

# § 1. PRIVACY POLICY

## 1.1. The Website

A privacy policy is a document that explains how an organization handles any customer, client or employee information gathered in its operations. Privacy Policy specifies terms and conditions of protecting personal data of the User of: Exp Asset and other applications, plugs and Services connected to them.

## 1.2. Definitions

For the purpose hereof, definitions are included in the Terms and Conditions available [here](#).

## 1.3. Data Safety

The controller in respect of the personal data ensures of making every effort to ensure that personal data are processed with the greatest respect for the privacy of the data provider and with the utmost care for the safety of the processed personal data, and in particular ensures of taking all legal measures to safeguard the personal data collections.

## 2.1. Personal Data of the Controller

The data controller is a company of

Silesia Capital Management Ltd. Springates East Government Road Charlestown, Nevis, West Indies Saint Kitts And Nevis and Crypto Asset Management Ltd, Market Square, Yamraj Building 3<sup>rd</sup> Floor, P.O. Box 3175, Roam Town, Tortola, British Virgin Islands, which pursuant to art. 27 of the European Parliament and Council regulation (EU) 2016/679 dated 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR) appointed a representation in the European Union, i.e. a company of

Data World Protection LTD, C 220 d Trident Business Centre 89 Bickersteth Road, London, United Kingdom, SW 17 9 SH, company number 11602521.

WHAT IS PRIVACY POLICY?

WHO IS THE CONTROLLER?

### **3.1. Legal Basis**

The basis for data processing of the User is:

1. in case of using the Services available within the Website by the User - processing of personal data is necessary to provide the Services;
2. in case of data processing for the marketing purposes, profiling or receiving commercial information - the User's consent as a person, who provides the data.

## **WHAT IS THE LEGAL BASIS OF DATA PROCESSING OF THE USER?**

### **3.2. Consent**

During the Registration process of the User Account within the Website, the User gives a consent to collect and process personal data by the controller in the way and purposes specified in the consent and herein. Providing the User's personal information and consent to their processing is required to perform most of the Services. The User is responsible for providing false personal data.

### **4.1. Registration**

The Registration of the User Account within the Website requires filling the form including the following personal data: Company name, Register number / Tax / Vat number, Full name, Email, Country. During the Registration the User specifies own user name and a password, which are used to log in to the Website.

## **WHAT KIND OF DATA DO WE COLLECT?**

Browsing the content of the Website does not require the User to provide personal data, unless the access is conditioned upon the Registration. Lack of Registration of the User account results in limitations in using the Services.

#### **4.2. User Account**

Within the User Account, the controller collects additionally the following data concerning the User, which are provided after the Registration to the Website optionally:

1. photos added by the User (Avatar);
2. data included in the identity card, passport or other document provided by the User in order to confirm own identity.

#### **4.3. Other Data**

It is required to provide other personal data in justified circumstances, particularly, in the event of providing a justified request to the Service Provider for the sharing data with the authorities and the User shall be informed each time about that, and also if it is required to execute a payment.

#### **5.1. Scope of Data Collection**

The controller collects data provided by the User during using the Services within the Website, including those concerning purchases and transactions, and User's interactions with other Users as well as contents concerning complaints made by the User.

#### **5.2. Data Processing Rules**

The controller may process data describing the way of using the Website by the User and provided Services, in particular, such as signs identifying the end of the telecommunications network or teleinformatic system used by the User, information about the start, end and scope of the use of the Service, information about having used the Service by the User.

#### **6.1. Collecting Data on Location and Devices**

During using the Website, the controller receives data on IP address of the User, proxy server, operating system of the web browser and extensions, device ID and its functions, and the name of the internet service provider (ISP)

**PUBLISHING AND PROVIDING DATA,  
WAYS OF USING THE WEBSITE**

**TOOLS AND USER'S LOCATION**

or mobile network operator. Use of the Website by the User via mobile device allows the data controller to access location data of the User.

### **7.1. Scope of Personal Data Use**

The scope of using personal data by the controller depends on the Services used by the User within the Website and User's preferences. The controller shall process User's personal information in order to:

1. make, establish the content, change, execute or terminate the contractual relationship between the controller and the User, regarding providing the Services within the Website;
2. authenticate and authorize access to the Services;
3. market, promote, develop and improve own Services, including direct marketing, as well as to advertising purposes, and other actions required to User's business activity;
4. contact, send notifications and reminders to the User;
5. fulfil legal duties by the controller in connection with running business activities;
6. recover the debts;
7. provide advertisement service of the User;
8. maintain, develop and analyze a relationship with the User, and creating statistics;
9. profile data of the User;
10. send commercial information electronically;
11. provide the Service of "Newsletter";
12. generate collective and statistic data which allows identification of the User.

