

# Privacy and Cookie Policy

**Effective Date:** 10/10/2024

**Last Updated:** 10/10/2024

## 1. Introduction

- 1.1. This Privacy and Cookie Policy (hereinafter referred to as the "**Policy**") is issued by Cogito Network Inc. (hereinafter referred to as "**we**" "**our**" or "**us**"), in accordance with the General Data Protection Regulation (EU) 2016/679 (hereinafter referred to as "**GDPR**"). This Policy governs the collection, processing, use, and storage of personal data and cookies in connection with your access to and use of the website [Website Name] (hereinafter referred to as the "**Website**"), which is currently a static presentation page.
- 1.2. The purpose of this Policy is to inform you, as a visitor to the Website, of your rights and obligations with respect to personal data and the usage of cookies, and to ensure that you are informed about how we will handle such data once the services displayed on the Website become fully operational. This Policy will be updated accordingly upon activation of the services described on the Website.

## 2. Data Controller

- 2.1. For the purposes of the GDPR, Cogito Network Inc., an International Business Company, incorporated in Saint Lucia with Registration Number 2022-00182, the Registered Office at the offices of Fortgate Offshore Investment and Legal Services Ltd. Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia, shall be the data controller (hereinafter referred to as the "**Controller**") with respect to any personal data collected through this Website. Any inquiries regarding the processing of personal data may be directed to the following contact information:

2.1.1. Email: [Info@singularityfinance.ai](mailto:Info@singularityfinance.ai)

- 2.1.2. Address: Fortgate Offshore Investment and Legal Services Ltd. Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia

### **3. Scope of the Policy**

- 3.1. This Policy applies solely to the Website, which currently serves as a static presentation page, with no interactive services, user accounts, or forms through which personal data can be submitted. As such, at this stage, we do not collect, process, or store any personal data from visitors to the Website.
- 3.2. Upon the activation of services and the inclusion of interactive functionalities (e.g., registration forms, user accounts, contact forms), this Policy will be amended to reflect the methods and purposes of personal data collection and processing in compliance with applicable data protection laws.

### **4. Personal Data Collection**

- 4.1. At this time, the Website does not collect or process any personal data, as it is solely a presentation page that does not require user registration, submission of information, or other forms of interaction.
- 4.2. Once the Website's services are fully operational, we may collect personal data through various means, including but not limited to:
- 4.2.1. Identification Data: Name, address, email address, phone number, or other contact details, provided voluntarily by users through forms or interactions with the Website;
- 4.2.2. Technical Data: Internet Protocol (IP) addresses, browser types, and device information, collected automatically when you access the Website; and
- 4.2.3. Interaction Data: Information related to your usage of the Website, such as page views, clicks, and preferences.
- 4.3. Upon the commencement of such data collection, the legal basis for processing, as well as the specific categories of data processed, will be detailed in an updated version of this Policy.

### **5. Lawful Basis for Processing**

- 5.1. The Controller shall process personal data in accordance with Article 6 of the GDPR, relying on one or more of the following lawful bases:
- 5.1.1. Consent: Where you have provided your explicit consent to the processing of personal data for specified purposes.

- 5.1.2. Legal Obligation: Where the processing of personal data is required for compliance with legal obligations to which the Controller is subject.
- 5.1.3. Legitimate Interests: Where the processing of personal data is necessary for the legitimate interests pursued by the Controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.
- 5.2. The specific lawful basis for any future processing activities will be outlined in the updated version of this Policy once the Website's services become operational.

