

COA HOLDINGS – Privacy Policy & Data Protection

1. Introduction COA HOLDINGS, LLC (USA) and its regional logistics agent COA HOLDINGS PRIVATE COMPANY (Greece), operating under the global brand CITY ON ART, are committed to protecting the privacy and personal data of our institutional clients, private collectors, and artists. This policy outlines how we collect, use, store, and safeguard your data across our digital platforms (cityonart.com and coaholdings.gr).

2. Data We Collect To maintain the highest standards of art asset management, transparency, and regulatory compliance, we collect:

- **Identity Data:** Full name, government-issued identification, and corporate registration documents (required strictly for KYC/AML verification).
- **Contact Data:** Email address, phone number, physical and billing addresses.
- **Asset & Provenance Data:** Technical documentation, high-resolution imagery, and historical ownership records associated with art assets registered in our e-Museum or transacted through our Fine Art Marketplace.
- **Technical Data:** IP addresses, cookie identifiers, and usage data to optimize security and platform performance.

3. Legal Basis and Purpose of Processing We process personal and corporate data under the following legal grounds:

- **Contractual Necessity:** To execute art transfer agreements, white-glove logistics, and secure escrow coordination.
- **Legal Compliance:** To strictly adhere to international banking regulations, corporate transparency laws, and anti-money laundering (AML) directives.
- **Legitimate Interests:** To issue secure Digital Product Passports (DPP) using Blockchain and NFC technology, ensuring immutable provenance.

4. Data Retention and International Transfers Data is securely archived for the minimum period required by US and EU corporate and tax laws. Given the global architecture of COA HOLDINGS, data may be securely transferred between our US Headquarters and our regional hubs in the Netherlands, Greece, and South Korea, fully protected under standard contractual clauses (SCCs) and GDPR-compliant protocols.