

This Appendix is an integral part of the current version of the User Agreement concluded between **Alcor Exchange** and the User and specifies the privacy policy used by **Alcor Exchange** in the process of rendering Services specified in User Agreement.

**Alcor Exchange** is committed to protecting and respecting User's privacy. This policy, together with any other documents referred to it, sets out the basis on which any personal data **Alcor Exchange** collect from User, or that User provide to **Alcor Exchange**, will be processed. Please read the following carefully to understand **Alcor Exchange's** practices regarding User's personal data. By visiting **Exchange.alcor.trade** website, the User is accepting and consenting to the practices described in this policy.

### Information Alcor Exchange May Collect from User

**Alcor Exchange** may collect and process the following data about User:

#### Information User provides to Alcor Exchange.

User can provide **Alcor Exchange** with information by filling in the relevant forms on **Exchange.alcor.trade** or by phone, email, during a video conference or in any other manner. This information includes personal data which was specified when registering on **Exchange.alcor.trade**, when subscribing to **Alcor Exchange** service, opening an account and verifying the identity of the account holder or persons authorized to use it, as well as the payment instruments used by a person, when searching for a product, using any of services provided by **Exchange.alcor.trade**, while placing orders on **Exchange.alcor.trade**, by participating in discussions or using any other communication functions on **Exchange.alcor.trade**, during participation in draws, promotions or surveys, and also when informing **Alcor Exchange** about problems or issues in the work of the website. The information User provides **Alcor Exchange** with may include Users:

- last name and first name,
- photos;
- videos,
- address;
- nationality,
- tax residency,
- phone number;
- e-mail address;
- logins and nicknames,
- bank details, including account numbers and payment details;
- date of birth;
- education;
- experience and occupation
- sources and amount of income;
- information on the status of User's accounts opened with banks or payment systems

#### Information Alcor Exchange collects about User.

About each of User's visits to **Exchange.alcor.trade** **Alcor Exchange** may automatically collect the following information:

- Technical information, including the internet protocol (IP) address used to connect User's computer to the internet, User's login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform
- Information about User's visit, including the full Uniform Resource Locators (URL) clickstream to, through and from **Exchange.alcor.trade** (including date and time); products User viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call **Alcor Exchange** customer service number;

- Information about geo-location. **Alcor Exchange** may collect information about real-time location based information from User's device at any time while User downloads or uses **Alcor Exchange's** services. **Alcor Exchange** may use this information for optimization purposes.
- financial data and information on the use of services and facilities provided by **Exchange.alcor.trade**, including information on implemented transactions and parties thereto, including on margin transactions, information on the status and (crypto) currency of accounts and cash flow on them, accrued commissions, information on crediting and withdrawal of funds from accounts

#### **Information *Alcor Exchange* receives from other sources.**

**Alcor Exchange** may receive information about User if User use any of the other websites **Alcor Exchange** operate or the other services **Alcor Exchange** provide. **Alcor Exchange** are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about User from them

### **Cookies**

Cookies are typically stored on User's computer's hard drive, which assigns a unique identification to User's computer. **Alcor Exchange** also may use cookies stored in emails to help **Alcor Exchange** confirm User's receipt of, and response to. **Alcor Exchange** also may use service provider(s) who will place cookies on the hard drive of User's computer and will receive information selected by **Alcor Exchange** that will provide **Alcor Exchange** with information about the way Users and visitors navigate on **Exchange.alcor.trade**, what products are browsed, and general transaction information.

Information collected from cookies is used by **Alcor Exchange** to evaluate the effectiveness of **Exchange.alcor.trade**, analyze trends, see what difficulties visitors may experience in regards to **Exchange.alcor.trade**, and administer the platform. This information in general is used to improve the quality of services.

By visiting **Exchange.alcor.trade** User agrees that **Alcor Exchange** may use browser feature known as a "cookie" for the purposes set above.

