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## PRIVACY POLICY

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This Privacy Notice describes how Eidoo Tech LTD ("**Eidoo app**") collects and processes your personal information through the Eidoo app websites and applications that reference this Privacy Notice. Eidoo app refers to an ecosystem comprising Eidoo app websites (whose domain names include but are not limited to [www.eidoo.app](http://www.eidoo.app)), mobile application, clients, applets and other applications that are developed to offer Eidoo app Services, and includes independently-operated platforms, websites and clients within the ecosystem.

### Definitions

In accordance with the privacy regulations, the terms below have different meanings:

- "**Eidoo app Operators**" refer to all parties that run Eidoo app, including but not limited to legal persons, unincorporated organizations and teams that provide Eidoo app Services and are responsible for such services. "Eidoo app" as used in this Policy includes Eidoo app Operators.
- "**Personal Data**" includes any information relating to an identified or identifiable natural or legal person;
- "**Processing**" shall mean any operation or set of operations, whether or not by automatic means, which applies to (groups of) personal data, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, diffusion, communication by transmission, dissemination or any other form of disclosure, alignment or combination, restriction, erasure or destruction.
- The "**Navigation data**" are acquired by the computer systems and procedural software used to operate this site during their normal operation. This is personal data whose transmission is implicit in the use of Internet communication protocols. This category includes IP addresses, addresses in URI/URL (Uniform Resource Identifier/Locator) notation, the time of the request, the type of request, the size of the outgoing packet, the status of the response given by the server (received, error, etc.) and other parameters relating to the operating system.

### Data controller

Eidoo Tech LTD is a UK company with registration number 13872482 and its registered office address at 85 Great Portland Street, London, England, W1W 7LT and is the data controller for personal information collected in connection with provision of Eidoo app services.

### **Type of personal data acquired, purpose, legal basis and data retention**

The data are collected and managed for the purposes and within the times indicated below:

<b>Data</b>	<b>Mode of data acquisition</b>	<b>Purpose of the treatment</b>	<b>Legal basis of the treatment</b>	<b>Data retention time</b>
Technical data, such as e.g. device type, operating system, screen resolution, language, country, and web browser type	Automatic during the platform visit	Visit of the platform by the user	Predominant private interest	Until cancellation request
ETH Wallet address	Entered by the user or generated by the Company	Collecting token	Contract	Until cancellation request, however the user is aware that once recorded on the blockchain the data cannot be deleted
Session time	Automatic during the platform visit	Statistic purposes	Predominant private interest	Until cancellation request
E-mail	Entered by the user	Access to the platform and newsletter	Predominant private interest	Until cancellation request
Web page visit history (date and log)	Automatic during the platform visit	Statistic purposes	Predominant private interest	Until cancellation request
Personal data (name, address, date of birth, phone number, mail)	Entered by the user	Compliance with AML legislation	Law requirement	10 years

The platform is not designed to store "special categories", including race or ethnicity, religious or philosophical beliefs, life and sexual orientation, political opinions, trade union membership, health status information.

The platform also collects fully anonymous data about your behaviour without any possibility for us to trace back to your person.

### **Cookies and Other Identifiers**

We use cookies and similar tools to enhance your user experience, provide our services, and understand how customers use our services so we can make improvements. Depending on applicable laws in the region you are located in, the cookie banner on your browser will tell you how to accept or refuse cookies.

### **To whom will the data collected be communicated?**

We will only disclose your personal data if we are obliged to do so in order to comply with our legal or regulatory obligations, for business or administrative reasons or because you have asked us to do so. This probably also includes disclosure:

- within the Company;
- within the Group
- to third parties who process personal data on our behalf (IT system providers and other service providers); and in particular Eidoo Finance UAB, Lithuania(provider of the fiat to crypto exchange service) and EidooID OU , Estonia (provider of the Know Your Customer / Money Laundering solution)
- to any government, regulatory agency, enforcement or exchange body or court that so requires under applicable law or regulation.

### **Can the Company transfer data to a third country and/or international organisations?**

The data collected by the Company are stored in United Kingdom. Should we transfer your data outside the EU, we will ensure that in the first instance the data is stored in countries that guarantee adequate protection of personal data, such as member states of the European Economic Area. If this is not possible, we will ensure that the provisions of the applicable legislation on the transfer of personal data to third countries are complied with in all cases.

### **How we protect your personal data**

The security of your personal data is important to us and we use various technical and organisational measures to protect it.

We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of your personal information. Our security procedures mean that we may ask you to verify your identity to protect you against unauthorised access to your account password. We recommend using a unique password for your account that is not utilized for other online accounts and to sign off when you finish using a shared computer.

### **Rights of the interested parties**

Under the privacy regulations, users have a number of rights in relation to their personal data. They have the right to request access, correction or deletion of such information, the right to limit or oppose the processing, under certain circumstances, the right to data portability and lodge complaint to the relevant data protection authority.

If a user has given his or her consent to the processing of his or her data, he or she has the right (under certain circumstances) to revoke this consent at any time.

If you wish to exercise the above rights, please send an e-mail to [dpo@eidooofinance.com](mailto:dpo@eidooofinance.com).

We try to answer you within a maximum of one month, although we reserve the right to extend this period for more complex requests. We also reserve the

right to charge a reasonable administration fee for any manifestly unfounded or excessive requests for access to personal data and for any additional copies of personal data requested.