

MARKETING CONSENT POLICY

effective 27.12.2022

Who are “We”?

We are Trust Fractal GmbH, with a registered address at Kochhannstraße 6, 10249 Berlin, Germany, commercial registration number HRB 198469 B and VAT ID DE 315012567.

What are you agreeing to?

You may be about to create or have created a Fractal ID account, most likely for the purposes of onboarding with one of the “**Integrators**” of Fractal ID (companies that use our software solution to onboard their customers). Fractal ID gives you a digital identity wallet that you can use to onboard with the services of our Integrators. Additionally, we partner with our Integrators and other companies - our “**Partners**” - to offer you a variety of benefits (e.g., bonuses for registering with our Partners, discounts in trading fees when using our Partners’ services, etc.). **Our Integrators and Partners are financial services providers, in particular FinTechs - for example, cryptocurrency exchanges and trading platforms, providers of crypto wallet infrastructure, crypto-backed lending platforms, crypto savings accounts providers, digital banks, etc. Our Integrators and Partners can also be providers of services that support the operation of the FinTech industry - for example, crypto tax software providers, etc.**

By agreeing to this Marketing Consent Policy, you agree to receive, through e-mail, SMS (depending on the registration method you select), as well as social media accounts/handles and any other means of communication you provide us, advertising and marketing information from Us about:

- 1. Our identification product and service, including new features or new Integrators and Partners;**
- 2. The products and services of our Integrators and Partners;**
- 3. The products and services offered by our affiliate company Fractal Vault GmbH, with registered address at Wiener Straße 10, 10999 Berlin, Germany, commercial registration number HRB 198469 B and VAT ID DE 319522152.**

For these purposes, **we will process your e-mail address or your mobile phone number** (depending on the registration method you select), as well as social media accounts/handles and any other means of communication you provide us. You confirmed your ownership over the e-mail or phone number that will be used for advertising and marketing communication by clicking on a confirmation link we sent you via e-mail or SMS. You also confirm your ownership of the social media accounts/handles and any other means of communication you provide us.

Your right to revoke the Marketing Consent

You can withdraw your consent at any time by sending an e-mail to privacy@fractal.id. Our advertising and marketing communication will also include a link allowing you to revoke the



marketing consent. You also find the option to revoke the marketing consent in your Fractal ID dashboard, under the Privacy section.

Please note that this Marketing Consent differs and is separate from any other marketing consent you may or may not have granted to any other party that you sign up with or intend to sign up with using Fractal ID.

Integrators and Partners communications

By agreeing with this Marketing Consent Policy, you also instruct us to share your email address or mobile phone number (depending on the registration method you select), as well as social media handles and any other means of communication you provide us, with Partners in order to be directly contacted by them about products and services.

You may opt out of such a feature at any time by sending an e-mail to privacy@fractal.id.

For these purposes, **we will process your e-mail address or your mobile phone number**, (depending on the registration method you select), as well as social media accounts/handles and any other means of communication you provide us. You confirmed your ownership over the e-mail or phone number that will be used for advertising and marketing communication by clicking on a confirmation link we sent you via e-mail or SMS. You also confirm your ownership of the social media accounts/handles and any other means of communication you provide us.

Fractal does not offer nor employs individuals to offer such Partner's products or services. You acknowledge that Fractal does not supervise, direct, control or monitor Partners in the offering of these products or performance of these services and agree that we are not responsible for the offering, performance or procurement of these products or services, that we do not endorse any particular Partner's offered product or services, and that nothing shall create an employment, agency, or joint venture relationship between Fractal and any Partner. You agree that we are not responsible for Partner's or others' content or information and that we are not responsible for any misuse of our Services.

General Provisions

We may modify this Marketing Consent Policy and any other documents linked or referred to in these policy (together, "**Documents**"), or any portion of the Documents. You should look at these documents regularly. We may notify you of modifications to the Documents by posting a notice or by sending you an email (using the address you provided when registering), as we may determine, at our sole discretion, on a case-by-case basis. Your login and/or continued use of our services constitutes your acceptance of the modification to the Documents and/or to the functionalities of the services. You instruct us to, whenever the Documents are modified, to post them online or to send you via e-mail, as we may determine in our sole discretion, and confirms that you will be responsible for reviewing the Documents link or the e-mail and in case of non-agreement, you will send an e-mail informing us of the same.