



Privacy policy

Of DCC Payments UAB

owner of cryptocurrency exchange platform cryptody.net

Version	Date	Updates made
1.1.	2023.04.11	-

General Provisions

As a crypto exchange platform, we prioritize the security of customer's personal data. We strictly adhere to the General Data Protection Regulation (GDPR) version 2.0 and Law of Republic of Lithuania on legal protection of personal data, which was amended on 16 July 2018 and which applies when you access or use our website www.cryptody.com, hereinafter – “Website”, or any related services provided by DCC Payments, Reg.No. 306028810, hereinafter – “Company” through the Website or mobile application. This also applies to any agreement you enter into with us, especially when you agree to our Terms and Conditions for using our services, hereinafter - “Services”, on Website or on mobile application.

Our privacy policy outlines how we use your personal data and the rights you have to control that use. We respect your fundamental rights and freedoms, including your right to the protection of your personal data. We will never use your personal data for purposes other than what we have outlined in our privacy policy, and we will always obtain your consent before collecting any sensitive personal data.

We believe that the free movement of personal data is important for the functioning of the Website and our mobile application, and we will not restrict or prohibit this movement without a valid reason. We will always comply with the GDPR when processing and moving personal data within the European Union.



The objective of this Privacy Policy is to provide a comprehensive explanation of, but not limited to:

- **'Personal data'** refers to any information that pertains to a recognized or recognizable individual ('data subject'). A recognizable individual is someone who can be recognized, either directly or indirectly, using an identifier such as a name, identification number, location data, online identifier, or specific physical, physiological, genetic, mental, economic, cultural, or social traits of that individual;
- **'Processing'** refers to any action or group of actions carried out on personal data or sets of personal data, whether automated or not. These actions may include gathering, recording, organizing, structuring, storing, modifying, retrieving, reviewing, utilizing, transmitting, distributing, combining, restricting, deleting or destroying personal data.
- **'Controller'** refers to a natural or legal person, public authority, agency, or any other body that determines the purposes and methods of processing personal data. If European Union or Member State law determines the purposes and means of processing personal data, the controller or the specific criteria for its appointment may be provided for by Union or Member State law. In this policy, the controllers are understood as the Company.
- **'Processor'** refers to a natural or legal person, public authority, agency, or any other body that processes personal data on behalf of the controller. The processor acts solely on the instructions of the controller and is required to ensure the security and confidentiality of the personal data it processes.
- **'Data subject'** refers to an individual whose personal data is collected, processed, or stored by the Company. Personal data includes information that can directly or indirectly identify an individual. In the terms of this privacy policy data subjects are considered as a customer of the Company and users of the Website.
- **'Consent'** the Company may share some of their personal information with third-party service providers that assist with the Company's business operations. However, the Company will not sell, trade, or share the users' information with any third parties without their explicit consent, except when required by law. **By using the Website or Services provided by the**



Company, users are giving their consent for their personal information to be shared as described in this privacy policy.

- **‘Third party’** in our privacy policy refers to any individual, company, public entity, organization, or group that is not the user, the Company that owns the data, or any person directly authorized by the company to handle personal data. These third parties may be involved in various aspects of our business operations, but we ensure that they are authorized to handle personal data and that any use of this data is in line with our privacy policy and provisions of applicable laws.

Furthermore, we are committed to processing personal data in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage. To achieve this, we have implemented appropriate technical and organizational measures to ensure the integrity and confidentiality of personal data, including such measures as password encryption of user’s accounts, SSL Certificate, "Two-Factor Authentication" (2FA), and designated compliance team who ensure that we do not collect more data from client’s that is requested by the applicable laws and regulations.

RIGHTS OF DATA SUBJECT (CUSTOMER)

- ◆ As a customer, you have the right to be informed about the processing of your personal data. When you use our Services through our Website, we collect personal data that you provide to us when you register your profile on our platform (Website). This data is collected to create your profile and wallet on our Website.
- ◆ You have the right to access your personal data and become familiar with the processing methods used. By logging in to your account on our Website, you can view the data collected for account creation and maintenance purposes.
- ◆ **KYC and AML Checks:** In order to comply with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations, we may request documentation from you if you intend to exceed a threshold of 700 EUR in a single transaction or in multiple transactions



in total, in accordance with our guidelines for onboarding individuals and legal persons .