**HOW DO WE USE COLLECTED DATA OF  
THE USER/PURPOSE OF THE DATA  
PROCESSING**

### **8.1. Profiling of the User**

Processing personal data by the controller includes profiling the User of the Website according to their behaviour, interests, payment credibility and purchase preferences. Profiling aims at satisfying User's needs and assuring

**PROFILING COLLECTED DATA**

accuracy of selection of suggested services to the User. Based on profiling, the controller may convey contents to the User from time to time, which potentially may interest them, in particular additional information, marketing content, proposals, and surveys.

## **8.2. Profiling Resignation**

Based on profiling, we target displayed advertisements and measure their effectiveness. The User may resign from targeted advertising by sending appropriate request to the controller.

## **9.1. Website Traffic Analyses**

The controller represents that it is allowed to use tools designed to analyze traffic within the Website, such as Google Analytics and other similar. The controller is allowed, in particular, to collect information about the User's activity and behavior, such as:

1. visiting the content of the Website;
2. clicking a hyperlink or using specific content within the Website;
3. interacting with the content of the Website;
4. interacting with the other User.

## **9.2. Using Data by the Controller**

Data specified hereinabove are used by the controller solely for the purposes of market research and traffic within the Website, for statistical purposes, in particular, for the evaluation of interest in the posted content on the Website, and improving the content of the Website and provided Services within the Website. If the User uses the Service via mobile device, the controller is allowed to collect, in particular, the identity of mobile device, internet service provider, and subscriber. The collected data shall be processed in an anonymous manner and used only for statistical purposes or to ensure proper use of the Website.

## **TRAFFIC ANALYSES**

### **10.1. Data Storage Period**

The User's personal data are stored for the whole time of having the User Account or providing services, but if the User has agreed to process data also after removal of the User Account from the Website and discontinuation of service provision - then until revoking the consent.

## **HOW LONG ARE THE USER'S DATA STORED?**

### **10.2. Data Storage after Closing the Account**

The controller stores personal data of the Users after closing the User Account also if it is necessary to: fulfil legal duties, settle disputes, enforce payments of the User on the basis of the User's activity within the Website, maintain safety, prevent fraud and misuse.

### **11.1. Rights of the User**

The controller represents that the accepted rules of personal data processing ensure all Users to exercise their rights on the basis of the applicable law, in particular:

## **WHAT ARE THE RIGHTS OF THE USER?**

1. The right to access content of the data;
2. The right to correct/update the data;
3. The right to remove the data;
4. The right to limit data processing;
5. The right to disagree to data processing;
6. The right to transfer the data;
7. The right to share copies of the data;
8. The right to make a complaint to the supervisory body
9. The right to revoke the consent to data processing at any time, regardless of the compliance with the processing law, which has been provided on the basis of the consent before its revoking.

### **11.2. Contact with the Controller**

In order to exercise the rights specified hereinabove, the User may, at any time,

contact the controller via e-mail: [dpo@exp-asset.com](mailto:dpo@exp-asset.com).

### **11.3. Consequences of Filing a Statement to Discontinue Personal Data Processing**

Filing a statement to discontinue personal data processing by the User or to delete them, disable using the Website and is a basis of removing the User Account.

### **12.1. Data Sharing**

The controller shares personal data of the User to the partners cooperating in maintaining the Website and providing services available within the Website. Sharing the data to the third parties occurs pursuant to the provisions of applicable law.

### **12.2. Data Sharing outside the EEA**

The personal data processed by the controller shall not be made available to the parties, which are not included hereinabove, in a form that would allow any kind of User identification, unless the User has given a consent, or if the obligation to provide the collected data is based on applicable law.

### **ARE USER'S PERSONAL DATA TRANSFERED TO THIRD PARTIES OR OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)?**

The User's personal data may be shared with the countries outside EEA, i.e.: Saint Kitts And Nevis. However, the controller uses servers to store data which are located in EEA countries.

### **12.3. Data Sharing**

The controller applies approved by the European Commission Standard Contractual Clauses, constituting legal mechanisms for the data transfer outside The European Union, which aims at guaranteeing privacy and safety of the data.

### **12.4. Lack of Contact**

The controller shall remove from the system any names, addresses, other User's data as well as the User Account, if e-mails or other document shall be replied

annotated “addressee not known”, “addressee deceased”, “undelivered”, “unknown” or similar and if the User does not respond to the controller’s e-mails.

