Privacy Policy BuyCrypt *This Privacy Policy has been updated on 22 March , 2021*

Introductions

BuyCrypt - (hereinafter - "we", "us", "Platform") is the Delaware company, which has a multiterminal for cryptocurrency trading. The User has the ability to connect accounts from different exchanges using API keys and trade from one place, in a more convenient interface.

Definitions in this Privacy Policy will have the same meaning which are given to those words in the General Terms and Conditions. If a term of this Privacy conflicts with or differs from a term in the General Terms and Conditions, this Privacy will apply.

For the purposes of this Policy, we define the term "User" as a person who visits our website (https://buycrypt.com/) and registering an account at the site and uses the services of BuyCrypt.

Our registered office is at 8 The Green, STE Al Dover, DE 19901, USA

We at BuyCrypt have created a Privacy Policy that aims to help you understand what data we collect, what we use it for and how you can exercise your rights. Reading Privacy Policy is important so we hope you will give it time and attention. By opening an account on Buy Crypt, you understand that you will be providing us with personal information that we will use to open, administer and maintain your account with us.

For us the privacy and security of our Users are of paramount importance. We are committed to protecting the data you share with us. This privacy policy explains how we process information that can be used to directly or indirectly identify an individual ("Personal Data") collected through use of our website and User's websites.

Also our site does not sell your personal information to third parties. A "sale" of Personal Information under the **CCPA** is defined broadly to include the "selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means" the Personal Information of a User to another business or third party "for monetary or other valuable consideration." If we decide to sell our website or App(s) (our business), we will inform you about this, so you can forbid us to transfer your personal data together with our business. If so, we will delete your data from the databases prior to a business transfer.

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

1. who is BuyCrypt and how you may contact us;

2. the kinds of Data which we may collect about you, the reasons for collecting this information, how it may be used and for how long we will keep it;

3. disclosure of Personal Information to third parties;

4. User's ability to access, correct, update, restrict use, ask us to transfer and/or delete its Data;

5. the extent of automated decision-making or profiling that we carry out using User's Data;

6. the security measures we have in place to prevent the loss, misuse, or alteration of Data under our control, and

7. User's rights to lodge a complaint.

We adhere to the following principles in order to protect your privacy:

• principle of purposefulness - we process personal data fairly and in a transparent manner only for the achievement of determined and lawful objectives, and they shall not be processed in a manner not conforming to the objectives of data processing;

• principle of minimalism - we collect personal data only to the extent necessary for the achievement of determined purposes and do not keep personal data if it is no longer needed;

• principle of restricted use - we use personal data for other purposes only with the consent of the data subject or with the permission of a competent authority;

• principle of data quality - we update personal data shall be up-to-date, complete and necessary for the achievement of the purpose of data processing;

• principle of security - security measures shall be applied in order to protect personal data from unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical and organisational measures;

• principle of individual participation - the persons shall be notified of data collected concerning him or her, the persons shall be granted access to the data concerning him or her and the persons have the right to demand the correction of inaccurate or misleading data.

1. Data We Collect

1.1. Users

1.1.1. We may collect, record and analyze information of Users of our website.

1.1.2. In order to provide services to our Users, we collect its personally identifiable information.

1.1.3. For creating an account at our site, the User provides us with information such as name, email address (Google or Apple authorization), telephone number, API keys and other relevant data. This information is used by us to identify the Users and provide them with Services, including mailings, notification, display of balances, making transactions, deposits replenishment, support and marketing actions, and to meet other contractual obligations.

1.2. When you access or use our Platform, we automatically collect information about you, including:

1.2.1. Log Information: We collect log information about your use of the Platform, including the type of browser you use, app version, access times, pages viewed, your IP address, any other network identifiers, and the page you visited before navigating to our Platform.

1.2.2. Device Information: We collect information about the computer or mobile device you use to access our Platform, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

1.2.3. Activities on the Site: We collect records of activities on the Site, including, any content you post, your account details, the time.

1.2.4.Location Information: In accordance with your device permissions, we may collect information about the precise location of your device.

1.2.5. Information Collected by Cookies and Other Tracking Technologies: We use different technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits. Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.

1.3. If you no longer wish to receive promotional emails, you may opt out of them by replying to one of such emails or send us an email with a request.

1.4. We are processing your Personal Data to provide our services in full (including support, communication, marketing etc.). When we share such information with our contractors (which may be located outside of the European Economic Area) in order to provide high quality support services in emergency cases, we rely on your consent and your request to do so. Processing of Personal Data for marketing purpose is also relies on consent obtained from you. We use such data in ways you would reasonably expect and which have a minimal privacy impact.

1.5. You can withdraw your consents at any time by sending the email with your withdrawal and your Personal Data will be deleted in 48 hours.

