



## Privacy Policy

January 2026

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## 1. Introduction

This Privacy Policy, together with our Terms of Business and other essential documents, governs the collection, use, disclosure, and protection of Personal Information by **Multi Asset Solutions Digital Payments Limited**, trading as **MAS Digital**.

As used in this Privacy Policy, “**MAS Digital**,” “**we**,” “**us**,” or “**our**” refers to **Multi Asset Solutions Digital Payments Limited**, a company registered in **Canada** under company number **BC1370632**, with its registered address at **600-1285 West Broadway, Vancouver, British Columbia, Canada, V6H 3X8**. MAS Digital is registered with the **Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)** as a **Money Services Business (MSB)** under registration number **M22527201**.

We are committed to safeguarding the privacy, confidentiality, and security of your Personal Information. This Privacy Policy is provided in accordance with applicable Canadian privacy laws, including the **Personal Information Protection and Electronic Documents Act (PIPEDA)** and applicable provincial privacy legislation (collectively, **Applicable Privacy Laws**).

For the purposes of this Privacy Policy, “**Personal Information**” means information about an identifiable individual, including but not limited to name, contact details, identification documents, financial information, and transaction history.

By accessing or using MAS Digital’s website or services, you acknowledge that you have read and understood this Privacy Policy and consent to the collection, use, and disclosure of your Personal Information as described herein. If you do not agree, you must discontinue use of our services.

## 2. Accountability

MAS Digital is responsible for Personal Information under its control and has implemented policies and procedures to ensure compliance with Applicable Privacy Laws. We are accountable for Personal Information transferred to third parties for processing and require such parties to provide a comparable level of protection through contractual or other safeguards.

### 3. Personal Information We Collect

Depending on the nature of our relationship with you and regulatory requirements, we may collect the following categories of Personal Information:

- Name, residential address, and contact details (email address, telephone number);
- Date of birth;
- Gender (where permitted by law);
- Employment and professional information;
- Tax identification numbers or equivalents;
- Electronic identifiers (IP address, device identifiers, browser type and version, time zone, and location data);
- Government-issued identification documents (passport, driver's licence, national ID);
- Proof of address documentation;
- Photographic images or other identification data required for verification;
- Transaction data and account activity history;
- Financial information, including virtual asset wallet addresses and bank account details;
- Information relating to source of funds and source of wealth;
- Marketing and communication preferences;
- Any other information required to comply with legal, regulatory, or contractual obligations.

### 4. How We Collect Personal Information

We collect Personal Information through the following means:

- Directly from you when you register for an account, use our services, or communicate with us;
- Automatically through your use of our website and systems (e.g., cookies and similar technologies);
- From third-party service providers such as identity verification vendors, compliance and sanctions screening providers, financial institutions, or publicly available sources, where permitted by law.

## 5. How We Use Your Personal Information

We use Personal Information only for purposes that a reasonable person would consider appropriate in the circumstances, including:

- Verifying your identity and conducting customer due diligence;
- Providing, operating, and maintaining our services in accordance with our Terms of Business;
- Complying with **FINTRAC**, anti-money laundering (AML), counter-terrorist financing (CTF), and other regulatory obligations;
- Processing transactions and maintaining accurate records;
- Communicating with you regarding your account, services, updates, and important notices;
- Detecting, preventing, and investigating fraud, security incidents, and unlawful activity;
- Improving our services, systems, and customer experience;
- Meeting legal, regulatory, audit, and reporting requirements.

## 6. Consent

We collect, use, and disclose Personal Information with your knowledge and consent, except where consent is not required or is otherwise permitted under Applicable Privacy Laws (e.g., to comply with legal obligations or prevent fraud). Consent may be express or implied, depending on the circumstances and sensitivity of the information. You may withdraw your consent at any time by contacting us, subject to legal or contractual restrictions and reasonable notice. Withdrawal of consent may affect our ability to provide services.

## 7. Disclosure of Personal Information

We may disclose your Personal Information to the following parties, where necessary and permitted by law:

- Government authorities, regulators, and law enforcement agencies, including FINTRAC;
- Financial institutions, payment processors, and digital asset service providers;

- Third-party service providers supporting our operations (e.g., identity verification, sanctions screening, IT hosting, customer communication platforms);
- Professional advisors, auditors, and legal counsel;
- Business partners involved in the delivery of our services.

All third parties are required to safeguard Personal Information and use it only for authorized purposes.

## 8. Cross-Border Transfers

Your Personal Information may be stored or processed outside Canada, including in jurisdictions with different data protection standards. In such cases, we take reasonable steps to ensure that your Personal Information receives a comparable level of protection through contractual safeguards and due diligence.

## 9. Data Retention

We retain Personal Information only for as long as necessary to fulfill the purposes identified in this Privacy Policy or to comply with legal and regulatory requirements.

As a general rule, customer information is retained for **a minimum of five (5) years** following account closure in accordance with AML and regulatory obligations. Once no longer required, Personal Information is securely destroyed, anonymized, or de-identified.

## 10. Cookies and Similar Technologies

We use cookies and similar technologies to operate our website, enhance functionality, analyze usage, and improve user experience. These technologies typically collect technical and usage data rather than directly identifying you. Additional details are available in our **Cookie Policy** on our website.

## 11. Security Safeguards

We employ reasonable administrative, technical, and physical safeguards to protect Personal Information against loss, theft, unauthorized access, disclosure, alteration, or destruction.

Access to Personal Information is restricted to employees, contractors, and service providers who require it for legitimate business purposes and who are subject to confidentiality obligations. We maintain incident response procedures and will notify affected individuals and authorities of a data breach where required by law.

## 12. Your Rights Under Canadian Privacy Law

Subject to Applicable Privacy Laws, you have the right to:

- Request access to your Personal Information and obtain copies;
- Request correction of inaccurate or incomplete Personal Information;
- Withdraw consent, subject to legal or contractual limitations;
- Inquire about our privacy practices and safeguards;
- Challenge our compliance with Applicable Privacy Laws.

Requests may be made using the contact details below. We may require identity verification before responding. Fees may apply for excessive or additional requests, as permitted by law.

## 13. Contact Information

For questions, requests, or complaints regarding this Privacy Policy or our privacy practices, please contact:

**Support team**

**Multi Asset Solutions Digital Payments Limited (MAS Digital)**

600-1285 West Broadway

Vancouver, British Columbia, Canada, V6H 3X8

Email: [support@mas-digital.io](mailto:support@mas-digital.io)

You also have the right to file a complaint with the **Office of the Privacy Commissioner of Canada** or the applicable provincial privacy authority.

## 14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in legal requirements or our information practices. The most current version will be published on our website, and the effective date will be updated accordingly.