

Privacy Policy

Effective from 01/01/2022

ABOUT US

COINWERFER S.R.O. is a crypto exchange company registered at , Bílkova 855/19, Staré Město, 110 00 Praha 1, Czechia and is considered to be Your Information Controller for the purposes of this Privacy Policy.

This policy describes how COINWERFER S.R.O. collects and processes the personal data of its customers and shares it with third parties. Please read this document carefully as this policy is legally binding when you visit our Sites or use our Services. We value our relationship with you and place the highest importance on respecting and protecting your privacy, your personal information will be processed in accordance with applicable law and this Privacy Policy.

1. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

1.1. We use a secure server and other secure implements to store the information we gathered about you. To keep your information as secure as possible, we have adopted internal rules on information security that include both instructions and measures to protect your personal data against being destroyed, lost or modified, as well as against unauthorized publication, and against unauthorized parties gaining access to or knowledge of the information.

1.2. As you will know, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data during transmission, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

1.3. We restrict access of your personal information to those COINWERFER S.R.O. employees who have a business reason for knowing such information. We provide continuous training to our employees about the importance of confidentiality and privacy of customer information. We maintain physical, electronic and procedural safeguards that comply with the relevant laws and regulations to protect your personal information from unauthorized access.

2. INFORMATION WE MAY COLLECT FROM YOU

We may collect the following information about you when you visit our Sites or use our Services:

2.1 Information you provide to us:

2.1.1. You may give us your personal data (e. g. your name, surname, date of birth, phone number and e-mail address) when you sign up to use our Services (e. g. when you create UserID, etc.). This also includes information you provide through your continued use of our Services, participate in discussion boards or other social media functions on our Website or App, enter a competition, promotion or survey, and when you report a problem with our Services. This additionally may include date of birth, address, nationality, financial information (including credit card, debit card, or bank account information), payment reason, geographical location, occupation and your picture.

2.1.2. We may also need additional commercial and / or identification information from you which is needed to comply with our anti-money laundering obligations under obligations by applicable law.

2.1.3. In providing the personal data of any individual (other than yourself) to us during your use of our Services, you promise that you have obtained consent from such individual to disclose his / her personal data to us, as well his / her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.

2.2. Information we collect about you:

When you use our Services or access our Sites, for example, to send or receive money, to make purchases from merchants, we collect information about the transaction, as well as other information associated with the transaction such as amount sent or requested, amount paid for products or services, merchant information, including information about any funding instruments used to complete the transaction Technical Usage and Device Information, and Geolocation Information.

2.2.1. Technical Usage and Device Information – information we collect from your phone, computer or other device that you use to access our websites or Services. This information tells us how you use the websites and Services, for example, what you have searched for and viewed on the websites and the way you use our Services, including your IP address, your login information, statistics regarding how pages are loaded or viewed, browser type and version, the websites you visited before coming to the websites and other usage and browsing information collected through Cookies.

2.2.2. Geolocation Information – information that identifies your location obtained through GPS, Wi-Fi, or cell site triangulation. Some of our products may ask you for permission to share your current location. If you do not agree to our collection of the geolocation information, our websites or Services may not function properly when you try to use them.

2.3. Information about you from third parties we are working with:

2.3.1. banks which you use to transfer money to us may provide your basic personal information, e. g. name, address and your financial information such as your bank account details, etc.;

2.3.2. business partners may provide us your name, address and financial information, such as card payment information, etc.;

2.3.3. credit bureaus, state registers etc. may provide us your data on financial liabilities and debts, etc.;

2.3.4. analytics providers, advertising networks and search information providers may provide us with information about you, such as confirming how you found our website;

2.3.5. social media networks (e. g. Facebook or Google, etc.) may provide relevant information that is necessary to authenticate you and enable our services when you use these services to log in to our Services. We may receive access to certain information that you have provided to them, including your name, profile image and e-mail address. We use such information, together with any other information you directly provide to us when registering or using our Services, to create your account and to communicate with you about the information, products and services that you request from us. You may also be able to specifically request that we have access to the contacts in your social media account so that you can send a referral link to your family and friends.

