

## **PRIVACY AND PERSONAL DATA PROTECTION POLICY**

(version is valid from 27.05.2024)

Management of the website located at the address on the Internet: <https://scope360.io/> (hereinafter – the Platform / Website) and provision of services listed on the Website (hereinafter – Services) is exercised by the company Scope360 OÜ registered under the law of Estonia, (hereinafter – the Owner).

Privacy and Personal Data Protection Policy (hereinafter – Privacy Policy) is effective regarding all the information that the website Owner and/or website Administration receive about the User during using the website or receipt of Services, programs and products within the provision of these Services.

This Privacy Policy establishes the procedure of exercise processing of personal data by the Owner, types of collected personal data, the purpose of use of such personal data, cooperation of the Owner with third persons, security measures for personal data protection, conditions of access to the personal data, as well as contact details for the user regarding receipt of access, making changes, blocking or deletion of personal data and applying with any questions that the user might have regarding personal data protection practice.

### **• MAIN DEFINITIONS**

- Website / Platform – a website owned by the Owner and has an address on the Internet: <https://scope360.io/>, and is managed by the website Administration.

- Website Administration – persons authorized for the website management who organize and exercise personal data processing, as well as determine purposes of the processing of the personal data to be processed, actions or operations performed with personal data.

- User – any natural person who has access to the Website and uses it via the Internet.

- Personal Data – any information related directly or indirectly to a specific natural person (subject of the personal data).

- Services – systematization (organizing) of data, provided by the Customer via Application Programming Interface (API), regarding the purchase and sale (exchange) of virtual assets that have been performed by the Customer on the virtual assets exchange services (cryptocurrency exchange), as well as provision of the Customer with systematized data sets and display thereof in the Customer's Personal Account, or other services listed on the Website.

- Personal Data Processing – any action (operation) or set of actions (operations) exercised using means of automation or without using such means with personal data, including collection, recording, systematization, accumulation, storage, specification (update, change), recall, use, transfer (distribution, provision, access), blocking, deleting, destruction of personal data.

- Privacy of personal data – a mandatory requirement for the administration or other person who received access to the personal data to comply with to prevent its distribution without the consent of the subject of the personal data or the presence of another legal ground.

- Cookie – a fragment of data, sent by the web server and stored on the User's computer, which the web client or web browser sends to the web server in an HTTP request every time when trying to open the page of the corresponding site.

- IP-address – network address of the node in the computer network built via IP protocol.

- In this Privacy Policy other definitions not specified in this section might be used; in such a case definition of terminology used in the Privacy Policy is made according to the text thereof. If there is no unambiguous definition of the terminology in the text of the Privacy Policy, ones should follow the definitions of the terms: primarily – from materials placed on the Website, secondarily – definitions of the terms formulated on the Internet.

### **• GENERAL PROVISIONS**

- Use of the Website by the User means automatic and full consent of the User to this Privacy Policy and terms of processing of the User's personal data.
- If the User does not agree with the terms of the Privacy Policy, the latter has to stop using the Website and leave it immediately.
- This Privacy Policy is applied to the Website, Services or other closed website or application where materials, including but not limited to text materials, programs, and other video materials (training, seminars, conferences) are placed.
- The Website does not control and bear responsibility for the third persons' websites that the User can access following the links available on the Website.
- Website Administration does not check the personal data accuracy provided by the Website User.
- Website Administration is a controller of personal data of the authorized Services users/customers. The controller of personal data is a person who determines for what (with what purpose) and in what manner to collect personal data.

#### • **THE SCOPE OF THE PRIVACY POLICY**

- Privacy Policy establishes obligations of the website Administration regarding non-disclosure and ensuring the regime of protection of privacy of personal data that the User has to provide upon request to the website Administration when registering on the Website.
- Personal data allowed to process within this Privacy Policy are to be provided by the User via filling-in certain forms on the Website or in a free format and may contain the following information:
  - User's full name;
  - User's date of birth;
  - User's contact phone number;
  - User's email address;
  - other confidential data regarding the User's person or contacts.
- Except for the data provided in paragraph 3.2. of this Privacy Policy, website Administration reserves the right of automatic collection of the following data within the process of the User's viewing the Website or its separate pages:
  - IP-address of the User's electronic computing device (computer, phone, tablet etc.);
  - information regarding Cookies-data stored in the User's browser;
  - geolocational information (country, state or region, location by GPS);
  - information regarding the User's electronic computing devices (computers, phones, tablets, names, models of electronic computing devices, etc.);
  - information regarding the User's browser, including name, version of browser, etc.;
  - access time on the Website;
  - addresses of the Website's pages viewed by the User;
  - addresses of previous pages from which access to the Website was obtained.
- Disabling the function of Cookie collection by the User may cause an inability to access the parts of the Website.
- The Website collects confidential data provided in paragraphs 4.2. - 4.3. of this Privacy Policy with the purpose including detection and solving of the Website's technical issues, monitoring the load on the Website, as well as analytical and statistical purposes.
- Any other personal or confidential information not specified above is subject to reliable storage and not distribution, except for the cases provided for in paragraphs 7.2. and 7.3 of this Privacy Policy.
- The Website Administration collects information and Personal Data exclusively in cases when:
  - the user uses the website;

- the user purchases the Contractor's Services via Website or Mobile Application;
- the user creates a personal account / applies to create a personal account;
- the user uses their profile in social networks when registering on the Website or in Mobile Application.

