

PRIVACY STATEMENT – Onboarding Information

1. Introduction. CyberGym is committed to protecting and respecting your privacy. This Privacy Statement explains how we collect, use, disclose, and retain personal information as part of our onboarding Know Your Counterparty ("KYC") process.

2. Purpose of Processing. We collect and process personal information for the purposes of our onboarding KYC process. This enables us to identify our contractual counterparties and their ultimate beneficial owners ("UBOs"), ensure compliance with applicable sanctions and anti-money laundering ("AML") regimes, and mitigate legal and business risks.

3. Voluntary Provision of Personal Information. Providing personal information is not legally required; however, failure to do so may result in our inability to contract with the legal entity you control or represent due to our internal compliance controls and risk management policies.

4. Legal Basis for Processing. We process personal information on the basis of our legitimate interests, which include:

- Identifying our contractual counterparties and their UBOs;
- Ensuring compliance with applicable sanctions and AML regulations; and
- Mitigating legal and business risks.

5. Personal Data Collected. As part of our KYC process, we collect the following personal information of UBOs or managing directors:

- Full name;
- Gender;
- Date of birth;
- Nationality;
- Business email address;
- Name of and relationship to (or role in) the business entity.

Note: we request a passport scan to collect and verify full name, birth month and year, nationality, and gender, while redacting other information such as the exact day of birth, national ID, and full date of issuance. **As an alternative to providing us with a passport scan**, we can arrange for the document to be presented to our legal team via a video conference. This can be scheduled through the business contact within our company, or our privacy officer at: privacy@cybergym.com

6. Access to Personal Information. Access to your personal information is restricted to:

- Our legal counsels; and
- Our risk management team.

7. Retention Period. We retain personal information for the duration of the contractual relationship and for a period of seven (7) years thereafter, in accordance with our internal compliance policies and applicable legal requirements.

8. Contact Information. If you have any questions regarding this Privacy Statement or our data processing practices, please contact us at privacy@cybergym.com

By providing your personal information, you acknowledge that you have read and understood this Privacy Statement.