

PRIVACY POLICY

The following definitions, both in the singular and in the plural, are used in this Privacy Policy (hereinafter: Privacy Policy):

Terms and Conditions – a set of general and special rules on the use of Services by Customer as well as the terms of provision of Services by Service Provider. Terms and Conditions are referred to in Agreement and constitute an integral part of Agreement.

Customer (“Customers” to be understood as equivalent to “Customer”) – in the case of an natural person: one who has signed up as user of Services; in the case of a legal person: each natural person who is directly or indirectly associated with or related to legal person that has signed up as user of Services.

Personal Data - any information related to a natural person that leads directly or indirectly to the identification of that natural person.

Agreement - a legally binding arrangement between the Customer and the Service Provider.

Services – any services, requested by the Customer and performed by the Service Provider under the Agreement.

Service Provider (“Service Provider” to be considered equivalent to “we” or “our” or “us”) – service provider as specified in the Agreement.

Third Parties (“Third Parties” to be understood as equivalent to “Third Party”) – natural and/or legal persons that are neither involved in/associated with Service Provider and/or Services nor involved in/associated with Customer but may be related to either Customer, Service Provider or provision of Services.

Third Person (“Third Persons” to be understood as equivalent to “Third Person”) - natural person(s) that may be directly/indirectly involved in/associated with Customer and may be related to Customer.

Certain terms used in this Privacy Policy, if not defined here, are defined by the Terms and Conditions and Agreement.

I. OVERVIEW

The following Privacy Policy shall govern the lawful, fair and transparent processing of Personal Data of natural persons conducted by Service Provider.

In line with the GDPR changes, we are updating our Privacy Policy so you can better understand why and how we collect, process and erase your data. We are committed to protecting and respecting your privacy. This Privacy Policy (together with the Terms and Conditions and any other documents referred to within) sets out the legal basis on which any Personal Data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

This Privacy Policy shall describe:

- the type of Personal Data we collect
- the legal basis and legal requirements for Personal Data collection,
- the scope, purpose and method of Personal Data collection,
- the security measures to be undertaken to protect any and all collected Personal Data,
- Personal Data management rights,
- the time limit (duration) of storage of collected Personal Data.

II. WHAT PERSONAL DATA DO WE COLLECT?

We collect Personal Data of the Customers signed up as users of our Services. The Customers themselves provide these Personal Data.

We also collect Personal Data of other natural persons (Third Person) provided to us by the Customers in the process of providing our Services.

NOTE:

We will inform you if providing some Personal Data is optional, including if we ask for your consent to process it. In all other cases, if you fail to provide the requested Personal Data, we may be unable to provide you with our Services.

We collect Personal Data when the Customer:

- signs up for our Services;
- uses our Services;

1. The Personal Data we may collect:

- a. First name
- b. Last name
- c. E-mail address
- d. Date of birth
- e. Gender
- f. Address
- g. Phone number
- h. City
- i. Postal Code
- j. Country
- k. Passport or national ID (both sides)

- l. ID card
- m. Recent utility bill (electricity bill / phone bill / bank statement)
- n. Bank account information (name of bank, bank account number SWIFT number)

NOTE:

Personal Data as described under (k) and (l) may be considered biometric data pursuant to provisions of the GDPR and as such are considered special categories of Personal Data and are provided with special protections.

What do we use this Personal Data for?

We collect and process Personal Data to:

- enable you to become the Customer, enter into an Agreement with Service Provider, and may use our Services. Without these Personal Data we are unable to provide you with our Services.
- execute our Agreement with the Customer.

NOTE:

Withdrawal of consent for processing of certain Personal Data (for instance Personal Data under (k) and (l) may result in our inability to provide you with our Services.

III. HOW WE USE YOUR PERSONAL DATA

We may use the Personal Data you provide about yourself to fulfil your requests for our products, programs, and services, to respond to your inquiries about our products, programs, and services, and to offer you other products, programs, or services we believe may be of interest to you. We may also use your Personal Data to administer sweepstakes and contests.

We may use or disclose your information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.

If we consider it necessary, we may disclose your Personal Data to Third Parties in good faith that such disclosure is reasonably necessary to (i) take action regarding suspected illegal activities; (ii) investigate, enforce or apply our Terms and Conditions or this Privacy Policy; (iii) comply with legal process, such as a search warrant, subpoena, statute, or court order; or (iv) protect our rights, reputation, or property or that of our customers, affiliates, the public or other third parties. Please note that we are not required to question or contest the validity of any search warrant, subpoena, or other similar governmental request we may receive.

IV. LEGAL BASIS FOR PROCESING OF PERSONAL DATA

The legal basis for processing of Personal Data:

- Processing is necessary for the performance of Agreement or in order to take steps at the request of the Customer prior to entering into an Agreement;

The processed Personal Data is necessary to enable us to enter into an Agreement with the Customer, to execute the Agreement and provide our Services pursuant to the Agreement within the scope of the Terms and Conditions.

- Processing is necessary for compliance with a legal obligation to which the Service Provider is subject;

Due to the nature of the Services provided by Service Provider, we are legally obligated to process, store, and, if needed, reproduce Personal Data pertaining to legal and financial transactions made by the Customer if so requested by law enforcement agencies; financial regulators and other relevant regulatory authorities; government bodies; tax authorities; courts tribunals and complaints/dispute resolution bodies and other bodies as required by law or regulation if such a request has sound legal basis.

