PRIVACY POLICY AND COMPLIANCE

QQ DIGITAL ONE

(Neo Crypto Bank – Digital Asset Tokenization & Card Services)

Effective Date: 04/15/2026
Website: https://qqdigitalone.com

1. INTRODUCTION

QQ Digital One ("Company", "we", "our", "us") is committed to protecting the privacy, confidentiality, and security of our users' personal and financial information.

This Privacy Policy describes how we collect, use, process, store, and protect information in connection with:

- Digital banking services (Neo Banking)
- Cryptocurrency exchange and custody (OTC and wallet services)
- Tokenization of digital assets
- Debit and credit card services (Visa / Mastercard)
- Payment processing and financial transactions

This policy is designed to comply with applicable regulatory frameworks, including:

- AML/BSA requirements

- Data protection regulations (GDPR principles where applicable)
- Financial compliance standards
- Payment network requirements (Visa / Mastercard)

2. INFORMATION WE COLLECT

2.1 Personal Information

We may collect:

- Full name
- Date of birth
- Nationality
- Government-issued identification
- Residential address
- Email and phone number

2.2 Financial Information

- Bank account details
- Wallet addresses
- Transaction history

Source of funds documentation

2.3 Technical Information

IP address

Device information

Browser type

Access logs

2.4 KYC / Compliance Data

Identity verification records

Sanctions screening results

Risk profiles

Enhanced Due Diligence (EDD) documentation

3. PURPOSE OF DATA COLLECTION

We use collected information to:

Verify identity (KYC/CIP)

Prevent fraud and financial crime

Comply with AML/BSA obligations

Process transactions (fiat and crypto)

Provide card services (Visa / Mastercard)

Manage tokenized digital assets

Improve platform functionality

Respond to legal and regulatory requests

4. CARD SERVICES (VISA / MASTERCARD)

QQ Digital One may offer debit and/or credit card services through licensed partners.

Data usage includes:

Transaction authorization

Fraud monitoring

Chargeback management

Cardholder verification

We comply with:

PCI-DSS (Payment Card Industry Data Security Standard)

Network rules from Visa and Mastercard

5. DIGITAL ASSET TOKENIZATION

QQ Digital One may offer tokenization of digital or real-world assets.

***Data involved*:**

- Asset ownership records
- Smart contract data
- Blockchain transaction records

All tokenization processes are subject to:

- Internal compliance review
- Legal structuring requirements
- Risk and regulatory assessment

6. AML / BSA COMPLIANCE

We implement strict compliance controls, including:

- Customer Identification Program (CIP)
- Know Your Customer (KYC)
- Sanctions screening (OFAC, EU, UN)

Transaction monitoring

Suspicious Activity Reporting (SAR), when applicable

We may share information with:

Regulatory authorities

Law enforcement agencies

Financial institutions and compliance partners

7. DATA SHARING

We may share data with:

Banking partners

Payment processors

Liquidity providers

Blockchain analytics providers

Compliance and KYC vendors

All third parties are required to maintain:

Confidentiality

Data protection standards

Regulatory compliance

8. DATA STORAGE AND SECURITY

We implement industry-grade security measures:

- Encrypted data storage
- Secure servers (VPS / cloud infrastructure)
- Access control (RBAC)
- Firewall protection
- Audit logs

8.1 Data Retention

- Minimum retention: **5 years**
- In accordance with AML/BSA regulations

9. USER RIGHTS

Depending on jurisdiction, users may have rights to:

- Access their data
- Correct inaccurate data
- Request deletion (subject to regulatory retention)

Object to certain processing

Requests can be submitted via official contact channels.

10. COOKIES AND TRACKING

We may use cookies to:

Enhance user experience

Monitor platform performance

Ensure security

Users may manage cookie preferences through browser settings.

11. INTERNATIONAL DATA TRANSFERS

Data may be transferred across jurisdictions for:

Operational purposes

Compliance checks

Service provision

We ensure appropriate safeguards are in place.

12. LIMITATION OF LIABILITY

While we implement strong security measures, no system is completely immune to risks.

QQ Digital One shall not be liable for:

- Unauthorized access beyond reasonable control
- Third-party system failures
- Blockchain-related risks (including irreversible transactions)

13. CHANGES TO THIS POLICY

We reserve the right to update this policy at any time.

Users will be notified of material changes through:

- Website updates
- Official communications

14. CONTACT INFORMATION

For inquiries regarding this Privacy Policy:

QQ Digital One
Email: compliance@qqdigitalone.com
Website: https://qqdigitalone.com

15. FINAL STATEMENT

QQ Digital One is committed to maintaining the highest standards of:

- Privacy protection
- Financial compliance
- Operational integrity

Our framework is designed to align with international best practices in:

- Digital banking
- Cryptocurrency services
- Asset tokenization