

Privacy Notice

Last updated: 26 January 2026

This Privacy Notice applies to **Frascati LLC** (“**Frascati**”, “**we**”, “**our**” or “**us**”), a company incorporated under the laws of the **Kyrgyz Republic**, which operates the website and related services made available under the Frascati brand.

This Privacy Notice explains how we collect, use, disclose, and protect personal data in connection with the operation of our website, platform, and related services. It applies to:

- your access to and use of our website, portals, and platform interfaces, including white-label components made available through partner websites;
- your use of any software, applications, or technical tools made available by Frascati; and
- communications between you and Frascati, including email and other electronic communications.

This Privacy Notice describes our data protection practices in a clear and transparent manner. It should be read together with any additional privacy notices, policies, or disclosures referenced herein.

Contact details for privacy-related inquiries are provided at the end of this Privacy Notice.

Information We May Collect

We may collect or receive certain personal data in connection with your access to and use of the Site and Services.

Information You Provide Directly

You may provide personal data to us when you:

- register an account or use the Site or Services;
- communicate with us via email or other electronic means;
- submit inquiries or requests; or
- otherwise interact with the Site.

Such information may include contact details, account-related information, and communications submitted by you.

Information Collected Automatically

When you access or use the Site, certain technical and usage information may be collected automatically, including through the use of cookies and similar technologies. This may include information about your device, browser, IP address, and interaction with the Site.

For more information, please refer to our **Cookie Policy**.

Information Submitted via the Platform for Verification Purposes

In certain cases, personal data may be submitted through the Site for the purpose of identity verification, compliance checks, or other regulated processes performed by **licensed third-party financial institutions or verification providers**.

Such data may include identification documents or other verification-related information. Frascati does not determine the purposes of this processing and does not use such data independently. This information is processed by the relevant third-party providers under their own privacy policies and regulatory obligations.

Information Received from Third Parties

We may receive limited information from third-party service providers, such as infrastructure providers or analytics providers, in connection with the operation, security, and improvement of the Site.

Frascati does **not** obtain personal data from credit reference agencies or perform credit assessments.

Use of Personal Data

We use personal data collected in connection with the Site and Services for the following purposes:

- to operate, maintain, and provide access to the Site and related services;
- to manage user accounts and respond to inquiries or support requests;
- to communicate with you regarding updates, changes, or information relevant to your use of the Site;
- to improve the functionality, security, and performance of the Site;
- to comply with applicable legal obligations within the scope of Frascati's role; and
- where permitted, to send communications related to the Site or Services that may be of interest to you, subject to your preferences.

Frascati does **not** use personal data to assess your financial situation, determine creditworthiness, make automated financial decisions, or perform fraud analysis as a regulated financial institution.

Any financial assessments, fraud detection, or transaction monitoring activities are performed exclusively by licensed third-party financial institutions or service providers under their own regulatory obligations.

Disclosure of Personal Data

Frascati does not sell personal data and does not disclose personal data to third parties except as described in this Privacy Notice.

We may share personal data with the following categories of recipients, where necessary and appropriate:

- **Service providers and infrastructure partners** who support the operation, hosting, security, and maintenance of the Site, acting as data processors on our behalf;
- **Licensed third-party financial institutions and verification providers**, where personal data is submitted through the Site for the purpose of identity verification, compliance checks, or execution of regulated services, acting as independent data controllers;
- **Public authorities or competent bodies**, where disclosure is required by applicable law, legal process, or enforceable request.

Personal data is disclosed only to the extent necessary for the relevant purpose and in accordance with applicable data protection laws.

Where We Store Personal Data and Data Security

Personal data processed by Frascati may be stored and processed on servers located in various jurisdictions where Frascati or its service providers operate. Such locations may be outside the country in which you reside. Where personal data is transferred internationally, Frascati takes reasonable steps to ensure that appropriate technical and organizational safeguards are in place to protect such data in accordance with applicable data protection laws.

Personal data submitted through the Site for identity verification, compliance checks, or other regulated purposes is processed and stored **by licensed third-party financial institutions or verification providers** acting as independent data controllers, in accordance with their own privacy policies, retention requirements, and regulatory obligations.

Where you are provided with login credentials or other access mechanisms for the Site, you are responsible for maintaining the confidentiality of such credentials and for all activities conducted using them. You must not share your login credentials with any third party.

While Frascati implements reasonable security measures designed to protect personal data against unauthorized access, loss, misuse, or alteration, transmission of information over the Internet is not entirely secure. Accordingly, Frascati cannot guarantee absolute security of data transmitted via the Site, and any such transmission is at your own risk.

Once personal data is received, Frascati applies appropriate technical and organizational measures intended to reduce the risk of unauthorized access or disclosure.

Your Rights

Subject to applicable data protection laws, you may have certain rights in relation to personal data processed by Frascati, which may include the right to:

- request access to personal data processed by Frascati;
- request correction or updating of inaccurate or incomplete personal data;
- request deletion of personal data, where permitted by law;
- object to or request restriction of certain processing activities; and
- withdraw consent, where processing is based on consent.

These rights apply only to personal data for which Frascati acts as a data controller. Where personal data is processed by licensed third-party financial institutions or verification providers acting as independent data controllers, requests must be directed to the relevant third party in accordance with their privacy policies.

Certain rights may be subject to limitations or exceptions under applicable law. To exercise your rights, please contact us using the details provided below.

Automated Decision-Making

Frascati does **not** carry out automated decision-making, including profiling or automated decisions that produce legal or similarly significant effects on individuals.

Any automated decisions, fraud detection measures, credit assessments, or transaction monitoring activities are performed **exclusively by licensed third-party financial institutions or service providers** in accordance with their own regulatory obligations and privacy policies.

Frascati does not control, review, or override such automated decisions and is not responsible for their outcomes.

Legal Basis for Processing

Frascati processes personal data only where there is a valid legal basis under applicable data protection laws. Depending on the circumstances, such legal bases may include:

- **Performance of a contract**, where processing is necessary to provide access to the Site or Services or to manage your account;

- **Legitimate interests**, where processing is necessary for the operation, security, and improvement of the Site and Services, provided such interests are not overridden by your rights and freedoms;
- **Consent**, where you have provided consent for specific processing activities, such as receiving optional communications, which you may withdraw at any time;
- **Compliance with legal obligations**, where processing is required by applicable law or lawful requests from competent authorities.

Where personal data is processed by licensed third-party financial institutions or service providers acting as independent data controllers, such processing is subject to their own legal bases and privacy policies.

Changes to This Privacy Notice

Frascati may update this Privacy Notice from time to time to reflect changes in our practices, the operation of the Site, or applicable laws.

Any updates will be posted on this page with a revised “Last updated” date. Where changes are material, we may provide additional notice through the Site or other appropriate communication channels. We encourage you to review this Privacy Notice periodically to stay informed about how we process personal data.

Contact Us

If you have any questions, comments, or requests relating to this Privacy Notice or the processing of personal data by Frascati, you may contact us using the details below.

Frascati does not appoint a data protection officer as a regulated financial institution. Privacy-related inquiries, including requests to exercise applicable data protection rights, may be submitted by email to:

info@frascati.io

Frascati will respond to privacy-related inquiries in accordance with applicable data protection laws and within reasonable timeframes.