



# GDPR COMPLIANCE FRAMEWORK

## MW3BIZ Token Platform

UK GDPR & Data Protection Act 2018

**ICO Registration: ZB668589**

Issued by:

**MW3.biz International Business Ltd.**

UK Company Registration: 12832838

Issue Date: December 2025

Version 1.0

## 1. Introduction

**MW3.biz International Business Ltd.** ("the Company") is committed to protecting personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This framework documents the Company's approach to data protection compliance for the MW3BIZ token platform and associated services.

This document serves as evidence of our data protection compliance measures and should be read in conjunction with our Privacy Policy and Terms of Service.

### ICO REGISTRATION CONFIRMED

Registration Number: **ZB668589**

Data Controller: MW3.biz International Business Ltd.

Verify: <https://ico.org.uk/ESDWebPages/Entry/ZB668589>

## 2. Data Controller Details

Detail	Information
Data Controller	MW3.biz International Business Ltd.
Company Number	12832838
ICO Registration	<b>ZB668589</b>
Registered Address	33 Brandsby Grove, Hull, HU9 4LJ, UK
Data Protection Contact	legal@mw3.biz
Website	<a href="https://mw3.biz">https://mw3.biz</a>

## 3. Lawful Basis for Processing

Under Article 6 of the UK GDPR, the Company processes personal data on the following lawful bases:

### 3.1 Contractual Necessity (Article 6(1)(b))

Processing necessary to perform our contract with users, including:

- Account creation and management
- Platform service delivery
- Customer support provision
- Transaction processing and record keeping

### 3.2 Legitimate Interests (Article 6(1)(f))

Processing necessary for legitimate interests pursued by the Company:

- Platform security and fraud prevention
- Service improvement and analytics
- Network and information security
- Business administration and planning

### **3.3 Consent (Article 6(1)(a))**

Processing based on freely given, specific, informed consent:

- Marketing communications and newsletters
- Optional analytics and cookies
- Third-party integrations requested by user

### **3.4 Legal Obligation (Article 6(1)(c))**

Processing necessary to comply with legal obligations:

- Tax and accounting records retention
- Regulatory reporting requirements
- Law enforcement cooperation when legally required

## 4. Data Subject Rights

The Company respects and upholds all data subject rights under UK GDPR. Users may exercise any of these rights by contacting [legal@mw3.biz](mailto:legal@mw3.biz).

Right	Article	Status
Right to be Informed	Articles 13-14	IMPLEMENTED
Right of Access	Article 15	IMPLEMENTED
Right to Rectification	Article 16	IMPLEMENTED
Right to Erasure	Article 17	IMPLEMENTED
Right to Restrict Processing	Article 18	IMPLEMENTED
Right to Data Portability	Article 20	IMPLEMENTED
Right to Object	Article 21	IMPLEMENTED
Automated Decision Rights	Article 22	IMPLEMENTED

### 4.1 Response Timeframes

The Company commits to responding to all data subject requests within **one calendar month** of receipt. For complex requests, this may be extended by a further two months with notification to the data subject.

## 5. Technical and Organisational Measures

In accordance with Article 32 of UK GDPR, the Company implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

### 5.1 Technical Measures

Measure	Implementation
Encryption in Transit	TLS 1.3 for all data transmissions
Encryption at Rest	AES-256 encryption for stored personal data
Access Controls	Role-based access control (RBAC) with least privilege
Authentication	Multi-factor authentication for administrative access
Audit Logging	Comprehensive logging of all data access and modifications
Backup & Recovery	Regular encrypted backups with tested recovery procedures
Network Security	Firewalls, intrusion detection, DDoS protection

### 5.2 Organisational Measures

- Data Protection Training:** Regular training for all staff handling personal data
- Data Minimisation:** Collection limited to data necessary for stated purposes
- Retention Policies:** Defined retention periods with automated deletion schedules
- Vendor Management:** Due diligence and data processing agreements with all processors
- Incident Response:** Documented breach response procedures with 72-hour notification commitment
- Privacy by Design:** Data protection considered at system design stage

## 6. Data Categories and Retention

Data Category	Purpose	Retention Period
Account Data	Service provision	Duration of account + 2 years
Transaction Records	Legal/tax compliance	7 years
Support Communications	Service improvement	3 years
Security Logs	Security monitoring	1 year
Marketing Preferences	Marketing consent	Until consent withdrawn

## 7. International Data Transfers

Where personal data is transferred outside the UK, the Company ensures appropriate safeguards are in place in accordance with Chapter V of UK GDPR.

### 7.1 Transfer Mechanisms

- **Adequacy Decisions:** Transfers to countries with UK adequacy decisions
- **Standard Contractual Clauses:** UK IDTA or EU SCCs with UK Addendum where required
- **Supplementary Measures:** Additional technical measures where necessary based on Transfer Impact Assessment

## 8. Data Breach Procedures

The Company maintains documented procedures for detecting, reporting, and investigating personal data breaches in accordance with Articles 33 and 34 of UK GDPR.

### 8.1 Notification Commitments

Notification Type	Timeframe
ICO Notification (where required)	<b>Within 72 hours</b>
Data Subject Notification (high risk)	<b>Without undue delay</b>

## 9. Supervisory Authority

The Company's supervisory authority is the **Information Commissioner's Office (ICO)**. Data subjects have the right to lodge a complaint with the ICO if they believe their data protection rights have been violated.

ICO Contact	Details
Website	<a href="https://ico.org.uk">https://ico.org.uk</a>
Helpline	0303 123 1113
Address	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 10. Blockchain-Specific Considerations

As a blockchain-based platform, MW3BIZ has specific data protection considerations:

### 10.1 On-Chain vs Off-Chain Data

- **On-Chain Data:** Wallet addresses and transaction hashes are recorded on the public Solana blockchain. These are pseudonymous and not directly linked to personal identity without additional information.
- **Off-Chain Data:** Personal data (names, email addresses, identity documents) is stored off-chain in encrypted databases under the Company's control.

### 10.2 Right to Erasure and Blockchain

Due to the immutable nature of blockchain technology, on-chain transaction records cannot be deleted. However:

1. All off-chain personal data can be fully deleted upon request
2. The link between wallet addresses and personal identity can be severed
3. Without the linking data, on-chain records become effectively anonymous

## 11. Compliance Review

This GDPR Compliance Framework is reviewed and updated:

- Annually as a minimum
- Upon significant changes to data processing activities
- Following any data protection incidents
- When regulatory guidance is updated

## 12. Contact Information

For data protection enquiries or to exercise your rights, contact:

- **Email:** [legal@mw3.biz](mailto:legal@mw3.biz)
- **Website:** <https://mw3.biz/privacy>
- **Post:** Data Protection, MW3.biz International Business Ltd., 33 Brandsby Grove, Hull, HU9 4LJ, UK

---

#### Authorised by:

MW3.biz International Business Ltd.  
Data Protection Lead

**Issue Date:** December 2025

**Version:** 1.0

**Next Review:** December 2026