

# Privacy Notice

*Last updated: March 2026*

Bluechip Wrapped Limited, a company incorporated in Nigeria (RC No. 9045187) ("**xNG Markets**", "**us**", "**we**", or "**our**"), takes the privacy and security of your data seriously. This Privacy Notice explains what information we collect when you use our website at <https://xng.markets> (the "Site"), the xNG mobile application (the "App"), and all related services (collectively, the "Services"), how we use it, who we share it with, and what rights you have over it.

Capitalized terms not defined here carry the meaning given in our Terms of Service at <https://xng.markets/terms>. "**Personal Data**" means any information that identifies or can reasonably be used to identify you. "**You**" means any visitor or user of the Services.

**A note on jurisdiction and data standards:** Bluechip Wrapped Limited is incorporated in Nigeria and our data processing is subject to the Nigeria Data Protection Act 2023 (NDPA) and regulations issued by the Nigeria Data Protection Commission (NDPC). We also apply internationally recognized data protection standards to all users regardless of where they are located – including the principles of purpose limitation, data minimization, storage limitation, security, and transparency that underpin the GDPR. Users located in the European Economic Area or United Kingdom benefit from equivalent protections as a matter of our policy, not merely where required by local law. We believe good data practice is not a geography problem – it is a trust commitment.

## 1. Information We Collect

We collect information in three ways: directly from you, automatically through your use of the Services, and from regulated third-party sources.

**1.1. Information You Provide.** When you register an account, complete identity verification, submit an integration enquiry, subscribe to updates, or contact our support team, we may collect:

- (a) **Identity Data** – full name, date of birth, nationality, and copies of government-issued identification documents required for KYC compliance;
- (b) **Contact Data** – email address and phone number;
- (c) **Financial and Wallet Data** – wallet addresses, portfolio holdings, and transaction history on the platform;
- (d) **Communication Data** – the content of support messages, feedback, or enquiries you send us.

**1.2. Automatically Collected Data.** When you access the Site or App, we automatically collect:

- (a) **Device and Network Data** – IP address, browser type, operating system, device identifiers, and mobile carrier;

(b) **Usage Data** – pages and features accessed, session duration, click paths, and referring URLs;

(c) **Blockchain Data** – public wallet addresses and onchain transaction records associated with your use of the Services. Blockchain data is publicly visible by design and cannot be deleted.

**1.3. Data from Third Parties.** We may receive identity verification results from licensed KYC providers, sanctions screening results from compliance services, and market data from blockchain data providers, to the extent necessary to operate the Services and comply with our regulatory obligations.

## 2. How We Use Your Information

We use your Personal Data only for the purposes described below and only to the extent necessary for those purposes:

– **Service Delivery** – to operate the Site and App, process transactions, manage your account, and provide customer support.

– **Identity Verification and Regulatory Compliance** – to verify your identity, screen against sanctions lists, comply with KYC and AML obligations, and meet our reporting requirements to securities regulators.

– **Regulatory Reporting** – to share required information with Trovotech Limited, our Tokenization Partner, who as part of their role is required to report to the Securities and Exchange Commission of Nigeria (SEC Nigeria) and other applicable regulators. See Section 3.2 for full details.

– **Service Improvement and Analytics** – to understand how users interact with the Services, identify trends, fix issues, and develop new features. Where possible, we use aggregated and anonymized data for this purpose.

– **Communications** – to send service-related notices (including security alerts, Terms updates, and transaction confirmations) and, with your consent, marketing communications about new features or products.

– **Security and Fraud Prevention** – to detect unauthorized access, prevent fraud, enforce our Terms, and protect the integrity of the Services.

– **Legal Compliance** – to respond to lawful requests from regulators, courts, and law enforcement authorities.

**Legal Basis for Processing.** We process your Personal Data under the following bases: (a) **Contractual necessity** – to perform our contract with you (account management, transaction processing, customer support); (b) **Legal obligation** – to comply with AML/KYC laws, securities regulations, and mandatory reporting to regulators; (c) **Legitimate interests** – for fraud prevention, security, and product improvement, where your rights do not override our interests; and (d) **Consent** – for marketing communications and certain cookies, which you may withdraw at any time. These bases apply regardless of your country of residence. Where stricter local law requires a different basis, we apply that local standard.

### 3. How We Share Your Information

We do not sell your Personal Data. We share it only as follows:

**3.1. Service Providers.** We engage vetted third-party providers for cloud hosting, data storage, identity verification, customer support tooling, and analytics. Each provider is bound by contractual data processing agreements that prohibit use of your data for any purpose beyond the services they provide to us.

**3.2. Trovotech Limited – Tokenization Partner.** xNG Markets engages Trovotech Limited as its authorized Tokenization Partner, responsible for the issuance and ongoing management of tokenized equity tokens available through the Services. As part of this role, Trovotech is subject to mandatory regulatory obligations – including investor record-keeping, transaction reporting, and disclosure requirements – imposed by SEC Nigeria and applicable securities law. To enable Trovotech to fulfil these obligations, we share the following data with them: your full name, identity verification documents, wallet address(es), and transaction history. Trovotech may, in turn, transmit this information to SEC Nigeria and other competent regulatory authorities as required by law. This data sharing is a mandatory condition of accessing tokenized securities through the Services and cannot be opted out of. By agreeing to our Terms of Service, you give your informed and explicit consent to this disclosure. Trovotech processes your data in accordance with applicable data protection law.

