

## Privacy Policy

The Company and our teams are committed to protecting your privacy and personal information. On that account, this Privacy Policy is established to explain how we collect, store, manage, and use the information you provide us when using our Site and Services.

The Privacy Policy herein describes the categories of Personal Data we collect from Users, including the methods used to collect, use, keep, secure, process, and disclose with third parties.

In this Policy, “Personal Data” refers to any information that can be used to identify or contact the User, where a “User” is the identified individual either personally or in combination with other stored data.

In the context of this Policy, “treatment” and “processing” of Personal Data refers to any action taken on Personal Data, including its collection, recording, structuring, storage, modification, access, use, disclosure by transmission, dissemination, or other accessibility, combination or reconciliation, restriction, erasure, or disposal.

We adhere to retaining transparency when collecting and managing your Personal Data. It is important to us that you are provided with all the necessary information for you to make informed choices regarding the processing of your Personal Data. To create a secure environment for our Users, we employ various methods and approaches to give you accurate information about processing your Personal Data correctly.

We use your Personal Data for the following:

- Offer you our Services
- Enhance User experience on our Site
- Update our Services and Site
- Secure our rights and interests
- Perform business and administrative activities necessary to support the provision of our Services to our Users
- Comply with any legal or regulatory requirements

We implement extensive resources to give you access and control over your Personal Data. In that regard, you may contact us whenever you need to review your Personal Data, request its modification or deletion, request us to stop using it for a particular purpose, or ask us to transfer you to a third party.

While we cannot guarantee that your Personal Data will always remain uncompromised, we guarantee that we use and will continue utilizing different measures to ensure security.

Our Services are offered to a broad audience and are not intended for users under 18 years old. We do not willfully allow anybody under 18 years old to access our facilities, nor do we knowingly collect or seek information from them. If we become aware that a minor's data has been gathered, we shall make every effort to have it removed as quickly as we reasonably can.

When do we collect your Personal Data?

Whenever you use one of our facilities, contact us through one of our service channels, or use the Site, we receive information about you. In some cases, you may actively provide us with Personal Data, but in other instances, we may collect your Personal Data by reviewing and monitoring your use of our Services or service channels.

You are under no obligation to provide any Personal Data about yourself. However, in some circumstances, failing to supply us with such Personal Data may prevent us from delivering the facilities to you, prevent you from using the Site, or result in the failure of our Facilities and the Site.

What Personal Data do we gather from you?

We collect the following information whenever you browse our Site:

- IP address
- Time of entry
- Date of entry
- Web and mobile site pages visited
- Preferred language
- Software crash records
- Type of browser used
- Used device's information

However, some of the mentioned information may not be personally identifiable to you and therefore does not qualify as Personal Data.

We collect any Personal Data you provide us by contacting us or when you submit personal documents for identification purposes. Moreover, you acknowledge that your provided name and email address are Personal Data that we disclose to the relevant third parties.

What is the purpose of processing Personal Data?

You acknowledge that we may process your Personal Data when you authorize us to process your Personal Data for one or more specific purposes. This process refers to cases where you have

expressly provided us with your details through the Site so we can disclose them to third parties. This treatment is required for the legitimate interests pursued by the Company or the relevant third party, including to improve our facilities or to assert or defend legal rights. Such treatment may be required to comply with a legal obligation.

You acknowledge the following instances where we may handle your Personal Data, including the legal basis for such handling:

- If you specifically request it, we may collect Personal Data and give it to third parties who will receive your contact information. Your Personal Data may be processed for one or more particular purposes with your consent.
- For us to respond to your inquiries, requests, or claims regarding your use of the Services, handling your Personal Data is required. Such a process is necessary to further the Company's or a third party's legal interest.
- We process your Personal Data to comply with the relevant legal obligations.
- We may use your Personal Data to improve our Services. Such a process includes, among other things, reviewing any error logs and other Service-related malfunction reports.
- Your Personal Data can be used to protect the relevant parties from fraud and authorized use of our Services.
- Personal Data can be used to perform and maintain several operations that support the provision of our Services. These operations include back-office duties, commercial development activities, strategic decision-making, and monitoring methods.
- We may process your Personal Data in compliance with the applicable laws, regulations, and agreements to secure our interests, rights, and assets, including those of the relevant third parties, such as the filing, exercising, or defending legal claims.

