

<b>Document ID</b> <b>PP001</b>	<b>Title</b> <b>External Privacy Policy</b>	<b>Print Date</b> <b>mm/dd/yyyy</b>
Revision <b>2.4</b>	Prepared By <b>Max Glynn, ISM (Previous)</b>	Date Prepared <b>20/01/2025</b>
Effective Date: <b>10/02/2026</b>	Reviewed By <b>Lurong Chen, ISM (Current)</b>	Date Reviewed <b>10/02/2026</b>
Expiration Date: <b>10/02/2027</b>	Approved By <b>Lurong Chen, ISM (Current)</b>	Date Approved <b>10/02/2026</b>

<b>Revision</b>	<b>Notes</b>	<b>User</b>
2.0	The entire policy was reformatted and rewritten	Max Glynn
2.1	Third Parties specified	Max Glynn
2.2	Updated to reflect new vendors/third parties	Max Glynn
2.3	Updated to reflect archiving period and new vendors/third parties. section on Special category data removed.	Max Glynn
2.4	Performed annual review and no amendments are proposed.	Lurong Chen

**Purpose:**

Nemean Services ('Nemean') is a "controller", meaning it is responsible for deciding how it holds and uses the personal information of its clients and any other relevant third parties.

Nemean takes its privacy obligations seriously and this privacy policy has been designed to clearly explain how we treat any personal information that we have collected. Personal information is the information we hold that is identifiable as being about you.

Our collection, use, and disclosure of your personal information is regulated by the United Kingdom's General Data Protection Regulation ('GDPR') and the Data Protection Act 2018.

It is important that you read and retain this notice, together with any other privacy statement we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under data protection legislation.

## **What are your data protection rights?**

As part of Nemean's responsibilities as a data controller, every user is entitled to the following:

The right to access - You have the right to request copies of your personal data held by Nemean.

The right to rectification - You have the right to request that Nemean correct any information you believe is inaccurate. You also have the right to request that Nemean completes any information you believe to be incomplete.

The right to erasure - You have the right to request that Nemean erases your personal data, under certain conditions.

The right to restrict processing - You have the right to request that Nemean restrict the processing of your personal data, under certain conditions.

The right to object to processing - You have the right to object to Nemean's processing of your personal data, under certain conditions.

The right to data portability - You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

## **What data do we collect?**

By using our website Nemean will automatically collect any data provided to us by your browser via our website's cookies. Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. This data includes internet protocol (IP) address, your browser type and version, your time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website. A mix of first-party and third-party cookies are used.

As part of our KYC and operational requirements meanwhile, Nemean will collect and hold a range of personal identification information including:

- Names
- Email addresses
- Phone numbers
- Identification documents
- Bank account/Payment details
- Criminal convictions and offenses

## **How do we collect your data?**

Nemean is directly provided with your data in the following ways:

- From your browsers cookies when you use our website
- From completion of our enquiry form on our website
- Any data provided by yourself during your onboarding as a client via approved means of communication (i.e. email)

As part of our trusted third party role we may also receive and share information from/with relevant third parties if required (i.e. custodians, exchanges etc).

All third parties Nemean shares your data with are required to treat your data in a safe and secure manner in accordance with the law. Third-party service providers are only permitted by Nemean to use your personal data for specified purposes in accordance with our explicit instructions.

## **How do we use your data?**

Nemean will only use personal information when it is required for standard operations as permitted by the applicable legislation.

Most commonly, Nemean will use personal information in the following circumstances:

- Conducting industry standard 'Know Your Customer' (KYC)/ 'Anti-Money Laundering' (AML) checks when onboarding new clients
- Communicating with clients via agreed methods of communication (i.e. email)
- Confirming the identity of clients during disaster recoveries or forced settlements
- Sending relevant documentation
- Sorting payments for goods and services provided to you by Nemean

Your personal data will be shared with our due diligence provider Northrow for the purposes stated above. You will be notified of any other third parties they share this information with during the onboarding process. In this regard, your data will only ever be shared with approved third parties for the explicit purpose of conducting relevant due diligence checks as detailed above.

Our parent company M to M (Services) Ltd may also be provided with your contact information for the purpose of our quarterly newsletter. If you wish to unsubscribe from this newsletter please email [info@nemeanservices.co.uk](mailto:info@nemeanservices.co.uk).

For clients who utilize us as a trusted third party, there is a 3-year archiving period for data assets in the case of accidental cryptocurrency transfer. For this, we will maintain client information related to archived data assets to ensure we can validate their identities in the case of a recovery.

### **What if there is a change of purpose?**

Nemean will only use your personal data for the stated purposes for which we collected it as detailed above. The only exception to this is if it becomes required for another purpose that is compatible with the original purpose.

If Nemean needs to use your personal data for an unrelated purpose, you will be notified along with an explanation detailing why it is being processed as such and the legal basis which allows us to do so. Please note that under very specific circumstances (namely when it is required by law) Nemean may process your personal data without your knowledge or consent.

### **What if you do not provide us with your data?**

When Nemean is required to collect personal data by law, as part of an information security framework requirement, or under the terms of a contract/agreement we have with you, failing to provide Nemean data when it is requested may result in us being unable to perform the services agreed in any contracts between the two parties. This will also be the case if data that you provide to us is false or otherwise inaccurate.

### **How do we store your data?**

Nemean securely stores your data on our cloud business drives provided by Google with several security and data loss measures in place in order to prevent your personal data from being breached, altered without authorisation or lost.

Nemean also operates using a variety of Software-as-a-service cloud platforms and tools. Therefore your personal data may also be stored/transmitted on the following:

- Hubspot
- Docusign
- Xero
- Paypal
- Northrow
- Nordpass
- Nordlocker

Access to data is restricted based on the principle of least privilege. This means access to your personal data is restricted to only those employees, contractors, and other third parties that have a legitimate business need to know. Anyone who is granted access to your data will only process it for a legitimate business purpose and will be subject to a duty of confidentiality.

Nemean will keep your personal data for as long as you are a client. If you are no longer our client we will aim to delete your non-essential data after 180 days (with the exception of specific circumstances such as a legal or regulatory requirement). However, in line with our legal obligations Nemean will retain basic information about you (Identity, Financial, Contact and Transaction Data) for seven years after you cease being our client for tax purposes.

### **Changes to this Privacy Policy**

This Privacy Policy may be subject to change. Any changes to the Policy will be updated on this page. Should there be any significant changes to the Privacy Policy, we will aim to provide a notice by email. By using the service after the notice, you will be deemed to have consented to the changes. Each version of the Privacy Policy is identified by an effective date on this page whereas previous versions of the Privacy Policy are kept in an archive and can be redeemed for your review upon request. Please feel free to contact us at any time with any inquiries.

### **How to contact us**

Our full legal name is NEMEAN SERVICES LTD and our registered company number is 13576616.

Our registered office address is 13 Manette Street, Soho, London, England, W1D 4AP.

Our working address is 11 Greek Street, Soho, London, England, W1D 4DJ

If you have any questions about our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

You can do so by submitting an inquiry on our website or by contacting us by Email (Please send all privacy and data-related inquiries to [support@nemean.services.co.uk](mailto:support@nemean.services.co.uk)).

We will aim to respond within 3 working days to any inquiries.

### **How to contact the appropriate authority**

Should you wish to report a complaint or if you feel that our company has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office.

Phone Number: 0303 123 1113

Website: <https://ico.org.uk/make-a-complaint/>

While we fully respect your right to make any complaint you feel is necessary we would request that you contact us first in order to resolve any issues.

