

Privacy Policy

Last updated: 17.11.2025

1. GENERAL

1.1. This Privacy Policy describes how CustodianOne LLC (“Custodian” or “CustodianOne”) collects, uses, stores, transfers, deletes, and protects your personal information when you interact with our services.

1.2. Confidentiality and data protection are a top priority for us, and we recommend you to fully review this Privacy policy.

2. SCOPE AND APPLICABILITY

2.1. This Privacy Policy explains how we collect, use, store, share, delete, and protect your Personal Data when you interact with us in any of the following ways:

- By visiting Neo Custody’s website at: <https://custodian.kz/>
- By visiting Personal Account’s website at: <https://my.custodian.kz>

3. DATA COLLECTED BY THE CUSTODIAN

3.1. The Custodian collects and processes the following data about you::

- Personal information: name, email address, phone number, country and citizenship, and other information you choose to provide to us when you contact us with your inquiries.
- Personal data for identity verification/legal entity verification purposes when creating a hot/cold wallet: citizenship country, tax identification number, and other information that you choose to provide us for identity verification.
- Company documents, licenses, certificates.
- Information about your cryptocurrency portfolio, including balances, transactions, and transaction history.
- Technical information, such as IP address, device data, and usage of the service.

4. HOW WE USE PERSONAL DATA

4.1. The Custodian uses your data for the following purposes::

- Providing custodial services and processing your requests.
- Ensuring the security of your cryptocurrency portfolio and preventing fraud.
- Compliance with legal obligations and adherence to applicable laws and regulations.
- Improving and developing our services, including data analysis and the development of new features.

5. HOW WE SHARE PERSONAL DATA

5.1. The Custodian may disclose your information as follows::

- To partners and affiliated companies with whom we collaborate to provide services and fulfill obligations to you.
- When complying with legal requirements and for the protection of our rights or safety.

- With your consent or at your request, such as when providing information about your portfolio to third parties.

6. HOW WE PROTECT PERSONAL DATA

6.1. The Custodian takes security measures to protect your personal data from unauthorized access, use, and disclosure. The Custodian implements appropriate technical and organizational measures to ensure data security.

7. DATA RETENTION PERIOD

7.1. The Custodian stores your personal data only for the period required by law and for the purposes described in this Privacy Policy.

8. COOKIES AND OTHER TRACKING TECHNOLOGIES

8.1. What Are Cookies?

Cookies are small text files that are stored through the browser on your computer or mobile device. Cookies serve a variety of functions; they help you navigate between website pages efficiently and may improve the user experience on a website. Cookies vary in duration (they can be “persistent” or “session-based”), and by whom they are served (“first party” cookies are directly from us; “third party” cookies are from other parties on our behalf). They are only one of several types of technologies used to track online behavior.

8.2. Why We Use Cookies and Other Tracking Technologies?

At Neo Custody, we use cookies to:

- Administer our services.
- Analyze services usage and trends
- Track your browsing history.
- Improve the services functionality.

8.3. Types of Cookies we use.

On our website, we use the following types of cookies:

- Functional Cookies.

We use cookies that are necessary for our services to run, including optimizing or powering features on the services and helping us identify irregular or fraudulent behavior on the services.

- Performance and Analytics Cookies.

9. YOUR RIGHTS

9.1. You have certain rights regarding your personal data, including the right to access, correct, and delete information. You can also withdraw your consent for data processing or limit its use.

10. LINKS TO THIRD - PARTY WEBSITES

10.1. The Custodian's website or service may contain links to third-party websites that are not covered by this Privacy Policy. The Custodian recommends that you review the privacy policies of these third-party websites before providing them with your personal information.

11. CHANGES TO PRIVACY POLICY

11.1. The Custodian reserves the right to make changes to this Privacy Policy. If significant changes are made, the Custodian will notify you by posting an updated version on our website.

11.2. If you have any questions or need additional information about our Privacy Policy, please contact us at office@custodian.kz.