#### Disclosure of Personal Data to Third Parties

You accept that we may disclose your Personal Data to third parties such as our service affiliates, affiliated entities, and business associates. Our service affiliates include host and backup storage providers, IP address records, user analysis, and statistical and technical services. Additionally, you may request that we provide certain information to third-party Bitcoin trading hubs via email. In this case, we will supply these third parties with the Personal Data you provide us for this sole purpose, and their use of your Personal Data is subject to their relevant privacy policies.

You further accept that we may disclose your Personal Data to federal, state, local, and other regulatory bodies, including when such disclosure is required to protect our interests, rights, and assets.

Moreover, we may disclose your Personal Data to prospective investors, buyers, and financiers of the Company or any companies in the group of businesses to which our Company belongs.

You agree that the Company is not authorized to disclose the following:

- We are not permitted to name our investors.
- We are not authorized to disclose any Company information to any third parties related to a merger, restructuring, consolidation, or the Company's bankruptcy, including those of our affiliates.
- We are not permitted to disclose Company transactions, such as the sale of assets of the Company, its committee, or its affiliates.

### Cookies and Third-Party Services

We may use third-party services, such as analytic companies or businesses that show advertisements on our Site. These third-party services may use Cookies and other information technologies, where these third-party suppliers are subject to a separate privacy policy.

A "Cookie" is a small text file that can be stored on the device you use to visit or access our Site. We use Cookies that allow us to gather data regarding your use of the Site to improve your User-experience, including storing your preferences and settings, personalizing and distributing products, and other services that are significant to your use of our Site.

Some of the Cookies we may use are called session Cookies that are temporarily downloaded to your device and only last until you close your web browser. Other Cookies may be called persistent Cookies, which remain on your device after you stop browsing the Site. These persistent Cookies can help the Site recognize you as a returning visitor when you browse the Site again.

### Types of Used Cookies

We use the following Cookies on our Site, which may be stored in your browser depending on your preferred settings:

- "Strictly Necessary Cookies" are required for Users to browse the Site and use its features. These Cookies provide you with the contents, products, and Services you request. These Cookies are crucial for your device to download or deliver information, such as navigating the Site and using its exclusive features, including returning to previously visited pages. These Cookies identify Users as connected to the Site and gather your Personal Data, such as your username and the date of your most recent log-in.
- "Session Cookies" are temporary Cookies that are deleted when you close your browser.

- “Functionality Cookies” are used to recognize Users when they return to the Site, helping us to remember your choices and preferences. Functionality Cookies continue to exist when your browser closes and are valid until their appropriate time of expiration.
- “Performance Cookies” are used to test and tweak the Site’s performance and provide its aggregate numbers to enhance the User’s experience. These Cookies also allow us to conduct analytical functions on the Site and collect aggregated data that cannot be used to identify or contact the User. Furthermore, the duration of these Cookies varies; some expire as soon as your browser is closed, while others have an indefinite validity period.

### Blocking and Removing Cookies

You can modify the settings on your browser to block and remove some or all Cookies. For instructions on how to do this for some of the most used web browsers, click the links below:

- [Google Chrome](#)
- [Firefox](#)
- [Safari](#)
- [Internet Explorer](#)

However, you acknowledge that removing Cookies from your browser may result in some or all of the Site’s features and functionality not working as intended.

### Retention of Personal Data

Unless a longer retention time is required by the applicable laws, regulations, policies, or court orders, the Company will only keep your personal information for as long as necessary to process Personal Data as outlined in this Policy and under the Terms of Use.

We frequently evaluate the Personal Data we retain to see whether any of it can be removed to ensure that it is not kept longer than necessary.

### Transfer of Personal Data to Third Country or International Organization

You consent that we may transmit your Personal Data to international organizations or third countries, i.e., jurisdictions other than the one where you currently reside. In these situations, the

Company will take the necessary precautions to secure your Personal Data and guarantee that data subjects have access to enforceable rights and efficient legal remedies.

If you are a European resident or a part of the European Economic Area (or “EEA”), you acknowledge that these measures will apply when the following conditions are met:

#### Securing Personal Data

We implement adequate technical and operational measures to provide an appropriate level of protection for our stored Personal Data. These measures are for unforeseeable situations, such as the risk of processing, particularly accidental or unlawful destruction, loss, corruption, unauthorized release or access to the submitted, collected, or handled Personal Data.

Due to legal or other obligations beyond our control, we may be obliged to disclose your Personal Data to third parties, including public officials. In these situations, our capacity to regulate the level of protection provided to your Personal Data by such third parties may be limited.

