

PRIVACY POLICY

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Hodltech OÜ ("Hodltech"), a licensed private limited company formed under the laws of Estonia, its respective direct and indirect subsidiaries and affiliates and any entities under common control with Hodltech (if any) (collectively, "we", "us" and "our") take data protection and security seriously. This Privacy Policy describes how we collect and process your personal data when you access content we own or operate on the website located at <http://hodltech.eu/> (the "Website") or any other websites, pages, features, content or applications we own or operate (collectively, the "Site") and/or when you use any of our APIs or third party applications relying on such APIs, and any of our products or services (referred to collectively hereinafter as our "Services").

Please read this Privacy Policy carefully and its entirety. If you have any questions about this Privacy Policy, please contact us at legal@hodltech.eu.

ACCEPTANCE OF PRIVACY POLICY

By accessing and using the Site or our Services, you agree that you have read, understood and accept all of the terms and conditions contained in this Privacy Policy. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of the Site and our Services.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to alter, amend or modify this Privacy Policy from time to time, in our sole discretion. We will provide you with notice of such changes by sending an e-mail, providing notice on the homepage of the Website and/or by posting the amended Privacy Policy via our Website and updating the "Last Updated" date at the top of this Privacy Policy. The amended Privacy Policy will be deemed effective immediately upon posting on the Website. Your continued use of the Site and/or our Services constitutes your agreement to be bound by any such changes to this Privacy Policy. If you do not agree with this Privacy Policy or any amendment to it, you should discontinue access and use of the Site and our Services.

DATA WE COLLECT

When you visit the Site, you may provide us with two types of information: personal information that you voluntarily disclose or that is collected on an individual basis; and information collected automatically when you use the Site or our Services including, without limitation, information that we obtain from our partners (collectively, the "Information").

We collect and process this Information for the purpose of providing Services and information about our Services to you and/or to comply with legal requirements. You may be asked to provide personal information anytime you are in contact with us. Any information you provide to us that is not required is voluntary. You are free to choose whether to provide us with the types of

personal information requested, but we may not be able to serve you as effectively or offer you all of our Services when you choose not to share certain information with us.

Personal Information

Personal information is data that can be used to identify you directly or indirectly, or to contact you. This Privacy Policy covers all personal information that you voluntarily submit to us and that we obtain from our partners. This Privacy Policy does not apply to anonymised data, as it cannot be used to identify you. Personal information means any information that is unique to you, such as your:

- full legal name, date of birth, age, nationality, gender, signature, utility bills, phone number, email address and home address;
- passport or other photo identification cards such as a driver's license or national identification card, other photographs like selfies;
- user ID, security questions, authentication data, transaction information, financial information, cryptocurrency or wallet addresses; and
- other personal information you choose to provide.

With your permission, we may also access other personal information on your device, such as your phone book, calendar or messages, in order to provide Services to you. If authorized by you, we may also access profile and other information from services like Facebook.

We may also collect and obtain information about you in order to comply with our legal obligations, such as anti-money laundering laws. We may obtain information about you from third party sources as required or permitted by applicable law, such as public databases, credit bureaus, ID verification partners, channel partners, joint marketing partners, and social media platforms. For example, we obtain information about you from public databases and ID verification partners for purposes of verifying your identity when you sign up for our Services or use our Services. Our ID verification partners use a combination of government records and publicly available information about you to verify your identity. Such information includes your name, address, job role, public employment profile, credit history, status on any sanction lists maintained by public authorities, and other relevant data. Pursuant to European Economic Area ("EEA") data protection law, our lawful basis for processing such data is compliance with our legal obligations. In some cases, we may process additional data about you to ensure our Services are not being used fraudulently or for other illicit activities.

By using our Services or providing us with your personal information, you also consent for us to collect, hold, use and disclose your personal information in accordance with this Privacy Policy. In addition to providing the foregoing information, if you choose to correspond further with us through e-mail or through the "contact" section of the Site or through events and public social networking platforms, we may retain, use and disclose the content of your messages together with your user ID or e-mail address and our responses.

Information that is Collected Automatically

When you use the Site or our Services, we automatically collect information from your devices. We collect the following information:

- **Server Log Information:** We collect server log information when you use the Site, which may include (but is not limited to) your login details, the date and time of visits, the pages viewed, your IP address, time spent at the Site and the websites you visit just before and just after our Website.
- **Device Information:** We collect information about the computer or mobile device you use to access the Site, including the hardware model, geo location/tracking details, browser fingerprint, operating system and version, the web browser and version you use, and other device identifiers.
- **Telemetry Information.** If you use any of our open source software, we may collect bandwidth download and upload speeds, the amount of free and used storage space on your device and other statistics about your device.
- **Usage Information.** If you use the Site, we will collect metadata about the files you upload for storage and information about the transactions you make on the Site or with our Services, such as the name of recipients, your name, digital asset amounts, click-stream data, instances in which you have used your private key to authenticate communications and/or the timestamp of transactions.
- **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various technologies to collect information when you interact with the Site, including cookies, web beacons and other unique device identifiers. Cookies are small data files that are stored on your device when you visit a website, which enable us to collect information about your device, IP address, web browsers used to access the Site, pages or features viewed, time spent on pages, mobile app performance and links clicked. Web beacons are graphic images that are placed on a website or in an email that is used to monitor the behaviour of the user visiting the website or sending the email. They are often used in combination with cookies.

