

## **BitcoiNote Express Exchange**

### **PRIVACY POLICY**

**November 2018**

BTCN and its affiliates (hereinafter “BTCN”, “we”, “us” or “our”) undertakes to take maximum efforts in order to protect your privacy. BTCN uses the collected information about you to fulfill its contractual obligations and improve the customer service.

This policy together with the User Agreement and other documents referred to it defines the principles and rules on the basis of which we collect, process and use your personal data.

The data controller is BTCN and any questions relating this policy should be directed to BTCN, address.

### **WHAT WE COLLECT ABOUT YOU**

We may collect and process the following data about you:

Information you give to us.

You can provide us with information about yourself by filling in the relevant forms on the website or by providing us such information by phone, email, during a video conference or in any other manner. This information includes personal data which was specified when registering on the website, when subscribing to our service, opening an account and verifying the identity of the account holder or persons authorized to use it, as well as the payment instruments used by a person, when searching for a product, using any of services provided by our website, while placing orders on our website, by participating in discussions or using any other communication functions on our website, during participation in draws, promotions or surveys, and also when you tell us about problems or issues in the work of the website. For example, the data that you provide us, can include your last name and first name, your photos; your videos, your address; your nationality, your tax residency, your phone number; your e-mail address; your logins and nicknames, your bank details, including account numbers and payment details; your date of birth; your education; your experience and place of work, your sources of income and their amount; information on the status of your accounts opened with banks or payment systems.

### **INFORMATION WE COLLECT ABOUT YOU**

With regard to each of your visits to our website and use our services we can collect, for example, the following information about you (including automatically):

- A. technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- B. information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;
- C. information about geo-location. We may collect information about real-time location based information from your device at any time while you download or use our services. We may use this information to optimize your experience.
- D. financial data and information on the use of services and facilities provided by our website, including information on implemented transactions and parties thereto, including on margin

transactions, information on the status and (crypto) currency of accounts and cash flow on them, accrued commissions, information on crediting and withdrawal of funds from our accounts.

E. Information we receive from other sources.

We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## **USE OF COOKIES**

Cookies are typically stored on your computer's hard drive, which assigns a unique identification to your computer. We also may use cookies stored in emails to help us confirm your receipt of, and response to. We also may use service provider(s) who will place cookies on the hard drive of your computer and will receive information that we select that will give us information about the way our users and visitors navigate on our site, what products are browsed, and general transaction information.

Information collected from cookies is used by us to evaluate the effectiveness of our site, analyse trends, see what difficulties our visitors may experience in accessing our site, and administer the platform. We need this information to improve the quality of our service.

We may also place cookies on Your device while You access the Website. Cookies collect User information including Website usage, visits to the Website and other User generated information. Cookies allow Users to navigate from page to page without having to re-login each time, count visits, and see which areas and features of the Website are popular.

Any sensitive information in these cookies are encoded so that only BTCN can interpret the information stored on them.

The cookies are placed for the following purposes:

- Recognize You as a BTCN User,
- Collect information about Your computer to mitigate risk and help prevent fraud,
- Customize Your experience, content, and advertising, and
- Measure promotional effectiveness.

You are agreeing that we may use browser feature known as a "cookie" for the purposes set above.

## **WHY WE USE YOUR PERSONAL DATA**

We are going to use your personal data for the following purposes:

1. to fulfill the obligations provided by any contracts concluded with you, as well as to provide you with the information, products and services that you requested;
2. to verify and check the identity of users who open and operate accounts in order to prevent fraud, deception and other illegal activities;
3. to comply with legal requirements for the legalization (laundering) of proceeds from crime, financing of terrorism and financing the proliferation of weapons of mass destruction;
4. to notify you of other our products and services, similar to those products or services that you already purchased or information that you searched for;

5. to provide you by us or by third parties appointed by us with information about products or services that you, in our opinion, might be interested in. If you are already our customer, we will contact you via electronic means of communication (via e-mail or SMS) to inform you about products or services similar to those that were in a previous sale or negotiations to sell them to you. If you are a new customer and since we allow certain third parties to use your data, we (or they) will contact you only by electronic means and only upon your consent. If you do not want us to use your data in this way or transfer it to third parties for marketing purposes, please tick the appropriate box on the form in which we collect your data;
6. to notify you about changes related to our services;
7. to ensure the most effective presentation of the content of our website to you and use it from your computer;
8. for administration of our website and for internal operations, including troubleshooting, data analysis, testing, statistical data collection and for conducting surveys;
9. to improve our website and to make sure that our content is most convenient for the operating system of your computer;
10. to give you access to the interactive features of the website in case you wish to use them;
11. to ensure the security of our website, our services, and your accounts;
12. to evaluate and understand the effectiveness of promotional materials that we provide to you and other users, as well as to provide you with the necessary advertising information;
13. to support, respond and resolve your complaints and issues related to use of our services and the capabilities of our website.