Furthermore, we must process and store certain Personal Data because we are legally obligated to allow the Customer to exercise his or her rights under the GDPR.

- Processing is necessary for the purposes of the legitimate interests pursued by the Service Provider;

We collect your Personal Data for the following legitimate interests:

- Provision of our Services;
- Promotion of ideas and events relating to Services we provide;
- Accuracy of Customer records;
- Maintenance of records of communications and management of your relationship with us;
- To respond to your enquires;
- To comply with any present or future law, rule, regulation, guidance, decision or directive (including those concerning anti-terrorism, fraud, anti-money laundering and anticorruption);
- To carry out, in appropriate cases, KYC checks and other procedures that we undertake prior to you becoming a Customer;
- Prevention and detection of fraud and other illegal activity or misconduct
- For informing you about compliance with legal and regulatory obligations and provide related guidance.

Signature:

- The Customer has given consent to the processing of his or her Personal Data for one or more specific purposes;

Usually, this is the case when you request us to disclose your Personal Data to other people or organisations, or otherwise agree to disclosures.

This is also the case when we process Biometric Data (e.g. Customer' passport or national ID) or other Personal Data declared as special category by GDPR, or when we send you marketing communications where we've asked for your consent to do so.

V. DURATION OF RETENTION OF PERSONAL DATA:

Due to the sensitive nature of our Services, we retain your Personal Data to protect our legitimate business interests and to meet legal obligations for a minimal period required by law, which in any case may be no shorter than 7 years after Termination of the Agreement.

After this period has passed your Personal Data (will be automatically deleted, or/and deleted per your request).

VI. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your Personal Data with the following types of recipients:

- With companies in our business group, sub-contractors, third-party service providers and partners who provide data processing services to us, such as but not limited to payment processing, other payment and money withdrawal issues, legal and financial advisory services, IT-support, etc. All such parties are obligated to use your Personal Data in accordance with our internal privacy manuals, this Privacy Policy and our Terms and Conditions.
- With any competent law enforcement body, regulatory authority, government agency, court of law or other third party where we believe disclosure is necessary
 - as a matter of applicable law or regulation,
 - to exercise, establish or defend our legal rights, or
 - to protect your vital interests or those of any other person.
- With a potential or actual buyer (and its agents and advisers) in connection with any proposed or actual purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information solely for the purposes disclosed in this Privacy Policy.
- With any other person, such as Third Parties, with your consent for such disclosure.

NOTE:

Except as otherwise stated in this Privacy Policy, we generally do not sell, trade, rent or share Personal Data that we collect with Third Parties unless we have your consent to do so.

VII. THIRD PERSON INFORMATION

During the provision of our Services, the Customer can provide us with Personal Data regarding other natural persons (Third Person).

The Customer providing us with Third Person data, is contractually obligated to inform the Third Person that their data shall be shared and processed by Service Provider, and will provide them with this Privacy Policy wherein they can find all the information about their Personal Data that is being Processed by Service Provider, as well as their data privacy rights.

Pursuant to applicable regulations, we provide Third Person with the following information:

- Identity and contact details of the data controller, representative and data protection officer
- Purpose and legal basis for processing Personal Data:
- Recipients or categories of recipients of Personal Data
- Period for which the Personal Data will be stored or criteria used to determine that period
- When processing is based on the legitimate interests pursued by the controller or this party
- Right to request controller access to, rectification and erasure of Personal Data and/or restriction of processing, right of data portability, right to lodge a complaint with a supervisory authority
- Source of Personal Data – the source of Personal Data of Third Person is always the Customer.

VIII. HOW WE PROTECT YOUR PERSONAL DATA?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centres, and information access authorization

controls. While we are dedicated to securing our systems and Services, you are responsible for verifying that the Personal Data we maintain about you is accurate and current.

We do not store, transmit, or process any customer credit card information provided to us at any time during, or after the transaction. Any payment information provided is transmitted to a Third Parties via a secured socket layer.

IX. WHAT ARE YOUR DATA PROTECTION RIGHTS?

You have the following data protection rights:

- To access, correct, update or request deletion of your personal information.
- To object to the processing of your personal information (which is processed on the grounds of legitimate interests), ask us to restrict processing of your personal information or request portability of your personal information.
- To opt out of marketing communications we send you, at any time. You can exercise this right by clicking on the "unsubscribe/opt out" link in the marketing communications we send you.
- If we are processing your personal information with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted pursuant to lawful processing grounds other than consent.
- You have the right to file a complaint with a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

X. AUTOMATED DATA PROCESSING

We use automated data processing (automated decision making) to automatically provide our Customers with certain opportunities, bonuses and amenities based on their use of the Services. Should certain conditions be met, Service Provider shall automatically send an e-mail to certain Customers giving them an opportunity to access certain bonuses and amenities.

Customers are not under any obligation to accept these offers.

XI. TRANSFERS OF YOUR PERSONAL DATA TO OTHER COUNTRIES

A network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers supports our operations. We and our third-party service providers store and process your Personal Data in the European Union. We will protect your information as described in this Privacy Policy if your Personal Data is transferred to other countries. By using our Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country.

XII. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, in accordance with the significance of the changes we make. The revised Privacy Policy will be effective as of the published effective date.

Effective date: September 1, 2019