the right to access any personal information we hold about you. For data stored on the platform (such as wallet addresses and transaction history). If we hold any additional personal information (such as email addresses or support correspondence), you may request access to this data.

9.1.2. Right to Erasure

You have the right to request the deletion of personal data we hold, including personal information provided for customer support or account services. However, please note that data recorded on the blockchain (e.g., wallet addresses, transaction history) cannot be altered or deleted due to blockchain technology. For personal data not stored on the blockchain, we will comply with your request unless we are legally required to retain the information. We may also retain minimal identifying data where strictly necessary to demonstrate compliance with our regulatory obligations

9.1.3. Data Portability

You may request a copy of your personal information in a structured, commonly used, and machine-readable format, to the extent technically feasible and legally permissible.

9.1.4. Withdrawal of Consent

If you have provided consent for specific data processing activities, you may withdraw that consent at any time by contacting us. This will not affect the lawfulness of data processing based on your consent before its withdrawal.

9.1.5. Information Sharing and Disclosure

We do not sell, rent, or share your personal information with third parties, except in the following circumstances:

- a) Legal Compliance: We may disclose personal information in response to lawful requests from government authorities, law enforcement, or other third parties where required by law.
- b) Third-Party Service Providers and Partners: We may share limited personal data with third-party providers and partners, including insurance partners (to administer capital protection and process claims) and escrow agents (to facilitate institutional onboarding and manage committed funds). These entities are contractually required to apply industry-standard safeguards, process your data only for the purposes specified by us, and are prohibited from using your data for unrelated or unauthorised purposes.

10. International Data Transfers

- 10.1. By using our Services, you consent to the transfer of your personal data outside your jurisdiction, including to Georgia, which is our primary jurisdiction of operation. Data protection laws in these jurisdictions may differ from your home country.

11. Data Retention

- 11.1. KYC/AML data will be retained for a minimum of five (5) years after the end of the business relationship, or longer if required by financial regulations.
- 11.2. Blockchain transaction data is permanent and cannot be deleted.
- 11.3. Other personal data will be retained for the duration of your account's existence and a reasonable period thereafter to comply with obligations and resolve disputes.

12. Modifications to this Policy

- 12.1. We may amend this Policy from time to time. Updates will be posted on our website, and material changes will be notified to users. Continued use of the Services after updates constitutes acceptance of the revised Policy.

13. Minors

- 13.1. Our Services are not directed toward individuals under the age of 18, and we do not knowingly collect personal information from minors.

13.2. If a minor provides us with their information without the consent of their parent or guardian, we will ask the parent or guardian to contact us for the purpose of deleting that information.

13.3. If we become aware that we have collected such data, we will take steps to delete it promptly.

14. Contact Information

For questions or concerns about this Privacy Policy or our data practices, please contact us at:

Mulyantaran Compliance Team

Email:

Registered Office: Georgia