## **6. Use of Cookies**

- 6.1. The Website currently uses only essential cookies, which are strictly necessary for the Website's basic functionality as a presentation page. These cookies do not collect personal data and cannot be disabled without impairing the operation of the Website.
- 6.2. In the future, the Website may employ additional types of cookies, such as analytics cookies, advertising cookies, and functionality cookies. Upon activation of these cookies, users will be provided with detailed information regarding the purpose of each cookie, and consent will be requested for the use of non-essential cookies, in accordance with Article 6(1)(a) of the GDPR.
- 6.3. The types of cookies that may be used include, but are not limited to:
  - 6.3.1. Strictly Necessary Cookies: Essential for the operation of the Website.
  - 6.3.2. Analytical/Performance Cookies: Used to analyse how visitors interact with the Website, enabling us to improve its functionality.
  - 6.3.3. Functionality Cookies: Used to remember user preferences and enhance the user experience.
  - 6.3.4. Targeting/Advertising Cookies: Used to deliver personalised advertisements based on user behavior.
- 6.4. The updated Cookie Policy and Cookie Management Tool will be made available upon activation of these functionalities.

## **7. Data Sharing and Transfers**

- 7.1. At this stage, the Website does not collect personal data, and therefore, no data is shared with or transferred to third parties.
- 7.2. Once services become operational, the Controller may share personal data with third-party service providers (hereinafter referred to as "**Processors**") engaged to assist with the operation and management of the Website. These Processors will process

personal data strictly in accordance with the Controller's instructions and GDPR requirements.

- 7.3. In the event that personal data is transferred outside the European Economic Area (EEA), the Controller will ensure that appropriate safeguards, as prescribed by Chapter V of the GDPR, are in place to protect the data, including but not limited to the use of Standard Contractual Clauses (SCCs).

## **8. Data Retention**

- 8.1. At present, no personal data is collected or retained by the Website. When personal data processing begins, the Controller will retain personal data only for as long as is necessary to fulfill the purposes for which it was collected, or to comply with applicable legal, accounting, or regulatory obligations.
- 8.2. Upon the commencement of data collection, specific retention periods for different types of data will be outlined in the updated version of this Policy.

## **9. Data Security**

- 9.1. The Controller is committed to ensuring the confidentiality, integrity, and availability of any personal data processed via the Website. Although no personal data is currently processed, we will, upon activation of our services, implement appropriate technical and organizational measures to safeguard personal data against unauthorized access, accidental loss, or unlawful destruction.
- 9.2. These security measures will include, but are not limited to, data encryption, access controls, and regular monitoring of security systems.

## **10. Data Subject Rights**

- 10.1. In compliance with the GDPR, individuals whose personal data is processed by the Controller (hereinafter referred to as "**Data Subjects**") shall have the following rights:
  - 10.1.1. Right of Access: Data Subjects have the right to request access to their personal data and to obtain information regarding its processing.
  - 10.1.2. Right to Rectification: Data Subjects have the right to request the rectification of inaccurate or incomplete personal data.
  - 10.1.3. Right to Erasure: Data Subjects have the right to request the erasure of their personal data, subject to legal or regulatory requirements.
  - 10.1.4. Right to Restrict Processing: Data Subjects have the right to request the restriction of the processing of their personal data under certain conditions.

- 10.1.5. Right to Data Portability: Data Subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format and to request its transfer to another data controller.
- 10.1.6. Right to Object: Data Subjects have the right to object to the processing of their personal data for direct marketing purposes or on grounds related to their particular situation.
- 10.1.7. Right to Withdraw Consent: Where consent is the basis for processing, Data Subjects have the right to withdraw their consent at any time.
- 10.2. Upon the activation of the Website's services, detailed procedures for exercising these rights will be provided.

## **11. Changes to this Policy**

- 11.1. The Controller reserves the right to amend this Policy at any time to reflect changes in the processing of personal data, technological developments, or legal and regulatory updates. Any modifications to this Policy will be communicated by updating the "Last Updated" date at the top of this document.
- 11.2. We advise all users to periodically review this Policy to remain informed of any changes.

## **12. Contact Information**

- 12.1. Should you have any questions or concerns regarding this Policy, or wish to exercise your rights under GDPR, you may contact the Controller at:
  - 12.1.1. Cogito Network Inc.
  - 12.1.2. Email: [Info@singularityfinance.ai](mailto:Info@singularityfinance.ai)
  - 12.1.3. Address: Fortgate Offshore Investment and Legal Services Ltd. Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia