

## PRIVACY POLICY

*Last update: March, 22 2019*

This Privacy Policy explains what personal information of yours will be collected by EXSCUDO when you access the web pages located at [exscudo.com](http://exscudo.com) and any subdomains thereof (the "Sites"), interact with the associated mobile application known as "Channels", and/or use the Services (including through the websites and/or services of our partners and third-party service providers); how EXSCUDO will use that information; and how you can control the collection, correction and/or deletion of information. We will not use or share your information with anyone except as described in this Privacy Policy. Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms and Conditions available at [exscudo.com/docs/tc.pdf](http://exscudo.com/docs/tc.pdf).

### 1. Personal data we process; purposes, legal basis, and duration of processing

(a) To comply with our obligations under the Applicable Laws, including without limitation the Money Laundering and Terrorist Financing Prevention Act and the Accounting Act, we collect and process:

- i. Full name;
- ii. Date of birth;
- iii. Place of birth
- iv. Country of your main residence;
- v. Citizenship;
- vi. Mobile tel. number;
- vii. E-mail address;
- viii. Identification Documents, including their respective copies (e.g. passport, ID card, driver's license);
- ix. Residential address confirmation, including their respective copies (e.g. utility bill, bank statement, etc.);
- x. Mailing address (if different from the above);
- xi. Jurisdiction(s) of your tax residence and respective tax identification number(s);
- xii. Employment status and contact details of your employer;
- xiii. Details of any transactions involving you (including without limitation Trading Transactions); and/or
- xiv. Other personal information or commercial and/or identification information – whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under Applicable Laws.

We will keep this information until five years has passed from the end of the calendar year when you last had an Account or Channels Account with us. We will preserve your personal information recorded in our accounting

journals and ledgers for seven years as of the end of the financial year when a business transaction was recorded.

- (b) To provide our Services to you (i.e. to be able to perform our contractual obligations to you), we collect and process your name; your credentials necessary to access the Sites, Channels and/or Services (including without limitation your username and password hash). This also includes the processing of your contact details with the purpose of sending you service related messages including via post, email, mob. phone and/or SMS.

We will preserve these data for as long as you have an Account and/or Channels Account with us.

- (c) To satisfy our legitimate interests of ensuring the security and maintaining or improving the usability of our Sites, Channels, and Services, we may collect and process technical and geolocation information about your devices and/or browsers; monitor your usage of and activities on our Sites, Channels and Services.

We will anonymize this data no later than at the time when your last Account or Channels Account with us is closed, or if there is a security review in progress involving this data, at the end of such review. Once we have anonymized this data, it will no longer be possible to trace it back to you, and thus it ceases being personal data.

- (d) With your consent, we may collect and process any other personal information about you for the purposes disclosed to you when requesting your consent. Such purposes may include the use of your contact information to send you promotional messages including via post, email, mob. phone and/or SMS.

Note that you may withdraw your consent at any time, and we will stop processing the data on this basis upon receipt of your withdrawal. Note however, that doing so will not affect the lawfulness of processing based on your consent before its withdrawal.

- (e) In order to help you organize your communications, EXSCUDO may help you identify your contacts who also use the Sites/Services, you may provide us, subject to the Applicable Laws, the mobile phone numbers and respective contact names in your mobile address book on a regular basis, of those contacts who are the Users of the Services. You are also entitled to add other information to your Account/Channels Account, such as a nickname and/or profile picture.

Note that sharing this personal information with EXSCUDO is consent based and you may withdraw your consent at any time, and we will stop processing the data on this basis upon receipt of your withdrawal. Note

however, that doing so will not affect the lawfulness of processing based on your consent before its withdrawal.

## 2. Transfers of personal data

EXSCUDO will never disclose or transfer your personal data to third parties without your explicit permission, except as set forth in this section of our Privacy Policy.

Note that if you have given us permission to make some of your personal data publicly available (e.g. by posting public comments on our blog or news page), or to disclose it to third-party controllers, then copies of this data may remain available outside our control, even if you later withdraw your permission (e.g. by removing your comment).

- (a) Third-party processors. We may store and process your personal data in locations outside our direct control, contracting specialized service providers (processors) for such storage and processing. We will only use the processors who are either based in the EU or in such third countries, territories or specific sectors within those countries, that, according to the decision of the Commission, ensure an adequate level of protection of personal data. For more information, see [https://ec.europa.eu/info/law/law-topic/data-protection\\_en](https://ec.europa.eu/info/law/law-topic/data-protection_en).

Please also note that we may share/disclose your personal information with/to certain selected third parties (including without limitation our Affiliates, virtual currency exchanges and/or wallet service providers, banks, authorized payment institutions, e-money and/or other financial institutions, business partners, their respective Affiliates and/or any other third parties at our choice).

