

PRIVACY POLICY (TLPOL001)

TRITONLAKE

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Change history

Date	Version	Created by	Description of change
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SCOPE

TritonLake Limited (“Company,” “we” or “us”) is concerned about privacy issues and wants you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through our websites, <https://tritonlake.exchange> and <https://www.tritonlake.com/> (the “Site”). By downloading, accessing or using the Site, or providing information to us in connection with the Site, you acknowledge that we may use and disclose such information in accordance with this Privacy Policy. This Privacy Policy does not apply to the privacy, information or other practices of any third party, including any third-party service providers, business partners, and any other third party operating any software application or website to which the Site contains a link.

BY USING OUR SERVICES, YOU CONSENT TO THE INFORMATION PRACTICES AND OTHER TERMS AS DESCRIBED IN THIS PRIVACY POLICY.

JURISDICTIONAL ISSUES

Our collection, use and disclosure of your information, is governed in accordance with the law of the State of New York, U.S.A., without regard to its principles of conflicts of law. You agree to exclusive jurisdiction of the federal and state courts located in New York County, New York State, U.S.A., and waive any jurisdictional, venue or inconvenient forum objections to such courts. We do not represent or warrant that the Site, or any functionality or feature thereof, is appropriate or available for use in any particular jurisdiction. Those who choose to download, access or use the Site do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations.

By downloading, accessing, using or submitting any information to the Site, users from outside the United States acknowledge that the Site is subject to U.S. law, and consent to the transfer of their information to the United States and any other jurisdiction, which may provide a different level of data security than in their country of residence, and waive any claims that may arise under their own national laws.

INFORMATION WE COLLECT

Personal Information:

We define the term “Personal Information” to mean any information that we directly associate with a specific person, or that reasonably can be used to identify a specific person. We and our third-party service providers may collect the following Personal Information through your use of the Site:

- *Name;*
- *Physical and mailing addresses;*
- *Telephone number;*
- *E-mail address; and,*
- *Other personally identifiable information about you and third parties that you may choose to disclose (including by authorizing third parties to disclose) to Company and/or its third-party service providers and business partners, including by completing profile forms, completing applications, questionnaires or similar documents, communicating with customer service personnel, and otherwise interacting with Company and its third-party service providers.*

Certain Personal Information is mandatory and required to access or use certain portions of the Site. If you submit any personal information of or relating to a third party to us or our third-party service providers or business partners in connection with the site, you represent that you have the authority to do so and to permit us to use and disclose such information in accordance with this Privacy Policy.

Information We Collect Automatically:

We use various technologies to collect other types of data that do not directly reveal your identity (“**Other Information**”). Because Other Information does not personally identify you, we may use and disclose Other Information for any purpose. If we associate Other Information with Personal Information, we will treat the combined information as Personal Information in accordance with this Privacy Policy.

We collect the following Other Information through your use of the Site:

Log Files: As is true of most websites, we gather certain information automatically and store it in log files. This information may include IP addresses, browser type, internet service provider, referring/exit pages, operating system information, device manufacturer and model, the name and version of the software applications you are using, date/time stamp and other metadata, and clickstream data. We generally only use this data for purposes such as security, fraud detection, and protecting our rights.

Cookies and Other Data Collection Technologies: We and our affiliates, business partners, and service providers use cookies, web beacons, and similar technologies to manage our websites and email messages and to collect and track information about you and your activities online over time. These technologies help us to recognize you, customize or personalize your experience, and analyze the use of the Site and solutions to make them more useful to you. These technologies also allow us to aggregate demographic and statistical data and compilations of information, which may or may not include Personal Information, and provide this information to our service providers.

Most Internet browsers allow you to remove or manage cookie functions and adjust your privacy and security preferences. Please note, however, that disabling our cookies may result in your inability to take full advantage of all of the features of our services.

Aggregated and De-Identified Information: We may also aggregate Personal Information collected about groups of individuals in order to detect overall trends of the users of our site. We may also de-identify information, which is the process by which we or our agents remove information that can be used to specifically identify a person from a particular data set.

HOW WE USE INFORMATION

We may use Personal Information:

- To fulfil your requests, such as to process your applications, respond to your enquiries, and otherwise operate the Site;
- To send administrative information to you, including information regarding the Site and changes to our terms, conditions and policies;
- To help us improve the customer experience, including by learning more about your preferences to help personalize your experience with us;
- To send marketing communications to you that we believe may be of interest to you;
- To protect the security or integrity of our businesses and Internet properties, including the Site, or our rights, privacy, safety or property, or that of our affiliates, service providers, members, you or others, including through credit-fraud protection and risk reduction; and,

- For any other purpose to which you provide consent.

HOW WE DISCLOSE INFORMATION

Personal Information may be disclosed:

- To our third-party service providers that may provide services such as hosting of the Site, data analysis, IT services and infrastructure, customer service, e-mail delivery, auditing, information and identity verification, background checks, credit checks, payment processing and other similar services;
- To our affiliates and unaffiliated third parties, consistent with your consent to receive marketing communications and services from service providers;
- By you, through messages and other functionality with which you are able to share or post information and materials. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, in connection with the Site;
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceeding); and
- As we believe to be necessary or appropriate:
 - a) under applicable law, including laws outside your country of residence;
 - b) to comply with legal process;
 - c) to respond to requests from public or government authorities, including public or government authorities outside your country of residence;
 - d) to enforce our terms and conditions;
 - e) to protect our operations or those of any of our affiliates;
 - f) to protect our rights, privacy, safety or property, or that of our affiliates, service providers, members, you or others, including through credit-fraud protection and risk reduction; or
 - g) to allow us to pursue available remedies or limit the damages that we may sustain.

CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information for marketing purposes:

We give you many choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt-out from receiving marketing-related e-mails from us based upon your Personal Information. If you no longer want to receive marketing-related e-mails from us on a going-forward basis based upon Personal Information collected pursuant to this Privacy Policy, you may opt-out of receiving such marketing-related e-mails by contacting us at x, or by clicking the unsubscribe link included at the end of such marketing-related e-mails.

How you can access your Personal Information:

If you would like to review or update your Personal Information that has been previously provided to us, you may do so by logging into your account within the Site, or, for certain Personal Information that is not reviewable through the Site, you may contact us using at compliance@tritonlake.com.

UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy at any time. Please take a look at the “Last Updated” legend at the top of this page to see when this Privacy Policy was last revised. Any changes to this Privacy Policy will become effective when we make the revised Privacy Policy available on or through the

Site. Your use of the Site or the submission of any information through the Site following such changes means that you accept the revised Privacy Policy. If we make any material changes in the way we use your personal information, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on the Services and updating the effective date above.

CONTACTING US

If you have any questions about this Privacy Policy, please contact us by sending us an e-mail to compliance@tritonlake.com. Please note that information you submit through e-mail may not be secure; so please do not include financial information or other sensitive information in your messages to us.