

## Privacy Policy

How personal data is collected, used, stored, and disclosed

Operator TPG Corporation LLC

Domains swapcoinvest.com | app.swapcoinvest.com

Registered Address Georgia, Khelvachauri Municipality, Khelvachauri Village, 6th Street, II Lane, No. 1G

Effective Date 25 March 2026

### 1. Introduction

This Privacy Policy explains how TPG Corporation LLC collects and uses personal data when individuals visit swapcoinvest.com, use app.swapcoinvest.com, create accounts, purchase educational services, contact support, or otherwise interact with the Platform.

This document is intended to provide a layered and transparent overview of the categories of information processed, the purposes of processing, possible disclosures, retention periods, and available user rights.

### 2. Data Controller Information

The data controller for the purposes described in this Policy is TPG Corporation LLC, registered in Georgia under registration number 448431803, with its registered address at Georgia, Khelvachauri Municipality, Khelvachauri Village, 6th Street, II Lane, No. 1G.

General support contact: support@swapcoinvest.com. Privacy contact: privacy@swapcoinvest.com.

### 3. Categories of Data We May Collect

Identity and contact data, such as full name, username, email address, phone number, billing country, and account identifiers.

Account and profile data, such as password hash records, authentication logs, subscription status, order history, support interactions, booking records, learning progress, and user preferences.

Payment and billing data, such as top-up history, internal balance ledger entries, payment provider references, invoice data, refund records, chargeback events, and fraud review notes.

Technical and device data, such as IP address, device type, browser type, cookie identifiers, operating system information, language preferences, and diagnostic logs.

Communications and content data, such as support messages, consultation notes, uploaded files, feedback, testimonials, or community posts where such features are enabled.

### 4. Sources of Data

We may collect data directly from the user, automatically from the user's device and browser, from payment providers, from analytics and anti-fraud vendors, from communication tools, and from other lawful third-party sources connected to the operation of the Platform.

## 5. Purposes of Processing

To create and manage user accounts, authenticate users, deliver courses and consultations, provide customer support, and operate core service functions.

To process top-ups, keep internal account balance records, debit service fees from the internal balance, issue invoices and confirmations, detect suspicious activity, and resolve billing disputes.

To maintain platform security, prevent abuse, monitor service quality, improve user experience, conduct internal reporting, and debug technical issues.

To send service notices, transactional messages, legal notices, support follow-ups, and, where permitted, promotional communications.

## 6. Legal Bases

Depending on the situation, the Company may process personal data because it is necessary to perform a contract, comply with legal obligations, pursue legitimate interests such as fraud prevention and service improvement, or because the user has given consent for a specific processing activity.

## 7. Cookies and Tracking Technologies

The Platform may use cookies, local storage, SDKs, pixels, log files, and similar technologies.

## 8. Sharing of Data

We may disclose personal data to hosting providers, cloud infrastructure vendors, analytics providers, customer support systems, email vendors, payment processors, anti-fraud partners, accountants, legal advisers, or competent authorities where necessary and lawful.

## 9. International Transfers

Where data is transferred across borders, the Company should use an appropriate transfer mechanism required by applicable law.

## 10. Data Retention

Personal data is kept only for as long as reasonably necessary for the purposes described in this Policy.

## 11. User Rights

Depending on applicable law, users may have rights to access, correct, update, delete, restrict, object to, or port personal data.

## 12. Security

The Company uses reasonable technical and organizational measures intended to protect personal data.

## 13. Children's Data

The Platform is not directed to children unless expressly stated.

#### 14. Changes to This Policy

The Company may update this Privacy Policy from time to time.