

Privacy Policy

Effective date: 12 August 2026

Introduction

Quantum Chain Pte Ltd (“Quantum Chain,” “we,” “our,” or “us”) operates Qustody, a non-custodial digital asset orchestration, custody infrastructure, and tokenization platform. Quantum Chain Pte Ltd is based in Singapore and is the principal commercial entity and data controller for Qustody unless we tell you otherwise at the time your information is collected.

This Privacy Policy explains how we collect, use, store, disclose, transfer, and protect personal information when you visit <https://www.qustody.io>, create or use a Qustody account, access the Qustody dashboard or API, use EnQlave, or otherwise interact with Qustody.

For purposes of this Privacy Policy, “personal information” means information relating to an identified or identifiable individual. It does not include information that has been anonymized or aggregated so that it can no longer reasonably be linked to an identifiable individual, subject to applicable law.

Quantum Chain generally acts as the data controller when it determines why and how personal information is processed for its own purposes. When we process personal information on behalf of an institutional or organizational customer, we generally act as a data processor or service provider and that customer acts as the data controller.

Applicable Data-Protection Laws

Depending on the relevant processing activity and your location, our handling of personal information may be subject to the Singapore Personal Data Protection Act 2012 (“Singapore PDPA”) and, where their territorial scope applies, the GDPR, UK GDPR, or other applicable data-protection laws.

References to a particular law in this Privacy Policy do not mean that the law applies to every user or every processing activity. Where local law provides additional rights or imposes additional requirements, we will apply those rights and requirements to the extent required.

Information We Collect

Account and Organization Information

When you create or use a Qustody account, we may collect:

- Your name and work email address
- Your organization's name
- Whether the account is registered for a business or an individual
- Account credentials, including a securely hashed version of your password
- Your role, permissions, and organization membership
- Email-verification and account-verification status
- Subscription, billing, and service-plan information

Identity and Compliance Information

Qustody uses identity and compliance checks as part of its onboarding and transaction-screening processes. Depending on whether you register as an individual or an organization, we or our verification providers may collect:

- Identification and contact information
- Date of birth, nationality, and residential or registered address
- Government-issued identity documents
- Corporate registration and ownership information
- Information concerning directors, authorized representatives, controllers, and beneficial owners
- Photographs, selfies, facial images, liveness information, and face-comparison results used for identity verification
- KYC, KYB, sanctions, AML, fraud, and transaction-screening results
- Additional information required to satisfy applicable legal, regulatory, security, or risk-management requirements

Some identity-verification information may be collected directly through third-party verification providers. Where a provider processes this information on our behalf, it must process the information in accordance with our documented instructions, our agreement with that provider, and applicable law.

Platform, Wallet, and Transaction Information

When you use Qustody, we may process information relating to:

- Vaults, wallets, public addresses, and public keys
- Cryptographic ownership proofs
- Users, roles, approval workflows, and policy settings
- Allow-lists, velocity limits, and transaction-approval rules
- Transaction instructions, status, history, and related blockchain records
- Token deployments and token lifecycle actions, including minting, burning, and pausing
- Webhooks, API activity, and integration records
- Compliance-screening decisions
- Audit logs and records of activity conducted within your organization

Qustody is non-custodial. Private keys generated or stored using your systems, hardware, HSM, remote-signing environment, or Enclave remain under your control. Qustody does not

require custody of those private keys to provide its orchestration, policy, screening, and transaction-broadcasting services.

Public blockchain transactions may be permanently recorded on the relevant blockchain and may remain publicly accessible independently of Qustody. Quantum Chain cannot alter or delete information recorded on a public blockchain that it does not control.

Technical and Usage Information

We may automatically collect:

- IP address
- Browser and device type
- Operating system
- Login and session information
- Authentication attempts and security events
- Pages and platform features accessed
- API requests and integration activity
- Referring and exit pages
- Dates and times of access
- Error reports, performance data, and diagnostic information

Sessions and platform actions may be recorded in Qustody's tamper-evident audit logs for security, compliance, and organizational oversight.

Communications and Contact Information

When you contact us, request a demonstration, submit an enquiry, or communicate with our support or sales teams, we may collect:

- Your name
- Your work email address
- Your company name
- Your area of interest
- Details of your enquiry
- Support requests and correspondence

Information Obtained From Other Sources

We may receive personal information from:

- Your employer, organization, or an authorized Qustody administrator
- Identity-verification, business-verification, sanctions, fraud-prevention, and transaction-screening providers
- Public blockchains and blockchain analytics providers
- Public corporate registers, sanctions lists, regulatory databases, and other lawful public sources
- Integration partners and service providers acting on our behalf

Where required by applicable law, we will provide any additional notice required when personal information is obtained from a source other than you.

How We Use Information

We may use personal information to:

- Create, verify, maintain, and administer Qustody accounts
- Provide the Qustody dashboard, API, EnQlave, and related services
- Perform KYC, KYB, AML, sanctions, fraud, and transaction screening
- Verify wallet ownership and transaction authorization
- Apply organizational policies, permissions, and approval workflows
- Process and broadcast authorized transaction instructions
- Maintain audit logs and provide compliance records
- Monitor service performance, availability, and security
- Prevent unauthorized access, fraud, misuse, and other prohibited activity
- Provide customer support and respond to enquiries
- Administer subscriptions, billing, and contractual arrangements
- Analyze and improve Qustody's services and user experience
- Send service notices, security alerts, and product updates
- Send marketing communications where permitted by law or with your consent
- Enforce our agreements and policies
- Comply with applicable legal and regulatory obligations
- Establish, exercise, or defend legal claims

Legal Bases for Processing

Where the Singapore PDPA, General Data Protection Regulation (EU) 2016/679 ("GDPR"), the UK GDPR, or similar laws apply, we process personal information based on consent or another basis or exception permitted by the applicable law. This may include processing necessary to provide requested services, perform a contract, comply with legal obligations, protect information security, prevent or detect fraud, or establish, exercise, or defend legal claims.

Where we process information on behalf of a Qustody customer, that customer is responsible for identifying and communicating the legal basis applicable to its processing activities.

Automated Processing and Review

Qustody uses automated systems to apply organizational policies, verify transaction conditions, screen activity for compliance and security risks, and prevent unauthorized or prohibited transactions.

These systems may compare account or transaction activity against approval thresholds, allow-lists, velocity limits, screening results, security signals, and policies configured by your

organization. They may flag, delay, reject, or prevent an action from proceeding when a requirement is not satisfied or a risk is detected.

Unless we inform you otherwise, Qustody does not use solely automated processing to make decisions about individuals that produce legal or similarly significant effects. Where such processing occurs and applicable law requires, you may request information about the decision, express your point of view, contest the outcome, and request appropriate human review by contacting us.

Information Processed for Customers

Where Qustody processes personal information on behalf of an institutional or organizational customer, that customer may determine why and how the information is processed.

In these circumstances, Quantum Chain acts as a service provider or data processor, while the customer generally acts as the data controller. Requests concerning information controlled by a Qustody customer should ordinarily be directed to that customer.

Authorized administrators of your organization may be able to access account activity, transaction records, audit logs, roles, permissions, and other information associated with your use of the organization's Qustody account.

Data Protection and Security

Quantum Chain is committed to processing personal information lawfully, fairly, and transparently.

We collect personal information only for specified and legitimate purposes, limit collection to information reasonably necessary for those purposes, take reasonable steps to maintain its accuracy, and retain it only for as long as necessary for the relevant purposes or applicable legal and regulatory requirements.

We use administrative, technical, and organizational safeguards designed to protect personal information against unauthorized access, alteration, loss, misuse, or disclosure. These safeguards may include encryption, access controls, role-based permissions, authentication controls, audit logging, network security, monitoring, business-continuity measures, and secure development practices.

We review our safeguards and update them where appropriate based on the nature of the information processed and the associated risks. We also maintain procedures for assessing and responding to personal-data incidents and will notify regulators, customers, or affected individuals where required by applicable law.

No internet-based service or method of electronic storage is completely secure. We therefore cannot guarantee absolute security.

Cookies and Local Storage

Qustody may use cookies, browser storage, and similar technologies to:

- Maintain authenticated sessions
- Protect accounts and prevent misuse
- Remember user preferences
- Operate and improve the website and platform
- Understand service performance and usage

For example, the Qustody website may use local browser storage to remember your selected display theme.

Some cookies and browser-storage technologies are essential to provide and secure Qustody. Where required by applicable law, we will request your consent before using non-essential cookies or similar technologies, including optional analytics, and provide a means to withdraw that consent.

You can also control cookies through your browser settings. Disabling essential cookies or browser storage may prevent certain Qustody features from working correctly.

Third-Party Service Providers

We may disclose personal information to service providers that help us operate Qustody, including providers of:

- Cloud hosting and infrastructure
- Identity and business verification
- AML, sanctions, fraud, and transaction screening
- Authentication and cybersecurity
- Email and customer communications
- Billing and payment processing
- Analytics, diagnostics, and service monitoring
- Professional, legal, accounting, and audit services

We use **Shufti Pro** as our third-party provider for Know Your Customer (KYC) and Know Your Business (KYB) verification. Where verification is required, we may provide relevant personal or business information to Shufti Pro solely to verify identity or business details and perform related compliance, fraud-prevention, and security checks.

