

PRIVACY POLICY

v.1.1

updated: November 05, 2020

This Privacy Policy covers how [REDACTED] collects, uses, discloses and stores information about You when You use our Website or Platform.

The definitions set forth herein and mentioned with capital letter, unless specifically introduced in this Privacy Policy, shall have the meaning as described in Terms of Service/Use, which can be found on the Website or, if the definition cannot be found in Terms of Services, this document or other documents, published on the Website, it shall have the meaning as is specified in the General Data Protection Regulation.

IF YOU DO NOT AGREE WITH PROVISIONS OF THIS PRIVACY POLICY, YOU SHALL RESTRAIN FROM USING OF THE WEBSITE OR ANY OF OTHER SERVICES OFFERED ON THE WEBSITE. BY VISITING THE WEBSITE AND/OR BY REGISTERING OF THE USER ACCOUNT AND CHECKING THE BOX "I AGREE WITH PROVISIONS OF TERMS OF USE" YOU PROVIDE US A WITH AN INFORMED CONSENT TO PROCESS AND USE YOUR PERSONAL DATA AS SPECIFIED IN THIS PRIVACY POLICY.

1. GENERAL PROVISIONS

- 1.1. We take great care to limit the Personal Data We collect and use only for the purposes, which are necessary for providing our Services.
- 1.2. Company collects and processes Personal Data, that is necessary for legitimate business purposes, which will be disclosed to the data subject. Company will use and process this information only for the purposes for which it was collected, retaining the Personal Data only for so long as it is required for specific purpose of collecting the information, unless a longer period is necessary for our legal obligations or to defend a legal claim.
- 1.3. We do not transfer Your Personal Data to third parties, except circumstances mentioned in this Privacy Policy or Terms.
- 1.4. This Privacy Policy is subject to the Safe Analytics Terms of Use (which may be found on the Website). Your use of the Services and any Personal Data You provide on our Services remains subject to the terms of this Privacy Policy and our Terms of Use.
- 1.5. We reserve the right to update this Privacy Policy from time to time. If the changes are significant, We may inform You about such changes by posting a notice on our Website or by sending an email to Your registered email address (or by other means deemed appropriate) You can find the latest version of Privacy Policy on the Website anytime.

2. ABOUT US

The legal entity, which acts as a Personal Data Processing Company is [REDACTED], registry code [REDACTED], registered address [REDACTED].

3. WHAT DATA WE COLLECT ABOUT YOU

- 3.1. «Personal Data» (also referred as to the «PD», «Personal Information») shall mean any information, that identifies You, i.e. Your email, login (User name) requests to our support team, statistics and etc. If You cannot be identified (for example, when Personal Data has been anonymized), this Policy shall not apply.
- 3.2. Whenever You visit our Website or use our Services, We collect and process Your Personal Data.
- 3.3. We divide the information we collect about You as follows:

3.3.1. *Information You provide us with by Yourself:*

- a) When register on the Website and use our Services, You provide Us with Your Personal Data which includes following info:
 - i Email address;
 - ii First Name;
 - iii Date of Birth;
 - iv Citizenship.
- b) In certain cases, (when additional verification by bank or compliance authority is needed according to governmental rules, AML or KYC policies, or if such information is required for providing You with a customer support services) Company, or our duly authorized KYC-provider, may require You to provide additional information, and namely:
 - i Mobile phone number;
 - ii Numbers, that You may use or have registered with Your local tax authority;
 - iii Additional photographs of You;
 - iv Confirmation of proceeds sources (for example, additional bank statements);
 - v Sworn statements;
 - vi Proof of address (utility bill or bank reference letter or other confirming documents);
 - vii Bank details and other payment information;
 - viii Other information (including, but not limited to that information, mentioned in the Section 3 of our Terms of Use. Be advised, that if You are acting on behalf of the legal entity, the aforementioned list differs and may include additional documents and information).

It shall be noted, that due to the Applicable Law, We are obliged to conduct KYC procedures (which are described in the Section 2 of the Terms). We preserve the right to conduct KYC at any time if Your Platform's Usage, as it mentioned.

The abovementioned information and details shall be provided only upon special personal request to the User and specified in respective email or message from us our duly authorized KYC-provider.

Refusal to provide the Personal Data, which We may have need can lead to our refusal to provide You with some or all Services.

