

# CebuCore Group LLC

## Privacy Policy

**Effective Date:** August 2025

**Entity:** CebuCore Group LLC

**Token:** CCR (CebuCore Utility Token)

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### 1. Introduction

This Privacy Policy ("Policy") explains how **CebuCore Group LLC** ("Company", "we", "us", "our") collects, processes, stores, protects, and discloses personal information of individuals ("User", "you", "your") who interact with our websites, mobile applications, smart contracts, investor portals, or participate in any purchase, holding, or use of **CCR tokens**.

By accessing or using the CebuCore ecosystem, you acknowledge and consent to the terms of this Policy. If you do not agree, you must refrain from using our services.

This Policy is designed to comply with **global data protection standards**, including the **General Data Protection Regulation (GDPR)** of the European Union, the **California Consumer Privacy Act (CCPA)**, and relevant international privacy regulations.

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### 2. Scope of Application

This Policy applies to all users of the CebuCore ecosystem, including but not limited to:

- Token purchasers (including those participating in the IDO).
- Registered account holders on our website or mobile application.
- Business partners, advisors, affiliates, and vendors.
- Individuals interacting with our ecosystem for information, community access, or investment-related activities.

This Policy does **not** apply to third-party platforms (e.g., centralized exchanges, launchpads, or brokers) where CCR tokens may be listed or traded. Those entities have their own privacy policies, and we encourage Users to review them separately.

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### 3. Information We Collect

We may collect the following categories of data:

#### 3.1. Identification Data (KYC/AML compliance):

- Full name, date of birth, nationality, residential address.
- Identity documents (passport, driver's license, ID card).
- Live selfies or video recordings for verification.

#### 3.2. Contact Data:

- Email address, phone number, communication preferences.

#### 3.3. Financial Data:

- Bank account details (if applicable).
- Cryptocurrency wallet addresses.
- Transaction history and records of CCR purchases.
- Proof of source of funds (where required).

#### 3.4. Technical Data:

- IP address, device identifiers, browser details.
- Geolocation (for fraud prevention and legal compliance).
- Cookies, tracking pixels, and session identifiers.

#### 3.5. Behavioral Data:

- Interaction with websites and dApps.
- Participation in referrals, staking, or governance.
- Support tickets and communication logs.

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### 4. Legal Basis for Processing

We process data based on the following grounds:

- **Performance of Contract:** To provide services and deliver CCR tokens.
- **Legal Obligation:** Compliance with AML/KYC, tax, and regulatory requirements.
- **Legitimate Interest:** Fraud prevention, system security, marketing analytics.
- **User Consent:** For optional features such as newsletters or promotional campaigns.

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## 5. How We Use Data

Collected data may be used for:

- Verifying user identity and preventing fraud.
- Conducting AML/CTF checks.
- Processing CCR token purchases and allocations.
- Maintaining user accounts and transaction histories.
- Sending service-related communications.
- Ensuring compliance with global financial regulations.
- Improving products, services, and ecosystem usability.

We will never sell or rent user data to unrelated third parties.

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## 6. Data Sharing and Third-Party Disclosure

We may share user information under strict conditions:

- **Regulatory Authorities:** When required by law, court order, or competent regulator.
- **KYC/AML Providers:** Third-party vendors like **SumSub**, **Passbase**, or **GetID** to process identification.
- **IT & Cloud Providers:** For secure storage, hosting, and analytics.
- **Advisors & Auditors:** Where necessary for legal, tax, or compliance reviews.

All third parties are bound by contractual obligations to protect personal data in accordance with this Policy.

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## 7. Data Storage and Retention

- **Retention Period:** Typically **5–7 years** or as required by law.
- **Storage Location:** Data may be stored in secure servers located in the EU, Singapore, or other compliant jurisdictions.
- **Security Measures:**
  - End-to-end encryption.
  - Multi-factor authentication.
  - Role-based access restrictions.
  - Regular penetration testing and independent audits.

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## 8. User Rights

Depending on your jurisdiction, you may have the following rights:

- **Right of Access:** Obtain a copy of your personal data.
- **Right to Rectification:** Correct incomplete or inaccurate data.
- **Right to Erasure ("Right to be Forgotten").**
- **Right to Restrict Processing.**
- **Right to Data Portability.**
- **Right to Object to Processing.**
- **Right to Withdraw Consent.**

Requests must be submitted via **legal@cebu-core.com** and will be processed in accordance with legal requirements.

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## 9. GDPR Compliance

For users located in the **European Economic Area (EEA)**:

- CebuCore acts as a **Data Controller** of personal data.
  - Legal bases for processing include consent, contract, legal obligations, and legitimate interest.
  - Users may lodge complaints with their national **Data Protection Authority (DPA)**.
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## 10. CCPA Compliance

For residents of **California (USA)**:

- You have the right to know what personal data we collect and how we use it.
  - You have the right to request deletion of your data (subject to legal obligations).
  - We do not sell personal data to third parties.
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## 11. Cookies & Tracking

We use cookies for:

- User authentication.

- Saving preferences.
- Security monitoring.
- Traffic analysis.

#### Types of cookies:

- **Essential cookies:** Required for platform functionality.
- **Analytics cookies:** Track behavior for improvements.
- **Marketing cookies:** Used for promotional campaigns.

Users can disable cookies in browser settings but may experience limited functionality.

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## 12. Incident Response & Data Breach Notification

In the unlikely event of a **data breach**:

- Users will be notified within **72 hours** if risk of harm exists.
  - Regulatory authorities will be informed as required by law.
  - Emergency measures will be taken to secure accounts and prevent unauthorized use.
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## 13. Cross-Border Data Transfers

We may transfer and process data outside your home jurisdiction, including the **EU, Singapore, and the Philippines**. By using our platform, you consent to such transfers.

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## 14. Age Restriction

The CebuCore platform is not intended for users under **18 years old**. We do not knowingly collect data from minors.

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## 15. Jurisdictional Exclusions

- **United States, Canada, China:** Services are **not offered** to residents of these countries. If individuals from these jurisdictions still participate, they do so **entirely at their own risk**, and the Company assumes no liability.

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## **16. Limitation of Liability**

We take all reasonable steps to secure personal data. However, we cannot be held responsible for:

- Cyber-attacks or actions of malicious actors.
- Failures of third-party infrastructure (blockchains, exchanges).
- Legal consequences of Users violating their local laws.

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## **17. Changes to this Policy**

This Policy may be updated from time to time. Updates take effect immediately upon publication on the official CebuCore website.

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## **18. Contact Information**

If you have any questions or concerns regarding this Policy:  
✉ [legal@cebu-core.com](mailto:legal@cebu-core.com)