- ◆ Source of Funds and High-Risk Clients: to maintain compliance with regulations and mitigate potential risks, we may request information and documentation regarding the source of funds for your transactions. Additionally, if we determine that you are considered a high-risk client, we may require additional information and documentation to fulfill our regulatory obligations.
- ◆ The customer possesses the right to refuse the use of their personal data for direct marketing purposes. If we receive written notification from the customer regarding this objection, we will cease processing their personal data for such purposes. Customer can always unsubscribe from newsletters.
- ◆ Customers have the right to submit written requests to the Company regarding the use and collection of their data. All requests must be sent in writing to our support team at support@cryptody.net. Additionally, Customers have the right to object to the processing of their Personal Information and to not be subject to automated decision-making or profiling unless it is necessary to perform our contractual obligations.
- ◆ Customers have the right to access, correct, update, and block any inaccurate or incorrect data related to their Personal data. They may also withdraw their consent for Personal data processing at any time. Finally, customers have the right to request the erasure of their Personal Information from our servers, which is known as the "right to be forgotten," provided that the request is justified.

COLLECTION OF PERSONAL DATA

Company (Cryptody) collect Personal Data through a variety of methods: either the customer provides the required information directly, or the information about the customer is collected by Company (Cryptody) from external open sources, or collected by using automated means.

Customers may give Company (Cryptody) personal details by filling in forms on Cryptody website or through the Cryptody app or by corresponding with Cryptody by phone, email or otherwise. This includes but is not limited to the following information:



- ◆ **Cryptody Account Administration.** Company (Cryptody) may collect personal information from customers in connection with the administration of customer account. This personal information may include but is not limited to, customer name, date of birth, age, nationality, country of residence, occupation, signature, utility bills, photographs, video footage, phone number, home address, email address, government-issued identification such as passport, national identification card with photograph, tax identification number, corporate documents and/or any other information deemed necessary to comply with Company (Cryptody) legal obligations.
- ◆ **Financial and Transactional Information.** Company (Cryptody) may collect financial information such as customer wallet address, bank account numbers, bank statements, transaction history, trading data, and credit/debit card numbers. Company (Cryptody) may collect personal information and details associated with customer transactions including, but not limited to, information about the transactions customer make using Company (Cryptody) services, the purpose of the transactions, information on sources of customer funds, sender and receiver of funds, and ultimate beneficiary information.
- ◆ **Customers Communications with Company (Cryptody).** Company (Cryptody) may collect personal information, such as email address, phone number, or mailing address when customers request information about (Cryptody) services, register for Company (Cryptody) newsletter, request customer or technical support, or otherwise communicate with Company (Cryptody).
- ◆ **Conferences, Trade Shows, and Other Events.** Company (Cryptody) may collect personal information from customers when customers attend or host conferences, trade shows, and other events.
- ◆ **Automatic Collection of Personal Information.** Company (Cryptody) may collect certain information automatically when the customer/user uses Company (Cryptody) services, such as customer Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising, and other unique identifiers, browser or device information, location information (including precise location information and/or approximate location derived from IP address), and Internet service provider. Company (Cryptody) may also automatically collect information regarding customer use of Company (Cryptody) Services, such as pages that customer visit before, during, and after using Company (Cryptody) Services,



information about the customer of the link click, the types of content customer interact with, the frequency and duration of customer activities, and other Information about how customer use Company (Cryptody) Services.

Information Company (Cryptody) Collect Required By Law, Rule, or Regulation: Depending on the Service, Company (Cryptody) may collect information from customer in order to meet regulatory obligations around know-your-customer (“KYC”) and anti-money laundering (“AML”) requirements.

Company (Cryptody) may analyze public blockchain data to ensure parties utilizing Company (Cryptody) Services are not engaged in illegal or prohibited activity under Company (Cryptody) User Agreement and to analyze transaction trends for research and development purposes.

Banks or payment processors that Company (Cryptody) use to transfer fiat currency may provide Company (Cryptody) with basic Personal Data, such as customer name and address, as well as, customer bank account information.

Advertising or analytics providers may provide Company (Cryptody) with anonymised information about customer, including but not limited to, how customer found Company (Cryptody) website.

ON WHAT BASIS THE DATA IS COLLECTED

Company (Cryptody) discloses customer information to trusted third parties and service providers, in order to offer and promote Company (Cryptody) Services, and to fulfill legal requirements, including responding to valid requests from regulators, law enforcement authorities, and government bodies. Company (Cryptody) only uses customer Personal Data where Company (Cryptody) has a legal basis to do so:

- ◆ **Consent.** For some processing activities, Company (Cryptody) requires customer prior consent. This applies for example to some of Company (Cryptody) direct marketing activities which fall under the scope of the GDPR. Customers will always be prompted to take clear, affirmative action so that Company (Cryptody) can ensure that customers agree with the processing of Customer Personal Data. This action may, for example, take the form of a checkbox or signature. If a customer has given consent for processing operations, the customer may always change their mind, and withdraw consent at any time and easily by sending an email to Company (Cryptody) support team.