3.3.2. Information We collect automatically (applies even if You do not register User Account or use offered Services):

- a) IP address (IP addresses are assigned by Your Internet service provider) to the hardware used to access the Internet for connected devices in your home and/or workplace. Any devices using the hardware to access the Internet may broadcast the same IP address. At home, connected devices could include one or more laptop/desktop computers, tablets, mobile phones, smart/connected TVs and gaming consoles;
- b) Location;
- c) Information, that is being collected by the Google Analytics (operating system, browser and its settings, crash reports, screen resolution). Please pay attention to the fact, that usage of such information is also a subject to the relevant policies published by Google;
- d) Information, that is being collected via Cookies (see Section 9).

This information is useful to us because it helps us to better understand how You use our Services, so that We can improve them for You. **We may collect general anonymous analytical information regarding the use of the Services for their optimization.**

3.3.3. Information We receive from third parties. We do not exclude the possibility of collecting Your Personal Data from other sources, for example, from publicly available sources, such as social networks, Affiliates, Safe Analytics Providers, or from trusted third parties like payment providers. We use this information in addition to the Personal Data we have already collected about You in order to better personalize and improve our services for You, as well as to verify the Personal Data You provide Us with.

3.3.4. Customer Support. When interacting with our customer service, You may be asked to provide us with additional Personal Data.

4. HOW WE USE YOUR PERSONAL DATA

4.1. We may deliver, personalize, and improve our Platform, other Services by combining and using the Personal Data we have about You (including information We receive on and off our Services) to understand how You use and interact with our Services and the people or things You're connected to and interested in. We also may use the information we have about You for the following purposes:

4.1.1. **Services.** We may use the information we collect in connection with the Services We provide. We may use the information We collect to set up, alter, operate User Accounts; provide, operate, and maintain services; process and complete transactions; provide customer service and support and respond to inquiries; to send communications; to prevent fraudulent activity; personalize the

Services and provide advertisements, content and features that match User profiles or interests; research and develop new services, for any other purpose based on our legitimate interest;

- 4.1.2. **Website.** We may use the information We collect to administer and improve the Website and Platform, send You technical notices, updates, security alerts, invoices and other support and administrative messages;
- 4.1.3. **Promotional Communications.** We may use Your Personal Data to contact You with newsletters, marketing, or promotional materials and other information that may be of interest to You. You may opt-out of receiving any, or all, of these communications from us by following the instructions provided in any email We send or by following the unsubscription link in those emails;
- 4.1.4. **Analytics.** We may use Personal Data that's collected to understand general information and trends related to our Website, such as how many users have visited our Website during a given period of time, and the types of devices used.
- 4.1.5. **Respond to Inquiries** (Fulfil Your requests and when authorized by You);
- 4.1.6. To detect and defend against fraudulent, abusive, or unlawful activity;
- 4.1.7. To Send You technical notices, updates, security alerts, invoices and other support and administrative messages.

5. HOW WE SHARE YOUR PERSONAL DATA

- 5.1. Our Privacy Policy applies only to the Services, which are offered on the Website.
- 5.2. Under no circumstances shall We sell or rent Your Personal Data to third parties.
- 5.3. Website may contain links to other websites and file downloads from other websites. We do not exercise control over any website that may be linked to from within content on our Website. We are not responsible for the privacy practices or content of such websites.
- 5.4. **We do not transfer Your Personal Data to third parties, except cases, that are mentioned in this Privacy Policy which are next:**
 - 5.4.1. **With our partners.** We may share information with Affiliates, vendors, consultants, and other service providers (but not with advertisers and ad partners) and other Safe Analytics Providers who need access to such information to carry out work for us.
 - 5.4.2. **To comply with the law.** We may share information in response to a request for information if We believe disclosure is in accordance with, or required by, any applicable law, regulation, legal process or governmental request, including, but not limited to, meeting national security or law enforcement requirements. We may also share Your Personal Data with regulatory, state and law enforcement agencies, courts, fraud prevention agencies, licensing authorities or other third parties, in cases where applicable laws or regulations must be observed, as well as to implement, establish or protect our legal rights (when it is possible and appropriate, we will immediately inform You about disclosure of Your Personal Data to the third parties);
 - 5.4.3. **In an emergency.** We may share information if We believe it's necessary to prevent imminent and serious bodily harm to a person;