Please note that when you visit a COINWERFER social media page, you are subject to all applicable terms of use and policies for that social media platform, including its privacy policy. You are also subject to COINWERFER policies, as well as its privacy policies and the privacy policies of its partners as stated in COINWERFER Terms of Service policy. To additionally protect your privacy, do not include your, or anyone else's, personally identifiable information, including but not limited to personal codes, account

numbers, card numbers or images of cards, phone numbers or e-mail addresses in any comment or post. If you do include personally identifiable information, your comment or post may be deleted.

3. USES MADE OF THE PERSONAL DATA

3.1. We use your personal data information in the following ways for:

3.1.1. For purpose of providing services to you – we collect and process your personal data in order to provide our services to you: to carry out our obligations relating to your contract with us and to provide you with the information (e. g. notify you about changes to our Services, updates of our Services, etc.), products and services (e. g. to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, etc.). For this purpose, we process your personal data received from you (e. g., your data collected as a result of communicating with you, etc.), data obtained from your visits in our website and other websites and / or received from other persons (e. g., banks, private companies, etc.). For this purpose, we may provide or transfer your data to our partners who contribute to our Services for you, state and government institutions, etc. For this purpose, we may keep your personal data up to 2 (two) years after the termination of the business relationship with you.

3.1.2. For purpose of security – we process your personal data in order to keep our Services safe and secure (e. g. verify your identity to protect against fraud, comply any applicable legal and regulatory requirements and to confirm your eligibility to use our products and services). For this purpose, we process your personal data received from yourself and as a result of the use of our Services by you (e.g., your data collected as a result of communicating with you, etc.). For this purpose, we may keep your personal data up to 8 (eight) years.

3.1.3. For purpose of administration of debts and any disputes from the agreements – we process your personal data in order to ensure your payment for us and for the settlement of disputes from the agreements between you and us. For this purpose, we process your name, surname, telephone number, e-mail address, e-mails, letters, transfer data, residence address and your identities data of your person. For this purpose, we receive your personal data directly from yourself, from publicly available sources (e. g., Population Register, data provided by third parties, etc.) and from third parties. For this purpose, we keep your data until the end of the debt administration (debt liquidation) considering the limitation periods set by the legal acts. For this purpose, we may keep your personal data up to 10 (ten) years after the termination of the business relationship with you.

3.1.4. For purpose of administration of the work of the COINWERFER employees – we are obliged by law to collect and process some personal data of our employees.

3.1.5. For purpose of selection and data base of candidates to vacancies in the COINWERFER – we process personal data in order to find candidates to work with us. For this purpose, we process your personal data received from you (e. g., your CV, etc.) and received from other persons (e. g., recommendations of current or former employers, social networks, media, etc.). We process your personal data so that we can offer you the job and career opportunities in the future, find and select candidates to work with us, and evaluate candidates' suitability for the proposed job. For this purpose, we may keep your personal data up to 6 (six) months.

3.1.6. For purpose of direct marketing – any in this Privacy Policy mentioned information that could be used for direct marketing purposes will be used only upon your given consent. You have a right to give, not to give or refuse this given permission of use of your personal data for marketing purposes at any time.

3.1.7. For purpose of improvement of websites that we control – we process your personal data, including any personal data that we receive from the use of our websites by you, to improve and develop our websites and to offer you better and more personalized services. For this purpose, we may keep your personal data up to 3 (three) months after you used our website.

3.1.8. For business communication purpose – we store your personal data for business communication (e. g. emails, chats, letters) and / or record any telephone conversation between us and you regarding to provisions of our Services with the purpose of safeguarding your and ours interests and / or conducting a quality check of the services provided by us and / or for the provision of a commercial transaction or other business communication evidence. For this purpose, we may keep your personal data up to 3 (three) years after you communicated with us.

4. PERSONAL DATA USAGE FOR DIRECT MARKETING

4.1. We may use your personal data for direct marketing purposes in order to provide you the offers and information about our Services (e. g. new products, etc.). For this purpose, if you have accepted COINWERFER Terms of Service and specified your e-mail and telephone number we process the following personal data and use your e-mail, name, surname and telephone number making it possible to disagree to such use of the personal data. If you do not have an Agreement with COINWERFER we process your personal data upon receipt of your additional consent.

