

PRIVACY POLICY

Our Privacy Policy was last updated on January 12, 2023.

We take your privacy seriously. This Privacy Policy explains how we collect, use, and protect the personal information you provide to us when you use <https://vivexcoin.io/> and our services.

By using our website and services, you agree to the collection and use of information in accordance with this Privacy Policy.

LEGAL INFORMATION

DATA CONTROLLER:

VIVEXCOIN SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ (LLC),

registration number 0001006127

registered address at 53/57 Chadakowska street, office 22A, Warsaw, 03-816, Poland

registration number in the Register of Virtual Currencies - RDWW-565

CONTACT

Email: general@vivexcoin.io

DEFINITIONS

“**GDPR**” means the General Data Protection Regulation. It refers to the Regulation (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 repealing Directive 95/46/EC.

“**Data Controller**” determines the purposes and means by which personal data is processed.

“**Data Subject**” is an identified or identifiable natural person. An identified or identifiable natural person is someone who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Personal Information**” means any information that can be used to identify an individual, including but not limited to name, email address, phone number, and financial information.

“**Service**” means any service offered by Company.

“**Website**” means the website owned and operated by Company, located at <https://vivexcoin.io/>.

“**Third-Party Service Provider**” means any company or organization that provides services on behalf of Company.

“**Company**” refers to VIVEXCOIN SPÓŁKA Z OGRANICZONĄ ODPOWIEDZIALNOŚCIĄ.

“**We,**” “**us,**” and “**our**” refer to Company.

“**You**” and “**your**” refer to the user of our Website or Services.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices or to comply with legal requirements. We will notify you of any material changes to this Privacy Policy by posting the updated policy on our Website.

COLLECTION OF INFORMATION

We use the following data collection methods:

Direct collection: This method involves collecting personal information directly from the individual through forms, surveys, or other means.

We collect such personal information as your name, ID, contact and financial data when you:

- Register and use your account on our Platform;
- Directly contact us.

Indirect collection: This method involves collecting personal information through observing the individual's behavior, such as through cookies or tracking software on a website. It refers to the process of collecting personal data using technology without human intervention.

We may collect such data user's browsing behavior, preferences, login information, device information, and browser settings.

Collection through third-parties: This method involves collecting personal information from a third party, such as a social media platform.

We may receive certain personal information from software that is used to track and analyze website traffic, such as Google Analytics. We may also receive personal information via KYC services providers.

USE OF PERSONAL INFORMATION

We will only collect and use your personal data on a legal basis:

- **Contractual Necessity:** Personal information can be collected and used if it is necessary to perform a contract with the User. For example, if a User places an order online, we will need to collect and use their personal information to process the order.
- **Legal Obligation:** Personal information can be collected and used if it is necessary to comply with a legal obligation. For example, we may be required to collect and use personal information to comply with tax laws or to prevent fraud.
- **Legitimate Interest:** Personal information can be collected and used if it is necessary to pursue the legitimate interests of the company or a third party, as long as these interests are not overridden by the individual's rights and interests. Contact us for further information on how we weigh our legitimate interests against any potential impact on you in relation to certain activity.
- **Consent:** We may also collect your personal information when you have provided us with your consent to do so. We rely on your consent for our marketing and advertising activities.

PURPOSES OF USING PERSONAL INFORMATION:

We will only use your personal information for the purposes for which it was collected, unless we reasonably believe that we need to use it for another reason that is compatible with the original purpose. Please contact us if you want to know how the processing for the new

purpose is compatible with the original purpose.

Please see the table below to understand the purposes and legal basis of information collection.

