

CODEX PRIVACY POLICY

Effective Date: April 2019.

Cryptagio OÜ (the “**Company**”, “**we**”, “**us**” and “**our**”) has introduced this Privacy Policy (the “**Policy**”) to provide you with the transparent and comprehensive information concerning our privacy approaches.

Before you consent to the collection and processing of your personal data by the Company, we ask you to read this Policy that is, together with our Terms of Use and Cookies Policy, a legally binding agreement between you and the Company.

This Policy explains how we process personally identifiable information when you use our Website as a Visitor or provide information to us in connection with your use of the Services as a User.

This Policy applies to your use of the Services, scope of which is defined in our Terms of Use.

Personal data categories. The Company may process from you contact and financial information, AML|KYC-related data, cookie identifiers and other similar technologies data. In-depth the list of personal data processed is explained in in a separate section of this Policy.

Purposes. Generally, these data processed for two main connected functions, i.e. website performance and functionality as well as Services provision. By extension, we together with our contractors and partners processes such data for marketing and advertising purposes as well as to comply with legal obligations deriving from AML|KYC regulations.

Rights. While using the Services, you enjoy and can exercise all the rights and freedom deriving from the data protection laws.

Please, pay attention that by accepting this Policy you expressly consent that your personal data may be transferred outside the European Economic Area (the “**EEA**”), since certain Company’s contractors are based within the jurisdictions that may not have the protections in place for personal data as extensive as those within the EEA. Nevertheless, the Company adapts the security and organizational safeguards to make any personal data transfer compliant with the applicable EEA data protection laws.

Please, read the full information below to familiarize yourself with our Policy in detail.

1. WHAT INFORMATION DOES THE COMPANY PROCESS AND WHY?

As you might already know, personal information includes any information that can be directly associated with a specific person and can be used to identify that person, including the information about your activities within the Services, particularly the information automatically collected.

We do not consider personal data to include information that has been anonymized so that it does not identify you as a specific user.

We collect the following types of personal information in order to provide you with the use of the Services, and to help us personalize and improve your experience.

1.1. Information collected automatically

When you use the Services, we collect information sent to us by your computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information. The majority of such data are anonymized and do not enable the Company to identify any specific individual.

The purpose of such processing is simply to improve the Services (including website) performance and customize it in light of your needs and interests.

1.2. Information you submit or have to submit while using the Services

a. Registration and communication with the Company via Services

We may collect and store any information you provide us when you use the Services, including:

- when you register your account;
- when you update your account information;
- when you participate in any discussions (chats, dispute resolutions) within the Services;
- when you communicate with the Company, in particular through “Submit a request”, Contact us” or other similar functions;
- when you participate in surveys, polls, questionnaires etc.;
- when you otherwise voluntarily leave your personal data within the Services.

As a rule, such personal data are limited to contact and financial information you leave us with (first and last name, phone number, email address or similar data as well as financial data added to your account).

Besides your consent, we also assume that our processing of such data is in line with your reasonable expectations as regard privacy.

The purpose of such personal data collection is to provide you with the Services and customer support, process transactions and send notices about the transactions, verify your identity, contact you via means you provided and otherwise improve your experience of using the Services.

In addition, for the fraud detection purposes, we may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

b. Financial transactions and AML|KYC-related data

When you use the Services, you are likely to be engaged in financial transactions. As a result, the following data may be left within the Services which we may process financial information, including virtual currencies, your transactions and other data connected with selling and purchasing of digital assets within the Services.

In order to meet three related legal obligations, i.e. to (i) comply with the applicable AML|KYC laws and regulations, (ii) process financial transactions, (iii) verify your identity, the Company processes the following data in accordance with the internal procedures:

- personal data directly related to your identity with the respected documents supporting such information;
- data related to your place of residence with the respected documents supporting such information;
- data necessary for other checks and procedure in connection with AML|KYC (to prove source of funds, check sanction lists etc.);
- other data requested by AML|KYC providers to verify your identity.