- Website Administration does not collect any information to the processing of which the legislation has established specific requirements, including information about racial or ethnic origin, political, religious or philosophical beliefs, membership in political parties and trade unions, conviction to criminal punishment for committing a crime or conviction to criminal punishment, as well as information regarding health, sex life, biometric or genetic data.

- The User can transfer the information, Personal Data, via Internet by:
  - sending the letter to the email;
  - use of the Website / Platform;
  - filling-in application for receipt of the Services.

#### • **RESTRICTIONS**

- When registering or making order on the Website, the User acknowledges that has reached certain age allowing to enter contracts on their own.

- When the Website Administration asks User to provide consent to the personal data processing, the latter can do it on their own. When registering on the Platform, the User confirms that has reached certain age allowing to provide consent to the personal data processing on their own.

- If the User has doubts whether it can provide consent to the personal data processing on their own, it has to apply to the authorized body for the personal data protection.

- The website Administration can ask the User to provide additional documents or undergo additional procedures to make sure that the latter has the right to provide consent to the personal data processing on their own. If the website Administration has reasonable doubts regarding the User's age, it can apply to their parents or guardians to get the consent or approval to the User's Personal Data Processing, if the latter has not reached a certain age. For the period of clarification of the circumstances or getting consent or approval from the parents or guardians, the Website Administration may restrict the User's data processing via temporary blocking of the personal account.

#### • **PURPOSES OF THE USER'S DATA COLLECTION**

- The User's Personal Data may be used by the Website Administration for the following purposes:

- Identification of the User registered on the Website, placing an order and (or) accession to the public offer agreement.

- Provision of access to the User to the Website's personalized resources.

- Establishing feedback with the User, including destination of notifications, requests connected with the use of the Website, provision of services, the User's requests and applications processing.

- Determination of the User's location to ensure security and prevent fraud.

- Confirmation of accuracy and completeness of Personal Data provided by the User.

- Creation of personal account to exercise order if the User provides consent to creation of personal account.

- Notification of the Website User regarding the order status.

- Providing the User with effective client and technical support in case problems regarding the use of the Website occur.

- Providing the User by their consent with product updates, special offers, information regarding prices, news, and other information on behalf of the Owner.

- Performing advertising activity by the User's consent.

- Providing the User with access to the websites of the Owner's partners to receive products, updates and services.
- The User's Personal Data might be used for other purposes not provided by the Privacy Policy.

#### • **DATA STORAGE**

- The Website Administration stores the User's Personal Data within the period necessary for the Website Administration for the purpose provided for in this Privacy Policy, but this period cannot be less than 6 (six) months from the moment of receipt of such data.
- The Website Administration stores the User's Personal Data in its database located on the Website Administration's server.
- Data storage might be exercised by any other third person performing certain actions on behalf of the Administration. If the Website Administration does not need certain data regarding the User and they are not needed to be stored according to the legal requirements, the Administration will delete or store them in a way making it impossible to identify the User.

#### • **PROCEDURE AND WAYS OF DATA PROCESSING**

- The User's Personal Data Processing is carried out without any time limit in any legal way, including in personal data information systems with or without the use of automation tools.
- By staying on the Website, the User automatically agrees that the Website Administration has the right to transfer personal data to a third person exclusively to perform the User's order made on the Website.
- The User's Personal Data might be transferred to the authorized state and judicial bodies only if there are legal grounds.
- If personal data are lost or disclosed, the Website Administration informs the User regarding the loss or disclosure of personal data via any accessible means.
- The Website Administration takes necessary organizational and technical measures to protect personal information against unlawful or accidental access, destruction, alteration, blocking, copying, distribution, and other unlawful actions of third persons.
- The Website Administration together with the User take all necessary measures to prevent damages or other negative consequences caused by the loss or disclosure of the User's personal data.

#### • **COOKIE FILES**

- The Website can use 'cookie' which are small text files located on the computer or device of the User. When operating the Website uses pixel tags, web beacons and other similar technologies. These devices are used to analyze the page stream, customize the Services of the Website, optimize user interfaces, measure advertising effectiveness and strengthen trust and security. Via these devices, the Website collects the following data: identification of current internet providers, the User's IP address, type of browser and operating system, access to the Resource date and time, website address (if any) through which the User is connected to the Website, and other similar information related to traffic.
- Cookie files may be eternal and stored on the computer until the User deletes them, or temporary (session cookie) that are stored only until closing the browser. Moreover, cookie files are divided into primary and third-party, except for this, the User should pay attention to the following:
  - when a user visits the site again, the cookie data is updated;
  - in most cases, web-browser at default allows automatic storage of cookie on the user's device;
  - disabling the cookie may result in access restriction to the published materials and/or insufficient functioning of the Website services.

