

Privacy Policy

Effective as of November 11, 2025

ARTCLUB 88 FINANCE CORPORATION (operating as ArtPay) is committed to protecting the privacy and security of your personal information in accordance with Canadian privacy laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA), and our obligations under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) as administered by the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC). As a registered Money Services Business (MSB) providing P2P cryptocurrency exchange services (buying and selling USDT with fiat currencies such as USD, EUR, CAD, GBP), we collect, use, and disclose personal information responsibly to prevent money laundering, terrorist financing, and other financial crimes while delivering our services.

Registered as Money Services Business (MSB) with FINTRAC (Canada)

MSB Number: M23048467

Legal Name: ARTCLUB 88 FINANCE CORPORATION

Operating Name: ArtPay

Incorporation Number: BC1443242

Consent

By using the ArtPay website or application, you confirm that you have thoroughly read and understood our Privacy Policy. Your use of our services signifies your agreement to these terms and your commitment to adhere to them. If you do not agree with any of these terms, please refrain from using our website or application. We obtain your express consent for the collection, use, and disclosure of personal information as required by PIPEDA, and you may withdraw consent at any time, subject to legal and contractual restrictions, including those under PCMLTFA. Marketing communications require separate opt-in consent, which you can provide or revoke at any time through your account settings or by contacting us.

Information We Collect

We collect personal information from you when you create an account or use our services. This may include:

- Your cryptocurrency wallet addresses and balances
- Your transaction history
- Your IP address and device information, such as your operating system and browser type
- Other information you provide to us, such as feedback or support inquiries
- Your payment information. If you make purchases or engage in transactions on our platform, we may collect information related to your payment method, such as credit card numbers or bank account details (in compliance with FINTRAC record-keeping requirements)

- Your usage data. We may collect information about how you interact with our app, including the features you use, the time you spend using the app, and other behavioral data

For compliance with PCMLTFA, we also collect identification information for Know Your Customer (KYC) purposes, such as government-issued ID, proof of address, and beneficial ownership details, to verify your identity and assess risks.

How We Use Your Information

We use your personal information to provide you with our ArtPay services and to improve our products and services. This may include:

- Processing your transactions and providing you with transaction confirmations
- Communicating with you about your account or our products and services
- Customizing our products and services to your preferences
- Conducting research and analysis to improve our products and services
- Preventing fraud and protecting the security of our customers and our company
- Providing customer support and responding to inquiries and complaints
- Ensuring compliance with applicable laws, regulations, and legal processes, including AML/CFT obligations under PCMLTFA (e.g., transaction monitoring, suspicious activity detection, and reporting to FINTRAC)

Marketing communications, such as promotional materials and notifications about updates or new features, require your separate express opt-in consent and are not included in the general consent for service provision. All uses are limited to what is necessary and permitted under PIPEDA and PCMLTFA.

How We Share Your Information

We do not sell or rent your personal information to third parties for marketing purposes. However, we may share your personal information with third parties in the following circumstances:

- With service providers who help us operate our business, such as payment processors or fraud prevention companies (under strict confidentiality agreements compliant with PIPEDA)
- With our affiliates or partners who offer complementary financial products or services (e.g., licensed card issuers for white-label bank card services or secure payment gateways), only as necessary for service delivery and with your knowledge where required
- With law enforcement or government agencies, including FINTRAC, to comply with legal requirements, prevent fraud, or report suspicious transactions under PCMLTFA
- With your consent or at your direction
- With our professional advisors, such as lawyers, compliance officers, and accountants, where necessary to obtain advice or protect our business interests, in accordance with privacy laws

We may also disclose information if required by court order or to protect against fraud or illegal activities. Sharing is always minimized and conducted with safeguards to protect your privacy.

Data Retention

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, to comply with our legal obligations (including FINTRAC record-keeping requirements of at least 5 years for transaction records and client identification), resolve disputes, and enforce our agreements. The specific retention periods depend on the nature of the data and the purposes for which it was collected. Once no longer required, information is securely destroyed or anonymized in accordance with PIPEDA.

Data Security

We take reasonable measures to protect the security of your personal information, including encryption and authentication technologies. As a FINTRAC-registered MSB, we implement robust safeguards to prevent unauthorized access, disclosure, or alteration, aligned with PCMLTFA guidelines. However, no security measures can guarantee absolute security, and we cannot guarantee the security of your personal information. In the event of a privacy breach, we will notify affected individuals and the Office of the Privacy Commissioner of Canada as required by law.

Cookies and Tracking Technologies

We use cookies and similar tracking technologies to collect and use personal information about you. This information may be used to understand how you use our services, track your preferences, and improve our offerings. You can manage cookie preferences through your browser settings. We comply with PIPEDA principles for consent in tracking.

User Obligations and Responsibilities

You agree to provide accurate and up-to-date information when creating an account and using our services.

You are responsible for maintaining the confidentiality of your account credentials and for all activities that occur under your account.

You agree not to engage in any activities that are illegal, harmful, or interfere with the operation of our services, including those that may violate AML/CFT laws.

Your Choices and Rights

You have certain choices and rights regarding your personal information under PIPEDA. You can:

- Access and update your personal information by logging into your account or contacting us
- Request that we delete your personal information, subject to legal requirements (e.g., FINTRAC retention rules) and our business needs
- Withdraw consent for non-essential uses (e.g., marketing)
- Request details on how your information is used or shared

To exercise these rights, contact us using the information below. We will respond within 30 days, as required by PIPEDA.

Limitation of Liability

We are not liable for any indirect, incidental, or consequential damages arising out of or related to your use of our services, except in cases of gross negligence, willful misconduct, or as otherwise required by law. Our total liability for direct damages shall not exceed the amount of fees paid by you in the twelve (12) months preceding the claim.

PIPEDA Data Protection

We comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), which governs the collection, use, and disclosure of personal information in the course of commercial activities. As a user, you have the following rights under PIPEDA:

1. **Right to Access:** You have the right to request a copy of the personal information we hold about you.
2. **Right to Rectification:** You have the right to request the correction of any inaccuracies in your personal information.
3. **Right to Withdrawal of Consent:** You may withdraw consent for certain uses, subject to legal obligations.
4. **Right to Challenge Compliance:** You may challenge our compliance with PIPEDA principles.

If you wish to exercise any of these rights, please contact us using the contact information provided below. We will respond to your request in accordance with PIPEDA requirements.

Age and Right to Create Accounts

Our services are financial in nature and available only to individuals who are at least 18 years of age (or the age of majority in their province or territory, which may be 19 in some cases). Users under 18 are not permitted to create accounts or engage in transactions. We do not knowingly collect personal information from individuals under 18 and will delete any such information if discovered.

Changes to This Privacy Policy

We may update this Privacy Policy occasionally to reflect changes in our products, services, or legal requirements. We will notify you of any material changes by posting a notice on our website or sending you an email.

Contact Us

If you have any questions or concerns about our Privacy Policy, please contact us at support@artpay.cloud. Our Compliance Officer is available to address privacy-related inquiries in accordance with PIPEDA and PCMLTFA.

Approved by Senior Management of ARTCLUB 88 FINANCE CORPORATION

Date: November 11, 2025