- ◆ **Legal obligation.** In some cases, Company (Cryptody) has to process customer Personal Data to comply with legal obligations, including those applicable to financial services institutions, such as under the Republic of Lithuania Law on the Prevention of Money Laundering and Terrorist Financing and other anti-money laundering laws. Customer may not be eligible for certain Services if Company (Cryptody) cannot collect the Personal Data necessary to meet legal obligations.

USAGE OF PERSONAL DATA

All personal data is processed and stored securely, for no longer than is necessary considering the reason(s) for which it was first collected. Company (Cryptody) will always comply with its obligations and safeguard customer rights under the applicable legal requirements. Company (Cryptody) collects customer Personal Data to:

- ◆ Communicate with customers about Company (Cryptody) services and business and inform customers of matters that are important for their account and/or use of the website. Company (Cryptody) also use customer Personal Data to respond to any questions, comments, or requests customer filed with Company (Cryptody) and the handling of any complaints.
- ◆ Provide Company (Cryptody) Services (including customer support);
- ◆ Process transactions and send notices about customer transactions.
- ◆ Resolve disputes, collect fees, and troubleshoot problems, establish, exercise, and defend legal claims.
- ◆ Implementation of international sanctions
- ◆ Comply with Prevention of money laundering and terrorist financing (implementation of the principle "Know Your Customer") applicable laws, and regulations, monitor and report compliance issues.
- ◆ Perform risk management, including comparing information for accuracy and verifying it with third parties and protecting against, identifying, and preventing fraud and other prohibited or illegal activity, claims, and other liabilities.

DISCLOSURE OF PERSONAL INFORMATION

Company (Cryptody) do not sell, trade, or otherwise transfer to outside parties' customer Personally Identifiable Information. This does not include website hosting partners and



other parties who assist Company (Cryptody) in operating Company (Cryptody) website, conducting Company (Cryptody) business, or serving Company (Cryptody) customers, as long as those parties agree to keep this information confidential. Company (Cryptody) may share customer information with selected recipients to perform functions required to provide certain services to customers and/or in connection with Company (Cryptody) efforts to prevent and investigate fraudulent or other criminal activity. All such third parties will be contractually bound to protect data in compliance with Company (Cryptody) Privacy Policy.

Third party service providers who provide the following services:

- ◆ Cloud service providers providing cloud infrastructure.
- ◆ Providers of remote identity verification solutions.
- ◆ Providers of website analytics.
- ◆ Transaction monitoring IT solution providers.
- ◆ Financial institutions and banks.
- ◆ Law enforcement, government officials, regulatory institutions, or when Company (Cryptody) believe, in sole discretion, that the disclosure of data is necessary to report suspected illegal or fraudulent activity or to investigate violations of Company (Cryptody) User Agreement.

PROTECTION OF PERSONAL INFORMATION

Company (Cryptody) takes various security-ensuring technologies and procedures in order to protect customers' personal data against unauthorized or unlawful processing, accidental loss, misuse, unauthorized access, illegal usage, destruction, disclosure, damage and etc. This includes legal, organizational, technical, and physical security measures, such as the latest security systems, passwords, the ability to detect cyber security attacks and other threats to the integrity of the Platform, working only with trustworthy service providers, etc. However, no transmission of information via e-mail or other telecommunication channels or customer access to the Platform or the Services through the Internet could be fully secured. Therefore, customers should take due care when they are accessing the Platform or using the Services via the Internet or sharing confidential information via e-mail or other telecommunication channels.



DATA RETENTION

We will retain customers' personal information for the period of time not less than 8 years or as long as necessary to fulfill the purposes for which it was collected, or as required by Lithuanian law and/or regulations.

If the relations between customer and Company (Cryptody) was terminated by any of the sides of the agreement, the personal information will be retained until the end of 8 years period after the termination of the relations or when it is no longer needed, after which we will securely dispose of it; unless the retention of such information is required by laws and/or regulations.

Instances when data retention can exceed 8 years period:

If it is stated by Lithuanian law that information should be retained for more than 8 years.

CHANGES TO PRIVACY POLICY

We may update this privacy policy from time to time by posting a new version on our website. Customers should review the policy periodically to ensure that they are aware of any changes. Any personal information will be held and governed accordingly to our most recent Privacy Policy.

CONTACT INFORMATION

If customers have any questions or concerns about this privacy policy or our handling of their personal information, they may contact us at support@cryptody.net.