

## PRIVACY POLICY

IF YOU DO NOT ACCEPT THIS POLICY (AND (OR) CHANGES, ADDITIONS AND (OR) AMENDMENTS THERETO) AND (OR) COOKIES NOTICE (PLEASE REFER TO TERMS AND CONDITIONS OF TRADINGENE WEBSITE USE) - **DO NOT USE THIS WEBSITE.**

### 1. INTRODUCTION

- 1.1. This privacy policy (hereinafter, the "**POLICY**") applies to this website (tradingene.com) or connected mobile applications (for instance, relevant iPhone, android and iPad apps) or related services (hereinafter, the "**WEBSITE**").
- 1.2. This POLICY determines the manner in which we (companies and persons operating under TRADINGENE brand) (hereinafter, "**we**") process information collected from users of the WEBSITE (each, a "**USER**" or "**you**").
- 1.3. Processing of information means any operation or set of operations performed on information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.4. This POLICY is integral part of Terms and Conditions of Tradingene Website Use.

### 2. LEGAL OVERVIEW

- 2.1. Using this WEBSITE the USER confirms acceptance of this POLICY.
- 2.2. If you continue to use the WEBSITE after this POLICY is changed or amended, we will deemed you as having accepted respective changes.
- 2.3. If you do not accept this POLICY (and (or) changes, additions and (or) amendments thereto) and (or) cookies notice, **do not use this WEBSITE.**
- 2.4. Personal data is any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 2.5. We will collect personal data from USERS only if they voluntarily submit such information to it.
- 2.6. USER is entitled to withdraw his or her consent in any time, however, in certain cases it may prevent them from participating or engaging in certain WEBSITE related activities. Such withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Should you withdraw your consent on processing of your personal data, please contact us as described below.
- 2.7. Please do not submit your personal data to us if you do not wish us to collect it.
- 2.8. **USERS may visit the WEBSITE anonymously.**
- 2.9. By accepting this POLICY, you agree to being contacted by us or by our associates or third parties (without that being considered to any breach of law or your privacy) with marketing communications regarding various offerings by way of e-mail or SMS or push-notifications (other forms of written communication), any of which you may unsubscribe from at any time by contacting us, as described below.
- 2.10. Before permitting you to use the WEBSITE and requesting for Tokens, we may require you to provide additional information (such as a date of birth, passport number, numbers that you may use or have registered with your local tax authority, or other data which can be used for personal identification purposes and that may be required to comply with applicable laws) so that we can verify your identity or address. We may also obtain information about you from third parties such as identity verification services.
- 2.11. We shall not be required and may be unable to accept you as a client or investor until all Know-Your-Client and Anti-Money-Laundry documentation we require is duly executed and received, if required under applicable laws, and we reserve the right to reject your payments of any nature (donations, investments, payments, etc.) until it has received all necessary documentation, properly completed and duly executed.
- 2.12. The WEBSITE contains links to other sites. We are not responsible for the privacy policies and/or practices on other websites. You should exercise caution and read the

- respective privacy policy stated on that site when linking to another site. This POLICY only governs information collected on the WEBSITE. We cannot be responsible for the protection and privacy of any information, which you provide whilst visiting such sites.
- 2.13. This POLICY covers use of cookies by us and does not cover the use of cookies by any other third parties.
  - 2.14. This POLICY constitutes an integral part of Terms and Conditions of Tradingene Website Use (which may be amended from time to time) published at WEBSITE.
  - 2.15. HEREBY you irrevocably declare:
    - 2.15.1. that you have read, understood, found satisfactory and fully accepted this POLICY;
    - 2.15.2. that you confirm that your consent for processing of personal data is given freely and clearly;
    - 2.15.3. that you consider Terms and Conditions of Tradingene Website Use (including clauses related to WEBSITE) and risk warnings and risk disclosures provided in the WEBSITE in any form as an integral part of this privacy policy.

