
PRIVACY POLICY of Luminora Solutions Corp.

Last Updated Date: 1 June 2026

Luminora Solutions Corp., a company incorporated under the laws of the Republic of Panama under registration number 155782746, with its registered office at Torre Global Bank, 18th Floor, Office 1801, Calle 50, Panama City 0830, Republic of Panama (the “*Company*”, “*Luminora*”, “*we*”, or “*us*”), respects the privacy of the individuals whose personal information it processes (the “*you*” or “*your*”). This Privacy Policy (the “*Policy*”) explains how the Company collects, uses, discloses, and protects personal information in connection with its cryptocurrency exchange and settlement services (the “*Services*”) and the related website (the “*Website*”). The Company processes personal information in accordance with the personal-data-protection framework of the Republic of Panama, including **Law No. 81 of 26 March 2019** and **Executive Decree No. 285 of 28 May 2021**.

1. SCOPE AND RELATED POLICIES

- 1.1. This Policy applies to personal information processed by the Company in connection with the Services, whether received directly from you, obtained through partner aggregator platforms, or generated automatically.
- 1.2. This Policy should be read together with the Company’s “*AML and KYC Compliance Policy*” and “*Cookie Policy*”. Information processed for anti-money laundering and counter-terrorist financing purposes is also subject to the AML and KYC Compliance Policy.
- 1.3. Even where information is not collected at the outset of your use of the Services, the Company may request it at a later stage.

2. SOURCES AND METHODS OF COLLECTION

- 2.1. Directly from you, when you request the Services, complete requested forms, subscribe to communications, or contact the Company.
- 2.2. Automatically, through cookies, web beacons, log files, and similar technologies, as further described in the “*Cookie Policy*”.
- 2.3. From partner aggregator platforms that route exchange requests to the Company, including your wallet address and IP address, pursuant to the contractual arrangements between the Company and such partners.
- 2.4. From third-party analytics, identity-verification, and sanctions-screening providers retained by the Company.

3. CATEGORIES OF INFORMATION WE PROCESS

- 3.1. “*Personal Information*”: information that may be used to identify you, which may include your first and last name, nationality, place of birth, country, date of birth, email address, telephone number, physical address (optional), tax number, passport or identity-document number, social-

security number, driver's licence details, photographic identification, a photograph together with identification and wallet address.

- 3.2. **“Non-Personal Information”**: information that cannot be used to identify you, which may include anonymous usage data, general demographic information, referring and exit pages and URLs, platform type, preferences you submit, your time zone, your Internet Protocol (IP) address, device and screen characteristics, browser type, language, plug-ins, Internet domain, type of device and operating system, and preferences generated from the data you submit.
- 3.3. Notwithstanding the foregoing, any information classified as Non-Personal Information, whether considered alone or in combination with other information available to the Company, that can reasonably be used to identify, locate, single out, or otherwise relate to a specific individual shall be treated as Personal Information and processed in accordance with this Privacy Policy and applicable law.

4. PURPOSES OF PROCESSING

- 4.1. To process and confirm transactions and to manage related details.
- 4.2. To provide, operate, maintain, and improve the Services, including delivering relevant content and a functional user experience.
- 4.3. To monitor for suspicious or fraudulent activity and to maintain the security and integrity of the Services and their users.
- 4.4. To communicate with you, respond to your enquiries, provide support, and send service-related or, where permitted, marketing communications.
- 4.5. To comply with legal and regulatory obligations, to respond to lawful requests, and to establish, exercise, or defend legal claims, including protecting the rights and interests of the Company, its users, and third parties.
- 4.6. To carry out identity and AML/KYC procedures, subject to the Company's **“AML and KYC Compliance Policy”**.

5. DISCLOSURE AND SHARING OF INFORMATION

- 5.1. The Company may share personal information with third-party vendors, contractors, or agents performing functions on the Company's behalf, including transaction-analytics providers (AMLBot, or such other reputable provider as the Company may select) and identity-verification providers (**KYCAID, operated by KYCAID Limited, UK, Company No. 11670407**, or such other reputable identity-verification provider as the Company may select), in each case bound to use the information only to provide services to the Company.
- 5.2. The Company may share personal information with independent partner aggregator platforms through which exchange requests are routed, pursuant to the contractual arrangements between the Company and such partners.