Type of information:	Legal basis:	Purpose:
<ul style="list-style-type: none"> a) Full name, date of birth b) ID documents c) Email, telephone d) UB or bank statement e) Card information 	<ul style="list-style-type: none"> a) Contractual Necessity b) Legal Obligation 	To register an account for you and perform an order.
<ul style="list-style-type: none"> a) Full name, date of birth b) ID documents c) Email, telephone d) UB or bank statement e) Card information f) Financial information such as source of funds g) Usage behaviour h) Technical information 	<ul style="list-style-type: none"> a) Legal Obligation 	To monitor suspicious transactions and to perform ongoing due diligence.
<ul style="list-style-type: none"> a) Name b) Email address c) Phone number 	<ul style="list-style-type: none"> a) Legitimate Interest 	<p>To provide customer services.</p> <p>To contact customers about their orders, answer their questions, and resolve any issues they may have.</p>
<ul style="list-style-type: none"> a) Name b) Email address c) Phone number d) Usage behavior 	<ul style="list-style-type: none"> a) Legitimate Interest b) Consent if applicable 	To improve our marketing strategies and to develop targeted advertising. In this case, we may collect personal information such as browsing history, search queries, and demographics through cookies, web beacons, or other tracking technologies.
<ul style="list-style-type: none"> a) Name b) Email address c) Phone number d) Usage behavior 	<ul style="list-style-type: none"> a) Legitimate Interest 	<p>To develop products and services.</p> <p>Personal information can be collected to better understand customer needs and preferences, which can help to improve products</p>

		and services.
a) Full name, date of birth b) ID documents c) Email, telephone d) UB or bank statement e) Card information f) Financial information such as source of funds g) Usage behaviour h) Technical information	a) Legitimate Interest b) Legal Obligation	To prevent fraud and unauthorized transactions.
a) Technical information	a) Legitimate Interest	To prevent cyber-attacks, to administer our website.

Marketing and opting out

We may also use your contact information, such as your email address or phone number, to send you promotional offers and other marketing materials. If you prefer not to receive these communications, you can opt out by following the unsubscribe instructions included in each email or by contacting us.

INFORMATION DISCLOSURE

We may share your personal information with third-party service providers for the purpose of providing services to us, such as KYC service providers, website hosting, data analysis, payment processing, and customer service. These third-party service providers are contractually obligated to keep your personal information confidential and to use it only for the purpose of providing services to us.

We may also share your personal information with third parties in the following circumstances:

- To comply with legal obligations, such as a court order.
- To protect the rights, property, or safety of our company, our customers, or others.
- To enforce our terms of service or other agreements.
- In the event of a merger, acquisition, or sale of all or a portion of our assets.

We will not sell or rent your personal information to third parties for marketing purposes without your explicit consent. We always have a contract in place with the third parties to ensure that the data is protected and used only for the specific purposes for which it was shared and to inform the Client about the disclosure.

Transferring personal information outside the European Economic Area (EEA) can raise data protection concerns, as the data protection laws in other countries may not be as strong as those within the EEA. In order to ensure that personal information is adequately protected when transferred outside the EEA, we may use a variety of legal mechanisms, such as:

- a) Standard Contractual Clauses: These are pre-approved clauses that can be included in contracts between the data controller (the company collecting the personal

information) and the data processor (the third party to whom the personal information is being transferred) to ensure that the personal information is adequately protected.

- b) We will only transfer personal information outside the EEA if the data protection level in the country of the recipient of the data is equivalent to the EU.

DATA SECURITY

We take the security of your personal information very seriously and have implemented a number of technical and organizational measures to protect it. These measures include:

- a) Encryption of personal information in transit and at rest.
- b) Firewall and intrusion detection/prevention systems to protect against unauthorized access to our network.
- c) Regular monitoring of our systems and network for security vulnerabilities.
- d) Regular backups of personal information to protect against data loss.
- e) Access controls and authentication mechanisms to ensure that only authorized personnel can access personal information.
- f) Regular security awareness training for our employees to ensure that they understand and follow best practices for protecting personal information.

While we take every reasonable precaution to protect your personal information, no security measures can be completely effective. Therefore, we cannot guarantee the complete security of your personal information.

DATA RETENTION

We retain your personal information for as long as necessary to fulfill the purpose for which it was collected, or as required by applicable laws. After this time, we will either delete or anonymize your personal information.

We retain personal information for the following periods of time:

- Personal information used for the performance of a contract or to take steps at the request of the data subject prior to entering into a contract: retained for the duration of the contract, plus 5 years after termination of it.
- Personal information used for direct marketing: retained until the individual opts out of receiving marketing communications.
- Personal information used for website analytics: retained for a period of 12 months.

We may retain certain personal information for longer periods of time if it is necessary for us to do so to comply with legal or regulatory obligations, or to protect our legal rights and interests.