Our relationship with Shufti Pro is governed by a data-processing agreement. For these verification services, Shufti Pro processes personal information on our behalf and in accordance with our documented instructions and agreement. We do not instruct or authorize Shufti Pro to use this information for independent marketing or unrelated commercial purposes. Shufti Pro may process or retain information only as necessary to provide the verification services or comply with applicable legal and regulatory obligations.

Other service providers may process information only as necessary to perform services for us and are subject to contractual, confidentiality, or legal obligations.

Information about our material service providers and subprocessors may be made available to customers upon request, subject to appropriate confidentiality and security restrictions.

We may also disclose information:

- When required by law, regulation, court order, or lawful government request
- To protect Quantum Chain, our customers, users, or the public
- To investigate fraud, security incidents, or violations of our agreements
- In connection with a merger, financing, restructuring, acquisition, or sale of all or part of our business
- With your consent or at your direction

We do not sell personal information.

International Data Transfers

Quantum Chain is based in Singapore and may use service providers or infrastructure located in other countries. Your personal information may therefore be transferred to, stored in, accessed from, or processed in jurisdictions outside your country of residence.

Where required, we use safeguards designed to provide an appropriate or comparable level of protection for international transfers. Depending on the jurisdictions involved, these safeguards may include transfer-risk assessments, and supplementary technical and organizational measures. We apply the transfer requirements of the Singapore PDPA and other applicable laws to the extent relevant to a transfer.

Data Retention

We retain personal information only for as long as reasonably necessary to:

- Provide Qustody's services
- Maintain security and audit records
- Fulfil contractual commitments
- Comply with applicable legal, tax, accounting, AML, and regulatory obligations
- Resolve disputes
- Enforce our agreements
- Establish, exercise, or defend legal claims

Retention periods depend on the type and sensitivity of the information, the purpose for which it was collected, the associated risks, customer instructions, and applicable legal requirements. When personal information is no longer required, we delete or anonymize it in accordance with our retention procedures, unless continued retention is required or permitted by law.

Some blockchain records cannot be altered or deleted by Quantum Chain because they are maintained independently on a distributed ledger.

Marketing Communications

We send promotional or marketing communications only where permitted by applicable law. Where consent is required, we will obtain it before sending the communication.

You may opt out at any time by using the unsubscribe option provided in the communication or by contacting us. You also have the right to object at any time to the use of your personal information for direct marketing.

If you opt out of marketing communications, we may continue to send essential security, account, transactional, contractual, and administrative communications relating to your use of Qustody.

Your Rights

Depending on your location and applicable law, you may have the right to:

- Request information about how and why your personal information is processed and with whom it is shared
- Request access to your personal information
- Request correction of inaccurate or incomplete information
- Request deletion of your personal information
- Request restriction of processing
- Object to processing based on legitimate interests or for direct marketing
- Withdraw consent where processing is based on consent
- Request a portable copy of certain information
- Request safeguards relating to certain automated decisions, including human review where applicable
- Submit a complaint to the relevant data-protection authority, including the Personal Data Protection Commission of Singapore or another authority with jurisdiction

These rights may be subject to legal limitations, including regulatory, security, audit, and record-retention requirements.

To exercise your rights, contact us at **contact@quantumcha.in**. We may need to verify your identity before fulfilling your request and will respond within the period required by applicable law.

If your information is controlled by an organization using Qustody, you may need to submit your request directly to that organization. We will assist the organization in responding where required by applicable law and our agreement with that organization.

Children's Privacy

Qustody is designed for businesses, institutions, professionals, and adults. It is not directed to children under the age of 18, and we do not knowingly collect personal information from

children. If we learn that we have collected personal information from a child, we will take reasonable steps to delete it unless retention is required by law.

Third-Party Websites and Services

Qustody may contain links to or integrate with third-party websites, applications, blockchains, or services.

Those parties operate under their own terms and privacy policies. Quantum Chain is not responsible for their independent privacy or security practices.

Changes to This Policy

We may update this Privacy Policy periodically to reflect changes to Qustody, our information-handling practices, or applicable legal requirements.

We will publish the updated policy on our website and revise the effective date. Where appropriate, we may provide additional notice through the Qustody platform or by email.

Contact Us

If you have questions, wish to exercise your rights, or want to raise a concern about how Qustody handles personal information, please contact our Data Protection Officer:

Quantum Chain Pte Ltd

Hong Leong Building

16 Raffles Quay

Singapore 048581

Email: contact@quantumcha.in