

The service Exchmatrix.com and its affiliates (hereinafter, the "Company", "we", "us" or "our") are committed to protecting and respecting your privacy.

This Privacy Policy (together with our Terms and Conditions) governs our collection, processing and use of your Personal Information. General Data Protection Regulation ((EU) 2016/679) ("GDPR") provides rules for how we can collect, use and disclose this information. Using the website <http://exchmatrix.com> ("Site") you are agreeing to be legally bound by this Privacy policy, so please read the following carefully to understand our views and practices regarding your Personal Information and how we will treat it. If any term in this Privacy Policy is unacceptable to you, please do not visit, access or use the Site.

We define "Personal Information" as information which identifies you personally.

The purpose of this Privacy Policy is to inform you of:

1. The types of Personal Information which we may collect about you and how it may be used.
2. Our use of information regarding IP Addresses and our use of cookies.
3. Any disclosure of Personal Information to third parties.
4. Your ability to correct, update and delete your Personal Information.
5. The security measures we have in place to prevent the loss, misuse, or alteration of Personal Information under our control.

#### Gathering and Use of Personal Information

We may collect your Personal Information if you use the Site, open an Account to use the Services or perform any Transactions on the Site. The types of Personal Information which we collect may include:

1. Your name.
2. Your photographic identification.
3. Your address.
4. Your phone number.
5. Your e-mail address.
6. Your banking details including account numbers.
7. Your Personal Information, including your passport and income information.
8. Your date of birth.
9. Your trades.
10. Other personal information, such as details of your interactions with us.

We may use your Personal Information for the following purposes:

1. To allow you to open and operate an Account on the Site.
2. To enable you to complete Transactions on the Site.
3. If you contact us, to reply to your queries.
4. To analyze use of our Site.
5. As required for regulatory purposes.
6. To provide you with information about products and promotions that may be of interest to you, from ourselves and third parties, although only if you have specifically agreed to receive such information.

7. For market research e.g. surveying our Members' needs and opinions on issues, such as our performance etc.
8. Verification and authentication of the Site Users' identity;
9. Prevention or detection of fraud and other criminal offences or abuse of the Site;
10. Creation of anonymous statistics with the help of Personal Information;
11. Tailoring of marketing communications to ensure that the most relevant information reaches Site Users.

When you verify as Individual or corporate customer at the Site, we will ask for your name, identification information, contacts, residential address. For more information, please see below:

#### Individual User:

- Full name, date of birth;
- Contact information, mailing address, e-mail address, phone number;
- Proof of identity (for ex. passport, driver's license or other government issued ID);
- Residence verification information (for ex. Utility bill or similar);
- Additional information for analysis of User activity within the framework of Anti Money Laundering (AML).

#### Corporate User:

- Full legal entity name;
- Legal documents (such as certificate of incorporation, memorandum and/or articles of association, documents confirming authorized person rights and ultimate beneficial owner rights);
- Verification information for legal entity related persons;
- Bank details;
- Additional information for analysis of User activity within the framework of Anti Money Laundering (AML).

We will process your Personal Information only for the purpose(s) for which it has been provided to us.

#### IP Addresses

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our Users' browsing actions and patterns and does not identify any individual.

#### Cookies

We use a browser feature known as a "cookie", which assigns a unique identification to your computer. Cookies are typically stored on your computer's hard drive. Information collected from cookies is used by us to evaluate the effectiveness of our Site, analyze trends, and administer the Site. The information collected from cookies allows us to determine such things as which parts of our Site are most visited and difficulties our visitors may experience in accessing our Site. With this knowledge, we can improve the quality of your experience on the Site by recognizing and delivering

more of the most desired features and information, as well as by resolving access difficulties. We also use cookies and/or a technology known as web bugs or clear gifs, which are typically stored in emails to help us confirm your receipt of, and response to, our emails and to provide you with a more personalized experience when using our Site.

We use third party service provider(s), to assist us in better understanding the use of our Site. Our service provider(s) will place cookies on the hard drive of your computer and will receive information that we select that will educate us on such things as how visitors navigate around our site, what products are browsed, and general Transaction information. Our service provider(s) analyses this information and provides us with aggregate reports. The information and analysis provided by our service provider(s) will be used to assist us in better understanding our visitors' interests in our Site and how to better serve those interests. The information collected by our service provider(s) may be linked to and combined with information that we collect about you while you are using the Site. Our service provider(s) is/are contractually restricted from using information they receive from our Site other than to assist us.