- 5.4.4. **To enforce our policies and rights.** We may share information if We believe Your actions are inconsistent with our user agreements, rules, or other Company's policies, or to protect the rights, property, and safety of ourselves and others;
- 5.4.5. **With our Affiliates.** We may share information between and among Company and any of our parents, affiliates, subsidiaries, and other companies under common control and ownership;
- 5.4.6. **With Your consent.** We may share information about You with Your consent or at Your direction.
- 5.5. We engage service providers to perform functions and provide services to Us. For example, We use a variety of third-party services to help operate our Services and to help us understand the use of our Services, such as Google Analytics (such services may collect following Personal Data, as IP-address, type of the used web-browser, patterns of use on the Website and location). We may share Your Personal Data with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use Your private Personal Data only on our behalf and pursuant to our instructions.
- 5.6. We may partner with third-party advertisers, ad networks to deliver advertising and content targeted to Your interests and to better understand Your use of the Services. These third parties may collect information sent by Your computer, browser, or mobile device in response to a request for content, such as unique identifiers, Your IP address, location or other information about Your computer or device.
- 5.7. Other information, that does not personally identify You as an individual is collected by Company (such as, by way of example, patterns of use) and is exclusively owned by Company. We can use this information in such manner on our sole discretion, deems appropriate.
- 5.8. As were mentioned above, when You send Us messages, We can keep them for administering of Your inquiries, for improving of our services. We shall not transfer information from such messages to third parties.

6. LENGTH OF DATA RETENTION AND GROUNDS FOR THE PROCESSING.

- 6.1. We retain Your Personal Data to fulfill our legal, operational, contractual and regulatory obligations. For each type of records, the recordkeeping requirements may vary so We guarantee that in no event shall We retain Your Personal Data longer than required. If You would like to know more about the length of retention for a specific data, please contact us.
- 6.2. We also keep a record of the fact that You have asked us not to send You direct marketing so that We can respect Your request in future.
- 6.3. Please note if You delete Your User Account, some personal data will remain in Company's system in anonymized form, it will be stored in such a way that it will be impossible to identify the User. This is necessary to give us an opportunity to check whether a User was previously registered or not. Company will use such data only in order to prevent fraud, when a Client who violates the Terms and Conditions and whose User Account was deleted will attempt to re-register within the Platform again. By saving such data, Company will rely on its legitimate interest.
- 6.4. We rely on the following grounds for the processing of Your Personal Data:

- 6.4.1. **Consent.** As it was already mentioned, by visiting the Website and/or by registering of the User Account and checking the box “I agree with provisions of terms of use” You provide us a with an informed consent to process and use Your Personal Data as specified in this Privacy Policy;
- 6.4.2. **Contractual Necessity.** Using of the Platform is governed by the Terms of Use and Accompanying Documents and You enter in an agreement with us by visiting the Website and/or by registering of the User Account and checking the box “I agree with provisions of terms of use”. Thus, we have to gather, process some Personal Data about You in order to provide You with Services.
- 6.4.3. **Legal Obligations.** In some times, We may be required by law to process some of Your Personal Data and to share this info with law-enforcement bodies or other state officials.
- 6.4.4. **Legitimate Interest.** This basis is used in different situations, for example, when We provide You with some support Services, updates, introducing new features and so on.
- 6.4.5. **Vital Interest.** It shall be noted, that some of Your Personal Data may be processed for matters of life and death.

7. SECURITY OF YOUR PERSONAL DATA

- 7.1. We provide the following safety measures regarding protection of Your Personal Data:
- 7.1.1. Evaluation of the effectiveness of used security measures, prior to the launch of the Website and its updates;
 - 7.1.2. Establishing rules to access to Personal Data processed by the Website, as well as ensuring registration and recording of all actions performed with PD in the information systems of the Website;
 - 7.1.3. Detection of the facts of unauthorized access to PD and the adoption of appropriate response measures;
 - 7.1.4. Restoration of PD that was modified or destroyed due to unauthorized access to them (within the framework of technical capability of the Company).
- 7.2. **WE USE, STORE AND PROCESS YOUR PD ON OUR SERVERS IN VARIOUS JURISDICTIONS, WHERE OUR FACILITIES AND/OR SERVICE PROVIDERS ARE LOCATED. BY CHECKING A RELEVANT BOX, VIEWED ON THE WEBSITE DURING REGISTRATION PROCEDURE, YOU AGREE TO THIS TRANSFER, STORING, OR PROCESSING. COMPANY WILL TAKE ALL STEPS REASONABLY NECESSARY TO ENSURE THAT YOUR PERSONAL DATA IS TREATED SECURELY AND IN ACCORDANCE WITH THIS POLICY.** Company protect Your Personal Data under internationally acknowledged standards, using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards Company use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. Company also authorize access to Personal Data only for those employees or contractors who require it to fulfil their job or service responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations. Third parties may be located in other countries where the laws on processing of Personal Data may be less stringent than in Your country. From time to time, the Personal Data may be also stored in

other locations, and in such cases, Company will ensure that the Personal Data will be stored and processed with the reasonable level of care and security.

