

# Privacy Policy

## Collection and processing of e-mails

Electrocoin Ltd will use users' e-mail for communication purposes with users regarding: login, registration, transactions, orders, safety requirements, notifications about safety measures, reminders about the status of orders, transactions, user profile level, and other necessary communication with users.

## Collection and processing of mobile numbers

For the purposes of KYC/AML procedures and verification of credibility of the User account, Electrocoin Ltd shall communicate with the Users via the telephone using the mobile numbers given in the User's accounts.

## Cookies

Electrocoin Ltd may collect, record and analyze information of Visitors to its website. We use cookies and other technologies (collectively, "cookies") to provide us with data we can use to improve users' experience, performance and future development of the service. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site. We will never share this information with any third party. Cookies are readable only by us and do not contain any personal information nor do they contain account or password information. We cannot and will not gather information about other sites you may have visited. By continuing to visit this website, you agree to the placement of cookies on your device.

## Protection of data

We use a variety of security measures to ensure the confidentiality, integrity, availability and privacy of your Personal Information and to protect your Personal Information from loss, theft, unauthorized access, misuse, alteration or destruction.

Our company has implemented the following measures to protect your personal data:

Encryption of sensitive data during transfer and at rest;

2-factor authentication;

Logging of activities performed in the platform;

Access controls and other measures to mitigate risks identified during the risk assessment process;

All data processing systems operate in complete confidentiality;

Password protected directories and databases;

All data can be restored in case of technical difficulties;

In case of loss or damage to your personal data, the company will restore it from a backup copy, if this is not possible – the company will definitely inform you about this within 48 hours.

Only authorized Electrocoin Ltd personnel are permitted access to your Personal Information, and this personnel is required to treat the information as highly confidential.

If, in order to provide you with the required service, it becomes necessary to transfer your data to third parties, we will definitely require them to have the same level of organizational and technical security of your data, which is confirmed by contractual obligations.

Vulnerability Scanning to actively protect our servers from hackers and other vulnerabilities.

The Company saves all documents up to date and under the adopted rules of the General Data Protection Regulation.

The security measures will be reviewed regularly in light of new and relevant legal and technical developments.

#### Disclosure to third parties

Your information will not be shared with any third parties without your consent, except to provide Electrocoin Ltd Services or as required by law. By using our Services and accepting our Terms of Service, you consent to the disclosure of your Personal Information as described in this Privacy Policy.

In processing your transactions, we may share some of your Personal Information with third party service providers, banks, systems for payments and transfers.

Due to legislation, we may share your personal data with police and other government agencies.

Also, we may share your personal information to Services to verify and verify your identity that comply with verification norms and standards Courts.

If you use the card as a means of payment, we, as a service providing currency exchange services, will not operate (provide, sell, buy, exchange) your data (as a cardholder) or anyone else with anyone other than the enquirer (Visa / Mastercard / and etc.) or government agencies, if required by law.

Your information may be transferred to third parties solely for processing your transaction and this will be only that part of the information that is necessary for this at the request of the system or law. In any case, the third party who receives your data will protect it and keep it in accordance with the law.

#### General Data Protection Regulation (GDPR) policy

Electrocoin Ltd protects and processes personal data in accordance with privacy rights and regulations set forth in, but not limited to:

Regulation (EU) 2016/679 of the European Parliament and of the Council of the European Union of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation (GDPR).

bRegulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and the implementations of the Directive in local legislation.

Data Protection Act 1998.

Privacy and Electronic Communication (EC Directive) Regulations 2003 (SI2003/2426).

By using the Service from the Electrocoin Ltd, you as the User, have agreed to privacy policy of the Company.

Due to our GDPR policy, Electrocoin Ltd shall collect, store and process personal data strictly in accordance with our policies and instructions in accordance with GDPR. All information is stored securely and is accessed by authorized personnel only.

#### User's rights over their personal data

Due to our GDPR policy, you can request access to personal information by contacting the employee responsible for the privacy policy or sending request e-mail to [support@Electrocoin Ltd.io](mailto:support@Electrocoin Ltd.io). You will

receive the answer within one month from receiving your request by Electrocoin Ltd. If we are unable to process your request or this is not provided for by legal regulations, we will definitely inform you about this with information about the reasons for the refusal.

#### Other information

We may receive your personal information even if we do not take any action to do so – this is called “unsolicited” personal information. In such situations, we destroy all such information if it does not coincide with the purpose of collecting the necessary information. Also, we can save such data if it matches the requested data. The conditions for storing such information are similar to the information you provide.

#### Updates of the privacy policy

This Privacy Policy may be revised, modified, updated and/or supplemented at any time, without prior notice, at the sole discretion of Electrocoin Ltd.

#### Privacy Policy

Electrocoin Ltd (a trading name of UAB Zirgenva) is platform that provides a virtual currency services. This privacy policy explains how Electrocoin Ltd processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through the use of its website and platform.

Electrocoin Ltd implements and maintains appropriate technical, security and organizational measures to protect Personal Data against unauthorized or unlawful processing and use, and against accidental loss, destruction, damage, theft or disclosure.

This policy applies where we are acting as a Data Controller with respect to the personal data of our website visitors and service users.

If you do not agree with the Terms set out herein, we ask you to not visit this website [www.ElectrocoinLtd.io](http://www.ElectrocoinLtd.io). In cases when required by the applicable law, we will ask for your explicit consent to process Personal Data, which shall be collected on this website or volunteered by you. Kindly note that any consent will be entirely voluntary. However, if you do not grant the requested consent to the processing of your Personal Data, the use of this website may not be possible or may be limited.

Electrocoin Ltd will process your account data you provide when you open Electrocoin Ltd account, perform transactions on the Electrocoin Ltd platform, or use other Electrocoin Ltd Services.

#### Collection of Personal data

Electrocoin Ltd collects and processes Personal Data for the purposes of the necessary KYC/AML procedures to ensure compliance with the relevant AML legislation.

Users of Electrocoin Ltd Services can at any time access and edit, update or delete their contact details by logging in with their username and password to Electrocoin Ltd platform.

Electrocoin Ltd will not retain User data longer than is necessary to fulfill the purposes for which it was collected or as required by the applicable laws and regulations.

During a User's registration and operation with Electrocoin Ltd exchange platform, Users provide such personal data:

contact details and information (name, surname, phone number, e-mail etc.);

general information – age, gender, etc.;

date of birth;

address;

profession;

payment details;

documents confirming your identity, full name and address of residence;

information about account connection data – geolocation, IP address and device information;

provided information via mail or other communication channels;

transaction information;

biometric information (only to verify your identity);

additional documents for verification.

For the purposes of KYC/AML procedures and prevention of fraud, we can ask Users to provide additional documents for verification to confirm the legal source of User's income.

The above mentioned Personal Information will be used for operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with Users.

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