1.6. While processing the Personal Data of our Users, we rely on your consent to the processing of your Personal Data for the purpose to communicate with you. When we share such information with our contractors (which may be located outside of the European Economic Area) in order to provide a requested answer or solution promptly and correctly, we also rely on your consent. We use such data in ways you would reasonably expect and which have a minimal privacy impact. You can withdraw your consents at any time by sending us one more email with your withdrawal and your Personal Data will be deleted in 72 hours.

1.7. Please be aware while visiting our site. Users can follow links to other sites that are beyond our sphere of influence. We are not responsible for the content or privacy policies of these other sites.

1.8. Children's personal data. Please note that our services are exclusively offered to individuals at least 18 years old. We do not process any Personal Information of children under this age.

2. Compliance with General Data Protection Regulation (GDPR), US legislation and California Consumer Privacy Act (CCPA) and Brazil's General Data Protection Law (Lgpd (Lei Geral De Proteção De Dados))

2.1. For Users located in the European Economic Area (EEA) privacy rights are granted and all processing of Personal Data is performed in accordance with regulations and rules following the <u>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, known as the General Data Protection Regulation (GDPR), and the national legislation of USA.</u>

2.2. For Users located in California all processing of Personal Data is performed in accordance with regulations and rules following the <u>California Consumer Privacy Act</u>, Cal. Civ. Code § 1798.100 *et seq*. ("CCPA")

2.3. For Users located in Brazilia, all processing of Personal Data is performed in accordance with regulations and rules following the <u>Lei Geral de Proteção de Dados</u> ("LGPD").

3. Data access, data correction, data deletion, data portability and withdrawal of the consent

3.1. Users can review, correct, update, delete or transfer their personally identifiable information. For that, contact us directly at office@buycrypt.com. We will acknowledge your request within seventy-two (72) hours and handle it promptly and as required by law.

3.1.1.Right to access. Any Users may contact us to get confirmation as to whether or not we are processing User's personal data. When we process User's personal data, we will inform User of what categories of personal data we process regarding him/her, the processing purposes, the categories of recipients to whom personal data have been or will be disclosed and the envisaged storage period or criteria to determine that period.

3.1.2. Right to withdraw consent. In case our processing is based on a consent granted by the User, the User may withdraw the consent at any time by contacting us or by using the functionalities of our Services. Users can withdraw their consents at any time by replying to the email with its withdrawal and its Personal Data will be deleted in 48 hours. Withdrawing a consent may lead to fewer possibilities to use our Services.

3.1.3. Right to object. In case our processing is based on our legitimate interest to run, maintain and develop our business, any User has the right to object at any time to our processing. We shall then no longer process User's personal data unless for the provision of our Services or if we demonstrate other compelling legitimate grounds for our processing that override User's interests, rights and freedoms or for legal claims. Notwithstanding any consent granted beforehand for direct marketing purposes, any

User has the right to prohibit us from using his/her personal data for direct marketing purposes, by contacting us or by using the functionalities of the Services or unsubscribe possibilities in connection with our direct marketing messages.

3.1.4. Right to restriction of processing. Any User has the right to obtain from us restriction of processing of User's personal data, as foreseen by applicable data protection law, e.g. to allow our verification of accuracy of personal data after User's contesting of accuracy or to prevent us from erasing personal data when personal data are no longer necessary for the purposes but still required for User's legal claims or when our processing is unlawful. Restriction of processing may lead to fewer possibilities to use our Services.

3.1.5.Right to data portability. Any User has the right to receive User's personal data from us in a structured, commonly used and machine-readable format and to independently transmit those data to a third party, in case our processing is based on User's consent and carried out by automated means.

3.1.6. How to use these rights. To exercise any of the above mentioned rights, User should primarily use the functions offered by our Services. If such functions are however not sufficient for exercising such rights, User shall send us a letter or email to the address set out below under Contact, including the following information: name, address, phone number, email address and a copy of a valid proof of identity. We may request additional information necessary to confirm User's identity. We may reject requests that are unreasonably repetitive, excessive or manifestly unfounded.

3.2. If you are from California and dissatisfied with how we have used your personal information, you can complain to the <u>CalOPPA Complaint Form Privacy Notice</u>. Also You have the right to lodge a complaint with a supervisory authority if you think that we violate your rights. You could contact The California Department of Justice (Department) via their website (<u>https://www.oaq.ca.gov/privacy/caloppa/complaint-form/privacy-notice</u>).

3.3. If you are from Brazil, you can also file a complaint with Brazil's National Data Protection Authority (ANPD) through its official channels.

4. Data Retention

4.1. We will retain Personal Data for as long as you, as User, use our site, are continue to communicate with our support team. Your information will be deleted if you did not communicate with the support team for more than 12 months.

4.2. Unsolicited Information. If you provide us with personal information that we have not requested then we will endeavour to only retain the information that we are otherwise entitled to hold because of the products and services we provide. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information.