HOW YOUR PERSONAL INFORMATION IS USED

The primary purpose for collecting your Information is to provide you with the best possible user experience and Services and to safeguard the security and stability of our systems. In general, we use Information to create, develop, operate, deliver, and improve our Services, content and marketing, to comply with our legal obligations, for anti-fraud purposes and for loss prevention. We may use your Information in the following ways:

- to provide, maintain, deliver or improve the Site or our Services;
- for quality control and staff training to ensure we can provide you with the best user experience and accurate information;
- to monitor and analyze trends, usage and activities in connection with the Site, to determine the usefulness or popularity of certain content and to better understand the online activity of users of the Site;

- to fulfil our legal or regulatory requirements;
- to enforce the terms and conditions of our User Agreement (<https://hodltech.eu/ua.pdf>) and other agreements we may have with you or third parties;
- to ensure network and information security including processing your Information in order to enhance security, monitor and verify identity or service access, combat spam or other malware or security risks and to comply with applicable security laws and regulations;
- to provide you with the information or products or services that you have requested;
- to provide you with customer service including, without limitation, answering your inquiry or responding to a communication from you;
- for research and development purposes including developing new products or services;
- to send you technical notices, support or administrative notifications;
- to facilitate marketing and to communicate with you about news, products, services, events and other information we think will be of interest to you;
- to detect, investigate and prevent fraudulent transactions or unauthorized or illegal activities;
- to protect our interests, rights and property and that of others;
- to facilitate corporate acquisitions, mergers, or transactions;
- to link, connect or combine Information we collect from or about you with other Information; and
- to carry out any other purpose or reason for which the Information was collected.

SHARING OF INFORMATION

We will never sell or rent your personal information. We will only share your Information in the following circumstances:

- with your consent or at your instruction;
- in connection with offers, products or Services provided on the Site;
- with our current or future parent companies, affiliates, subsidiaries and with other companies under common control or ownership with us or our offices internationally;

- with third parties or service providers that we have partnered with or perform work for us;
- certain information you may choose to share may be displayed publicly, such as your username and any content you post when you use interactive areas of the Site or our social media platforms like our online forums;
- in connection with a merger or sale of our assets, or if we do a financing or are involved in an acquisition or any other situation where Information may be disclosed or transferred as one of our business assets;
- in order to prevent fraud or other illegal or unauthorized activities;
- if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;
- with law enforcement officials, courts, or other third parties when we are compelled to do so by a subpoena, court order, or similar legal procedure, or when we believe in good faith that the disclosure of Information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement (<https://hodltech.eu/ua.pdf>) or any other applicable policies;
- if we believe your actions are inconsistent with our User Agreement (<https://hodltech.eu/ua.pdf>), our other agreements or policies, or to protect our legitimate interests, rights, property and safety or that of others; and
- with third parties where aggregate Information is disclosed which cannot be reasonably be used to identify you.

The data sharing may include transfers to companies or organizations in countries without an adequate standard of data protection. In these cases, we transfer personal data in accordance with applicable provisions on the international transfer of personal data, such as, where applicable, the respective provisions of the European Union General Data Protection Regulation (“GDPR”).

SOCIAL SHARING FEATURES

The Site may offer social sharing features, links to social media and other integrated tools. Your use of such features enables the sharing of information with your contacts or the public, depending on the settings you use with the entity that provides the social sharing feature or social media. Please visit the privacy policies of the entities that provide these features to obtain more information about the purpose and scope of data collection and the processing of such data by such entities.

HYPERLINKS AND THIRD-PARTY SITES

The Site may contain links to other third-party websites that may collect personal information about you, including through cookies or other technologies. If you link to another website, you will

leave the Site and this Privacy Policy will not apply to your use of and activity on those other websites. You should consult these other websites' privacy policies as we have no control over them and are not responsible for any information that is submitted to or collected by these third parties.

MARKETING AND ONLINE COMMUNICATION

We require your consent to send you marketing communications (for example: email marketing, exclusive offers, etc).

If you are a current customer residing in the EEA, we will only contact you by electronic means (email or SMS) with information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer and located in the EEA, we will contact you if you are located in the European Union by electronic means for marketing purposes only if you have consented to such communication.

If you do not want us to use your personal information for direct marketing purposes or to pass your personal information on to third parties for marketing purposes, if GDPR applies, you can withdraw your consent by contacting us at legal@hodltech.eu. Direct marketing includes any communications to you that are only based on advertising or promoting products and services.