EXERCISE OF RIGHTS

As a data subject, you have the following rights under GDPR:

- a) The right to be informed: Data subjects have the right to be informed about the collection and use of their personal data, including the purposes for which it is used, the legal basis for processing it, and who it will be shared with.
- b) The right of access: Data subjects have the right to access their personal data and to receive a copy of it.
- c) The right to rectification: Data subjects have the right to have their personal data rectified if it is inaccurate or incomplete.

- d) The right to erasure: Data subjects have the right to request the deletion or removal of their personal data in certain circumstances, such as when it is no longer necessary for the purpose for which it was collected.
- e) The right to restrict processing: Data subjects have the right to request that their personal data is only processed for certain purposes, or not processed at all.
- f) The right to data portability: Data subjects have the right to receive their personal data in a structured, commonly used and machine-readable format and to transmit it to another controller.
- g) The right to object: Data subjects have the right to object to the processing of their personal data, including for the purpose of direct marketing.
- h) The right to not be subject to automated decision-making: Data subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

If you want to exercise any of the rights set out above, please contact us at general@vivexcoin.io.

COOKIES POLICY

A cookie is a small text file that is stored on a user's device by a website when the user visits the website. The cookie contains information about the user's browsing behavior, preferences, and login information. This information can then be used by the website to personalize the user's experience, such as by remembering their login information or displaying personalized ads.

Cookies can be either "session cookies" or "persistent cookies". Session cookies are temporary cookies that are deleted from the user's device when the user closes their browser. Persistent cookies, on the other hand, remain on the user's device until they expire or are deleted by the user.

By domain, there are first-party and third-party cookies. First-party cookies are set by the domain pertaining to our Platform. Third-party cookies are stored by a different domain to the Platform's domain.

There are also several categories of cookies such as strictly necessary cookies, functional cookies, analytical/performance cookies, targeting cookies. Strictly necessary cookies - these cookies are essential for the operation of the Website and for you to use its features. Functional cookies – these cookies enable the Website to provide enhanced functionality and personalisation. If you do not allow these cookies then some or all of these services may not function properly. Analytical cookies - these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. Targeting cookies - these cookies are used to deliver personalized adverts.

We use cookies for the following purposes:

- a) Authentication: Cookies can be used to store login information, so that Users don't have to enter their credentials every time they visit a website.
- b) Personalization: Cookies can be used to store information about a User's preferences, such as their language or location, so that a website can display content that is more relevant to the user.
- c) Analytics: Cookies can be used to track how Users interact with a website, such as which pages they visit and how long they stay on the website. This information can be used to improve the user experience and to understand user behavior.

- d) Advertising: Cookies can be used to display targeted ads to Users based on their browsing history, search queries and demographics.

We use the following cookies:

Type	Duration	Purpose of Use
_ga	2 years	This Google Analytics cookie is used to uniquely identify users.
_utma	2 years	This Google Analytics cookie keeps track of the number of times a visitor has been to the website pertaining to the cookie, when their first visit was, and when their last visit occurred.
_utmz	6 months	This Google Analytics cookie is used for tracking source visits (ie where the user came from such as a search engine result, or direct link).
vivexcoin_session	session	Session cookies allow to remember users within the website when they move between web pages.
XSRF-TOKEN	session	These cookies ensure the proper functionality and security of the website.

Managing cookies

You can control the use of cookies on your device by adjusting your browser settings. Most browsers allow you to block or delete cookies, or to receive a warning before a cookie is stored. However, please note that disabling cookies may limit your ability to use certain features of our Website.

The following links will take you to information about managing cookies:

Chrome: <https://support.google.com/chrome/answer/95647>

Opera: <https://help.opera.com/en/latest/security-and-privacy/>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

Safari: <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Edge: <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>

COMMUNICATION WITH US

If you have any questions or concerns about this Privacy Policy or the way in which we handle your personal data, please contact us at general@vivexcoin.io.

You will not be charged a fee to access your personal information (or to exercise any of the other rights).

If your request is clearly unfounded, repetitive, or excessive, we may refuse to comply with your request.

We may need to ask you for specific information to confirm your identity and ensure your right to exercise any of your other rights. This is a security measure to ensure that personal information is not disclosed to anyone who does not have the right to receive it.

We will do our best to handle your request within one month.

If you are not satisfied with the way in which we handle your personal data, you have the right to make a complaint to the relevant supervisory authority. In Poland, the supervisory authority is the President of the Office for Personal Data Protection (UODO).