Any online transfer of Personal Data cannot be guaranteed to be completely safe. In line with that, the Company cannot ensure the security of your Personal Data when you submit it via the internet.

#### Link to Third-Party Sites

The Site may contain third-party links, sites, or software programs. You acknowledge that we do not have any control over such third-party links and services or how they collect and use your Personal Data. Therefore, we are not responsible for such third parties or their privacy and data security practices. This Policy does not cover any activities through such third-party websites or apps.

We advise you to carefully study the privacy policies of any third-party websites or applications you access before using them or disclosing any personal information.

#### Right to Access

You have the right to ask the Company to confirm whether it processes any of your Personal Data. If it does, you may request to view that information as well as the following:

- The purpose of processing your Personal Data
- The categories of Personal Data
- The recipients or groups of recipients to whom the Personal Data has been or will be shared, including recipients in third-party nations outside of the EEA or recipients from international organizations
- If applicable, the Personal Data’s duration of retention, and if not applicable, the use of Personal Data, the criteria used to establish such duration

- The right to file a complaint with a regulatory body
- Any pertinent details about the source of the Personal Data if it was not obtained from you
- How the profiling is used
- The relevant measures related to transmitting data if the Personal Data is being transferred to a third country outside the EEA or to an international organization

The Company will provide you a copy of the Personal Data that it collects, where you may be charged a fee for any additional copies you request. If you submit your request online, the material will be delivered in a commonly used electronic form unless otherwise specified. Such a request to obtain a copy of the Personal Data must not violate any rights and privileges. Therefore, the Company has the right to reject your request if it breaches others' rights or privileges.

#### Right to Correct

You have the right to request that any of your inaccurate Personal Data be corrected by the Company. In line with the treatment's objectives, you may complete your Personal Data by submitting the required information to the Company.

#### Right to Cancel

You have the right to remove your Personal Data from the Company's records if any of the following occurs:

- Your Personal Data is not required anymore for its intended purpose of collection or use
- You revoke your consent on which the treatment is based, and there are no other lawful grounds for the treatment
- You object to the processing of your Personal Data if it is based on our or a third party's legitimate interests and there are no other lawful grounds for the processing
- You object to the use of your Personal Data for direct marketing purposes
- Your Personal Data was processed unlawfully; and
- Your Personal Data must be removed to comply 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 Treatment

If any of the following situations apply, you have the right to request for the Company to restrict the processing of your Personal Data:

- When you dispute the accuracy of the Personal Data, for a period allowing the Company to check the accuracy of your information
- When the processing of your Personal Data is unlawful, but you do not intend to have it deleted, and request for its use to be restricted instead
- When the Company no longer needs your Personal Data for its treatment purposes, but you still need it stored to establish, pursue, or defend legal claims
- If the processing of your Personal Data is required to the Company or a relevant third party's lawful interests, unless we demonstrate compelling lawful grounds for the processing that outweighs your interests, rights, and privileges or if we need to establish, exercise, or defend legal claims
- When your Personal Data is processed for direct marketing, including profiling

Suppose the handling of your Personal Data has been restricted after your request. In that case, such Personal Data will, except for being stored, only be handled with your consent and for the establishment, exercise, or defense of legal claims, or for the protection of any other natural person or legal entity's rights, or based on a significant public interest of the EU or of a Member State.

## Rights to Data Transfer

You have the right to receive the Personal Data you submitted to the Company in a structured and machine-readable format and transfer it to another processor if:

- You consented to the treatment or if it is based on a contract where you are a party
- The treatment is carried out by automated means

If it is technically feasible, you have the right to request your Personal Data be transferred directly from the Company to another controller to exercise your data transfer right. You acknowledge that your right to data transfer should not violate another person's right or privilege.

## Right to Object

You have the right to object at any time, based on your specific situation, to how your Personal Data is handled, whether based on the legitimate interests pursued by the Company or a third party, including profiling based on such lawful concerns. In that case, we will not process your Personal Data further unless there are legal reasons that outweigh your interests, rights, and privileges or for the establishment, enforcement, or defense of legal claims. Furthermore, you have the right to



expressly object whenever your Personal Data is used for direct marketing, including where profiling is related to such direct marketing.

#### Amendments to this Policy

We have the right to amend the terms of this Policy from time to time, effective immediately. We may but are not obligated to notify you regarding the changes to this Policy, whether such changes are significant or relevant to you.