

Privacy Policy

I. Scope of the Policy

Your privacy and Personal Data are protected by the Company, where this Privacy Policy indicates how we gather, manage, store, and use the data you give us when using our Site and Services. In addition, this Policy states the methods for gathering, maintaining, processing, and disclosing your information to third parties.

We uphold transparency when obtaining and handling your Personal Data. Therefore, it is necessary that you are knowledgeable of all the conditions and risks to make informed decisions related to your Personal Data.

Although we cater to broad categories of users, persons under 18 years old are not permitted to utilize our services. We do not knowingly collect or seek information from anybody under the age of 18 or knowingly allow them to access our facilities. If we learn that a minor's data has been collected, we will take all reasonable steps to have it deleted as soon as possible.

II. Interpretations

In the context of this Policy, unless otherwise stated, the term "Personal Data" refers to the Client or User's information provided to the Company.

"Privacy Policy" refers to this document that outlines the terms and conditions of processing the Client's Personal Data.

"Processing" and "treatment" refer to any action taken on Personal Data, including its collection, recording, structuring, storage, modification, access, and use. It includes disclosure by transmission, dissemination, or other accessibility, combination or reconciliation, restriction, erasure, or disposal.

In this Policy, "Services" refer to the Company's offered resources to Clients.

"Site" refers to the Company's official website.

In the context of this Policy, unless otherwise stated, "User" refers to the official Client that uses the Company's services.

III. Treatment of the Personal Data

What's our purpose for collecting and processing your Personal Data?

Your Personal Data enables us to perform our business and administrative activities in compliance with the relevant legal and regulatory requirements. Additionally, we gather your information to offer you our Services and improve your User experience on our Site, including making the appropriate updates to our Site and Services.

We use various resources to grant you access to and control your Personal Data. In this regard, you can contact us via the available communication means at any time to check your Personal Data, ask for its update or deletion, ask us to cease using it for a specific purpose, or request that we transfer your information to a different party.

Specifically, we may process your Personal Data when any of the following occurs, without limitation:

- Upon your request, we may gather your Personal Data and provide it to third parties to receive your contact information.
- We may process your Personal Data to respond to your inquiries, requests, and other claims related to your use of our Services.
- Your Personal Data may be processed out of legal obligations.
- In compliance with the applicable agreements, laws, and regulations, we may process your Personal Data to secure our rights, properties, and interests, including those of the relevant third parties. For example, such treatment may be for filing, exercising, or defending legal claims.
- Your Personal Data may be processed to detect unlawful activities and protect the relevant parties from fraud and unauthorized use of the Services.
- We may process your Personal Data to enhance our Services, including monitoring any error logs and other Service-related anomalies.
- We may process your Personal Data to execute and maintain our business operations, such as back-office tasks, commercial development efforts, strategic decision-making, and monitoring methods.

How and when do we collect your Personal Data?

We gather your Personal Data whenever you use one of our facilities and Services, get in touch with us via our communication means, or visit the Site. In some cases, you may voluntarily provide your Personal Data, but in other cases, we may obtain it by reviewing and monitoring your use of our Services and facilities.

You are not required to divulge your Personal Data, but in some cases, failing to provide us with such Personal Data may prevent us from providing you with the relevant Services, prevent you from using the Site, or result in the failure of our facilities and the Site.

What Client information do we collect?

When you contact us or fill out any of our electronic forms, we may collect your information, such as your full name, email, contact number, and address.

In compliance with the applicable Know-Your-Customer ("KYC") regulations, we may require you to provide personal records such as identity and residential documents for verification purposes.

Furthermore, we collect the following information when you visit our Site:

- IP address
- Type of browser used
- User device's information
- Date and time of Site visit
- Web/mobile pages visited when accessing the Site
- Preferred language

Some of the mentioned information might not be personally identifiable to the User. Therefore, such information may not qualify as Personal Data.

You hereby acknowledge that the Company may disclose the Personal Data to relevant third parties when it sees fit.

You acknowledge that when you allow the Company to collect your Personal Data, we may process it for one or more defined purposes. For example, this procedure applies when you explicitly permitted us to share your information with other parties through the Site. Such treatment may be necessary for legitimate business interests, to fulfill a legal requirement, to protect the Company or the relevant third party's legal rights, and improve our Services.