For additional compliance, the Company may at its own initiative monitor or record virtual currency transactions. By communicating with the Company, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

1.3. Data from external resources

We may also obtain information about you from third parties such as social networks. You may choose to provide us with access to certain personal information stored by third parties such as social media sites, including Facebook. By associating an account managed by a third party with your account and authorizing the Company to have access to this information, you agree that the Company may collect, store and use this information in accordance with this Policy. If you associate your account in such way, the Company's purposes for data processing are similar as those enshrined in paragraph 1.1. of this Policy.

1.4. Cookies and Similar Technologies

When you visit or interact with our Services, we or our authorized service providers may use cookies, web beacons, and other similar technologies for storing information to help provide you with a better, faster, and safer experience and for advertising purposes.

Please, refer to our Cookies Policy for additional information as to our approaches in this area.

1.5. Sensitive Data

Unless you expressly agree, the Company does not collect or process your sensitive data.

1.6. Personal Data of Minors

We are concerned about the privacy of children. Pursuant to our Terms of Use, we provide the Services only to those individuals, who have full legal capacity for civil rights and conducts. If you are under the age of 18, you will need to get your parent's/guardian's permission before submission of any personal data to the Company. If you are underage, and there are no data as to your parent's/guardian's

permission to use our website, we will not collect or process your personal data, and you will have limited use of our website

2. HOW DOES THE COMPANY PROCESS THE INFORMATION COLLECTED?

Company's processing is limited to the purposes identified in this Policy.

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from other companies and use it to improve and personalize the Services, content, and advertising.

We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

We will ask your consent before using collected information in other purposes.

3. HOW DOES THE COMPANY PROTECT AND STORE PERSONAL INFORMATION?

We store and process your personal information on our computers elsewhere in the world where our facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

We have implemented commercially reasonable technical and organizational measures designed to secure your personal information and other information from accidental loss and from unauthorized access, use, alteration or disclosure.

All electronic personal information is transmitted to other Web-sites through the use of Secure Socket Layer (SSL) and Transport Layer Security (TLS) encryption technologies to ensure that your information is fully encrypted and sent across the Internet securely.

An extra layer of security is Two Factor Authentication that is required for every session if set up by the User.

Please note that the transmission of any data over the Internet using personal computers or mobile devices is not completely safe and therefore we cannot guarantee the security of documents submitted to our platform. Any transmission of such documents when it is performed towards the platform is at your own risk. As soon as we receive your private information, we implement strict security measures and procedures to avoid unauthorized access from any third party.

4. HOW LONG WILL THE COMPANY STORE YOUR PERSONAL DATA?

4.1. General rule

Your personal data will be stored by the Company as long as it is necessary for the purposes for which the personal data are processed. As a rule, we will retain your personal data as long as your account is in existence or as long as there is a need to provide you with the Services you requested.

4.2. Marketing data

As to personal data collected when you registered on our mailing list or for the newsletter, will be stored as long as you are interested in receiving our emails. We consider that you're interested in this until you unsubscribe from the mailing list or from the newsletter by clicking the respective link contained in each of our emails.

4.3. Cookies

To see the lifespan of cookies storage, please, refer to our Cookies Policy.

4.4. Special situations

In light of financial transactions flow within the Services, the Company and its contractors (any other third parties) may be bound by the legal obligations to retain the data for the definite period of time, specified in different documents. In particular, the Company may be bound to retain all the copies of your personal data (all forms and authorizations obtained from your) for a minimum of three years from the date of inquiry to disclose them for AML|KYC purposes.

5. HOW DOES THE COMPANY SHARE PERSONAL INFORMATION WITH THE THIRD PARTIES AND WHY?

We may share your personal information in the following manner and for the following purposes:

For Legal Reasons. We may disclose personal information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims. We may also share such information if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use, or as otherwise required by law. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Legal requests must meet the following requirements before we will consider complying with them: (i) must be in writing and legally issued by a relevant government entity; (ii) must be as narrowly defined as possible.

