



## Privacy Policy

We are dedicated to securing your personal data and privacy.

This privacy policy has been established to inform you about how we handle, gather, maintain and utilize the data you provide in relation to our web site.

We are dedicated to the following principles:

- Be truthful about the gathering and handling of your personal data: It is always important to Us that you are provided with all the information necessary to make informed choices about the processing of Personal Data about you. To this end, We will use various techniques and procedures to provide you with appropriate information about the processing of your Personal Data in the appropriate form and at the right
- Processing Personal Data about you only for purposes described in the Policy:
- The uses for which We can process Personal Information about you include, Our Website at your disposition and to provide the services included therein (the “Services”), to enhance the user experiences on Our Website, to upgrade Our Services (including the Website), to secure Our rights and protect Our interests, to perform commercial and administrative activities that support the delivery of Our Services to Our users, and/or to meet any legal and/or regulatory requirements.
- In furtherance of these purposes, We will treat Personal Data about you to understand your personal needs and
- Invest substantial resources to fulfill your rights with respect to your Personal Data: We implement extensive resources to enable You to exercise Your data subject Accordingly, you

may contact Us any time you wish to review your Personal Data, ask Us to modify it, delete it, stop using it for specific uses or in general, or to transfer it to you or to a 3rd party. We will respond to your requests in a lawful manner.

- To secure your personal data:
- While We can not promise complete security of your Personal Data, We can guarantee that We use and will use a variety of means and measures to ensure the security of your Personal

This Policy outlines the type of Personal Data that the Company gathers about individuals, and how it is obtained, used, stored, shared with third parties, secured, processed, etc. In this Policy, “Personal Information” means any data about an identified or identifiable individual. An identifiable individual is one who can be identified, either personally or in conjunction with additional Information in Our custody or to which We have direct access. In this Policy, “ treatment ” of Personal Data means any operation or set of operations carried out on Personal

Data, including the collection, recording, structuring, storage, modification, access, use, disclosure by transmission, dissemination or otherwise making accessible, combination or reconciliation, restriction, erasure or disposal of Personal Data.

Our Services are directed to a broad audience and are not intended for children under the age of 18. We do not knowingly collect or seek out information from anyone under the age of 18, nor do We consciously allow such individuals to access our Facilities. If We learn that a child’s information has been collected, We will take all reasonable steps to remove that information as soon as possible.

When do we gather personal data about you?

We collect information about you each time you use our Facilities, use our service channels, use the Website and/or contact us. In some cases, you will be actively providing us with Personal Data, and in other instances, we will collect Personal Data about you by reviewing and monitoring your use of Our Services and/or service channels.

#### No Requirement to Provide the Company with Personal Data and its Consequences

There is no obligation on you to supply Us with any Personal Information about yourself. In some cases, however, not providing such Personal Data will result in Us not being able to deliver the Facilities to you, preventing your use of the Website, and/or resulting in the dysfunction of Our Facilities and the Website.

#### What Personal Data do we collect about you?

The Personal Data We collect each time you browse the Website: this will include online activity logs, site traffic information (including, but not limited to, IP address, time of entry, date of entry, web and mobile site page(s) visited, language preference, software crash records, and type of browser used), and details of the device you have used. Some of this information may not personally identifiable to you, and therefore does not qualify as Personal Data.

Personal Data we collect from you: any Personal Data you voluntarily provide to us by contacting us.

Personal Data that you provide to us specifically for submission to third parties: this would include your name and email address.

#### The Purposes of processing Personal Data and their legal grounds

The Company will process your Primary Information for one or more of the reasons described in this

section and on the relevant legal basis. The Society will not otherwise process Personal Data about you unless there is a legal basis for such the processing. The legal bases under which the Corporation may process Personal Data about you are as following:

You have given your permission to process your Personal Data for one or more specific purposes. This refers to cases where you have specifically provided us with your details through the Web Site so that we can provide them to third parties. The treatment is required for the purposes of the legitimate interests being pursued by the Company or by a third party. For instance, in order to improve Our Facilities, or for the exercise or defense of legal claims.

The treatment is required to comply with a legal obligation to which the Society is subject.

