



PRIVACY NOTICE

Introduction

GSR Holdings Limited, GSR Consulting Limited and GSR Markets Limited (“The Company”) are in the business providing liquidity in markets for crypto-tokens across different exchanges and providing programmatic trading services to cryptocurrency traders and token issuers (the “Purpose”). The Company must process personal data so that it can provide these services – in doing so, The Company acts as a data controller. You may give your personal details to The Company directly, by providing us with identification documents and contact information. The Company must have a legal basis for processing your personal data. For the purposes of providing liquidity for crypto-tokens, we will only use your personal data in accordance with the terms of the following statement.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data and will process your personal data for the purposes set out. The legal bases we rely upon to offer these services to you are:

- Consent
- Legal obligation
- Contractual obligation

b. Recipient/s of data

The Company will process your personal data with the following recipients:

- File storage providers
- Customer Relationship Management (CRM) and pipeline management tools

c. Statutory/contractual requirement

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data.



2. Data retention

The Company will retain your personal data for six (6) years. Different laws require us to keep different data for different periods of time.

Where The Company has processed your personal data, we will do so in line with our retention policy. Upon expiry of that period The Company will seek further consent from you. Where consent is not granted The Company will cease to process your personal data.

3. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data you have the right to withdraw that consent at any time.

4. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: gsr@gsr.io

You also have the right to raise concerns with the Privacy Commissioner of Hong Kong or any other relevant supervisory authority if you believe that your data protection rights have not been adhered to.