### **Uses made of the information**

**Alcor Exchange** may use information held about User in the following ways:

- to fulfill the obligations provided by any contracts concluded with User, as well as to provide User with the information, products and services that User requested;
- to verify and check the identity of Users who open and operate accounts in order to prevent fraud, deception and other illegal activities;
- to comply with legal requirements for the legalization (laundering) of proceeds from crime, financing of terrorism and financing the proliferation of weapons of mass destruction
- to notify User of other our products and services, similar to those products or services that User already purchased or information that User searched for;
- to provide User by **Alcor Exchange** or by third parties appointed by **Alcor Exchange** with information about products or services that User might be interested in. **Alcor Exchange** may contact User via electronic means of communication (via e-mail or SMS) to inform about products or services similar to those that were in a previous sale or negotiations. Upon User's consent **Alcor Exchange** may allow certain third parties to use User's data for marketing purposes;
- to notify User about changes related to **Alcor Exchange's** services;
- to improve **Exchange.alcor.trade** and to make sure that content is presented on User's computer's operating system the most effective way;
- for administration of **Alcor Exchange's** websites and for internal operations, including troubleshooting, data analysis, testing, statistical data collection and for conducting surveys;
- to ensure the security of **Exchange.alcor.trade**, **Alcor Exchange's** services, and User's accounts
- to evaluate and understand the effectiveness of promotional materials that **Alcor Exchange** provide to Users, as well as to provide User with the necessary advertising information

- to support, respond and resolve User's complaints and issues related to use of **Alcor Exchange's** services and the capabilities of **Exchange.alcor.trade**

### Disclosure of User's Information

- **Alcor Exchange** may share User's personal information with any of its subsidiaries and affiliates.
- **Alcor Exchange** may share User's information with selected third parties including:
  - Business partners, suppliers and sub-contractors for the performance of any contract **Alcor Exchange** enter into with them or User;
  - Alcor Exchange will not sell, purchase, provide, exchange or in any other manner disclose Account or Transaction data, or personal information of or about a Cardholder to anyone, except, it's Acquirer, Visa/Mastercard Corporations or in response to valid government demands.
  - Advertisers and advertising networks that require the data to select and serve relevant adverts to User and others. **Alcor Exchange** do not disclose information about identifiable individuals to advertisers, but may provide them with aggregate information about users. **Alcor Exchange** may also use such aggregate information to help advertisers reach the kind of audience they want to target. **Alcor Exchange** may make use of the personal data it have collected to comply with advertisers' demands by displaying their advertisement to that target audience;
  - Analytics and search engine providers that assist **Alcor Exchange** in the improvement and optimization of **Exchange.alcor.trade**.
- **Alcor Exchange** may also disclose User's personal data to third parties in the following cases:
  - If **Alcor Exchange** sell or buy any business or assets. Personal data of users may be disclosed to a potential buyer or seller;
  - If **Alcor Exchange** or all of its assets are purchased by a third party, personal data of users will be transferred as one of the assets;
  - If **Alcor Exchange** is required to disclose or transfer personal data of the User in accordance with any applicable laws or within the implementation of decisions of the relevant courts, or **Alcor Exchange** is compelled to force users to comply with the terms and conditions of the agreements concluded with **Alcor Exchange**; in case it is necessary to protect own rights, own property, to guarantee the safety of **Alcor Exchange**, its users or others. This includes the exchange of information with companies and organizations to prevent fraud and reduce the likelihood of default by borrowers in conducting margin transactions.

### Security and storage of personal data

**Alcor Exchange** have implemented security measures to ensure the confidentiality of Users personal data and to protect them from loss, misuse, alteration or destruction. Only authorized personnel of **Alcor Exchange** have access to User's personal data, and these personnel are required to treat the information as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

This site uses SSL or TLS encryption for security reasons and for the protection of the transmission of confidential content, such as the inquiries you send to us as the site operator. You can recognize an encrypted connection in your browser's address line when it changes from "http://" to "https://" and the lock icon is displayed in your browser's address bar.

If SSL or TLS encryption is activated, the data you transfer to us cannot be read by third parties.