**3.3. Regulatory and Law Enforcement Authorities.** We may disclose your Personal Data when legally required to do so – including in response to court orders, regulatory investigations, subpoenas, or to protect the rights, safety, or property of xNG Markets, our users, or the public.

**3.4. Business Transfers.** If xNG Markets undergoes a merger, acquisition, or sale of assets, your Personal Data may be transferred as part of that transaction. You will be notified of any such change in advance where practicable.

**3.5. With Your Consent.** We share information with third parties only where you have given explicit consent for a specific purpose not already covered above.

### 4. International Data Transfers

4.1. Some of our service providers are located outside Nigeria. When we transfer Personal Data internationally, we ensure appropriate safeguards are in place through: (a) transfers to countries with an adequate data protection framework; or (b) standard contractual clauses or equivalent binding instruments that require the recipient to protect your data to the same standard as this Privacy Notice.

4.2. Contact [privacy@xng.markets](mailto:privacy@xng.markets) for details on the specific safeguards used for any international transfer of your Personal Data.

### 5. Data Security

We implement technical and organizational measures designed to protect your Personal Data against unauthorized access, loss, or misuse. These include:

- Encryption of data in transit using TLS/SSL and encryption of sensitive data at rest;
- Role-based access controls with least-privilege principles, periodic access reviews, and immediate revocation upon personnel changes;
- Regular security assessments, penetration testing, and smart contract audits;
- Incident detection and response procedures, with affected users notified in accordance with applicable law.

No system is entirely immune from attack. While we invest heavily in security, we cannot guarantee the absolute security of your data. You are responsible for securing your own account credentials, private keys, and recovery phrases – we will never ask for these.

## 6. Your Rights Over Your Personal Data

Depending on your location, you may have the following rights. We honor these rights for all users, not only those in jurisdictions where they are legally mandated. To exercise any right, contact [privacy@xng.markets](mailto:privacy@xng.markets). We will respond within thirty (30) days or within the timeframe required by applicable law.

**Access.** Request confirmation of whether we process your Personal Data and, if so, obtain a copy.

**Rectification.** Request that we correct any inaccurate or incomplete Personal Data we hold about you.

**Erasure.** Request deletion of your Personal Data where it is no longer needed for its original purpose, where you withdraw consent, or where processing is unlawful. Note: blockchain transaction data cannot be erased as it is publicly recorded on a distributed ledger.

**Restriction.** Ask us to limit processing of your Personal Data in certain circumstances, such as while we verify a disputed accuracy claim.

**Portability.** Where processing is based on consent or contract and carried out by automated means, receive your data in a structured, machine-readable format.

**Objection.** Object to processing based on our legitimate interests. We will cease unless we can demonstrate compelling grounds that override your rights.

**Withdraw Consent.** Where processing is based on your consent, withdraw it at any time. Withdrawal does not affect the lawfulness of prior processing.

**Marketing Opt-Out.** Unsubscribe from marketing emails at any time via the unsubscribe link in any email, or by contacting [privacy@xng.markets](mailto:privacy@xng.markets).

If you believe your data protection rights have been violated, you may lodge a complaint with the Nigeria Data Protection Commission (NDPC) at [ndpc.gov.ng](http://ndpc.gov.ng). Users in the EEA may also contact their local supervisory authority as listed at [edpb.europa.eu](http://edpb.europa.eu). UK users may contact the Information Commissioner's Office (ICO) at [ico.org.uk](http://ico.org.uk).

## 7. Data Retention

7.1. We retain Personal Data only as long as necessary for the purpose it was collected, or as required by applicable law. For regulatory purposes, identity and transaction records are retained for a minimum of seven (7) years from the date of your last transaction, in line with Nigerian AML and securities regulations.

7.2. When assessing retention periods, we consider the nature and sensitivity of the data, the risk of unauthorized use, the purposes of processing, and any applicable legal obligations.

7.3. Blockchain transaction records are stored permanently on the public blockchain by design and cannot be modified or deleted by us or anyone else.

## 8. Cookies and Tracking Technologies

8.1. We use cookies and similar technologies (including web beacons and pixel tags) to keep the Services running, personalize your experience, and understand usage patterns.

### 8.2. Types of cookies we use:

**Strictly Necessary:** Required for the Site and App to function (e.g., session management, authentication). These cannot be disabled.

**Functional:** Remember your preferences and settings to improve your experience.

**Analytics:** Collect aggregated, anonymized data about how visitors use the Site so we can improve it.

**Marketing:** Deliver relevant content and measure campaign effectiveness. Only placed with your explicit consent.

8.3. You can manage or refuse cookies through your browser settings or our cookie consent tool. Disabling strictly necessary cookies may impair the functionality of the Services.

## 9. Children

The Services are not directed at anyone under 18 years of age. We do not knowingly collect Personal Data from minors. If you believe a person under 18 has provided us with Personal Data, please contact [privacy@xng.markets](mailto:privacy@xng.markets) and we will delete it promptly.

## 10. Changes to This Privacy Notice

We may update this Privacy Notice as our practices evolve or as required by law. When we make material changes, we will update the "Last updated" date and notify you via the Site, App, or email. We encourage you to review this notice periodically.

## **11. Contact Us**

For questions about this Privacy Notice, to exercise your rights, or to raise a concern, please contact our Data Protection team:

**Bluechip Wrapped Limited** (RC No. 9045187)

Email: [privacy@xng.markets](mailto:privacy@xng.markets)

Website: <https://xng.markets>