

Your privacy is important to us. We are committed to protecting the privacy, confidentiality and security of the personal data we hold by complying with the requirements under applicable laws and regulations. We are equally committed to ensuring that all our employees, service providers and agents uphold these obligations. This policy explains how we manage personal data within our company.

We collect personal data about you when you register for an account or receive emails from us. In some cases, we may be required by law to collect certain types of personal data about you.

Where we collect personal data from you, we will generally do so ourselves. However, in some cases, we may collect personal data from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

The kinds of personal data that we collect and hold about you may include:

- identifying information, such as your name and date of birth;
- contact information, such as your postal address or email address or telephone number;
- blockchain identifiers, such as blockchain addresses and public keys;
- emails and passwords that you create when registering for an account with us;
- details of any services that we provide to you;
- information about how you use the services we provide;
- records of our communications with you, including any messages you send us.

Without this information, we may not be able to provide you with our services (or with all of the features and functionality offered by our services) or to respond to queries or requests that you submit to us.

We use personal data that we collect about you for the following purposes:

- to verify your identity when you are dealing with us;
- to determine your eligibility for any of our services;
- to enable us to provide our services;
- to improve our website based on your information and feedback;
- to answer your queries and requests;
- to comply with our legal and regulatory obligations;
- to carry out market analysis and research;
- to monitor the use of our services;
- to assess, maintain, upgrade and improve our services;
- to manage and resolve any legal or commercial complaints or issues;
- to carry out planning and forecasting activities and other internal business processes;
- to keep you informed about our activities, including by sending our emails.

We may from time to time use your personal data in order to send you marketing materials about products or services that we think you may be interested in (including in some cases products and services that are provided by a third party). We may not use your personal data unless we have received your consent. You can opt-out of receiving marketing communications from us by contacting us at support@elgalcoin.com

We may use your following personal data for direct marketing:

- identifying information, such as your name and date of birth;
- contact information, such as your postal address, email address and telephone number;
- products and services portfolio information.

If we use your personal data in any direct marketing communications, you have the right to request that we provide you with the source of that personal data. There is no fee for requesting this information. We will provide you with the source of personal data unless it is impracticable or unreasonable to do so.

We may share personal data about you with:

- your representatives, advisers and others you have authorised to interact with us on your behalf;
- our staff who need the information to discharge their duties;
- our business partners, agents and service providers;
- payment system operators and financial institutions;
- prospective purchasers of all or part of our business or shares in our company;
- professional advisers whom we engage to provide advice on our business;
- government authorities who ask us to disclose that information, or to other people as required by law.

We will never sell your personal data to any third party.



• COOKIES

- We use cookies to monitor and observe your use of our websites, compile aggregate data about that use, and provide you with a more effective service (which may include customising parts of our websites based on your preferences and past activities on those websites). “Cookies” are small text files created and stored on your hard drive by your internet browser software, in order to hold relevant information about the web page you are currently viewing. Most internet browsers have a facility that will allow you to disable cookies altogether – please refer to your browser’s help menu to find out how to do this. While you will still be able to browse our websites with cookies disabled on your internet browser, some website functionality may not be available or may not function correctly.

• STORAGE AND SECURITY OF PERSONAL DATA

- We generally store the personal data that we collect in electronic databases. Sometimes we also keep hard copy records of this personal data in physical storage facilities. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, and we update these from time to time to address new and emerging security threats that you become aware of.

- We also take steps to monitor access to and modification of your information by our staff, and ensure that our staff are aware of and properly trained in their obligations for managing your privacy.

- Your personal data will not be kept longer than required. We may retain your personal data for a period of 5 years. At our discretion, we may retain personal data for longer (or shorter) than the said period if we consider it necessary or desirable to do so to meet our legal or regulatory obligations.

• ACCESS AND CORRECTION OF PERSONAL DATA

- If you want to access any of the personal data that we hold about you or to correct some aspect of it (e.g. because you think it is incomplete or incorrect), please contact our privacy compliance team at support@elgalcoin.com. To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

- Even if you do not request access to and/or correct your personal data held by us, if we are satisfied that, having regard to the reasons for which we hold your personal data, that personal data is inaccurate, incomplete, out-of-date, irrelevant or misleading, we may take reasonable steps to correct that information.

• YOUR CONSENT

- By using our site, providing personal data and/or using any of our services, you agree that you consent to this privacy policy, as updated from time to time and if you have provided personal data to us relating to any other person, you:

- have a right to provide that information;
- have provided a copy of this privacy policy, as updated from time to time, to that person; and each such person has agreed to those terms.

• COMPLAINTS

- We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal data and think we may have breached any applicable privacy laws or any other relevant obligation, please contact our privacy compliance team at support@elgalcoin.com. We will make a record of your complaint and refer it to our internal complaint resolution department for further investigation. We will deal with the matter as soon as we can, and keep you informed of the progress of our investigation.

• CHANGES TO THIS PRIVACY POLICY

- We may make changes to this policy from time to time, to take into account changes to our standard practices and procedures or where necessary to comply with new laws and regulations. The latest version of this policy will always be available on our website.

- Privacy Policy is drawn up in English and can be translated by you into any another language for examination. In case of discrepancies between the English and foreign language versions of the Privacy Policy, the English version will prevail. In case that one or more provisions hereof become invalid or unenforceable for any reason, this will not affect the validity or applicability of the remaining provisions.

