NOVARRA

LEGAL · GLOBAL PRIVACY NOTICE

Novarra BBX, LLC

Global Privacy Notice

Last updated: January 1, 2025

1. INTRODUCTION

Novarra BBX, LLC and its subsidiaries and affiliates (“Novarra,” “we,” “our,” or “us”) respect the privacy rights of our clients, partners, and users, and we recognize the importance of protecting your personal information. Protecting your privacy and safeguarding your data is a core priority for us.

This Global Privacy Notice (“Notice”) explains how we collect, use, retain, delete, disclose, and protect your personal data when you interact with Novarra. We encourage you to read this Notice carefully.

Novarra may update this Notice from time to time. The latest version will always be available on our website.

2. SCOPE AND APPLICABILITY

This Notice applies to personal data collected in connection with the following activities (together, the “Services”):

- Visiting our websites at www.novarrabbx.com or affiliated domains.
- Using our institutional services and platform products, including but not limited to: digital asset swaps, structured liquidity pools, settlement rails, custodial wallets, carbon credit trading, escrow, and related institutional services.
- Engaging with us as part of compliance onboarding (KYC/KYB/AML/PEP/Travel Rule checks).
- Interacting with us through marketing activities, newsletters, or events.
- Participating in business discussions, partnerships, or licensing opportunities.
- Applying for a role with Novarra.
- Communicating with us for compliance, contractual, or legal purposes.

If you are covered by a specific agreement with Novarra, the terms of that agreement will prevail where inconsistent with this Notice.

Residents of the United States, European Economic Area (EEA), United Kingdom (UK), or other jurisdictions may have additional privacy rights described in Sections 10 and 11 below.

3. PERSONAL DATA WE COLLECT

We collect personal data ("Personal Data") through the following sources:

Information You Provide: Includes account creation details, institutional onboarding, KYC/KYB information, financial data, correspondence, recruitment applications, and event/marketing information.

Information from Third Parties: Includes compliance vendors, integrations, referrals, and public sources (registries, sanctions lists, blockchain data).

Information Automatically Collected: Includes transaction data, device/browser data, IP addresses, cookies, and tracking technologies.

4. HOW WE USE PERSONAL DATA

We use Personal Data to provide services, verify identity, conduct AML/KYC/KYB checks, communicate with you, improve our services, prevent fraud and cyber threats, comply with legal/regulatory obligations, evaluate candidates, market our services, and generate anonymized/aggregated data.

5. HOW WE DISCLOSE PERSONAL DATA

We may disclose Personal Data as follows:
- With your consent
- To service providers (IT, custodial, compliance, blockchain forensics, identity vendors)
- Within Novarra affiliates
- To professional advisors (auditors, lawyers, bankers, insurers)
- For business transactions (mergers, acquisitions, reorganizations)
- To regulators or law enforcement (e.g., FinCEN, OFAC, FCA, FINMA, Cayman CIMA)
- As de-identified or aggregated data

We do not sell Personal Data.

6. HOW WE PROTECT PERSONAL DATA

We use administrative, technical, and physical safeguards to protect Personal Data, including encryption, access controls, monitoring, and audits. No system is fully secure; users are responsible for safeguarding their credentials.

7. RETENTION AND DELETION

We retain Personal Data only as long as necessary for regulatory, contractual, or legal purposes. When retention is no longer required, we securely delete or anonymize the data.

8. COOKIES AND TRACKING

We use cookies and tracking technologies to improve services, analyze usage, and provide marketing. Users may manage cookies through their browsers or opt-out via preference tools. We do not respond to "Do Not Track" signals.

9. YOUR PRIVACY CHOICES

Depending on jurisdiction, you may have rights to:
- Access or copy your Personal Data
- Correct inaccurate data
- Request deletion (subject to legal retention requirements)
- Restrict or object to processing
- Opt out of marketing communications

Requests: compliance@novarra.vc

10. U.S. STATE PRIVACY DISCLOSURES

Residents of California, Virginia, Colorado, Connecticut, Utah, Oregon, Texas, and Montana may have additional rights under state privacy laws. These include rights to opt-out of sales/sharing of data (Novarra does not sell data), limit sensitive data use, and appeal decisions.

11. GDPR / UK GDPR NOTICE

For residents of the EEA, UK, or Switzerland:
- Novarra acts as a "controller" for direct clients and as a "processor" when servicing counterparties.
- Legal bases include contract performance, legitimate interest, compliance, or consent.
- Cross-border transfers rely on Standard Contractual Clauses (SCCs) and UK Addendum safeguards.
- Rights include access, rectification, erasure, restriction, portability, and complaints to local authorities.

12. CHILDREN'S PRIVACY

Services are not intended for individuals under 18. We do not knowingly collect data from minors. Contact privacy@novarra.vc if you believe a minor has provided data.

13. THIRD-PARTY LINKS

This Notice does not apply to third-party sites or services linked to Novarra. Review third-party policies before sharing data.

14. CHANGES TO THIS NOTICE

We may update this Notice periodically. Updates will include a revised “Last Updated” date and may be communicated by email where material.

15. CONTACT US

Questions or requests regarding this Notice may be directed to:

compliance@novarra.vc
Novarra BBX, LLC – Institutional Digital Asset Services