4.2. We may use your information for direct marketing in the following ways:

4.2.1. to measure or understand the effectiveness of advertising we serve and to deliver relevant advertising to you;

4.2.2. to provide you with information about other similar goods and services we offer that are like those that you have already purchased or enquired about if you gave us the permission for direct marketing purposes which you can refuse at any time;

4.2.3. to provide you, or permit selected third parties to provide you, with information about goods or services we believe may of interest to you;

4.2.4. to combine third party information, we receive with the information you give to us and information we collect about you. We may use this combined information for the purposes set out above (depending on the types of information we receive);

4.2.5. to process applications for products and services available through us including making decisions about whether to agree to approve any applications;

4.2.6. we may use your personal data also to analyze and improve the effectiveness of our websites, advertising and market research, etc. In this case, we will use your depersonalized data.

4.3. Your personal data kept only for direct marketing purposes shall be processed for a maximum of 6 (six) months from the date of termination of the relationship with us, except in cases where you express disagreement regarding the processing of your personal data for above mentioned purposes. If you withdraw your consent, we will endeavour to terminate the processing of your personal data for direct marketing purposes from the date of receipt of your disagreement in the acceptable manner of writing.

4.4. Even if you have given your consent to the processing of your personal data for direct marketing purposes, you may easily withdraw this consent any time for all or some of the personal data processing activities. In addition, you may express your consent or disagreement on the processing of your personal data for direct marketing purposes at any time by submitting a respective notice to us in writing:

sending e-mail to info@coinwerfer.cz or by post to COINWERFER S.R.O. Bílkova 855/19, Staré Město, 110 00 Praha 1, Czechia

5. DISCLOSURE OF YOUR INFORMATION

5.1. We may share your personal data with the following data processors in order to perform the COINWERFER Services:

5.1.2. Fraud prevention agencies – in order to verify your identity, protect against fraud, comply with anti-money laundering laws and to confirm your eligibility to use our products and services.

5.1.3. Cloud storage providers – in order to safely and securely store your data with COINWERFER.

5.1.4. Banking and financial services partners – financial services providers that help us provide the COINWERFER Services including banking partners, banking intermediaries and international payments services providers.

5.1.5. Affiliates, business partners, suppliers and sub-contractors – for the performance and execution of any contract we enter with them or you.

5.1.6. Advertisers and advertising networks solely to select and serve relevant adverts to you and others;

5.1.7. Analytics and search engine providers that assist us in the improvement and optimization of our site;

5.1.8. Other persons and / or companies assisting us to carry out our business as well as direct marketing.

5.2. We may disclose your personal information to third parties:

5.2.1. if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

5.2.2. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Customer Agreement and other applicable agreements; or to protect the rights, property, or safety of COINWERFER, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;

5.2.3. to assist us in conducting or co-operating in investigation and prevention of fraud or other illegal activity where we believe it is reasonable and appropriate to do so;

5.2.4. in response to a subpoena, warrant, court order, or as otherwise required by law;

5.2.5. to protect our rights for breach of contract and etc.;

5.2.6. to assess financial and insurance risks;

5.2.7. to help develop customer relationships, services and systems.

5.3. We do not publish a list of all the third parties with whom we share your data with, as this would be heavily dependent on your specific use of our Services. However, if you would like further information about who we have shared your data with, you can request this by writing to info@coinwerfer.cz.

5.4. The ability of the above mentioned service providers to use your data is limited, e.g. they cannot use these data for any purposes other than providing services to us. We guarantee to you that your

personal data will not be sold, provided or otherwise illegally transferred to third parties, and used for purposes other than those they were collected for.

6. WHERE WE STORE AND HOW WE SHARE YOUR PERSONAL DATA

6.1. The data that we collect from you may be transferred to and stored at secure and GDBR compliant servers. It may also be processed by staff operating in this destination, who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your payment order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

6.2. Remind you that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

6.3. In order to provide our Services to you, it is sometimes necessary for us to transfer your data to the third parties outlined in article 5. In these cases, we ensure that both ourselves and our partners take adequate and appropriate technical, physical and organizational security measures to protect your data. We also ensure we have appropriate contractual protections in place with these third parties.