The information **Alcor Exchange** receive from User can be transferred and stored outside the European Economic Area (EEA). The information about User can be processed by **Alcor Exchange** employees or employees of service providers outside the EEA. When storing or otherwise processing information by such third parties outside the EEA, **Alcor Exchange** guarantee that such third parties will be notified of **Alcor Exchange's** obligations under this Privacy Policy and will enter with them into relations that will impose obligations for them regarding User's personal data, which are at least have level of protection as specified in this Privacy Policy. Such employees, among other things, can process User's requests, payment details and provide technical support. By giving personal data to **Alcor Exchange**, User consent to the transfer, storage and processing of such personal data. In its turn, **Alcor Exchange** will take all necessary measures

to ensure that User's personal data is processed in compliance with the security rules and in accordance with the provisions of this Privacy Policy.

By using Services provided by **Alcor Exchange**, User expresses understanding that the transmission of information via the internet is not completely secure. Although **Alcor Exchange** undertakes all possible measures to protect User's personal data and uses strict procedures and security features to prevent unauthorized access, it cannot guarantee the security of User's data transmitted to **Exchange.alcor.trade**, therefore any such transmission committed at User's own risk.

### **Basis for personal data processing**

**Alcor Exchange** collect and process User's personal data only when it have a legitimate reason for such processing. Legal grounds include consent (in cases where User provides it), a contract (in cases where processing is necessary to fulfill the terms and conditions of contracts between User and **Alcor Exchange**), compliance with a legal obligations (in cases where **Alcor Exchange** is required to request / receive and process as well as to store User's personal data in order to comply with the requirements of applicable laws, for example the laws related to legalization (laundering) of proceeds of crime, financing of terrorism and financing the proliferation of weapons of mass destruction) and legitimate interest (for example, when processing is necessary to protect User or **Alcor Exchange** from certain threats (fraud, security, etc.), compliance with the provisions of applicable laws, the proper level of conduct of business (the quality of the services provided, identification of needs, preparation of reports), conclusion and implementation of corporate transactions (sale of participant interests / shares, mergers, acquisitions), etc.).

In cases where the basis for data processing is the consent, User have the right to withdraw it at any time.

### **User's rights**

By contacting **Alcor Exchange** you can realize the following rights:

- The right to delete User's data (all or part thereof);
- The right to change or correct User's data, in particular when it is incorrectly stated;
- The right to object or restrict processing of User's data;
- The right to access to User's data and to receive a copy of User's data, which User provided to **Alcor Exchange**, in a machine-readable format. Any access request may be subject to a fee to meet **Alcor Exchange's** costs in providing User with requested information.

User has the right to prohibit the use his/hers personal data for marketing purposes. Before requesting User's personal information, **Alcor Exchange** usually inform User that it is going to use User's data or disclose it to third parties for promotional purposes. User can use the right to prohibit such disclosure by contacting **Alcor Exchange** at any time.

The implementation of some of User's rights, depending on the situation, may limit, complicate or completely exclude the possibility of further cooperation between User and **Alcor Exchange**.

**Exchange.alcor.trade** may contain active links from / to the websites of partner organizations, advertisers and affiliated companies. If you are following an active link, please note that other websites have their own privacy policies, and we are not responsible for the provisions of these policies. Please review the privacy policies of these sites before sharing your personal information with them.

### **Information retention period**

**Alcor Exchange** will hold User's personal data only for as long as it is necessary for **Alcor Exchange** to do so, having regard to the purposes described in this privacy policy and **Alcor Exchange's** own legal and regulatory requirements but no less than five years after the relations between **Alcor Exchange** and User are cancelled.

**Alcor Exchange** may access User's personal data or retain it for a longer period if it will be subject to an official request or legal obligation, an investigation by the government or an investigation into possible violations of User Agreement, or in other cases to prevent possible harm based on reasonable considerations.

## Changes to Privacy policy

Any changes applied to this Privacy policy in the future will be posted on ***Exchange.alcor.trade*** and, where appropriate, notified to User by e-mail.