The following list sets out the reasons for which We may handle Personal Data about you and the legal basis for such handling:

-In order to submit your contact information to third parties at your request We may gather Personal Data about you in order to provide it to third parties if you specifically request it. You have given your permission to process your Personal Data for one or more specific purposes.

-Handling of your Personal Data is necessary to answer your questions, requests and/or claims regarding your use of the Services. The processing is required for the purposes of the legal interests pursued by the Company or by a third party.

-In order to comply with any legal obligation or judicial or official order We are processing Personal Data about you in order to conform to Our different legal obligations. The treatment is required to comply with a legal requirement to which the Company is subject.

-In order to enhance Our Services We may use personal Data about you in order to make Our Services better. Such processing will include, among other things, any fault logs or other malfunction reports received in relation to the Services. The treatment is necessary for the purposes of the legitimate interests being pursued by the Company or by a third party.

-In order to protect against fraud, misuse of our services. The treatment is necessary for the legitimate interests being pursued by the Company or by a third party.

-In order to perform and maintain various operations supporting the provision of Our Services These operate include back office functions, commercial development activities, strategic decision taking, monitoring mechanisms, etc. Processing is necessary for the fulfilment of the legitimate interests sought by the Corporation or by a 3rd party.

-Processing is required for the fulfilment of the legitimate interests pursued by the Company or by a third party. The treatment is necessary for the purposes of the legitimate interests pursued by the company or by a third party.

-In order to protect Our interests, rights and assets and those of third parties, including the initiation, exercise or defence of legal claims We may process Personal Data about you in order to protect Our interests, rights and assets, or those of third parties, in compliance with any law, regulation or agreement.

#### Sharing of Personal Data with 3rd Parties

The Society may also share your Personal Information with others who are providing us with services, such as hosting and backup storage providers, IP address records, user analysis and

analysis, and technical and statistical services. In Additionally, you may request specifically that We provide certain Personal Information about you to 3rd party Bitcoin trading hubs. In this case, We will share the Personal Data you provide to Us for this specific purpose with such third parties, and their use of your Personal Information will be subject to their own confidentiality policies.

The Society may also exchange Personal Data about you with its affiliated entities and business associates who supply the Company with materials to strengthen and enhance the level of services and goods that the Organization provides to its users.

The Corporation may share your Personal Data with federal, state, local and other regulatory authorities, as well as when such sharing is required to safeguard our interests, rights and assets and those of any other parties, including the initiation, exercise or defense of legal claims.

Additionally, we may release your Personal Data to potential purchasers or investors of the Corporation and/or any of the companies in the group of companies of which the Corporation is a member, or to prospective financiers of the Corporation and/or any of the companies in the group of companies of which the Corporation is a member.

Kindly be advised that we are not authorized to release any Company information to any other party in the context of a merger, restructuring, consolidation or bankruptcy of the Company and/or any company of the group of companies of which the Committee is a member, or in connection with any other similar transaction (including the sale of assets of the Company and/ or any company of the group of companies of which the Company is a member), and/or in connection with a merger, reorganization, consolidation or bankruptcy of the Company and/or any company of the group of companies of which the Company is a member. Note that we are not allowed to divulge who our investors are.

## Cookies and Third Party Services

We may use certain third-party services, such as analytics firms or companies that display advertising on our site, which may also use cookies or other information technology, and these practices and suppliers are subject to their own privacy policies.

A cookie (which is a small text file) is stored on the device through which you visit or access the site. Cookies allow us to gather data about you and your behavior in order to improve your user experience, remember your preferences and settings, and personalize and deliver goods and other services that may be of value to you. Cookies may also be used to collect statistics and conduct analysis.

Some of the cookies We may utilize are so-called session cookies, which are temporarily uploaded to your device and last until you shut down your web browser, whereas others are so-called persistent cookies, which stay on your device after you stop navigating the Web site and may be used to help the Web site recall you as a return visitor when you return to the site.

### Types of Cookies:

The cookies We may use are classified according to their function, as follows: Cookie Type Function

#### Additional Information

**Strictly Necessary Cookies** These cookies are strictly required to allow you to browse the Website and use the functionality you have requested. They are used to bring you the content, goods and services you have requested.