8. KNOW YOUR RIGHTS

- 8.1. **You can access and change** certain types of the Personal Data through the User Account themselves without contacting Company (see Your User Account settings section).
- 8.2. **You may delete several types of Your account information, which were provided by Yourself, at any time from the relevant page.** But, We may retain certain Your Personal Data as required by law or for legitimate business purposes after You delete Your Account. If You initially consent to our collection of location information, You can subsequently stop the collection of this information at any time by changing the preferences on Your browser.
- 8.3. **You have the right to receive information regarding purposes of Personal Data** collection, regarding third parties, to which we disclose Your Personal Data, information, regarding safeguards that are applicable for secure storage of Your Personal Data, period of time for which Personal Data will be stored.
- 8.4. **You also have the right to demand full erasure of Personal Data concerning You sending Us a request via support [REDACTED],** We shall fulfil Your request in appropriate period of time. If there is no other lawful ground for storing and processing of Your PD, as prescribed by Applicable Law, Company shall erase such information. If there is another legal ground for such processing, Company shall notify You in appropriate period of time.
- 8.5. **You also have the right to demand restriction of the storing and processing of the PD,** if legal grounds for such demands have arisen / or are prescribed in Applicable Law.
- 8.6. **You have the right to object processing of Personal Data concerning Yourself** under circumstances, that are prescribed in applicable law. In case of such objection, Company shall restrain from processing of Your PD, if there will be no other legal grounds for continuing of processing.
- 8.7. Company takes Your rights very seriously. However, if You are of the opinion that We have not dealt with Your complaints adequately, You have the right to submit a complaint to the data privacy protection authorities responsible.
- 8.8. **You have the right to ask Company to provide You with a structured, list of previously provided PD** (and of the currently processed PD by the Company). You also can ask Us to transmit Your PD to previously chosen third party.
- 8.9. To send a request for delete, rectification and submission of PD please contact support via [REDACTED].

9. COOKIES

- 9.1. We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely or partially disabling the functionality and features they add to the Website and Services. It is recommended that You leave on all cookies if you are not sure whether You need them or not in case they are used to provide a Service that You use.
- 9.2. You can globally prevent the setting of cookies by adjusting the privacy settings of Your web browser (see Your web browser Help for how to do this). Be aware that disabling cookies will negatively affect the

functionality of this and many other Websites that You visit. Disabling cookies will also usually result in disabling of certain functionality and features of the Website and Services. Therefore, it is recommended that You do not disable cookies.

- 9.3. In general, We use cookies to determine such things as which parts of the Website are most visited and difficulties our Users may experience in accessing our Website. With this knowledge, We can improve the quality of User's experience on the Platform by recognizing and delivering more of the most desired features and information, as well as by resolving access difficulties.
- 9.4. Cookies are small text files that are placed on Your computer by websites (including our Website) that You visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the Website. Cookies are typically stored on Your computer's hard drive.
- 9.5. The cookies we set:
 - 9.5.1. **Account related cookies.** If You create an Account with us, then We Will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when You log out; however, in some cases they may remain afterwards to remember Your site preferences when logged out;
 - 9.5.2. **Login related cookies.** We use cookies when You are logged in so that We can remember that You are logged in. This prevents You from having to log in every single time You visit a new page. These cookies are typically removed or cleared when You log out to ensure that You can only access login-restricted features and areas when logged in. Your referral code also may be stored via cookies.

10. DATA TRANSFERS

- 10.1. When we transfer PD outside the European Union or EFTA, We ensure, that the adequate level of PD security is provided. During such transfer, We also ensure that adequate level of Your rights protection is also applied, on the basis of adequacy analysis of the third country Personal Data protection legislation, on the basis of contractual obligations, assumed by the PD recipient.

11. NOTIFICATION

- 11.1. If Company becomes aware of security systems breach, then We may attempt to notify You electronically so that You can take appropriate protective steps. Company may post a notice on our Website if the security breach occurs.
- 11.2. When the Personal Data breach is likely to result in a high risk to the rights and freedoms of Users, the Company will inform You.
- 11.3. In the event that Company is acquired by or merged with a third-party entity, We reserve the right, in any of these circumstances, to transfer or assign the information We have collected from our Users as part of such merger, acquisition, sale, or other change of control. If We become involved in a merger, acquisition, or any form of sale of some or all of its assets, We will notify Users before Personal Data is transferred and becomes subject to a different privacy policy. In the unlikely event of our bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of laws or

