

# Privacy Policy

## Commitment to Privacy

Your privacy is important to us. This Privacy Policy (“Privacy Policy”) explains how we protect your privacy when you use our website, [www.atrium.exchange](http://www.atrium.exchange) (our “Site”), and associated services, sign up for communications from us, or participate in events organized by us or in which we are participating (“Services”). This Privacy Policy describes the types of information we collect, how this information is used, and with whom it is shared. If you have any questions regarding this Privacy Policy, please contact us at [ir@atrium.exchange](mailto:ir@atrium.exchange).

Atrium Exchange is a company focused on the development and operation of a digital trading platform for global agricultural and commodity markets (collectively referred to in this Privacy Policy as “Atrium Exchange,” “we,” “us,” and “our”).

## Scope of this Privacy Policy

This Privacy Policy applies to all “Personal Data” we collect. “Personal Data” is information that identifies you personally, either alone or in combination with other information available to us. Examples include your name, contact information, and details about your activity on our Site.

## Your Consent and Legal Basis for Processing Your Personal Data

By providing your Personal Data or accessing our Site, you consent to the collection, use, and disclosure of your Personal Data as described in this Privacy Policy, to the extent permitted by applicable law.

If you do not consent to the collection, use, or disclosure of your Personal Data as described in this Privacy Policy, please exit and do not use our Site. Where applicable law allows, such as in the EEA, you may withdraw your consent at any time by contacting us. Please note that withdrawing consent may limit our ability to provide certain Services.

We also process Personal Data where necessary for the performance of a contract with you or where it is necessary for our legitimate interests in operating, protecting, and improving our Services.

## Changes to This Privacy Policy

We may update this Privacy Policy as our Services evolve. Changes will be effective when posted on our Site and will apply to Personal Data collected after the posting. Your continued use of our Services constitutes consent to the updated Privacy Policy. You can access the current version of this Privacy Policy at any time via the “Privacy” link on our Site.

## Personal Data We Collect

### Information You Provide:

We collect Personal Data that you voluntarily provide, such as when you sign up for communications or use our “Join Us” forms. Mandatory fields are necessary to provide certain Services, while optional fields enhance the Service experience.

### Information Automatically Collected:

We collect information sent automatically by your browser, including IP address, ISP, browser type and version, operating system, date and time of your visit, and pages visited. This information helps us deliver and improve our Services and ensure security.

### Cookies and Similar Technologies:

We use cookies and similar technologies to:

- Analyze Site usage and interactions;
- Support Site functionality;
- Personalize user experience;
- Measure marketing effectiveness.

### We distinguish between:

- session cookies: temporary, deleted when the browser closes;
- persistent cookies: stored for a period or until deleted by the user.

You may manage cookie preferences via your browser settings. Essential cookies required for Site functionality will always be used.

## How We Use Your Personal Data

We use Personal Data for purposes including:

- providing the Services and information you request;
- ensuring security and fraud prevention;
- personalizing your experience;
- communicating updates, marketing and surveys;
- improving the Site, Services and marketing efforts;
- complying with legal obligations.

## Disclosure of Personal Data

We may share Personal Data with:

- service Providers: companies supporting our operations, such as website hosting and technical support;
- legal Compliance and Protection of Rights: to comply with laws, respond to legal requests, prevent fraud, enforce agreements, or protect our rights and safety;
- as Described in Privacy Notices: consented disclosures on specific pages or Services.

## Your Rights

Depending on your jurisdiction, you may have rights to:

- access, correct, or delete your Personal Data;
- restrict or object to certain processing;
- receive Personal Data in a portable format;
- withdraw consent to direct marketing communications.

To exercise these rights, contact us at [ir@atrium.exchange](mailto:ir@atrium.exchange). Where applicable law allows, you may also lodge a complaint with a relevant Data Protection Authority.

## Retention of Personal Data

We retain Personal Data as long as necessary for our business purposes or to comply with legal obligations. After this period, data is deleted, pseudonymized, or anonymized as permitted by law.

## Contact Information

For questions regarding this Privacy Policy or your Personal Data, please contact:

Email: [ir@atrium.exchange](mailto:ir@atrium.exchange)

Website: [www.atrium.exchange](http://www.atrium.exchange)

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