The Company may also disclose the Personal Information within the AML/KYC procedures and the applicable laws. Regarding this specific situation, the Company is entitled to engage the third-party KYC providers on the contract basis and in accordance with the data protection regulation. The third-party KYC providers will be engaged in order to:

- Collect, store and verify the information and documentation within the KYC procedures as described herein;
- check the information and documentation with regard to sanction lists and politically exposed person list;
- provide the Company with reports after the information and documentation have been collected, verified and checked.

For Business Transactions. The Company is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

For Statistical Analysis. The Company may provide non-personal, summary or group statistics about our customers, sales, traffic patterns, and related Web site information to reputable third-party vendors, but these statistics will include no personally identifiable information.

For Legal Compliance. The Company may provide personal information to law-enforcement agencies or similar authorities in order to comply with anti-money laundering and counter-terrorist financing verification requirements.

For Transaction Flow. The Company may disclose the Personal Information with the third parties involved in the execution of transactions, including but not limited to our banking partners, transactions facilitators and payment providers, as well as providers of live chat software, etc.

Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in your country.

If you open the account directly on a third-party website or via a third-party application, any information that you enter on that website or application (and not directly on the Company website/application) will be shared with the owner of the third-party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. The Company is not responsible for the content or information practices of such third parties.

The Company may use the following services to collect, manage, analyze or otherwise process some of your personal data.

- Google Analytics. Through our Website, we use this service and its reports in order to better understand the website traffic and webpage usage. But be sure: Google Analytics does not identify individual users or associate your IP address with any other data held by Google. Also, we do not allow Google to use or share our analytics data for any purpose besides providing us with analytics information.
- Google Cloud. We use the service for the hosting purposes where we collect and process the data permissible pursuant to the applicable privacy policy which may be accessed here: <https://www.google.com/policies/privacy/>. We use this service for the complete security of your data, since Google Cloud services are certified under the Privacy Shield.
- Mailgun. The Company uses Mailgun in order to communicate with you via email. Therefore, while using this service, we collect such personal data of yours, as email addresses and other information related to them. Whereas Mailgun may transfer such information to third parties (when required by law; to its processors etc), you may be sure that Mailgun fully complies with the applicable data protection laws. In any event, you can opt out of our mailing list if you choose the unsubscribe service provided by Mailgun. For further information about the type of personal information Mailgun collects, refer to the Mailgun Privacy Policy.
- Zendesk. We use Zendesk in order to organize the customer service platform on our Website. This enables us to provide you with help center services, specifically to process the requests submitted and manage correspondence with use. Whereas Zendesk may use cookies to evaluate your use of the platform, compile reports on platform activity for platform operators and provide other services related to platform usage and internet usage, and transfer this information to third parties where required by law or if such third parties process the information on Zendesk's behalf, the service fully complies with the applicable data protection laws, as may be extracted from Zendesk Privacy Policy and cookie policy can be found at: <https://www.zendesk.com/company/privacy/> and <https://www.zendesk.com/company/customers-partners/cookie-policy/?cta=cook>

- Remarketing services. We also use one or more third-party remarketing services (including Facebook Ads, Twitter Ads, Google Ads, LinkedIn Ads, Buffer) to advertise on third party websites to previous visitors to our Services. These third-party remarketing service providers use cookies to serve ads based on a past visit to the Services. Any data collected by such third party remarketing service providers will be used in accordance with this Policy and the privacy policy of such third party remarketing services provider.
- AML|KYC providers (SUM AND SUBSTANCE LIMITED, United Kingdom). In order to comply with the applicable legal obligations, the Company may engage the providers of AML|KYC services and store collected information according to legislation requirements, and depending on user residency the information can be stored in different jurisdiction. Please, note that such providers are bound by the applicable laws and request your personal data deriving from such laws. Due to the complexity of such verification activity, such providers may additionally engage the processors and/or sub-processors to provide the services and adhere to the laws. Also, such providers may disclose the personal data to third parties (law enforcement agencies etc.) if so required by the law.
- Other external services. The Company may cooperate with our third parties in order to achieve those purposes described in this Policy. Please, be sure that in case we engage any other third party we bear in mind the provisions of the applicable laws, particularly Article 28 of the General Data Protection Regulation. In no event, we will share your data with any counterparty that does not provide the adequate level of personal data protection.