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- 5.3. The Company may share personal information with its affiliates where reasonably necessary to facilitate operations, support the provision of the Services, maintain compliance controls, or perform administrative, technical, or business functions.
 - 5.4. The Company may disclose personal information where it believes in good faith that disclosure is necessary to enforce its policies, respond to claims, protect the rights, property, or safety of any person, prevent, detect, or investigate suspected illegal activity, or comply with applicable law, legal process, regulatory requirements, or requests from competent authorities, including the **Unidad de Análisis Financiero (UAF Panamá)**, the Ministerio Público of the Republic of Panama, and other competent regulatory, supervisory, or law-enforcement authorities.
 - 5.5. The Company may disclose personal information in connection with a merger, acquisition, reorganisation, financing, or sale of all or part of the Company's business or assets, provided that appropriate confidentiality arrangements are maintained and, where required, notice is provided before personal information becomes subject to a materially different privacy policy.

6. SECURITY MEASURES

- 6.1. The Company maintains facilities secured by appropriate access controls and monitoring arrangements and stores personal information using reasonable physical security measures.
- 6.2. The Company implements access controls designed to ensure that personal information is accessible only to authorised personnel, uses firewalls to protect network infrastructure, and applies encryption technologies, including SSL or equivalent measures, for data transmitted over the internet.
- 6.3. The Company maintains documented policies and procedures relating to data protection and privacy, provides periodic training to relevant personnel, and maintains incident-response protocols that may include notification of affected individuals where required by applicable law.
- 6.4. Where information is shared with third-party service providers, they are contractually required to maintain security measures no less protective than those implemented by the Company and to use the information only for the purposes specified in the Company's agreements with them.

7. RETENTION OF INFORMATION

- 7.1. Where required by applicable law or internal compliance procedures, the Company may retain records relating to AML/KYC compliance activities for a period of up to five (5) years, or for such other period as permitted or required by applicable law (including, for reference, **Article 29 of Law No. 23 of 27 April 2015** and **Article 60** of the Tax Code of the Republic of Panama).
- 7.2. Other personal information is retained for as long as necessary to fulfil the purposes described in this Policy or as otherwise required or permitted by applicable law, after which it is deleted or anonymised.

8. PERSONAL INFORMATION OF MINORS

- 8.1. The Services are intended solely for individuals who are at least eighteen (18) years old. The Company does not knowingly permit minors to use the Services or intentionally process their Personal Information. If the Company becomes aware, or reasonably believes, that Personal Information has been provided by an individual under eighteen (18) years of age, it may restrict or

terminate access to the Services and will take reasonable steps to remove the relevant Personal Information from its records, subject to any legal or regulatory retention requirements.

9. CHANGES TO THIS POLICY

- 9.1. The Company may update this Policy from time to time by posting the revised version, with the “Last Updated Date” amended accordingly.
- 9.2. Where you believe the Company is not acting in accordance with this Policy, or you wish to raise any question or take any action concerning this Policy or your Personal Information, you may contact the Company using the details below; the Company will investigate, take appropriate action, and report back to you within thirty (30) days.

10. YOUR RIGHTS AND CHOICES

- 10.1. Subject to applicable data protection law, including **Law No. 81 of 26 March 2019**, you may have the right to: access and obtain a copy of your Personal Information and request its portability; request rectification of inaccurate or incomplete Personal Information; request erasure of your Personal Information; withdraw your consent where processing is based on consent; object to or restrict processing, including for direct marketing; not be subject to discrimination for exercising your rights; and lodge a complaint with the competent supervisory authority.
- 10.2. To exercise any of these rights, please contact info@lumi-nora.com. The Company may need to verify your identity before responding and will respond in accordance with applicable data protection law.

11. CONTACT

- 11.1. Questions, complaints, or claims relating to this Policy, including requests to exercise your rights, may be directed to the Company using the details below:

Luminora Solutions Corp.

Torre Global Bank, 18th Floor, Office 1801, Calle 50, Panama City 0830, Republic of Panama

Email: info@lumi-nora.com

Website: <https://lumi-nora.com>

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