### **3. PRIVACY NOTICE**

- 3.1. As a general rule, we may collect only what it needs and will not share your personal data with any third parties, unless otherwise indicated in this POLICY.
- 3.2. We use the information, provided to it by the USERS.
- 3.3. We can collect the following data and information (when you visit the WEBSITE, or use its products) sent to us by your computer, mobile phone, or other access device:
  - 3.3.1. information you have provided to us, including the WEBSITE (including but not limited to personal data, such as your name, address, telephone number, email address details, date of birth, passport number, numbers that you may use or have registered with your local tax authority, or other data which can be used for personal identification purposes);
  - 3.3.2. information provided by other companies who have obtained your permission to share information about you (including personal data);
  - 3.3.3. information about your interaction with adverts and services such as registration, comments (non-personal identification information);
  - 3.3.4. information we collect (or may collect) using cookies stored on your device about your WEBSITE use and/or selected third party websites<sup>1</sup> use (non-personal identification information);
  - 3.3.5. your IP address (a number identifying a specific network device on the Internet required for your device to communicate with WEBSITE);
  - 3.3.6. e-mails or other messages send by USERS within WEBSITE or Tradingene platform;
  - 3.3.7. when you use a location-enabled device with the WEBSITE and products - information regarding location of the device when you access and use the WEBSITE. We may collect such geographical location data or use various means to determine the location, such as sensor data from your device that may, for instance, provide data on nearby cell towers and wi-fi access spots;
  - 3.3.8. non-personal identification information - device information including, but not limited to, identifier, name, and type, operating system, other technical information about USERS means of accessing the WEBSITE, mobile network information and standard web log information, such as browser type, and the pages accessed on the WEBSITE;
  - 3.3.9. other profile data including but not limited to: personal pages, gender, age and mobile number.
- 3.4. We may request you to provide information that we, in our sole discretion, considers as required under applicable laws, regulations and (or) policies (which include but not limited to passports, driver's licenses, utility bills, photographs of you, government identification cards), and you should provide such information if you intend to continue use of the WEBSITE and (or) receiving new services or possibilities within the WEBSITE (i.e. in case further use of the WEBSITE or designed use of the WEBSITE is not possible in absence of such information).
- 3.5. We may collect and use USERS information (including personal data) for the following purposes:
  - 3.5.1. to provide our services;
  - 3.5.2. to improve the TRADINGENE services;
  - 3.5.3. to elaborate commercial version of our WEBSITE and of TRADINGENE services;

<sup>1</sup> For more information, please see cookies notice below

- 3.5.4. to promote the TRADINGENE services (if needed further);
- 3.5.5. for contacting the USER;
- 3.5.6. for interaction with external social networks and platforms;
- 3.5.7. for registration and authentication;
- 3.5.8. for handling payments;
- 3.5.9. for infrastructure monitoring;
- 3.5.10. for managing contacts and sending messages;
- 3.5.11. for analytics;
- 3.5.12. to protect the WEBSITE and USERS;
- 3.5.13. for interaction with support and feedback platforms;
- 3.5.14. for USER database management;
- 3.5.15. for communications with other USERS;
- 3.5.16. for managing support and contact requests;
- 3.5.17. to run, maintain and operate the WEBSITE (including for provision of services);
- 3.5.18. to run promotion, contest, survey or other WEBSITE features;
- 3.5.19. to comply with applicable laws or by-laws;
- 3.5.20. to send USERS information they agreed (or have requested) to receive about topics we considers as interesting for them;
- 3.5.21. to send USERS a service-related announcement (these communications are not promotional in nature).
- 3.6. Information is collected and processed through running the WEBSITE.
- 3.7. The personal data may be freely provided by the USER, or, in case of usage data, collected automatically when using the WEBSITE. We may collect personal data in a variety of ways, including, but not limited to, when USERS visit the WEBSITE, fill in a form, and in connection with other activities, services, features or resources available on the WEBSITE.
- 3.8. We do not sell, trade, or rent USERS personal data to others.
- 3.9. We may share generic aggregated demographic information not linked to any personal data regarding visitors and USERS with business partners, trusted affiliates and advertisers.
- 3.10. We will not release your personally-identifiable information to any third party without your consent, except as set forth herein.
- 3.11. We may disclose USER's personal data when we believe that such disclosure is necessary:
  - 3.11.1. to conform to legal requirements or to respond to a subpoena, search warrant or other legal process received by us, whether or not a response is required by applicable law;
  - 3.11.2. for legal purposes by us in court or in the stages leading to possible legal action arising from improper use of the WEBSITE or the related services;
  - 3.11.3. to reveal personal data upon request of public authorities;
  - 3.11.4. to protect our rights; or
  - 3.11.5. to protect the safety of members of the public and USERS of the service and (or) the WEBSITE.
- 3.12. We reserve the right to share your personal data (in the scope limited to the necessary to disclose) with:
  - 3.12.1. our banking partners;
  - 3.12.2. other USERS - only for the purposes of normal TRADINGENE services use or function (including for making ratings, etc) related to the commercial use of TRADINGENE services;
  - 3.12.3. third parties, including its own subsidiaries and affiliated companies, which we may engage from time to time to preserve, analyse or otherwise store or manipulate data received<sup>2</sup>;
  - 3.12.4. entities we plan to merge with or be acquired by (the newly combined entity shall follow these terms with respect to your personal data, and you would as well receive prior notice of any change in applicable policy);
  - 3.12.5. third party identification services providers for fraud prevention purposes;
  - 3.12.6. law enforcement, government officials, or other third parties when:
    - 3.12.7. we are compelled to do so by a subpoena, court order, or similar legal procedure;
    - 3.12.8. we believe in good faith that the disclosure of personal data is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate

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<sup>2</sup> In all such cases, such third-party service providers will be required to treat all such data with the same degree of care as we and they will be prohibited from disclosing such data to any other person or party, except as otherwise provided for in this privacy policy.