- The Website Administration cares about its users and tries to make their stay on the Website as comfortable as possible, therefore, the Website Administration must analyze the User's behavior, advantages and interests via cookie. Such analysis helps improve the experience of interaction with the Website and determine the most comfortable interface and Service navigation.

- According to the classification of the International Chamber of Commerce, the Website Administration can use the following cookie categories:

- Strictly Necessary cookie are needed for the user to navigate the webpage and use specific services, for instance, to access protected pages, register and authorize, and perform a search on the Website. They also memorize previous user actions when switching to the previous page within the same session.

- Exploitation cookie aggregate information regarding how the Website is used. These data are stored on the user's device between web-browser sessions. All information collected via exploitation cookie is aimed at statistic and analytic tasks. Some cookie data might be provided to third parties having permission from the web resource and exclusively for the purposes specified above.

- Functional cookie are used to store the settings or configurations saved on the user's device between web-browser sessions. These cookie also allow users to watch videos, participate in interactive (polls, voting) and interact with social networks. To make the impression after visiting resource more pleasant, mentioned cookie memorize information provided by the user increasing the effectiveness of interaction with the Website.

- Target cookie are used to provide content that might be interesting for the user. These data are stored on the user's device between web-browser sessions.

- The Website Administration may provide information regarding cookie to third persons, including but not limited to media clients, advertisers, agencies and partners.

- For prompt delivery, better display and detailed content analysis on the Website, the Website Administration uses services owned by third-party companies such as Facebook, Twitter, Instagram and others. These companies may use cookie on the user's device during work on the Website.

- Basic web browsers are set to automatic acceptance of cookie. Setting configuration of cookie for the mobile devices' web-browsers might differ;

- If the user does not enable the use of cookie or intentionally deletes all cookie from their web-browser, then when further visiting the Website, the user will be suggested again to enable and use cookie.

- Information regarding users received via cookie is not for sale or distribution in the public domain and also is a property of the company owning resource.

#### • **OBLIGATIONS**

- The Website Administration is obliged to:

- Use any received information exclusively for the purposes provided for in section 5 of this Privacy Policy.

- Ensure the preservation of secrets and storage of the User's Personal Information.

- Not to disclose personal data provided by the User without the prior written consent of the User, as well as not to sell, exchange, publish or disclose in other possible ways, except for subparagraphs 7.2., 7.3 of this Privacy Policy.

- To take precautionary measures to protect the privacy of the User's personal data under the procedure usually used for protection of this kind of information in the existing business practice.

- Effect blocking of personal data related to the relevant User upon application or request of the User, the User's legal representative or authorized body for protection of rights of the personal data subjects for the duration of inspection in the event of the discovery of inaccurate personal data or unlawful action.

- The User is obliged to:
- Provide precise and truthful information about personal data necessary to use the Website and receipt of Services.
- Update or supplement provided personal data information in case of change of such information.
- Take measures to protect access to the confidential data stored on the Website.

#### • **RESPONSIBILITY**

- If the Website Administration fails to fulfil its obligations, it bears responsibility for damages incurred by the User in connection with the unlawful use of personal data, under the current legislation, except for cases specified in subparagraphs 7.2., 7.3, and 10.2 of this Privacy Policy.
- In the event of loss or disclosure of Personal Data, the Website Administration shall not be liable if this personal data:
  - Became or was public at the time of loss or disclosure.
  - Was obtained from a third party before the moment of its receipt by the Website Administration.
  - Was disclosed with the User's consent.
  - The Website Administration is responsible under the current legislation of Ukraine in all relationships not provided for in this paragraph.

#### • **DISPUTE RESOLUTION**

- The User and the Website Administration solve all disputes and discrepancies that arise from the relationship under this Privacy Policy via negotiations.
- If the agreement is not reached, the dispute will be submitted for consideration to the judicial bodies at the location of the defendant according to the current procedural legislation of Ukraine.

#### • **FINAL PROVISIONS**

- The Website Administration is entitled to make changes to the current Privacy Policy without consent and notification of the User.
- New Privacy Policy becomes effective upon its placement on the Website if otherwise not provided in the new version of the Privacy Policy.
- This Privacy Policy is placed on the Website's webpage at the address on the Internet <https://scope360.io/>.
- All suggestions or questions regarding this Privacy Policy should be sent to the following email address [scope360.io@gmail.com](mailto:scope360.io@gmail.com).