### **DISCLOSURE OF YOUR PERSONAL DATA**

We may share your personal information with any member group, which means our subsidiaries, our ultimate holding company and subsidiaries.

We may share your information with selected third parties including:

1. business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
2. advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 females aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
3. We may also disclose your personal data to third parties in the following cases:
  - A. if we sell or buy any business or assets. Personal data of users may be disclosed to a potential buyer or seller;
  - B. if BTCN or all of its assets are purchased by a third party, personal data of users will be transferred as one of the assets;
  - C. if we are required to disclose or transfer personal data of the user in accordance with any applicable laws or within the implementation of decisions of the relevant courts, or we are compelled to force users to comply with the terms and conditions of the agreements concluded with us; in case it is necessary to protect own rights, own property, to guarantee the safety of BTCN, our users or others. This includes the exchange of information with companies and organizations to prevent fraud and reduce the likelihood of default by borrowers in conducting margin transactions.

### **SECURITY AND STORAGE OF PERSONAL DATA**

We have implemented security measures to ensure the confidentiality of your personal data and to protect you from loss, misuse, alteration or destruction. Only authorized personnel of BTCN have access to your personal data, 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.

The information we receive from you can be transferred and stored outside the European Economic Area (EEA). The information about you can be processed by our employees or employees of service providers outside the EEA. When storing or otherwise processing information by such third parties outside the EEA, we guarantee that we will notify such third parties of our obligations under this Privacy Policy and will enter with them into relations that will impose obligations for them regarding your personal data, which are at least have level of protection as specified in this Privacy Policy. Such employees, among other things, can process your requests, payment details and provide technical support. By giving us your personal data, you consent to the transfer, storage and processing of your personal data. In its turn, we will take all necessary measures to ensure that your personal data is processed in compliance with the security rules and in accordance with the provisions of this Privacy Policy.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## **BASIS FOR PERSONAL DATA PROCESSING**

We collect and process your personal data only when we have a legitimate reason for such processing. Legal grounds include consent (in cases where you provide it), a contract (in cases where processing is necessary to fulfill the terms and conditions of contracts between you and BTCN), compliance with a legal obligations (in cases where BTCN is required to request / receive and process as well as to store your personal data in order to comply with the requirements of applicable laws, for example the laws related to legalization (laundering) of proceeds of crime, financing of terrorism and financing the proliferation of weapons of mass destruction) and legitimate interest (for example, when processing is necessary to protect you or us from certain threats (fraud, security, etc.), compliance with the provisions of applicable laws, the proper level of conduct of our business (the quality of the services provided, identification of needs, preparation of reports), conclusion and implementation of corporate transactions (sale of participant interests / shares, mergers, acquisitions), etc.).

In cases where the basis for data processing is the consent, you have the right to withdraw it at any time.

## **YOUR RIGHTS**

By contacting us you can use the following rights:

1. the right to delete your data (all or part thereof);
2. the right to change or correct your data, in particular when it is incorrectly stated;
3. the right to object or restrict processing of your data;
4. the right to access to your data and / or a copy of your data, which you provided to BTCN, in a machine-readable format.

Also, you have the right to prohibit the use of your personal data for marketing purposes. Before requesting your personal information, we usually inform you that we are going to use your data or

disclose it to third parties for promotional purposes. You can use the right to prohibit the processing of your personal data for promotional purposes by putting a tick in the relevant field in the questionnaire. You can also exercise this right by contacting us at any time.

Please note that the implementation of some of your rights, depending on the situation, may limit, complicate or completely exclude the possibility of further cooperation.

Our website can contain active links from / to the websites of partner organizations, advertisers and affiliated companies. If you are following an active link, please note that other websites have their own privacy policies, and we are not responsible for the provisions of these policies. Please review the privacy policies of these sites before sharing your personal information with them.

### **RETENTION OF PERSONAL DATA**

We will hold your personal data 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 data for, at least a period of five years after they are closed by you.

We may access your personal data or retain it for a longer period if it will be subject to an official request or legal obligation, an investigation by the government or an investigation into possible violations of our terms and conditions, or in other cases to prevent possible harm based on our reasonable considerations.

### **CHANGES TO THIS PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Updated: 11.11.2018