

Privacy Policy

Mandela Digital | MUSD Early Access Programme

Important Notice: The Mandela Dollar (MUSD) is currently a proposed stablecoin framework and is not yet live on any exchange or blockchain. This Privacy Policy applies to your use of the mandela.digital website and your participation in the MUSD Early Access Programme.

1. Introduction & Who We Are

Mandela Digital ("Mandela Digital", "we", "us", or "our") is the joint venture formed by:

- Unity Reserve Holdings L.L.C.
- Mandela Dlamini & Manaway L.L.C.
- Datavault AI Inc. (NASDAQ: DFLT)

We operate the website at mandela.digital and administer the MUSD Early Access Programme (the "Programme"). This Privacy Policy explains how we collect, use, store, share, and protect your personal information when you interact with our website and/or apply to participate in the Programme.

We are committed to protecting your privacy and handling your personal data with transparency, integrity, and the highest level of care values that are central to the mission of the Mandela Digital.

Data Controller: Mandela Digital

Contact: info@mandela.digital

2. Information We Collect

We may collect and process the following categories of personal information:

2.1 Information You Provide Directly

Category	Examples
Identity Information	Full legal name, date of birth, nationality
Contact Information	Email address, phone number, postal address
Professional Information	Organisation name, job title, jurisdiction of operation
Application Data	Responses to Early Access Programme application questions
Communications	Messages sent to us via email or contact forms

2.2 Information Collected Automatically

When you visit our website, we automatically collect certain technical data:

Category	Examples
Usage Data	Pages visited, time on page, links clicked
Technical Data	IP address, browser type and version, device type, and operating system
Cookie Data	Session identifiers, preference settings (see Section 9)
Referral Data	The URL from which you arrived at our site

2.3 Information from Third Parties

Where necessary for compliance purposes during the Early Access Programme, we may receive information from identity verification service providers (KYC/AML), sanctions screening databases (e.g., OFAC, UN, EU), and publicly available sources like company registries.

3. How We Use Your Information

We use your personal information for the following purposes:

Purpose	Legal Basis (GDPR)
To respond to enquiries	Legitimate interests
To administer the Programme	Performance of a contract
To assess eligibility	Legal obligation / Legitimate interests
To conduct KYC/AML screening	Legal obligation
To send programme updates	Consent (withdrawable)
To improve website experience	Legitimate interests
To detect and prevent fraud	Legal obligation / Legitimate interests

We do **not** use your personal information for automated decision-making or profiling in a manner that produces legal effects.

4. Legal Bases for Processing (GDPR)

Where the General Data Protection Regulation (GDPR) applies, we rely on the following:

- **Consent:** For subscribing to communications.
- **Performance of a Contract:** For Early Access Programme participation.
- **Legal Obligation:** For AML/KYC obligations and regulatory reporting.

- **Legitimate Interests:** For website improvement and fraud prevention.

5. Data Sharing and Disclosure

We do not sell your personal data. We may share your information with:

5.1 Service Providers

Third-party vendors including website hosting, email platforms, and KYC/AML identity verification providers.

5.2 Joint Venture Partners

Personal data relevant to Programme administration may be shared with our founding partners: Unity Reserve Holdings L.L.C., Mandela Dlamini & Manaway L.L.C., and Datavault AI Inc..

5.3 Regulatory Authorities

We may disclose data to governmental or law enforcement agencies where required by applicable law or regulatory directive.

6. International Data Transfers

Mandela Digital operates across multiple jurisdictions including the United States and the United Kingdom. Where transfers involve data from the UK or EEA, we ensure adequate safeguards are in place, such as Standard Contractual Clauses (SCCs).

7. Data Retention

Data Type	Retention Period
Programme Application Data	Duration of Programme + 5 years
KYC/AML Records	Minimum 5 years (per AML regulations)
Website Analytics	Up to 26 months

Data Type	Retention Period
Marketing Preferences	Until consent is withdrawn + 1 year

8. Your Rights

Depending on your jurisdiction, you may have rights including Access, Rectification, Erasure, Restriction, and Data Portability. To exercise these, contact info@mandela.digital.

9. Cookies

Type	Purpose
Essential	Necessary for website function.
Analytics	To understand visitor behaviour.
Marketing	Track interactions for relevant content.

10. Data Security

We implement industry-standard security measures, including encryption in transit (TLS/HTTPS).

11. Children's Privacy

Our services are not directed at individuals under the age of 18. We do not knowingly collect personal information from minors.

12. Third-Party Links

This Policy applies solely to mandela.digital. We are not responsible for the privacy practices of third-party sites linked from our platform.

13. Changes to This Policy

We may update this Policy to reflect changes in legal requirements or the development of the Mandela Digital ecosystem. Material changes will be notified via our website or email.

14. Contact Us

Email: info@mandela.digital