IV. Disclosure of Data to Third Parties

You consent to the possibility that your Personal Data can be disclosed to the relevant third parties, such as our service providers, related organizations, business partners, and affiliates. Some of our service providers include host and backup storage, IP address records, user analysis, and statistical and technical services.

We may provide your Personal Data to third-party Bitcoin trading hubs upon your request. In such a case, we will provide your information to the relevant third parties where you acknowledge that their use of your Personal Data is subject to their applicable privacy terms.

When we disclose your Personal Data out of legal obligations, we have the right to provide it to federal, state, local, and other regulatory bodies.

Furthermore, we reserve the right to provide your Personal Data to potential financiers, investors, and buyers of the Company and any other businesses in the group to which our Company belongs.

On the subject of information disclosure, the Company is not obligated to disclose the following:

- Name of our investors, whether individuals, corporations, or organizations
- Any Company information related to a merger, restructuring, consolidation, or the Company's bankruptcy, including those of our affiliates
- Company transactions, including asset sales

V. Third-party Services

Our Site may contain third-party services, such as analytical firms or corporations that run adverts on our Site. These third-party service providers might use Cookies and other information technologies where they are subject to their separate privacy terms.

VI. Cookies

What are Cookies?

Cookies are small text files that can be stored on your device upon accessing our Site. These cookies allow us to collect data related to your use of our Site, which can help us improve your User-experience, such as remembering your preferences and settings, customizing and delivering products, and providing other services significant to your use of our Site.

What are the Cookies we use?

Some of the cookies we use are known as session cookies, which are temporarily stored on your device and only last until you leave the Site. We may also use persistent cookies which continue to exist on your device even after you have stopped using the Site. When you revisit the Site, these persistent Cookies help the Site recognize you as a previous visitor.

The following types of cookies may be stored on your device, depending on your device or browser settings:

- **“Strictly necessary cookies”** are used to provide basic Site functions, where they are essential to access Site features, including signing in or electronic billing. Additionally, these cookies allow the User to navigate back and forth between pages without losing the previous actions from the same session.
- **“Session cookies”** are temporary cookies that expire when you log off or exit the page. This cookie enables the essential Site functions, including retaining your ongoing Site transactions. In other words, session cookies are necessary so you do not lose your ongoing Site transactions.

- “**Persistent cookies**” are stored on your device to remember data, preferences, settings, or log-in credentials that you previously saved on the Site.
- “**Functionality cookies**” allow the Site to remember your preferences and choices, including username, region, and language. This cookie also lets the Site provide personalized features depending on your settings. It is important to note that this cookie does not track browsing activity across other websites.
- “**Performance cookies**” are used to collect data on how you use our Site, which pages of the Site are most visited, and if the User gets an error message on our Site pages. This cookie enables us to monitor our Site’s performance while the User interacts with it, but it does not collect identifiable information, which means all collected data is anonymous and only used to improve our Site.

How do you block and remove Cookies?

You can change your browser’s settings and block or remove some or all existing cookies, but it’s important to note that removing cookies from your browser may prevent you from accessing some or all of the Site’s features and functions.

VII. Personal Data Retention

The Company will only keep your Personal Data for as long as necessary to process such data following this Privacy Policy and our Terms of Use. However, our Personal Data retention may extend if relevant laws, rules, policies, or court orders require it.

VIII. Disclosure to International Jurisdictions

The Company has the right to disclose your Personal Data to international organizations and a third country, i.e., jurisdictions other than where you reside.

If you are a resident of the European Economic Area (“EEA”) and your Personal Data is to be processed internationally, we will take the appropriate measures to secure your information, subject to enforceable rights and effective legal remedies. Furthermore, we

enforce the appropriate operational measures to protect your stored and processed Personal Data.

Additionally, the relevant preventive measures are taken in case of unexpected situations, including but not limited to posed risks of processing, whether accidental or unlawful destruction of information, corruption, loss, and unauthorized access to the Personal Data.