As mentioned above, you can opt out of our marketing communications anytime. However, certain electronic communication between us and you is necessary for usage of our Services including login notifications, withdrawal confirmations, deposit notifications and 2-Factor Authentication (this can be replaced with Google Authenticator, Authy, or Trezor). We highly recommend that you do not turn off 2-Factor Authentication as this provides the maximum amount of security for your account.

If you chose not to consent to the terms of this Privacy Policy or opt out of receiving notifications from us that makes it difficult or impractical for us to provide Services to you, we will grant you a period of 10 business days from the moment you do not consent or opt out to move your assets into a separate digital wallet of your choosing and close your account.

PROTECTION OF PERSONAL INFORMATION

We take reasonable administrative, physical and electronic measures designed to safeguard and protect your personal information from unauthorized access or disclosure. This includes utilizing Secure Sockets Layer (SSL) software, which encrypts the personal information you input, and storing your personal information in encrypted form behind a firewall designed to block access from outside our network. However, no security or encryption method can be guaranteed to protect information from hackers or human error, no computer security system is entirely fool-proof and the Internet is not a secure method of transmitting information. As a result, we do not assume any responsibility for the data you submit to or receive from us through the Internet or for any unauthorized access or use of that information and we cannot and do not guarantee that personal information communicated by you to us or sent to you by us will be received or that it will not be altered before or after its transmission to us.

We cannot guarantee that loss, misuse, unauthorized acquisition, or alteration of your Information will not occur. Please recognize that you play a vital role in protecting your own Information. When registering on the Site or accessing or using our Services, you should choose a password of

sufficient length and complexity, not reveal this password to any third parties, and to immediately notify us if you become aware of any unauthorized access to or use of your account.

Furthermore, we cannot ensure or warrant the security or confidentiality of Information you transmit to us or receive from us by Internet or wireless connection, including email, phone, or SMS, since we have no way of protecting that Information once it leaves and until it reaches us. If you have reason to believe that your data is no longer secure, please contact us at legal@hodltech.eu.

RETENTION PERIOD OF DATA

Information we collect may be stored or processed on computers located in any country where we do business. We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting obligations or to resolve disputes. This is a case-by-case determination that depends on things such as the nature of the data, why it is collected and processed, and relevant legal or operational retention needs. For example, we may retain certain information for accounting and security purposes even after our business relationship with you has ceased.

RIGHTS YOU HAVE WITH RESPECT TO YOUR PERSONAL INFORMATION

You have certain individual rights regarding the personal information that we collect and process about you through the Site.

Most web browsers are set to accept cookies as a default. You may wish to opt out by turning off cookies (please refer to the help menu on your browser); however, switching off cookies may restrict your use of the Site.

You may also opt out of receiving promotional communications from us at any time by following the instructions in those communications. If you opt out, we may still send you non-promotional communications, such as technical notices, support or administrative notifications or information about your account (if you have one).

You have the right to:

- access or receive certain data about the personal information we process about you;
- have your personal information rectified;
- object to the processing of your personal information or ask us to restrict processing or delete your personal information;
- withdraw your consent to our processing of your personal information; and
- not be subject to a decision based solely on automated processing of your personal information, including profiling, which produces legal or similarly significant effects on you, save for the exceptions applicable under relevant data protection laws.

If the GDPR applies and we process your personal information to perform a contract with you or based on your consent, you also have the right to receive a copy of your personal information in a structured, commonly used and machine-readable format for the purpose of transferring such information to a third party. This information will be provided subject to some fee associated with gathering of the information (as permitted by law), unless such provision adversely affects the rights and freedoms of others.

Please note, however, that your rights are subject to exceptions or derogations. Specifically, we may need to further process and retain your Information to perform a contract with you or your company or organization, to protect our legitimate interests (such as the establishment, exercise or defense of legal claims) or to comply with legal requirements. To the extent permitted by law, namely to protect the rights and freedoms of others or to protect our own legitimate interests, we may therefore refuse to satisfy your request or we may satisfy your request only restrictedly.

Lastly, you have a right to lodge a complaint with a competent supervisory authority.

CHILDREN'S PERSONAL INFORMATION

We do not knowingly collect personal information from any person under the age of 18. If a user submitting personal information is suspected of being younger than 18 years of age, we will require the user to close his or her account and will not allow the user to continue to use our Services. We will also take steps to delete the Information as soon as possible. Please notify us if you or anyone you know is under the age of 18 and are using our Services so we can take action to prevent access to our Services.

COMPLAINTS

You have the right to complain about our processing of your personal information to the relevant data protection authority. You can complain in the European Union member state where you reside or work, or in the place where the alleged breach of data protection law has taken place.

HOW TO CONTACT US

If you have questions or concerns regarding this Privacy Policy or if you have a complaint, please contact us at legal@hodltech.eu.