

PRIVACY POLICY

Citadail Escrow
Website: offthechart.xyz

Effective Date: June 12, 2025

1. INTRODUCTION

Citadail Escrow ("we," "our," or "us") is committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website (offthechart.xyz) and use our escrow services.

2. INFORMATION WE COLLECT

2.1 Personal Information We may collect personal information that you voluntarily provide, including:

- Name, address, phone number, and email address
- Government-issued identification documents
- Financial information (bank account details, payment information)
- Business information (company name, tax identification numbers)
- Transaction-related documentation and communications

2.2 Automatically Collected Information When you visit our website, we automatically collect:

- IP address and device information
- Browser type and version
- Operating system information
- Website usage data and analytics
- Cookies and similar tracking technologies

2.3 Third-Party Information We may receive information about you from:

- Credit reporting agencies
- Identity verification services
- Banking and financial institutions
- Transaction counterparties
- Public records and databases

3. HOW WE USE YOUR INFORMATION

We use your information to:

- Provide and maintain our escrow services
- Process transactions and payments
- Verify your identity and prevent fraud
- Communicate with you about your transactions
- Comply with legal and regulatory requirements
- Improve our website and services
- Send important notices and updates
- Respond to customer service requests

4. INFORMATION SHARING AND DISCLOSURE

4.1 Service Providers We may share your information with trusted third-party service providers who assist us in:

- Payment processing
- Identity verification
- Customer support
- Website analytics
- Legal and compliance services

4.2 Transaction Parties As part of our escrow services, we may share relevant information with:

- Other parties to your transaction (buyers, sellers, agents)
- Legal representatives of transaction parties
- Court-appointed receivers or administrators

4.3 Legal Requirements We may disclose your information when required by law or in response to:

- Court orders, subpoenas, or legal process
- Law enforcement requests
- Regulatory investigations
- National security requirements
- Anti-money laundering (AML) reporting obligations

4.4 Business Transfers In the event of a merger, acquisition, or sale of assets, your information may be transferred as part of the business transaction.

5. DATA RETENTION

We retain your personal information for as long as necessary to:

- Fulfill the purposes outlined in this policy
- Comply with legal and regulatory requirements
- Resolve disputes and enforce agreements
- Maintain business records as required by law

Generally, we retain transaction records for a minimum of seven (7) years after transaction completion.

6. DATA SECURITY

We implement appropriate technical and organizational measures to protect your information, including:

- Encryption of data in transit and at rest
- Secure server infrastructure
- Access controls and authentication
- Regular security assessments
- Employee training on data protection

However, no method of transmission over the internet is 100% secure, and we cannot guarantee absolute security.

7. YOUR PRIVACY RIGHTS

Depending on your location, you may have the following rights regarding your personal information:

7.1 Access and Portability

- Request access to your personal information
- Receive a copy of your data in a portable format

7.2 Correction and Updates

- Request correction of inaccurate information
- Update your account information

7.3 Deletion

- Request deletion of your personal information (subject to legal retention requirements)

7.4 Restriction and Objection

- Restrict processing of your information
- Object to certain uses of your data

To exercise these rights, please contact us using the information provided below.

8. COOKIES AND TRACKING TECHNOLOGIES

8.1 Types of Cookies We use the following types of cookies:

- Essential cookies (necessary for website functionality)
- Analytics cookies (to understand website usage)
- Functional cookies (to remember your preferences)

8.2 Cookie Management You can control cookies through your browser settings. However, disabling certain cookies may affect website functionality.

9. THIRD-PARTY LINKS

Our website may contain links to third-party websites. We are not responsible for the privacy practices of these external sites and encourage you to review their privacy policies.

10. INTERNATIONAL DATA TRANSFERS

Your information may be transferred to and processed in countries other than your own. We ensure appropriate safeguards are in place for such transfers in compliance with applicable laws.

11. CHILDREN'S PRIVACY

Our services are not intended for individuals under 18 years of age. We do not knowingly collect personal information from children under 18.

12. CALIFORNIA PRIVACY RIGHTS

California residents have additional rights under the California Consumer Privacy Act (CCPA), including:

- Right to know what personal information is collected
- Right to delete personal information
- Right to opt-out of the sale of personal information
- Right to non-discrimination for exercising privacy rights

We do not sell personal information to third parties.

13. GDPR COMPLIANCE

For users in the European Economic Area, we process your data in accordance with the General Data Protection Regulation (GDPR). Our legal bases for processing include:

- Contractual necessity
- Legal obligations
- Legitimate interests
- Consent (where applicable)

14. UPDATES TO THIS POLICY

We may update this Privacy Policy periodically. We will notify you of material changes by posting the updated policy on our website and updating the "Effective Date."

15. CONTACT INFORMATION

If you have questions about this Privacy Policy or wish to exercise your privacy rights, please contact us:

Privacy Officer

Citadail Escrow

Email: privacy@offthechart.xyz

For GDPR-related inquiries, you may also contact our Data Protection Officer at dpo@offthechart.xyz.

16. REGULATORY COMPLIANCE

This Privacy Policy is designed to comply with applicable privacy laws, including:

- California Consumer Privacy Act (CCPA)
- General Data Protection Regulation (GDPR)
- Gramm-Leach-Bliley Act (GLBA)
- Other applicable state and federal privacy laws

Last Updated: June 12, 2025