By using our Site you are agreeing that we may use cookies for the purposes set out above.

#### Disclosure of Personal Information

We use the Personal Information for the purposes indicated at the time you provide us with such information, and/or otherwise for the purposes set out in this Privacy Policy and/or as otherwise permitted by law. We may make available the Personal Information that you provide to us to our affiliates, agents, representatives, trusted service providers and contractors for these limited purposes. We may also share Members' Personal Information with financial institutions, insurance companies or other companies in the case of a merger, divestiture, or other corporate re-organization. We may also share Members' Personal Information with law enforcement or regulatory agencies, as may be required by law. Any third party which receives or has access to Personal Information shall be required by us to protect such Personal Information and to use it only to carry out the services they are performing for you or for the Company, unless otherwise required or permitted by law. We will ensure that any such third party is aware of our obligations under this Privacy Policy and we will enter into contracts with such third parties by which they are bound by terms no less protective of any Personal Information disclosed to them than the obligations we undertake to you under this Privacy Policy or which are imposed on us under applicable data protection laws.

We may share your Personal Information with law enforcement, data protection authorities, government officials, and other authorities when compelled by court order, or other legal procedure or the disclosure is necessary to report suspected illegal activity.

#### Correction/Updating/Deletion of Personal Information

You have certain rights with respect to your Personal Information according to GDPR as specified below and you can use them by contacting us at [support@exchmatrix.com](mailto:support@exchmatrix.com) :

1. Correction of the Personal Information. If you consider your Personal Information as incomplete or inaccurate, you can request the correction thereof;
2. Erasure of the Personal Information. You have the right to ask us to delete your Personal Information except in cases when it is restricted by respective regulations;

3. Restriction of the processing of the Personal Information. You have the right to suspend the processing of your Personal Information of any of its part;
4. Objection of the processing of the Personal Information. You have the right to object to the processing of your Personal Information which may be used, for example for direct marketing purposes;
5. Transfer of the Personal Information. You have the right to request to transfer your Personal Information to a new service provider or to another party;
6. Another rights granted to you by GDPR.

The rights specified hereinabove may be restricted in some cases, e.g. when the processing and storage of the Personal Information is subject to regulation of applicable legislation.

## Security

We have implemented security measures to ensure the confidentiality of your Personal Information and to protect your Personal Information from loss, misuse, alteration or destruction. Only authorized personnel of Company have access to your Personal Information, and these personnel are required to treat the information as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

## Retention of Personal Information

We will hold your Personal Information only for as long as it is necessary for us to do so, having regard to the purposes described in this Privacy Policy and our own legal and regulatory requirements. In accordance with our record keeping obligations we will retain Accounts and Personal Information for, at least a period of five years after they are closed by the User.

## Links

There may be links from our Site to other sites and resources provided by third parties. This Privacy Policy applies only to our Site. Accessing those third party sites or sources requires you to leave our Site. We do not control those third party sites or any of the content contained therein and you agree that we are in no way responsible or liable for any of those third party sites, including, without limitation, their content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or problems caused by, related to or arising from those sites. We encourage you to review all policies, rules, terms and regulations, including the privacy policies, of each site that you visit.

## Marketing

You have the right to ask us not to process your Personal Information for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Information. You can exercise the right at any time by contacting us at [support@exchmatrix.com](mailto:support@exchmatrix.com).

## Changes

Our Site policies, content, information, promotions, disclosures, disclaimers and features may be revised, modified, updated, and/or supplemented at any time and without prior notice at the sole and

absolute discretion of the Company. If we change this Privacy Policy, we will take steps to notify all Users by a notice on our Site and will post the amended Privacy Policy on the Site. It is the responsibility of the User to make sure that he is aware of the up-to-date Privacy policy and we advise you to check for the updates on a regular basis.

#### Contact Us

If you have any questions, comments, or concerns regarding our Privacy Policy and/or practices as it or they relate to the Site, please contact us at the following e-mail address:

E-Mail: [support@exchmatrix.com](mailto:support@exchmatrix.com)