Strictly necessary cookies These cookies are strictly necessary to allow you to browse the website and use the features you have requested. They are used to provide you with the content, products and services you have requested.

These cookies are essential to help your device download or deliver information so that you can navigate the Website, use its features, and return to pages you previously visited. These cookies collect Personal Information about you, such as your user name and last login date, and identify you as being connected to the Website.

These cookies are deleted when you close your web browser (session cookies).

Functionality Cookies These cookies are used to recognize you when you return to the Website and allow Us to remember your choices and preferences. These cookies survive the closing of your web browser and last until their applicable expiration time.

Performance Cookies These cookies are used to provide aggregate statistics regarding the performance of the Website and to test and improve that performance, in order to provide a better user experience. In addition, they allow Us to perform analytical functions on the Website. These cookies collect anonymized data that is not linked to an identified or identifiable individual.

These cookies have a variable validity period; some are deleted as soon as you close your browser, while others have an indefinite validity period.

Blocking and Deleting Cookies



You can change your browser settings to block and delete some or all cookies. Please see the links below for instructions on how to do this for some of the most popular web browsers:

- Firefox
- Internet Explorer
- Google Chrome
- Safari

Please note, however, that if you do so, some or all of the features and functionality of the website may not function as intended.

#### Retention of your Personal Data

The Company will retain Personal Data about you for as long as necessary to fulfill the purposes of processing Personal Data as described in this Policy, or for such longer period as may be necessary in accordance with the laws, regulations, policies and orders that apply to Us.

In order to ensure that Personal Data about you is not retained for longer than necessary, We periodically review the Personal Data that We retain to determine whether any of it can be deleted.

#### Transfers of Personal Data to a third country or international organization

Personal Data about you may be transferred to a third country (i.e., jurisdictions other than the one in which you reside) or to international organizations. In such circumstances, the Company will take appropriate safeguards to ensure the protection of your Personal Data and to ensure that data subjects' enforceable rights and effective legal remedies are available to data subjects.

If you are a resident of the EEA (European Economic Area), please note that these safeguards and protection will be available if any of the following conditions are met:

#### Safeguarding your Personal Information

We employ adequate technical and operational measures to provide an appropriate level of protection for Personal Data, taking into consideration the risks of processing, in particular of accidental or unlawful destruction, loss, corruption, unauthorized release or access to the Personal Data submitted, stored or handled in any way.

As a consequence of legal or other obligations beyond Our control, We may be obliged to transfer Personal Data about you to third parties, such as public officials. In such cases, We have limited ability to control the level of security afforded to your Personal Data by such 3rd parties.

Any transfer of Personal Data via the Internet cannot be entirely secure. As a result, the Company cannot ensure the security of your Personal Information when it is transmitted to us via the Internet.

#### Links to 3rd Party Sites

The Site may contain links to third party sites and/or software applications. The Company does not have control over such sites and programs or the collection and/or processing of your Personal Data by such sites and programs, and We are not liable for such sites and programs or for their privacy and data security policies and activities. This Policy does not apply to any actions taken through such relevant websites and/or apps.

When you access such third party sites and/or apps, We suggest that you review their privacy policies carefully before using such sites and/or apps and before you disclose any such personal data.

#### Changes to this Policy

We may change the terms of this Policy from time to time. Whenever we change this Policy, we will notify you by posting the revised Policy on the Website. In addition, when we make significant changes to this Policy, we will make every attempt to notify you of such amendments by such means of disclosure as we deem appropriate to inform you of such changes and by publishing a notice of such changes on the Website. Unless stated otherwise, all changes will be in effect upon posting the Updated Policy on our Website.

In addition, you have the right to ask for confirmation that Personal Data about you is being gathered by Us, to request to review that data, to rectify the content where applicable, and to delete any Personal Information that is no longer needed by Us. You may also limit your consent to certain treatments of your Personal Data.