## **§ 2. COOKIE POLICY**

### **2.1. Using Cookies**

The controller uses cookies to ensure the highest quality of the Website and provided Services. Cookies are analyzed to determine which subsites are visited the most, which browsers are used by visitors and whether the Website structure is free of errors. Cookies allow to assure safety of the User Accounts.

Cookies stored on the User's end device are allowed to be used by advertisers of the controller and other entities that affect the quality of the offered Service.

### **2.2. Cookies Types**

Cookies are files stored on the User’s device which allows to identify a device, secure the access to the Website and identify attempts to access the User Account via other devices.

The controller may use the following types of cookies:

- temporary which are deleted after leaving the site or turning off the web browser;
- permanent that are stored on the end User's device for unspecified period of time, or until the User manually deletes them;
- statistical to track traffic on the Website;
- functional, allowing personalization of the site in relation to the User;
- advertising to provide the User with content adjusted to his personal preferences;
- necessary and safety, regarding the maintenance of safety rules within maintenance of the Website and authentication rules.

**USING COOKIES BY THE CONTROLLER**

**COOKIES TYPES**



## PURPOSES OF USING

### 2.3. Purposes of Cookies Using

Cookies may be used to identify the User during visits on the Website, to remember User's preferences and to display suitable contents adjusted to User's settings. The controller uses cookies for the following purposes:

- optimization, increasing efficiency and quality of the Service;
- correct feature configuration available within the Website;
- to personalize of the displayed content and advertisements matching to the visitors of the Website;
- to maintain the User session of the Service (after logging in), so the User does not have to re-enter the login and password on each page;
- keeping safety and reliability of the Website;
- to collect and use general and publicly available static data through analytical tools.

### 2.4. Consequences of cookies blocking

The User may delete cookies at any time by using the features available in the used web browser. Restricting or blocking cookies through the web browser used by the User or by the Registered User do not disable participating in the Website, however, it may cause difficulties or irregularities in operation for which the Service Provider is not liable. Therefore, it is recommended to use software which enables cookies operation.

## LIMITATIONS OF USING COOKIES AND OTHER INFORMATION ABOUT COOKIES

### 2.5. Changing Settings of Cookies

The User may change own cookie settings at any time by specifying the conditions of storing and granting access to cookies on User's device. Changes to the settings referred to hereinabove may be made via the settings of the web browser or via the configuration of the Service. These settings can be changed to block automatic cookie operation in a User's web browser settings or to notify every time when cookies are placed on a device.

### 2.6. Changing Settings of Cookies

The User may check other information about cookies using websites of:

More information about using cookies by advertisers can be found:

- European Interactive Digital Advertising Alliance (EU);
- Internet Advertising Bureau (EU)

Help pages concerning cookies management in the most popular web browser, the User also finds on the websites:

- Google Chrome;
- Internet Explorer;
- Mozilla Firefox;
- Safari (desktop version);
- Safari (mobile version);
- Android Browser;
- Opera;
- Opera Mobile.

## **§ 3. APPLIED ORGANIZATIONAL AND TECHNICAL MEASURES; FINAL PROVISIONS**

### **3.1. Representations of the Controller**

The controller represents that technical and organizational measures to protect processed personal data are applied. The measures are appropriate to the threats and categories of data subject to protection, and in particular, the controller protects the data against unauthorized access, unauthorized obtaining, processing against the law and against changing, losing, damaging or destructing. The Website may include hyperlinks to other websites. The controller is not liable for the data protection policy applied by these websites. The controller undertakes to take utmost care to ensure that the User is aware of the entity liable for the Services in the event of following the hyperlink to the other website, which does not belong to the Service Provider.

### **3.2. Processing Rules**

The controller complies with the following principles of personal data

**APPLIED ORGANIZATIONAL AND  
TECHNICAL MEASURES**

**DATA PROCESSING RULES**

processing:

- collected personal data are stored solely on such data storages that are protected against third party access;
- data security surveillance is performed throughout the whole period of accessing the data so as to ensure protection against unauthorized access, damage, destruction or loss in particular;
- data are shared with eligible entities solely on the basis of applicable law;
- the confidentiality of personal data is maintained.

### **3.3. Privacy Policy Chances**

The controller may change this document and the User shall be informed about it in a way to enable the User to familiarize with the changes before they are effective. If the User has reservations regarding introduced changes, the User may close the User Account. Further using of the Website after publication or sending notifications about Privacy Policy changes is understood as an act of agreement to collect, use and share personal data of the User pursuant to the amended content of the document.