We may share/disclose your personal information with third parties for the following purposes:

- To procure execution of Trading Transactions with Cryptocurrencies and/or EON against fiat currencies (and *vice versa*) and/or provide any other applicable Services to you under our Terms and Conditions;
- To fulfil our obligations under Applicable Laws, if subject to subpoena and/or other legal proceeding, and/or if we reasonably

believe that such action is necessary to (i) comply with the law and/or the reasonable requests of law enforcement; (ii) to enforce our Terms and Conditions and/or to protect the security or integrity of our Sites and/or the Services and/or any other applicable legal arrangements; and/or (iii) to exercise or protect the rights, assets, property and/or security/personal safety of EXSCUDO, our Users or others;

- To undertake applicable measures in order to recover debt due or in relation to your insolvency; and/or
- We seek information necessary to maintain and/or develop customer relationships and/or Services.

Should you need any further information on the respective third parties whom your personal information has been disclosed to and/or shared with, you can contact us at [help@exscudo.com](mailto:help@exscudo.com).

(b) Change of control. If we buy or sell/divest/transfer EXSCUDO (including any shares in EXSCUDO), or any combination of its products, services, assets and/or businesses, your information such as customer names and email addresses, and other User information related to the Services may be among the items sold or otherwise transferred in these types of transactions. We may also sell, assign or otherwise transfer such information in the course of corporate events, mergers, acquisitions, insolvency, dissolutions, reorganizations, liquidations, similar transactions or proceedings involving all or a portion of EXSCUDO. You will be notified via email and/or a notice on our Sites of any substantial change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

3. Behavioral targeting. We partner with third parties to display advertising on our Sites/Services and manage our advertising on other sites. Our third-party partners may use technologies such as cookies to gather information about your activities on the Sites and other sites in order to provide you advertising based upon your browsing activities and interests. The only way to completely “opt out” of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser and/or mobile device. Please refer to your browser’s or mobile device’s technical information for instructions on how to delete and disable cookies, and other tracking/recording tools (to learn more about cookies, clear gifs/web beacons and related technologies, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative’s online resources, at <http://www.networkadvertising.org>). If you access the Sites on your mobile device, you may not be able to control tracking technologies through the settings.
4. Access and rectification. For current EXSCUDO Users, you can review, correct, update or delete inaccuracies to the information about you that EXSCUDO keeps on file by logging into your Account/Channels Account to update your password

and billing information. Alternately (and for former EXSCUDO Users), you can contact us directly at [help@exscudo.com](mailto:help@exscudo.com). We will acknowledge your request within seventy-two (72) hours and handle it promptly.

5. Channels messages. Please note that EXSCUDO does not normally retain your messages. Once your messages (including without limitation photos, videos, voice recordings, files and other files) are delivered, they are deleted from our servers. User's messages are stored on the User's own device. If any message cannot be delivered immediately, EXSCUDO may keep it on its servers for up to 30 days while trying to deliver it. In case a message is undelivered upon expiration of this period, it shall be deleted. Certain content (for example popular media messages and/or files frequently shared by the Users), however, may be retained on our servers for a longer period of time in order to make delivery of these messages/files more efficient.
6. How we protect your information. EXSCUDO is concerned with protecting your privacy and data, but we cannot ensure or warrant the security of any information you transmit to EXSCUDO or guarantee that your information on the Sites may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards. When you enter sensitive information (such as log in credentials) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL). No method of transmission over the Internet or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security on our Sites, you can contact us at [help@exscudo.com](mailto:help@exscudo.com).
7. Compromise of personal data. In the event that personal data is compromised as a breach of security, EXSCUDO will promptly notify our Users in compliance with Applicable Laws.
8. Notification procedures. It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business-related purposes, to you via email, mob. phone, SMS, written or hard copy notice, or through conspicuous posting of such notice on the Services, as determined by EXSCUDO in its sole discretion. We reserve the right to determine the form and means of providing notifications to you, provided that you may opt out of certain means of notification as described in this Privacy Policy.
9. Links to third-party websites. We are not responsible for the practices employed by websites or services linked to from the Sites or Services, including the information or content contained therein. Please remember that when you use a link to go from the Sites or Services to another website or service, our Privacy Policy does not apply to such third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies.

10. Social Media Widgets: Our Sites/Services may include social media features, such as the Facebook Like or Twitter button and other widgets, that may be displayed on our Sites/Services. These features may collect your IP address and which page you are visiting on our Sites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Sites. Your interactions with these features are governed by the privacy policy and terms and conditions of the organization providing them.
11. Changes to our Privacy Policy. All changes to this Privacy Policy become effective when they are posted on this page. When we change the policy in a material manner, we will let you know via email and/or a notice on our Sites, prior to the change becoming effective and update the 'effective date' at the top of this page.
12. Questions and complaints. If you have any questions about this Privacy Policy, the practices of our Sites, or using the Services, please contact our Data Protection Officer at [help@exscudo.com](mailto:help@exscudo.com).

If you feel that your rights have been violated, then you can lodge a complaint with the competent supervisory authority (Estonian Data Protection Inspectorate), whose contact details are available from <http://www.aki.ee/>.