7. DATA RETENTION

7.1. As a regulated financial institution, COINWERFER is required by law to store some of your personal and transactional data beyond the closure of your account with us. Your data is only accessed internally on a need to know basis, and it will only be accessed or processed if necessary.

7.2. We will delete data that is no longer required for the purposes stated in this Privacy Policy or / and relevant law or jurisdiction in which we operate.

7.3. In order to fulfil the requirements relating to the protection of personal data and legal certainty, that retention period is fixed at 8 (eight) years after the end of a business relationship or of an occasional transaction. However, if necessary, for the purposes of prevention, detection or investigation of money laundering and terrorist financing, and after carrying out an assessment of the necessity and proportionality, COINWERFER may perform the further retention of records for a period not exceeding an additional 2 (two) years.

Please note: Retention periods could be subject to change, depending on your location, regulatory requirements, or other legal obligations that we need to adhere to.

8. YOUR RIGHTS

8.1. You have the rights provided by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (GDPR) including the following:

8.1.1. You have the right to ask for modifications to your personal data in case you believe that this personal data is not up to date or accurate.

8.1.2. You have the right to access your personal data that we process.

8.1.3. You have right to demand the destruction of personal data when they are no longer needed for the purposes for which they were collected, if they are processed illegally or when you cancel your consent to the processing of personal data or do not provide such consent, except the obligations required to us by law.

8.1.4. You have the right to ask COINWERFER for information about what your personal data is being processed (the right to be informed about) and the rationale for such processing.

8.1.5. You have the right to withdraw previously given consent for processing of your personal data for a purpose or disagree with the processing of personal data.

8.1.6. You have right to demand, if technically feasible, the provision of your personal data collected with your consent or for the purpose of performing the contract in an easily readable format, or to request their transfer to another data controller.

8.1.7. You have the right to ask us not to contact you for marketing purposes by contacting us at info@coinwerfer.cz, or by adjusting your notification preferences in the "Settings" section of your account page.

8.2. You could make your requirements related to the implementation of your rights in person, by post or by e-mail specified in this Privacy Policy. Upon receipt of your request, we may ask you to provide a proof of identity and additional information necessary for the request.

8.3. We have the right not to comply with your requirements when it is necessary to ensure the following:

8.3.1. the state security and defence, important economic or financial interests of the state;

8.3.2. public order, prevention, investigation, detection or prosecution of criminal offenses;

8.3.3. the fulfillment of legal obligations imposed on us;

8.3.4. the prevention, investigation and detection of breaches of official or professional ethics;

8.3.5. the protection of rights or freedoms of yours or other individuals.

8.4. Upon receipt of your request, we will respond to you within 30 calendar days following the receipt of your application and the date of submission of all documents necessary for the response. If we consider it necessary, we will stop processing your data, except storage, until your application is resolved. If you legally withdraw your previously given consent, we will immediately but not later than within 30 calendar days terminate the processing of your personal data, except in cases specified in clause 8.3. above and in cases provided for by law.

8.5. If you disagree with our actions or the response to your application, you have right to complain about our actions to a competent state authority – State Data Protection Inspectorate.

8.6. Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility for them. Please check these policies before you submit any personal data to these websites.

9. COOKIES POLICY

9.1. The cookies are a small amount of data, which often includes an anonymous unique identifier that is sent to your browser from a website's computer and then stored on your hard drive. We use cookies for

analyse the use of our websites, for develop services to better meet your needs and for administrative purposes, such as tracking usage and login authentication. If you reject all cookies, you may not be able to use COINWERFER services that require you to “sign in” and you may not be able to take full advantage of all offerings.

Please see more detailed information about cookies by visiting <https://www.allaboutcookies.org/>.

10. CHANGES TO OUR PRIVACY POLICY

10.1. Any changes we may make to our privacy policy will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

11. CONTACT US

11.1. If you have questions about our privacy practices that are not addressed in this Privacy Policy, please email us at info@coinwerfer.cz .