#### Right of access

You have the right to obtain confirmation from the Company as to whether or not any Personal Information about you is processed and, if so, to have access to the Personal Data and the following information: (1) the purpose of the processing; (2) categories of Personal Data; (3) the addressees or categories of addressees to whom the Personal Information has been or will be disclosed, including addressees in third countries outside the European Economic Area (EEA) or international organizations; (4) if possible, the period of time for which the Personal Data is to be retained or, if

not possible, the criteria used to determine such period; (5) the right to request from the Company the correction or erasure of Personal Data or the restriction of the use of Personal Data about you or to object to such use; (6) the right to lodge a complaint with a regulatory authority; (7) if the Personal Data is not collected from you, any relevant information available as to its source; (8) the existence of profiling; and (9) if the Personal Data is being transferred to a third country outside the EEA or to an international organization, the relevant safeguards relating to the transfer. The Company will provide a copy of the Personal Data being collected and may charge a fair fee for any further copies requested by you. If you make the request electronically, and unless you otherwise request, the material will be provided in a commonly used electronic form. The request to obtain a copy of personal data must not violate the rights and freedoms of others. Therefore, if the request violates the rights and freedoms of others, the Company may not fulfill your request or may do so in a limited manner.

#### Right of Correction

You have the right to obtain from the Society the correction of incorrect Personal Information about you. In view of the objectives of the treatment, you have the right to have the incomplete Personal Data concerning you completed, including by supplying an additional declaration.

#### Right to cancellation

You have the right to have the Company erase Personal Data about you if any of the proposed reasons apply: (a) the Personal Data is no more required for the intended purpose for which it was collected or is otherwise being processed; (b) you revoke your consent on which the treatment is based and there are no other lawful grounds for the treatment; (c) you oppose at any time, on

grounds relating to your particular circumstances, the processing of Personal Data about you which is grounded in the legitimate interests pursued by Us or a third party, and there are no prevailing lawful grounds for the processing ; (d) you object to the treatment of Personal Data about you for direct marketing reasons; (e) the Personal Data has been processed unlawfully; or (f) the Personal Data about you needs to be erased to comply with a legal requirement of the law of the European Union or of a Member State to which the Company is subject. This right is not available to the extent that the processing is necessary (a) for the fulfilment of a legal obligation that requires treatment by European Union or Member State law to which the Society is subject; or (b) for the assertion, exercise or defence of legal claims.

#### Right to limit treatment

You have the right to obtain from the Company the restriction of the processing of Personal Data about you if any of the following situations apply: (a) the correctness of the Personal Data is disputed by you, for a period that allows the Company to check the correctness of the Personal Data about you; (b) the processing is not lawful and you object to the deletion of the Personal Data about you and instead request the restriction of its use; (c) the Society no longer requires the Personal Information about you for the purposes of the treatment, but the Personal Data is required by you for the establishment, pursuit or defence of legal claims; (d) if the Processing of Personal Data about you is required for the purposes of the lawful interests being pursued by the Company or a third party, unless We show compelling legitimate grounds for the Processing which prevail over your interests, rights and freedoms or for the establishing, exercising or defending legal claims; or (e) if the Personal Data about you is processed for the purposes of direct marketing, which includes profiling, insofar as it relates to such direct marketing. If the handling of Personal Data about you

has been restricted following your request, such Personal Data will, with the exclusion of storage, only be handled with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of any other natural or legal person or on grounds of important public interest of the European Union or of a Member State.

#### Right to Data Transfer

You have the right to receive Personal Data about you, which you have provided to the Company, in a format that is structured, generally used and readable by machine, as well as the right to transfer such Personal Data to another processor, if (a) the treatment is based on your consent or on a contract to which you are a party, and (b) the handling is carried out by automated means. In exercising your right to data portability, you have the right to have your Personal Data transmitted directly from the Company to another controller, where this is technically possible. The exercise of your right to data transferability is entirely without prejudice to your and Company's rights under your right to erasure. In accordance with this, the right to data transfer shall not infringe on the rights and liberties of others.

#### Right to object

You have the right to oppose at any time, on the grounds of your specific situation, the treatment of Personal Data about you that is founded on the lawful interests pursued by the Company or by a third party, including the profiling based on such lawful concerns. In this case, We will no further process Personal Data about you, unless We show compelling legal reasons for the treatment that override your interests, rights and liberties or for the establishment, enforcement or defense of legal claims. You have the affirmative right to object at any time to the handling of your Personal Data for

direct marketing purposes, including the use of profiling, to the extent that it is related to such direct marketing.