In cases of legal responsibilities and other obligations beyond our control, we may disclose your Personal Data to third parties, including state authorities, where our ability to protect your Personal Data may be limited.

We do not warrant the complete security of online transfers of any Personal Data. Therefore, we cannot guarantee your Personal Data's safety when you submit it online.

IX. Third-party Links and Sites

Our Site may contain third-party links, sites, and software programs, where you agree that we are not responsible for the content, privacy policies, or practices of any third-party websites or services that may be linked to through our Site. Accordingly, we are not accountable for such third parties' privacy and data security policies, and this Policy does not cover activities conducted through these third-party websites or apps.

You are responsible for acknowledging the relevant third party's terms of use and privacy policies before using them or sharing any personal information.

X. Rights of a Data Subject

Right to access

You have the right to confirm with the Company regarding the information of processing your Personal Data, as follows:

- The purpose of processing your Personal Data and its categories
- The receiver of the Personal Data, whether individual or group of recipients, including third-party jurisdictions outside of the EEA and other international organizations

- The applicable measures related to processing the Personal Data when transferred to third-party jurisdictions outside of the EEA and other international organizations
- The Personal Data's retention period on the Company's system or its criteria to establish the duration
- Source of the Personal Data if it was not acquired from the User
- How profiling is used

The Company can provide you a list of information on what Personal Data it collects upon your official written request. You agree to settle the charged fee for any additional copies of the information you request. Additionally, if your request were submitted via email, the requested datum would be provided through the Company's official communication unless we specify otherwise. The request to receive a copy of your Personal Data must not breach the rights and privileges of others.

Right to object

You have the right to object to how your Personal Data is handled, whether based on legitimate interests pursued by the Company or a third party, including profiling based on the relevant lawful concerns. In such a case, your Personal Data will not be processed further unless there are legal grounds that override your rights, privileges, and interests or are in compliance with the enforcement, establishment, or defense of legal claims. Moreover, you are allowed to explicitly object when your Personal Data is used for direct marketing, including when profiling is connected with such direct marketing.

Right to rectify

You are entitled to request a modification to any of your inaccurate or outdated Personal Data. The Company will update any information immediately upon request, and you may submit the necessary information via email.

Right to erasure and blocking

You have the right to suspend, withdraw, or order the removal, blocking, and destruction of your Personal Data if, upon discovery and substantial proof, your information is false,

outdated, incomplete, obtained unlawfully, used for unauthorized purposes, or are no longer necessary for the purposes for which they were collected.

Your Personal Data will also be removed upon request if it complies with a legal requirement of the European Union's law or a Member State relevant to the Company. However, this right is not applicable if the processing is required to carry out a legal obligation governed by the EU or Member State legislation or when the processing is required for the assertion, exercise, or defense of legal claims.

Right to limit processing

You may request the Company to limit the processing of your Personal Data if any of the following conditions apply:

- There is a dispute to correct your Personal Data's accuracy where we will restrict its processing to verify its correctness
- The processing of your Personal Data was unlawful, but you do not intend to remove them from our system and instead request process restriction
- We no longer need your Personal Data for its treatment purposes, but you need it stored to pursue or defend legal claims
- The processing of your Personal Data is mandatory to our lawful interests or of a relevant third party's unless we have lawful reasons that override your rights, privileges, and interests, or if we need to pursue or defend legal claims
- Your Personal Data was used for direct marketing, including profiling

If your Personal Data's processing has been restricted upon your request, your information will only be processed with your explicit consent and if it is to establish, exercise, or defend legal claims. Additionally, such processing may include protecting any other natural person or a legal entity's rights based on a significant public interest of the EU or a Member State.

Right to data portability

You have the right to obtain and electronically transfer, copy, or move your Personal Data for further use if you consented to such a process or if it is based on a contract where you are a party. If possible, you may request your Personal Data transferred directly from us to

another controller. However, such transfer, copy, or process must not breach the rights and privileges of others.

Amendments to this Policy

We have the exclusive rights to amend and modify the conditions of this Policy without prior notification, effective immediately. We are not obliged to notify you about the changes to this Policy, whether or not the changes are significant or relevant to you.