

PART B — PRIVACY NOTICE

Customer-facing — intended for publication on the Vaultic website and app

FOR PUBLICATION

This Part is written to be read by customers. It may be lifted and published as Vaultic's Privacy Notice / Privacy Policy on the website and in the application. Bracketed items must be completed before publication. The remainder of this Pack (Parts A, C, D, E) is internal and must not be published.

B1. Who We Are

The Vaultic Global Ltd ("Vaultic", "we", "us") operates a platform for cryptocurrency trading and gift card redemption. We are registered in Nigeria (RC: 8817639) and are the controller of the personal data described in this notice. This notice explains what personal data we collect, why, how we use and protect it, and the rights you have over it.

B2. The Data We Collect

Category	Examples
Identity data	Full name, date of birth, National Identification Number (NIN), Bank Verification Number (BVN), and your photograph / liveness capture.
Contact data	Residential address, email address, and phone number.
Verification data	Proof of address and the results of identity and sanctions/PEP screening checks.
Transaction data	Records of your crypto trades, gift-card redemptions, and related payments.
Technical data	Device, log, and usage information when you access our platform.
Communications	Your messages to our support and service teams.

B3. Why We Use Your Data and Our Lawful Basis

Purpose	Lawful Basis
To create and operate your account, and to provide our services	Performance of our contract with you
To verify your identity and meet anti-money-laundering (AML) and other legal duties	Compliance with a legal obligation
To detect and prevent fraud, and to keep our platform secure	Our legitimate interests
To send you marketing, where you have opted in	Your consent (which you may withdraw at any time)

B4. How We Share Your Data

We do not sell your personal data. We share it only where necessary: with identity-verification and screening providers to confirm who you are; with regulators and law-enforcement or competent authorities where we are legally required to (for example, the NDPC, NFIU, SCUML, CBN, or EFCC); and with technology providers who host and support our platform under strict data protection contracts. Any transfer of your data outside Nigeria is made only with appropriate safeguards in place.

B5. How Long We Keep Your Data

We keep your data only as long as necessary for the purposes above or as the law requires. In particular, because we are legally obliged to, we retain your identity (KYC) records for at least ten years after your account is closed. Other records

are kept for the periods set out in our internal retention schedule. When data is no longer needed, we securely delete or destroy it.

B6. How We Protect Your Data

We apply technical and organizational security measures — including encryption, strict access controls, and continuous monitoring — to protect your data against loss, misuse, and unauthorized access. If a data breach occurs that is likely to put your rights at high risk, we will notify you and the Nigeria Data Protection Commission as required by law.

B7. Your Rights

You have the right to be informed about how we use your data, to access a copy of it, to have inaccurate data corrected, to ask us to delete it, to restrict or object to processing, and to receive your data in a portable format. You also have rights concerning automated decisions. Some rights are limited by law — for example, we cannot delete KYC records we are legally required to keep. To exercise any right, contact our Data Protection Officer using the details below; we will respond within 30 days.

B8. Cookies

Our website and app use cookies and similar technologies to make the platform work, keep it secure, and understand how it is used. You can control non-essential cookies through your browser or our cookie settings. [Link to full Cookie Policy, if published separately.]

B9. Contact and Complaints

If you have any question about this notice or wish to exercise your rights, contact our Data Protection Officer at privacy@vaulticapp.com. If you believe we have not handled your data properly, you may complain to us and you have the right to lodge a complaint with the Nigeria Data Protection Commission (NDPC).

[2/9/26] · [1, Obi Okoye Street, Ogui Road, Enugu, Nigeria] · This notice may be updated from time to time; the current version is always available on our platform.