5. Information Security

5.1. We care to ensure the security of personal data. We follow generally accepted industry standards to protect the information submitted to us, both during transmission and once we receive it. We maintain technical, physical, and administrative security measures to provide reasonable protection for your Personal Data. When we or our contractors process Your information, we also make sure that your information is protected from unauthorized access, loss, manipulation, falsification, destruction or unauthorized disclosure. This is done through appropriate administrative, technical and physical measures.

5.2. There is no 100% secure method of transmission over the Internet or method of electronic storage. Therefore, we cannot guarantee its absolute security.

5.3. We never process any kind of sensitive data and criminal offence data not as a Controller nor as a Processor. Also we never undertake profiling of personal data.

6. Contractors

6.1. We work with third party service providers who provide website, application development, hosting, maintenance, and other services for us. They may be located outside of the EEA. These contractors may have access to, or process Personal Data on behalf of us as part of providing those services for us. We limit the information provided to these service providers to that which is reasonably necessary for them to perform their functions.

6.2. We hereby guarantee that we have data processing agreements in place with our service providers, ensuring compliance with the GDPR and our contracts with them, requiring us to maintain the confidentiality of such information. All data transfers inside and outside of the EEA are being done in accordance with these data processing agreements.

6.3. All data transfers are performed in accordance with the highest security regulations. Transfer of Personal Data to countries outside of the European Economic Area may be possible only in the case, when we have obtained your consent for it.

6.4. We use Google Analytics to monitor and analyze web traffic. <u>Google Analytics</u> is a web analysis service provided by Google LLC. (hereinafter — "Google"). Google utilizes the Data collected to track and examine the use of our website, to prepare reports on its activities and share them with other Google services. Google may use the Personal Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: USA – <u>Privacy Policy</u> – <u>Opt Out</u>. Privacy Shield participant.

6.5. We use <u>Facebook pixel</u> to monitor and analyze web traffic. Facebook pixel is a web analysis service provided by Facebook Ireland Ltd ("Facebook"). Facebook utilizes the Data collected to track and examine the use of our Website, to prepare reports on its activities and share them with other Facebook services. Facebook may use the Personal Data collected to contextualize and personalize the ads of its own advertising network. Personal Data collected: Cookies and Usage Data. Place of processing: the Republic of Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>. Privacy Shield participant.

6.6. We use <u>Firebase</u> to store and synchronize data between multiple clients. Firebase is a cloud-based database that allows to store and retrieve stored information. Personal Data collected: Usage Data. Place of processing: USA – <u>Privacy Policy</u>.

6.7. We use <u>Amplitude</u>. Amplitude, Inc. is a cloud-based product-analytics platform that helps to build better products. Place of processing: USA – <u>Privacy Policy</u> – <u>Opt Out</u>. Privacy Shield participant.

7. Cookies

7.1. 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 Sites, analyse trends, and administer the Platform.

7.2. The information collected from cookies allows us to determine such things as which parts of our Sites are most visited and difficulties our users may experience in accessing our Sites. With this knowledge, we can improve the quality of your experience on the Platform by recognising and delivering more of the most desired features and information, as well as by resolving access difficulties.

7.3. 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 personalised experience when using our Sites.

7.4. We use third party service provider(s), to assist us in better understanding the use of our Sites. 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 users navigate around our Sites, what products are browsed, and general Transaction information. Our service provider(s) analyses this information and provides us with aggregate reports.

7.5. The information and analysis provided by our service provider(s) will be used to assist us in better understanding our users' interests in our Sites 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 Sites other than to assist us.

7.6. You may control the cookies through the browser settings. Find out how to manage cookies on browsers:

- 7.6.1. Google Chrome
- 7.6.2. Mozilla Firefox
- 7.6.3. Microsoft Internet Explorer
- 7.6.4. Opera
- 7.6.5. Apple Safari
- 8. Application of this Privacy Policy

8.1. This Privacy Policy is applicable to our website. Our website contains links to other websites. Once redirected to another website, this Policy is no longer applicable.

9. Acceptance of these Conditions

9.1. We assume that all Users have carefully read this document and agree to its content. If one does not agree with this privacy policy, they should refrain from using our website.

10. Changes and Updates to Our Privacy Policy

10.1. From time to time, we may update this Privacy Policy. We will notify you about material changes by prominently posting a notice on our Service. We encourage you to periodically check back and review this Policy so that you always will know what information we collect, how we use it, and with whom we share it.

11. Fraud, Phishing and Email scams disclaimer

- **11.1.** Please be notified that BuyCrypt is not in any partnership with entities who represent themselves as users support agents, providing users support services via phone and/or social media and promise to help solve your issues for money. Remember user support is provided only via the BuyCrypt website and is always provided free of charge.
- **11.2.** If you discovered what you believe is a fraud, phishing, or scam which impersonates BuyCrypt, please email us at office@buycrypt.com.

12. Contact us!

12.1. If you have any questions, the practices of this Site, or your dealings with this website, please contact us at office@buycrypt.com.

BuyCrypt, BuyCrypt Inc.,

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