6. YOUR RIGHTS

As to your personal data collected and processed by the Company, you have the following rights:

- to access to your personal data processed by the Company, as specified in the section below as well as to obtain your personal data in a structured, commonly used and machine-readable format in order to be able to transmit it to the other controller of data;
- to request from the Company to rectify your personal data requiring corrections;
- to request to erase personal data as long as their processing is no longer necessary for why it was actually collected.
- to restrict the processing of your personal data by the Company.
- to object to processing of your personal data.
- to withdraw your consent at any time by contacting us.
- to lodge a complaint with a supervisory authority.

Any requests to exercise your rights can be directed to the Company through the contact details provided below. These requests are free of charge.

We also find it relevant to share [the following link](#) to give you better understanding of what these rights might mean to you.

7. COMPANY'S OTHER PRIVACY COMMITMENTS

7.1. Cross Border Transfers of Personal Information

The Company is committed to adequately protecting your personal information regardless of where the data resides and to providing appropriate protection for your personal information where such data is transferred across borders, including outside of the EEA.

In any event, the AML|KYC and certain other procedures, carried out with a help of Company's contractors, will require an in-deep and comprehensive cooperation. In course of such cooperation, the Company may transfer your data outside the EEA to perform identity verification or checking, as such companies may be based in the jurisdictions that do not have the protections in place for personal data as extensive as those within the EEA. Nevertheless, the Company adapts the security and organizational safeguards to make any personal data transfer compliant with the applicable EEA data protection laws. Such precautions are, as a rule, specified in the legally binding documents of Company's counterparties.

In order to perform the AML|KYC and certain other procedures required by law and mentioned above your data may be disclosed to a credit reference or fraud prevention agency, which may keep a record of that information. Such credit reference or fraud prevention agency may disclose the fact that a search of its records was made to its other customers for the purposes of assessing the risk of giving credit, to prevent fraud and to trace debtors.

7.2. Breach Notifications

On a condition your personal data are be under the breach, we would inform you and the respective data protection agencies as to the accidents without undue delay, if there are high risks of violation of your rights as data subject.

7.3. Access and Change of Personal Information

You can edit your personal information and/or close your account by sending a request at support@codex.one considering the requirements hereof. If you close your Account, we will mark your account in our database as "Closed," but may retain personal information from your account for 5 (five) years from the date of the account closure to comply with KYC|AML framework, to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our User Agreement, or take other actions as required or permitted by law.

If you would like to limit the processing of your personal data, please feel free to contact us at the contact details as provided below. Please note however, that all information requested from you is obligatory to be provided by you unless stated otherwise. Should you fail to provide us with your personal data, we may not be able to process your request for our product and / or services.

7.4. Compliance with the data protection laws

The Company adheres to the applicable data protection laws and regulations that directly bind the Company's processing of personal data. Among others, the Company adhere to the laws of Estonia, the domestic jurisdiction of the Company.

8. POLICY CHANGES

You may be sure that there will be no radical and profound changes or turnaround regarding your privacy.

Still, Company may change this Policy from time to time, bearing in mind our privacy commitments before each individual and society overall. To make sure that we do not abuse your trust, please, periodically check this page to ensure that you are satisfied with any changes.

Additional notifications on any amendments may be sent to your account and/or your email address.

If you have questions or concerns regarding this Policy, you should contact us by e-mail support@codex.one

For the complete transparency, we also provide you with the Company's details:

Registered Name: Cryptagio OÜ

Registered Code: 14477639

Registered Address: Harju maakond, Tallinn, Lasnamäe linnaosa, Punane tn 6-219, 13619