- violations of Terms and Conditions of Tradingene Website Use; or
- 3.12.9. other third parties only with your prior consent or direction to do so.
- 3.13. We reserve the right to transfer personal data to a successor that has acquired such rights in result of sale or substantial sale of all of our assets to that successor.

#### **4. MAINTENANCE OF PERSONAL DATA**

- 4.1. We process personal data lawfully, fairly and in a transparent manner.
- 4.2. Access to USER's personal data shall be limited to:
  - 4.2.1. a subset of employees who work on compliance and identity verification matters (for the companies); and
  - 4.2.2. USERS that are natural persons (for natural persons).
- 4.3. We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of USER's personal data, username, password, transaction information and data stored on the WEBSITE.
- 4.4. The information provided to us is stored indefinitely one or more databases directly or indirectly maintained by us or engaged third party.
- 4.5. We store and process your personal data on its servers in the EU and elsewhere in the world, where its facilities or its service providers are located. We or such third parties may be located in countries where the laws on processing personal data may be less strict than in your country. We ensure that your personal data will be stored or processed only within countries that provides an adequate protection of the rights of subject of personal data.
- 4.6. While we cannot guarantee that loss, misuse or alteration to data will not occur, we make every effort to prevent such occurrences.
- 4.7. We confirm that personal data request is adequate, relevant and limited to what is necessary for the purposes for which personal data will be processed. Your personal data will be processed only if the purposes of the processing could not be reasonably be fulfilled by other means.
- 4.8. Any other particularly sensitive information (such as credit card numbers collected for commercial transactions) is encrypted prior to transmission to us by USER.
- 4.9. The data is kept for the time necessary to provide the services requested by the USER, or stated by the purposes outlined in this document, and the USER can always request us to suspend or remove the data.
- 4.10. We confirm that processing of personal data is carried out with appropriate technical and organizational measures, i.e. the data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. We use firewalls and data encryption, physical access controls to data centers and information access authorization control.
- 4.11. In some cases, the data (including personal data of the USERS) may be accessible to certain types of persons in charge, involved with the operation of the WEBSITE (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT-companies, communications agencies) appointed by us. The updated list of these parties may be requested from us at any time.
- 4.12. We may be sometimes required to compare the personal data provided by the USER to third party databases in order to verify its accuracy and confirm USER's identity to comply with relevant regulations. In such case we will not sell or rent your personal data to third parties: we will combine your information with information collected from other companies.
- 4.13. By submitting your personal data, you agree to this transfer (including cross-border transfer), storing, or processing.
- 4.14. USERS are entitled, at any time, to know whether their personal data has been stored and can consult with us to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, rectified, updated or erased; for restriction of processing of personal data concerning the USER or to object for such processing; for lodging a complaint with a supervisory authority on the personal data processing; or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their treatment for any

and all legitimate reasons. Requests should be sent to us in accordance with the contact information provided.

## **5. CHANGES IN THE PRIVACY POLICY**

- 5.1. From time to time we may make changes to this POLICY. If we make changes, we will post them on the WEBSITE (main page) to notify the USERS thereof.
- 5.2. A USER is bound by any minor changes to the POLICY when using the WEBSITE after those changes posted.
- 5.3. We encourage USERS to frequently check this page for any changes to stay informed about how we are dealing and protecting the personal data collected.
- 5.4. Further use of the Website (including by simply accessing and reviewing it) means that you accept and agree with any alterations made to this POLICY.
- 5.5. You acknowledge and agree that it is your responsibility to review the POLICY periodically and become aware of modifications.

## **6. YOUR RESPONSIBILITIES**

- 6.1. You are responsible for the security of the login information, such as usernames and passwords, which give you access to your private information maintained by us.
- 6.2. Make sure you keep login information in a safe place and do not share it with others.
- 6.3. Please note that key-loggers, viruses, or other surveillance devices can intercept login information on the computers from which you access the WEBSITE, so you should take precautions regarding such devices, especially from public computers.
- 6.4. You should always log out from any the WEBSITE when you are not actively using them.
- 6.5. USERS are responsible for any third party personal data obtained, published or shared through the WEBSITE and confirm that they have the third party's consent to provide the personal data to us. Hereby you indemnify us against any losses and (or) damages which may occur in case of your default in having respective consent.
- 6.6. Please be aware that whenever you voluntarily post public information to public forums (such as journals, weblogs, message boards, classifieds), such information can be accessed by the public and be used to send you unsolicited communications.

## **7. CONTACT DETAILS**

- 7.1. Any questions, comments or requests concerning this privacy policy can be directed to the address listed on "Contact us" page of the WEBSITE.
- 7.2. To report abuse, please contact support as listed on "Contact us" page of the WEBSITE.